

**Brentwood Borough Council** 

# Schedule of Additional Modifications

**Brentwood Local Plan Examination** 

March 2022

This document contains the Additional Modifications to the Brentwood Local Plan 2016-2033 as submitted for Examination on 14 February 2020.

These are changes which do not materially affect the Policies of the Local Plan and do not fall within the scope of the Plan Examination. The Council is therefore accountable for these changes.

The proposed Additional Modifications will be made upon adoption of the Local Plan by the Council.

The modifications in the table are expressed either in the conventional form of strikethrough for deletions and underlined bold text for additions, or by specifying the modification in words in *italics*.

Where the text is re-ordered due to restructuring, it will be highlighted in green with strikethrough for deletions and underlined bold for additions.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

#### General

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM1	N/A	Front and back covers	Update front and back covers	To reflect final document title and publication date
AM2	1 - 8	Contents, Policy Index and List of Figures	Update Contents, Policy Index and List of Figures	To reflect the modifications to the Local Plan
AM3	N/A	Page header	Update page header throughout the Local Plan	To reflect final document title and publication date
AM4	N/A	Footnote numbering	Update footnote numbering	So that they follow a sequential order throughout the whole document

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM5	9-10	Figure 1.1	Update figure 1.1 to reflect revised policy structure	To reflect modifications to Policy references, names and structure
AM6	11	Paragraph 1.1	Amend first sentence to read:  This Pre-Submission Local Plan (Publication Draft, Regulation 19) Local Plan presents Brentwood Borough Council's vision for how the borough will develop over the next 17 years, from 2016 to 2033.	Removal of references to Pre- Submission version of the Local Plan
AM7	11	Paragraph 1.3, 1.6 – 1.10 and Figure 1.2	Delete paragraphs 1.3, 1.6 – 1.10 and Figure 1.2	To remove text that is out of date.
AM8	14	Paragraph 1.12	Amend second sentence of paragraph 1.12 to read:  Maintaining effective cooperation is also reinforced by the NPPF (2018 2021, paragraphs 24-27), which calls for one or more 'Statements of Common Ground' to be prepared and maintained on cross-boundary matters being addressed and progress in cooperating to address these. These are to be made publicly available.	To reflect updated NPPF and to remove text that is out of date.
AM9	14	Paragraph 1.14 and 1.16 – 1.18	Delete paragraph 1.14 and 1.16 – 1.18	To remove text that is out of date
AM10	15	Paragraph 1.19 – 1.20	Amend paragraphs 1.19 – 1.20 to read:  As stated above, a A Sustainability Appraisal (SA) has been carried out at key stages in the plan-making process, in line with the Environmental Assessment of Plans and	Removal of references to Pre- Submission version of the Local Plan and out of date text

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
			Programmes Regulations 2004. The Sustainability Appraisal recommendations at each stage have informed the production of this <del>Pre-Submission</del> Local Plan.	
			The SA has considered potential impacts of the Plan on economic, social and environmental considerations and how they can be mitigated. It has also considered several reasonable alternatives to ensure Brentwood's growth strategy is sound. The Sustainability Appraisal is available for public consultation alongside the Pre-Submission Local Plan.	
AM11	15	Paragraph 1.21	Amend paragraph 1.21 to 1.22 to read:	Factual changes
		and 1.22	1.21 In accordance with regulation 64 <u>63</u> of the Conservation of Habitats and Species Regulations <u>2010</u> <u>2017</u> , a Habitats Regulation Assessment (HRA) screening has been undertaken to determine whether the <u>Pre-Submission Local</u> Plan is likely, either alone or in combination with other plans and projects, to have a significant adverse impact on internationally important habitat sites.	
			1.22 To assess the in-combination impacts of new development, a need to prepare a Recreational disturbance Avoidance and Mitigation Strategy (RAMS) has been identified for the <u>internationally important designated wildlife sites on the Essex Estuaries and Coastal Sites Coast.</u> A RAMS <u>is being has been prepared (January 2019)</u> to <u>cover deliver strategic mitigation to avoid impacts on these sites from residential development within the evidenced Zone of Influence, with a view to subsequent adoption as <u>of</u> a Supplementary Planning Document (SPD) by the Council <u>to secure per dwelling developer contributions</u>. Residential development that is likely to <u>adversely</u> affect the integrity of <u>Habitats (European)</u> Sites, is required to either contribute towards mitigation measures identified in the RAMS or, in exceptional circumstances, identify and <u>deliver</u> bespoke mitigation measures (<u>in perpetuity</u>) to ensure compliance with the Habitat Regulations. <u>Mitigation is needed because these impacts</u>, in combination with other plans and projects, cannot be ruled out and a strategic approach is advised by Natural England.</u>	

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM12	15	Paragraph 1.24	Update reference to NPPF from 2018 to 2021.	To reflect updated NPPF
AM13	16	Paragraph 1.27	Amend paragraph 1.27 to read:  There are currently no active quarry sites in Brentwood. However, there are unworked sand and gravel deposits which are subject to a Minerals Safeguarding policy within the Essex Minerals Local Plan 2014. The safeguarding policy requires that Essex County Council, as minerals planning authority, be consulted on development proposals covering five hectares or more within the sand and gravel Minerals Safeguarding Area. The aim of minerals safeguarding is to ensure that mineral resources are not needlessly sterilised by non-mineral development by ensuring their prior extraction, where this is viable, before the non-mineral development is implemented.	To provide further information, as agreed with Eseex County Council via Statement of Common Ground.
AM14	17	Paragraph 1.32	Amend first sentence to read:  The Essex and Southend-on-Sea Replacement Waste Local Plan does not propose any new waste development in Brentwood.	To reflect correct document title
AM15	17	Paragraph 1.34	The Plan also designates Waste Consultation Areas at a distance of 250m around permitted and allocated waste management facilities, extending to 400m in the case of Waste Recycling Centres. Essex County Council must be consulted on all non-waste related development within these areas to ensure that the proposed development would not adversely impact on their existing or future operation. The Brentwood Policies Map identifies existing waste sites within the Council's area.	To provide further clarity, as agreed with Essex County Council via Statement of Common Ground and reflect that reference will need to be made to the Essex and Southend-on-Sea Waste Local Plan for details on permitted and allocated waste

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
				management facilities.

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM16	27	Paragraph 2.29	Amend paragraph 2.29 to read:  Office employment areas are mainly located within the Brentwood Town Centre, Brentwood station area and Warley Business Park. Major employers include BT, Canon, Countryside Properties, Ford and LV Insurance.	To remove text that is out of date.
AM17	29	Paragraph 2.47	Brentwood residents have to travel outside the borough to access main hospital facilities including accident and emergency. However, the borough benefits from a small NHS community hospital in Brentwood and other private medical facilities. GP surgeries are generally at capacity. NHS England has identified an additional the need for GPs additional workforce subject to the location of future development to increase capacity to accommodate future development. Further details can be found in the most up-to-date strategy documents from NHS England include The Five Year Forward View and the NHS Long Term Plan, the emerging STP Estates Strategy and the Essex Health Places Advice Note for planners, developers and designers.	To provide clarity in respect of the NHS' long terms plans for healthcare facilities, in line with Mid & South Essex STP's advice.
AM18	30	Paragraph 2.51	Amend paragraph 2.51 to read:  Primary schools in the borough are generally at capacity, particularly within the Brentwood Urban Area, and some have limited physical space to expand.	To provide further clarity in respect of education planning, in line with Essex

AM Ref Page	Policy / para.	Additional Modifications	Reasons
			County Council's advice.

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
			No proposed Additional Modifications to Chapter 3	

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM19	53	Paragraph 4.23 Paragraph 4.25 Paragraph 4.26 – 4.27 Figure 4.3	Delete paragraph 4.23 and 4.25  Update references to NPPF from 2018 to 2021  Update use class references in figure 4.3 to align with the modified policy	To reflect updated NPPF and provide clarity on use class references
AM20	61	Paragraph 4.48	Amend paragraph 4.48 to read:  The NPPF (2018 2021) states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence, and that this evidence is adequate and proportionate, taking into account relevant market signals. The Local Plan has been created having considered evidence and representations received from consultations on previous drafts. The NPPF (2018 2021, paragraph 33) also states that reviews should be completed no later than five years from the adoption date of the plan, especially to take into account changing circumstances affecting the area, or any relevant changes in national policy.	To reflect updated NPPF and to remove text that is out of date.

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM21	63 - 81	Paragraph 5.2 – 5.3	Update NPPF reference from 2018 to 2021 for both paragraphs 5.2 and 5.3 and for paragraph 5.2 update NPPF reference from paragraph 91 to 92.	To reflect updated NPPF
		Paragraph 5.6 Paragraphs 5.13 - 5.14	Amend paragraph 5.6 to replace 'whilst healthy planning' with 'and promotes healthy communities'	To correct grammatical error and provide clarity

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
		Paragraph 5.20	Amend footnote 5 of paragraph 5.13 to read:	Factual changes
		Figure 5.1 Paragraph 5.41 Paragraph 5.44	Environment Agency (2017) Flood Risk Assessments: Climate Change Allowances. Available at: http://bit.ly/2w5Zo4o. <u>United Kingdom Climate Projections 2018</u> (UKCP18) has started to consider revised risk associated with sea level change.	
		Paragraph 5.45	Amend paragraph 5.14 to read:	
		Paragraph 5.52 Paragraph 5.63	The Climate Change Act (2008) legislates for an 80% reduction in greenhouse gas emissions against 1990 levels by 2050. In June 2019, parliament passed the Climate Change Act 2008 (2050 Target Amendment) Order 2019 committing the UK to reduce net emissions of greenhouse gases to zero by 2050. This requires everyone to be engaged, from national and local government to businesses, households and communities.	
			Amend paragraph 5.20 to update NPPF reference from 2018 to 2021.	To reflect updated NPPF
			Amend Carbon Reduction section of Figure 5.1 to remove references to energy hierarchy	To provide clarity.
			Amend paragraph 5.41 to read:  Incorporating renewable energy generation and energy efficiency measures into new development will be essential in order to achieve carbon reduction targets. The government has set a target to deliver 15% of the UK's energy consumption from renewable sources by 2020 yet in 2016, only 8.9% of our energy was met by renewable generation.	To remove text that is out of date.
			Amend paragraph 5.44, 5.45 and 5.52 to read:  5.44 It is acknowledged that standalone technologies such as large-scale wind turbines and photovoltaic (PV) arrays could be significant sources of energy. The resource assessment in the Brentwood Renewable Energy Study (2014) demonstrated that the borough's renewable energy target will not be possible without	To reflect updated NPPF and correct grammatical errors

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
			deploying large commercial scale renewable technologies. However, stand-alone renewable energy schemes would occur within and could impact on the Green Belt and would also be constrained by proximity to suitable connection to the national electricity grid. Therefore, whilst the Council would encourage opportunities for standalone renewable energy schemes within Brentwood, this will need careful consideration and be assessed on a case-by-case basis. Selection of the most appropriate locations would depend on balancing technical factors (such as proximity to substations) with minimising the impact of those developments through careful siting and mitigation measures. The Council would also support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning, in line with the NPPF (2018, paragraph 152).	
			5.45 Decentralised energy broadly refers to energy that is generated off the main grid, including micro-renewables, heating and cooling. It can refer to energy from waste plants, combined heat and power, district heating and cooling, as well as geothermal, biomass or solar energy. Schemes can serve a single building or a whole community, even being built out across entire cities. Decentralised energy is a rapidly-deployable and efficient way to meet demand, whilst improving energy security and sustainability at the same time. Other benefits of decentralised energy include:	
			i. increased conversion efficiency (capture and use of heat generated, reduced transmission losses);	
			ii. increased use of renewable, carbon-neutral and low-carbon sources of fuel:	
			iii. more flexibility for generation to match local demand patterns for electricity and heat;	
			iv. greater energy security for businesses that control their own generation;	
			v. greater awareness of energy issues through community-based energy systems, driving a change in social attitudes and more efficient use of our energy resources.	

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
			Amend paragraph 5.63 to update NPPF reference from 2018 to 2021 and from paragraph 149 to 153	To reflect updated NPPF
AM22	92	Paragraph 5.87	Amend bracketed (i) to read:  (Policy BE11 BE08 Strategic Transport Infrastructure, Policy BE12 Car-limited development, Policy BE13 BE09 Sustainable Means of Travel and Walkable Street, Policy BE14 BE10 Sustainable Passenger Transport, Policy BE17 BE13 Parking Standards)	To reflect proposed amendments to policies.
AM23	94	Paragraph 5.92	Amend paragraphs 5.92 and 5.96 part b, to update date for Crossrail being fully operational from December 2019 to May 2023.	Factual changes
AM24	97 - 99	Paragraph 5.101 Paragraph 5.104 Paragraph 5.107	Update Transport Assessment reference from 2018 to 2021	To reflect updated Transport Assessment published January 2021

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM25	123	Paragraph 6.2	Amend first sentence to read:  The amount and distribution of housing to be delivered in the borough over the Plan period is established through Policy SP02 MG01 Managing Growth.	To reflect modifications to Policy references

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM26	109	Paragraph 6.11	Amend first sentence to read:  To assist in the delivery of a choice of accommodation, the provision of self and custom housebuilding plots is required to be made available on strategic residential schemes of 500 100 dwellings or more.	Incidental change resulting from the main modifications
AM27	109	Paragraph 6.13	Amend first sentence to read:  The Council will also seek the provision of Specialist Accommodation on strategic residential schemes of 100 dwellings or more,	Incidental change resulting from the main modifications
AM28	113	Paragraph 6.24	Amend paragraph 6.24 to read:  The Council's SHMA Part 2 provides a detailed assessment of the housing required to meet existing and future needs across the borough. The SHMA indicates that if occupation patterns of Sspecialist Rresidential Aaccommodation for older people remain at current levels, there will be a requirement for 494 additional specialist units to 2033. Essex County Council's (ECC) Independent Living Programme is encouraging the provision of Sspecialist Rresidential Aaccommodation in Essex as a means to provide housing for people over the age of 55 whose current home no longer meets their needs. Brentwood has an ageing population which has clear implications for the future delivery of housing over the Local Plan period. Essex County Council (ECC) is the provider of adult social care services in Brentwood. Ecc's their approach to Independent Living (Extra Care) encourages the provision of specialist accommodation in Essex as a means by which older people can continue to live healthy and active lives within existing communities. This approach to meeting the specialist accommodation needs of older people is intended to reduce the demand for residential/nursing home care across the County. Independent Living schemes are part of a wider accommodation pathway to enable older people to remain as independent as possible with the right housing and support to meet their needs. The Council will work with ECC Essex County Council to secure provision of suitable sites.	Grammatical changes and typographical correction

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM29	138	Paragraph 6.51	Amend paragraph 6.51 to read:  This policy should be read in conjunction with Policy HP16 Building Design, Policy HP18 Designing Landscape and the Public Realm, and Policy BE19 Access to Nature. Applicants should also-refer to best practice and guidance on achieving quality design for all new residential development, as set out in the Essex Design Guide.	To reflect modifications to Policy references
AM30	158	Footnote 7	Amend footnote 7 to read:  -https://historicengland.org.uk/advice/technical-advice/information-management/hers/ -http://www.heritagegateway.org.uk/gateway/	Updated weblink
AM31	139	Paragraph 6.61	Amend reference to Policy HP11 to HP10.	To reflect modifications to Policy references
AM32	141	Paragraph 6.66 Paragraphs 6.68 – 6.70	Delete paragraphs 6.66 and 6.68-6.70	Incidental change resulting from the main modifications
AM33	143	Policy HP09	Amend Policy number to read: POLICY HP09 HP08: SAFEGUARDING PERMITTED SITES	To reflect modifications to Policy references
AM34	162	Paragraph 6.134	Amend paragraph to read:  Where there is evidence of deliberate neglect of, or damage to a heritage asset, the deteriorated state of the heritage asset will not be taken into account in any decision	To correct grammatical error
AM35	166	Figure 6.5	Amend Figure 6.5 to delete entries for Back Lane and Sandpit Lane and insert entry for Chivers Road, Stondon Massey, BRWLANE14	Factual changes to reflect assessments carried out by Essex

#### Schedule of Additional Modifications

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
				County Council in 2016, 2018 and 2020.
AM36	166	Paragraph 6.150	Amend paragraph 6.150 to read:  Recent assessment of the Protected Lanes and updates in Brentwood has confirmed that these features remain and in the majority of instances, the designation for protection is recommended for retention. One lane has been identified as at risk, partly due to damage as a result of its increased use as a cut through in the recent past when the Ongar Road suffered a major collapse, that is Sandpit Lane. The Council will be taking a watching brief on this lane, aware that some damage has already taken place. Brentwood Borough is therefore retaining the designation of all of the Protected Lanes with a review proposed for the next edition of the Local Plan-Two lanes, Back Lane and Sandpit Lane were identified by Essex County Council as no longer meeting the required criteria and have been removed whilst Chivers Road has been added as a Protected Lane.	Factual change to reflect assessments carried out by Essex County Council in 2016, 2018 and 2020.
AM37	166	Footnote 13	Add in new footnote  Protected Lane Assessment, Chivers Road, Additional Lane (2020), Essex County Council	Factual change to reflect assessments carried out by Essex County Council in 2020
AM38	168	Paragraph 6.158	Amend reference in paragraph 6.158 from Policy HP19 to BE16.	To reflect modifications to Policy references

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM39	170	Figure 7.1	Delete Figure 7.1	As it duplicates Figure 2.4
AM40	177	Figure 7.5	Amend final row of Figure 7.5 to read:33.76 ha to 45.96 ha 38.41 to 50.61 ha	Incidental amendment to reflect modifications to updated employment land requirement figures.
AM41	179	Paragraph 7.22	Amend Policy reference Policy PC03 to PC01	To reflect modifications to Policy references
AM42	185	Paragraph 7.46	Update reference of NPPF from 2018 to 2021	To reflect updated NPPF
AM43	188	Footnote 9	Amend Policy reference from PC11 to PC07	To reflect modifications to Policy references
AM44	194	Paragraph 7.65	Amend final sentence to read:  Developers should also refer to Policy BE17 BE13 Parking Standards and Policy BE16 BE12 Mitigating the Transport Impacts of Development.	To reflect modifications to Policy references
AM45	195	Paragraph 7.69	Delete paragraph 7.69	To remove text that is out of date.

#### Schedule of Additional Modifications

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM46	196	Paragraph 7.70	Amend first sentence of paragraph 7.70 to read:  The NPPF recognizes recognises that diversification is key to long-term vitality and viability of town centre, to 'respond to rapid changes in the retail and leisure industries	To correct grammatical error
AM47	205	Paragraph 7.99	Amend second sentence of paragraph 7.99 to read:  Development should seek to ensure that children and young people can walk or cycle to school safely on designated safe routes through new developments in line with Policy BE13 BE09 Sustainable Means of Travel and Walkable Streets, and Policy BE14 BE10 Sustainable Passenger Transport.	To reflect modifications to Policy references

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM48	215	Paragraph 8.32	Amend first sentence of paragraph 8.32 to read:  Trees, woodlands, hedges and hedgerows, wherever appropriate, should be incorporate <u>d</u> within a landscape scheme.	To correct grammatical error
AM49	222	Paragraph 8.56	Amend Policy reference from BE08 to BE05	To reflect modifications to Policy references
AM50	209	Paragraphs 8.11 to 8.12.	Amend paragraph 8.11 to read:  The borough contains three Sites of Special Scientific Interest (SSSI): Curtis Mill Green, Thorndon Park and The Coppice, in Kelvedon Hatch. Hutton Country Park is also a statutory Local Nature Reserve., The 2012 Local Wildlife Site Review identified while there are additionally 147 Local Wildlife Sites (LWS), identified for	Factual update and to correct grammatical error

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
			their value as semi-natural habitats and for their role in environmental education and public engagement with wildlife. In the Mill Green area, lies the Forest of Writtle, which is a designated Ancient Landscape. All these sites are important landscapes recognised for their special cultural, horticultural, historic and landscape qualities.	
			Amend paragraph 8.12 to read:  Other natural features of conservation interest include commons, small copses, trees, tree belts, woodlands, ponds and watercourses and hedgerows. Recreational impacts already pose a challenge to conserving these sites. Ancient hedged landscape of narrow lanes links historic farmsteads and hamlets in the Brentwood Ccountryside.	

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM51	All	Site allocation policy references	Re-number site policy references from R04 onwards.	To ensure the sequencing of site policy references is consistent following deletion of R18 and R20 and combining of R04 & R05 and R16 & R17.
AM52	244	Paragraph 9.3	Amend paragraph 9.3 to read:  Where reference is made to the type and size and of new homes, the local character should also be considered.	To correct grammatical error

#### Schedule of Additional Modifications

AM53	244	Paragraph 9.5	Amend paragraph 9.5 to read:  The trajectory is not fixed, it gives an indication to how we think things will development is expected to come forward within a phased approach and taking account of the ability to build in infrastructure	To correct grammatical error
AM54	243- 244	Paragraph 9.2 c.	Amend Policy reference from SP04 to MG05	To reflect modifications to Policy references
AM55	245	Paragraph 9.8	Amend NPPF reference from 2018 to 2021.	To reflect updated NPPF
AM56	260	Paragraph 9.27	Amend final sentence of paragraph 9.27 to read:  We want Dunton Hills to should become a community which sees itself as a 'conservation area of the future', not a dormitory 'non-place' that has become the norm for such developments in the recent past.	To correct grammatical error

### **Appendices**

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM57	N/A	Appendices	Amend sequencing of Appendices as follows:  Appendix 1: Local Development Plan Housing Trajectory  Appendix 2: Strategic and non-strategic policies and their relationship to the Strategic Objectives  Appendix 3: Monitoring Framework  Appendix 4: Schedule of Plans and Policies which will be superseded by the new Plan Appendix 5: Glossary	For presentation purposes.

AM58	379	Appendix 6 Footnote 6 Footnote 7	Insert the following definition of "Mineral Consultation Area" to Appendix 6 of the Plan:  Mineral Consultation Area: a geographical area based on a Mineral  Safeguarding Area, where the district or borough council should consult the  Mineral Planning Authority for any proposals for non-minerals development.	To reflect definition in the NPPF 2021
			Update the link to Public Health England's guidance at footnote 6.	To provide clarity
			Delete footnote 7.	To remove link to a document that is out of date.