

Summary of representations on the Schedule of Potential Main Modifications with Council responses

This document sets out the summary of representations received to the Schedule of Potential Main Modifications (30 September – 11 November 2021) to the Brentwood Local Plan 2016-2033 as submitted for Examination on 14 February 2020.

Summaries of representations are ordered by Main Modifications with a section covering supporting documents at the beginning. The table of contents below provides an overview of where the representation summaries can be found in this document.

Each of the summaries of representations includes:

- Representation summary ID number (4 digit number)
- Indication of whether the summary representation is in 'Support' or 'Object'
- Summary of representations
- Summary of representation changes to the plan
- Response (Council)
- Action (Council)
- All individual respondents attributed to the representation summary are then listed with representation ID (5 digit number) and bracketed respondent ID (3 or 4 digit number)

The Council's responses to the representation summaries have been provided as per the Inspectors' request. These are provided without prejudice to the Inspectors' final conclusions on the Local Plan.

This document has been prepared to facilitate and manage the consideration of representations and to assist in the process of reviewing all representations made only. The Inspectors' will consider all representations made on the Schedule of Potential Main Modifications in full alongside evidence presented throughout the duration of the Examination. In all cases, the original representations and attachments can be viewed online via the Council's [Consultation Portal](#).

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Schedule of Potential Main Modifications, In addition to the Schedule of Potential Main Modifications, representations can be made on a number of supporting documents.

9549

Support

Summary of representations:

Proposals Map Site R07: The amended site plan taking the Ongar Road out of the green belt as discussed at the Hearing Session is supported.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29806

Support

Respondent: Sow & Grow Nursery (Mr. Derek Armiger) [303]

Agent: MR ALAN WIPPERMAN [8060]

29809

Support

Respondent: Ms Heather Dunbar [8337]

Agent: MR ALAN WIPPERMAN [8060]

29813

Support

Respondent: Sow & Grow Nursery (Ms Kim Armiger) [4657]

Agent: MR ALAN WIPPERMAN [8060]

29818

Support

Respondent: Ms Maxine Armiger [4656]

Agent: MR ALAN WIPPERMAN [8060]

9832**Object****Summary of representations:**

The Tesco site at Sawyers Hall Farm is sustainably located within Central Brentwood Growth Corridor. The site can deliver 450 new homes within 5 years from the adoption of the Local Plan Review. Other benefits include:

- Securing the future of the Hopefield Animal Sanctuary and the construction of new stables and a new visitor centre on site. Tesco will also transfer the freehold of an 50-acre farm, not too far from Brentwood to the Sanctuary at nil cost.
- Parent/pupil drop-off/pick-up points within the site allocation.
- Improvements to Doddinghurst Road and Ongar Road.
- Internal pedestrian and cycle routes.

Summary of representation changes to plan:

None.

Response:

Noted. The Sustainability Appraisal concludes there is no easy choice when considering the potential inclusion of omission sites, hence there would be a need for detailed work, to include engagement with stakeholders, prior to consultation, and then likely further hearing sessions subsequent to consultation. The preferred approach from a perspective of seeking to maximise housing supply, is to conclude the Local Plan examination as soon as possible, and then commence preparation of a partial plan review, in line with the strict requirements set out by proposed new Policy MG06 (Local Plan Review).

Action:

No action required.

29891**Object**

Respondent: GL Hearn [252]

Agent: GL Hearn (Mr Selwyn Atkinson) [8822]

9841**Object****Summary of representations:**

BBC should reassess its Sustainability Appraisal with a view to looking at the present infrastructure, drainage, the destruction of Green Belt, our current public transport availability, over capacity of the school, impact of additional traffic from both the proposed sites and neighbouring developments. The Sustainability Appraisal (2.8.1) does not appear to consider the reality of the problem which has existed for many years. Only very major work on diverting the water would have to be undertaken at some considerable cost. Also the present concern of Climate Change damage must be taken into account and to cause environmental problems as are being experienced in other parts of the UK

Summary of representation changes to plan:

Reassess the Sustainability Appraisal with a view to looking at the present infrastructure, drainage, the destruction of Green Belt, our current public transport availability

Response:

Noted. It is not the purpose of the Sustainability Appraisal to assess infrastructure capacity. As part of the plan-making process, the Council has taken into account its evidence base to identify required infrastructure to support the level of planned growth. In addition, the Council has consulted neighbouring authorities and statutory bodies such as Environment Agency, Natural England and Essex County Council, Lead Local Flood Authority, Thames Water and Anglian Water, among others. It has not been identified any infrastructure issue that would prevent delivery of this number of homes. When developers submit relevant planning applications for development on site R25 and R26, detailed considerations including but not limited to flood risk and mitigation measures will be assessed and addressed at the planning application stage, informed by site specific detailed evidence. The Council will remain engaged with aforementioned organisations at the planning application process.

Action:

None required

30261**Object**

Respondent: Mrs Terri Reed [4303]

30402**Object**

Respondent: Mr Gerald Mountstevens [4911]

30407**Object**

Respondent: Mrs Patricia Mountstevens [9012]

30425**Object**

Respondent: Ms Patricia Taylor [6880]

9844**Object****Summary of representations:**

Policies Map: St Modwen proposed to remove additional land from the Green Belt to accommodate a new link road, access from the B186, and landscaping enhancements. BBC proposed to remove this additional land in Document F89. However, no modifications to the extent of alterations to the Green Belt are proposed in relation to E11 in the Policies Map. Unclear why the Council has changed its position with regards to the amendments to the site boundary and further Green Belt release. Concerned that future decision makers could consider the aforementioned areas not to meet NPPF paragraph 150 and constitute inappropriate development

Summary of representation changes to plan:

The best remedy to this is to remove the additional land from the Green Belt, as noted above and in previous submissions. However, in the event that the Council is not prepared to make such alterations to the Policies Map, we suggest an alternative approach would be to include additional supporting text within the BLP relating to this matter. Such text could explain that the A127 link road; B186 access; and landscaping to the south are all considered necessary to support the BEP (and in the case of the A127 link road, the wider objectives of the BLP), and to note that they are considered to be Green Belt compatible development as per paragraph 150 of the NPPF.

Response:

These proposed amendments to the site boundary and Green Belt release were discussed during the hearing discussion. In the event that the areas remain in the Green Belt, proposals will be considered against the criteria in the Framework.

Action:

No action required.

30237**Object**

Respondent: St Modwen Properties PLC and S&J Padfield and Partners [8835]

Agent: Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

9845

Object

Summary of representations:**Sustainability Appraisal:**

Note that the SA Addendum (Sep 2021) identifies 'strongly negative effects' associated with the Main Modifications that result in the Plan not meeting the full OAN, as well as the particularly low housing supply that will result in the early years of the plan, which will result in worsening affordability. The SA suggests however that there is no alternative to this situation aside from significant delays to the adoption of the current plan.

Summary of representation changes to plan:

We consider that the most appropriate action would be to include additional sites now such as land West of West Horndon;

Object to the assertion in Box 1.1 of the SA that West Horndon could not deliver early in the Plan period. EASL have undertaken significant preparatory work already and ready to submit an application. The only constraint is the progress of the Local Plan. Delivery analysis indicates that first completions could be achieved in approximately 3 years from adoption of the Plan.

Response:

Disagree, West Horndon would represent a large strategic site which would likely require substantial infrastructure and necessitate longer lead in times for delivery as per other similar sized sites identified for allocation in the plan.

Action:

No action required.

30272

Object

Respondent: EA Strategic Land LLP [279]

Agent: Icen Projects Limited (Mr Stuart Mills, Associate) [9165]

9848

Object

Summary of representations:**Sustainability Appraisal:**

In our view the SA Addendum is not correct to indicate that MM10 to some extent mitigates the harm generated by the failure to meet the OAN in full, as the key issue is one of early delivery, which the review will not address.

Summary of representation changes to plan:

Therefore we do not consider that this strategy addresses the fundamental issues with housing delivery that we have raised, and it would not be positively prepared or justified

Response:

Disagree, the SA concludes there is no easy choice when considering the potential inclusion of omission sites, hence there would be a need for detailed work, to include engagement with stakeholders, prior to consultation, and then likely further hearing sessions subsequent to consultation. The preferred approach from a perspective of seeking to maximise housing supply, is to conclude the Local Plan examination as soon as possible, and then commence preparation of a partial plan review, in line with the strict requirements set out by proposed new Policy MG06 (Local Plan Review).

Action:

No action required.

30273

Object

Respondent: EA Strategic Land LLP [279]

Agent: Icen Projects Limited (Mr Stuart Mills, Associate) [9165]

MM1

9542

Support

Summary of representations:

Support

Summary of representation changes to plan:

None required

Response:

Noted. Support welcomed

Action:

No action required.

30276

Support

Respondent: MR Graham Clegg [5485]

30288

Support

Respondent: Marine Management Organisation (Marine Consents, Marine Consents) [9168]

9543**Object****Summary of representations:**

Blackmore village does not fit the guidelines of either BBC or the Government; it is a distant village with poor road connections, distant from all local towns/railway stations, the bus service is unsuitable for commuting. Car travel is essential to get anywhere, so more houses more cars/pollution/congestion. Development in Blackmore will cause negative impacts on the village character, the detrimental impact on the health of the local community. Which is contrary to both the BBC and Government aims for reducing unnecessary journeys.

Summary of representation changes to plan:

The reason for selecting Blackmore for 70 new dwellings needs to be reviewed. How was this decision arrived at as Blackmore does not meet any of the strategic BBC tests or meet Government guidelines. Alternatively remove site R25 and R26 from the plan.

Response:

Noted. The Council has assessed all site submissions in terms of deliverability, availability and suitability to meet its objectively assessed local housing needs for the Borough. The proposed spatial strategy is considered to be sustainable. We recognise that not all development equally distributed across the Borough as there many other factors that need to be considered such as land availability and suitability. The Council has consulted its neighbours such as Epping Forest District Council on strategic cross boundary matters, as well as statutory bodies such as Environment Agency, Natural England and Essex County Council (Local Highways Authority, Lead Local Flood Authority, Lead Local Education Authority) on flood risk, highways safety and school capacity issues. With regards to windfall provision the Council has included a proportion within its overall housing provision. The Council has demonstrated during the Examination in Public hearing sessions that Blackmore is correctly identified within Category 3 in the settlement hierarchy due to the level of services currently available. The Council has assessed that it cannot meet its overall housing needs without releasing Green Belt land. It has demonstrated an exceptional circumstance for Green Belt release at site R25 and R26 at the hearing session. The Council considers that site allocations R25 and R26 align with its Strategic Objectives. Detailed considerations will be assessed and addressed at the planning application stage, informed by site specific detailed evidence.

Action:

No action required

29741**Object**

Respondent: Dr Murray Wood [7003]

29757**Object**

Respondent: Mrs Judith Bowland [8642]

29765**Object**

Respondent: Bernard Allen [8830]

29770**Object**

Respondent: Mr Callum Cartwright [8370]

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Respondent: Mrs Wendy Graham [9113]	
29774	Object
Respondent: Mr Scott Gosling [9112]	
29791	Object
Respondent: Blackmore Village Hall/Parish Council (Roger Keeble) [301]	
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29893	Object
Respondent: Mrs Karen Geary [8483]	
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Respondent: Mr Marcus Forstner [8160]	

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Respondent: Mrs Ceri Fisher [8459]	
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Respondent: Sally French [9031]	
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29987	Object
Respondent: Mrs Gillean Driver [9138]	
29961	Object
Respondent: Mrs Janet Daborn [9134]	
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Respondent: Mr Kenneth Herring [4841]	
29964	Object
Respondent: Samantha Dunk [8438]	
30076	Object
Respondent: Mrs Anne Adkins [8735]	

29974	Object
Respondent: Mr Daniel Dean [9137]	
30080	Object
Respondent: Mr John Adkins [8734]	
29979	Object
Respondent: Mrs Ruth Dimond [4851]	
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Respondent: Miss Tallulah Allen [8833]	
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Respondent: Mrs Patricia Dillon [8417]	
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Respondent: Mr Brian Bartlam [9155]	
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30177	Object
Respondent: Mr Stephen Murrell [8517]	
30021	Object
Respondent: Mr David Cartwright [7193]	

30194	Object
Respondent: Mrs Lorraine Murrell [8519]	
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Respondent: Mr Keith Creffield [8001]	
30206	Object
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30068	Object
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Respondent: Mrs Jane Lodge [8006]	
30074	Object
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Respondent: Mr Arthur Birch [4769]	
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Respondent: Mrs Iris Jones [8495]	

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Respondent: Mr Fraser House [9173]	
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Respondent: Mr Kenneth Bailey [5045]	
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Respondent: Mr Jeffrey Butler [9161]	

30365	Object
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Respondent: Mrs Jeanette Richardson [9179]	
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Respondent: Mr Richard Fisher [8480]	
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Respondent: Mr Ben Holmes [8654]	

30665	Object
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30351	Object
Respondent: Ms Cherie Hicks [9175]	
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Respondent: Mrs Rebecca Philpot [9197]	
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Respondent: Mrs Melanie Sanders [8511]	
30680	Object
Respondent: Mr Craig Philpot [9200]	
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Respondent: Mrs Kathryn Hurford [4275]	
30721	Object
Respondent: Mrs Debbie Spencer [6959]	
30380	Object
Respondent: Mr Michael Juniper [8129]	
30730	Object
Respondent: Mrs Faye Osborne [8458]	
30391	Object
Respondent: Mr Stephen Newton [8601]	
30754	Object
Respondent: Mr Ronald Sanders [9209]	

30399 **Object**

Respondent: Mr Gerald Mountstevens [4911]

30756 **Object**

Respondent: Ms Judith Phillips [8615]

30403 **Object**

Respondent: Mrs Patricia Mountstevens [9012]

30764 **Object**

Respondent: Mrs Sandra Price [9210]

30409 **Object**

Respondent: Miss Laura Harris [8685]

30769 **Object**

Respondent: Collin Sherwood [8908]

30426 **Object**

Respondent: Mrs Patricia Moulton [9176]

30772 **Object**

Respondent: Mr David Olley [8461]

30441 **Object**

Respondent: Mr Luke Holmes [8652]

30785 **Object**

Respondent: Mr Raymond Price [9211]

30468 **Object**

Respondent: Mrs Susan Hood [9181]

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Respondent: Mr Ken Holmes [8691]	
30800	Object
Respondent: Mrs Abbie Smith [9213]	
30486	Object
Respondent: Mr James Harris [8678]	
30807	Object
Respondent: Mr David Pegram [8622]	
30526	Object
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Respondent: Mr Terence Stenning [8544]	
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Respondent: Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]	
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Respondent: Mr John Richardson [4858]	

30562 **Object**

Respondent: Mrs Margaret Wiltshire [7141]

30583 **Object**

Respondent: Mrs Barbara Pratt [9185]

30585 **Object**

Respondent: Mr Raymond Thompson [4840]

30590 **Object**

Respondent: Mrs Sylvia Pascoe [7953]

30596 **Object**

Respondent: Mr Gary Durdant-Pead [8326]

30624 **Object**

Respondent: Mr Nicholas Wilkinson [8406]

30633 **Object**

Respondent: Mr Derek Tillet [8923]

30644 **Object**

Respondent: Mr Finn Thompson [9192]

30649 **Object**

Respondent: Miss Donna Taylor [8446]

30650 **Object**

Respondent: Mrs Christine Tabor [8427]

30655 **Object**

Respondent: Mr Frank Tabor [8424]

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30672	Object
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Respondent: Miss Caroline Smith [9199]	
30683	Object
Respondent: Mrs Julie Pounds [8608]	
30691	Object
Respondent: Mrs Jennifer Sirrell [8093]	
30693	Object
Respondent: Mrs Sophia Severn [9202]	
30698	Object
Respondent: Mr Ron Beazley [4831]	
30701	Object
Respondent: Mr Douglas Piper [603]	
30705	Object
Respondent: Mrs Eileen Piper [8381]	
30713	Object
Respondent: Mr Lloyd Piper [8616]	
30737	Object
Respondent: Mr Darryl Pounds [8609]	

30779

Object

Respondent: Mrs Jemma Olley [8462]

MM2

9544

Support

Summary of representations:

The insertion of Central Brentwood Growth Corridor section as part of the Local Plan's Strategic Objectives is supported, as is the increased emphasis on concentrating growth within the Central Brentwood Growth Corridor. Amendments to SO4 is supported.

Summary of representation changes to plan:

No action suggested.

Response:

Support is welcomed.

Action:

No action required.

29479

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

29830

Support

Respondent: Tesco Stores Limited [3856]

Agent: GL Hearn (Mr Selwyn Atkinson) [8822]

29890

Support

Respondent: GL Hearn [252]

Agent: GL Hearn (Mr Selwyn Atkinson) [8822]

9551**Object****Summary of representations:**

Blackmore is not a sustainable location for development. The plan (SO1) states the aim is to direct development to the most sustainable locations along identified growth corridors. The sites R25 and R26 are clearly not in the growth corridors. SO2 says enhance area of heritage value. By building 70 additional homes (an increase of 30%) in the village of Blackmore and increasing traffic in that location you will damage an area of special historic interest with the priory and the church. There is an existing high level of flood risk that will be exacerbated by the developments, which renders surrounding roads impassable with increasing frequency, restricting access for emergency services. The proposals are unsound and not positively prepared, and important representations have not been sufficiently considered.

Summary of representation changes to plan:

Remove R25 and R26

Response:

The Council has assessed all site submissions in terms of deliverability, availability and suitability to meet its objectively assessed local housing needs for the Borough. The proposed spatial strategy is considered to be sustainable. We recognise that not all development equally distributed across the Borough as there many other factors that need to be considered such as land availability and suitability. The Council remains engaged with its neighbours such as Epping Forest District Council on strategic cross boundary matters, as well as statutory bodies such as Environment Agency, Natural England and Essex County Council (Local Highways Authority, Lead Local Flood Authority, Lead Local Education Authority) on flood risk, highways safety and school capacity issues. With regards to windfall provision the Council has included a proportion within its overall housing provision. The Council has demonstrated during the Examination in Public hearing sessions that Blackmore is correctly identified within Category 3 in the settlement hierarchy due to the level of services currently available. The Council has assessed that it cannot meet its overall housing needs without releasing Green Belt land. It has demonstrated an exceptional circumstance for Green Belt release at site R25 and R26 at the hearing session. The Council considers that site allocations R25 and R26 align with its Strategic Objectives. Detailed considerations will be assessed and addressed at the planning application stage, informed by site specific detailed evidence.

Action:

No action required regarding MM2. The objections are raised as to how site allocations R25 and R26 align with the Council's Strategic Objectives, rather than against the proposed modifications to the Strategic Objectives.

29749**Object**

Respondent: Mr Craig Stevens [4958]

29792**Object**

Respondent: Blackmore Village Hall/Parish Council (Roger Keeble) [301]

30207**Object**

Respondent: Mr Keith Lodge [8969]

30214**Object**

Respondent: Mrs Jane Lodge [8006]

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Respondent: Mrs Jane House [8681]	
30506	Object
Respondent: Blackmore Village Heritage Association [8568] Agent: Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]	
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Respondent: Mr Richard Thwaite [6964]	
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Respondent: Mr Conrad Dixon [8688]	
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Respondent: Dr Murray Wood [7003]	
29758	Object
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29766	Object
Respondent: Bernard Allen [8830]	

29771	Object
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Respondent: Mr John Eaton [8124]	
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Respondent: Ann Eustace [9020]	
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Respondent: Mrs Janet Daborn [9134]	
29965	Object
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29975	Object
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30313 **Object**

Respondent: Ms Annie Jackson [8921]

30320 **Object**

Respondent: Mrs Iris Jones [8495]

30325 **Object**

Respondent: Mrs Charlotte Howse [8915]

30330 **Object**

Respondent: Mr Ben Holmes [8654]

30339 **Object**

Respondent: Mrs Jane House [8681]

30343 **Object**

Respondent: Mr Fraser House [9173]

30349 **Object**

Respondent: Mr Raymond Hatfield [8869]

30352 **Object**

Respondent: Ms Cherie Hicks [9175]

30357 **Object**

Respondent: Mr Adam Harris [8679]

30361 **Object**

Respondent: Mrs Melanie Sanders [8511]

30366 **Object**

Respondent: Susan Harris [8686]

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Respondent: Mr Michael Juniper [8129]	
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30469	Object
Respondent: Mrs Susan Hood [9181]	
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Respondent: Mr Ken Holmes [8691]	
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Respondent: Mr Peter Ryan [4937]	
30523	Object
Respondent: Ms Jane Rogers [9183]	
30527	Object
Respondent: Mrs Margaret Roast [9184]	
30535	Object
Respondent: Mrs Joanne Ryan [8889]	
30543	Object
Respondent: Mrs Joan Westover [4635]	
30553	Object
Respondent: Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]	
30556	Object
Respondent: Mr John Richardson [4858]	

30564	Object
Respondent: Mrs Margaret Wiltshire [7141]	
30574	Object
Respondent: Mrs Judith Wood [4852]	
30584	Object
Respondent: Mrs Barbara Pratt [9185]	
30587	Object
Respondent: Mr Raymond Thompson [4840]	
30591	Object
Respondent: Mrs Sylvia Pascoe [7953]	
30597	Object
Respondent: Mr Gary Durdant-Pead [8326]	
30605	Object
Respondent: Mrs Rita Tuffey [4620]	
30610	Object
Respondent: Mrs Louise Roast [9188]	
30620	Object
Respondent: Mrs Natalie Walters [8959]	
30625	Object
Respondent: Mr Nicholas Wilkinson [8406]	
30634	Object
Respondent: Mr Derek Tillet [8923]	

30637	Object
Respondent: Mr & Mrs Ian and Janet Tennet [9191]	
30645	Object
Respondent: Mr Finn Thompson [9192]	
30651	Object
Respondent: Mrs Christine Tabor [8427]	
30656	Object
Respondent: Mr Frank Tabor [8424]	
30666	Object
Respondent: Mr Stephen Poulton [8149]	
30670	Object
Respondent: Mrs Rebecca Philpot [9197]	
30673	Object
Respondent: Mr Kyle Pounds [9198]	
30681	Object
Respondent: Mr Craig Philpot [9200]	
30684	Object
Respondent: Mrs Julie Pounds [8608]	
30692	Object
Respondent: Mrs Jennifer Sirrell [8093]	
30694	Object
Respondent: Mrs Sophia Severn [9202]	

30699	Object
Respondent: Mr Ron Beazley [4831]	
30702	Object
Respondent: Mr Douglas Piper [603]	
30706	Object
Respondent: Mrs Eileen Piper [8381]	
30714	Object
Respondent: Mr Lloyd Piper [8616]	
30722	Object
Respondent: Mrs Debbie Spencer [6959]	
30731	Object
Respondent: Mrs Faye Osborne [8458]	
30738	Object
Respondent: Mr Darryl Pounds [8609]	
30751	Object
Respondent: Mr John Randall [8852]	
30755	Object
Respondent: Mr Ronald Sanders [9209]	
30765	Object
Respondent: Mrs Sandra Price [9210]	
30770	Object
Respondent: Collin Sherwood [8908]	

30773

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Respondent: Mr David Olley [8461]

30781

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Respondent: Mrs Jemma Olley [8462]

30786

Object

Respondent: Mr Raymond Price [9211]

30793

Object

Respondent: Mr David Smith [4872]

30802

Object

Respondent: Mrs Abbie Smith [9213]

30808

Object

Respondent: Mr David Pegram [8622]

30813

Object

Respondent: Mr Richard Smith [9214]

30818

Object

Respondent: Mr Terence Stenning [8544]

9756

Object

Summary of representations:

The "landscape-led design approach" in MM2 needs to be integrated with the Essex Design Guide Version 3 (2018) with a revised definition of Garden Land. The revised wording proposed (page 72) for paragraph 5.175 refers too loosely to relevant guidance in the Essex

Design Guide. The proposed definition of Garden Land in the Main Modification by implication always includes and allows communal garden space, which the Design Guide provide is a matter for each local authority. The MM definition should be revisited to avoid uncertainty as to the curtilage of each dwelling, and shared access to and maintenance of communal amenity garden spaces. The incorporation of a Health Impact Assessment into the design of communal gardens should also be considered.

Summary of representation changes to plan:

Para 217 SO2 , after the words "human health" add: " The Use of Landscape in Urban Spaces contained in the Essex Design Guide shall apply, and where new flats and 1-and 2- bedroomed dwellings are created, Communal Gardens should provide visual amenity and outdoor space for residents. Also, soft landscaping should be prioritised over areas of hard standing and areas should not be dominated by vehicle parking; , appropriate planning conditions shall secure maintenance. Consideration should be given to including outdoor seating, playing areas and health impact assessments. The definition of Garden Land in Policy NE02 shall apply."

Response:

Disagree, the suggested changes are not considered necessary for soundness. The Essex Design Guide is endorsed by the Council but is not an adopted supplementary planning document.

Action:

None required

29883

Object

Respondent: Philip Cunliffe-Jones [1406]

9762

Object

Summary of representations:

"Brownfield opportunities to be encouraged" has been deleted. This goes against recent government policy to promote brownfield development.

Summary of representation changes to plan:

Encourage brownfield development rather than Green Belt.

Response:

Observation noted and disagreed. The deletion of "Brownfield opportunities to be encouraged" in MM2 is only a part of a set of modifications, it should be read with other modifications (MM) and the Plan as a whole. The Council has undertaken a comprehensive sequential analysis and review of sites to select suitable site allocations. It prioritises growth based on brownfield land and land in urban areas first; and only then brownfield land in Green Belt areas where deemed appropriate according to policies in the Plan. However, it has been demonstrated that the Council cannot meet its overall housing needs relying on brownfield sites alone and that the proposed spatial strategy is considered to be sustainable. Chapter 3 and Chapter 4 provide detailed explanation of the spatial strategy and the sequential land use approach.

Action:

None required

29856

Object

Respondent: Mrs Edna Williams [4728]

9766

Object

Summary of representations:

There is a concern that whilst bolstering transport corridors and development the village feel is lost. Concern around infrastructure of transport links as well. Increasing flow of traffic and dwelling will lead to grid lock.

Summary of representation changes to plan:

Forecasts needs to be provided with the plans to fully understand impact before sign off of plans.

Response:

Noted. - Regarding the village feel: When developers submit relevant planning applications for development on site, detailed considerations including but not limited to design, responding to the local characters, flood mitigations, highways access and safety, sustainable transport measures, infrastructure contributions, will be assessed and addressed at the planning application stage, informed by site specific detailed evidence. The Council will remain engaged with neighbouring authorities on strategic matters and statutory bodies such as Environment Agency, Natural England and Essex County Council (Local Highways Authority, Lead Local Flood Authority, Lead Local Education Authority) on the aforementioned matters. - Regarding infrastructure, as part of the plan-making process, the Council has prepared an Infrastructure Delivery Plan identifying required infrastructure to support the level of planned growth. This document is live and will be updated periodically based on the most up to date evidence and in liaison with service providers, statutory bodies and stakeholders to ensure a timely identification and delivery of required infrastructure.

Action:

No change required

29711

Object

Respondent: Gita Mackintosh [7214]

9776**Object****Summary of representations:**

Corridor development around A12 will lead to loss of identity of individual communities/villages which will become joined up by housing. A12 corridor is a red herring - unless access roads are created it will not help transit within the Borough in any meaningful way. Furthermore it will exacerbate already harmful levels of pollution in those areas. Finally, the specific proposed development off Doddinghurst Road alongside the A12 will introduce even more traffic to an already overloaded junction with Ongar Road and thence on into the Town Centre - I can find no reference to any traffic planning; it will also have an adverse impact on wildlife.

Summary of representation changes to plan:

Remove large developments from minor roads and put the burden where the roads can better cope with it. A12 and Great Eastern main line are already at capacity at rush hour. Additional transport routes are needed.

Response:

Regarding evidence base: As part of the plan-making process, the Council has prepared a Transport Assessment modelling traffic impacts from proposed growth as well as an Infrastructure Delivery Plan identifying required infrastructure to support the level of planned growth. This document is live and will be updated periodically based on the most up to date evidence and in liaison with service providers, statutory bodies such as the Environment Agency, Natural England and Essex County Council (Local Highways Authority, Lead Local Flood Authority, Lead Local Education Authority) and stakeholders to ensure a timely identification and delivery of required infrastructure. Regarding cumulative impacts and loss of identity: When developers submit relevant planning applications for development on site, detailed considerations including but not limited to design, responding to the local characters, flood mitigations, highways access and safety, sustainable transport measures, infrastructure contributions, air quality, and biodiversity will be assessed and addressed at the planning application stage, informed by site specific detailed evidence.

Action:

No change required

29678**Object**

Respondent: Mr John Darragh [4862]

29681**Object**

Respondent: Mr Dave Kingaby [9096]

9779**Object****Summary of representations:**

Further development of green belt should be minimal to preserve them for future generations.

Summary of representation changes to plan:

No action identified

Response:

Noted. The Council has undertaken a comprehensive sequential analysis and review of sites to select suitable site allocations. It prioritises growth based on brownfield land and land in urban areas first; and only then brownfield land in Green Belt areas where deemed appropriate according to policies in the Plan. However, it has been demonstrated that the Council cannot meet its overall housing needs relying on brownfield sites alone and that the proposed spatial strategy is considered to be sustainable. Chapter 3 and Chapter 4 provide detailed explanation of the spatial strategy and the sequential land use approach.

Action:

None required

29679**Object**

Respondent: Mr John Darragh [4862]

MM4**9804****Object****Summary of representations:**

Council should adopt the Sedgfield method when calculating 5 year housing land supply. Using this shows only 4.5 year housing land supply.

If the Inspectors find the plan sound request that it is put on public record that the Council is unable to demonstrate a 5 year housing land supply when using the appropriate Sedgfield method.

Summary of representation changes to plan:

The Liverpool method should not be used to calculate the 5-year housing land supply. The Inspectors should acknowledge that Brentwood Borough Council are unable to demonstrate a 5-year housing land supply when using the appropriate Sedgfield method.

Response:

Disagree, the Liverpool method has been applied and is justified in recognising the longer lead in time for delivery of large strategic sites identified in the Local Plan

Action:

None required

29826**Object**

Respondent: Tesco Stores Limited [3856]

Agent: GL Hearn (Mr Selwyn Atkinson) [8822]

9805**Object****Summary of representations:**

Object to the new employment land requirement figure as it is significantly below the employment land required to meet the borough's needs over the plan period. Recommend that an additional 11.6 ha of new employment land is needed to address the Council's unrealistic approach to replacing lost office floorspace and is required to support the Council's proposal to create at least 5,000 additional jobs over the plan period.

Summary of representation changes to plan:

Requests that in order for the Plan to be found sound, Policy MG01 is amended to require that at least 58.24 ha of new employment land is proposed to be allocated.

Response:

Disagree, there was no identified shortfall in employment need identified through the hearing sessions and set out in relevant hearing statements. The amount of employment land required to meet identified needs is considered appropriate.

Action:

None required

29831**Object**

Respondent: MM Properties Ltd [6076]

Agent: Savills UK (Mr Gregory Evans, Associate) [9117]

9811**Object****Summary of representations:**

CEG generally supports the proposed amendments to Policy SP02. However, an amendment is required to make the policy effective and to aid clarity. The quantum of housing development required to be built within the Borough across the plan-period is a minimum; at present it could be read that the figure is a cap. The change below would ensure consistency with the NPPF (2021); specifically paragraphs 60 and 61. It would also ensure the policy is positively prepared

Summary of representation changes to plan:

Amend A.a to read: "A minimum of 7,752 new residential dwellings" [...] (insert a minimum of) Amendment will make it clear the quantum of development is a minimum figure; consistent with paragraph 61 of the NPPF (2021) in the context of the Government's objective to significantly boost the supply of homes (Paragraph 60). This would also ensure the policy is positively prepared.

Response:

Disagree, not considered necessary to make policy sound

Action:

None required

30063**Object**

Respondent: CEG Land Promotions Limited [5050]

Agent: Lichfields (Ms Rachel Clements, Associate Director) [9145]

9812**Object****Summary of representations:**

Part Aa of Policy MG01 as amended proposes a stepped housing requirement. This significant back-loading reverses the position the Council adopted during Stage 1 of the Hearings that it would no longer require a stepped requirement, and that it could achieve a 456 dpa average throughout the Plan period. We object to the introduction of a stepped requirement, which will fail to meet the housing needs of the Borough for the initial years of the Plan, and thus perpetuate the significant affordability issues arising from a lack of supply.

There are suitable sites that are capable of significantly boosting the supply of housing, which have been assessed by the Council as reasonable alternatives and should thus be included as additional allocations at this stage.

Summary of representation changes to plan:

Increase the housing requirement and housing supply, and remove the stepped trajectory from Policy MG01. There are suitable sites (such as land west of Thorndon Avenue) that are capable of significantly boosting the supply of housing, which have been assessed by the Council as reasonable alternatives and should thus be included as additional allocations at this stage.

Response:

Disagree, the Council considers the utilisation of a stepped trajectory a pragmatic approach in response to significant increase in housing delivery. From a perspective of seeking to maximise housing supply, it is considered necessary to conclude the Local Plan examination as soon as possible, and then commence preparation of a partial plan review, in line with the strict requirements set out by proposed new Policy MG06 (Local Plan Review).

Action:

None required

30271**Object**

Respondent: EA Strategic Land LLP [279]

Agent: Icen Projects Limited (Mr Stuart Mills, Associate) [9165]

9814**Object**

Summary of representations:

The housing requirement figure is not positively prepared as it fails to provide a strategy which as a minimum seeks to meet the area's objectively assessed needs. Further, it is not consistent with national policy and paragraph 61 of the Framework. Local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted to PINS for examination. As the plan is unlikely to be adopted prior to 14 Feb 2022 the plan cannot rely upon the previous Standard Method figure from Feb 2020.

As at Nov 2021 LHN based on standard method is 459 dwellings per annum. Although the difference is modest, the proposed housing requirement in MM4 now no longer reflects the LHN as informed by the Standard Method.

Further, it is not an appropriate strategy taking into account reasonable alternatives (i.e. including a housing requirement figure that meets the area's objectively assessed need). The Council has not justified with evidence why it is unable to meet its objectively assessed needs.

The trajectory within Main Modification 4 and Annexe 1 illustrate that the Plan is not effective and that the housing requirement is not deliverable over the Plan period. Further, it is not consistent with national policy as it does not make sufficient provision for new housing.

The updated trajectory shows there is now a shortfall of 606 dwellings against the proposed housing requirement set out in MM4. Hallam have made previous representations explaining that the plan could be modified to include additional site allocations to address the shortfall.

Summary of representation changes to plan:

MM4 should be amended to include a housing requirement that reflects Local Housing Need based on up-to-date Standard Method, with an allowance for flexibility, and a trajectory and supply of sites that demonstrates sufficient provision to meet the OAN.

Response:

Disagree, on submission of the plan in Feb 2020, the housing requirement, as set in early 2019, was based on the standard-method LHN of On submission of the plan in Feb 2020, the housing requirement, 350 dpa, plus a margin to cover the possibility that a new standard method would increase the LHN, including future changes in the standard method, as transpired. Since submission the Council has taken into consideration changes in the standard method, hence the publication of a 452 dpa LHN narrative in the November 2020 Matter 4 Hearing Statement. The Council has not relied upon its position at submission, in relation to housing requirement on account of MM10 which proposes new Policy MG06: Local Plan Review. This commits the Council to an immediate partial review of the Local Plan, incorporating an update of Objectively Assessed Housing Needs in accordance with the NPPF 2021 and related guidance.

Action:

None required

30026**Object**

Respondent: Hallam Land Management Ltd [2353]

Agent: Marrons Planning (Mr Gary Stephens, Planning Director) [8825]

9816**Object****Summary of representations:**

Object to the inclusion of the proposed stepped housing delivery trajectory in policy MG01 as set out at A(a). The South Essex Strategic Growth Locations Study (May 2020) (F34A) shows a more sustainable and appropriate direction for the Local Plan's spatial development strategy that could be brought forward to secure a meaningful five year housing land supply instead of relying upon an unrealistic stepped housing delivery trajectory as MM4 proposes.

Summary of representation changes to plan:

- flatten the delivery rate curve of the stepped housing trajectory - take a more positive and proactive approach to meeting housing in full with headroom - allocate more housing land and sites at sustainable, suitable and available locations, such as site 022 Honeypot Land

Response:

Noted, and disagree. The Council considers the utilisation of a stepped trajectory a pragmatic approach in response to significant increase in housing delivery. As stated in the SA Addendum (2021), there is no easy choice when considering the potential inclusion of omission sites, hence there would be a need for detailed work, to include engagement with stakeholders, prior to consultation, and then likely further hearing sessions subsequent to consultation. The preferred approach from a perspective of seeking to maximise housing supply, is to conclude the Local Plan examination as soon as possible, and then commence preparation of a partial plan review, in line with the strict requirements set out by proposed new Policy MG06 (Local Plan Review).

Action:

None required

29902**Object****Respondent:** U+I Group [9127]**Agent:** Chilmark Consulting Limited (Mr. Mike Taylor) [2703]

9818**Object****Summary of representations:**

Object specifically to part Aa inserted by the modification.

The housing requirement should be higher than the 7,752 dwellings identified to boost housing supply and provide sufficient headroom. The trajectory indicates that just 7,146 dwellings will be delivered over the plan period to 2033, a shortfall of 606 dwellings. Consider that Part A. a. of the policy as amended is incorrect and misleading in terms of the number of homes the Plan actually makes provision for.

We consider the policy (as amended) to be unsound, as it is not positively prepared or consistent with national policy.

Summary of representation changes to plan:

In order to make the policy sound, in our view it is necessary to increase the housing requirement and housing supply, and remove the stepped trajectory from Policy MG01. Whilst the Council considers that it would be most appropriate to deal with these deficiencies through an immediate review of the Local Plan following adoption, we consider that the soundness issues identified can and should be addressed at this stage, with sites such as land west of Thorndon Avenue providing suitable, deliverable options to significantly boost the supply without undue delay.

Response:

Disagree, proposed wording of Policy MG01 Part A. a. is considered positively prepared and effective in setting out the Councils commitment to provide for an identified housing requirement of 7,752. Proposed modification MM10, which proposes new Policy MG06: Local Plan Review, commits the Council to an immediate partial review of the Local Plan in order to identify the required additional supply and close the gap between housing supply and housing need.

Action:

None required.

30270**Object**

Respondent: EA Strategic Land LLP [279]

Agent: Icen Projects Limited (Mr Stuart Mills, Associate) [9165]

MM5**9563****Object****Summary of representations:**

Blackmore should be category 4 not 3.

Summary of representation changes to plan:

Blackmore cannot be compared to the other villages in category 3 (MG03 Settlement Hierarchy). This categorization must be reviewed. The village is incomparable to others listed in category 3, in terms of size, facilities, shops / resources, or connectivity (roads / public transport). This mis categorization is a flagrant attempt to justify the inclusion of R25 and R26, rendering MM5 unsound due to it not positively prepared, or justified. Having a primary school should not constitute category 4 status - it is necessary due to the remoteness of our village - unrelated to size!

Response:

The Council has demonstrated during the Examination in Public hearing sessions that Blackmore is correctly identified within Category 3 in the settlement hierarchy due to the level of services currently available. When developers submit relevant planning applications for development on site R25 and R26, detailed considerations including but not limited to design, responding to the local characters, flood mitigations, highways access and safety, infrastructure contributions, will be assessed and addressed at the planning application stage, informed by site specific detailed evidence. The Council has consulted Epping Forest District Council and statutory bodies such as Environment Agency, Natural England and Essex County Council (Local Highways Authority, Lead Local Flood Authority, Lead Local Education Authority) throughout the plan-making process and will remain engaged with them at the planning application process.

Action:

None required.

29750**Object**

Respondent: Mr Craig Stevens [4958]

29759**Object**

Respondent: Mrs Judith Bowland [8642]

29767**Object**

Respondent: Bernard Allen [8830]

29772**Object**

Respondent: Mr Callum Cartwright [8370]

29776**Object**

Respondent: Mr Scott Gosling [9112]

29780	Object
Respondent: Mr Christopher Gill [8492]	
29793	Object
Respondent: Blackmore Village Hall/Parish Council (Roger Keeble) [301]	
29857	Object
Respondent: Mrs Edna Williams [4728]	
29901	Object
Respondent: Miss Claire Grant [8478]	
29907	Object
Respondent: Mr Nicholas Griffiths [9129]	
29914	Object
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30470	Object
Respondent: Mrs Susan Hood [9181]	
30474	Object
Respondent: Mr Ken Holmes [8691]	
30489	Object
Respondent: Mr James Harris [8678]	
30519	Object
Respondent: Mr Peter Ryan [4937]	
30524	Object
Respondent: Ms Jane Rogers [9183]	
30531	Object
Respondent: Ms. Donna Toomey [8024]	
30536	Object
Respondent: Mrs Joanne Ryan [8889]	

30544	Object
Respondent: Mrs Joan Westover [4635]	
30557	Object
Respondent: Mr John Richardson [4858]	
30589	Object
Respondent: Mr Raymond Thompson [4840]	
30598	Object
Respondent: Mr Gary Durdant-Pead [8326]	
30607	Object
Respondent: Mrs Rita Tuffey [4620]	
30611	Object
Respondent: Mrs Louise Roast [9188]	
30621	Object
Respondent: Mrs Natalie Walters [8959]	
30626	Object
Respondent: Mr Nicholas Wilkinson [8406]	
30635	Object
Respondent: Mr Derek Tillet [8923]	
30652	Object
Respondent: Mrs Christine Tabor [8427]	
30657	Object
Respondent: Mr Frank Tabor [8424]	

30668	Object
Respondent: Mrs Samantha Stratton [9196]	
30674	Object
Respondent: Mr Kyle Pounds [9198]	
30685	Object
Respondent: Mrs Julie Pounds [8608]	
30695	Object
Respondent: Mrs Sophia Severn [9202]	
30700	Object
Respondent: Mr Ron Beazley [4831]	
30707	Object
Respondent: Mr Keith Pope [9206]	
30715	Object
Respondent: Mr Lloyd Piper [8616]	
30723	Object
Respondent: Mrs Debbie Spencer [6959]	
30732	Object
Respondent: Mrs Faye Osborne [8458]	
30739	Object
Respondent: Mr Darryl Pounds [8609]	
30745	Object
Respondent: Mr Richard Smart [9208]	

30759	Object
Respondent: Mr Ronald Sanders [9209]	
30766	Object
Respondent: Mrs Sandra Price [9210]	
30774	Object
Respondent: Mr David Olley [8461]	
30783	Object
Respondent: Mrs Jemma Olley [8462]	
30787	Object
Respondent: Mr Raymond Price [9211]	
30805	Object
Respondent: Mr Stephen Slaughter [9041]	
30819	Object
Respondent: Mr Terence Stenning [8544]	
30826	Object
Respondent: Ms Mollie Stenning [9215]	
29638	Object
Respondent: Mrs Joanne Gill [4758]	
29642	Object
Respondent: Mrs Elisabeth Taylor [2918]	
29646	Object
Respondent: Mr Gary Taylor [8905]	

29743

Object

Respondent: Dr Murray Wood [7003]

29814

Object

Respondent: Mr John Hughes [4500]

29820

Object

Respondent: Mr Gary Sanders [4923]

29842

Object

Respondent: Ms Victoria Sanders [8482]

30508

Object

Respondent: Blackmore Village Heritage Association [8568]

Agent: Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]

30560

Object

Respondent: Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]

MM6

9546

Support

Summary of representations:

Request that the Inspector reviews the MM to ensure funding via S106 or CIL is included for health services to meet population requirements should include all health providers such as emergency ambulance services, patient transport, acute, community and mental health, in addition to primary care as they are all impacted by population growth.

Summary of representation changes to plan:

Multiple developments of less than 50 units impacts as much on healthcare services in the same way as single large developments and consideration is requested that a mechanism for funding via developments of less than 50 units is developed and made available to healthcare services and providers.

Response:

Support is welcome.

Disagree with the review request; the term 'infrastructure' used in the Plan, as defined in the Glossary, refers to 'any structure, building, system facility and/or provision required by an area for its social and/or economic function and/or wellbeing'. It goes on to refer to 'healthcare' in the broad sense and does not include primary care exclusively.

As per proposed modifications, part B of policy MG05 requires that where a development proposal requires additional infrastructure capacity, to be deemed acceptable, mitigation measures must be agreed with the local planning authority and the appropriate infrastructure provider.

The Council considers such wording is sufficient in enabling consideration of infrastructure capacity and appropriate infrastructure provider, be it health, education, energy, public transport or any other infrastructure provider.

Action:

No action required

30268

Support

Respondent: East of England Ambulance Service (Ms Zoë May, Head of Business Relationships) [9164]

9548

Support

Summary of representations:

Whilst reference to keeping takeaways limited and not within distance of schools there is the consideration that children will seek out these outlets. Perhaps takeaways needs to offer healthy options or be of a healthier proposition in the first place. Also it's the type of takeaways too as this can affect an area in terms of feel and location.

Summary of representation changes to plan:

None identified

Response:

Support welcomed. Observations noted; these issues will be considered in detail at the application stage rather than at the overarching planning policy level.

Action:

No action required.

29713

Support

Respondent: Gita Mackintosh [7214]

9749**Object****Summary of representations:**

Requirement of HIA for hot food takeaways strongly supported by ECC given its responsibilities for Public Health. ... > Should be required both within, and outside, designated town, district or local centres to ensure borough wide consideration. This is not currently in criterion A.

HIA level of detail/work required is proportionate (type/nature of development/location). Stepped process allows consideration of HIA type on case by case basis (level of detail varies-desktop based short review/full comprehensive assessment). Approach is outlined in EPOA HIA Guidance Note – Essex Healthy Places – Advice Notes for Planners, Developers and Designers.

Summary of representation changes to plan:

Review proposed policy to include requirement for HIA to be considered for all hot food takeaways borough wide, not just outside of town, district or local centres.

Response:

Disagree - Requirements for when an HIA would be required was scrutinised in great detail during the local plan hearing session. Due to lack of local evidence to support all hot food takeaways to undertake an HIA this requirement has been removed.

Action:

None required

29704**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM7**9545****Support****Summary of representations:**

The proposed modifications to Policy SP04 and its supporting text are considered to be consistent with national policy.

Summary of representation changes to plan:

None required

Response:

Support welcomed.

Action:

No action required.

29480**Support**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

29867**Support**

Respondent: Land North of Shenfield Developer Group [9122]

Agent: Barton Willmore (Ms Jane Piper) [9123]

29868

Support

Respondent: Land North of Shenfield Developer Group [9122]**Agent:** Barton Willmore (Ms Jane Piper) [9123]

30156

Support

Respondent: S&J Padfield and Partners (SJP) [6122]**Agent:** Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

30227

Support

Respondent: St Modwen Properties PLC and S&J Padfield and Partners [8835]**Agent:** Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

30269

Support

Respondent: East of England Ambulance Service (Ms Zoë May, Head of Business Relationships) [9164]

9781

Object

Summary of representations:

The LDP states that 'permission will only be granted if there is sufficient appropriate infrastructure capacity'. In the case of sites R25 and R26 (Blackmore) there is insufficient capacity in the local primary school to accommodate children from another 70 houses, likely around 30 children, whereas the school is already overcapacity and has a waiting list, and there is no room to extend the school further. Also the sewage infrastructure currently cannot cope with the current housing levels, so that will cause further sewage overflows into the clean water system. Also the roads are inadequate to cope with more traffic.

Summary of representation changes to plan:

Remove the sites R25 and R26 from the plan and replace them with sites that are better suited in terms of schooling, roads and sewerage infrastructure.

Response:

As part of the plan-making process, the Council has prepared an Infrastructure Delivery Plan identifying required infrastructure to support the level of planned growth; this has not identified infrastructure issues that would prevent delivery of this number of homes. This document is live and will be updated periodically based on the most up to date evidence and in liaison with service providers, statutory bodies and stakeholders to ensure a timely identification and delivery of required infrastructure. When developers submit relevant planning applications for development on site R25 and R26, detailed considerations including but not limited to design, responding to the local characters, flood mitigations, highways access and safety, sustainable transport measures, infrastructure contributions, air quality, and biodiversity will be assessed and addressed at the planning application stage, informed by site specific detailed evidence. The Council has consulted Epping Forest District Council and statutory bodies such as Environment Agency, Natural England and Essex County Council (Local Highways Authority, Lead Local Flood Authority, Lead Local Education Authority) throughout the plan-making process and will remain engaged with them at the planning application process.

Action:

None required

29484

Object

Respondent: Mr Richard Thwaite [6964]

9783

Object

Summary of representations:

Proposed change requires contributions to infrastructure 'as set out in the Infrastructure Delivery Plan...where such contributions are compliant with national policy and the legal tests'. The tying of contributions to the IDP is considered somewhat problematic as it is a live document subject to change and the IDP is not subject to a level of scrutiny to ensure the contributions it demands are justified, reasonable and viable, in the same way a Local Plan or CIL Charging Schedule would be.

Summary of representation changes to plan:

Suggest mention of the IDP is moved to the supporting text. Further modifications are required to make it clear that contributions to transport infrastructure will only be sought where they are directly related to the development proposed in question, and necessary to make it acceptable in planning terms. Suggested additional text "...and having regard to all applicable legal requirements including Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended))..."

Response:

Disagree, CIL Regulation 122 (which require planning obligations to be necessary, related to development, fairly and reasonably related in scale and kind to development) states that this regulation applies at the point of planning application determination. Compliance to CIL Regulation 122 and paragraph 57 of the NPPF therefore will be dealt with at the planning application stage. It is not necessary to repeat national policy and guidance in the policy

Action:

No changes required

30155

Object

Respondent: S&J Padfield and Partners (SJP) [6122]**Agent:** Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

30226

Object

Respondent: St Modwen Properties PLC and S&J Padfield and Partners [8835]**Agent:** Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

30277

Object

Respondent: Stonebond Properties Ltd [5948]**Agent:** Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

MM10

9784

Object

Summary of representations:

ECC as the highway and transportation authority considers that the review policy MG06 gives Brentwood Borough Council the opportunity to address not only the highways and transportation matters raised by National Highways, but also those matters raised by ECC, as set out in Hearing Statement F76A (its response to F65 the latest published Transport Assessment) and reiterated at the EIP. In particular the summaries set out in Paragraphs 1.8 and 1.9 of F76A. Criterion D of Policy MG06 should be modified to explicitly reflect this position.

Summary of representation changes to plan:

Add after D.i.:

- d. other junctions on the local highway network where unmet demand has been identified, for example Wilsons Corner, and junctions along the A1023
- ii. the need to provide a borough wide sustainable transport strategy

Response:

Disagree, suggested amendments not considered necessary to make the plan sound. Suggested 4 (d) not considered necessary on the basis that the list of junctions under a, b and c were made due to them being larger scale strategic matters. The consideration of other local junctions is not precluded as the wording of part 4 of the policy covers the need to review transport and highway issues to cater for local plan growth in consultation with National Highways and Essex County Council. In addition, the need to consider sustainable transport measures is included in part 4 (i) of the policy.

Action:

None required

29622

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9786**Object****Summary of representations:**

There must be a reasonable level of certainty that the partial review of the plan will take place. We do not consider the policy as presently worded provides sufficient certainty. The proposed wording does not compel the Council to progress the Local Plan review beyond submission and to adoption;

It is also not clear what will happen in the event that any of the objectives listed in Policy MG06 are not met. Due to the Borough being predominantly Green Belt failure to progress a Local Plan review is highly likely to result in development needs going unmet;

Policy MG06 will need to include flexibility to enable certain sites to come forward for development if in the event BBC does not meet its own commitment.

Summary of representation changes to plan:

- Suggest the policy incorporates a commitment to progressing the Local Plan review to adoption, with an appropriate timeframe set;
- Propose amendments to Policy MG06 to include requirement to complete a call for sites and publish Reg 18 within 12 months of adoption. Amend the 28 month period to 24 month;
- In addition the policy should expressly state that if the plan review is progressed in accordance with its objectives and the Council is unable to demonstrate a five year housing land supply and/or the Housing Delivery Test indicates delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years, then the plan is considered out of date and housing development in the Green Belt should be considered to fall within the purview of Very Special Circumstances.

Response:

Disagree, the Council considers the Policy wording of proposed modification MM10, which proposes new Policy MG06: Local Plan Review, provides certainty the Council will commence an immediate partial review of the Local Plan and commits the Council to submission of the review for examination within 28 months, upon the adoption of the LDP. Upon submission the timeframe to adoption will be guided by the Planning Inspectorate.

- Suggested amendment to 24 month period is not considered achievable. A 28 month period is considered, by the Council, to be the minimum period required for the preparation and submission of a partial review.

- Suggested change regarding very special circumstance would not be in conformity with national policy. It is not for the Plan making process to determine whether very special circumstances apply.

Action:

No changes required

29824**Object**

Respondent: M Scott Properties Ltd [8054]

Agent: M Scott Properties Ltd (Miss Victoria Cutmore) [7245]

29829**Object**

Respondent: Tesco Stores Limited [3856]

Agent: GL Hearn (Mr Selwyn Atkinson) [8822]

29887**Object**

Respondent: GL Hearn [252]

Agent: GL Hearn (Mr Selwyn Atkinson) [8822]

29908**Object****Respondent:** U+I Group [9127]**Agent:** Chilmark Consulting Limited (Mr. Mike Taylor) [2703]

30028**Object****Respondent:** Hallam Land Management Ltd [2353]**Agent:** Marrons Planning (Mr Gary Stephens, Planning Director) [8825]

30029**Object****Respondent:** Hallam Land Management Ltd [2353]**Agent:** Marrons Planning (Mr Gary Stephens, Planning Director) [8825]

30151**Object****Respondent:** Clearbrook Group Plc [2930]**Agent:** Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

30152**Object****Respondent:** Turn2us [6753]**Agent:** Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

30161**Object****Respondent:** S&J Padfield and Partners (SJP) [6122]**Agent:** Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

9787**Object****Summary of representations:**

Object to the 28 month period identified for submission of the review. Agree that any review should commence immediately following adoption, unclear why 28 months has been specified, and what assumptions this is based on. Consider that a 24 month period would be appropriate.

The Green Belt review should not only undertake an assessment of individual parcels against the purposes of Green Belt but also consider the suitability of releasing particular sites from the Green Belt in order to meet the identified need.

The Policy is not clear on what would happen in the event that the review is not prepared and submitted for examination in accordance with the timescales set out in the first paragraph of the policy. Nothing is mentioned in the monitoring framework to this effect either;

Summary of representation changes to plan:

Therefore consider it necessary to include a section in the policy which clarifies that should the requirements of the policy not be met, relevant policies for the supply of housing will be considered out of date.

Response:

Regarding 24 month period: Disagree, suggested amendment is not considered achievable. A 28 month period is considered, by the Council, to be the minimum period required for the preparation and submission of a partial review.

Regarding Green Belt review: Noted, this will be a matter to consider upon commencement of review.

Regarding what would happen in the event that the review is not prepared and submitted and suggested changes:

Disagree, this would be a matter to be determined through the application of national policy

Action:

No change required

30275**Object**

Respondent: EA Strategic Land LLP [279]

Agent: Icen Projects Limited (Mr Stuart Mills, Associate) [9165]

9791**Object****Summary of representations:**

Concerns that there is a risk of development being delayed on the basis of transport improvements being determined only at the point of reviewing the Local Plan. Concerned that the proposed policy has just delayed the policy considerations and not necessarily dealt with National Highways actual concerns about the M25 junctions. It is assumed that BBC reached an agreement with National Highways and the Local Plan examination Inspectors on the wording of MG06, and the consequent delay in consideration of the M25 junction issues. The Developer group seeks assurance that this agreement with National Highways will still hold whilst the planning applications for Land north of Shenfield are being considered and will not therefore, attract an objection by National Highways on the grounds that this matter has not been resolved at this stage.

Summary of representation changes to plan:

Considers it necessary for the Council to make the following change to policy MG06D: "a review of transport and highway issues to cater for local plan growth throughout the period of the review (in consultation with National Highways and Essex County Council) unless otherwise agreed with National Highways prior to the Local Plan review , taking into account ..."

Response:

Disagree, not considered appropriate or necessary to make change to policy. Policy is effective as written.

Action:

None required

29869**Object**

Respondent: Land North of Shenfield Developer Group [9122]

Agent: Barton Willmore (Ms Jane Piper) [9123]

29870**Object**

Respondent: Land North of Shenfield Developer Group [9122]

Agent: Barton Willmore (Ms Jane Piper) [9123]

9806**Object****Summary of representations:**

Do not support the principle of an early review. An early review will not remedy the issue shortfall of supply early in the plan period as it will not result in additional sites being allocated for several years.

Summary of representation changes to plan:

Given the permanence of the Green Belt boundaries and the emphasis at paragraph 140 of the NPPF on these boundaries enduring beyond the Plan period, we consider it would be more appropriate to allocate additional sites now rather than postponing this to an updated version of the Plan.

Response:

Disagree, there would be significant timeframe implications in amending the plan now to add in additional sites which would unduly delay the delivery of housing on allocated sites. .

Action:

None required

30274

Object

Respondent: EA Strategic Land LLP [279]

Agent: Icen Projects Limited (Mr Stuart Mills, Associate) [9165]

9809

Object

Summary of representations:

Object as an immediate partial review of the plan does not include a commitment to meet the full new employment land need.

Summary of representation changes to plan:

Include a commitment to meet the new employment land need of at least 58.24ha in full as part of the immediate partial review of the Plan.

Response:

Disagree, there was no identified shortfall in employment supply identified through the hearing sessions. The early review of the plan is to address housing supply issues.

Action:

None required

29832

Object

Respondent: MM Properties Ltd [6076]

Agent: Savills UK (Mr Gregory Evans, Associate) [9117]

9831**Object****Summary of representations:**

The Framework requires (paragraph 61) that strategic policies should (in addition to the Local Housing Need figure) take into account any unmet needs that cannot be met within neighbouring areas when establishing the amount of housing to be planned for. For the partial review to exclude any consideration of unmet needs is contrary to national policy.

Summary of representation changes to plan:

The wording of the policy should therefore be amended to include reference to addressing unmet needs from neighbouring areas. This is important in the context of the preparation of the South Essex Joint Strategic Plan which will provide a framework for the partial review. The first sentence of Policy MG10 should be re-worded as follows: 'The Council will bring forward a partial review of the Plan with the objective of meeting in full the Objectively Assessed Housing Needs, including any unmet needs from neighbouring areas as agreed with other authorities.' Reference should be made to addressing unmet needs from neighbouring areas within the list of specific matters to be addressed. An additional sub-heading should be added to the list within the policy related to 'addressing unmet housing needs from neighbouring areas as agreed with other authorities.'

Response:

Disagree. The suggested amendments to the policy is not appropriate as any unmet need from a neighbouring authority, if it exists, and commitment to address it would have to be established via the Duty to Cooperate or an established joint working mechanism.

Action:

None required

30027**Object**

Respondent: Hallam Land Management Ltd [2353]

Agent: Marrons Planning (Mr Gary Stephens, Planning Director) [8825]

9859**Object****Summary of representations:**

Our requirements moving forward are to assess each planning proposal on an individual basis under a situation of either no adopted Local Plan or an adopted Plan subject to immediate review. Mitigation requirements will be considered on an individual or if possible pooled basis depending upon the timing and location of individual applications. Any subsequent Local Plan (if an adopted Plan does not exist) or Local Plan review will then need to assess the impacts of all non-consented development at the time of submission and examination in public, including any non-consented development as part of an adopted Plan if applicable and suitable mitigation will be required for all non-consented development. We feel it important to make this point to clarify our position and avoid any uncertainty in future on the status of any Local Plan related development and the mitigation requirements of the M25 and A12 in Brentwood.

Summary of representation changes to plan:

Paragraph D should be modified to state "a review of transport and highway issues to cater for all local plan growth including all growth without an existing planning permission up to the end of the review period in consultation with National Highways...".

Response:

The Council considers the suggested amendments to be unnecessary for soundness as should any significant proposals come forward in advance of the plan review National Highways will be consulted.

Action:

No action required.

30840**Object**

Respondent: National Highways (Nigel Walkden) [4668]

MM13**9589****Support****Summary of representations:**

Revised policy acknowledges that the requirement for a minimum of 10% of predicted energy needs of a development to be from renewable energy may not be possible or appropriate on site, and therefore allows for flexibility to be provided off site or funded through a s106.

Summary of representation changes to plan:

NA

Response:

Support welcome

Action:

None required

29871**Support**

Respondent: Land North of Shenfield Developer Group [9122]

Agent: Barton Willmore (Ms Jane Piper) [9123]

29876

Support

Respondent: Stonebond Properties Ltd [5948]**Agent:** Phase 2 Planning and Development Ltd (Mr. Michael Calder, Associate) [3814]

MM14

9822

Object

Summary of representations:

The proposals at R25 and R26 will cause increased flood risk, exacerbated by climate change. Fields that capture water will be overbuilt, increasing surface water run off into the Green and surrounding lanes. Should these developments go ahead will the Borough Council take responsibility for the reparation of damages for residents if and when their homes are flooded due to this development taking place?

While flood risk problems have been highlighted to BBC extensively, there is additional risk from climate change and the growing body of evidence that increased rainfall is expected in the coming years. In addition, it appears that no real attempt has been made to address the increased flooding risk presented by the proposed development, and how climate change exacerbates this, which raises questions of due process.

Summary of representation changes to plan:

Blackmore village is not suitable for increased housing development given its topography and river system and does not have the water management infrastructure to handle increased surface water run off. Improvements to the developments themselves will only transfer the flooding problem into other parts of Blackmore, principally the Conservation area, and lead to more flooding of roads, making existing problems worse. More suitable sites need to be found.

Response:

Noted. As part of the plan-making process and assessing site allocations, the Council has consulted neighbouring authorities and statutory bodies such as Environment Agency, Natural England and Essex County Council, Lead Local Flood Authority, Thames Water and Anglian Water. No identified sewage capacity was raised that would prevent the delivery of this number of homes. When developers submit relevant planning applications for development on site R25 and R26, detailed considerations including but not limited to flood risk and flood mitigation measures will be assessed and addressed at the planning application stage, informed by site specific detailed evidence.

Action:

None required

29834

Object

Respondent: Mr Graham Hesketh [8634]

29468

Object

Respondent: Mr Andrew Borton [9089]

29476

Object

Respondent: Mr Colin Herman [9090]

30245	Object
Respondent: Mr Martin Clark [2456]	
30255	Object
Respondent: Mr Richard Reed [4708]	
30259	Object
Respondent: Mrs Terri Reed [4303]	
30384	Object
Respondent: Mr John Lester [4396]	
30439	Object
Respondent: Mr Kevin Wood [6965]	
30492	Object
Respondent: Mrs Lucille Foreman [8574]	
30499	Object
Respondent: Mr Colin Foreman [4394]	
30581	Object
Respondent: Mrs Elaine Smith [5189]	
29710	Object
Respondent: Mr Conrad Dixon [8688]	
30006	Object
Respondent: Ms Linda Cearns [5013]	

MM15

9744

Object

Summary of representations:

Objects to modifications to part B of the policy which seeks to group sites together that are capable of delivering more than 500 units and requires them to include energy masterplans that incorporate a decentralised energy infrastructure. Concerned that these modifications proposed will have significant impacts on scheme viability and deliverability, which has not been considered within the Local Plan evidence base.

Summary of representation changes to plan:

Seeking the inclusion of 'where possible' at the beginning of Policy BE03 part B.

Response:

Disagree, the Local Plan policy requirements, including those of Policy BE03, were subject to a robust Viability Assessment as part of the Local Plan preparation. Detailed site-specific viability assessment can be undertaken and considered on a case by case basis at the application stage. As currently worded, the policy allows for viability consideration and alternative solutions.

Action:

No action required.

29879

Object

Respondent: Stonebond Properties Ltd [5948]

Agent: Phase 2 Planning and Development Ltd (Mr. Michael Calder, Associate) [3814]

9748

Object

Summary of representations:

As currently drafted, a developer (of a scheme over 500 homes) is forced to consider a decentralised system before any other alternatives. It does not allow a developer to demonstrate that alternative solutions could deliver the overall aim of the policy.

Summary of representation changes to plan:

Objects to the wording of B(ii and iii) and considers that the whole of part B should be rewritten to allow a developer to demonstrate that an appropriate strategy has been included in the development.

Response:

Disagree, The Council considers that B (iii) allows for flexibility for lower carbon alternatives providing that applicants have fully assessed all reasonably available options for its incorporation and delivery.

Action:

No action required.

29872

Object

Respondent: Land North of Shenfield Developer Group [9122]

Agent: Barton Willmore (Ms Jane Piper) [9123]

MM19

9585

Support

Summary of representations:

The proposed modifications to paragraph 5.68 are considered acceptable. The Water Framework Directive (WFD) is a driver for the need for water quality improvements. However, the inclusion of the paragraph as originally submitted within the section relating to SuDS was confusing because ECC as LLFA do not use the criteria associated with water body status to assess pollution control delivered by SuDS.

Summary of representation changes to plan:

NA

Response:

Support welcomed

Action:

No action required

29481

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9790

Object

Summary of representations:

Not Effective

Not Consistent with National Policy

ECC as Lead Local Flood Authority (LLFA) for BBC are satisfied in principle with the amended policy for BE08 Sustainable Drainage.

However, criterion D needs to include reference to Flood Risk Assessment to ensure the link to the Flood Risk Policy in the Local Plan is clear to applicants and decision makers.

Summary of representation changes to plan:

Insert additional wording 'and Flood Risk Assessment' after the words 'Drainage Strategy' in the first sentence of criterion D of Policy BE08 - Sustainable Drainage.

Response:

Agree, modify policy as suggested to make effective.

Action:

Amend criterion D of Policy BE08 as suggested.

29623

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9810**Object****Summary of representations:**

Blackmore frequently floods at various locations around the village. It is located in a critical drainage area. It won't be possible to build 70 houses and associated roads and pavements without creating more run-off than would have been if they had been left as fields.

Summary of representation changes to plan:

Remove sites R25 and R26 from the plan. BBC should engage with the environment agency to carry out research into the impact of building on an area subject to regular flooding, being mindful of the impact of climate change.

Response:

Policy BE03 is considered effective and sound. The Council has consulted with Essex County Council as the Lead Local Flood Authority on flood risk and sustainable drainage, and has effectively engaged throughout the Plan making process with statutory bodies such as the Environment Agency. Detailed site considerations will be assessed and addressed at the planning application stage, informed by site specific detailed evidence, which will include a Flood Risk Assessment in Critical Drainage Areas.

Action:

No action required.

29835**Object**

Respondent: Mr Graham Hesketh [8634]

29469**Object**

Respondent: Mr Andrew Borton [9089]

29489**Object**

Respondent: Mr Richard Thwaite [6964]

29858**Object**

Respondent: Mrs Edna Williams [4728]

30256**Object**

Respondent: Mr Richard Reed [4708]

30260**Object**

Respondent: Mrs Terri Reed [4303]

30385**Object****Respondent:** Mr John Lester [4396]**30493****Object****Respondent:** Mrs Lucille Foreman [8574]**30500****Object****Respondent:** Mr Colin Foreman [4394]**30582****Object****Respondent:** Mrs Elaine Smith [5189]**9820****Object****Summary of representations:**

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.

Summary of representation changes to plan:

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.

Response:

The Council has consulted with Essex County Council as the Lead Local Flood Authority on flood risk and sustainable drainage, and has effectively engaged throughout the Plan making process with statutory bodies such as the Environment Agency. The Council considers that site allocations R25 and R26 align with its Strategic Objectives. Detailed site considerations will be assessed and addressed at the planning application stage, informed by site specific detailed evidence, which will include a Flood Risk Assessment in Critical Drainage Areas.

Action:

No action required.

30420**Object****Respondent:** Ms Patricia Taylor [6880]

9824**Object****Summary of representations:**

The existing current sewerage system in Blackmore is already at more than capacity. More houses will make the situation worse and the number of houses proposed will make the situation much worse.

Summary of representation changes to plan:

The number of proposed new houses needs to be decreased from the previous proposal not increased as it is in this amendment.

Response:

Policy BE02: Water Efficiency and Management, effectively addresses this concern.

Action:

No action required.

29610**Object**

Respondent: Mrs Helen Whalley [4233]

MM22**9577****Support****Summary of representations:**

Support

Summary of representation changes to plan:

Part C of BE08 may need refinement when finalising the Plan

Response:

Support welcome

Action:

TfL's suggestion noted

29483**Support**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

29485**Support**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

29715**Support**

Respondent: Gita Mackintosh [7214]

29810

Support

Respondent: Transport for London [2013]**Agent:** Transport for London (Mr Richard Carr, Principle Planner (Spatial Planning)) [7185]

9764

Object

Summary of representations:

Not Effective

ECC as highway and transportation authority considers that the words '(where appropriate)' in the first paragraph of the Policy are unnecessary. The words 'reasonable and proportionate' provide the necessary clarity to applicants and decision makers.

Summary of representation changes to plan:

Delete '(where appropriate)' from the first paragraph of Policy BE11.

Response:

Agree, delete '(where appropriate)' from the first paragraph of Policy BE11 to make the policy effective.

Action:

Delete '(where appropriate)' from the first paragraph of Policy BE11.

29538

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9765

Object

Summary of representations:

Not Effective

ECC as highway and transportation authority welcomes inclusion of criterion c. it provides clarity on bodies to be engaged with on strategic transport infrastructure matters. However, clarification is sought on the definition of transport evidence. As currently written, it is unclear whether this relates to transport evidence for the Local Plan, that accompanies planning applications, and/or accompanies transport schemes from statutory bodies/stakeholders. Evidence accompanying planning applications and transport schemes provides detail and up-to-date positions which supplement the strategic overview of Local Plan evidence. It is recommended that this is clarified in supporting text to this policy.

Summary of representation changes to plan:

Include clarification on the definition of transport evidence in supporting text to Policy BE11.

Response:

Disagree. The term transport evidence is self-explanatory; it does not exclude detailed evidence to be submitted at the planning application stage nor does it information from statutory bodies and stakeholders at a later stage.

Action:

No action required.

29539

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9767

Object

Summary of representations:

Not Effective

Clarification is sought with regards to the status and progress with South Brentwood Growth Corridor Masterplan referenced in criterion i in paragraph 5.102. BBC should consider providing further narrative in the paragraph to explain this.

This reflects ECC's Reg.19 Rep 22350 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

Summary of representation changes to plan:

BBC should seek to clarify the status and progress of the South Brentwood Growth Corridor Masterplan referenced in criterion i. in paragraph 5.102. BBC should consider providing further narrative in paragraph 5.102 to explain the status and progress of the South Brentwood Growth Corridor Masterplan.

Response:

Agree that part of paragraph 5.102 should be updated to reflect the latest progress regarding the South Brentwood Growth Corridor Masterplan.

Action:

Replace the last sentence with: "In addition, the Council's collaborative work with multiple stakeholders of different interests focussing on the South Brentwood Growth Corridor has resulted in a number of published documents, including the South Brentwood Growth Corridor: A Sustainable Transport Integration Vision and the DHGV Framework Masterplan Document."

29540

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM22

9768

Object

Summary of representations:

Not Justified

Not Effective

The modification does not reflect in the supporting text the most up to date position and reference to the Transport Assessment for the Local Plan. Whilst it is recognised that this is proposed to be addressed in paragraph 5.93, it also needs reflecting in paragraphs 5.96 c., 5.101, and 5.104.

Summary of representation changes to plan:

Update paragraphs 5.96 c., 5.101, and 5.104 to provide the up to date references to and position of the Transport Assessment for the Local Plan.

Response:

Agree, update reference for Transport Assessment from 2018 to 2021 in paragraphs 5.96 c, 5.101 and 5.104 to make effective

Action:

Update reference for Transport Assessment from 2018 to 2021 in paragraphs 5.96 c, 5.101 and 5.104.

29541

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9770

Object

Summary of representations:

Effective

The inclusion of additional wording to paragraph 5.102 at iv. ensures applicants and decision makers are aware of the A127 Task Force and its work.

This modification in part addresses ECC's Reg.19 Rep 22351 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

However, to reflect the current position and to avoid repetition with existing text within other parts of paragraph 5.102 the final sentence of iv. should be deleted.

Summary of representation changes to plan:

Delete the final sentence of iv. of paragraph 5.102.

Response:

Agree that the additional final sentence can be removed to make the policy effective.

Action:

Delete the final sentence of iv. of paragraph 5.102.

29571

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9773

Object

Summary of representations:

Not Effective

Strategic transport infrastructure is required to be delivered to support the Local Plan growth. It is not considered that the word "critical" is necessary in this context. It is therefore recommended that paragraph 5.90 is modified to reflect this.

Summary of representation changes to plan:

Replace words 'critical to' with 'required for' in paragraph 5.90.

Response:

Disagree. The wording as proposed in the Main Modifications Schedule is consistent with the Infrastructure Delivery Plan categorisation, particularly category 1 infrastructure which is the focus of this policy.

Action:

No action required.

29624

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9775

Object

Summary of representations:

Reviewing the wording of the proposed amendments to Policy BE08 (formerly BE11), the policy as written is not justified. This is because contributions could be sought from developments for specific infrastructure that do not directly relate to it as required by Paragraph 57 of the NPPF and article 122 of the 2021 Community Infrastructure Levy Regulations (as amended). For example, Dunton Hills Garden Village on the proposed wording could be required to contribute to circulation arrangements, public realm and multimodal integration around Brentwood, Shenfield and Ingatestone stations; which would not be appropriate.

Summary of representation changes to plan:

Amend policy BE08 as follow: "In order to support and address the cumulative impacts of planned and other incremental growth, both allocated development within the Local Plan and any other development proposals may be required to (where appropriate) provide reasonable and proportionate contributions to required mitigation measures to strategic transport infrastructure relevant to that allocation/development proposal, including: ..." Amendment to ensure the policy is justified and to accord with the relevant tests associated with planning obligations (NPPF, Paragraph 57).

Response:

Disagree, CIL Regulation 122 (which require planning obligations to be necessary, related to development, fairly and reasonably related in scale and kind to development) states that this regulation applies at the point of planning application determination. Compliance to CIL Regulation 122 and paragraph 57 of the NPPF therefore will be dealt with at the planning application stage. It is not necessary to repeat national policy and guidance in the policy. No changes required.

Action:

No action required.

30064**Object**

Respondent: CEG Land Promotions Limited [5050]**Agent:** Lichfields (Ms Rachel Clements, Associate Director) [9145]

9777**Object**

Summary of representations:

The proposed wording references the need for contributions from developments towards transport infrastructure to be reasonable and proportionate, but does not acknowledge the other tests of a legally-compliant contribution.

Summary of representation changes to plan:

MM22 should be subject to further modifications making clear that contributions to transport infrastructure will only be sought where they are directly related to the development proposal in question, and necessary to make it acceptable in planning terms. For example: "In order to support and address the cumulative impacts of planned and other incremental growth, allocated development within the Local Plan and any other development proposals shall (where appropriate and having regard to all applicable legal requirements including Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended)) provide reasonable and proportionate contributions to required mitigation measures to strategic transport infrastructure, including [...]".

Response:

Disagree, CIL Regulation 122 (which require planning obligations to be necessary, related to development, fairly and reasonably related in scale and kind to development) states that this regulation applies at the point of planning application determination. Compliance to CIL Regulation 122 and paragraph 57 of the NPPF therefore will be dealt with at the planning application stage. It is not necessary to repeat national policy and guidance in the policy. No changes required.

Action:

No action required.

30162**Object**

Respondent: S&J Padfield and Partners (SJP) [6122]**Agent:** Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

9778

Object

Summary of representations:

MM22 should be subject to further modifications making clear that contributions to transport infrastructure will only be sought where they are directly related to development proposal in question, and necessary to make it acceptable in planning terms.

Summary of representation changes to plan:

Amend to read: "In order to support and address the cumulative impacts of planned and other incremental growth, allocated development within the Local Plan and any other development proposals shall (where appropriate and having regard to all applicable legal requirements including Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended)) provide reasonable and proportionate contributions to required mitigation measures to strategic transport infrastructure, including [...]"

Response:

Disagree, CIL Regulation 122 (which require planning obligations to be necessary, related to development, fairly and reasonably related in scale and kind to development) states that this regulation applies at the point of planning application determination. Compliance to CIL Regulation 122 and paragraph 57 of the NPPF therefore will be dealt with at the planning application stage. It is not necessary to repeat national policy and guidance in the policy. No changes required.

Action:

No action required.

30228

Object

Respondent: St Modwen Properties PLC and S&J Padfield and Partners [8835]

Agent: Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

9780

Object

Summary of representations:

Current wording could result in the decision maker inferring proportionate contributions towards highway infrastructure should be required of developments, even if such infrastructure was not directly related to the development proposed and/or unnecessary to make the development acceptable in planning terms.

Summary of representation changes to plan:

Policy should be amended to make clear that contributions to transport infrastructure will only be sought where they are directly related to development proposals in question, and to make it acceptable in planning terms.

Response:

Disagree, CIL Regulation 122 (which require planning obligations to be necessary, related to development, fairly and reasonably related in scale and kind to development) states that this regulation applies at the point of planning application determination. Compliance to CIL Regulation 122 and paragraph 57 of the NPPF therefore will be dealt with at the planning application stage. It is not necessary to repeat national policy and guidance in the policy. No changes required.

Action:

No action required.

30285

Object

Respondent: Stonebond Properties Ltd [5948]**Agent:** Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

9860

Object

Summary of representations:

Our requirements moving forward are to assess each planning proposal on an individual basis under a situation of either no adopted Local Plan or an adopted Plan subject to immediate review. Mitigation requirements will be considered on an individual or if possible pooled basis depending upon the timing and location of individual applications. Any subsequent Local Plan (if an adopted Plan does not exist) or Local Plan review will then need to assess the impacts of all non-consented development at the time of submission and examination in public, including any non-consented development as part of an adopted Plan if applicable and suitable mitigation will be required for all non-consented development. We feel it important to make this point to clarify our position and avoid any uncertainty in future on the status of any Local Plan related development and the mitigation requirements of the M25 and A12 in Brentwood.

Summary of representation changes to plan:

Paragraph C should be modified to state "improvements to the highway network as deemed necessary by transport evidence (either existing or through future transport assessments submitted as part of development planning applications) or as agreed by National Highways...".

Response:

The Council considers the suggested amendments to be unnecessary for soundness as should any significant proposals come forward in advance of the plan review National Highways will be consulted.

Action:

The Council considers the suggested amendments to be unnecessary for soundness as should any significant proposals come forward in advance of the plan review National Highways will be consulted.

30841

Object

Respondent: National Highways (Nigel Walkden) [4668]

MM23

9565

Support

Summary of representations:

ECC as highway and transportation authority is satisfied that the ambition of offering a choice of travel modes and reducing the dependency on car use can be addressed through Policies BE13 and BE17.

Summary of representation changes to plan:

None required

Response:

Support welcomed

Action:

No action required

29486

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM24

9564

Support

Summary of representations:

Support. The inclusion of the additional wording to criterion B.b. ensures it is clear to applicants and decision makers the distinction between new and existing development and terminology to correctly refer to passenger transport. This modification addresses ECC's previous reps. Street lighting is important and police presence too. People need to feel safe if you are expanding dwellings as it will change environment and become more urban.

Summary of representation changes to plan:

None required

Response:

Support welcomed

Action:

No action required

29487

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

29716

Support

Respondent: Gita Mackintosh [7214]

MM25

9741

Object

Summary of representations:

Not Effective

The inclusion of the additional wording after paragraph 5.119 in relation to passenger transport having consideration of the ECC's Development Management Policies is welcomed. This addresses ECC's Reg.19 Rep 22378 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

A further addition needs to be made to the paragraph in order to reflect Government policy on passenger transport and buses and where ECC's position on this is detailed.

Summary of representation changes to plan:

Insert additional wording 'and Essex County Council Bus Service Improvement Plan' after 'Management Policies' in the proposed new paragraph. Change 'or successor' to 'or their successors' in the proposed new paragraph.

Response:

Agree, amend paragraph 5.119 as suggested to make effective

Action:

Amend paragraph 5.119 accordingly.

29625

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM26

9739

Object

Summary of representations:

Not Consistent with National Policy

As currently worded the policy is not considered to be consistent with paragraph 112 of the NPPF.

This reflects ECC's Reg.19 Rep 22380.

Summary of representation changes to plan:

Replace the proposed wording for Policy BE15 - Electric and Low Emission Vehicles with the following wording: All development proposals should provide space for, and/or safe and convenient access to, vehicle charging infrastructure.

Response:

Disagree. Paragraph 112 of the NPPF focusses on development applications. The currently worded policy is considered to be consistent with this paragraph. The previously agreed wording with ECC (proposed in F9A) was discussed in relevant hearing sessions, necessitating further modifications as proposed by MM26 to make the policy sound.

Action:

No action required.

29626

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM27

9736

Object

Summary of representations:

Not Consistent with National Policy

The wording in criterion A needs to be amended to ensure that the policy is positively prepared, and is consistent with paragraph 110 of the NPPF, particularly 101 d.

This reflects ECC's Reg.19 Rep 22386 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

Summary of representation changes to plan:

Replace the proposed wording for criterion A of Policy BE16 Mitigating the Transport Impacts of Development with the following wording: 'Developments must seek to ensure that any significant impact from the development on the transport network (in terms of capacity and congestion) or on highway safety, can be cost effectively mitigated to an acceptable degree.

Response:

Disagree. The currently worded is consistent with paragraph 110d of the paragraph of which end goal is to ensure that development would not have an unacceptable impact on the transport network. Paragraph 110 applies when assessing allocation sites or development application, and would therefore be considered as part of the planning application process, against proposed mitigation measures to make development acceptable. However, if the Inspectors are minded to make a modification to essentially restate the NPPF the following is proposed: "Developments must not have an unacceptable impact on the transport network in terms of highway safety, or severe residual impacts on the highway network that cannot be cost effectively mitigated to an acceptable degree."

Action:

No action required.

29627

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9737**Object****Summary of representations:**

Not Justified

Not Effective

There are some junctions where traffic flows appear to have been underestimated in the Transport Assessment and therefore the impacts of Local Plan growth may also be understated. This includes the junctions along Brook Street between the M25 and Brentwood Town Centre. More robust analysis will therefore be required through the planning application process for relevant sites, which in turn could necessitate additional infrastructure improvements.

Paragraph 5.128 needs to be amended to provide this flexibility.

This reaffirms ECC's position as set out in its Hearing Statement F76A.

Summary of representation changes to plan:

Replace the proposed wording for paragraph 5.128 with the following wording: 'Joint working has been undertaken with National Highways, Essex County Council (highways authority), developers and all relevant partners to assist in the identification of necessary mitigations at key junctions, to address the cumulative impact of growth within the borough over the Plan period. In addition to strategic transport infrastructure, a number of highways junction improvements will need to be made to facilitate new growth, including those identified in the Infrastructure Delivery Plan.'

Response:

Disagree, the recommended changes are not necessary for soundness. The IDP is a live document and would be kept under review to capture required mitigations that have not been identified at this point in time. Policies in the Plan require development proposals to be supported by robust transport evidence, which would be considered through the planning application process.

Action:

No action required.

29628**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9738**Object****Summary of representations:**

Not Justified

Not Effective

ECC as highway and transportation authority notes that a comprehensive and deliverable package of sustainable transportation interventions is required to reduce Local Plan impacts and a number of options are set out in the Transport Assessment (2021). Further consideration of the most effective measures can be achieved as part of a sustainable transport strategy, developed in consultation with ECC as Highway Authority for BBC and other relevant statutory consultees and stakeholders.

Paragraph 5.131 needs to be amended to reflect this position.

This reaffirms ECC position as set out its Hearing Statement F76A.

Summary of representation changes to plan:

Delete all wording after 'implemented in Brentwood Borough' in paragraph 5.131 and replace with the following: 'as part of a sustainable transport strategy for Brentwood borough.'

Response:

Disagree, suggested amendments are not considered necessary to make policy sound. Although some elements of the work undertaken to prepare the emerging Sustainable Transport Strategy have been included in the Transport Assessment and the IDP, the Strategy has not been finalised and published as part of the Local Plan evidence base and is subject to further work.

Action:

No action required.

29629**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9740**Object****Summary of representations:**

The developments R25 and R26 will cause significant traffic increase on small rural roads in the vicinity of these sites, notably Red Rose Lane, which is already classified as being unsuitable for large/heavy vehicles. This road is used frequently by pedestrians and dog-walkers, it's narrow and has no pavement. Adding 70 houses to this road will make for a huge increase in traffic which is completely incompatible with the road in it's present state. To widen it to make it safe, will cost a substantial amount and be to the detriment of the historic nature of the lane and village.

Summary of representation changes to plan:

Remove sites R25 and R26 from the plan, and replace them with sites where there is already appropriate road infrastructure in place, notably along the A12 and Brentwood areas. Alternatively, erect a manageable number of new houses that will mitigate any impact on local roads and services.

Response:

The Council has consulted Essex County Council as the Local Highways Authority on highways safety and capacity issues. The Council considers that site allocations R25 and R26 align with its Strategic Objectives. Detailed considerations will be assessed and addressed at the planning application stage, informed by site specific detailed evidence.

Action:

No action required.

29490**Object**

Respondent: Mr Richard Thwaite [6964]

29859**Object**

Respondent: Mrs Edna Williams [4728]**MM28****9714****Object**

Summary of representations:

Not Effective

ECC as highway and transportation authority welcomes the modification to criteria A and C of the policy, as well as the deletion of original criterion B. The modifications provide clarity in relation to the current position in respect of parking policy.

A further amendment is sought to criterion A to ensure the policy is effectively worded. This would be consistent with recently adopted policy on parking in the Chelmsford City Council Local Plan.

This reflects ECC's Reg.19 Rep 22387, position in Statement of Common Ground (F17D) between BBC and ECC, and reaffirms ECC's position as expressed at EIP.

Summary of representation changes to plan:

Replace the proposed wording for criterion A of Policy BE17 - Parking Standards with the following wording: The Council will have regard to the Essex Parking Standards – Design and Good Practice (2009), or as subsequently amended, when determining planning applications.

Response:

Disagree. Not necessary for soundness. The wording previously agreed with ECC was discussed at the hearing session which necessitates the proposed MM28.

Action:

No action required.

29630**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9728**Object****Summary of representations:**

You cannot extend parking in areas that already are lacking suitable parking for residents - any new developments must ensure that it provided dedicated permits specific to that development.

Summary of representation changes to plan:

Provide parking permits for specific developments only and not expand into existing surrounding permit areas as this will significantly impact existing residents when average 1.6 cars per new home regardless electric, diesel or petrol.

Response:

Disagree, not considered appropriate or necessary to make change to policy. The Council adopted the Essex Parking Standards – Design and Good Practice (2009) as a Supplementary Planning Document (SPD) in 2011 and will expect these standards to apply until such time as they are revoked or superseded by other standards.

Action:

No action required.

29718**Object**

Respondent: Ms Barbara Connelly [9104]

MM29**9574****Support****Summary of representations:**

The proposed modifications to the Green and Blue Infrastructure policy are considered in principle to be consistent with paragraphs 20, 92, 54 and 175 of the NPPF.

Summary of representation changes to plan:

NA

Response:

Noted

Action:

None required

29717**Support**

Respondent: Gita Mackintosh [7214]

29488**Support**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9692

Object

Summary of representations:

New paragraph 5.145 states that "designated Urban Open Spaces....provide an important multi-functional local resource to residents and therefore, are to be protected." The Local Plan Proposals Map is largely unchanged in respect of such designations, however, the 2017 Brentwood Open Space Strategy assessed the value of all sites. Site ID19b was ranked at the lowest level (1 out of 5) for public accessibility and Recreational Value, and 2 for amenity value. This low value rating conflicts with the above statement and questions the worthiness of their protection.

Summary of representation changes to plan:

The continued designation of Urban Open Spaces (UOS) has not reflected either up to date or robust assessment and such designations appear as a broad brush approach to all open space. The Plan should reflect that such spaces CAN provide an important local resource, rather than the statement that they all do, and paragraph 5.145 should be amended to reflect this position. This would provide a clearer starting point, where proposals will see the loss or change to an UOS, for assessment to determine the level of contribution they make in each case.

Response:

Disagree, Open spaces play an important role across the borough, including urban open spaces as reflected in para 5.145 and Figure 5.3. There is no evidence which supports that the open space at this location is more important than other types of green infrastructure.

Action:

No action required.

29736

Object

Respondent: The Ursuline Sisters Brentwood CIO [9107]

Agent: JTS Partnership LLP (Mr. James Govier) [2587]

9697

Object

Summary of representations:

Generally, the policy has been streamlined and the wording around GBI provision, enhancements management and maintenance has been more closely aligned to para 174 of the NPPF. The new policy broadly appears to give appropriate protection to existing GBI and makes adequate policy provision for extending and securing delivery of new GBI and its management, in line with the NPPF. Further refinement to supporting text is needed, see suggestion.

Summary of representation changes to plan:

At 5.157 A reference should be made to the new Strategic Policy NE01: Protecting and Enhancing the Natural Environment, which incorporates Essex RAMS and Epping Forest SAC ZOI and references the Essex RAMS Supplementary Planning Document, as this is linked to protection of existing Green Blue Infrastructure (GBI) and provision of new GBI as Suitable Alternative Natural Greenspace (SANGs.)

Response:

Disagree - Paragraph 5.157 already cross references Policy NE01, modification not necessary to make sound.

Action:

No action required.

29847

Object

Respondent: Natural England [216]**Agent:** Natural England (Ms Anna Oliveri) [9119]

9718

Object

Summary of representations:

Section C states developments adjacent to a water course are read to ensure there is no adverse impact on water quality of blue infrastructure. The sites R25 and R26 will cause further overload on the sewerage infrastructure which is already inadequate and causes effluence to overflow into the river wid. So on that basis it is unacceptable to build more houses which will result in further water quality issues as well as flooding which results in adverse impacts on the functioning and water quality of the blue infrastructure.

Summary of representation changes to plan:

Remove sites R25 and R26 from the plan and replace them with sites where there is no adverse impact on the blue infrastructure.

Response:

Disagree, when developers submit relevant planning applications for development on site R25 and R26, detailed considerations including but not limited to waste water and sewage infrastructure capacity, and flood mitigations will be assessed in accordance with policies in the Local Plan and addressed at the planning application stage, informed by site specific detailed evidence.

Action:

No action required.

29491

Object

Respondent: Mr Richard Thwaite [6964]

9743

Object

Summary of representations:

The revised definition of garden land is imprecise.

Without more careful referencing to the Essex Design Guide for communal gardens and plot drawings, and the deletion of "etc" the definitions are too loose and fail to provide the necessary clarity of guidance for landscape-led design approach.

Summary of representation changes to plan:

Definition of Garden Land and Other GI – Delete: Garden Land Private back gardens, private amenity green space on estates or private communal gardens that are entirely to the rear or within the curtilage of a dwelling or dwellings, as originally designed Other GI green walls, green roofs, estate greenspace, etc Substitute with: Garden Land: land within the residential curtilage of dwellings, Communal Gardens, and amenity green spaces in residential developments laid out in accordance with planning permissions and conditions Other GI: Green Walls and Green Roofs as set out in the Essex Design Guide

Response:

Disagree. The suggested changes are not considered necessary for soundness. The provided definitions are considered sound for their purpose

Action:

None required

29884

Object

Respondent: Philip Cunliffe-Jones [1406]

MM33

9573

Support

Summary of representations:

The modified policy is supported as it would be considered to accord with Government policy in paragraph 99 of the NPPF (2021). A minor drafting error has been identified in modified paragraph C of the policy.

Summary of representation changes to plan:

NA

Response:

Support welcomed

Action:

No action required

29456

Support

Respondent: Sport England (Mr. Roy Warren, Planning Manager) [4294]

9680

Object

Summary of representations:

Criteria A(a) of Policy NE05 provides the exception to the presumption against development of open spaces, where assessment can demonstrate the function it performs is "surplus to requirements". Such wording is vague and unhelpful and will be extremely subjective. New paragraph 5.145 (see MM29) states that the presumption against will exist for open spaces which "provide a significant amenity resource". This is the much clearer test that should be applied and better reflects the multi-functional qualities of open space which are not always best assessed against a test of being surplus to requirements.

Summary of representation changes to plan:

The wording of Policy NE05 (A)(a) should be amended to read: a. an assessment has been undertaken which clearly shows the provision and the function it performs is NOT OF SIGNIFICANT RECREATIONAL OR AMENITY VALUE; or

Response:

Disagree, the Council's evidence base has illustrated a need for a play pitch at this location (PPS 2018). Sport England has recognised that the inclusion of a playing pitch at this location may have a negative impact on site capacity and viability and therefore have agreed to a financial contribution to be made. Based on the Council evidence base the site does have recreational and amenity value.

Action:

No action required.

29739

Object

Respondent: The Ursuline Sisters Brentwood CIO [9107]

Agent: JTS Partnership LLP (Mr. James Govier) [2587]

9682

Object

Summary of representations:

Open space and green areas at the centre of the villages and communities making up Brentwood should be preserved for future generations.

Summary of representation changes to plan:

None.

Response:

Noted. Policy NE05: Open Space and Recreational Facilities, seeks to ensure all open spaces, as identified will be protected and where necessary enhanced.

Action:

No action required.

29680

Object

Respondent: Mr John Darragh [4862]

9742**Object****Summary of representations:**

Neither NE95 or NE02 provide for protection of access rights for the classes of users entitled to enjoy the network and spaces within it which is an existing priority and will become more important.... r> It would be a patent absurdity to have strategic policies in the Local Plan, which forms a key part of the Council's Policy Framework, that open spaces will be protected, and where necessary enhanced, and that all GBI spaces will be well managed when the legal rights held by the Council as landowner for an easement and enforcement of building scheme covenants over the unadopted part of Glanthams Road which would enable essential access and management of its woodland open space are so neglected as to frustrate the Council's own policy, and potentially consign the access to over 9 acres of open space to unlawful encroachments. The Plan should make clear provision to protect and enhance access for suitable classes of users to such spaces.

Summary of representation changes to plan:

Amend the first sentence in Paragraph A in NE05 as follows: All open spaces, including the designated Urban Open Spaces and the Woodland Open Space rear of Brentwood Community Hospital, will be protected and where necessary enhanced with the Rights of Way network also enhanced if necessary to ensure access for all users to high quality provision and opportunities for sport, play, recreation and exercise within the borough.

Response:

Disagree, the suggested changes are not considered necessary for soundness. As currently worded and modified, NE05 and NE02 are considered appropriate as overarching policies regarding GBI, open space and recreational facilities. Detailed considerations are to be assessed and addressed at the planning application stage, informed by site specific detailed evidence.

Action:

None required.

29886**Object****Respondent:** Philip Cunliffe-Jones [1406]

MM34

9569

Support

Summary of representations:

The deletion of policy BE23 and replacement with NE05 is supported as it would be considered to accord with Government policy in paragraph 99 of the NPPF (2021).

Summary of representation changes to plan:

A minor drafting error has been identified in the new paragraph that precedes paragraph 5.185 and paragraph 5.185 itself which should be addressed before the plan is adopted.

Response:

Noted. Drafting error, which comprised a minor typo, to be changed prior to adoption.

Action:

Correct minor typo.

29457

Support

Respondent: Sport England (Mr. Roy Warren, Planning Manager) [4294]

MM35

9572

Object

Summary of representations:

Objects to the revision of policy HP01 part C that would seek to reduce the threshold from 500 units to 100 or more dwellings where part a. and b. would apply. These modifications proposed will have significant impacts on scheme viability and deliverability on schemes of a 100 units or more, which does not have the same critical mass as a larger strategic scale 500 + unit schemes, to accommodate diversified housing types and models.

Summary of representation changes to plan:

Objects to the revision of policy HP01 part C that would seek to reduce the threshold from 500 units to 100 or more dwellings where part a. and b. would apply.

Response:

Disagree, the change in the threshold for self and custom build is based on the Council's self and custom build register to determine the need. The Council's viability assessment has tested this, and no viability constraints have been identified.

Action:

No action required.

29880

Object

Respondent: Stonebond Properties Ltd [5948]

Agent: Phase 2 Planning and Development Ltd (Mr. Michael Calder, Associate) [3814]

9579**Object****Summary of representations:**

CEG is committed to the delivery of self and custom build housing at Dunton Hills Garden Village. Planning for a variety of housing types, including self and custom build assists in the delivery of housing on large sites. However, the minimum target of 5% is not justified by the current evidence base and this position has not changed since the Regulation 19 consultation during which CEG made similar objections to Policy HP01.

The wording of the policy does now account for this; linking self-build delivery to evidence of need. However, further amendments should be made.

Summary of representation changes to plan:

Amend Policy HP01 part C.a. to read: "Maximum of 5% self-build homes which can include custom housebuilding provided there is a need as justified within the Council's most up to date evidence" (replace 'minimum' with 'maximum').
Amendment for clarity and certainty to ensure the proper planning of Dunton Hills Garden Village.

Response:

Disagree, the Self and Custom build requirements have been evidenced through the Council's Self and Custom Build register and discussed through the hearing sessions. No changes required as policy considered sound as originally drafted.

Action:

No action required.

30065**Object**

Respondent: CEG Land Promotions Limited [5050]

Agent: Lichfields (Ms Rachel Clements, Associate Director) [9145]

MM37

9583

Object

Summary of representations:

Request insertion of policy H15 from 2005 Replacement Local Plan or similarly worded policy which recognises the special character (low density) of the Hutton Mount estate. There is no justification for the exclusion of similar policies and guidance within the emerging Local Plan, nor is its exclusion justified with reference to the history of Hutton Mount or the guidance contained within the NPPF.

Summary of representation changes to plan:

Request insertion of policy H15 from 2005 Replacement Local Plan or similarly worded policy which recognises the special character (low density) of the Hutton Mount estate.

Response:

Disagree, Policy HP03 is considered appropriate to cover this matter. There is no specific evidence that identifies a requirement for a separate policy or criteria in the Hutton Mount area.

Action:

No action required.

29866

Object

Respondent: Hutton Mount Limited [103]**Agent:** MP Architects LLP (Mr Martyn Pattie, Partner) [9121]

MM38**9600****Object****Summary of representations:****Not Effective**

ECC has statutory responsibilities for Adult Social Care. An amendment is sought to the supporting text in the proposed new paragraph after 6.25 to reflect the most up to date position and to ensure the text is effective.

Summary of representation changes to plan:

Replace proposed new paragraph after 6.25 with the following: New residential developments provide an opportunity to deliver specialist accommodation where local needs are identified. Specialist accommodation includes housing for people living with disabilities, sometimes referred to as supported living. Supported living accommodation can require facilities for live-in (i.e. on-site) care provision depending on the nature of support requirements.

Residential developments can also help deliver extra care accommodation in suitable locations. Extra care, also known as Independent Living, provides specialist housing for people primarily over the age of 55 with varying care and support needs who wish to reside in their own home. Extra Care housing is recognised as a preferred alternative to residential care, or for those faced with remaining at home in unsuitable accommodation, where appropriate to individual circumstances.

Response:

Part agree, amend new paragraph after 6.25 to read as suggested concerning text on supported living. However, disagree to the inclusion of suggested text concerning extra care. Not necessary as this would be duplication of preceding paragraph 6.25 which already covers this point.

Action:

Amend new paragraph after 6.25 to read as suggested concerning text on supported living.

29572**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM39

9607**Object****Summary of representations:**

Supports replacing SHMA reference with "housing evidence". However, the policy needs to be more flexible for larger strategic sites which have specific challenges associated with delivering homes across multiple phases over the plan period. The current wording applies the tenure split too rigidly. For these developments, the policy needs to consider when infrastructure is delivered, viability, and the overall tenure split for the site as each plot comes forward. DHGV will be delivered up-to and post 2033. Hence there is a need to consider and account for potential for changes to the housing needs over such a long period.

Summary of representation changes to plan:

For Dunton hills Garden Village – to be delivered over a prolonged time period – the approach to affordable housing mix and tenure will need to be flexibly considered on a phased basis to ensure that housing delivered takes into account the viability of the proposal. The below wording will ensure the policy is effective for larger strategic sites; making the policy more effective. Amend HP05 a & c as follow: a) the tenure split be made up of 86% Affordable/Social Rent and 14% as other forms of affordable housing (this includes starter homes, intermediate homes and shared ownership and all other forms of affordable housing as described by national guidance or legislation) or regard to the most up to date housing evidence. For larger strategic sites (including Dunton Hills Garden Village), the approach to affordable housing tenure split on a plot by plot basis will be flexible considering phased delivery of infrastructure to ensure viable proposals come forward over the life of the Plan; c) The type, mix, size and cost of affordable homes will have regard to the identified housing need as reported by the Council's most up-to-date housing evidence.

Response:

Disagree, not expected that there should be a different approach for DHGV. The appropriate level of affordable housing provision is applied equally across all proposals as they come forward.

Action:

No action required.

30066**Object****Respondent:** CEG Land Promotions Limited [5050]**Agent:** Lichfields (Ms Rachel Clements, Associate Director) [9145]

9610**Object****Summary of representations:**

The first criterion in revised Policy HP05-Paragraph D introduced by MM39 is too absolute. It is always possible for dwellings to be acquired by a Registered Social Provider, including the Council, but it may not be practicable for providers to manage especially in the case of a small number and the financial negotiations can also lead to an impasse.

Summary of representation changes to plan:

Affordable Housing MM39 HP05 Amend Paragraph D as follows: The Council will only accept off-site provision, or a financial contribution which will secure at least the equivalent amount of accommodation and also acceptable to a Registered Provider, in lieu of on-site provision where it can be robustly demonstrated that on-site provision is not reasonably possible and that, in the individual case and to the satisfaction of the Council, the objective of creating mixed and balanced communities can be effectively and equally met through either offsite provision or a financial contribution.

Response:

Disagree, not considered appropriate or necessary to make change to policy. Policy is effective as written.

Action:

No action required.

29895**Object**

Respondent: Philip Cunliffe-Jones [1406]

MM40**9611****Support****Summary of representations:**

The proposed modification to paragraph 6.50 provides the factual representation of the Essex Design Guide. This modification addresses ECC's Reg.19 Rep 22393 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

Summary of representation changes to plan:

This modification addresses ECC's Reg.19 Rep 22393 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

Response:

Noted.

Action:

No action required.

29501**Support**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM41

9651

Object

Summary of representations:

It is outrageous and breaking the law to make the land at Oaktree Farm that has been declared illegally converted from agricultural land into residential land now be made an official pitch for travellers. If this goes ahead, you will be telling travellers all over the country that it is OK to break the law, as it is easier to give in to brute force and illegal actions than it is to uphold the law.

Summary of representation changes to plan:

The pitches at Oaktree farm should be removed from the plan as they have been illegally settled on (as declared by a high court judgement)

Response:

The Council has an obligation to ensure it provides enough gypsy and traveller pitches to meet our needs as determined by the GTAA. As discussed during the Local Plan hearing sessions, there were no sites put forward for gypsy and traveller pitches which left the Council with limited options for ensuring the boroughs needs were met. The Council undertook site assessment work to ensure that those sites allocated were appropriate.

Action:

No action required.

29492

Object

Respondent: Mr Richard Thwaite [6964]

MM43

9659

Object

Summary of representations:

The illegally obtained traveller site at Oaktree Farm currently comprises of at least 20 caravans. To allow 7 pitches is a travesty of justice (the high court has already declared this site as being illegal), but if you allow sub-division of pitches, then you will rapidly end up with the current 20 or more pitches instead of the allocated 7. It is an extremely short-sighted, naive and dangerous modification to allow sub-divisions of pitches and to remove the maximum of 10 pitches on a site.

Summary of representation changes to plan:

Reinstate the rule that there can be no more than a maximum of 10 pitches on a site, and that sub-divisions of pitches are not allowed.

Response:

The requirements for subdividing existing pitches was discussed during the Local Plan examination hearing sessions. The decision to remove the 10 pitch limit was required as it was not deemed compliant with national planning policy and guidance. Pitches are not permitted to sub-divide outside the site boundary and must meet the caravan licensing space requirements.

Action:

No action required.

29493

Object

Respondent: Mr Richard Thwaite [6964]

MM46

9653

Object

Summary of representations:

Not Consistent with National Policy

The reference to 'disabled and impaired' in criterion c. should be replaced with 'people with disabilities' to be consistent with the definition in the NPPF.

Summary of representation changes to plan:

In criterion c. of Policy HP12 replace the wording 'the disabled or impaired' with 'people with disabilities'

Response:

Agree, amend criterion c of Policy H12 as suggested to make consistent with National Policy.

Action:

Amend criterion c of Policy H12 as suggested.

29573

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM51

9656

Support

Summary of representations:

Consistent with National Policy

The inclusion of the additional wording in paragraph 6.125 ensures the full range of non-designated heritage assets are identified and considered.

This modification addresses ECC's Reg.19 Rep 22398 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

Summary of representation changes to plan:

None.

Response:

Noted.

Action:

No action required.

29502

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9660**Support****Summary of representations:**

Agree due diligence should be taken re heritage sites. Once our environment is altered it will be gone for good and we need to retain heritage as this is what is so attractive to Brentwood and for those who live here.

Summary of representation changes to plan:

None.

Response:

Noted.

Action:

No action required.

29719**Support**

Respondent: Gita Mackintosh [7214]

9663**Object****Summary of representations:**

The proposed wording in relation to non-designated heritage assets is not consistent with Paragraph 203 of the NPPF. Currently, the wording directly weighs harm/loss versus public benefit which goes beyond the policy test for non-designated heritage assets and has not been justified.

Summary of representation changes to plan:

Amend 3.i,ii,iii to read: i. the significance of the asset and its setting; and ii. the scale of harm or loss has been minimized.
Delete 3.iii

Response:

Disagree, the wording as proposed is considered to be in conformity with the Framework.

Action:

No action required.

30055**Object**

Respondent: CEG Land Promotions Limited [5050]

Agent: Lichfields (Ms Rachel Clements, Associate Director) [9145]

9666**Object**

Summary of representations:

If 'great weight will given to the preservation of a designated heritage asset and its setting' then how can building on sites R25 and R26 be allowed, as they will further increase the flood risk to the grade I listed church in the conservation area that is less than 500 m away from those sites.

Summary of representation changes to plan:

Remove sites R25 and R26 from the plan and replace them with sites where there will no risk of damage to a heritage asset.

Response:

When developers submit relevant planning applications for development on site R25 and R26, detailed considerations including but not limited to design, responding to the local characters, potential impact on heritage assets and/or their setting and flood mitigations will be assessed and addressed at the planning application stage, informed by site specific detailed evidence.

Action:

No action required.

29494**Object**

Respondent: Mr Richard Thwaite [6964]

9673**Object**

Summary of representations:

Non designated Heritage Assets..can include lanes.. a strong requirement for their retention. Redrose Lane has a history of being used during the plague of the 1300's and is of historic significance will be completely changed with the development of R25 and R26.

Summary of representation changes to plan:

Reduce the size of the development and hence the impact on Redrose Lane.

Response:

When developers submit relevant planning applications for development on site R25 and R26, detailed considerations including but not limited to design, responding to the local characters, potential impact on locally listed heritage assets and/or their setting will be assessed and addressed at the planning application stage, informed by site specific detailed evidence.

Action:

No action required.

29860**Object**

Respondent: Mrs Edna Williams [4728]

MM57**9567****Object****Summary of representations:**

The Local Plan can play a key role in supporting and facilitating local job creation and increasing local skills levels. The Local Plan is currently silent on this matter. ECC would welcome the Borough's support to include such provisions in the Local Plan, in order to assist in ensuring that such matters are a consideration within the planning process.

Additional wording should be added to the 'new jobs' retaining supporting text after paragraph 7.16.

This reflects ECC's Reg.19 Rep 22403 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

Summary of representation changes to plan:

Changes to plan: Include the following paragraphs after paragraph 7.16 – Facilitating the training and education of local people enables them to gain skills required to enter or remain part of the local workforce; and establishing and maintaining relationships between local businesses and local training and education providers ensures local facilities are provided to access professional and vocational training. Larger scale developments in the Borough can support employment opportunities and increased skills levels by embedding both development and end-use phase obligations in the planning process. This would include requirements for the development of apprenticeship opportunities, educational outreach and social value. Monetary contributions to support interventions will increase skills levels and/or employability skills supporting those hard to reach and furthest away from the job market.

This reflects ECC's Reg.19 Rep 22403 and the position in the Statement of Common Ground (F17D) between BBC and ECC

Response:

Disagree, the proposed changes are not necessary to make the policy sound. The previously agreed modifications to paragraph 7.16 were proposed in document F9A. They were reviewed and discussed at the hearing session which necessitated their removal.

Action:

No action required

29574**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9571**Object**

Summary of representations:

Paragraph 7.20 should be amended to provide clarity as to the difference in figures in Table 7.5 (33.76ha to 45.96ha) and the figure in paragraph 7.20 (46.64ha). This would ensure consistency.

Summary of representation changes to plan:

Changes to plan: Provide clarity in paragraph 7.20 on the difference between employment land figures in Table 7.5 and paragraph 7.20. This Policy criterion has been substantially rewritten since the Reg.19 Pre-Submission consultation.

Response:

Disagree, the figures in table 7.5 refers to employment land requirements whilst paragraph 7.20 refers to the total employment land allocation area. This was discussed in detail at the hearing session which led to proposed modifications in MM57

Action:

No action required

29542**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9576**Object**

Summary of representations:

To avoid confusion, the Use Classes in Table 7.4 should be amended to reflect the up to date Use Class Order.

Summary of representation changes to plan:

Changes to plan: Amend Table 7.4 as follows: • Offices: E1g(i) and E1g(ii) • Manufacturing: E1g(iii) and B2. The current Use Classes Order was not available at the time of the Reg.19 Pre-Submission consultation

Response:

Agreed, amend Table 7.4 as suggested to make effective

Action:

Amend Table 7.4 as outlined above.

29575**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM58

9580

Support

Summary of representations:

The deletion of the word 'normally' from paragraph 7.22 b. removes ambiguity (as there is no definition of what constitutes 'normal' in this context) and removes opportunities for applicants to justify that their application represents a departure and that a full 24-month active marketing is not required to justify the lack of viability of the site for employment use. The proposed deletion is in line with paragraph 16 d) of the NPPF

Summary of representation changes to plan:

N/A

Response:

Support Welcomed

Action:

No action required

29503

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9582**Object****Summary of representations:**

Additional supporting text needs to be provided that clarifies what is considered 'reliable evidence' as required in criterion A.b.

Summary of representation changes to plan:

Provide additional supporting text to set out what reliable evidence should consist of, as follows:

- Be independent - funded by the scheme promoter but specified, appointed and managed by the local authority
- Justify why the study area is the relevant property market area for each land use
- Recognise the point in the economic and property market cycle, recognising potential upsides and downsides in the short, medium and longer term
- Consider spatial, market and socioeconomic drivers of demand – including sector mix and business demography
- Consider how planned economic development initiatives, infrastructure and regeneration projects may affect demand
- Consider the needs of start-ups and businesses that have outgrown their initial accommodation, rather than focus solely on larger premises
- Consider mix of unit sizes, specification, configuration and affordability, based on local market knowledge – recognising that demand is sensitive to prices
- Recognise that, in the case of retail and leisure uses, meanwhile / temporary uses can help to stimulate demand
- Recognise that historic take-up rates are often limited by inadequate supply (quality, quantum and affordability) and consider alternative evidence of demand such as known occupier requirements, enquiries received, waiting lists for multi-let space
- Consider vacancy and availability of space, recognising that lease terms and affordability can limit suitability of available space for occupiers
- Consider the development pipeline locally, recognising that planning permissions do not always turn into delivered floorspace
- Where relevant, consider the viability of employment floorspace alongside residential uses
- Outline marketing activity to date, recognising that interest will be stronger as the scheme becomes more developed, time moves nearer to completion of the floorspace / post-completion, and the location becomes more established
- Set out feedback from market engagement, and the options considered to improve deliverability (e.g. revising specification of spaces / mix of uses, early delivery of a critical mass of floorspace, design to mitigate impacts on neighbours)
- Make clear what support has been sought from the public sector to address identified market failures

Response:

Partly agree. amend text to include reliable, objective and independently assessed.

Action:

Add the additional text 'reliable, objective and independently assessed'.

29543**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9587**Object****Summary of representations:**

ECC objects to the removal of the word "significant". Criterion A.a. should be strengthened to ensure that there is efficient use of employment land, and to avoid the provision of a "token" amount of employment land to allow release of large amounts of employment land. less

Summary of representation changes to plan:

Replace word 'significant' in criterion A.a. with the word 'predominantly'

Response:

Part agree, reinstate word 'significant'

Action:

reinstate word 'significant'

29631**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM62**9606****Object****Summary of representations:**

There is great concern over having retail space at wages way. Access is only ongar road and it is already gird locked and not solvable purely bu transport or walking.

William Hunter car park. Why take this away for people who want to access the town. Definition as to what retail space will be offered here and how sustainable it will be given the shift in consumer to online shopping questions what retail space would be required. Unless it's entertainment space.

Summary of representation changes to plan:

Changes to plan: Please be clear with how you anticipate the retail space to be of use and it's viability given covid has changed how we engage and access retail

Response:

The highway authority has not raised concerns regarding the access to the retail space. The impacts of COVID are not yet known. According to the Council's evidence base there is a need for the proposed retail space. This will be market driven.

Action:

No actions required.

29722**Object**

Respondent: Gita Mackintosh [7214]

MM63

9609

Object

Summary of representations:

The small rural village of Blackmore has been incorrectly classified as a Category 3 settlement; the facts support a Category 4 classification, so development of these sites should not be permitted.

Summary of representation changes to plan:

None

Response:

The Council has produced evidence to support the settlement hierarchy and this was discussed during the local plan examination hearing sessions. Therefore the justification of Blackmore as a Category 3 settlement is justified and supported by evidence.

Action:

No changes required.

29790

Object

Respondent: Mr Anthony Cross [4376]

9613

Object

Summary of representations:

The policy (PC04, formerly PC08) is sound and CEG supports its aims. The addition of a reference to the two neighbourhood hubs – to be defined ‘local centres’ – at Dunton Hills Garden Village is supported as are the amendments to footnote 10. However, the wording of the policy should be amended to make it clearer. less

Summary of representation changes to plan:

Amend PC04 (formerly PC08) as follow: A. The Council will promote the roles and functions of the existing and future Designated Centres to positively contribute towards their viability, vitality, character and structure. The following Designated centres and their associated Primary Shopping Area, as are detailed in Figure 7.7 and shown on the Brentwood Policies Map, are designated for retail, leisure and other main town centre uses.” This amendment will ensure the policy better reflects the fact that the centres proposed at Dunton Hills have not yet been delivered. One typo is also corrected

Response:

Disagree, as the new centres are already identified as forthcoming in relevant policies. At this point in time, the new designated centres are ‘future’ but once built they will be part of the existing designated centres hierarchy. Therefore, the suggested change is unnecessary

Action:

No action required

30067

Object

Respondent: CEG Land Promotions Limited [5050]

Agent: Lichfields (Ms Rachel Clements, Associate Director) [9145]

MM64

9614

Support

Summary of representations:

The inclusion of the additional wording to criterion E.b. ensures that linkages to Brentwood station should include all modes of sustainable transport including passenger transport. This modification addresses ECC's Reg.19 Rep 22410 and the position in the Statement of Common Ground (F17D) between BBC and ECC

Summary of representation changes to plan:

N/A

Response:

Support welcomed

Action:

No action required.

29504

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9615

Support

Summary of representations:

It's crucial shop fronts retain village feel.

Summary of representation changes to plan:

N/A

Response:

Support welcomed.

Action:

No action required

29723

Support

Respondent: Gita Mackintosh [7214]

MM67

9616

Object

Summary of representations:

Caplets lack of clarity how noise, crime and social issues will be managed - currently zero management of parking, social issues, noise and crime - we as residents deserve assurances with those improvements supposedly to improve the overall benefits to Brentwood benefits residents less

Summary of representation changes to plan:

Must ensure 24 hour policing, no more pubs/ late bars and more importantly extended service to reduce noise and parking@ social issues - on paper your plans sound like a dream! Try living in the town centre - it's a nightmare and majority residents avoid the town centre because of this

Response:

The Local Plan is not able to provide policy requirements for policing schedules. Parking restrictions are identified by the highway authority.

Action:

No action required

29721

Object

Respondent: Ms Barbara Connelly [9104]

MM69

9619

Support

Summary of representations:

The proposed modifications to paragraph 7.83 and 7.90 of the reasoned justification to Policy PC14 are supported as they specifically confirm that the applicant should account for the Council's Built Facilities Strategy when considering indoor sports and leisure facilities to support the content of the policy which seeks to protect existing facilities and support new facilities that would include indoor sports facilities.

Summary of representation changes to plan:

A minor drafting error in paragraph 7.83 has been identified which should be addressed before the plan is adopted

Response:

Support welcomed. Typo to be corrected before adoption.

Action:

Correct typo

29458

Support

Respondent: Sport England (Mr. Roy Warren, Planning Manager) [4294]

9621

Support

Summary of representations:

The deletion of the word 'education' from the definition of Community Facilities within paragraph 7.83 of the supporting text to Policy PC14 will avoid confusion between Policy PC14 and Policy PC15 and provide the necessary clarity to applicants and decision makers

Summary of representation changes to plan:

N/A

Response:

Support welcomed.

Action:

No action required

29505

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9789

Object

Summary of representations:

The scope of the amended strategic policy 10 for community facilities and services proposed by MM69 is flawed. The revised policy is stated, at present, to be read in conjunction with BE05, but MM16 provides that Policy BE05 and supporting text paragraphs 5.53 to 5.56 be deleted, so I assume that there is a formatting error and the reference should be to BE15. However, that cross reference provides little guidance regarding the loss or change of use of a community facility or service. The policy for community facilities and services proposed by MM69 needs to be revised.

Account should be taken of the impact of the COVID pandemic and national research.

It is of particular importance that the Local Plan guides decisions to ensure a proper application of the public sector equality duty. A revised strategic policy should give context to this legal duty in the application of the policy to protect Community Facilities.

Summary of representation changes to plan:

Paragraph A a and Ac delete "assets" and substitute "facilities" Paragraph Ae revise to read: Development proposals that would result in an adverse impact or unnecessary loss of community facilities will not be considered without a social impact report. Such reports shall take account of current guidance from the Equalities and Human Rights Commission. Proposals which would result in the loss of community facilities will not be permitted unless it can be demonstrated that:

- i. there are realistic proposals for re-provision that they will be replaced by alternative and well located facilities that will continue to serve similar and future needs of the neighbourhood and wider community;
- ii. the loss is part of a plan which requires investment in modern facilities or a community hub

Revise Paragraph 7.83 to read "Community facilities and services includes any registered Asset of Community Value and can encompass any services that assist current or future needs and support communities' health, social and cultural well-being"

Response:

The modified policy PC10 does not reference BE05 but BE15 as suggested in the comments. Discussion during the local plan hearing sessions resulted in the change of using 'assets' and changed the word to 'facilities'. Therefore the proposed change has already been made.

Action:

No action required.

29897

Object

Respondent: Philip Cunliffe-Jones [1406]

MM70

9625

Support

Summary of representations:

The proposed modifications to Policy PC14 (now PC10) directly respond to representations made by Sport England on the pre-submission version of the plan and the modification was subsequently agreed as part of the completed Statement of Common Ground with the Council although there have been a few minor amendments made to the modified policy since the SoCG was agreed. The modified policy is therefore supported as it would be considered to accord with Government policy in paragraph 99 of the NPPF (2021).

Summary of representation changes to plan:

N/A

Response:

Support welcomed.

Action:

No action required.

29459

Support

Respondent: Sport England (Mr. Roy Warren, Planning Manager) [4294]

9635

Object

Summary of representations:

section C states: 'Developments that generate a need for additional education facilities should make appropriate provision for their timely delivery as part of the development'. The sites R25 and R26 with 70 houses will undoubtedly have in the order of 20 children of primary school age. The current primary school in Blackmore is already oversubscribed with a waiting list. There is no room to extend the school, so the only way to make provision is to not build the houses in the first place. less

Summary of representation changes to plan:

Remove sites R25 and R26 from the plan and replace with sites that are in areas that have educational capacity, or the capacity to be extended to meet the needs

Response:

School capacity and places are identified by ECC who are the education authority. The education requirements for allocated sites R25 and R26 have been assessed, along with all other allocated sites in regards to education requirements.

Action:

No actions required.

29495

Object

Respondent: Mr Richard Thwaite [6964]

9638

Support

Summary of representations:

The inclusion of the additional wording 'childcare' to paragraphs 7.94 and 7.97 ensures that the full range of education provision is considered. These modifications address ECC's Reg.19 Repts 22412 and 22413, and the position in the Statement of Common Ground (F17D) between BBC and ECC.

Summary of representation changes to plan:

N/A

Response:

Support welcomed.

Action:

No action required.

29506

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9641

Object

Summary of representations:

The supporting text to Policy PC 15 needs to include reference to Post 16 education and skills to ensure the full range of education provision is considered. This reflects ECC's Reg.19 Rep 22414 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

Summary of representation changes to plan:

Insert additional paragraph after paragraph 7.102 to read as follows – All of the secondary schools within Brentwood have 6th form provision, learner's wishing to study vocational subjects either travel to South Essex College (Thurrock/Basildon), Chelmsford College with a further cohort traveling into Havering

Response:

Disagree, the suggested additional text is not considered necessary for soundness. The previously agreed wording was reviewed and discussed at the relevant hearing sessions which necessitates MM70

Action:

No action required

29576

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9645

Object

Summary of representations:

Additional paragraphs should be inserted at the end of this section relating to Special Education Needs (SEN) to ensure that the full range of education provision is identified and considered. This reflects ECC's Reg.19 Rep 22275 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

Summary of representation changes to plan:

Insert the following paragraph at the end of the Education and Schools section before paragraph 7.103 - In respect of Special Education Needs (SEN) children present with many different types of need and it is not possible to provide for every need within each District. Each special school is regarded as a regional centre of excellence for their type of need ie autism, severe learning difficulties etc and children attend from a wider geographical area. Some children in Brentwood with special needs travel to special schools in other areas of the County. Endeavour School is a special school for children aged 5 years to 16 years with moderate learning difficulties and complex needs and is the only special school in Brentwood. ECC commissions places for local children with an Education Health and Care Plan at this school. ECC has developed specially resourced provision for children with speech and language difficulties within West Horndon Primary School in Brentwood to meet the needs of a small number of children with specific speech and language difficulties who are able to access the national curriculum with specialist support.

Response:

Agree, insert suggested paragraphs to make effective. This is then in line with advice from the Local Education Authority.

Action:

Insert suggested paragraphs in line with the advice from the Local Educational Authority.

29577

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9649

Object

Summary of representations:

ECC as Education Authority notes that community use of playing fields and sports facilities of educational establishments can place operational and / or financial burdens on such establishments if not appropriately planned for and funded.

Criterion D of Policy PC15 needs to be amended to make it clear to applicants and decision makers that such use should be paid for and the financial burden does not fall on the educational establishment. This reflects ECC's position as set out in paragraph 1.3 of its Hearing Statement F128A.

Summary of representation changes to plan:

Replace word 'used' with the word 'available', and insert word 'paid' between words 'for' and 'community' in criterion D. of Policy PC15 Education Facilities

Response:

Disagree, not considered appropriate for policy to address, expected to be covered by user agreements between school and outside users.

Action:

No action required.

29632

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM73

9746

Support

Summary of representations:

The proposed modifications to paragraph 8.5 are considered in principle to be consistent with paragraphs 20, 92, 54 and 175 of the NPPF.

Summary of representation changes to plan:

N/A

Response:

Support welcomed

Action:

No action required.

29507

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9747

Support

Summary of representations:

Agree the conversationship of the trees and wildlife should be looked after

Summary of representation changes to plan:

N/A

Response:

Support welcomed.

Action:

No action required

29724

Support

Respondent: Gita Mackintosh [7214]

MM74

9750

Object

Summary of representations:

Protect and enhance the local environment. Do not build on R25 and R26.

Summary of representation changes to plan:

Remove R25 and R26

Response:

All sites allocated in the Local Plan have been through various assessments including a green belt assessment. The Council would not be able to meet its housing needs without removing some land from the green belt.

Action:

No action required

29496

Object

Respondent: Mr Richard Thwaite [6964]

29861

Object

Respondent: Mrs Edna Williams [4728]

9752

Support

Summary of representations:

A Local Planning Authority needs certainty of impacts from development prior to the determination of planning applications.

The proposed modification to paragraph 8.19 makes it clear that where insufficient information is provided to demonstrate the impacts (including cumulatively) of development on wildlife then the Council should refuse applications and not use conditions to secure such information

Summary of representation changes to plan:

N/A

Response:

Support welcomed.

Action:

No action required.

29508

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9753

Support

Summary of representations:

The proposed deletion of reference to the Essex Biodiversity Plan (2011) from paragraph 8.22 a. is acceptable as this is no longer considered 'live' by Government.

Summary of representation changes to plan:

N/A

Response:

Support welcomed

Action:

No action required

29509

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9754

Support

Summary of representations:

Natural England broadly agree that the majority of changes amount to a re-ordering of previous text, as opposed to a substantive change to policy. However, the new focus on planning for biodiversity net gain(s) to reflect evolving national policy context with regards to implementation of Biodiversity Net Gain and Local Nature Recovery Strategies is noted and welcomed by Natural England

Summary of representation changes to plan:

N/A

Response:

Support welcomed.

Action:

No action required

29848

Support

Respondent: Natural England [216]

Agent: Natural England (Ms Anna Oliveri) [9119]

9755

Object

Summary of representations:

Further revision to Policy NE01 is needed. See suggestion below.

Summary of representation changes to plan:

MM74 (c) should be re-worded as follows: 'Where a proposed plan or project is likely to have an adverse impact on a European Designated Site, alone or in combination, permission will not be granted unless there is due compliance with the requirements of the Habitats Regulations.' This is to make the statement more accurate and to better reflect the terminology used in legislation. MM74 (d) – policy wording should be updated to also apply to Epping Forest SAC

recreational pressure Zone of Influence (ZOI) and should make clear the mitigation hierarchy will be applied of avoidance first, mitigation second. We suggest the following wording: 'New residential development within the Essex RAMS and Epping Forest SAC Zones of Influence will be required to provide appropriate on-site measures for the avoidance of, and/or reduction in, recreational disturbance on European Designated Sites through the incorporation of recreational opportunities, including the provision of green space and footpaths in the proposals. Proposals will be required to follow the mitigation hierarchy by seeking to avoid creating recreational impacts first and foremost, with mitigation measures considered secondary to avoidance.' MM74 (e) makes provision to approve development that will likely have an adverse effect on SSSIs in exceptional circumstances when the benefit of the development clearly outweighs adverse impacts both to the individual SSSI identified as being at risk and the wider SSSI network. Please note that Natural England will object to any proposals brought forward that result in direct loss of SSSI habitat. Notwithstanding this, currently there does not appear to be any policy requirement for mitigation and / or compensation as appropriate, for compensatory habitat to be provided alongside development approved under these exceptional circumstances. Natural England therefore recommends the following paragraph is inserted to ensure any loss of SSSI habitat is adequately compensated for: 'Any development proposals exceptionally permitted will be expected to demonstrate the impacts cannot be avoided, and that any indirect effects are able to be fully mitigated. Whilst direct effects to SSSIs are not supported by the Plan, in such exceptional circumstances a robust compensation scheme will be expected. Applicants will need to demonstrate the efficacy of the mitigation or compensation scheme and provide an appropriate implementation, monitoring and management programme to underpin the scheme, the performance of which will be subject of a condition and/or planning obligation, as appropriate.' At Para 8.20, Natural England recommends re-wording as follows: 'Where Priority Habitats are likely to be adversely impacted by the proposal, the developer must demonstrate that every effort has been made to avoid adverse impacts. Mitigation and compensation measures will only be acceptable where it has been demonstrated impacts cannot be reasonably avoided in the first place. Impacts that cannot be avoided are to be mitigated onsite. Where residual impacts remain, offsite compensation will be required to ensure that there is no net loss in quantity and quality of Priority habitats in the borough of Brentwood.' This wording better reflects the mitigation hierarchy by ensuring the emphasis is placed on protecting habitats and avoiding impacts first-and-foremost, ahead of relying on mitigation and compensation measures, which invariably come with a degree of risk. At Para 8.24, Natural England recommends re-wording as follows: 'Recreational disturbance has been further considered in an Appropriate Assessment which has identified the need to prepare a Recreational disturbance Avoidance and Mitigation Strategy (RAMS) for these locations to deliver the mitigation necessary to avoid adverse effects on integrity from 'in-combination' impacts of residential development that is anticipated within the zone of influence.' This wording is more accurate because it references the 'Zones of Influence' that underpin the RAMS strategy. At Para 8.25, Natural England recommends the following adjustment to text to improve the accuracy of the statement – remove 'Essex-wide' in the first sentence. At the beginning of the second sentence, the text 'New residential development that is likely to affect the integrity of European sites...' should be replaced with 'Development that is likely to have a significant effect on European sites'. Also the second sentence, the reference to SSSIs should be removed, as they are not European sites. Policies Map - The last sentence of para 8.25 states 'The appropriate mitigation mechanisms are identified in the RAMS. The Zones of Influence affecting Brentwood are shown on the Policies Map.' Natural England note that the Epping Forest custom recreational pressure Zone of Influence (ZOI) of 6.2km is not shown on the Policies Map, however a small area of Brentwood Borough Council to the north west does fall within this zone. Currently, the precise extent of the Epping Forest recreational pressure ZOI is not yet finalised. Autumn surveys have suggested it should be marginally enlarged, however summer surveys that Natural England have previously advised in order to inform the precise extent of the ZOI have not been carried out, so the exact extent is still subject to change pending further evidence. Until updated evidence is forthcoming, Natural England continue to support use of the 6.2km zone. We acknowledge that unless evidence comes forward to demonstrate that an expansion of at least 1km, it is unlikely that Brentwood Borough Council will receive many planning applications that are required to mitigate. Notwithstanding this, for clarity and transparency any ZOI referred to in planning policy should be shown on the Policy Map to make clear the geographical area to which policy applies. On this basis, the Policies Map should be revised to show the Epping SAC ZOI, and to ensure a consistency of approach as the Essex RAMS ZOIs are indicated. It should be noted in the key on the Policy Map that the Epping Forest SAC may be subject to change, and the Policies Map may need to be updated in the future to reflect any evidence-based changes in the ZOI extent. Para 8.28 – Currently this paragraph states that Brentwood Borough Council falls outside of the Epping Forest SAC ZOI. This is incorrect. As noted in comments on para 8.25 above, a small area of Brentwood Borough Council does fall within the Epping Forest SAC ZOI. Policy wording should be changed as follows to reflect this: 'Prior to the

adoption of a Supplementary Planning Document, or similar, in respect of the Epping Forest SAC, development in the Zones of Influence will be required to make an appropriate assessment of the impact of the development and identify suitable mitigation proposals, in line with Natural England advice. Areas within Brentwood Borough Council fall just inside this ZOI. The Council will carefully consider the impacts to Epping Forest SAC, if any, of development falling within or adjacent to this ZOI. In order for this policy to be effective (and as noted in comments above on para 8.25), the extent of Epping Forest ZOI will need to be shown on the Policies Map so as to make clear the geographical area to which the policy applies.

Response:

Part agree, remove term 'Habitats Directive' as covered by term 'Habitats Regulations'. Remaining suggested modifications not considered necessary to make policy sound.

Action:

Remove 'Habitat Directive'

29849**Object**

Respondent: Natural England [216]

Agent: Natural England (Ms Anna Oliveri) [9119]

MM75**9758****Support****Summary of representations:**

The proposed modifications to Policy NE03 are considered in principle to be consistent with paragraph 180 of the NPPF.

Summary of representation changes to plan:

N/A

Response:

Support welcomed

Action:

No actions required

29510**Support**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9759**Object****Summary of representations:**

Existing flooding within Blackmore and surrounding area.

LDP is not sound by not being inclusive of existing and future flooding issues in the area and the impact a development of any size will have on increasing this threat and frequency. The release of two greenfield sites for building development is not sound. As they are important to provide a soak away buffer protecting the village from run off from higher land, which is the source of the River Wid. The robustness of the Sustainability Appraisal is questionable. As it did not specifically relate to the situation in Blackmore.

Summary of representation changes to plan:

Strain on already poor drainage Orchard Piece floods already. Full assessment and preventative steps need to be taken before any development. Green Belt is a gift and should be maintained for future generations.

Response:

The Council has consulted statutory bodies such as Environment Agency, Natural England and Essex County Council (Local Highways Authority, Lead Local Flood Authority, Lead Local Education Authority) throughout the plan-making process and will remain engaged with them at the planning application process. When developers submit relevant planning applications for development on site R25 and R26, detailed considerations including flood mitigations will be assessed and addressed at the planning application stage, informed by site specific detailed evidence.

Action:

No action required

30012**Object**

Respondent: Ms Nicky Carvell [6961]

MM78

9769

Object

Summary of representations:

Blackmore has a history of flooding, removing 2 large green fields will make the situation worse and is contrary to government guidelines.

Summary of representation changes to plan:

This looks to reviewed properly and the Environment Agency needs to be involved before this proceeds any further.
Remove R25 and R26

Response:

The Council has consulted Epping Forest District Council and statutory bodies such as Environment Agency, Natural England and Essex County Council (Local Highways Authority, Lead Local Flood Authority, Lead Local Education Authority) throughout the plan-making process and will remain engaged with them at the planning application process. When developers submit relevant planning applications for development on site R25 and R26, detailed considerations including but not limited to design, responding to the local characters, flood mitigations, highways access and safety, infrastructure contributions, will be assessed and addressed at the planning application stage, informed by site specific detailed evidence.

Action:

No action required

29836

Object

Respondent: Mr Graham Hesketh [8634]

29442

Object

Respondent: Dr. S.J. Jennings [1497]

29470

Object

Respondent: Mr Andrew Borton [9089]

29478

Object

Respondent: Mr Colin Herman [9090]

29497

Object

Respondent: Mr Richard Thwaite [6964]

29611

Object

Respondent: Mrs Helen Whalley [4233]

29639	Object
Respondent: Mrs Joanne Gill [4758]	
29643	Object
Respondent: Mrs Elisabeth Taylor [2918]	
29647	Object
Respondent: Mr Gary Taylor [8905]	
29692	Object
Respondent: Dr. S.J. Jennings [1497]	
29720	Object
Respondent: Mr Conrad Dixon [8688]	
29744	Object
Respondent: Dr Murray Wood [7003]	
29760	Object
Respondent: Mrs Judith Bowland [8642]	
29768	Object
Respondent: Bernard Allen [8830]	
29773	Object
Respondent: Mr Callum Cartwright [8370]	
29777	Object
Respondent: Mr Scott Gosling [9112]	
29781	Object
Respondent: Mr Christopher Gill [8492]	

29794	Object
Respondent: Blackmore Village Hall/Parish Council (Roger Keeble) [301]	
29789	Object
Respondent: Mr Anthony Cross [4376]	
29816	Object
Respondent: Mr John Hughes [4500]	
29862	Object
Respondent: Mrs Edna Williams [4728]	
29821	Object
Respondent: Mr Gary Sanders [4923]	
29892	Object
Respondent: Miss Isabella Thomasina Gahagan [9126]	
29843	Object
Respondent: Ms Victoria Sanders [8482]	
29900	Object
Respondent: Miss Claire Grant [8478]	
29903	Object
Respondent: Ms Jill Griffiths [5024]	
29909	Object
Respondent: Mr Nicholas Griffiths [9129]	
29915	Object
Respondent: Mr Marcus Forstner [8160]	

29929	Object
Respondent: Mrs Tracy Fox [9131]	
29933	Object
Respondent: Mr Derek Fox [9132]	
29937	Object
Respondent: Sally French [9031]	
29939	Object
Respondent: Mrs Wendy Fahy [9133]	
29941	Object
Respondent: Mr Pat Fahy [9022]	
29945	Object
Respondent: Mr John Eaton [8124]	
29952	Object
Respondent: Donna Eaton [8455]	
29959	Object
Respondent: Ann Eustace [9020]	
29967	Object
Respondent: Samantha Dunk [8438]	
29973	Object
Respondent: Mr Anthony Draper [9136]	
29983	Object
Respondent: Mrs Ruth Dimond [4851]	

29990	Object
Respondent: Mrs Gillean Driver [9138]	
29997	Object
Respondent: Mrs Patricia Dillon [8417]	
30000	Object
Respondent: Mr David Coates [8133]	
30001	Object
Respondent: Miss Nicole Corse [9139]	
30005	Object
Respondent: Ms Linda Cearns [5013]	
30014	Object
Respondent: Mr Tony Chaplin [9142]	
30019	Object
Respondent: Mrs Margaret Cartwright [7195]	
30024	Object
Respondent: Mr David Cartwright [7193]	
30033	Object
Respondent: Mr Kenneth Herring [4841]	
30041	Object
Respondent: Mr Keith Creffield [8001]	
30049	Object
Respondent: Mrs Joann Cook [8669]	

30051	Object
Respondent: Mr Tony Cook [8670]	
30052	Object
Respondent: Mr Derek Clark [9146]	
30053	Object
Respondent: Mrs Margaret Clark [9147]	
30054	Object
Respondent: Mrs Karen Cohen [8901]	
30057	Object
Respondent: Mrs Patricia Chaplin [9148]	
30060	Object
Respondent: Mrs Jacqueline Butler [9149]	
30070	Object
Respondent: Mr Simon Adams [9151]	
30073	Object
Respondent: Mrs Christina Atkins [8118]	
30078	Object
Respondent: Mrs Anne Adkins [8735]	
30082	Object
Respondent: Mr John Adkins [8734]	
30083	Object
Respondent: Mr Peter Adams [9152]	

30084	Object
Respondent: Mrs Jean Adams [9153]	
30086	Object
Respondent: Mrs Toni Allen [8832]	
30088	Object
Respondent: Mr Mark Allen [8831]	
30093	Object
Respondent: Miss Tallulah Allen [8833]	
30100	Object
Respondent: Mr Michael Black [1291]	
30101	Object
Respondent: Mrs Rosemary Blowes [8857]	
30108	Object
Respondent: Mrs Ella Bradley [4875]	
30115	Object
Respondent: Mr Alan Butler [9157]	
30120	Object
Respondent: Mrs Donna Bradley [9158]	
30127	Object
Respondent: Elaine Bateman [9159]	
30131	Object
Respondent: Mr Jeffrey Butler [9161]	

30135	Object
Respondent: Mr Alan Bowland [8121]	
30146	Object
Respondent: Mr Richard Fisher [8480]	
30148	Object
Respondent: Mrs Hayley Maclaurin [7097]	
30150	Object
Respondent: Mr Stuart Moulder [4713]	
30154	Object
Respondent: Mr Duncan Maclaurin [8976]	
30158	Object
Respondent: Mrs Diane Mills [8533]	
30169	Object
Respondent: Mr Peter Mills [6982]	
30176	Object
Respondent: Mrs Fleur Morgan [4848]	
30192	Object
Respondent: Mrs Lorraine Murrell [8519]	
30198	Object
Respondent: Mr Andrew Moulton [9162]	
30204	Object
Respondent: Mr David Janes [8935]	

30209	Object
Respondent: Mr Keith Lodge [8969]	
30216	Object
Respondent: Mrs Jane Lodge [8006]	
30221	Object
Respondent: Mrs Brenda Leigh [9163]	
30240	Object
Respondent: Mr Marc Cohen [4268]	
30253	Object
Respondent: Mr Richard Reed [4708]	
30262	Object
Respondent: Mrs Terri Reed [4303]	
30280	Object
Respondent: Mr Kevin Joyner [8375]	
30283	Object
Respondent: Miss Natalie Keefe [9166]	
30286	Object
Respondent: Mrs Catherine Jennings [8693]	
30298	Object
Respondent: Mrs Janet Jacob [8692]	
30305	Object
Respondent: Mr Steven Jacobs [4408]	

30311	Object
Respondent: Mrs Elaine Jones [9170]	
30315	Object
Respondent: Ms Annie Jackson [8921]	
30322	Object
Respondent: Mrs Iris Jones [8495]	
30327	Object
Respondent: Mrs Charlotte Howse [8915]	
30332	Object
Respondent: Mr Ben Holmes [8654]	
30336	Object
Respondent: Ms Madeleine Harrop [9171]	
30345	Object
Respondent: Mr Fraser House [9173]	
30347	Object
Respondent: Mr Raymond Charles Hood [9174]	
30350	Object
Respondent: Mr Raymond Hatfield [8869]	
30354	Object
Respondent: Ms Cherie Hicks [9175]	
30358	Object
Respondent: Mr Adam Harris [8679]	

30359	Object
Respondent: Mrs Nicola Holmes [8668]	
30363	Object
Respondent: Mrs Melanie Sanders [8511]	
30367	Object
Respondent: Susan Harris [8686]	
30374	Object
Respondent: Mrs Kathryn Hurford [4275]	
30377	Object
Respondent: Ms Elaine Harris [8667]	
30379	Object
Respondent: Mr Michael Juniper [8129]	
30386	Object
Respondent: Mr John Lester [4396]	
30390	Object
Respondent: Mr Stephen Newton [8601]	
30395	Object
Respondent: Mrs Danielle Cohen [8313]	
30401	Object
Respondent: Mr Gerald Mountstevens [4911]	
30405	Object
Respondent: Mrs Patricia Mountstevens [9012]	

30412	Object
Respondent: Miss Laura Harris [8685]	
30421	Object
Respondent: Ms Patricia Taylor [6880]	
30429	Object
Respondent: Mrs Patricia Moulton [9176]	
30436	Object
Respondent: Mr Malcolm Hurford [7304]	
30445	Object
Respondent: Mr Luke Holmes [8652]	
30452	Object
Respondent: Vera Read [8865]	
30455	Object
Respondent: Mr Kenneth Read [9178]	
30459	Object
Respondent: Mrs Jeanette Richardson [9179]	
30464	Object
Respondent: Mr Keith Richardson [8192]	
30467	Object
Respondent: Mr Brian Rigby [9180]	
30471	Object
Respondent: Mrs Susan Hood [9181]	

30475	Object
Respondent: Mr Ken Holmes [8691]	
30482	Object
Respondent: Mr Andrew Harris [8628]	
30483	Object
Respondent: Mrs Sara Harris [8122]	
30488	Object
Respondent: Mr James Harris [8678]	
30495	Object
Respondent: Mrs Lucille Foreman [8574]	
30501	Object
Respondent: Mr Colin Foreman [4394]	
30509	Object
Respondent: Blackmore Village Heritage Association [8568]	
Agent: Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]	
30515	Object
Respondent: Mrs Ann Rigby [9182]	
30520	Object
Respondent: Mr Peter Ryan [4937]	
30525	Object
Respondent: Ms Jane Rogers [9183]	
30532	Object
Respondent: Ms. Donna Toomey [8024]	

30537 **Object**

Respondent: Mrs Joanne Ryan [8889]

30541 **Object**

Respondent: Mrs Susan Webb [4919]

30545 **Object**

Respondent: Mrs Joan Westover [4635]

30558 **Object**

Respondent: Mr John Richardson [4858]

30573 **Object**

Respondent: Mrs Judith Wood [4852]

30575 **Object**

Respondent: Mrs Alison Ratcliffe [5040]

30565 **Object**

Respondent: Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]

30579 **Object**

Respondent: Mr Stuart Townsend [8419]

30592 **Object**

Respondent: Mr Raymond Thompson [4840]

30593 **Object**

Respondent: Mrs Sylvia Pascoe [7953]

30599 **Object**

Respondent: Mr Gary Durdant-Pead [8326]

30602	Object
Respondent: Mrs Claire Sears [9187]	
30608	Object
Respondent: Mrs Rita Tuffey [4620]	
30612	Object
Respondent: Mrs Louise Roast [9188]	
30618	Object
Respondent: Mr Michael Pinato [9189]	
30622	Object
Respondent: Mrs Natalie Walters [8959]	
30627	Object
Respondent: Mr Nicholas Wilkinson [8406]	
30631	Object
Respondent: Mr Eric John Webb [1830]	
30636	Object
Respondent: Mr Derek Tillet [8923]	
30641	Object
Respondent: Mr & Mrs Ian and Janet Tennet [9191]	
30646	Object
Respondent: Mr Finn Thompson [9192]	
30654	Object
Respondent: Mrs Christine Tabor [8427]	

30658 **Object**

Respondent: Mr Frank Tabor [8424]

30663 **Object**

Respondent: Mr Iain Stratton [9194]

30664 **Object**

Respondent: Mr Hugh Rayner [8011]

30671 **Object**

Respondent: Mrs Rebecca Philpot [9197]

30675 **Object**

Respondent: Mr Kyle Pounds [9198]

30682 **Object**

Respondent: Mr Craig Philpot [9200]

30686 **Object**

Respondent: Mrs Julie Pounds [8608]

30696 **Object**

Respondent: Mrs Sophia Severn [9202]

30697 **Object**

Respondent: Mrs Lynn Strange [9203]

30708 **Object**

Respondent: Mr Keith Pope [9206]

30709 **Object**

Respondent: Mr Frederick Piper [8380]

30710	Object
Respondent: Mrs Debbie Spencer [6959]	
30716	Object
Respondent: Mr Lloyd Piper [8616]	
30726	Object
Respondent: Mrs Jennifer Sirrell [8093]	
30727	Object
Respondent: Mrs Marquite Peacham [8999]	
30733	Object
Respondent: Mrs Faye Osborne [8458]	
30736	Object
Respondent: Mrs Maureen Slimm [5042]	
30740	Object
Respondent: Mr Darryl Pounds [8609]	
30758	Object
Respondent: Ms Judith Phillips [8615]	
30760	Object
Respondent: Mr Ronald Sanders [9209]	
30767	Object
Respondent: Mrs Sandra Price [9210]	
30771	Object
Respondent: Collin Sherwood [8908]	

30775	Object
<hr/>	
Respondent: Mr David Olley [8461]	
30778	Object
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Respondent: Mrs Valerie Sherwood [8015]	
30784	Object
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Respondent: Mrs Jemma Olley [8462]	
30789	Object
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Respondent: Mr Raymond Price [9211]	
30792	Object
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Respondent: Mrs Beth Pardoe [8613]	
30795	Object
<hr/>	
Respondent: Mr David Smith [4872]	
30796	Object
<hr/>	
Respondent: Mr Albert Pardoe [8002]	
30801	Object
<hr/>	
Respondent: Mrs Paula Pegram [8625]	
30803	Object
<hr/>	
Respondent: Mrs Abbie Smith [9213]	
30810	Object
<hr/>	
Respondent: Mr David Pegram [8622]	
30814	Object
<hr/>	
Respondent: Mr Richard Smith [9214]	

30816**Object**

Respondent: Mr Stephen Scott [8896]

30821**Object**

Respondent: Mr Terence Stenning [8544]

9771**Support**

Summary of representations:

ECC as Lead Local Flood Authority are satisfied in principle with the amended policy for NE06 Flood Risk.

Summary of representation changes to plan:

N/A

Response:

Support welcomed

Action:

No action required

29511**Support**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9772**Object**

Summary of representations:

ECC as Lead Local Flood Authority recommends that paragraph 8.57 is amended to provide the correct technical term for the assessment in relation to infiltration.

Summary of representation changes to plan:

Replace the word 'drainage' between the words 'site-specific' and 'assessment' with the word 'geotechnical' in the last but one sentence of paragraph 8.57

Response:

Agree, amend paragraph 8.57 as suggested to make effective

Action:

Amending wording as suggested

29633**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM80

9774

Support

Summary of representations:

Modifications to policy NE08 are proposed to make it clear that external lighting as part of proposed development will be supported provided inter alia it does not give rise to unacceptable impacts on night sky, or an unacceptable increase in sky glow. We agree that these modifications are necessary in order to make the BLP sound. This change is necessary to ensure the policy is not overly restrictive in terms of external lighting. As previously worded, a decision-maker could have inferred that almost any external lighting would have been contrary to policy

Summary of representation changes to plan:

N/A

Response:

Support welcomed

Action:

No action required

30229

Support

Respondent: St Modwen Properties PLC and S&J Padfield and Partners [8835]

Agent: Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

MM81

9782

Mixed

Summary of representations:

Blackmore does not align with being an 'exceptional circumstance', especially regarding having good connectivity. There are no main roads, all roads out are country lanes and the only transport is a very limited bus service. It is not within an easy commute to a train station apart from by car which is not an environmentally safe option. No strategic approach has been applied and I believe there is greenbelt land in places much better suited with better infrastructure and transport. less

Summary of representation changes to plan:

Properly review the available greenbelt land in the other areas where there is no proposed development but could be better suited for development due to the existing infrastructure they have in place. This would show that a strategic approach has been considered and all options have been reviewed. Remove R25 and R26 from the plan.

Response:

The Council has consulted Epping Forest District Council and statutory bodies such as Environment Agency, Natural England and Essex County Council (Local Highways Authority, Lead Local Flood Authority, Lead Local Education Authority) throughout the plan-making process and will remain engaged with them at the planning application process. When developers submit relevant planning applications for development on site R25 and R26, detailed considerations including but not limited to design, responding to the local characters, flood mitigations, highways access and safety, infrastructure contributions, will be assessed and addressed at the planning application stage, informed by site specific detailed evidence.

Action:

No action required

29837

Object

Respondent: Mr Graham Hesketh [8634]

29471

Object

Respondent: Mr Andrew Borton [9089]

29477

Object

Respondent: Mr Colin Herman [9090]

29498

Object

Respondent: Mr Richard Thwaite [6964]

29644

Object

Respondent: Mrs Elisabeth Taylor [2918]

29612	Object
Respondent: Mrs Helen Whalley [4233]	
29726	Object
Respondent: Gita Mackintosh [7214]	
29640	Object
Respondent: Mrs Joanne Gill [4758]	
29761	Object
Respondent: Mrs Judith Bowland [8642]	
29648	Object
Respondent: Mr Gary Taylor [8905]	
29769	Object
Respondent: Bernard Allen [8830]	
29745	Object
Respondent: Dr Murray Wood [7003]	
29782	Object
Respondent: Mr Christopher Gill [8492]	
29788	Object
Respondent: Mr Anthony Cross [4376]	
29795	Object
Respondent: Blackmore Village Hall/Parish Council (Roger Keeble) [301]	
29822	Object
Respondent: Mr Gary Sanders [4923]	

29844	Object
Respondent: Ms Victoria Sanders [8482]	
29896	Object
Respondent: Mr Terry Geary [8494]	
29898	Object
Respondent: Mr Terry Gahagan [9128]	
29899	Object
Respondent: Miss Claire Grant [8478]	
29904	Object
Respondent: Ms Jill Griffiths [5024]	
29910	Object
Respondent: Mr Nicholas Griffiths [9129]	
29916	Object
Respondent: Mr Marcus Forstner [8160]	
29923	Object
Respondent: Mrs Ceri Fisher [8459]	
29946	Object
Respondent: Mr John Eaton [8124]	
29953	Object
Respondent: Donna Eaton [8455]	
29960	Object
Respondent: Ann Eustace [9020]	

29968	Object
Respondent: Samantha Dunk [8438]	
29976	Object
Respondent: Mr Daniel Dean [9137]	
29984	Object
Respondent: Mrs Ruth Dimond [4851]	
29991	Object
Respondent: Mrs Gillean Driver [9138]	
30015	Object
Respondent: Mr Tony Chaplin [9142]	
30020	Object
Respondent: Mrs Margaret Cartwright [7195]	
30025	Object
Respondent: Mr David Cartwright [7193]	
30034	Object
Respondent: Mr Kenneth Herring [4841]	
30042	Object
Respondent: Mr Keith Creffield [8001]	
30058	Object
Respondent: Mrs Patricia Chaplin [9148]	
30061	Object
Respondent: Mrs Jacqueline Butler [9149]	

30071	Object
Respondent: Mrs Toni Allen [8832]	
30079	Object
Respondent: Mrs Anne Adkins [8735]	
30089	Object
Respondent: Mr Mark Allen [8831]	
30099	Object
Respondent: Ms Pam Blackmore [8856]	
30102	Object
Respondent: Mr Colin Budd [8871]	
30107	Object
Respondent: Mrs Ella Bradley [4875]	
30116	Object
Respondent: Mr Alan Butler [9157]	
30122	Object
Respondent: Mrs Pamela Bailey [8010]	
30136	Object
Respondent: Mr Alan Bowland [8121]	
30147	Object
Respondent: Mr Richard Fisher [8480]	
30173	Object
Respondent: Mrs Fleur Morgan [4848]	

30179	Object
Respondent: Mr Stephen Murrell [8517]	
30183	Object
Respondent: Mrs Susan Miers [8695]	
30189	Object
Respondent: Mr Colin Miers [3959]	
30193	Object
Respondent: Mrs Lorraine Murrell [8519]	
30199	Object
Respondent: Mr Andrew Moulton [9162]	
30205	Object
Respondent: Mr David Janes [8935]	
30210	Object
Respondent: Mr Keith Lodge [8969]	
30218	Object
Respondent: Mrs Jane Lodge [8006]	
30241	Object
Respondent: Mr Marc Cohen [4268]	
30252	Object
Respondent: Mr Richard Reed [4708]	
30263	Object
Respondent: Mrs Terri Reed [4303]	

30284	Object
Respondent: Miss Natalie Keefe [9166]	
30299	Object
Respondent: Mrs Janet Jacob [8692]	
30306	Object
Respondent: Mr Steven Jacobs [4408]	
30316	Object
Respondent: Ms Annie Jackson [8921]	
30323	Object
Respondent: Mrs Iris Jones [8495]	
30328	Object
Respondent: Mrs Charlotte Howse [8915]	
30333	Object
Respondent: Mr Ben Holmes [8654]	
30340	Object
Respondent: Mrs Jane House [8681]	
30346	Object
Respondent: Mr Fraser House [9173]	
30355	Object
Respondent: Ms Cherie Hicks [9175]	
30364	Object
Respondent: Mrs Melanie Sanders [8511]	

30369	Object
Respondent: Susan Harris [8686]	
30375	Object
Respondent: Mrs Kathryn Hurford [4275]	
30378	Object
Respondent: Ms Elaine Harris [8667]	
30387	Object
Respondent: Mr John Lester [4396]	
30396	Object
Respondent: Mrs Danielle Cohen [8313]	
30414	Object
Respondent: Miss Laura Harris [8685]	
30422	Object
Respondent: Ms Patricia Taylor [6880]	
30430	Object
Respondent: Mrs Patricia Moulton [9176]	
30438	Object
Respondent: Mr Malcolm Hurford [7304]	
30440	Object
Respondent: Mr Kevin Wood [6965]	
30447	Object
Respondent: Mr Luke Holmes [8652]	

30453	Object
Respondent: Vera Read [8865]	
30456	Object
Respondent: Mr Kenneth Read [9178]	
30461	Object
Respondent: Mrs Jeanette Richardson [9179]	
30465	Object
Respondent: Mr Keith Richardson [8192]	
30476	Object
Respondent: Mr Ken Holmes [8691]	
30496	Object
Respondent: Mrs Lucille Foreman [8574]	
30502	Object
Respondent: Mr Colin Foreman [4394]	
30510	Object
Respondent: Blackmore Village Heritage Association [8568] Agent: Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]	
30516	Object
Respondent: Mrs Ann Rigby [9182]	
30521	Object
Respondent: Mr Peter Ryan [4937]	
30528	Object
Respondent: Mrs Margaret Roast [9184]	

30533 **Object**

Respondent: Ms. Donna Toomey [8024]

30538 **Object**

Respondent: Mrs Joanne Ryan [8889]

30546 **Object**

Respondent: Mrs Joan Westover [4635]

30559 **Object**

Respondent: Mr John Richardson [4858]

30576 **Object**

Respondent: Mrs Alison Ratcliffe [5040]

30568 **Object**

Respondent: Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]

30580 **Object**

Respondent: Mr Stuart Townsend [8419]

30600 **Object**

Respondent: Mr Gary Durdant-Pead [8326]

30606 **Object**

Respondent: Mrs Carol Poulton [8119]

30613 **Object**

Respondent: Mrs Louise Roast [9188]

30623 **Object**

Respondent: Mrs Natalie Walters [8959]

30628	Object
Respondent: Mr Nicholas Wilkinson [8406]	
30632	Support
Respondent: Mr Callum Togwell [9190]	
30638	Object
Respondent: Mr Derek Tillet [8923]	
30653	Object
Respondent: Mrs Christine Tabor [8427]	
30659	Object
Respondent: Mr John Sears [9193]	
30660	Object
Respondent: Mr Frank Tabor [8424]	
30667	Object
Respondent: Mr Stephen Poulton [8149]	
30676	Object
Respondent: Mr Kyle Pounds [9198]	
30687	Object
Respondent: Mrs Julie Pounds [8608]	
30690	Object
Respondent: Mr Charles Snape [9201]	
30711	Object
Respondent: Mrs Debbie Spencer [6959]	

30717 **Object**

Respondent: Mr Lloyd Piper [8616]

30741 **Object**

Respondent: Mr Darryl Pounds [8609]

30748 **Object**

Respondent: Mrs Faye Osborne [8458]

30761 **Object**

Respondent: Mr Ronald Sanders [9209]

30768 **Object**

Respondent: Mrs Sandra Price [9210]

30776 **Object**

Respondent: Mr David Olley [8461]

30777 **Object**

Respondent: Mrs Valerie Sherwood [8015]

30788 **Object**

Respondent: Mrs Jemma Olley [8462]

30790 **Object**

Respondent: Mr Raymond Price [9211]

30794 **Object**

Respondent: Mrs Beth Pardoe [8613]

30797 **Object**

Respondent: Mr Albert Pardoe [8002]

30804**Object****Respondent:** Mrs Abbie Smith [9213]

30811**Object****Respondent:** Mr David Pegram [8622]

30815**Object****Respondent:** Mr Richard Smith [9214]

9785**Object****Summary of representations:**

The consolidation of Green Belt policies into Strategic Policy MG02 has resulted in support for rural exception sites being removed from the Plan, contrary to paragraph 78 of the NPPF, and consequently the plan as modified is unsound.

Summary of representation changes to plan:

The issue can be remedied by offering explicit support for rural exception sites in the Plan, and by modifying Strategic Policy MG02 to include the exceptions listed in paragraph 149 of the NPPF, with specific reference to bullet f regarding the provision of affordable housing for local community needs.

Response:

Rural exception sites can come forward in any rural location, including areas designated as Green Belt as set out in the NPPF and Planning Practice Guidance - Housing needs of different groups, the proposed modification would not prevent such schemes coming forward in accordance with National Guidance.

Action:

No change required

29706**Object****Respondent:** CPC Ltd (Mr Jeremy Heppell, Planning Director) [9098]

MM83

9550

Object

Summary of representations:

R19 Land at Priests Lane - 75 is an over development.

More cars, green space taken away leads to poor air quality

Only one access at dangerous point, no independent assessment of safety or traffic flow. Residents concerns ignored.

Summary of representation changes to plan:

None required

Response:

Site density supported by examination note F78. Access considered acceptable by Local Highway Authority.

Action:

None required

29570

Object

Respondent: Mrs Helen Pearson [5910]

9552

Object

Summary of representations:

Disagree with building on William Hunter way, north shenfield, doddinghurst road, wates way and nags head lane. These sites are already densely populated with poor road infrastructure. Public transport won't solve grid lock traffic. Also there will be too much pressure on school places and health. This isn't thought through. There is no village feel it will be densely London suburbia. Completely goes against maintaining a village feel and characteristics of Brentwood. The town is changing rapidly and this just doesn't match against the proposed ethos.

Summary of representation changes to plan:

None required

Response:

Identification of sites is in line with spatial strategy. Potential impacts on local infrastructure have been identified with necessary infrastructure set out in the Infrastructure Delivery Plan.

Action:

None required

29728

Object

Respondent: Gita Mackintosh [7214]

9553**Object****Summary of representations:**

Why build where there is a risk of flooding? This shows infrastructure is not sound.

Summary of representation changes to plan:

None required

Response:

Strategic Flood Risk Assessment provides supporting evidence for the plan. Criterion are added to those site allocations where located in critical drainage areas to ensure future development proposals incorporate necessary mitigation measures.

Action:

None required

29729**Object**

Respondent: Gita Mackintosh [7214]

MM84**9554****Object****Summary of representations:**

3. Not Effective

To be consistent with the wording associated with DH01f the title needs to include the word 'Active'.

This reflects ECC's Reg.19 Rep 22435 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

Summary of representation changes to plan:

Amend paragraph 9.20 DH01f as follows:

DH01f: Active and Sustainable Travel

Response:

Agree, amend paragraph 9.20 as suggested to make effective.

Action:

Amend paragraph 9.20 DH01f as follows:

DH01f: Active and Sustainable Travel

29634**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9555**Object****Summary of representations:**

DH02b in paragraph 9.21 needs to be amended to allow for the appropriate opportunities for all learners of all ages to be considered, and to be consistent with the proposed modification to paragraph 9.72 (MM85).

This reflects ECC's Reg.19 Rep 22436 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

Summary of representation changes to plan:

Amend paragraph 9.21 DH02b to read:

DH02b: ALL THROUGH LEARNING. Development that delivers exemplar education facilities that meet the needs of all types of learners through life, from nursery through to adult learning opportunities.

Response:

Agree, amend paragraph 9.21 as suggested to make effective.

Action:

Amend paragraph 9.21 DH02b to read:

DH02b: ALL THROUGH LEARNING. Development that delivers exemplar education facilities that meet the needs of all types of learners through life, from nursery through to adult learning opportunities.

29635**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9556**Object****Summary of representations:**

The proposed modification to remove reference to Garden City Principles in criterion 3. is inconsistent with Paragraph 73.c of the NPPF, which includes the use of Garden City Principles to set clear expectations for the quality and maintenance of places.

Reference to Garden City Principles needs to be reinstated to reflect this.

This reflects ECC's Reg.19 Rep 22438 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

Summary of representation changes to plan:

Amend Policy R01 (I) criterion 3 to read

The development proposals shall be underpinned by Garden City principles and qualities and accord with all other relevant policies in this Plan (including the master planning and delivery requirements of R01(ii)).

Include reference to the relevant Garden City Principles, such as those from TCP in the supporting text.

Response:

Disagree, suggested amendment not required, Policy R01 (II) A 2 b) already covers this point.

Action:

None required

29636**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9557**Object****Summary of representations:**

Refer NPPF Paragraph 73 b -sufficient access to services and employment opportunities within development (without unrealistic level of self-containment), or in larger towns (good access).

Given scale of population growth proposed, constrained access to employment opportunities at nearby economic centres, and mixed-use nature of Village / local centres, criterion 5 should state "at least 5.5 hectares of employment development" instead of "around 5.5 hectares".

To ensure demand and values are sufficient to induce development, criterion 5 needs to state "distributed across the Employment Hub and Village / local centres" instead of "distributed across the village".

Summary of representation changes to plan:

Amend criterion 5 of Policy R01 (i) to read:

Development proposals shall deliver at least 5.5 hectares of employment development distributed across the employment hub and village / local centres that may include office, light industrial and research and development uses coming within use class E and other employment development that is complementary to, and compatible with, the residential development

Response:

Disagree, the term 'around' is considered appropriate and consistent with the wording for other site policies. Other suggested text not considered necessary to make the policy sound.

Action:

None required

29637**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9558**Object****Summary of representations:**

ECC as appropriate authority with responsibilities for education provided BBC with education and childcare requirements for DHGV at Reg.19 and agreed position in Statement of Common Ground (F17D).

ECC is not satisfied that wording in criteria 7 a, b, c and d of Policy R01 (i) will ensure education and childcare requirements are provided for on-site.

Criterion 7. a. is misleading. 7.9ha of land allows sufficient space for secondary school only. Additional 2.1ha required to co-locate with primary school/EYCC.

This reflects ECC's position in Statement of Common Ground with BBC (F17D).

Summary of representation changes to plan:

Replace Policy R01 (i) criterion 7. with the following:

- a. land for one secondary school (Class F1) circa 7.9 hectares;
- b. land for three co-located primary schools and early years and childcare facilities (Class F1) circa 2.1 hectares each;
- c. the secondary school site (a) should be co-located with one of the three primary school/early years and childcare sites (b) to provide for the option of an all through school;
- d. land for one stand-alone early years and childcare facility (Class F1) circa 0.13 hectares.

Response:

Part agree, to make it clearer on the land requirements for secondary and primary schools. Do not agree with stipulation that the secondary school 'should' be co-located as this would preclude an option whereby ECC would not take on the secondary school.

Action:

Replace Policy R01 (i) criterion 7. with the following:

- a. land for one secondary school (Class F1) circa 7.9 hectares;
- b. land for three co-located primary schools and early years and childcare facilities (Class F1) circa 2.1 hectares each;
- c. the secondary school site (a) could be co-located with one of the three primary school/early years and childcare sites (b) to provide for the option of an all through school;
- d. land for one stand-alone early years and childcare facility (Class F1) circa 0.13 hectares.

29578**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9559

Object

Summary of representations:

Replace criterion 9 wording 'sustainable transport hub' with 'Mobility Hub' to ensure consistency of wording with remainder of Policy R01 (i) and Policy R01 (ii).

Policy and supporting text are silent on what constitutes 'Mobility Hub'. Provide clarity in supporting text.

Replace 'that should relate well to' with 'within' to provide clarity on intended location.

Insert additional wording at end of sentence to reference subsidiary hubs within local centres on site to ensure all residents and businesses within site allocation have reasonable access to mobility hubs - in line with NPPF 112.

Summary of representation changes to plan:

Provide supporting text to define 'Mobility Hub'.

Amend criterion 9 to read:

Development proposals shall make provision for a Mobility hub within the district centre and subsidiary hubs within the local centres.

Response:

Partly agree, term 'sustainable transport' to change to 'Mobility' to be consistent with referencing in the rest of the policy and make policy effective. Disagree with remaining suggested modifications relating to 'subsidiary hubs' which have not previously been raised.

Action:

Amend criterion 9 to read:

Development proposals shall make provision for a Mobility hub that should relate well to the district centre.

29651

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9560

Object

Summary of representations:

Welcome the deletion of text which requires land on the eastern boundary of Dunton Hills Garden Village to include measures which reinforce the beneficial purpose and use of the green belt in that zone.

Concerned regarding revised wording of Policy R01(I)(2)(A)(e) which includes 'to ensure visual separation from Basildon'.

Summary of representation changes to plan:

Revise criterion 2, A (e) with regards to term 'visual separation from Basildon'

Response:

Disagree, this part of the policy is still considered appropriate as it ensures the consideration of visual relationship with surrounding area.

Action:

None required

29825

Object

Respondent: Bellway Homes Ltd [6646]

Agent: Turley (Mr David Murray-Cox, Director) [9116]

9561

Object

Summary of representations:

The majority of changes proposed by the Main Modifications amount to a re-ordering of previous text and re-wording to better reflect national planning policy wording, as opposed to a substantive change to policy. However, previously, the policy agreed with Natural England in the Statement of Common Ground (SoCG) sought to secure delivery of the following:

- (i) GI screening adjacent to A127, A128 and rail tracks
- (ii) A green infrastructure buffer / wedge on the eastern boundary

The new policy wording omits this detail and defers to the Dunton Hills SPD document (currently being updated) for detailed design matters.

Summary of representation changes to plan:

The new policy wording omits this detail and defers to the Dunton Hills SPD document (currently being updated) for detailed design matters. Therefore the above points should be added into the SPD as specific numbered points in the 'guidance' boxes on the appropriate pages.

Response:

Agree, points to be added to the SPD as suggested.

Action:

Add the following matters to the DHGV SPD:

- (i) GI screening adjacent to A127, A128 and rail tracks
- (ii) A green infrastructure buffer / wedge on the eastern boundary

29850

Object

Respondent: Natural England [216]

Agent: Natural England (Ms Anna Oliveri) [9119]

9562

Object

Summary of representations:

MM84 relates to changes to Policy R01(l). CEG support the amendments as these make the policy clearer and more effective; specifically, the proposed quantum and sizes of the various types of uses that will be accommodated at Dunton Hills Garden Village. This includes the potential for a co-located primary and secondary school on a 7.9ha site. However, amendments are still required to ensure the policy is effective (NPPF, Paragraph 35) and clearer.

Summary of representation changes to plan:

Amend 4.a. to read: 4. Development proposals shall deliver an appropriate variety of housing typologies types and tenures in accordance with the Borough's identified needs and the specific needs of Dunton Hills Garden Village. They shall include the provision of: a. self-build and custom build plots in accordance with Policy HP01 Amend c. to read: c. affordable housing in general accordance with Policy HP05; Amend d. to read: d. the provision of 5 serviced Gypsy and Traveller pitches, the location of the pitches and the timing of their provision to be identified in the masterplan Amend 5 to read: 5. Development proposals shall deliver around 5.5 hectares of employment development distributed across the village that may include office, light industrial and research and development uses coming within use class E and other employment development (including Class B8 development) that is complementary to, and compatible with, the residential development. Amend 7 & 8 to read: 7. Development proposals shall make provision for: ... d. An additional stand-alone early years and childcare nursery (around 0.13 hectares). 8. Not less than 50% of the total allocated area shall comprise green and blue infrastructure [ADD FOOTNOTE] which should, so far as possible, be of a multi-functional nature. Foot Note: As defined by the TCPA: "Green infrastructure is not simply an alternative description for conventional open space. It includes parks, open spaces, playing fields, woodlands – and also street trees, allotments, private gardens, green roofs and walls, sustainable drainage systems (SuDS) and soils. It includes rivers, streams, canals and other water bodies, sometimes called 'blue infrastructure'. Amend 9 to read: 9. Development proposals shall make provision for a sustainable mobility hub that should relate well to the district centre."

Response:

Part 4c) Disagree, do not consider addition of 'general' is necessary to make policy sound. Would result in policy being vague and not effective.

Part 4d) Disagree, suggested deletion is not necessary. Wording as originally drafted is effective and sound to ensure delivery of identified G&T need.

Part 5 Part agree, insert '(including Class B8 development)' to make policy effective. Suggested deletion of text not considered necessary to make policy sound.

Part 7d) See response to ECC representation on MM84 on this part of the policy.

Part 8 Disagree, not necessary, TCPA guidance already referenced elsewhere in the plan in paragraph 9.14 & 9.15 & 9.28.

Part 9 Agree, amend policy as suggested to ensure consistency of terminology throughout policy and to make effective.

Action:

Amend part 5 of policy to read:

...development uses coming within use class E and other employment development (including Class B8 development) that is complementary to and compatible with the residential development.

Amend part 9 of policy to read:

Development proposals shall make provision for a sustainable mobility hub that should relate well to the district centre.

30224

Object

Respondent: CEG Land Promotions Limited [5050]

Agent: Lichfields (Ms Rachel Clements, Associate Director) [9145]

MM85

9568

Support

Summary of representations:

The modified policy is supported as it would be considered to accord with Government policy in paragraph 99 of the NPPF (2021).

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29460

Support

Respondent: Sport England (Mr. Roy Warren, Planning Manager) [4294]

9570

Support

Summary of representations:

The modification to Paragraph 9.72 allows for the appropriate opportunities for all learners of all ages to be considered.

This modification addresses ECC's Reg.19 Rep 22442 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29512

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9575

Object

Summary of representations:

Criterion A.1. needs to be amended to make it clear what is required of the applicant.

Summary of representation changes to plan:

Amend criterion A.1. to read:

All development proposals in relation to the site shall be in accordance with an approved masterplan. The masterplan shall;

- i. relate to the whole of the allocated site and be produced in consultation with local communities and all relevant stakeholders;
- ii. include a statement that sets out how community and stakeholder involvement has influenced the design and layout of the submitted scheme and its intended delivery; and
- iii. be submitted to the Council for its approval as part of the initial application for planning permission.

Response:

Disagree, suggested modifications not considered to be necessary in order to make the policy sound.

Action:

None required

29652

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9578

Object

Summary of representations:

As currently drafted, criterion A.2.d. indicates that highway and other sustainable modes of travel should be identified separately. Reference needs to be made to 'movement corridors' rather than 'internal highway links' to ensure that the design of DHGV minimises the scope for conflict between pedestrians, cyclists and vehicles, as set out in paragraphs 110 and 112 of the NPPF.

Summary of representation changes to plan:

Amend criterion 2.d. of Policy R01 (ii) as follows: Replace words 'internal highway links' with words 'movement corridors including' Replace word 'walking' with word 'pedestrian' Replace words 'bridle links' with words 'Public Rights of Way and passenger transport routes

Response:

Agree, amend policy as suggested to make policy effective.

Action:

Amend criterion 2.d. of Policy R01 (ii) as follows: Replace words 'internal highway links' with words 'movement corridors including' Replace word 'walking' with word 'pedestrian' Replace words 'bridle links' with words 'Public Rights of Way and passenger transport routes.

29653

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9581**Object**

Summary of representations:

Criteria A.2.g and A.2.i need to be combined to ensure that all sustainable travel links are identified, in line with paragraph 110 of the NPPF.

Summary of representation changes to plan:

Combine criteria 2.g and 2.i to read as follows: identify all pedestrian, cycling, Public Rights of Way and passenger transport links to existing networks, including to key destinations in Basildon to the east and to West Horndon Station;

Response:

Disagree, suggested modifications not considered to be necessary in order to make policy sound. Criteria are still effective set out separately.

Action:

None required

29579**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9584**Object**

Summary of representations:

Identifying the locations of infrastructure for sustainable transport within criterion A.2.j. will assist applicants and decision makers in assessing whether the full range of measures are catered for, in line with paragraph 110 of the NPPF.

Summary of representation changes to plan:

Replace criterion A.2.j. of Policy R01 (ii) with the following: 'j. identify the locations of the full range of sustainable transport measures, mobility hubs, and bus infrastructure

Response:

Disagree, suggested modifications not considered to be necessary in order to make policy sound. Wording considered effective as originally drafted.

Action:

None required

29654**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9586

Object

Summary of representations:

The wording in criterion A.2.I.iii. needs to be amended in order to ensure that all residents and businesses within the site allocation have access to a range of sustainable travel options within the site and beyond, in line with paragraphs 106, 110 and 112 of the NPPF.

Summary of representation changes to plan:

Replace criterion A.2.I.iii of Policy R01 (ii) with the following: 'occupiers have an appropriate range of active and sustainable travel options at their disposal, including access to passenger transport, cycle, and pedestrian links within the site, and links to West Horndon Station to the west, and Basildon to the east

Response:

Part agree, amend policy as suggested but exclude 'to the west' and 'to the east', as the relative locations of West Horndon and Basildon are known.

Action:

Replace criterion A.2.I.iii of Policy R01 (ii) with the following: 'occupiers have an appropriate range of active and sustainable travel options at their disposal, including access to passenger transport, cycle, and pedestrian links within the site, and links to West Horndon Station and Basildon.

29655

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9588

Object

Summary of representations:

Paragraph 73 c of NPPF requires strategic policy-making authorities ensure larger scale development provides "sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access.

Criterion A.2 does not currently refer to employment uses, this needs to be revised to ensure the Masterplan is underpinned by an Employment Strategy outlining the 'golden thread' from employment needs, to sectoral requirements and occupier needs, to employment land requirements, and employment floorspace requirements, in line with paragraph 82 of NPPF.

Summary of representation changes to plan:

Provide additional criteria under criterion A.2 to ensure the masterplan is underpinned by an Employment Strategy.

Response:

Disagree, suggested modification not considered appropriate to make policy sound. Would not be necessary as part of the masterplan. Part 7 of Policy R01 (ii) requires local employment to be considered. Other policies within the plan provide an overarching position in terms of employment delivery.

Action:

None required

29544

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9590

Object

Summary of representations:

In order to ensure the consistency with other parts of the policy and to ensure the criteria under A.3. are secured the word 'should' needs to be replaced with 'shall'.

Summary of representation changes to plan:

At the start of criterion 3 replace the word 'should' with 'shall'.

Response:

Disagree, suggested modification is not considered necessary to make policy sound.

Action:

None required

29580

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM85

9591

Object

Summary of representations:

Criterion A.3. needs to be amended to include reference to homeworking and flexible and adaptable business accommodation in line with paragraph 82 of the NPPF.

Summary of representation changes to plan:

Provide additional criteria under criterion A.3. to ensure development proposals provide for homeworking and flexible and adaptable business accommodation.

Response:

Disagree, suggested modification is not considered necessary to make policy sound. Issue to be dealt with in the SPD.

Action:

None required

29545

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9592

Object

Summary of representations:

As currently worded it is not clear to an applicant or decision maker what criterion A.3.d. is seeking to achieve, particularly with references to 'fine-grain' and street-based'.

The wording needs be amended to make it clear that the layout should prioritise movement by sustainable modes of transport. This would be in line with paragraph 110 of the NPPF.

Summary of representation changes to plan:

Replace criterion A.3.d. of Policy R01 (ii) with the following: 'combine to provide an appropriate range of densities across the site to ensure a layout that prioritises movement by sustainable modes of transport

Response:

Disagree, suggested modification is not considered necessary to make policy sound. Wording considered effective as originally drafted.

Action:

None required

29656

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9593**Object**

Summary of representations:

Reference to walking and cycling should be included in criterion A.3.e. as these forms of movement can utilise multi-functional green infrastructure. This would be in line with paragraph 110 of the NPPF.

Summary of representation changes to plan:

Insert the words 'walking and cycling,' between the words 'for' and 'leisure' in criterion A.3.e. of Policy R01 (ii).

Response:

Disagree, suggested modification is not considered necessary to make policy sound. Wording considered effective as originally drafted also would be represent repetition of part d of policy.

Action:

None required

29657**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9594**Object**

Summary of representations:

Clarity needs to be provided on what is meant in criterion A.3.f. by 'sympathetic transitions between the rural and urban environment' from a highways and transportation perspective.

Summary of representation changes to plan:

Provide clarity in the supporting text on what 'sympathetic transitions' are.

Response:

Disagree, suggested modification is not considered necessary to make policy sound.

Action:

None required

29546**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9595**Object**

Summary of representations:

Criterion A.3.i. needs to be amended to ensure that it applies to the full public rights of way (PRoW) network on site. This would be in line with paragraph 100 of the NPPF.

Summary of representation changes to plan:

Insert 's' at end of the word 'right' and insert the word 'network' after the word '(PRoW)'

Response:

Agree, amend policy as suggested to make policy effective.

Action:

Insert 's' at end of the word 'right' and insert the word 'network' after the word '(PRoW)'

29658**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9596**Object**

Summary of representations:

Criterion B.1. needs to be amended to reflect other parts of the DHGV policies, ensuring that the phasing and implementation plan is not just submitted but obtains approval.

Summary of representation changes to plan:

Insert the word 'approved' between the words 'the' and 'phasing' in criterion B.1. of Policy R01 (ii)

Response:

Disagree, suggested modification is not considered necessary to make policy sound. The phasing and implementation plan will only be approved at the planning application stage.

Action:

None required

29659**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9597**Object****Summary of representations:**

Criterion B.2. should provide flexibility for enhancement and expansion of a main mobility hub within the first phases of development not just the later phases, and subsidiary hubs to be provided within the local centres in the later phases of the development.

This would ensure that all residents and businesses within the site allocation have reasonable access to mobility hubs, in line with paragraph 112 of the NPPF. This would also ensure consistency with criterion 9 of Policy R01 (i) – MM84.

Summary of representation changes to plan:

Replace criterion B.2. of Policy R01 (ii) with the following: 'A mobility hub shall be delivered within the district centre prior to the first occupation of the development with provision for its enhancement and expansion throughout the first phase of development and during later phases, and subsidiary mobility hubs within the local centres in later phases, details of which shall be secured through a planning obligation.

Response:

Disagree, suggested modification is not considered necessary to make policy sound. Issue not previously been raised, wording considered effective as originally drafted.

Action:

None required

29660**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9598**Object****Summary of representations:**

ECC as the education authority, advises that the precise timings for when the education provision on site will be open cannot be determined at this stage. This will depend on the types of dwellings to be delivered and their pupil yield. This can only be determined at the planning application stage and the detail indicated in criterion B.3. is best secured through S106. This is standard practice for other large site where a school needs to be provided.

Accordingly, Criterion B.3. of Policy R01 (ii) needs to be deleted.

Summary of representation changes to plan:

Delete criterion B.3. from Policy R01 (ii)

Response:

Agree, amend policy as suggested to make policy justified. Timings for implementation of education provision will be determined through the planning application stage and secured through S106.

Action:

Delete criterion B.3. from Policy R01 (ii)

29547**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9599

Object

Summary of representations:

The policy in criterion B.5. should reference the full range of transport measures needed to ensure that all residents and businesses within the site allocation have access to sustainable travel options from the outset. This would be in line with paragraphs 106 and 112 of the NPPF.

Summary of representation changes to plan:

Amend criterion B.5. of Policy R01 (ii) as follows: Replace the word 'including' with the word 'and' Insert the wording ', local highway network, and the provision of pedestrian, cycle, PROW and passenger transport links to West Horndon station to the west and to the east towards key services and employment in Basildon.' after the word 'corridor'.

Response:

Part agree, amend policy as suggested but exclude 'to the west' and 'to the east', as the relative locations of West Horndon and Basildon are known.

Action:

Amend criterion B.5. of Policy R01 (ii) as follows: Replace the word 'including' with the word 'and' Insert the wording ', local highway network, and the provision of pedestrian, cycle, PROW and passenger transport links to West Horndon station and towards key services and employment in Basildon.' after the word 'corridor'.

29661

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9601

Object

Summary of representations:

The long term governance and stewardship arrangements in criterion B.6. need to include the movement routes and the mobility hubs as they are key parts of the infrastructure which will require management, maintenance and renewal, the same as green and blue infrastructure, the public realm, and community and other public facilities.

Summary of representation changes to plan:

Amend criterion B.6. of Policy R01 (ii) as follows: Insert the wording 'including all movement routes' between the words 'realm' and 'community' Insert the wording ', including the mobility hubs' between the words 'facilities' and 'Planning'

Response:

Disagree, suggested modification is not considered necessary to make policy sound. Consider that this would create duplication.

Action:

None required

29662

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9602**Object****Summary of representations:**

Paragraph 73 c of the NPPF requires that strategic policy-making authorities should ensure that larger scale development provides “sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access.

Criterion B. needs to be amended to include criteria to ensure that delivery of employment floorspace in each employment area is tied to occupation of housing, and to include an obligation to provide future-proofed broadband access for all homes and businesses (ideally, Fibre to the Premises).

Summary of representation changes to plan:

Provide additional criteria under criterion B. to ensure that delivery of employment floorspace in each employment area is tied to occupation of housing, and to include an obligation to provide future-proofed broadband access for all homes and businesses (ideally, Fibre to the Premises).

Response:

Disagree, suggested modification is not considered necessary to make policy sound. Considered unreasonable to tie occupation of housing to delivery of employment floorspace. Separate overarching policy BE10 Connecting new developments to digital infrastructure covers future proofing point.

Action:

None required

29548**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9603**Object****Summary of representations:**

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including reference to potential risk of flooding, and links to sustainable drainage and flood risk Local Plan policies, provides clarity to applicants/decisions makers of need for consideration of flooding matters at beginning of planning process.

Insert additional wording after para.9.40 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of NPPF.

Reflects ECC's Reg.19 Rep 22434 and Statement of Common Ground (F17D) position between BBC and ECC.

Summary of representation changes to plan:

Insert the following paragraph after paragraph 9.40 – The proposed development area is at potential risk of flooding from surface water as show on the EA's Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and where possible should try to have a positive impact on existing areas of flood risk downstream of the development. It should however be ensured that any development within this area complies with the requirements in Policy BE05 Sustainable Drainage and Policy NE09 Flood Risk.

Response:

Partly agree, insert first two sentences of paragraph as suggested to make consistent with other site policies and effective. Exclude final sentence as not considered necessary to cross reference to overarching policies. Plan can be read as a whole.

Action:

Insert the following paragraph after paragraph 9.40 – The proposed development area is at potential risk of flooding from surface water as show on the EA's Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and where possible should try to have a positive impact on existing areas of flood risk downstream of the development.

29581**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9604**Object****Summary of representations:**

Additional wording to be inserted into paragraph 9.43 to ensure consistency with paragraph 180 of the NPPF.

This reflects ECC's Reg.19 Rep 22441 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

Summary of representation changes to plan:

Amend paragraph 9.43 as follows: Insert the wording 'irreplaceable habitats such as ancient woodlands, veteran trees and fens' after the word 'retain'

Response:

Agree, amend policy as suggested to make paragraph consistent with national policy.

Action:

Amend paragraph 9.43 as follows: Insert the wording 'irreplaceable habitats such as ancient woodlands, veteran trees and fens' after the word 'retain'

29663

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9605

Object

Summary of representations:

In order to strengthen the supporting text in paragraph 9.82, in relation to employment and skills, reference to the adoption of Employment and Skills Plans should be referenced.

This reflects ECC's Reg.19 Rep 22443 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

Summary of representation changes to plan:

Insert additional sentence after the first sentence of paragraph 9.82 as follows – This could be achieved by adopting Employment and Skills Plans, through the planning process, which will require local developments, subject to meeting relevant thresholds, to obligate for activities such as apprenticeship opportunities, work experience placements as well as school and college outreach, particularly in construction but also at end-use. It will also factor contributions to support skills and employability for those hard to reach and furthest away from the job market.

Response:

Disagree, suggested modification is not considered necessary to make paragraph sound.

Action:

None required

29582

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9608**Object**

Summary of representations:

The majority of changes proposed by the Main Modifications amount to a re-ordering of previous text and re-wording to better reflect national planning policy wording, as opposed to a substantive change to policy. However, previously, the policy agreed with Natural England in the Statement of Common Ground (SoCG) sought to secure delivery of the following:

- (i) GI screening adjacent to A127, A128 and rail tracks
- (ii) A green infrastructure buffer / wedge on the eastern boundary

The new policy wording omits this detail and defers to the Dunton Hills SPD document (currently being updated) for detailed design matters.

Summary of representation changes to plan:

The new policy wording omits this detail and defers to the Dunton Hills SPD document (currently being updated) for detailed design matters. Therefore the above points should be added into the SPD as specific numbered points in the 'guidance' boxes on the appropriate pages.

Response:

Agree, points to be added to the SPD as suggested.

Action:

Add following details to DHGV SPD:

- (i) GI screening adjacent to A127, A128 and rail tracks
- (ii) A green infrastructure buffer / wedge on the eastern boundary

29851**Object**

Respondent: Natural England [216]

Agent: Natural England (Ms Anna Oliveri) [9119]

9612**Object**

Summary of representations:

CEG is generally supportive of the changes to the policy including the consolidation of former Policy R01(III). However, there are some further amendments that are required to ensure the policy is positively prepared, justified, and effective (NPPF, Paragraph 35). They will also aid clarity. These relate to how the garden village will come forward, especially in respect of the order of development.

Summary of representation changes to plan:

Amend part 2 h) to read: "h. show how development will safeguard, maintain and, where possible, enhance key views in and across the allocated site (to be identified in the Dunton Hills SPD)".;

Amend part 2 i) to read: Include a phasing and implementation plan which should secure the general order of development across the whole of the allocated site...";

Amend 3 (i) to read: "i) ensure the public rights of way (PRoW) are retained (or where required diverted), and enhanced".;

Amend B. 1. to read: "1. The development shall be delivered in general accordance with the phasing and implementation plan, specifically, the order of development".

Amend B. 2. to read: "2. a mobility hub (which can be a temporary facility) shall be delivered prior to the first occupation of the development..."

Amend B. 3. to read: "3. The first primary schools with early years provision shall be delivered within the first phase of development and opened at an appropriate time. Its opening and the delivery of the further primary schools and the secondary school to be determined in consultation with Essex County Council. Planning obligations will be sought to secure either the timely transfer of the land needed to accommodate the schools along with any necessary financial contributions towards educational provision or the delivery of the required schools by the developer".

Amend B. 4. a. to read: "a. off-site highway infrastructure improvements as may be necessary determined through the application(s) process in consultation with National Highways and Essex County Council; in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes) unless, in the case of the A127/128 junction, the applicant enters into a s.278 Agreement for its timely improvement, if more appropriate;

Amend B. 4. c. to read: "c. through the application process, proportionate contributions to the phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility will be agreed in line with anticipated demand generated by each phase the development; ..."

Amend B. 8. to read: "8. Proposals shall include a supporting statement that includes initiatives to ensure a proportion of that new construction jobs created are offered to local people, as far as may be reasonably possible."

Amend paragraph 9.45 to read: "Dunton Hall (Grade II listed building) off site"

Response:

Part 2(h) - Disagree, wording as originally drafted considered to be effective and sound.

Part 2(i) - Disagree, wording as originally drafted considered to be effective and sound.

Part 3 (i) Part agree, diversion of PRoW would be determined by the Local Highway Authority. Agree with replacement of word 'is' and change to 'are' reflecting plural nature of Prow in area. Agree with deletion of 'maintained', add in 'and/or enhanced'.

Part B. 1 - Part agree, accepted would be appropriate to include term general but change 'order' to 'sequence'

Part B. 2 - Disagree, not considered appropriate to insert this term. The appropriate scale and type of mobility can be determined through the course of an application.

Part B. 3 - Disagree, see ECC response to policy Part B. 3. Criterion proposed to be deleted. Matter expected to be dealt with through S106 discussions as part of planning application.

Part B. 4 (a) - Agree, amend policy as suggested to make policy effective.

Part B. 4. (c) - Agree, amend policy as suggested to make policy effective.

Part B. 8 - Disagree, changes not considered necessary to make policy sound. Criteria is intended to apply to all employment opportunities.

Paragraph 9.45 - Agree, amend paragraph as suggested to be effective. Represents factual update.

Action:

Amend 3 (i) to read: "i) ensure the public rights of way (PRoW) are retained (or where required diverted), and/or enhanced".;

Amend B. 1. to read: "1. The development shall be delivered in general accordance with the phasing and implementation plan, specifically, the sequence of development".

Amend B. 4. a. to read: "a. off-site highway infrastructure improvements as may be necessary determined through the application(s) process in consultation with National Highways and Essex County Council; in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes) unless, in the case of the A127/128 junction, the applicant enters into a s.278 Agreement for its timely improvement, if more appropriate;

Amend B. 4. c. to read: "c. through the application process, proportionate contributions to the phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility will be agreed in line with anticipated demand generated by each phase the development; ..."

Amend paragraph 9.45 to read: "Dunton Hall (Grade II listed building) off site"

30225**Object**

Respondent: CEG Land Promotions Limited [5050]

Agent: Lichfields (Ms Rachel Clements, Associate Director) [9145]

MM86

9617

Support

Summary of representations:

The proposed modification to criterion 3.c. of Policy R02 is consistent with the requirements of the NPPF.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29513

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9618

Object

Summary of representations:

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

Replace paragraph 9.97 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of the NPPF.

Reflects ECC's Reg.19 Rep 22445, position in Statement of Common Ground (F17D) between BBC and ECC, and position in ECC's Hearing Statement G7AN – paragraph 1.25.

Summary of representation changes to plan:

Replace paragraph 9.97 with the following wording: The site falls within both the Horndon Industrial Park (Ref. NBTW_HOR01) and West Horndon (Ref. NBTW_HOR02) CDA areas. The site is at potential risk of flooding from surface water as show on the EA's Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and where possible should try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.

Response:

Agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority.

Action:

Replace paragraph 9.97 with the following wording: The site falls within both the Horndon Industrial Park (Ref. NBTW_HOR01) and West Horndon (Ref. NBTW_HOR02) CDA areas. The site is at potential risk of flooding from surface water as show on the EA's Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and where possible should try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.

29583

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM87

9620

Support

Summary of representations:

The proposed modification to section 2(k) of Policy R03 directly respond to representations made by Sport England on the pre-submission version of the plan and the modification was subsequently agreed as part of the completed Statement of Common Ground with the Council. The modified policy is therefore supported as it would be considered to accord with Government policy in paragraph 99 of the NPPF (2021).

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29461

Support

Respondent: Sport England (Mr. Roy Warren, Planning Manager) [4294]

9622

Support

Summary of representations:

The proposed modification to criterion 3.c. of Policy R03 is consistent with the requirements of the NPPF.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29514

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9623

Support

Summary of representations:

ECC as highway and transportation authority has engaged with developers' transport consultants and is satisfied with access wording proposed in criterion 2.c. of Policy R03.

Furthermore, it's understood that a scheme could be designed to allow for partial vehicular access and partial pedestrian and cyclist access along Alexander Lane as part of any wider masterplanning of the site. ECC is satisfied with wording proposed in criterion 2.d. of Policy R03.

These modifications address ECC's Reg.19 Rep 22446 and reaffirms ECC's position in Statement of Common Ground (F17D) between BBC and ECC, and paragraph 1.9 of Hearing Statement G7AN.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29530

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9624

Support

Summary of representations:

The proposed deletion of the wording at the end of paragraph 9.100 ensures consistency with Policy BE13 Sustainable Means of Travel and Walkable Streets.

This modification addresses ECC's Reg.19 Rep 22448 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29531

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9626**Object****Summary of representations:**

Clarity is required for both applicants and decision makers in relation to the policy requirement criterion 4.b for 'quietway' cycle routes connecting transfer hubs.

As currently drafted the policy provides limited detail and the supporting text provides no guidance on what a 'quietway' cycle route is and their locations, or what a transfer hub is and their locations.

BBC should include appropriate wording within the supporting text to address this.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what 'quietway' cycle routes and transfer hubs are and their locations.

Response:

Disagree, not considered necessary to make policies sound. However, as an Additional Modification, the below definition of 'quietway' can be added to the glossary to provide clarity:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

Action:

Add following definition of 'quietway' to the glossary:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

29549**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9627

Object

Summary of representations:

ECC as the appropriate authority with responsibilities for education covering Brentwood Borough Council (BBC) has provided BBC with the education and childcare requirements (land size in hectares, use class allocation, and type of facility – Primary, Secondary, Early Years and Childcare) for this site allocation.

As currently drafted ECC is not satisfied that the wording proposed within criterion 1.b. will ensure that land for education purposes will be secured.

This reaffirms ECC's position in paragraph 1.5 of its Hearing Statement F127B.

Summary of representation changes to plan:

Replace criterion 1.b. of Policy R03 with the following – A new primary school with co-located early years and childcare nursery on 2.1 hectares of suitable land allocated for education and childcare use.

Response:

Disagree, suggested amendment is not considered necessary to make the policy sound. The original wording as suggested is clear and achieves the same result.

Action:

None required

29585

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9628

Object

Summary of representations:

ECC as highway and transportation authority welcomes the modification to criterion 2.e. which ensures consistency with paragraphs 106 and 107 of the NPPF.

A further modification is required to ensure the infrastructure to support the sustainable links are also considered and can be secured.

Summary of representation changes to plan:

Amend criterion 2.e of Policy R03 as follows: Insert the words 'infrastructure and' between the words ' transport' and 'services' Insert the words 'to connect' between the words 'services' and 'with'

Response:

Agree, amend policy as suggested to make effective.

Action:

Amend criterion 2.e of Policy R03 as follows: Insert the words 'infrastructure and' between the words ' transport' and 'services' Insert the words 'to connect' between the words 'services' and 'with'

29664

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9629

Object

Summary of representations:

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

ECC welcome modifications to paragraph 9.105 - ensures factual representation of current flooding position - in line with NPPF 159 and 160.

Recommend CDA reference number 'NBTW_002' included - consistency with other supporting text.

Reflects ECC's Reg.19 Rep 22449 and position in Hearing Statement G7AN – paragraph.1.13.

Summary of representation changes to plan:

Insert the wording '(Ref.NBTW_002)' between the words 'Shenfield' and 'CDA'.

Response:

Agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority.

Action:

Insert the wording '(Ref.NBTW_002)' between the words 'Shenfield' and 'CDA'.

29665

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9630

Object

Summary of representations:

Concerns regarding the provision of land for employment purposes within the allocation. The restriction of Uses identified at R03, 1(d) is not justified. The restriction to "light industrial, research and development (within Class E) or other sui generis employment uses which are compatible with the residential development", could limit opportunities for other employment-generating uses suitable for this location. Further, it would be illogical to suggest that sui generis employment generating uses are acceptable, but that employment-generating uses that fall into other categories are inherently unacceptable and should be restricted.

Summary of representation changes to plan:

It is our suggestion that the term "sui generis" is removed from the policy.

Response:

Disagree, this was discussed in the hearing sessions and suggested amendments are not necessary for soundness.

Action:

None required

29833

Object

Respondent: Countryside Properties [250]

Agent: Strutt & Parker LLP (Mr Richard Clews) [5526]

9631**Object****Summary of representations:**

In regard to self build, Policy HP01 now includes a caveat regarding the need for the provision to be demonstrated. This provision is absent from Policy R03, and should be included for consistency.

Summary of representation changes to plan:

The provision of self and custom build should be amended to be consistent with the wording of Policy HP01.

Response:

Disagree, the plan is to be read as a whole and therefore HP01 would apply. No changes required.

Action:

None required

29873**Object**

Respondent: Land North of Shenfield Developer Group [9122]

Agent: Barton Willmore (Ms Jane Piper) [9123]

9632**Object****Summary of representations:**

The provision of self and custom build should be amended to be consistent with the wording of Policy HP01. This refinement will prevent any ambiguity during the determination of planning applications on land at Policy R03. This approach has already been reflected in Policy R01, which requires 'self-build and custom build plots in line accordance with Policy HP01'.

Summary of representation changes to plan:

Seeking an amendment to Policy R03 part c to state as follows: 'self-build and custom build plots in line accordance with Policy HP01'

Response:

Disagree, the plan is to be read as a whole and therefore HP01 would apply. Proposed changes for Part 4, the Council's IDP illustrates what financial contributions are needed. No changes required

Action:

None required

29877**Object**

Respondent: Stonebond Properties Ltd [5948]

Agent: Phase 2 Planning and Development Ltd (Mr. Michael Calder, Associate) [3814]

9633

Object

Summary of representations:

Modifications would benefit from refinement to accord with policy MG05 (Developer Contributions) which relates requirements back to national policy and legal tests.

Summary of representation changes to plan:

Seeking an amendment to Policy R03 part 4 to state as follows: 'Applicants will also be required to make necessary financial contributions, where such contributions are compliant with national policy and the legal tests.

Response:

Disagree, the plan is to be read as a whole and therefore HP01 would apply. Proposed changes for Part 4, the Council's IDP illustrates what financial contributions are needed. No changes required

Action:

None required

29878

Object

Respondent: Stonebond Properties Ltd [5948]

Agent: Phase 2 Planning and Development Ltd (Mr. Michael Calder, Associate) [3814]

MM88

9634

Support

Summary of representations:

The proposed modification to criterion 3. of Policy R04 & R05 is consistent with the requirements of the NPPF.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29515

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9636**Object****Summary of representations:**

Clarity is required for both applicants and decision makers in relation to the policy requirement criterion 4.b. for 'quietway' cycle routes connecting transfer hubs.

As currently drafted the policy provides limited detail and the supporting text provides no guidance on what a 'quietway' cycle route is and their locations, or what a transfer hub is and their locations.

BBC should include appropriate wording within the supporting text to address this.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what 'quietway' cycle routes and transfer hubs are and their locations.

Response:

Disagree, not considered necessary to make policies sound. However, as a minor modification, the below definition of 'quietway' can be added to the glossary to provide clarity:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

Action:

Add following definition of 'quietway' to the glossary:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

29550**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9637**Object****Summary of representations:**

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

Replace paragraph 9.112 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of the NPPF.

Reflects ECC's Reg.19 Rep 22453, position in Statement of Common Ground (F17D) between BBC and ECC, and position in ECC's Hearing Statement G7AN – paragraph 1.18.

Summary of representation changes to plan:

Replace paragraph 9.112 with the following wording: The northern part of the site falls within the Thrift Green (Ref. NBTW_003) CDA. Any development within this area should where possible should try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed. The southern part of the proposed development area is not within an area identified as being at risk of flooding. It should however be ensured that any development within this area complies with the requirements in Policy BE05 Sustainable Drainage and Policy NE09 Flood Risk.

Response:

Part agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority. Do not accept suggested second paragraph as it adds unnecessary repetition and cross referencing.

Action:

Replace paragraph 9.112 with the following wording: The northern part of the site falls within the Thrift Green (Ref. NBTW_003) CDA. Any development within this area should where possible should try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed. The southern part of the proposed development area is not within an area identified as being at risk of flooding.

29586**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM89

9639

Support

Summary of representations:

The proposed modification to criterion 2. of Policy R06 is consistent with the requirements of the NPPF.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29516

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9640

Object

Summary of representations:

Clarity is required for both applicants and decision makers in relation to the policy requirement criterion 3.b. for 'quietway' cycle routes connecting transfer hubs.

As currently drafted the policy provides limited detail and the supporting text provides no guidance on what a 'quietway' cycle route is and their locations, or what a transfer hub is and their locations.

BBC should include appropriate wording within the supporting text to address this.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what 'quietway' cycle routes and transfer hubs are and their locations.

Response:

Disagree, not considered necessary to make policies sound. However, as a minor modification, the below definition of 'quietway' can be added to the glossary to provide clarity:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

Action:

Add following definition of 'quietway' to the glossary:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

29551

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9642**Object****Summary of representations:**

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

Replace paragraph 9.116 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of the NPPF.

Reflects ECC's Reg.19 Rep 22454, position in Statement of Common Ground (F17D) between BBC and ECC, and position in ECC's Hearing Statement G7AN – paragraph 1.4.

Summary of representation changes to plan:

Replace paragraph 9.116 with the following wording: The site falls partially within the Brentwood (Ref. NBTW_005) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. It should be ensured that any development within this area complies with the requirements in Policy BE05 Sustainable Drainage and Policy NE09 Flood Risk.

Response:

Part agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority. Do not accept suggested final sentence as it adds unnecessary repetition and cross referencing.

Action:

Replace paragraph 9.116 with the following wording: The site falls partially within the Brentwood (Ref. NBTW_005) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development.

29587**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9643

Object

Summary of representations:

- 2. Not Justified
- 3. Not Effective
- 4. Not Consistent with National Policy

ECC as highway and transportation authority welcomes inclusion of text within criterion 1.b identifying the Brentwood Cycle Action Plan.

In order to futureproof the policy and ensure that development provides the appropriate walking and cycling provision in the future, in line with paragraphs 92.c, 104 c, and 106d of NPPF, the supporting text should provide clarity on the types of other 'relevant evidence' which is referenced in the Policy. It should be made clear that such evidence should include details on future key destinations and attractors for walking and cycling connections.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to Policy R06 which provides clarity to applicants and decision makers on what is considered relevant evidence and matters it should include.

Response:

Disagree, suggested additional supporting text not considered necessary to make Policy sound. The consideration of relevant evidence would be addressed at the application stage.

Action:

None required

29666

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9644

Support

Summary of representations:

We support the Main Modifications to policy R06 (Land off Nags Head Lane, Brentwood). They clarify the policy expectations for the development of the site.

We also note the Appendix 1 Housing Trajectory (MM114) which identifies a delivery timetable between years 2022/3 and 2025/6 which we agree with.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

30266

Support

Respondent: Crest Nicholson [2509]

Agent: Bidwells (Mr. Steven Butler, Planner) [2089]

MM90

9646

Support

Summary of representations:

The proposed modification to criterion 2. of Policy R07 is consistent with the requirements of the NPPF.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29517

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9647

Object

Summary of representations:

Clarity is required for both applicants and decision makers in relation to the policy requirement criterion 3.b. for 'quietway' cycle routes connecting transfer hubs.

As currently drafted the policy provides limited detail and the supporting text provides no guidance on what a 'quietway' cycle route is and their locations, or what a transfer hub is and their locations.

BBC should include appropriate wording within the supporting text to address this.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what 'quietway' cycle routes and transfer hubs are and their locations.

Response:

Disagree, not considered necessary to make policies sound. However, as a minor modification, the below definition of 'quietway' can be added to the glossary to provide clarity:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

Action:

Add following definition of 'quietway' to the glossary:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

29552

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9648**Object****Summary of representations:**

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

Replace paragraph 9.121 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of the NPPF.

Reflects ECC's Reg.19 Rep 22455, position in Statement of Common Ground (F17D) between BBC and ECC, and position in ECC's Hearing Statement G7AN – paragraph 1.18.

Summary of representation changes to plan:

Replace paragraph 9.121 with the following wording: The site falls within the Pilgrims Hatch (Ref. NBTW_006) CDA and is at potential risk of flooding from surface water as show on the EA's Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and where possible should try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.

Response:

Agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority.

Action:

Replace paragraph 9.121 with the following wording: The site falls within the Pilgrims Hatch (Ref. NBTW_006) CDA and is at potential risk of flooding from surface water as show on the EA's Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and where possible should try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.

29588**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9650

Object

Summary of representations:

ECC as highway and transportation authority welcomes inclusion of text within criterion 1.b identifying the Brentwood Cycle Action Plan.

In order to futureproof the policy and ensure that development provides the appropriate walking and cycling provision in the future, in line with paragraphs 92.c, 104 c, and 106d of NPPF, the supporting text should provide clarity on the types of other 'relevant evidence' which is referenced in the Policy. It should be made clear that such evidence should include details on future key destinations and attractors for walking and cycling connections.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to Policy R07 which provides clarity to applicants and decision makers on what is considered relevant evidence and matters it should include.

Response:

Disagree, suggested additional supporting text not considered necessary to make Policy sound. The consideration of relevant evidence would be addressed at the application stage.

Action:

None required

29667

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9652

Object

Summary of representations:

Para. 9.117 is proposed to be amended to read "around 37 homes". This conflicts with the text of Policy R07. There needs to be consistency with the Policy wording and therefore this is an apparent error requiring correction in para. 9.117 to read as follows: "around 38 new homes". The delivery date may slip a year and the amendment should accordingly read "2022/2024".

Summary of representation changes to plan:

Clarification at the very least is needed on the number of homes. Para. 9.117 needs to be amended from "around 37 homes". There needs to be consistency with the Policy R07 wording. Therefore this apparent error requires correction to read as follows in para. 9.117: "around 38 new homes". The amendment of the delivery dates over three years, previously 2020 to 2022, proposed to be 2022/23 may still be possible, but the development of the allocation site can only be confidently commenced once the site allocation is confirmed in an adopted Local Plan. This may mean the delivery date may slip a year and the amendment should now read "2022/2024"

Response:

Dwelling numbers - Disagree, the number of dwellings set out in the policy is considered appropriate, also is prefixed with term 'around' as per all other site policies.

Trajectory - Disagree, the trajectory is still considered appropriate and in any case would not alter 5 year supply attributed to this site.

Action:

None required

29803

Object

Respondent: Sow & Grow Nursery (Mr. Derek Armiger) [303]

Agent: MR ALAN WIPPERMAN [8060]

29807

Object

Respondent: Ms Heather Dunbar [8337]

Agent: MR ALAN WIPPERMAN [8060]

29811

Object

Respondent: Sow & Grow Nursery (Ms Kim Armiger) [4657]

Agent: MR ALAN WIPPERMAN [8060]

29815

Object

Respondent: Ms Maxine Armiger [4656]

Agent: MR ALAN WIPPERMAN [8060]

9654**Object****Summary of representations:**

1b: The requirement to provide for good pedestrian and cycle connections is unclear when this requirement cannot be physically provided and installed on the allocated Site R07. The need for the requirement requires justification.

1c: Development at the allocation is very unlikely to cause harm to the asset or its setting. Accordingly is this criterion to the Policy justified? Further and clearer justification for this criterion to be part of a development principle of the allocation as drafted is required.

3b: reference to "quietway cycle routes connecting transfer hubs to schools in Brentwood Town Centre is not understood.

The requirement and justification for a financial contribution by this site in this location to the scheme routes described in the Cycle Plan is unclear.

Amended paragraph 9.120: The justification for this paragraph is unclear and needs to be made clear.

Summary of representation changes to plan:

It is for the Local Planning Authority to provide adequate justification for the policy criterion 1c and explanatory paragraphs referred to above regarding South Weald Historic Park and Garden and its significance and setting as a heritage asset. If the Inspectors are not satisfied then criterion 1c and explanatory paragraph 9.120 should be deleted. Criterion 1d on pedestrian and cycle connections and 3b infrastructure contributions for quietway cycle routes for this particular site. Without adequate justification by the local planning authority these should be deleted. With regard to Policy R07 and housing types and size, the deletion of "mixed size and type" should be re-inserted into the policy as it is consistent with the NPPF 2021.

Response:

Clause 1 (c) - Disagree, the inclusion of clause 1c is in line with advice from Historic England and considered sound.

Clause 1 (d) - Disagree, quietway cycle routes are part of the sustainable transport measure as identified in the Transport Assessment and the Infrastructure Delivery Plan to address the cumulative impacts of planned growth.

Housing types and size - Disagree, the term mixed size and type is proposed to be removed from all site policies as this will be determined by the overarching Strategic Policy HP01 Housing Mix.

Action:

None required

29805**Object**

Respondent: Sow & Grow Nursery (Mr. Derek Armiger) [303]

Agent: MR ALAN WIPPERMAN [8060]

29808**Object**

Respondent: Ms Heather Dunbar [8337]

Agent: MR ALAN WIPPERMAN [8060]

29812**Object**

Respondent: Sow & Grow Nursery (Ms Kim Armiger) [4657]

Agent: MR ALAN WIPPERMAN [8060]

29817

Object

Respondent: Ms Maxine Armiger [4656]

Agent: MR ALAN WIPPERMAN [8060]

MM91

9655

Support

Summary of representations:

■ The proposed modification to criterion 2. of Policy R08 is consistent with the requirements of the NPPF.

Summary of representation changes to plan:

■ None required

Response:

■ Noted

Action:

■ None required

29518

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9657

Object

Summary of representations:

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

Replace Paragraph 9.125 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of NPPF.

This reflects ECC's Reg.19 Rep 22456, position in Statement of Common Ground (F17D) between BBC and ECC, and position in ECC's Hearing Statement G7AN – paragraph 1.18.

Summary of representation changes to plan:

Replace paragraph 9.125 with the following wording: 'The site falls within the Brentwood (Ref. NBTW_005) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.'

Response:

Agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority.

Action:

Replace paragraph 9.125 with the following wording: 'The site falls within the Brentwood (Ref. NBTW_005) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.'

29682

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM92

9658

Support

Summary of representations:

The proposed modification to criterion 2. of Policy R09 is consistent with the requirements of the NPPF.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29519

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9661**Object****Summary of representations:**

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

Replace Paragraph 9.130 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of NPPF.

This reflects ECC's Reg.19 Rep 22457, position in Statement of Common Ground (F17D) between BBC and ECC, and position in ECC's Hearing Statement G7AN – paragraph 1.18.

Summary of representation changes to plan:

Replace paragraph 9.130 with the following wording: 'The site falls within the Brentwood (Ref. NBTW_005) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.'

Response:

Agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority.

Action:

None required

29683**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9662

Object

Summary of representations:

Clarity is required for both applicants and decision makers in relation to the policy requirement criterion 3.b. for 'quietway' cycle routes connecting transfer hubs.

As currently drafted the policy provides limited detail and the supporting text provides no guidance on what a 'quietway' cycle route is and their locations, or what a transfer hub is and their locations.

BBC should include appropriate wording within the supporting text to address this.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what 'quietway' cycle routes and transfer hubs are and their locations.

Response:

Disagree, not considered necessary to make policies sound. However, as a minor modification, the below definition of 'quietway' can be added to the glossary to provide clarity:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

Action:

Add following definition of 'quietway' to the glossary:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

29553

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9664

Support

Summary of representations:

Support the Main Modifications to policy R09 (Land off Warley Hill, Warley). They clarify the policy expectations for the development of the site.

We also note the Appendix 1 Housing Trajectory (MM114) which identifies a delivery timetable between years 2022/3 and 2023/4, which we agree with.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

30265

Support

Respondent: Essex Partnership University NHS Foundation Trust [8344]

Agent: Bidwells (Mr. Steven Butler, Planner) [2089]

MM93

9665

Support

Summary of representations:

The proposed modification to criterion 2. of Policy R10 is consistent with the requirements of the NPPF.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29520

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9667

Support

Summary of representations:

The increase in site capacity from 100 to 200 homes which is in line with the NPPF para 103 is supported. - The proposed amendments to part d of the policy allows increased flexibility and is therefore supported by TfL Commercial Development (CD). - TfL CD supports the amendment to the boundary of the site allocation R10 Brentwood Railway Station Car Park.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

30045

Support

Respondent: TfL Commercial Development [8311]

Agent: TfL Commercial Development (Mr Daniel Fleet, Assistant Planner) [9143]

9668

Object

Summary of representations:

Clarity is required for both applicants and decision makers in relation to the policy requirement criterion 3.b. for 'quietway' cycle routes connecting transfer hubs.

As currently drafted the policy provides limited detail and the supporting text provides no guidance on what a 'quietway' cycle route is and their locations, or what a transfer hub is and their locations.

BBC should include appropriate wording within the supporting text to address this.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what 'quietway' cycle routes and transfer hubs are and their locations

Response:

Disagree, not considered necessary to make policies sound. However, as a minor modification, the below definition of 'quietway' can be added to the glossary to provide clarity:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

Action:

Add following definition of 'quietway' to the glossary:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

29554

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9669

Object

Summary of representations:

Criterion 1.d. of Policy R10 seeks to ensure that the parking on site is sufficient to meet the existing and future rail traveller needs. BCC should be satisfied that this can be achieved and does not conflict with other policies in the Local Plan, such as BE13 Sustainable Means of Travel and Walkable Streets and BE17 Parking Standards.

This reflects ECC's Reg.19 Rep 22464.

Summary of representation changes to plan:

BBC should be satisfied that the requirement of criterion 1.d. can be achieved and does not conflict with the other policies in the Local Plan.

Response:

The Council is satisfied that this the policy requirements for R10 are in conformity with other policies in the Local Plan as this is concerned with the management of existing parking provision alongside the future development of the site.

Action:

None required

29562

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9670

Object

Summary of representations:

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

Replace paragraph 9.136 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of the NPPF.

Reflects ECC's Reg.19 Rep 22469, position in Statement of Common Ground (F17D) between BBC and ECC, and position in ECC's Hearing Statement G7AN – paragraph 1.4.

Summary of representation changes to plan:

Replace paragraphs 9.136 with the following wording: The site falls within the Brentwood (Ref. NBTW_005) CDA and is at potential risk of flooding from surface water as show on the EAs Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and where possible should try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.

Response:

Agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority.

Action:

Replace paragraphs 9.136 with the following wording: The site falls within the Brentwood (Ref. NBTW_005) CDA and is at potential risk of flooding from surface water as show on the EAs Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and where possible should try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.

29589

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9671**Object****Summary of representations:**

ECC as highway and transportation authority welcomes inclusion of text within criterion 1.b identifying the Brentwood Cycle Action Plan.

In order to futureproof the policy and ensure that development provides the appropriate walking and cycling provision in the future, in line with paragraphs 92.c, 104 c, and 106d of NPPF, the supporting text should provide clarity on the types of other 'relevant evidence' which is referenced in the Policy. It should be made clear that such evidence should include details on future key destinations and attractors for walking and cycling connections.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to Policy R10 which provides clarity to applicants and decision makers on what is considered relevant evidence and matters it should include.

Response:

Disagree, suggested additional supporting text not considered necessary to make Policy sound. The consideration of relevant evidence would be addressed at the application stage.

Action:

None required

29668**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9672**Object****Summary of representations:**

Concerns regarding additional car parking demand generated by development, also impact on air quality, flooding, school and doctor capacity.

Summary of representation changes to plan:

Address flood risk, air quality checked needed pre and post development and clarify infrastructure investments.

Response:

Strategic Flood Risk Assessment carried out and statutory bodies (Environment Agency and Essex County Council as Lead Local Flood Authority) have been consulted and raised no objections. Air Quality Impact Assessment undertaken for plan which concluded no overall negative impact. Necessary infrastructure identified in Infrastructure Delivery Plan. Matters will be considered in further detail at planning application stage.

Action:

None required

29727**Object**

Respondent: Ms Barbara Connelly [9104]

MM94

9674

Support

Summary of representations:

The proposed modification to criterion 2. of Policy R11 is consistent with the requirements of the NPPF.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29521

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9675

Object

Summary of representations:

Clarity is required for both applicants and decision makers in relation to the policy requirement criterion 3.b. for 'quietway' cycle routes connecting transfer hubs.

As currently drafted the policy provides limited detail and the supporting text provides no guidance on what a 'quietway' cycle route is and their locations, or what a transfer hub is and their locations.

BBC should include appropriate wording within the supporting text to address this.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what 'quietway' cycle routes and transfer hubs are and their locations.

Response:

Disagree, not considered necessary to make policies sound. However, as a minor modification, the below definition of 'quietway' can be added to the glossary to provide clarity:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

Action:

Add following definition of 'quietway' to the glossary:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

29555

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9676

Object

Summary of representations:

Criterion 1.f. of Policy R11 seeks to ensure retention of public parking spaces sufficient to meet overall town centre public parking needs. BBC should be satisfied that this can be achieved and does not conflict with other policies in the Local Plan, such as BE13 Sustainable Means of Travel and Walkable Streets and BE17 Parking Standards.

This reflects ECC's Reg.19 Rep 22466.

Summary of representation changes to plan:

BBC should be satisfied that this requirement of criterion 1.f, 1.g. can be achieved and does not conflict with the other policies in the Local Plan.

Response:

Noted, the Council is satisfied that this the policy requirements for R11, R13 and R14 are in conformity with other policies in the Local Plan as this is concerned with the management of existing parking provision alongside the future development of the sites.

Action:

None required

29563

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9677

Object

Summary of representations:

ECC as highway and transportation authority welcomes inclusion of text within criterion 1.c. identifying the Brentwood Cycle Action Plan.

In order to futureproof the policy and ensure that development provides the appropriate walking and cycling provision in the future, in line with NPPF paragraphs 92.c, 104 c and 106 d, the supporting text should provide clarity on the types of other 'relevant evidence' which is referenced in the Policy. It should be made clear that such evidence should include details on future key destinations and attractors for walking and cycling connections.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to Policy R11 which provides clarity to applicants and decision makers on what is considered relevant evidence and matters it should include.

Response:

Disagree, suggested additional supporting text not considered necessary to make Policy sound. The consideration of relevant evidence would be addressed at the application stage.

Action:

None required

29672

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9678

Object

Summary of representations:

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

Replace Paragraph 9.141 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of NPPF.

This reflects ECC's Reg.19 Rep 22458, position in Statement of Common Ground (F17D) between BBC and ECC, and position in ECC's Hearing Statement G7AN – paragraph 1.4.

Summary of representation changes to plan:

Replace paragraph 9.141 with the following wording: 'The site falls within the Brentwood (Ref. NBTW_005) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.'

Response:

Agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority.

Action:

Replace paragraph 9.141 with the following wording: 'The site falls within the Brentwood (Ref. NBTW_005) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.'

29684

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9679

Object

Summary of representations:

The changes a) contradicted with the commitment in the Plan as originally submitted to retain the existing level of public parking spaces. b) presented a commitment to deliver a currently unknown level of parking on-site. This could not possibly allay prior concerns about deliverability, and cannot be proven sound by any means. And this is all despite the fact that the level of Town Centre parking needs is a crucial factor in the viability of the borough's main shopping centre, and its economy. BBC policies should be aligning the economic needs of Brentwood businesses and the Council's finances and policy.

Summary of representation changes to plan:

A restoration of the submitted Plan's commitment to maintain the existing level of parking spaces across sites R11, R13 and R14 would represent a known figure, and should, therefore, be deliverable and sound, in design and policy terms.

Response:

Disagree, policy wording provides for the appropriate consideration of parking provision at the application stage.

Action:

None required

30250

Object

Respondent: Mr Philip Mynott [8283]

MM95

9681

Support

Summary of representations:

The proposed modification to criterion 2. of Policy R12 is consistent with the requirements of the NPPF.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29522

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9683

Object

Summary of representations:

Clarity is required for both applicants and decision makers in relation to the policy requirement criterion 3.b. for 'quietway' cycle routes connecting transfer hubs.

As currently drafted the policy provides limited detail and the supporting text provides no guidance on what a 'quietway' cycle route is and their locations, or what a transfer hub is and their locations.

BBC should include appropriate wording within the supporting text to address this.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what 'quietway' cycle routes and transfer hubs are and their locations.

Response:

Disagree, not considered necessary to make policies sound. However, as a minor modification, the below definition of 'quietway' can be added to the glossary to provide clarity:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

Action:

Add following definition of 'quietway' to the glossary:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

29556

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9684

Object

Summary of representations:

ECC as highway and transportation authority welcomes inclusion of text within criterion 1.b identifying the Brentwood Cycle Action Plan.

In order to futureproof the policy and ensure that development provides the appropriate walking and cycling provision in the future, in line with paragraphs 92.c, 104 c, and 106d of NPPF, the supporting text should provide clarity on the types of other 'relevant evidence' which is referenced in the Policy. It should be made clear that such evidence should include details on future key destinations and attractors for walking and cycling connections.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to Policy R12 which provides clarity to applicants and decision makers on what is considered relevant evidence and matters it should include.

Response:

Disagree, suggested additional supporting text not considered necessary to make Policy sound. The consideration of relevant evidence would be addressed at the application stage.

Action:

None required

29669

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9685

Object

Summary of representations:

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

Replace Paragraph 9.145 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of NPPF.

This reflects ECC's Reg.19 Rep 22459, position in Statement of Common Ground (F17D) between BBC and ECC, and position in ECC's Hearing Statement G7AN – paragraph 1.4.

Summary of representation changes to plan:

Replace paragraph 9.145 with the following wording: 'The site falls within the Brentwood (Ref. NBTW_005) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.'

Response:

Agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority.

Action:

Replace paragraph 9.145 with the following wording: 'The site falls within the Brentwood (Ref. NBTW_005) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.'

29685

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM96

9686

Support

Summary of representations:

The proposed modification to criterion 2. of Policy R13 is consistent with the requirements of the NPPF.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29523

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9687

Object

Summary of representations:

Clarity is required for both applicants and decision makers in relation to the policy requirement criterion 3.b. for 'quietway' cycle routes connecting transfer hubs.

As currently drafted the policy provides limited detail and the supporting text provides no guidance on what a 'quietway' cycle route is and their locations, or what a transfer hub is and their locations.

BBC should include appropriate wording within the supporting text to address this.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what 'quietway' cycle routes and transfer hubs are and their locations.

Response:

Disagree, not considered necessary to make policies sound. However, as a minor modification, the below definition of 'quietway' can be added to the glossary to provide clarity:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

Action:

Add following definition of 'quietway' to the glossary:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

29557

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9688

Object

Summary of representations:

Criterion 1.f. of Policy R13 seeks to ensure retention of public parking spaces sufficient to meet overall town centre public parking needs. BCC should be satisfied that this can be achieved and does not conflict with other policies in the Local Plan, such as BE13 Sustainable Means of Travel and Walkable Streets and BE17 Parking Standards.

This reflects ECC's Reg.19 Rep 22467.

Summary of representation changes to plan:

BBC should be satisfied that this requirement of criterion 1.f. can be achieved and does not conflict with the other policies in the Local Plan.

Response:

Noted, the Council is satisfied that this the policy requirements for R11, R13 and R14 are in conformity with other policies in the Local Plan as this is concerned with the management of existing parking provision alongside the future development of the sites.

Action:

None required.

29564

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9689

Object

Summary of representations:

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

Replace Paragraph 9.149 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of NPPF.

This reflects ECC's Reg.19 Rep 22461, position in Statement of Common Ground (F17D) between BBC and ECC, and position in ECC's Hearing Statement G7AN – paragraph 1.4.

Summary of representation changes to plan:

Replace paragraph 9.149 with the following wording: 'The site falls within the Brentwood (Ref. NBTW_005) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.'

Response:

Agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority.

Action:

Replace paragraph 9.149 with the following wording: 'The site falls within the Brentwood (Ref. NBTW_005) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.'

29686

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9690

Object

Summary of representations:

The changes a) contradicted with the commitment in the Plan as originally submitted to retain the existing level of public parking spaces. b) presented a commitment to deliver a currently unknown level of parking on-site. This could not possibly allay prior concerns about deliverability, and cannot be proven sound by any means. And this is all despite the fact that the level of Town Centre parking needs is a crucial factor in the viability of the borough's main shopping centre, and its economy. BBC policies should be aligning the economic needs of Brentwood businesses and the Council's finances and policy.

Summary of representation changes to plan:

A restoration of the submitted Plan's commitment to maintain the existing level of parking spaces across sites R11, R13 and R14 would represent a known figure, and should, therefore, be deliverable and sound, in design and policy terms.

Response:

Disagree, policy wording provides for the appropriate consideration of parking provision at the application stage.

Action:

None required

30406

Object

Respondent: Mr Philip Mynott [8283]

MM97

9691

Support

Summary of representations:

The proposed modification to criterion 3. of Policy R14 is consistent with the requirements of the NPPF

Summary of representation changes to plan:

None required

Response:

Note

Action:

None required

29524

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9693**Object****Summary of representations:**

Clarity is required for both applicants and decision makers in relation to the policy requirement criterion 4.b. for 'quietway' cycle routes connecting transfer hubs.

As currently drafted the policy provides limited detail and the supporting text provides no guidance on what a 'quietway' cycle route is and their locations, or what a transfer hub is and their locations.

BBC should include appropriate wording within the supporting text to address this.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what 'quietway' cycle routes and transfer hubs are and their locations.

Response:

Disagree, not considered necessary to make policies sound. However, as a minor modification, the below definition of 'quietway' can be added to the glossary to provide clarity:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

Action:

Add following definition of 'quietway' to the glossary:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

29558**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9694**Object****Summary of representations:**

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

Replace Paragraph 9.153 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of NPPF.

This reflects ECC's Reg.19 Rep 22462, position in Statement of Common Ground (F17D) between BBC and ECC, and position in ECC's Hearing Statement G7AN – paragraph 1.4.

Summary of representation changes to plan:

Replace paragraph 9.153 with the following wording: 'The site falls within the Brentwood (Ref. NBTW_005) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.'

Response:

Agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority.

Action:

Replace paragraph 9.153 with the following wording: 'The site falls within the Brentwood (Ref. NBTW_005) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.'

29687**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9695**Object****Summary of representations:**

Criterion 2.g. of Policy R14 seek to ensure retention of public parking spaces sufficient to meet overall town centre public parking needs. BBC should be satisfied that this can be achieved and does not conflict with other policies in the Local Plan, such as BE13 Sustainable Means of Travel and Walkable Streets and BE17 Parking Standards.

This reflects ECC's Reg.19 Rep 22468.

Summary of representation changes to plan:

BBC should be satisfied that this requirement of criterion 2.g. can be achieved and does not conflict with the other policies in the Local Plan.

Response:

Noted, the Council is satisfied that this the policy requirements for R11, R13 and R14 are in conformity with other policies in the Local Plan as this is concerned with the management of existing parking provision alongside the future development of the sites.

Action:

None required

29565**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9696**Object****Summary of representations:**

ECC as highway and transportation authority welcomes inclusion of text within criterion 2.d. identifying the Brentwood Cycle Action Plan.

In order to futureproof the policy and ensure that development provides the appropriate walking and cycling provision in the future, in line with NPPF paragraphs 92.c, 104 c and 106 d, the supporting text should provide clarity on the types of other 'relevant evidence' which is referenced in the Policy. It should be made clear that such evidence should include details on future key destinations and attractors for walking and cycling connections.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to Policy R14 which provides clarity to applicants and decision makers on what is considered relevant evidence and matters it should include.

Response:

Disagree, suggested additional supporting text not considered necessary to make Policy sound. The consideration of relevant evidence would be addressed at the application stage.

Action:

None required

29677**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9698**Object**

Summary of representations:

The changes a) contradicted with the commitment in the Plan as originally submitted to retain the existing level of public parking spaces. b) presented a commitment to deliver a currently unknown level of parking on-site. This could not possibly allay prior concerns about deliverability, and cannot be proven sound by any means. And this is all despite the fact that the level of Town Centre parking needs is a crucial factor in the viability of the borough's main shopping centre, and its economy. BBC policies should be aligning the economic needs of Brentwood businesses and the Council's finances and policy.

Summary of representation changes to plan:

A restoration of the submitted Plan's commitment to maintain the existing level of parking spaces across sites R11, R13 and R14 would represent a known figure, and should, therefore, be deliverable and sound, in design and policy terms.

Response:

Disagree, policy wording provides for the appropriate consideration of parking provision at the application stage.

Action:

None required

30408**Object**

Respondent: Mr Philip Mynott [8283]

9699**Object**

Summary of representations:

Area will be densely populated. Not at all reflective of the community.

Summary of representation changes to plan:

Covid and shift in behaviour needs to be considered in these plans as things have changed since these proposals were put in place.

Response:

Selection of site is consistent with spatial strategy, represents a brownfield development in a sustainable location. Further detailed consideration of the site design and layout will be considered at the planning application stage.

Action:

None required

29731**Object**

Respondent: Gita Mackintosh [7214]

MM98

9700

Support

Summary of representations:

The proposed modification to criterion 3. of Policy R15 is consistent with the requirements of the NPPF.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29525

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9701

Object

Summary of representations:

Clarity is required for both applicants and decision makers in relation to the policy requirement criterion 4.b. for 'quietway' cycle routes connecting transfer hubs.

As currently drafted the policy provides limited detail and the supporting text provides no guidance on what a 'quietway' cycle route is and their locations, or what a transfer hub is and their locations.

BBC should include appropriate wording within the supporting text to address this.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what 'quietway' cycle routes and transfer hubs are and their locations.

Response:

Disagree, not considered necessary to make policies sound. However, as a minor modification, the below definition of 'quietway' can be added to the glossary to provide clarity:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

Action:

Add following definition of 'quietway' to the glossary:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

29559

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9702**Object****Summary of representations:**

ECC as highway and transportation authority welcomes inclusion of text within criterion 2.c. identifying the Brentwood Cycle Action Plan.

In order to futureproof the policy and ensure that development provides the appropriate walking and cycling provision in the future, in line with NPPF paragraphs 92.c, 104 c and 106 d, the supporting text should provide clarity on the types of other 'relevant evidence' which is referenced in the Policy. It should be made clear that such evidence should include details on future key destinations and attractors for walking and cycling connections.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to Policy R15 which provides clarity to applicants and decision makers on what is considered relevant evidence and matters it should include.

Response:

Disagree, suggested additional supporting text not considered necessary to make Policy sound. The consideration of relevant evidence would be addressed at the application stage.

Action:

None required

29676**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9703

Object

Summary of representations:

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

Replace Paragraph 9.159 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of NPPF.

This reflects ECC's Reg.19 Rep 22463, position in Statement of Common Ground (F17D) between BBC and ECC, and position in ECC's Hearing Statement G7AN – paragraph 1.4.

Summary of representation changes to plan:

Replace paragraph 9.159 with the following wording: 'The site falls within the Brentwood (Ref. NBTW_005) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.'

Response:

Agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority.

Action:

Replace paragraph 9.159 with the following wording: 'The site falls within the Brentwood (Ref. NBTW_005) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.'

29688

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9704

Object

Summary of representations:

Infrastructure is not in place and plans it offset traffic is not representative at all.

Summary of representation changes to plan:

Proper projection figures to understand volume of traffic and how it can be properly managed.

Response:

Infrastructure Delivery Plan identifies necessary infrastructure to mitigate local plan growth which was informed by the Local Plan Transport Assessment.

Action:

None required

29732

Object

Respondent: Gita Mackintosh [7214]

MM99

9705

Support

Summary of representations:

The proposed modification to criterion 2. of Policy R16 & R17 is consistent with the requirements of the NPPF.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29526

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9706

Object

Summary of representations:

Clarity is required for both applicants and decision makers in relation to the policy requirement criterion 3.b. for 'quietway' cycle routes connecting transfer hubs.

As currently drafted the policy provides limited detail and the supporting text provides no guidance on what a 'quietway' cycle route is and their locations, or what a transfer hub is and their locations.

BBC should include appropriate wording within the supporting text to address this.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what 'quietway' cycle routes and transfer hubs are and their locations.

Response:

Disagree, not considered necessary to make policies sound. However, as a minor modification, the below definition of 'quietway' can be added to the glossary to provide clarity:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

Action:

Add following definition of 'quietway' to the glossary:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

29560

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9707**Object****Summary of representations:**

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

Replace paragraph 9.164 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of the NPPF.

Reflects ECC's Reg.19 Rep 22473, position in Statement of Common Ground (F17D) between BBC and ECC, and position in ECC's Hearing Statement G7AN – paragraph 1.18.

Summary of representation changes to plan:

Replace paragraph 9.164 with the following wording: The site falls within the Pilgrims Hatch (Ref. NBTW_006) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.

Response:

Agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority.

Action:

Replace paragraph 9.164 with the following wording: The site falls within the Pilgrims Hatch (Ref. NBTW_006) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.

29590**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9708**Object****Summary of representations:**

ECC as highway and transportation authority welcomes inclusion of text within criterion 1.c. identifying the Brentwood Cycle Action Plan.

In order to futureproof the policy and ensure that development provides the appropriate walking and cycling provision in the future, in line with NPPF paragraphs 92.c, 104 c and 106 d, the supporting text should provide clarity on the types of other 'relevant evidence' which is referenced in the Policy. It should be made clear that such evidence should include details on future key destinations and attractors for walking and cycling connections.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to Policy R16 & R17 which provides clarity to applicants and decision makers on what is considered relevant evidence and matters it should include.

Response:

Disagree, suggested additional supporting text not considered necessary to make Policy sound. The consideration of relevant evidence would be addressed at the application stage.

Action:

None required

29673**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9709**Object****Summary of representations:**

Concerned that the amendments to Policy R16; 1(a) do not fully reflect the concerns raised and discussed in some detail thorough the examination sessions in respect of the access to the Site. There is a need for greater flexibility on the access options for the site in order to ensure deliverability. Given the need for the policy to be effective and to contain a degree of flexibility (as there are no policy or technical reasons to require access solely from Doddinghurst Road), alternative wording is recommended.

Summary of representation changes to plan:

Recommend the following amendment: 'Proposals should a. Provide vehicular access via Doddinghurst Road, Karen Close or Russell Close;'

Response:

Disagree, this was originally set out for access via Doddinghurst Road based on advice from the Local Highway Authority. The merits of alternative access points can be put forward as part of any planning application and are not specifically excluded.

Action:

None required

29865**Object**

Respondent: Countryside Properties [250]

Agent: Strutt & Parker LLP (Mr Richard Clews) [5526]

9710**Object**

Summary of representations:

Drainage issues. Heavy rainfall recently meant current drains unable to cope in Russell Close. Also, sewerage drains were struggling during lockdown and Anglia Water was called. Removal of trees on site will impact drainage.

Summary of representation changes to plan:

Drainage issues. Please remain as before. ... ie) 'This development has the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue

Response:

The policy identifies that where necessary appropriate mitigation will need to be implemented which will be determined through the planning application process in consultation with Essex County Council as Lead Local Flood Authority.

Action:

None required

29707**Object**

Respondent: Mrs Angela Kay [5920]

9711**Object**

Summary of representations:

Strongly disagree with this proposal. There is no proper numbers to show the full impact of these homes i.e. volume of traffic and school places. Also what is the appetite for people wanting to live so close to a motorway? What about health considerations too breathing in car fumes.

Summary of representation changes to plan:

Projected numbers to understand full impact to roads, schools and environment.

Response:

The Infrastructure Delivery Plan identifies necessary infrastructure required as a result of proposals within the Local Plan. Further detailed information will be required at the planning application stage to demonstrate the proposal is acceptable in respect of its potential impacts.

Action:

None required

29733**Object**

Respondent: Gita Mackintosh [7214]

MM101

9722

Support

Summary of representations:

The inclusion of the additional wording to paragraph 9.175 in relation to the Endeavour School ensures that the full range of education provision is identified and considered.

This modification addresses ECC's Reg.19 Rep 22476 and the position in the Statement of Common Ground (F17D) between BBC and ECC.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29532

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9723

Support

Summary of representations:

The proposed modification to criterion 2. of Policy R19 is consistent with the requirements of the NPPF.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29527

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9724**Support****Summary of representations:**

The modified policy is supported as it would be considered to accord with Government policy in paragraph 99 of the NPPF (2021).

A minor drafting error in the new paragraph that follows paragraph 9.175 has been identified which requires addressing before the plan is adopted.

Summary of representation changes to plan:

None required

Response:

Noted, drafting error, which comprised a minor typo, to be changed prior to adoption.

Action:

Correct minor typo as part of Additional Modifications.

29462**Support**

Respondent: Sport England (Mr. Roy Warren, Planning Manager) [4294]

9725**Support****Summary of representations:**

The upward revision to 75 dwellings is welcomed and better reflects the NPPF requirement to make efficient use of land although our previous response on F78 demonstrated how greater provision can be achieved while continuing to reflect local character.

1(e) and Para.9.175 - Any financial contribution being sought should be proportionate to the historic provision which was as a single playing pitch. The Council have not provided details of how such a contribution is calculated.

Summary of representation changes to plan:

1 (e) and Para 9.175 any financial contribution being sought should be proportionate to the historic provision which was as a single playing pitch. The Council have not provided details of how such a contribution is calculated.

Response:

Disagree, the calculation for financial contributions can be found within the Council's Infrastructure Delivery Plan (IDP). Sports England are in support of a financial contribution to be made.

Action:

None required

29735**Support**

Respondent: The Ursuline Sisters Brentwood CIO [9107]

Agent: JTS Partnership LLP (Mr. James Govier) [2587]

9794**Object****Summary of representations:**

ECC as highway and transportation authority welcomes inclusion of text within criterion 1.c. identifying the Brentwood Cycle Action Plan.

In order to futureproof the policy and ensure that development provides the appropriate walking and cycling provision in the future, in line with NPPF paragraphs 92.c, 104 c and 106 d, the supporting text should provide clarity on the types of other 'relevant evidence' which is referenced in the Policy. It should be made clear that such evidence should include details on future key destinations and attractors for walking and cycling connections.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to Policy R19 which provides clarity to applicants and decision makers on what is considered relevant evidence and matters it should include.

Response:

Disagree, suggested additional supporting text not considered necessary to make Policy sound. The consideration of relevant evidence would be addressed at the application stage.

Action:

None required

29674**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9795**Object****Summary of representations:**

Clarity is required for both applicants and decision makers in relation to the policy requirement criterion 3.b. for 'quietway' cycle routes connecting transfer hubs.

As currently drafted the policy provides limited detail and the supporting text provides no guidance on what a 'quietway' cycle route is and their locations, or what a transfer hub is and their locations.

BBC should include appropriate wording within the supporting text to address this.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what 'quietway' cycle routes and transfer hubs are and their locations.

Response:

Disagree, not considered necessary to make policies sound. However, as a minor modification, the below definition of 'quietway' can be added to the glossary to provide clarity:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

Action:

Add following definition of 'quietway' to the glossary:

"Quietway' cycle route: Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.

29561**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9797**Object****Summary of representations:**

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

Replace paragraph 9.176 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of the NPPF.

Reflects ECC's Reg.19 Rep 22477, position in Statement of Common Ground (F17D) between BBC and ECC, and position in ECC's Hearing Statement G7AN – paragraph 1.13.

Summary of representation changes to plan:

Replace paragraph 9.176 with the following wording: The site falls within both the Shenfield (Ref. NBTW_002) and Brentwood (Ref. NBTW_005) CDA areas. Any development within these areas should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.

Response:

Agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority.

Action:

Replace paragraph 9.176 with the following wording: The site falls within both the Shenfield (Ref. NBTW_002) and Brentwood (Ref. NBTW_005) CDA areas. Any development within these areas should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.

29591**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9802**Object****Summary of representations:**

- Concerns regarding traffic impacts generated by proposals on local and wider road network and also air pollution.
- Do not consider increasing number of dwellings to be acceptable.
- Access to the site is not suitable or feasible.
- Concerned regarding loss of urban open space which should be maintained or used for wider expansion of local schools.

Summary of representation changes to plan:

- Remove the site and use for other purposes (e.g. school playing field expansion) or reduce the numbers back to 45.
- Need to implement proper traffic management of Priests Lane.
- Add an additional entrance onto Priests Lane.
- The Endeavour School capacity should not be increased.

Response:

- The potential traffic impacts of all allocations identified in the Local Plan have been assessed as part of the Transport Assessment. Appropriate mitigation measures have been established in the Infrastructure Delivery Plan. Further details on potential traffic impacts will need to be addressed as part of any future planning application.
- The access to the site was confirmed by Essex County Council at the hearing sessions as being acceptable in principle with 75 dwellings.
- The site was confirmed through the playing pitch strategy as no longer being in active use. Sport England have no objection provided there is off site contribution towards improvement of existing provision in the area.

Action:

- None required

29441**Object**

Respondent: Julia Ebsworth [5462]

29443**Object**

Respondent: Mr Geoff Sanders [1215]

29444**Object**

Respondent: Mr Stuart Owens [9077]

29445**Object**

Respondent: Juliet Sidaway [9078]

29447**Object**

Respondent: Mr Jack Maleary [9079]

29446	Object
Respondent: Dr S Visvanthan [5694]	
29448	Object
Respondent: Mr Maneesh Jain [9081]	
29449	Object
Respondent: Miss Suzanne Kelt [9082]	
29450	Object
Respondent: Mrs Annabelle Perks [9083]	
29451	Object
Respondent: Mr arif ahmet [9084]	
29452	Object
Respondent: Mr Ronald Hayns [5505]	
29453	Object
Respondent: Mrs Cath Kenyon [5999]	
29454	Object
Respondent: Mr Gary Howe [9085]	
29455	Object
Respondent: Mr Chris Stanley [9086]	
29463	Object
Respondent: Mrs Penelope Ravis [9087]	
29464	Object
Respondent: Priests Lane Neighbourhood Residents Association (Mrs Cath Kenyon) [6046]	

29465	Object
Respondent: Julia and Ray Blencowe [5495]	
29467	Object
Respondent: Mr Jon Mowll [9088]	
29475	Object
Respondent: Mr Robin Ibrahim [5538]	
29567	Object
Respondent: Mr KEVIN MEISTER [9093]	
29616	Object
Respondent: Mr Richard Allum [6060]	
29606	Object
Respondent: P. Steptoe [1217]	
29690	Object
Respondent: Mr Steven Hearn [5492]	
29614	Object
Respondent: Mrs Anne-Marie Hopcroft [7058]	
29705	Object
Respondent: Mrs Natalie Turner [9100]	
29615	Object
Respondent: Mrs Sylvia Allum [5419]	
29708	Object
Respondent: Mrs Clare Walters [5577]	

29689	Object
Respondent: Mr Benjamin Stapley [5455]	
29709	Object
Respondent: Ms Beryl Joyce Clark [1635]	
29691	Object
Respondent: Miss Katherine Webster [6005]	
29734	Object
Respondent: Mrs Susan Matthews [9106]	
29712	Object
Respondent: Mr David Garrett [9103]	
29746	Object
Respondent: Mrs Laura Bazzoni [9109]	
29714	Object
Respondent: Mr Tom Thompson [9102]	
29747	Object
Respondent: Mr Richard Jeffery [6584]	
29737	Object
Respondent: Mrs Andrea Palmer [9108]	
29748	Object
Respondent: Mr Martin Ballard [8227]	
29800	Object
Respondent: Mr Lawrence Allum [5420]	

MM103

9712

Support

Summary of representations:

■ The proposed modification to criterion 2. of Policy R21 is consistent with the requirements of the NPPF.

Summary of representation changes to plan:

■ None required

Response:

■ Noted

Action:

■ None required

29528

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM103

9713

Object

Summary of representations:

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

Replace paragraph 9.185 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of the NPPF.

Reflects ECC's Reg.19 Rep 22480, position in Statement of Common Ground (F17D) between BBC and ECC, and position in ECC's Hearing Statement G7AN – paragraph 1.25.

Summary of representation changes to plan:

Replace paragraph 9.185 with the following wording: The site falls within the Mountnessing (Ref. NBTW_IN002) CDA and is at potential risk of flooding from surface water as show on the EA's Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and where possible should try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.

Response:

Agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority.

Action:

Replace paragraph 9.185 with the following wording: The site falls within the Mountnessing (Ref. NBTW_IN002) CDA and is at potential risk of flooding from surface water as show on the EA's Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and where possible should try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.

29592

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9715

Object

Summary of representations:

ECC as highway and transportation authority welcomes inclusion of text within criterion 1.c. identifying the Brentwood Cycle Action Plan.

In order to futureproof the policy and ensure that development provides the appropriate walking and cycling provision in the future, in line with NPPF paragraphs 92.c, 104 c and 106 d, the supporting text should provide clarity on the types of other 'relevant evidence' which is referenced in the Policy. It should be made clear that such evidence should include details on future key destinations and attractors for walking and cycling connections.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to Policy R21 which provides clarity to applicants and decision makers on what is considered relevant evidence and matters it should include.

Response:

Disagree, suggested additional supporting text not considered necessary to make Policy sound. The consideration of relevant evidence would be addressed at the application stage.

Action:

None required

29675

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM104

9716

Support

Summary of representations:

The proposed modification to criterion 2. of Policy R22 is consistent with the requirements of the NPPF.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29529

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9717**Object****Summary of representations:**

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

Replace paragraph 9.190 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of the NPPF.

Reflects ECC's Reg.19 Rep 22482, position in Statement of Common Ground (F17D) between BBC and ECC, and position in ECC's Hearing Statement G7AN – paragraph 1.25.

Summary of representation changes to plan:

Replace paragraph 9.190 with the following wording: The site falls within the Mountnessing (Ref. NBTW_IN002) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.

Response:

Agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority.

Action:

Replace paragraph 9.190 with the following wording: The site falls within the Mountnessing (Ref. NBTW_IN002) CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.

29593**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM105

9719

Object

Summary of representations:

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including reference to potential risk of flooding, and links to sustainable drainage and flood risk Local Plan policies, provides clarity to applicants/decisions makers of need for consideration of flooding matters at beginning of planning process.

Insert clarification in respect of Floods and SuDS after paragraph 9.193, in line with paragraphs 159 and 160 of the NPPF.

Reflects ECC's Reg.19 Rep 22483 and Statement of Common Ground (F17D) position between BBC and ECC.

Summary of representation changes to plan:

Insert following wording as additional paragraph after paragraph 9.193 – The proposed development area is not within an area identified at risk of flooding. It should however be ensured that any development within this area complies with the requirements in Policy BE05 Sustainable Drainage and Policy NE09 Flood Risk.

Response:

Disagree, suggested amendment not considered necessary to make policy sound. It would add unnecessary repetition and cross referencing.

Action:

None required

29594

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9720

Object

Summary of representations:

In relation to contributions that might be sought from it towards infrastructure, policy text should be clear contributions should only be demanded where necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.

Summary of representation changes to plan:

We consider that, to ensure the policy is effective, justified, and provides clarity to decision-makers, the policy text should make clear that contributions will only be sought where they are necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

Response:

Disagree, CIL Regulation 122 (which require planning obligations to be necessary, related to development, fairly and reasonably related in scale and kind to development) states that this regulation applies at the point of planning application determination. Compliance to CIL Regulation 122 and paragraph 57 of the NPPF therefore will be dealt with at the planning application stage. It is not necessary to repeat national policy and guidance in the policy. No changes required.

Action:

None required

30287

Object

Respondent: Stonebond Properties Ltd [5948]

Agent: Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

MM106

9721

Object

Summary of representations:

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including reference to potential risk of flooding, and links to sustainable drainage and flood risk Local Plan policies, provides clarity to applicants/decisions makers of need for consideration of flooding matters at beginning of planning process.

Insert clarification in respect of Floods and SuDS after paragraph 9.196, in line with paragraphs 159 and 160 of the NPPF.

Reflects ECC's Reg.19 Rep 22485 and Statement of Common Ground (F17D) position between BBC and ECC

Summary of representation changes to plan:

Insert following wording as additional paragraph after paragraph 9.196 – The proposed development area is not within an area identified at risk of flooding. It should however be ensured that any development within this area complies with the requirements in Policy BE05 Sustainable Drainage and Policy NE09 Flood Risk.

Response:

Disagree, suggested amendment not considered necessary to make policy sound. It would add unnecessary repetition and cross referencing.

Action:

None required

29595

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM107

9726

Support

Summary of representations:

Support the continued inclusion of Policy R25 that confirms the Land north of Woollard Way as an appropriate site for residential development.

Also support proposed modification to increase approximate number of homes from 30 to 40 which reflects discussions during the hearing sessions to target densities and consistency with National Policy.

Detailed wording relating to access, pedestrian and cycle links, and open space are supported, as is the inclusion of references to other policies within the Plan.

Reference to financial contributions being made to off-site highways infrastructure improvements is acknowledged and in accordance with draft Policy BE08.

The amended delivery trajectory is considered realistic.

The requirement for a proportion of affordable housing to be reserved for people who can demonstrate a strong local connection, or are over the age of 50, has been removed from the policy. However, reference to this provision seems to be retained in the supporting text at paragraph 9.198. With work with the Council on the best approach to delivering necessary provision.

Summary of representation changes to plan:

Check if paragraph 9.198 should be removed.

Response:

Agree, delete paragraph 9.198 to make policy effective.

Action:

Delete paragraph 9.198

29852

Support

Respondent: Anderson Group (Mr Alasdair Sherry, Senior Planning Coordinator) [9118]

9846

Object

Summary of representations:

ECC as the Lead Local Flood Authority advises that this site is not identified as being within a Critical Drainage Area (CDA).

In order to ensure factual representation of the current position in respect of flooding Criterion 2. of Policy R25 should be deleted.

Summary of representation changes to plan:

Delete criterion 2. from Policy R25

Response:

Agree, amend Policy R25 as suggested to make it justified. This will be in line with Lead Local Flood Authority advice.

Action:

Delete criterion 2. from Policy R25

29596

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9847

Object

Summary of representations:

ECC as Lead Local Flood Authority (LLFA) for BBC consider that the inclusion of site specific text within supporting text of site specific policies, in particular, including links back to sustainable drainage and flood risk policies in the Local Plan, will provide clarity to applicants and decisions makers of need for consideration of flooding matters at the beginning of the planning process.

Insert clarification in respect of Floods and SuDS after paragraph 9.200, in line with paragraphs 159 and 160 of NPPF.

This reflects ECC's Reg.19 Rep 22487.

Summary of representation changes to plan:

Insert following wording as additional paragraph after paragraph 9.200 – The proposed development area is not within an area identified at risk of flooding. It should however be ensured that any development within this area complies with the requirements in Policy BE05 Sustainable Drainage and Policy NE09 Flood Risk.

Response:

Disagree, suggested amendment not considered necessary to make policy sound. It would add unnecessary repetition and cross referencing.

Action:

None required

29598

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9849**Object****Summary of representations:**

Criterion 1.a. states vehicular access via Redrose Lane or Nine Ashes Road.

ECC as highway and transportation authority has previously advised that vehicular access from Redrose Lane may not be able to meet highway standards, and it could be more appropriate to take access from Nine Ashes Road. It is now understood that a scheme can be achieved on site which provides access from Nine Ashes Road only.

Delete reference to Redrose Lane in criterion 1.a

This reflects ECC's Reg.19 Rep 22488, paragraph 1.30 of Hearing Statement G7AN, and position in Statement of Common Ground with BBC (F17D).

Summary of representation changes to plan:

Delete words 'Redrose Lane or' from criterion 1.a of Policy R25.

Response:

Agree, amend Policy R25 as suggested to make effective. This will then be in line with the Local Highway Authority advice.

Action:

Delete words 'Redrose Lane or' from criterion 1.a of Policy R25.

29599**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9850**Object****Summary of representations:**

Paragraph 9.199 states vehicular access via Redrose Lane or Nine Ashes Road.

ECC as highway and transportation authority has previously advised that vehicular access from Redrose Lane may not be able to meet highway standards, and it could be more appropriate to take access from Nine Ashes Road. It is now understood that a scheme can be achieved on site which provides access from Nine Ashes Road only.

Delete reference to Redrose Lane in paragraph 9.199

This reflects ECC's Reg.19 Rep 22489, paragraph 1.30 of Hearing Statement G7AN, and position in Statement of Common Ground with BBC (F17D).

Summary of representation changes to plan:

Delete words 'Redrose Lane or' from paragraph 9.199.

Response:

Agree, amend Paragraph 9.199 as suggested to make effective. This will then be in line with the Local Highway Authority advice.

Action:

Delete words 'Redrose Lane or' from paragraph 9.199.

29600

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9851

Object

Summary of representations:

ECC as highway and transportation authority welcomes inclusion of text within criterion 1.b identifying the Brentwood Cycle Action Plan.

In order to futureproof the policy and ensure that development provides the appropriate walking and cycling provision in the future, in line with paragraphs 92.c, 104 c, and 106d of NPPF, the supporting text should provide clarity on the types of other 'relevant evidence' which is referenced in the Policy. It should be made clear that such evidence should include details on future key destinations and attractors for walking and cycling connections.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to Policy R25 which provides clarity to applicants and decision makers on what is considered relevant evidence and matters it should include.

Response:

Disagree, suggested additional supporting text not considered necessary to make Policy sound. The consideration of relevant evidence would be addressed at the application stage.

Action:

None required

29670

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9857**Object****Summary of representations:**

Concerns regarding the proposed allocations in Blackmore relating to flooding, lack of infrastructure (roads, public transport, schools, doctors and amenities etc) and impact on the natural environment.

Disagree with reinstatement of 70 dwellings (total) by the Inspectors.

Red Rose Lane and Orchard Piece are not suitable access points.

Environment Agency were not properly consulted.

Blackmore should not be classified as a category 3 village, should be category 4.

Properties will be unaffordable.

Summary of representation changes to plan:

Remove the site allocations in Blackmore and identify growth elsewhere in the Borough. Site needs to be reassessed in terms of its suitability before the plan proceeds. Flooding issues need to be resolved.

Response:

The Council has assessed all site submissions in terms of deliverability, availability and suitability to meet its objectively assessed local housing needs for the Borough. The proposed spatial strategy is considered to be sustainable. We recognise that not all development equally distributed across the Borough as there many other factors that need to be considered such as land availability and suitability. The Council has consulted its neighbours such as Epping Forest District Council on strategic cross boundary matters, as well as statutory bodies such as Environment Agency, Natural England and Essex County Council (Local Highways Authority, Lead Local Flood Authority, Lead Local Education Authority) on flood risk, highways safety and school capacity issues. With regards to windfall provision the Council has included a proportion within its overall housing provision. The Council has demonstrated during the Examination in Public hearing sessions that Blackmore is correctly identified within Category 3 in the settlement hierarchy due to the level of services currently available. The Council has assessed that it cannot meet its overall housing needs without releasing Green Belt land. It has demonstrated an exceptional circumstance for Green Belt release at site R25 and R26 at the hearing session. The Council considers that site allocations R25 and R26 align with its Strategic Objectives. The revised density of the site reflects evidence submitted (Examination Note F79) as part of the examination. Detailed considerations will be assessed and addressed at the planning application stage, informed by site specific detailed evidence.

Action:

None required

29838**Object**

Respondent: Mr Graham Hesketh [8634]

30570**Object**

Respondent: Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]

29466**Object**

Respondent: Dr. S.J. Jennings [1497]

29472	Object
Respondent: Mr Andrew Borton [9089]	
29499	Object
Respondent: Mr Richard Thwaite [6964]	
29751	Object
Respondent: Mr Craig Stevens [4958]	
29607	Object
Respondent: Mr Raymond Consterdine [9094]	
29753	Object
Respondent: Ms Karen Batterham [9110]	
29641	Object
Respondent: Mrs Joanne Gill [4758]	
29762	Object
Respondent: Mrs Judith Bowland [8642]	
29645	Object
Respondent: Mrs Elisabeth Taylor [2918]	
29783	Object
Respondent: Mr Christopher Gill [8492]	
29649	Object
Respondent: Mr Gary Taylor [8905]	
29796	Object
Respondent: Blackmore Village Hall/Parish Council (Roger Keeble) [301]	

29730	Object
Respondent: Mr Anthony Cross [4376]	
29740	Object
Respondent: Dr Murray Wood [7003]	
29798	Object
Respondent: Mr Christopher Blackwell [8505]	
29755	Object
Respondent: Mrs Elizabeth Birch [9111]	
29863	Object
Respondent: Mrs Edna Williams [4728]	
29801	Object
Respondent: Blackmore Village Hall/Parish Council (Roger Keeble) [301]	
29874	Object
Respondent: Mrs Melanie Sanders [8511]	
29823	Object
Respondent: Mr Gary Sanders [4923]	
29845	Object
Respondent: Ms Victoria Sanders [8482]	
29888	Object
Respondent: Mr Richard Gale [9125]	
29917	Object
Respondent: Mr Marcus Forstner [8160]	

29919	Object
Respondent: Mr Thomas Fahey [9130]	
29947	Object
Respondent: Mr John Eaton [8124]	
29924	Object
Respondent: Mrs Ceri Fisher [8459]	
29954	Object
Respondent: Donna Eaton [8455]	
29969	Object
Respondent: Samantha Dunk [8438]	
29992	Object
Respondent: Mrs Gillean Driver [9138]	
29971	Object
Respondent: Mrs Linda Draper [9135]	
29998	Object
Respondent: Mrs Patricia Dillon [8417]	
29977	Object
Respondent: Mr Daniel Dean [9137]	
30035	Object
Respondent: Mr Kenneth Herring [4841]	
29985	Object
Respondent: Mrs Ruth Dimond [4851]	

30062	Object
Respondent: Mrs Jacqueline Butler [9149]	
30003	Object
Respondent: Ms Linda Cearn [5013]	
30117	Object
Respondent: Mr Alan Butler [9157]	
30010	Object
Respondent: Mr Nick Coleman [9141]	
30123	Object
Respondent: Mrs Pamela Bailey [8010]	
30043	Object
Respondent: Mr Keith Creffield [8001]	
30137	Object
Respondent: Mr Alan Bowland [8121]	
30046	Object
Respondent: Mrs Tina Cranmer [9144]	
30174	Object
Respondent: Mrs Fleur Morgan [4848]	
30139	Object
Respondent: Mrs Hayley Atkins [8712]	
30184	Object
Respondent: Mrs Susan Miers [8695]	

30143	Object
Respondent: Mr Richard Fisher [8480]	
30190	Object
Respondent: Mr Colin Miers [3959]	
30159	Object
Respondent: Mrs Carol Moulder [4719]	
30211	Object
Respondent: Mr Keith Lodge [8969]	
30164	Object
Respondent: Mr Richard Reed [4708]	
30219	Object
Respondent: Mrs Jane Lodge [8006]	
30166	Object
Respondent: Mrs Terri Reed [4303]	
30248	Object
Respondent: Mr Martin Clark [2456]	
30167	Object
Respondent: Mr Brian Marchant [8569]	
30300	Object
Respondent: Mrs Janet Jacob [8692]	
30200	Object
Respondent: Mr Andrew Moulton [9162]	

30307	Object
Respondent: Mr Steven Jacobs [4408]	
30222	Object
Respondent: Mrs Brenda Leigh [9163]	
30317	Object
Respondent: Ms Annie Jackson [8921]	
30242	Object
Respondent: Mr Marc Cohen [4268]	
30370	Object
Respondent: Susan Harris [8686]	
30246	Object
Respondent: Mr Martin Clark [2456]	
30383	Object
Respondent: Mr Michael Juniper [8129]	
30334	Object
Respondent: Mr Ben Holmes [8654]	
30416	Object
Respondent: Miss Laura Harris [8685]	
30388	Object
Respondent: Mr John Lester [4396]	
30449	Object
Respondent: Mr Luke Holmes [8652]	

30397	Object
Respondent: Mrs Danielle Cohen [8313]	
30477	Object
Respondent: Mr Ken Holmes [8691]	
30413	Object
Respondent: Ms Patricia Taylor [6880]	
30511	Object
Respondent: Blackmore Village Heritage Association [8568] Agent: Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]	
30418	Object
Respondent: Ms Patricia Taylor [6880]	
30529	Object
Respondent: Mrs Margaret Roast [9184]	
30423	Object
Respondent: Ms Patricia Taylor [6880]	
30539	Object
Respondent: Mrs Joanne Ryan [8889]	
30431	Object
Respondent: Mrs Patricia Moulton [9176]	
30547	Object
Respondent: Mrs Joan Westover [4635]	
30433	Object
Respondent: Mr Kevin Wood [6965]	

30586	Object
<hr/>	
Respondent: Mrs Lesley Richardson [9186]	
30434	Object
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Respondent: Mr Malcolm Hurford [7304]	
30601	Object
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Respondent: Mr Gary Durdant-Pead [8326]	
30446	Object
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Respondent: Mr Edward Turner [9177]	
30614	Object
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Respondent: Mrs Louise Roast [9188]	
30479	Object
<hr/>	
Respondent: Mrs Janice Holbrook [4700]	
30480	Object
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Respondent: Mr Colin Holbrook [4759]	
30484	Object
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Respondent: Mrs Sara Harris [8122]	
30616	Object
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Respondent: Mrs Rita Tuffey [4620]	
30490	Object
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Respondent: Mr James Harris [8678]	
30629	Object
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Respondent: Mr Nicholas Wilkinson [8406]	

30497	Object
Respondent: Mrs Lucille Foreman [8574]	
30503	Object
Respondent: Mr Colin Foreman [4394]	
30561	Object
Respondent: Mr John Richardson [4858]	
30661	Object
Respondent: Mr Frank Tabor [8424]	
30566	Object
Respondent: Mr John Warner [5018]	
30703	Object
Respondent: Mr Robert Strange [9205]	
30569	Object
Respondent: Mrs Judith Wood [4852]	
30728	Object
Respondent: Mrs Jennifer Sirrell [8093]	
30577	Object
Respondent: Mrs Alison Ratcliffe [5040]	
30746	Object
Respondent: Mr Richard Smart [9208]	
30594	Object
Respondent: Mr Raymond Thompson [4840]	

30749 **Object**

Respondent: Mrs Faye Osborne [8458]

30639 **Object**

Respondent: Mr Derek Tillet [8923]

30752 **Object**

Respondent: Mr John Randall [8852]

30642 **Object**

Respondent: Mr & Mrs Ian and Janet Tennet [9191]

30762 **Object**

Respondent: Mr Ronald Sanders [9209]

30647 **Object**

Respondent: Mr Finn Thompson [9192]

30782 **Object**

Respondent: Mr Anthony Parris [9013]

30677 **Object**

Respondent: Mr Kyle Pounds [9198]

30798 **Object**

Respondent: Ms Jennifer Barry [9212]

30688 **Object**

Respondent: Mrs Julie Pounds [8608]

30806 **Object**

Respondent: Mr Stephen Slaughter [9041]

30712 **Object**

Respondent: Mrs Diane Smith [8388]

30820 **Object**

Respondent: Mrs Janis Smith [4735]

30719 **Object**

Respondent: Mrs Debbie Spencer [6959]

30823 **Object**

Respondent: Miss Carole Scott [8541]

30724 **Object**

Respondent: Mrs Janet Parris [8315]

30824 **Object**

Respondent: Ms Mollie Stenning [9215]

30734 **Object**

Respondent: Mrs Maureen Slimm [5042]

30742 **Object**

Respondent: Mr Darryl Pounds [8609]

MM108

9727

Support

Summary of representations:

Welcome the increase in the number of units from 20 to 30. However, consider that the site has capacity for 40 which is in line with examination note F79 and national policy making optimum use of land.

Part 1. b. of the policy is not considered relevant for this site as there are no new cycle routes proposed in the area, in addition the term "other relevant evidence" is too ambiguous.

Part 3a of the policy requires financial contributions to unspecified off-site highway improvements. There are no known items attributed to site R26 therefore should be removed. Any local highway improvements will be discussed and agreed through the course of a planning application.

Page 240 of the MM schedule reads "Amend paragraph 9.201 to read", and incorrectly locates R26 as "north of Blackmore on land off Redrose Lane and Woollard Way". The site is not located off Woollard Way.

Page 239 and 240 of the MM schedule refers "to vehicular access via Redrose Lane, Orchard Piece or Fingrith Hall Lane".

Access via Fingrith Hall Lane is not possible for site R26.

Summary of representation changes to plan:

Change number of dwellings to "around 40". Remove part 1. b and 3 from the policy. Ensure site name and possible vehicular access points are correct.

Response:

Number of dwellings - Disagree, number of dwellings is considered to be appropriate and in line with density analysis

Clause 1 b) - Disagree, Part 1. B. of the policy is considered appropriate to ensure that appropriate consideration is given to providing good pedestrian and cycle access;

Part 3 - Disagree, part 3 is considered appropriate as there is a need for all sites to consider the cumulative impact that development can have on highway infrastructure.

Site name - Agree, site name to be corrected to make policy effective.

Access point - Disagree, Fingrith Hall Road adjoins the western boundary of the site allocation so is considered to still be appropriate to list as a possible access point.

Action:

Correct site name to refer to 'Land off Orchard Piece'.

29855

Support

Respondent: Crest Nicholson [2509]

Agent: Savills UK (Mr Ben Thomas, Associate) [2271]

9852**Object****Summary of representations:**

ECC as the Lead Local Flood Authority advises that this site is not identified as being within a Critical Drainage Area (CDA).

In order to ensure factual representation of the current position in respect of flooding Criterion 2. of Policy R26 should be deleted.

Summary of representation changes to plan:

Delete criterion 2. from Policy R26.

Response:

Agree, amend Policy R25 as suggested to make it justified. This will be in line with Lead Local Flood Authority advice.

Action:

Delete criterion 2. from Policy R26.

29597**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9853**Object****Summary of representations:**

Criterion 1. a. of Policy R26 states that vehicular access should be via Redrose Lane, Orchard Piece or Fingrith Hall Lane.

ECC as highway and transportation authority have previously advised that vehicular access from Redrose Lane may not be able to meet highway standards. It would be more appropriate to take access from Orchard Piece, or after further consideration Fingrith Hall Road.

The policy should therefore be amended to reflect this and delete reference to Redrose Lane.

This reflects ECC's Reg.19 Rep 22492.

Summary of representation changes to plan:

Delete words 'Redrose Lane,' from criterion 1.a of Policy R26

Response:

Agree, amend Policy R26 as suggested to make effective. This will then be in line with the Local Highway Authority advice.

Action:

Delete words 'Redrose Lane,' from criterion 1.a of Policy R26

29601**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9854**Object****Summary of representations:**

Paragraph 9.203 makes reference to the main vehicular access for the site to be via Redrose Lane, Orchard Piece or Fingrith Hall Lane.

ECC as highway and transportation authority have previously advised that vehicular access from Redrose Lane may not be able to meet highway standards. It would be more appropriate to take access from Orchard Piece, or after further consideration Fingrith Hall Road.

The paragraph should therefore be amended to reflect this and delete reference to Redrose Lane.

This reflects ECC's Reg.19 Rep 22494.

Summary of representation changes to plan:

Delete words 'Redrose Lane,' from paragraph 9.203.

Response:

Agree, amend paragraph 9.203 as suggested to make effective. This will then be in line with the Local Highway Authority advice.

Action:

Delete words 'Redrose Lane,' from paragraph 9.203.

29602**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9855**Object****Summary of representations:**

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including reference to potential risk of flooding, and links to sustainable drainage and flood risk Local Plan policies, provides clarity to applicants/decisions makers of need for consideration of flooding matters at beginning of planning process.

Insert additional wording after para.9.204 to ensure factual representation of current flooding position, in line with paragraphs 159 and 160 of NPPF.

Reflects ECC's Reg.19 Rep 22491 and Statement of Common Ground (F17D) position between BBC and ECC.

Summary of representation changes to plan:

Insert following wording as additional paragraph after 9.204 - The proposed development area is at potential risk of flooding from surface water as show on the EA's Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and where possible should try to have a positive impact on existing areas of flood risk downstream of the development. It should however be ensured that any development within this area complies with the requirements in Policy BE05 Sustainable Drainage and Policy NE09 Flood Risk.

Response:

Part agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority. Do not accept suggested final sentence as it adds unnecessary repetition and cross referencing.

Action:

Insert following wording as additional paragraph after 9.204 - The proposed development area is at potential risk of flooding from surface water as show on the EA's Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and where possible should try to have a positive impact on existing areas of flood risk downstream of the development.

29603**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9856**Object****Summary of representations:**

ECC as highway and transportation authority welcomes inclusion of text within criterion 1.b identifying the Brentwood Cycle Action Plan.

In order to futureproof the policy and ensure that development provides the appropriate walking and cycling provision in the future, in line with paragraphs 92.c, 104 c, and 106d of NPPF, the supporting text should provide clarity on the types of other 'relevant evidence' which is referenced in the Policy. It should be made clear that such evidence should include details on future key destinations and attractors for walking and cycling connections.

Summary of representation changes to plan:

BBC should include appropriate wording within the supporting text to Policy R26 which provides clarity to applicants and decision makers on what is considered relevant evidence and matters it should include.

Response:

Disagree, suggested additional supporting text not considered necessary to make Policy sound. The consideration of relevant evidence would be addressed at the application stage.

Action:

None required

29671**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9858**Object****Summary of representations:**

Concerns regarding the proposed allocations in Blackmore relating to flooding, lack of infrastructure (roads, public transport, schools, doctors and amenities etc) and impact on the natural environment.

Disagree with reinstatement of 70 dwellings (total) by the Inspectors.

Red Rose Lane and Orchard Piece are not suitable access points.

Environment Agency were not properly consulted.

Blackmore should not be classified as a category 3 village, should be category 4.

Properties will be unaffordable.

Summary of representation changes to plan:

Remove the site allocations in Blackmore and identify growth elsewhere in the Borough. Site needs to be reassessed in terms of its suitability before the plan proceeds. Flooding issues need to be resolved

Response:

The Council has assessed all site submissions in terms of deliverability, availability and suitability to meet its objectively assessed local housing needs for the Borough. The proposed spatial strategy is considered to be sustainable. We recognise that not all development equally distributed across the Borough as there many other factors that need to be considered such as land availability and suitability. The Council has consulted its neighbours such as Epping Forest District Council on strategic cross boundary matters, as well as statutory bodies such as Environment Agency, Natural England and Essex County Council (Local Highways Authority, Lead Local Flood Authority, Lead Local Education Authority) on flood risk, highways safety and school capacity issues. With regards to windfall provision the Council has included a proportion within its overall housing provision. The Council has demonstrated during the Examination in Public hearing sessions that Blackmore is correctly identified within Category 3 in the settlement hierarchy due to the level of services currently available. The Council has assessed that it cannot meet its overall housing needs without releasing Green Belt land. It has demonstrated an exceptional circumstance for Green Belt release at site R25 and R26 at the hearing session. The Council considers that site allocations R25 and R26 align with its Strategic Objectives. The revised density of the site reflects evidence submitted (Examination Note F79) as part of the examination. Detailed considerations will be assessed and addressed at the planning application stage, informed by site specific detailed evidence.

Action:

None required

29839**Object**

Respondent: Mr Graham Hesketh [8634]

30571**Object**

Respondent: Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]

29473**Object**

Respondent: Mr Andrew Borton [9089]

29752	Object
Respondent: Mr Craig Stevens [4958]	
29500	Object
Respondent: Mr Richard Thwaite [6964]	
29754	Object
Respondent: Ms Karen Batterham [9110]	
29608	Object
Respondent: Mr Raymond Consterdine [9094]	
29763	Object
Respondent: Mrs Judith Bowland [8642]	
29613	Object
Respondent: Mrs Helen Whalley [4233]	
29784	Object
Respondent: Mr Christopher Gill [8492]	
29738	Object
Respondent: Dr Murray Wood [7003]	
29756	Object
Respondent: Mrs Elizabeth Birch [9111]	
29797	Object
Respondent: Blackmore Village Hall/Parish Council (Roger Keeble) [301]	
29787	Object
Respondent: Mr Anthony Cross [4376]	

29799	Object
Respondent: Mr Christopher Blackwell [8505]	
29864	Object
Respondent: Mrs Edna Williams [4728]	
29802	Object
Respondent: Blackmore Village Hall/Parish Council (Roger Keeble) [301]	
29875	Object
Respondent: Mrs Melanie Sanders [8511]	
29846	Object
Respondent: Ms Victoria Sanders [8482]	
29889	Object
Respondent: Mr Richard Gale [9125]	
29918	Object
Respondent: Mr Marcus Forstner [8160]	
29920	Object
Respondent: Mr Thomas Fahey [9130]	
29948	Object
Respondent: Mr John Eaton [8124]	
29925	Object
Respondent: Mrs Ceri Fisher [8459]	
29955	Object
Respondent: Donna Eaton [8455]	

29970	Object
Respondent: Samantha Dunk [8438]	
29993	Object
Respondent: Mrs Gillean Driver [9138]	
29972	Object
Respondent: Mrs Linda Draper [9135]	
29999	Object
Respondent: Mrs Patricia Dillon [8417]	
29978	Object
Respondent: Mr Daniel Dean [9137]	
30036	Object
Respondent: Mr Kenneth Herring [4841]	
29986	Object
Respondent: Mrs Ruth Dimond [4851]	
30124	Object
Respondent: Mrs Pamela Bailey [8010]	
30004	Object
Respondent: Ms Linda Cearn [5013]	
30138	Object
Respondent: Mr Alan Bowland [8121]	
30011	Object
Respondent: Mr Nick Coleman [9141]	

30175	Object
Respondent: Mrs Fleur Morgan [4848]	
30044	Object
Respondent: Mr Keith Creffield [8001]	
30185	Object
Respondent: Mrs Susan Miers [8695]	
30047	Object
Respondent: Mrs Tina Cranmer [9144]	
30191	Object
Respondent: Mr Colin Miers [3959]	
30140	Object
Respondent: Mrs Hayley Atkins [8712]	
30212	Object
Respondent: Mr Keith Lodge [8969]	
30144	Object
Respondent: Mr Richard Fisher [8480]	
30220	Object
Respondent: Mrs Jane Lodge [8006]	
30160	Object
Respondent: Mrs Carol Moulder [4719]	
30249	Object
Respondent: Mr Martin Clark [2456]	

30165	Object
Respondent: Mr Richard Reed [4708]	
30301	Object
Respondent: Mrs Janet Jacob [8692]	
30168	Object
Respondent: Mr Brian Marchant [8569]	
30308	Object
Respondent: Mr Steven Jacobs [4408]	
30223	Object
Respondent: Mrs Brenda Leigh [9163]	
30318	Object
Respondent: Ms Annie Jackson [8921]	
30243	Object
Respondent: Mr Marc Cohen [4268]	
30417	Object
Respondent: Miss Laura Harris [8685]	
30247	Object
Respondent: Mr Martin Clark [2456]	
30450	Object
Respondent: Mr Luke Holmes [8652]	
30264	Object
Respondent: Mrs Terri Reed [4303]	

30478	Object
Respondent: Mr Ken Holmes [8691]	
30335	Object
Respondent: Mr Ben Holmes [8654]	
30512	Object
Respondent: Blackmore Village Heritage Association [8568] Agent: Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]	
30389	Object
Respondent: Mr John Lester [4396]	
30530	Object
Respondent: Mrs Margaret Roast [9184]	
30398	Object
Respondent: Mrs Danielle Cohen [8313]	
30540	Object
Respondent: Mrs Joanne Ryan [8889]	
30415	Object
Respondent: Ms Patricia Taylor [6880]	
30548	Object
Respondent: Mrs Joan Westover [4635]	
30419	Object
Respondent: Ms Patricia Taylor [6880]	
30588	Object
Respondent: Mrs Lesley Richardson [9186]	

30424 **Object**

Respondent: Ms Patricia Taylor [6880]

30603 **Object**

Respondent: Mr Gary Durdant-Pead [8326]

30432 **Object**

Respondent: Mrs Patricia Moulton [9176]

30615 **Object**

Respondent: Mrs Louise Roast [9188]

30435 **Object**

Respondent: Mr Malcolm Hurford [7304]

30617 **Object**

Respondent: Mrs Rita Tuffey [4620]

30437 **Object**

Respondent: Mr Kevin Wood [6965]

30630 **Object**

Respondent: Mr Nicholas Wilkinson [8406]

30448 **Object**

Respondent: Mr Edward Turner [9177]

30704 **Object**

Respondent: Mr Robert Strange [9205]

30481 **Object**

Respondent: Mr Colin Holbrook [4759]

30485	Object
Respondent: Mrs Sara Harris [8122]	
30729	Object
Respondent: Mrs Jennifer Sirrell [8093]	
30491	Object
Respondent: Mr James Harris [8678]	
30747	Object
Respondent: Mr Richard Smart [9208]	
30498	Object
Respondent: Mrs Lucille Foreman [8574]	
30504	Object
Respondent: Mr Colin Foreman [4394]	
30563	Object
Respondent: Mr John Richardson [4858]	
30750	Object
Respondent: Mrs Faye Osborne [8458]	
30567	Object
Respondent: Mr John Warner [5018]	
30753	Object
Respondent: Mr John Randall [8852]	
30572	Object
Respondent: Mrs Judith Wood [4852]	

30763 **Object**

Respondent: Mr Ronald Sanders [9209]

30578 **Object**

Respondent: Mrs Alison Ratcliffe [5040]

30799 **Object**

Respondent: Ms Jennifer Barry [9212]

30595 **Object**

Respondent: Mr Raymond Thompson [4840]

30809 **Object**

Respondent: Mr Stephen Slaughter [9041]

30640 **Object**

Respondent: Mr Derek Tillet [8923]

30822 **Object**

Respondent: Mrs Janis Smith [4735]

30643 **Object**

Respondent: Mr & Mrs Ian and Janet Tennet [9191]

30825 **Object**

Respondent: Ms Mollie Stenning [9215]

30648 **Object**

Respondent: Mr Finn Thompson [9192]

30678 **Object**

Respondent: Mr Kyle Pounds [9198]

30689

Object

Respondent: Mrs Julie Pounds [8608]

30718

Object

Respondent: Mrs Diane Smith [8388]

30720

Object

Respondent: Mrs Debbie Spencer [6959]

30725

Object

Respondent: Mrs Janet Parris [8315]

30735

Object

Respondent: Mrs Maureen Slimm [5042]

30743

Object

Respondent: Mr Darryl Pounds [8609]

MM109

9729

Support

Summary of representations:

With regards to access and criterion 2.b., ECC as highway and transportation authority previously made representations recommending that BBC needed to demonstrate that suitable access arrangements for all modes of travel could be achieved, including appropriate mitigation/improvements, and demonstrate what discussions had taken place the relevant Highway Authorities, to ensure that access arrangements are deliverable and agreed.

ECC confirms it has agreed in principle that an access to the site from Warley Street (B186) can be achieved.

This modification has addressed ECC's Reg.19 Reprs 22498 and 22501.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29533

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9834

Object

Summary of representations:

In order to ensure that all highway works are identified, including site access from the highway, criterion 4.a. needs to be amended.

Summary of representation changes to plan:

Amend criterion 4.a. of Policy E11 as follows: Replace word 'and' with a comma between words 'mitigation' and 'A127/B186' Insert words 'and highway site access,' between words 'works' and 'the applicant'

Response:

Agree, amend policy as suggested to make effective.

Action:

Amend criterion 4.a. of Policy E11 as follows: Replace word 'and' with a comma between words 'mitigation' and 'A127/B186' Insert words 'and highway site access,' between words 'works' and 'the applicant'

29700

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9835**Object****Summary of representations:**

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including reference to potential risk of flooding, and links to sustainable drainage and flood risk Local Plan policies, provides clarity to applicants/decisions makers of need for consideration of flooding matters at beginning of planning process.

Insert additional wording after para.9.210 to ensure factual representation of current flooding position, in line with NPPF paragraphs 159, 160.

Reflects ECC's Reg.19 Rep 22499, position in Statement of Common Ground (F17D) between BBC and ECC, Hearing Statement G7AN-paragraph1.42.

Summary of representation changes to plan:

Insert following wording as additional paragraph after 9.210 - The proposed development area is at potential risk of flooding from surface water as show on the EA's Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and where possible should try to have a positive impact on existing areas of flood risk downstream of the development. It should however be ensured that any development within this area complies with the requirements in Policy BE05 Sustainable Drainage and Policy NE09 Flood Risk.

Response:

Part agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority. Do not accept suggested final sentence as it adds unnecessary repetition and cross referencing.

Action:

Insert following wording as additional paragraph after 9.210 - The proposed development area is at potential risk of flooding from surface water as show on the EA's Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and where possible should try to have a positive impact on existing areas of flood risk downstream of the development.

29604**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9836**Object**

Summary of representations:

ECC acknowledges that the provision of Early Years and Childcare (EYCC) facilities on employment sites can be beneficial to the development, increasing the attractiveness for employees. However, the most recent ECC Developers' Guide to Infrastructure Contributions (updated 2020) no longer specifically requires the delivery of EYCC facilities (and/or contributions) as part of proposals for employment development. Whilst ECC would encourage the provision of a 56 place facility to be delivered on-site to support employees, we cannot insist on this requirement being a prerequisite for the development. Criterion 2.a. of Policy E11 should be deleted.

Summary of representation changes to plan:

Delete criterion 2.a. from Policy E11.

Response:

Agree, delete criterion 2.a. of Policy E11 as suggested to make policy effective. This is in line with the updated ECC Developers' Guide to Infrastructure Contributions.

Action:

Delete criterion 2.a. from Policy E11.

29568**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9837**Object**

Summary of representations:

It is unclear to ECC as highway and transportation authority why 'Demand Responsive Travel' has been included within criterion 2.d., as it is considered to be part of passenger transport. Reference to 'Demand Responsive Travel' should be deleted and 'public' changed to 'passenger'.

Summary of representation changes to plan:

Replace criterion 2.d. of Policy E11 with the following: 'new passenger transport links with the surrounding area;'

Response:

Agree, amend policy as suggested to make it effective.

Action:

Replace criterion 2.d. of Policy E11 with the following: 'new passenger transport links with the surrounding area;'

29693**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9838**Object****Summary of representations:**

Given the scale of the allocation, Policy E11 needs to include criteria requiring a range of unit sizes supporting start-ups, as well as those businesses that have outgrown their initial accommodation. The need for such requirements is evidenced in the South Essex Grow-on Space Study (February 2020).

Summary of representation changes to plan:

Provide additional criteria in Policy E11 to ensure that a range of unit sizes supporting start-ups, as well as those businesses that have outgrown their initial accommodation is provided.

Response:

Disagree, the requested additional criteria was not previously raised and is not necessary to make the policy sound as providing for a range of unit sizes is not precluded by the policy.

Action:

None required

29569**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9839**Object****Summary of representations:**

ECC welcomes the inclusion of criterion 2.e within Policy E11, however it should be amended to be consistent with criteria in other Local Plan site allocation policies.

In order to futureproof the policy and ensure that development provides the appropriate walking and cycling provision in the future, in line with NPPF 92.c, 104 c, 106d, the supporting text needs to provide clarity on the types of other 'relevant evidence' which is referenced in the Policy. It needs to be made clear that such evidence should include details on future key destinations and attractors for walking and cycling connections.

Summary of representation changes to plan:

Replace criterion 2.e of Policy E11 with the following: 'good pedestrian and cycling connections within the site and to routes identified within the Brentwood Cycle Action Plan or other relevant evidence' BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what is considered relevant evidence and matters it should include.

Response:

Part agree with the suggested modification to policy E11 to make effective. Disagree with suggested additional supporting text as the consideration of relevant evidence would be addressed at the application stage; therefore additional text is not necessary for soundness.

Action:

Replace criterion 2.e of Policy E11 with the following: 'good pedestrian and cycling connections within the site and to routes identified within the Brentwood Cycle Action Plan or other relevant evidence'

29695**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9840**Object****Summary of representations:**

Policy should be clear contributions should only be demanded where necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development;

The proposed reference to J28 is not necessary to make the Plan sound, and therefore is not compliant with Sections 20(7B) and (7C) of the Planning and Compulsory Purchase Act 2004. There is no evidence to suggest that development of the site would be unacceptable in planning terms without improvements to J28; or that contribution would be directly related to the development.

Summary of representation changes to plan:

Reference to contributions to improvements to M25 J28 within Policy E11 is unsound and should be deleted.

Response:

Financial contributions - Disagree, CIL Regulation 122 (which require planning obligations to be necessary, related to development, fairly and reasonably related in scale and kind to development) states that this regulation applies at the point of planning application determination. Compliance to CIL Regulation 122 and paragraph 57 of the NPPF therefore will be dealt with at the planning application stage. It is not necessary to repeat national policy and guidance in the policy. No changes required.

M25 J28 - Disagree, the Local Plan Transport Assessment identified mitigation measures required to address cumulative impacts of planned growth on strategic transport infrastructure, including Junction 28. As such, at this stage, this requirement is in line with the NPPF para 20.b which requires policies to make sufficient provision for transport infrastructure, and para 111 which states development to be prevented if there would be severe residual cumulative impacts on the highways network. Detailed evidence would be required at the planning application stage to determine if contributions should be made and if so their proportionality having regard to CIL Regulation 122 compliance.

Action:

None required

30236**Object**

Respondent: St Modwen Properties PLC and S&J Padfield and Partners [8835]

Agent: Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

9842**Object****Summary of representations:**

Unclear why the Council has changed its position with regards to the amendments to the site boundary and resultant further Green Belt release. Concerned that future decision makers could consider the areas now not proposed to be removed from the Green Belt not to meet the tests in paragraph 150 of the NPPF and therefore constitute inappropriate development;

Summary of representation changes to plan:

As an alternative to removing the areas of land from the Green Belt, we suggest additional supporting text which highlights the three areas in that they are necessary to support BEP and are considered Green Belt compatible development as per paragraph 150 of the NPPF.

Response:

These proposed amendments to the site boundary and Green Belt release were discussed during the hearing discussion. In the event that the areas remain in the Green Belt, proposals will be considered against the criteria the Framework.

Action:

None required

30235**Object**

Respondent: St Modwen Properties PLC and S&J Padfield and Partners [8835]

Agent: Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

9843**Object****Summary of representations:**

Policy E11's requirement for contribution towards EYCC from development at E11 is not justified. A demand for such a contribution is not considered capable of confirming to national policy or CIL Regulations on planning obligations. No residential development of the site is proposed or supported by proposed policy. Recent pre-application discussions with Essex County Council in respect of the proposed development of site E11 have confirmed that Essex County Council would not require a contribution to EYCC from employment development of the site.

Summary of representation changes to plan:

Policy E11's requirement for contribution towards EYCC from development at E11 should be deleted in order to make the policy sound.

Response:

Agree, as per response to ECC representation on this issue, this criteria would be removed.

Action:

Delete criterion 2 a) relating to Early Years and childcare nurseries facilities

30234**Object**

Respondent: St Modwen Properties PLC and S&J Padfield and Partners [8835]

Agent: Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

MM110

9730

Support

Summary of representations:

The Local Plan Transport Assessment (TA) advises that the Childerditch Lane junction with the eastbound A127 (junction 14 in the TA) would operate satisfactorily post Local Plan development. Given the TA recommendations, and the requirement for applicants and decision makers to consider other borough wide policies in the Local Plan, including BE16 – Mitigating the transport impacts of development, ECC does not object in principle to the deletion, of the wording 'consideration for improvements to A127 junction' in criterion 1.d. of Policy E12.

This reaffirms ECC's position as set out in paragraph 1.5 of its Hearing Statement F126B.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29534

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9829

Object

Summary of representations:

ECC as LLFA for BBC consider inclusion of supporting text for site specific policies, including potential risk of flooding references, and links to Local Plan sustainable drainage and flood risk policies, provides clarity to applicants/decisions makers of need for consideration of flooding matters at beginning of planning process.

New paragraph after 9.214 ensures factual representation of current flooding position (NPPF 159, 160). Amend to provide links to Local Plan sustainable drainage and flood risk policies.

Reflects ECC's Reg.19 Rep 22504, position in BBC/ECC SoCG (F17D), and Hearing Statement G7AN – paragraph1.42.

Summary of representation changes to plan:

Replace the words 'flood risk mitigation measures outlined in the Essex SuDS guide' with the words 'the requirements in Policy BE05 Sustainable Drainage and Policy NE09 Flood Risk.' in proposed new paragraph after 9.214.

Response:

Disagree, suggested amendment not considered necessary to make policy sound. It would add unnecessary repetition and cross referencing.

Action:

None required

29701

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9830

Object

Summary of representations:

It is unclear to ECC as highway and transportation authority why 'Demand Responsive Travel' has been included within criterion 1.d, as it is considered to be part of passenger transport. Reference to 'Demand Responsive Travel' should be deleted and 'public' changed to 'passenger'.

Summary of representation changes to plan:

Replace criterion 1.d. of Policy E12 with the following: 'new passenger transport links with the surrounding area;'

Response:

Agree, amend policy as suggested to make it effective.

Action:

Replace criterion 1.d. of Policy E12 with the following: 'new passenger transport links with the surrounding area;'

29694

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9833

Object

Summary of representations:

ECC welcomes the inclusion of criterion 1.c. within Policy E12, however it should be amended to be consistent with criteria in other Local Plan site allocation policies.

In order to futureproof the policy and ensure that development provides the appropriate walking and cycling provision in the future, in line with NPPF 92.c, 104 c, 106d, the supporting text needs to provide clarity on the types of other 'relevant evidence' which is referenced in the Policy. It needs to be made clear that such evidence should include details on future key destinations and attractors for walking and cycling connections.

Summary of representation changes to plan:

Replace criterion 1.c of Policy E12 with the following: 'good pedestrian and cycling connections within the site and to routes identified within the Brentwood Cycle Action Plan or other relevant evidence' BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what is considered relevant evidence and matters it should include.

Response:

Part agree with the suggested modification to policies E10, E11, E12, E13 to make effective. Disagree with suggested additional supporting text as the consideration of relevant evidence would be addressed at the application stage; therefore additional text is not necessary for soundness.

Action:

Replace criterion 1.c of Policy E12 with the following: 'good pedestrian and cycling connections within the site and to routes identified within the Brentwood Cycle Action Plan or other relevant evidence'

29696

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM111

9731

Support

Summary of representations:

In principle ECC as highway and transportation authority is satisfied that Warley Street (B186) could be used as an additional access to the Codham Hall Farm site and the additional wording in criterion 1.a. of Policy E10.

This reaffirms ECC's position in its Examination statement F126B (paragraphs 1.2 and 1.3).

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29535

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9826

Object

Summary of representations:

ECC as LLFA for BBC consider inclusion of supporting text for site specific policies, including potential risk of flooding references, and links to Local Plan sustainable drainage and flood risk policies, provides clarity to applicants/decisions makers of need for consideration of flooding matters at beginning of planning process.

New paragraph after 9.219 ensures factual representation of current flooding position (NPPF 159, 160). Amend to provide links to Local Plan sustainable drainage and flood risk policies.

Reflects ECC's Reg.19 Rep 22506, position in BBC/ECC SoCG (F17D), and Hearing Statement G7AN – paragraph 1.42.

Summary of representation changes to plan:

Replace the words 'flood risk mitigation measures outlined in the Essex SuDS guide' with the words 'the requirements in Policy BE05 Sustainable Drainage and Policy NE09 Flood Risk.' in proposed new paragraph after 9.219.

Response:

Disagree, suggested amendment not considered necessary to make policy sound. It would add unnecessary repetition and cross referencing

Action:

None required

29702

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9827**Object****Summary of representations:**

ECC welcomes the inclusion of criterion 1.d. within Policy E10, however it should be amended to be consistent with criteria in other Local Plan site allocation policies.

In order to futureproof the policy and ensure that development provides the appropriate walking and cycling provision in the future, in line with NPPF 92.c, 104 c, 106d, the supporting text needs to provide clarity on the types of other 'relevant evidence' which is referenced in the Policy. It needs to be made clear that such evidence should include details on future key destinations and attractors for walking and cycling connections.

Summary of representation changes to plan:

Replace criterion 1.d. of Policy E10 with the following: 'good pedestrian and cycling connections within the site and to routes identified within the Brentwood Cycle Action Plan or other relevant evidence' BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what is considered relevant evidence and matters it should include.

Response:

Part agree with the suggested modification to policy E10 to make effective. Disagree with suggested additional supporting text as the consideration of relevant evidence would be addressed at the application stage; therefore additional text is not necessary for soundness.

Action:

Replace criterion 1.d. of Policy E10 with the following: 'good pedestrian and cycling connections within the site and to routes identified within the Brentwood Cycle Action Plan or other relevant evidence'

29697**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9828**Object****Summary of representations:**

Policy text should make clear contributions should only be demanded where necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

It should be noted contributions to infrastructure provision should only be in relation to any additional infrastructure requirements generated by future development of site E10.

We do not consider reference to the M25 J28 and to West Horndon Station as proposed recipients of contributions from development at site E10 could be considered necessary, given the lack of any evidence to suggest that any development at site E10 could be likely to engender a need to make contributions to their improvement. We do not consider that the proposed reference to these infrastructure items in the policy is justified.

Summary of representation changes to plan:

Policy text should make clear contributions should only be demanded where necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.

It should be noted contributions to infrastructure provision should only be in relation to any additional infrastructure requirements generated by future development of site E10.

We do not consider reference to the M25 J28 and to West Horndon Station as proposed recipients of contributions from development at site E10 could be considered necessary, given the lack of any evidence to suggest that any development at site E10 could be likely to engender a need to make contributions to their improvement. We do not consider that the proposed reference to these infrastructure items in the policy is justified.

Response:

Financial contributions - Disagree, CIL Regulation 122 (which require planning obligations to be necessary, related to development, fairly and reasonably related in scale and kind to development) states that this regulation applies at the point of planning application determination. Compliance to CIL Regulation 122 and paragraph 57 of the NPPF therefore will be dealt with at the planning application stage. It is not necessary to repeat national policy and guidance in the policy. No changes required.

Existing employment uses - Noted, any application would be dealt with on its own merits with regards to potential impact and necessary financial contributions. Contribution requirements generated either by new development on land not previously developed, or by redevelopment of existing employment uses would be assessed by detailed evidence at the planning application stage.

J28 and West Horndon Station - Disagree, The Local Plan Transport Assessment identified mitigation measures required to address cumulative impacts of planned growth on strategic transport infrastructure, including Junction 28 and West Horndon Station. As such, at this stage, this requirement is in line with the NPPF para 20.b which requires policies to make sufficient provision for transport infrastructure, and para 111 which states development to be prevented if there would be severe residual cumulative impacts on the highways network. Detailed evidence would be required at the planning application stage to assist the determination of proportionate contributions and CIL Regulation 122 compliance. In addition, connections to West Horndon Station need to be considered in order to address sustainable transport measures

Action:

None required

30163**Object**

Respondent: S&J Padfield and Partners (SJP) [6122]

Agent: Strutt & Parker LLP (Mr Sam Hollingworth, Associate Planner) [6123]

MM112

9823

Object

Summary of representations:

ECC welcomes the inclusion of criterion 1.b. within Policy E13, however it should be amended to be consistent with criteria in other Local Plan site allocation policies.

In order to futureproof the policy and ensure that development provides the appropriate walking and cycling provision in the future, in line with NPPF 92.c, 104 c, 106d, the supporting text needs to provide clarity on the types of other 'relevant evidence' which is referenced in the Policy. It needs to be made clear that such evidence should include details on future key destinations and attractors for walking and cycling connections.

Summary of representation changes to plan:

Replace criterion 1.b. of Policy E13 with the following: 'good pedestrian and cycling connections within the site and to routes identified within the Brentwood Cycle Action Plan or other relevant evidence' BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what is considered relevant evidence and matters it should include.

Response:

Part agree with the suggested modification to policy E13 to make effective. Disagree with suggested additional supporting text as the consideration of relevant evidence would be addressed at the application stage; therefore additional text is not necessary for soundness.

Action:

Replace criterion 1.b. of Policy E13 with the following: 'good pedestrian and cycling connections within the site and to routes identified within the Brentwood Cycle Action Plan or other relevant evidence'

29698

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9825**Object****Summary of representations:**

ECC as LLFA for BBC consider inclusion of supporting text for site specific policies, including potential risk of flooding references, and links to Local Plan sustainable drainage and flood risk policies, provides clarity to applicants/decisions makers of need for consideration of flooding matters at beginning of planning process.

New paragraph after 9.224 ensures factual representation of current flooding position (NPPF 159, 160). Amend to provide links to Local Plan sustainable drainage and flood risk policies.

Reflects ECC's Reg.19 Rep 22507, position in BBC/ECC SoCG (F17D), and Hearing Statement G7AN – paragraph1.42.

Summary of representation changes to plan:

Replace the words 'flood risk mitigation measures outlined in the Essex SuDS guide' with the words 'the requirements in Policy BE05 Sustainable Drainage and Policy NE09 Flood Risk.' in proposed new paragraph after 9.224.

Response:

Disagree, suggested amendment not considered necessary to make policy sound. It would add unnecessary repetition and cross referencing.

Action:

None required

29703**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM113

9732

Support

Summary of representations:

ECC as highway and transportation authority has previously advised that vehicular access via Roman Road may not be able to meet highway standards, and BBC needed to provide evidence to demonstrate safe and suitable access(es), for all highway users, including pedestrians and cyclists could be achieved.

Following further discussions, ECC as highway and transportation authority is in principle satisfied that a suitable access could be achieved from Roman Road, subject to highway improvements.

ECC is satisfied with paragraph 9.227 modified wording.

This modification addresses ECC's Reg.19 Rep 22511 and reaffirms ECC's position in Hearing Statement F121A (paragraphs 1.2-1.4).

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29537

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9733

Support

Summary of representations:

ECC previously advised vehicular access via Roman Road may not be able to meet highway standards. Needed evidence to demonstrate safe and suitable access(es), for all highway users, including pedestrians and cyclists.

Following discussions, ECC as highway and transportation authority is in principle satisfied suitable access could be achieved from Roman Road, subject to highway improvements.

Recommendations of LP TA (j.24 - need to signalise A12 off slip junction with Roman Road) justifies deletion of 'potential'.

ECC satisfied with criterion 1.a. modification, which addresses ECC's Reg.19 Rep 22510 and reaffirms position in Hearing Statement F121A (paragraphs 1.2-1.4).

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29536

Support

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9815

Object

Summary of representations:

ECC as the Lead Local Flood Authority has identified this site as being within a Critical Drainage Area (CDA).

In order to ensure consistency, with the other policies for site allocations located in CDA's, an additional criterion needs to be inserted into Policy E08 to reflect this position.

Summary of representation changes to plan:

Insert an additional criterion into Policy E08 as follows: As the site is located within a Critical Drainage Area development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.

Response:

Agree, amend policy as suggested to make effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority.

Action:

Insert an additional criterion into Policy E08 as follows: As the site is located within a Critical Drainage Area development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.

29605

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9817**Object****Summary of representations:**

ECC welcomes the inclusion of criterion 1.b. within Policy E08, however it should be amended to be consistent with criteria in other Local Plan site allocation policies.

In order to futureproof the policy and ensure that development provides the appropriate walking and cycling provision in the future, in line with NPPF 92.c, 104 c, 106d, the supporting text needs to provide clarity on the types of other 'relevant evidence' which is referenced in the Policy. It needs to be made clear that such evidence should include details on future key destinations and attractors for walking and cycling connections.

Summary of representation changes to plan:

Replace criterion 1.b. of Policy E08 with the following: 'good pedestrian and cycling connections within the site and to routes identified within the Brentwood Cycle Action Plan or other relevant evidence' BBC should include appropriate wording within the supporting text to the policy which provides clarity to applicants and decision makers on what is considered relevant evidence and matters it should include.

Response:

Part agree with the suggested modification to policy E08 to make effective. Disagree with suggested additional supporting text as the consideration of relevant evidence would be addressed at the application stage; therefore additional text is not necessary for soundness.

Action:

Replace criterion 1.b. of Policy E08 with the following: 'good pedestrian and cycling connections within the site and to routes identified within the Brentwood Cycle Action Plan or other relevant evidence'

29699**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9819**Object****Summary of representations:**

ECC as Lead Local Flood Authority for BBC consider inclusion of supporting text for site specific policies, including references to specific Critical Drainage Areas (CDAs) that affect development, provides clarity to applicants/decisions makers of need for consideration of CDAs at beginning of planning process.

ECC welcome new paragraph after 9.229 - ensures factual representation of current flooding position - in line with NPPF 159 and 160.

Recommend CDA reference number 'NBTW_IN002' included - consistency with other supporting text.

Reflects ECC's Reg.19 Rep 22508 and position in Hearing Statement G7AN – paragraph.1.25.

Summary of representation changes to plan:

Insert wording '(Ref.NBTW_IN002)' between words 'Mountnessing' and 'CDA' in new paragraph after 9.229.

Response:

Agree, amend paragraph as suggested to make policy effective. Provides for a consistent approach in line with advice from Lead Local Flood Authority.

Action:

Insert wording '(Ref.NBTW_IN002)' between words 'Mountnessing' and 'CDA' in new paragraph after 9.229.

29650**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9821**Object****Summary of representations:**

Proposed wording is a significant departure from the Statement of Common Ground (SoCG) agreed with the local planning authority and dated 2 February 2021.

Whilst the revised drafting is an improvement on the Pre-Submission draft it is a retrograde step from that proposed in the SoCG. The use of the word "ancillary" fetters the interpretation and application of the policy to the detriment of the broader objectives of the plan. This word should be deleted from the policy.

Summary of representation changes to plan:

HCH propose that Policy E08 should be amended as follows: the word "ancillary" should be deleted from the policy. In the event that the word "ancillary" is deleted the decision maker has greater flexibility in decision making to consider a variety of proposals against the extent to which they support the principal employment uses (Policy E08).

Response:

Disagree, the current wording is considered to be appropriate and sound.

Action:

None required

29882

Object

Respondent: Hallmark Care Homes [9124]**Agent:** Freeths LLP (Mr Paul Brailsford, Partner) [5642]

MM114

9763

Object

Summary of representations:

Based on the Local Development Plan Housing Trajectory in Annexe 1 – MM114 'Appendix 1' Brentwood Borough Council can only demonstrate a 4.5-year housing land supply when using the required Sedgefield method. If the Inspectors find the plan sound request that it is put on public record that the Council is unable to demonstrate a 5 year housing land supply when using the appropriate Sedgefield method.

Summary of representation changes to plan:

The Inspectors should acknowledge that Brentwood Borough Council are unable to demonstrate a 5-year housing land supply when using the appropriate Sedgefield method.

Response:

Disagree, not necessary for soundness. No change required.

Action:

No action required.

29827

Object

Respondent: Tesco Stores Limited [3856]**Agent:** GL Hearn (Mr Selwyn Atkinson) [8822]

MM116

9807

Object

Summary of representations:

With 70 houses in Blackmore our little village would not be sustainable because of the number of cars. 70 houses = 2 cars to 1 house would equate to 140 or more cars

Summary of representation changes to plan:

N/A

Response:

MM116 states that a new Appendix, as shown in Annexe 2, which lists the strategic and non-strategic policies and explains how the policies relate to the strategic objectives as required by planning policy and guidance.

Action:

No action required

29474

Object

Respondent: Mr Andrew Borton [9089]

30550**Object**

Respondent: Mrs Joan Westover [4635]**MM117****9793****Object**

Summary of representations:

Point of clarity - Indicator should read 'developments' not 'develops'.

Delivery of appropriate sustainable transport infrastructure is key to mitigating the growth proposed in the Local Plan.

Alternative options for delivery need to be considered rather than simply reviewing the policy. The Action should be amended to reflect this. less

Summary of representation changes to plan:

Amend Indicator to BE13 (now BE09) as follows: 'Developments provide.....' Amend Action to BE13 (now BE09) as follows: Assess why pedestrian and/or cycle paths are not included within developments or why there is a net loss of pedestrian / cycle paths. Identify alternative options for delivery by the developer to ensure appropriate sustainable transport infrastructure is provided

Response:

Disagree, not considered to be feasible to add in additional monitoring clause. Would not be effective.

Action:

Typo to be amended before adoption.

29617**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

MM117

9796

Object

Summary of representations:

ECC as highway and transportation authority recommends that this is included in Local Plan Monitoring Framework in order to ensure that the full sustainable modes of travel can be monitored. This is considered particularly important given the strong reliance on sustainable travel as a transport mitigation measure in BBC's Local Plan, Transport Assessment, and Infrastructure Delivery Plan.

Summary of representation changes to plan:

Include additional policy to monitor – BE14 (now BE10) Sustainable Passenger Transport as follows: Indicator – The level of infrastructure and service provision Delivery Mechanism – Planning Permission Target – All new dwellings and trip attractors to be within 400m of services. Service levels to be agreed with Highway Authority on a case-by-case basis. Trigger for Action – Inadequate facilities/infrastructure, routing and level of service resulting in low levels of passenger transport patronage. Also, if mode share is too low for public transport compared to car drivers. Action – Review of existing situation and provision of improved facilities, services and infrastructure as necessary

Response:

Disagree, do not consider that these would be feasible to monitor effectively. The Council would not have jurisdiction over the provision and maintenance of bus services

Action:

No action required

29618

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9799

Object

Summary of representations:

Delivery of electric charging points is key to other sustainability and climate change policies in the Local Plan. It is recommended that setting minimum standards should be considered rather than simply reviewing the policy. The target and action should be amended to reflect this.

This would ensure consistency with paragraph 112 of the NPPF, and ECC's proposed amendments to Policy BE15 – MM26.

Summary of representation changes to plan:

Amend Target to BE15 (now BE11) as follows: All developments include electric charging points in line with policy for the level of provision. Amend Action to BE15 (now BE11) as follows: Assess why electric vehicle charging points are not being included in developments. Set minimum standards for electric vehicle charging points to ensure uptake.

Response:

Disagree, no target is set out within the policy, not considered to be effective.

Action:

No action required

29619

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9800

Object

Summary of representations:

ECC as highway and transportation authority recommends that Policy BE16 – Mitigating the transport impacts of development, is included in the Local Plan Monitoring Framework in order to ensure that developments are fully mitigated. The monitoring of transport impacts such as traffic generation from developments can determine if / when additional sustainable modes of transport are required, and/or certain physical highway and transportation infrastructure is required.

This reaffirms ECC's position as set out in its Examination Statement F125A - paragraphs 1.4.

Summary of representation changes to plan:

Include additional policy to monitor – BE16 (now BE12) Mitigating the Transport Impacts of Development as follows:
Indicator – Transport Assessments and Local Plan modelling findings
Delivery Mechanism – Planning Permission Target
– Provide necessary highways improvements and sustainable transport measures in line with planning application transport assessments and the Local Plan Transport Assessment
Trigger for Action – If required infrastructure and services are not provided as identified in line with timescales of the planning obligations and/or monitoring process
Action – Assess why not provided. Ensure necessary highways improvements and sustainable transport measures are delivered

Response:

Disagree, not considered to be feasible or necessary to specifically monitor this item.

Action:

No action required

29620

Object

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9801**Object****Summary of representations:**

The word 'minimum' in the first Trigger for Action should be deleted as it does not allow for flexibility such as changes to parking policy in the future.

The Town centre is a sustainable location and the Local Plan should not be encouraging car use by provision of high level of parking. The second monitoring requirement under BE17 (now BE13) should be deleted.

Summary of representation changes to plan:

Changes to plan: Amend first Trigger for Action to BE17 (now BE13) as follows: Not all developments provide the minimum required level of parking spaces as required identified by the most up to date Essex Parking Standards guidance Amend first Action to BE17 (now BE13) as follows: Assess why not all developments meet the most up to date Essex Parking Standards. Delete monitoring requirement in relating to car parking in Town Centre

Response:

Part agree, trigger for action can be incorporated, first action not agreed.

Action:

amend the trigger for action requirement as suggested

29621**Object**

Respondent: Essex County Council (Mrs Anne Clitheroe, Principal Planning Officer) [6776]

9803**Object****Summary of representations:**

Makes reference under the "housing delivery" indicator, to the delivery of 125 new dwellings, 35% affordable housing and 5% Self and Custom Build housing. We do not agree with the 5% Self and Custom Build element and believe it to be incorrect, because it is not referred to anywhere in the Pre-Submission version of the policy, or the schedule of Main Modifications at MM89, so there should be no reference to it here.

Summary of representation changes to plan:

Should be amended so that reference to "5% Self and Custom Build" under the Housing Indicator column is removed.

Response:

Disagree, all developments of 100 or more dwellings are required to provide 5% self and custom build as per policy HP01 and supported by the Council's Self and Custom build register and discussed during the Local Plan hearing sessions. The monitoring framework clearly illustrates what this would mean for each allocated site for monitoring purposes. No changes required.

Action:

No action required

30267**Object**

Respondent: Crest Nicholson [2509]

Agent: Bidwells (Mr. Steven Butler, Planner) [2089]

Annexe 1 – MM114 Appendix 1 – Local Development Plan Housing Trajectory

9757

Object

Summary of representations:

Brentwood Borough Council should adopt the Sedgfield method when calculating the five-year housing land supply, based on which the Council are only able to demonstrate a 4.5-year housing land supply.

Summary of representation changes to plan:

Should the Inspectors consider the Local Plan 'sound' then we request that the Inspectors put on public record that Brentwood Council are unable to demonstrate a 5- year housing land supply when using the appropriate Sedgfield method. There have been numerous occasions where an independent planning inspector has considered the Sedgfield approach the correct method for 5 year housing land supply calculation.

Response:

Disagree, not necessary for soundness. No change required.

Action:

No action required.

29881

Object

Respondent: GL Hearn [252]

Agent: GL Hearn (Mr Selwyn Atkinson) [8822]

9760

Object

Summary of representations:

The adoption of the Liverpool method in Winchester is an example of where this approach might work without causing delays to the supply of land for housing as Winchester has three strategic sites. A delay in brining forward one strategic site would have no impact on the ability of the other two strategic sites. Since Brentwood relies on a single strategic site then the Liverpool method should not be used to calculate the 5-year housing land supply.

Summary of representation changes to plan:

Use Sedgfield method to calculate 5YHS.

Response:

Disagree, the Liverpool method has been applied and is justified in recognising the longer lead in time for delivery of large strategic sites identified in the Local Plan.

Action:

No action required.

29885

Object

Respondent: GL Hearn [252]

Agent: GL Hearn (Mr Selwyn Atkinson) [8822]

9761**Object****Summary of representations:**

The Housing Trajectory should meet, at least, the Plan's identified housing requirement and ensure a 5YHS. As currently presented, there would be a cumulative shortfall under-supply of 606 dwellings by 2032/33. The Trajectory still results in a very 'fragile' five year housing land supply of 5.21 years. The proposed stepped trajectory in the remaining 12 years of the plan period is unrealistic and result in a significant residual risk in the later years of the plan period. The 'Liverpool' method poses further risk of continued under-delivery. The windfall rate used in MM114 remains artificially inflated.

Summary of representation changes to plan:

Flatten the delivery rate curve of the stepped housing trajectory.

Take a more positive and proactive approach to meeting housing in full with headroom.

Allocate more housing land and sites at sustainable, suitable and available locations, such as site 022 Honeypot Lane.

Response:

Disagree, the Council considers the utilisation of a stepped trajectory a pragmatic approach in response to significant increase in housing delivery. Proposed modification MM10, which proposes new Policy MG06: Local Plan Review, commits the Council to an immediate partial review of the Local Plan in order to identify the required additional supply and close the gap between housing supply and housing need.

The Liverpool method has been applied and is justified in recognising the longer lead in time for delivery of large strategic sites identified in the Local Plan.

Evidence in support of the proposed windfall allowance is published in the Council's Monitoring Report: Housing Delivery, which is updated annually.

Action:

No action required.

29911**Object**

Respondent: U+I Group [9127]

Agent: Chilmark Consulting Limited (Mr. Mike Taylor) [2703]

Annexe 2 – MM116 Appendix 2: Strategic and non-strategic policies and their relationship to Strategic Objectives, Strategic Objective SO1: Managing Growth Sustainably

9813**Object****Summary of representations:**

For the VISION and STRATEGIC OBJECTIVES to be meaningful, sound and effective, they have to be rigorously applied.

The allocations in Blackmore (R25 and R26) fail your tests:

- Blackmore is the remotest village in the entire Borough
- Existing (and future) residents are over-dependent on motor vehicles
- More houses equals more cars, more deliveries, more vehicle movements generally and significantly increased pollution
- There will be a significant negative impact on biodiversity, if two green fields, in the Green Belt, are lost
- MM1 and MM2 are rendered unsound (not effective and not positively prepared), should R25 and R26 remain in the plan

Summary of representation changes to plan:

If MM1, MM2 and all the other 'MM issues' are going to be brought to life in a strategic way, then the only conclusion you can come to take sites R25 and R26 out of this LDP and to at least defer a decision until the immediate partial review/next LDP is constructed (properly and strategically) within the next say, two years. In so doing: 1. BBC will be able to bring to life its Vision and Strategic Objectives 2. A coherent Plan (even a 'Neighbourhood Plan') can be built, strategically, for Villages (plural) in the north of the Borough. Included therein e.g. existing sustainable villages (like Blackmore) can be fully understood before decisions are made other settlements, including 'zombie' villages such as Stondon Massey can actually be rejuvenated; the whole Borough will have a strategic plan. There is one in the making for the south (Dunton Hills Garden Village - a strategy to be applauded). For the Town Centre/Mid-Borough, using available brownfield etc, and we can all do much, much better once strategic thought is given to planning a sustainable future for all village in the north. (NB - BVHA is a proactive, professional and positive organisation, as you will note from the letter attached, from Stonebond (Feb 2021)) I/we are trying to help to get the best outcome for everyone. 3. The criteria for Settlement Hierarchy, in conjunction with point 2., can be built around sound criteria (it's pretty hard to argue with the ONS - why try?) MM5 can be corrected by again deferring decisions for 'northern Villages' / Green Belt etc, until all the facts are properly assessed. Basically Blackmore is not a 'category 3 settlement'. 4. Real flood risk can be assessed before the planning permission stage. The River Wid is a constant as is its propensity to flood. Get the Environment Agency to review the hard evidence in full detail. No amount of SuDS, or other supposed remedies, will stop the existing flooding to existing dwellings. 5. There can be a more in-depth/ longer lasting review of the Green Belt. Clearly further sites are going to have to be added and/or omission sites revisited, as part of the 'immediate partial review'. Furthermore, there needs to be a proper 'Housing Needs Assessment' of all of the Villages in all 'categories', as part of the recommended 'strategic plan for the north'. Why is the current plan to allocate 70 to Blackmore (with no housing need for the type of property likely to be constructed, nil for Doddinghurst (a proper category 3 settlement), nil for Stondon Massey (a zombie village crying out for investment, in line with BBC's strategic objectives) etc. In summary, the vast majority of the LDP works, and is aligned with the Vision and Strategic Objectives. But, the small (insignificant to some?) part in the north cannot be classed as 'strategic' or even justified or sensible. Furthermore there needs to be proper acknowledgement of what Blackmore has already contributed to Brentwood's overall housing demand (Government figures). Redrose Farm (12 units) is treated by BBC as windfall whereas the reality is that BVHA strategic thinking helped bring this to life (12 units). This is what a Local Plan should all be about and the author of this representation remains ready to help, free of charge. Once common sense prevails

Response:

Disagree. All allocated sites in the local plan have been tested and the suitability for development has been supported through various evidence based documents.

Action:

No action required

30554**Object**

Respondent: Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]

29764**Object**

Respondent: Bernard Allen [8830]

29981**Object**

Respondent: Mrs Ruth Dimond [4851]

30037**Object**

Respondent: Mr Kenneth Herring [4841]

30251**Object**

Respondent: Mr Richard Reed [4708]

30507**Object**

Respondent: Blackmore Village Heritage Association [8568]

Agent: Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]

Strategic Objective SO3: Deliver Sustainable Communities with Diverse Economic & Social-cultural Opportunities for All

9808**Object**

Summary of representations:

70 extra homes will inevitably led to more cars, journeys congestion to the village centre and more pollution. The narrow lanes around the village with no pavements do not make it an ideal walkable area but highly dangerous. SO3 considers opportunities to "Deliver Sustainable Communities". Blackmore is already a sustainable thriving village, 70 extra homes will not increase employment opportunities or enhance community facilities that are already overstretched. Taking away of 4 hectares of green land will DESTROY wildlife habitat not enhance it. BBC has little understanding of the community that Blackmore inhabitants have built up over the decades.

Summary of representation changes to plan:

N/A

Response:

The sites allocated in the local plan have undergone various assessments to determine their suitability and considered against the Council Strategic Objectives and priorities.

Action:

No action required.

29840**Object**

Respondent: Mr Graham Hesketh [8634]

Annexe 3 – MM117 Appendix 3 – Monitoring Framework

9734

Support

Summary of representations:

R01 - Natural England strongly supports the inclusion of a target and monitoring action for a minimum delivery of 50% of the sites area as green blue infrastructure at Dunton Hills Garden Village.

Summary of representation changes to plan:

None required

Response:

Noted

Action:

None required

29854

Support

Respondent: Natural England [216]

Agent: Natural England (Ms Anna Oliveri) [9119]

9735

Support

Summary of representations:

NE01 - See suggested amendments.

Summary of representation changes to plan:

Biodiversity Net Gain (BNG) - under 'target' Natural England would expect to see a percentage figure for BNG. Under current proposals a minimum 10% BNG will be mandated by the forthcoming Environment Bill, expected to be effective from 2023. The target set should reflect this future requirement as a minimum. Recreational Disturbance Avoidance and Mitigation Strategy (RAMS). Natural England recommend adding the following under 'action'; 'Ensure equivalent funds are sourced for projects that did not contribute RAMS payments, to ensure the Project is not left with a shortfall.' Sites of Special Scientific Interest (SSSIs) – under 'actions' the LPA should add an action to 'alert Natural England where impacts to SSSI have occurred'. Natural England are concerned that currently it is not clear the how the LPA will monitor SSSIs to identify 'unacceptable environmental impacts', nor is it clear how 'unacceptable environmental impacts' will be identified and defined. In order for monitoring and to be effective, these issues need to be considered and the monitoring policy updated to address these points.

Response:

Agree, update monitoring indicators for Policies NE01 as suggested to make effective.

Action:

NE01 Biodiversity Net Gain (BNG): insert minimum target of 10% BNG.

RAMS: Add following under action: 'Ensure equivalent funds are sourced for projects that did not contribute RAMS payments, to ensure the Project is not left with a shortfall.'

SSSIs: Clarify 'unacceptable environmental impacts'

29853

Support

Respondent: Natural England [216]

Agent: Natural England (Ms Anna Oliveri) [9119]