



Brentwood Local Development Plan

Schedule of Potential Main Modifications Consultation Feedback Report

March 2022

1. Introduction

- 1.1 This report summarises the consultation undertaken by Brentwood Borough Council for the Schedule of Potential Main Modifications on the emerging Local Plan.
- 1.2 In addition to complying with the Regulations and where required the Coronavirus (Amendment) Regulations 2020¹, the Council has also complied with the provisions of its Statement of Community Involvement, published in December 2018. This sets out the Council's strategy for effective community participation in the planning process, including for a local Plan.
- 1.3 The consultation sought views on the below documents:
- Schedule of Potential Main Modifications, September 2021
 - Annexe 1 – (MM114) Appendix 1 - Local Plan Housing Trajectory
 - Annexe 2 – (MM116) Appendix 2 - Strategic and non-strategic policies and their relationship to Strategic Objectives
 - Annexe 3 – (MM117) Appendix 3 - Monitoring Framework
- 1.4 The following documents were published to support the consultation, comments on these documents were accepted:
- Sustainability Appraisal, September 2021
 - Habitats Regulations Assessment, September 2021
 - Proposed changes to the Submitted Policies Map
- 1.5 Further documents were added to the Examination Library following the week 6 hearing session held in July 2021. Comments on these documents were also accepted during the consultation:
- F81A Appendix 1 Housing trajectory update (August 2021)
 - F139 Brentwood Monitoring Report Housing Delivery 2020-21
 - F140A Five Year Housing Land Supply Statement as at 31 March 2021
 - F140B Five Year Land Supply Site Schedule as at 31 March 2021
- 1.6 The consultation ran for a 6 week period between 30 September 2021 to 11 November 2021. All comments received to the consultation can be viewed in full on the Council's local plan consultation portal, selecting 'Historic Documents', at <https://brentwood.oc2.uk>

2. Who we consulted

- 2.1 The Council has consulted extensively at all stages of preparing the Local Plan, to encourage the maximum level of feedback, this continued during the consultation of the Main Modifications.
- 2.2 The Council has consulted the following bodies and persons:
- Statutory bodies as set out in legislation, including Essex County Council, neighbouring Councils, local Parish Councils, National Highways, Natural England, NHS East of England Ambulance Service, Sport England, Transport for London,

¹ Applicable during the "relevant period" meaning the period beginning with 16th July 2020 and ending with 31st December 2021

Historic England, the Marine Management Organisation, the Environment Agency, amongst others.

- Local stakeholders, local businesses, voluntary and community groups.
- Developers and landowners and their agents.
- The public.

3. How we consulted

3.1 The consultation was available to view, download and comment on the Council’s website and the Council’s local plan consultation portal during the consultation dates.

3.2 A ‘Statement of Representation Procedure and Availability of Documents’ notice (see appendices) was published on the Council’s website, advising on the content of the consultation, consultation dates and how to respond.

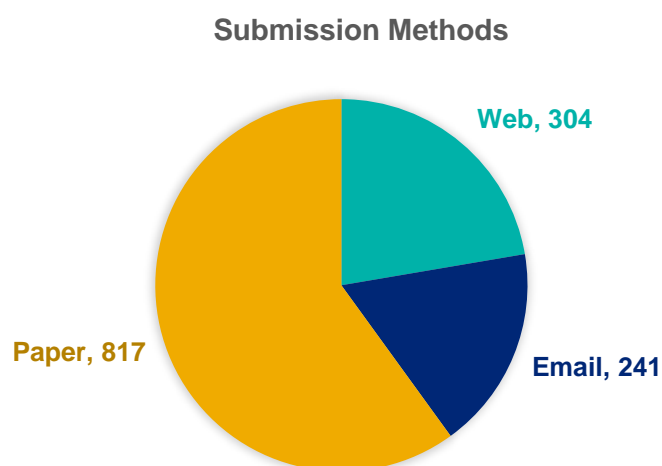
3.3 Temporary changes to Government Regulations² in response to Covid-19 removed the requirement to make hard copies of the consultation documents available.

3.4 The Council also sent direct emails/letter notifications to all consultees registered on the Council’s Local Plan consultation database and whom had previously responded to the Local Plan consultation.

4. Representations received

4.1 During the consultation there was a total of 1,362 representations made from 352 respondents; 87 representations were made in support and 1,275 raised an objection.

4.2 People were able to respond to the consultation in a number of ways – using the Councils local plan consultation portal, by e-mail, or in writing. People made their comments in the following way:



² [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

- 4.3 Whilst no formal petitions were received to the consultation, the vast majority of respondents were residents of Blackmore, with a smaller but significant number of respondents being residents of Priests Lane, Shenfield – an overview of the issues made follows below.

5. Main issues

- 5.1 The summaries below provide the Council's overview of the main issues raised in the consultation responses received to the Schedule of Potential Main Modifications.
- 5.2 The summaries do not seek to identify all the issues raised in the representations. Some respondents raised issues which do not relate to the specific modifications, these were outside the scope of the consultation and have not been summarised.
- 5.3 A separate feedback report sets out the main issues raised in representations to the Sustainability Appraisal (SA) (September 2021) and Habitat Regulations Assessment (HRA) (September 2021).
- 5.4 An overview of the main issues identified by the Council to the Schedule of Potential Main Modifications consultation are as follows:

Chapters 1-3 (MM1-2)

- A significant number of objections from the public in relation to the inclusion of housing allocation sites R25 and R26 in Blackmore. Inclusion of the sites is not considered by objectors to align with the Council's Strategic Objectives (MM2).

Chapter 4 (MM3-10)

- Amendments are requested from a site promoter that MM4 should be changed to include a housing requirement that reflects local housing need based on up-to-date Standard Method.
- A number of site promoters object to the use of a stepped housing trajectory, requesting the inclusion of additional site allocations to address shortfall against the proposed housing requirement, set out in MM4.
- Objections from the public in relation to the identification of Blackmore within Category 3 in the settlement hierarchy, set out in MM5.
- Support from the East of England Ambulance Service in respect of Policy MG04 (MM6) however request that the Inspectors review the MM to ensure funding via S106 or CIL is included for health services to meet population requirements.
- Essex County Council considers that the review policy MG06 (MM10) 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 Essex County Council, as set out in Hearing Statement F76A.
- Amendments are requested from site promoters that Policy MG06 (MM10) be changed to incorporate a commitment to progressing the Local Plan review to adoption, with an

appropriate timeframe set. A number of promoters request the policy wording be flexible to enable certain sites to come forward for development in the event the Council does not meet its own commitment.

- Amendments are requested from National Highways that Policy MG06 (MM10) paragraph D be modified.
- Objection from a site promoter to Policy MG06 (MM10), as the partial review does not include a commitment to meet full new employment land need.

Chapter 5 (MM11-34)

- A significant number of objections from the public in relation to MM14 and the inclusion of housing allocation sites R25 and R26 in Blackmore – it is considered by objectors the proposals will cause increased flood risk.
- Objections from site promoters to modifications to part B of Policy BE03 (MM15) 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.
- In their capacity as highways and transportation authority, amendments sought by Essex County Council in relation to Policy BE08 (MM22) with regards to definitions, clarifications and policy wording.
- Amendments are requested from site promoters that Policy BE08 (MM22) be subject to further modifications making clear that contributions to transport infrastructure will only be sought where they are directly related to development proposal and to make it acceptable in planning terms.
- Amendments are requested from National Highways that Policy BE08 (MM22) paragraph C be modified.
- Support from Essex County Council in that MM23 (deletion of policy BE12) does not prevent the ambition of offering a choice of travel modes and reducing the dependency on car use which can be addressed through Policies BE13 and BE17.
- In their capacity as highways and transportation authority, amendments sought by Essex County Council in relation to Policy BE12 (MM27) with regards to policy wording.
- Support from Sport England in relation to Policy NE05 (MM33).

Chapter 6 (MM35-55)

- Objections from site promoters to the revision of Policy HP01 (MM35) part C that seeks to reduce the threshold from 500 units to 100 or more dwellings where part a. and b. would apply, requiring provision for self-build homes and specialist accommodation respectively.

- Amendment requested from local estates group that a Main Modification is included for the insertion of Policy H15 from the 2005 Replacement Local Plan (or similar) which recognises the special character of the Hutton Mount estate.

Chapter 7 (MM56-71)

- Amendment requested by Essex County Council in relation to Policy PC01 (MM58), seeking additional supporting text to be provided that clarifies what is considered 'reliable evidence' as required in criterion A.b.
- Support for main modification MM69 from Sport England and Essex County Council.
- Various amendments requested by Essex County Council in relation to Policy PC11 (MM70), including additional paragraph regarding the availability of local vocational education and an additional paragraph in respect of special education needs.

Chapter 8 (MM72-82)

- Broad support for main modification MM74 from Natural England, however they have requested further amendments to the wording of Policy NE01.
- Support from Essex County Council as lead local flood authority are satisfied in principle with the amended policy for NE06 (MM78) Flood Risk. However, they seek amendments to wording in paragraph 8.57.
- A significant number of objections from the public in relation to MM78 and the inclusion of housing allocation sites R25 and R26 in Blackmore – it is considered by objectors the proposals will cause increased flood risk.
- A significant number of objections from the public in relation to MM81 and the inclusion of housing allocation sites R25 and R26 in Blackmore – it is considered by objectors' exceptional circumstances for Green Belt release at these sites has not been proven.

Chapter 9 (MM83-113)

- Objections from Essex County Council as the authority with responsibilities for education and childcare requirements for Dunton Hills Garden Village, seeking various amendments to wording in Policy R01 (MM84) to ensure education and childcare requirements are provided for on-site; and amendment to paragraph to include text on 'all through learning'.
- Various amendments are requested from Essex County Council that Policy R01 (MM84) requires further changes to ensure policy is sound, including text concerning 'Employment and Skills Plans', flood risk and 'movement corridors', amongst other matters.
- Confirmation sought from Natural England that omitted wording in Policy R01 (MM84) concerning details of securing the delivery of green infrastructure are to be added into the Dunton Hills SPD.

- Various amendments are requested from a site promoter that Policy R01 (MM84) requires further changes to ensure the policy is effective and clearer.
- Amendments are requested from Essex County Council to a number of main modifications as currently drafted to provide detail/guidance on what a 'quietway' cycle route is and their locations and what a transfer hub is and their locations.
- Amendments are requested from Essex County Council to a number of main modifications as currently drafted to ensure factual representation of current flooding position from the lead local flood authority.
- Objections from site promoters to the revision of policy R03 (MM87) concerning policy wording around the provision of self and custom build units.
- Support for main modification MM93 from Transport for London.
- Confirmation is sought from Essex County Council to a number of main modifications as currently drafted in respect of ensuring the retention of public parking spaces being sufficient to meet overall town centre public parking needs.
- Objection from a local resident seeking restoration of the submitted Plan's commitment to maintain the existing level of parking spaces across sites R11 (MM94), R13 (MM96) and R14 (MM97).
- Objections from the public in relation to MM101 and the inclusion of housing allocation sites R19 land at Priests Lane, Shenfield – concerns from objectors regarding traffic impacts generated by proposals on local and wider road network, amongst other issues.
- A significant number of objections from the public in relation to MM107 & MM108, concerning the inclusion of housing allocation sites R25 land north of Blackmore and R26 land north of Orchard Piece, Blackmore – disagreement from objectors expressed with the reinstatement of 70 dwellings (total). Concerns broadly relate to flooding, lack of infrastructure (roads, public transport, schools, doctors and amenities etc) and impact on the natural environment.
- Various amendments requested by Essex County Council in relation to Policy E11 (MM109), seeking changes in policy wording.
- Amendment requested from a site promoter in relation to Policy E11 (MM109), concerning site boundary and Green Belt release. Objections also raised with regards to contributions to improvements to infrastructure items named within Policy E10 (M111) and Policy E11 (M109)

Appendix 1 (MM114)

- Objection from site promoters that the Council should adopt the Sedgfield method when calculating 5 year housing land supply.

- Objection from site promoters in relation to the use of a stepped housing trajectory – amendments sought to allocate more housing land.

Appendix 3 (MM117)

- Support from Natural England however a request to amend some identified targets.
- Amendment requested from Essex County Council to include an additional policy to monitor – BE10 Sustainable Passenger Transport and BE12 Mitigating the Transport Impacts of Development, amongst other suggested amendments.

Policies Map

- Amendment requested from Natural England seeking a revision to show the Epping SAC ZOI.

6. How the comments have been used

6.1 All the representations received to the Schedule of Potential Main Modifications consultation were submitted to the Inspectors who have considered them when preparing their report. In some cases, this resulted in the Inspectors making amendments to the published main modifications. The final Schedule of Main Modifications is appended to the final Inspector's Report received by the Council on 23 February 2022. The further modifications made by the Inspectors in their final report are summarized below:

- MM10: Policy MG06 Local Plan Review and Update - amended wording of the policy to add 'Update' to accord with national policy and ensure it is justified, as it is clear an update is necessary. A consequential change was also made to MM116: List of strategic and non-strategic policies;
- MM51: Policy BE16 Conservation and Enhancement of Historic Environment - revised in relation to non-designated heritage assets to ensure consistency with national policy;
- MM57: Policy MG01 Spatial Strategy - employment requirement range adjusted from "33.76 to 45.96ha" to "38.41 to 50.61ha" to reflect revised evidence presented during the examination;
- MM74: Policy NE01 Protecting and Enhancing the Natural Environment - revised so that it effectively reflects the Essex coast recreational disturbance avoidance and mitigation strategy (RAMS) requirements, clarifies that a small part of the borough is within the Epping Forest Special Area of Conservation Zone of Influence, and removed reference to the Habitats Directive;
- MM85: Policy R01(II) Spatial Design of Dunton Hills Garden Village - revised to clarify that reference to public rights of way is to the network, which should be retained and enhanced. Also removed criterion 3 relating to the timing of education provision to make this effective and justified, as confirmed by Essex County Council; and

- MM119: New main modification inserting appendix to local plan which lists plans and policies to be superseded. This was made public prior to the first hearing session and discussed during the examination. Necessary to add as appendix to the plan as this is a legal requirement. The addition does not undermine the participatory process.

- 6.2 In light of the above further modifications made by the Inspectors in their final report, in relation to MM74, concerning clarification that a small part of the borough is within the Epping Forest Special Area of Conservation Zone of Influence; in order to comply with the legislation and give effect to the plan's policies, the Council will need to update the Policies Map to reflect this modification.
- 6.3 Receipt of the final Inspector's Report by the Council marks the end of the Examination process. The report concludes that the Local Plan is legally compliant and sound, subject to the appended main modifications. This means the Council can now formally adopt the plan.
- 6.4 The Council has taken into account all issues raised in response to the Schedule of Potential Main Modifications, the final Inspectors' Report as well as any necessary factual updates and corrections to prepare a Schedule of Additional Modifications to the Local Plan. 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. Together with the main modifications, the additional modifications will be incorporated into the adopted Local Plan. Please see the Schedule of Additional Modifications, March 2022, for the comprehensive list of additional modifications, a summary of which is given below:

- Genal changes to reflect the final document title and publication date.
- Make relevant grammatical changes, amend typographical errors and update weblinks.
- Update contents table, figures and policy numbering where required to reflect the modifications to the Local Plan.
- Delete specified text which is now outdated and is not relevant for Local Plan publication, for example the removal of reference to previous consultation stages.
- Amend reference from the NPPF 2018 to reflect updated NPPF 2021.
- Update use class references to align with the main modifications resulting from Use Class Order changes.
- Make incidental changes to specified supporting text/figures resulting from the main modifications.
- Make minor updates to specified sub-text to provide further information/clarity.
- Make relevant factual changes to specified supporting text, for example where legislation or supporting documents referred to in the text have been updated.
- Add the definition of 'Mineral Consultation Area' to the Glossary in Appendix 6.

7. Appendices

1. Statement of representation procedure and availability of documents
2. Notification letter and e-mail text
3. Representation form / guidance note
4. Main Modifications web page text

Statement of representation procedure and availability of documents

Brentwood Local Plan 2016-2033 Consultation on Schedule of Potential Main Modifications, September 2021

Planning and Compulsory Purchase Act 2004 Town and County Planning (Local Planning) (England) Regulations 2012

Title of document

The consultation is seeking views on the '**Schedule of Potential Main Modifications, September 2021**', incorporating:

- **Annexe 1 – (MM114) Appendix 1 – Local Plan Housing Trajectory**
- **Annexe 2 – (MM116) Appendix 2 – Strategic and non-strategic policies and their relationship to Strategic Objectives**
- **Annexe 3 – (MM117) Appendix 3 – Monitoring Framework**

Subject matter

The Brentwood Local Plan 2016-2033 was submitted to the Government on 14 February 2020 for examination.

A series of examination hearings overseen by independent planning Inspectors, Yvonne Wright BSc (Hons) Dip TP DMS MSc MRTPI and Mike Worden BA (Hons) Dip TP MRTPI, took place from 1 December 2020 to 29 July 2021. The Authority has now been invited by the Inspectors to consult on a schedule of main modifications to the Local Plan, required to make the Plan sound in the light of issues identified during examination.

The **Schedule of Potential Main Modifications**, September 2021, sets out a series of changes required to resolve issues that make the Local Plan unsound or where it is not legally compliant. These generally involve changes to policies and text that are essential to enable the Plan to be adopted.

The following documents have been prepared to support the proposed main modifications to the Plan.

- **Sustainability Appraisal, September 2021**
- **Habitats Regulations Assessment, September 2021**

Further documents have been added to the Examination Library following the week 6 hearing sessions held in July 2021. Comments on these documents will also be accepted.

- F81A Appendix 1 Housing trajectory update (August 2021)
- F139 Brentwood Monitoring Report Housing Delivery 2020-21
- F140A Five Year Housing Land Supply Statement as at 31 March 2021
- F140B Five Year Land Supply Site Schedule as at 31 March 2021

We have also published a number of **Proposed changes to the Submitted Policies Map** that have been required as a result of some main modifications.

Please note - this consultation is confined to the **Schedule of Potential Main Modifications** and above associated supporting documents. No representations should be made about parts of the Plan that are not proposed to be modified. Such representations will not be considered by the inspector. It is not necessary to repeat comments already made on other aspects of the Plan as these are already being considered by the Inspectors.

The main modifications are put forward without prejudice to the Inspectors' final conclusions and recommendations on the Plan.

Area covered by the document

Brentwood Borough

Consultation period

Representations on the Schedule of Potential Main Modifications and supporting documents are invited from noon on Thursday 30 September 2021 and will run for a 6 week period, ending at 5pm on Thursday 11 November 2021.

How to submit representations

The quickest and easiest way to make representations is via our Local Plan Online Consultation Portal at <https://brentwood.oc2.uk/>

Alternatively, a representation form can be downloaded from the website (<http://www.brentwood.gov.uk/local-plan-examination>) and responses emailed to planning.policy@brentwood.gov.uk

If you cannot use email, hard copies can be posted to:

MM Consultation 2021
 Planning Policy Team
 Brentwood Borough Council
 Town Hall, Ingrave Rd
 Brentwood,
 Essex, CM15 8AY

At the close of the consultation period, all duly made representations will be submitted to the Inspectors. Anonymous representations cannot be considered duly made.

The Inspectors will consider the representations and then set out their recommendations in a report.

Availability of documents

All the consultation documents are available to view and download on the Local Plan website at <http://www.brentwood.gov.uk/local-plan-examination>

Please note paper copies of the documents are not available; temporary changes to Government Regulations³ in response to Covid-19 have removed the requirement to make hard copies available.

Additional Supporting Documents

The following additional supporting documents are also made available for information purposes only on the Local Plan website www.brentwood.gov.uk/localplan:

- **Schedule of Potential Additional Modifications, September 2021**
- **Equalities Impact Assessment, September 2021**
- **Health Impact Assessment, September 2021**

Please note, the Schedule of Potential Additional Modifications, Equalities Impact Assessment and Health Impact Assessment do not impact the intent or interpretation of the Plan and are not required for soundness. They have been prepared by the Council and they do not form part of the Inspectors' examination of the Plan. They are made available for information purposes only and do not form part of the consultation and no representations should be made on them.

Further Information

For further information or advice, about the consultation documents and/or process, please contact the Planning Policy Team by email at planning.policy@brentwood.gov.uk or by telephone on 01277 312 500

³ [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

APPENDIX 2.



Date: 30 September 2021
Our reference: LDP/SEP/2021

Address 1
Address 2
Address 3
Address 4

Dear Consultee

Brentwood Local Plan: Notification of consultation on Schedule of Potential Main Modifications and accompanying updated Sustainability Appraisal and Habitats Regulations Assessment.

I am writing to you as a registered consultee on Brentwood Borough Council's Local Plan consultation database. Please be advised that in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012, the Council is publishing the above documents for consultation for six weeks from: **Thursday 30 September to 5pm Thursday 11 November 2021**

The Brentwood Local Plan 2016-2033 is undergoing an independent examination following its submission to the Government in February 2020.

Examination hearings took place from 1 December 2020 to 29 July 2021 under the direction of Planning Inspectors (Yvonne Wright BSc (Hons) Dip TP DMS MSc MRTPI and Mike Worden BA (Hons) Dip TP MRTPI).

The Authority has now been invited by the Inspectors to consult on a schedule of Potential Main Modifications to the Local Plan, required to make the Plan sound in the light of issues identified during examination.

The Schedule of Potential Main Modifications, September 2021, sets out a series of changes required to resolve issues that make the Local Plan unsound or where it is not legally compliant. These generally involve changes to policies and text that are essential to enable the Plan to be adopted.

The following documents have been prepared to support the proposed Main Modifications to the Plan.

- Sustainability Appraisal, September 2021
- Habitats Regulations Assessment, September 2021

Further documents have been added to the Examination Library following the week 6 hearing sessions held in July 2021. Comments on these documents will also be accepted.

- F81A Appendix 1 Housing trajectory update (August 2021)
- F139 Brentwood Monitoring Report Housing Delivery 2020-21
- F140A Five Year Housing Land Supply Statement as at 31 March 2021
- F140B Five Year Land Supply Site Schedule as at 31 March 2021

We have also published a number of proposed changes to the submitted Policies Map that have been required as a result of main modifications.

All the consultation documents are available to view and download on the Local Plan website at www.brentwood.gov.uk/localplan

How do I comment?

The quickest and easiest way to make representations is via our Local Plan Online Consultation Portal at <https://brentwood.oc2.uk/>

Alternatively, a representation form can be downloaded from the website (www.brentwood.gov.uk/localplan) and responses emailed to planningpolicy@brentwood.gov.uk

If you cannot use email, hard copies can be posted to: MM Consultation 2021, Brentwood Borough Council, Town Hall, Ingrave Road, Essex, CM15 8AY

Please note - this consultation is confined to the Main Modifications and associated supporting documents. **No representations should be made about parts of the Plan that are not proposed to be modified. Such representations will not be considered by the Inspectors.** It is not necessary to repeat comments already made on other aspects of the Plan as these are already being considered by the Inspectors.

Representations should focus on whether the Proposed Main Modifications are legally compliant and whether it is considered to meet the tests of soundness, as specified in the National Planning Policy Framework.

Data Protection

The Council has a duty to collect your information under the Town and Country Planning (Local Planning) (England) Regulations 2012 and any comments you make will be a matter of public record. Please note whilst all personal contact details will be treated as confidential, each comment and the name of the person who made them will be featured on the Council's website.

Your comments, including your name, address and contact details will be shared with the Planning Inspectorate and Programme Officer. Please advise us if you do not wish your information to be shared, however this means that your comments will be withdrawn.

By submitting a representation, you are agreeing to the above conditions.

Additional Supporting Documents

The following additional supporting documents are also made available for information purposes only on the Local Plan website www.brentwood.gov.uk/localplan:

- Schedule of Potential Additional Modifications, September 2021
- Equalities Impact Assessment, September 2021
- Health Impact Assessment, September 2021

Please note, the schedule of additional modifications, Equalities Impact Assessment and Health Impact Assessment do not impact the intent or interpretation of the Plan and are not required for soundness. They have been prepared by the Council and they do not form part of the Inspector's examination of the Plan. They are made available for information purposes only and do not form part of the consultation and no representations should be made on them.


Further Information

For further information or advice, about the consultation documents and/or process, please contact the Planning Policy Team by email at planning.policy@brentwood.gov.uk or by telephone on 01277 312 500

Yours sincerely

Phil Drane
Corporate Director, Planning and Economy

You can view Brentwood Council's privacy policy at www.Brentwood.gov.uk/privacy



Consultation on Potential Main Modifications to the Local Plan 2016-33

September 2021

REPRESENTATION FORM

This form should be used to make representations on the Main Modifications to the Brentwood Local Plan 2016-2033 submission version as contained within the Schedule of Potential Main Modifications and accompanying updated Sustainability Appraisal and Habitats Regulations Assessment.

The Schedule of Potential Main Modifications and all required supporting documents can be accessed via the Local Plan website at <http://www.brentwood.gov.uk/local-plan-examination>

Please note this form has two sections:

Section A – Personal information
Section B – Your representation

Please ensure you complete **both** parts of the form.

Where possible, we would prefer responses are provided using our Local Plan online consultation portal. This is the quickest and easiest way to make representations. To respond in this way, please follow this link: <https://brentwood.oc2.uk/>

Comments will be considered by the independent Planning Inspectors undertaking the examination.

All responses must be received by 5pm Thursday 11 November 2021

Please return forms either by attaching completed forms by email to planning.policy@brentwood.gov.uk or alternatively by post to MM Consultation 2021, Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY

Data Protection

All personal information that you provide will be used solely for the purpose of the Local Plan consultation. Please note whilst all addresses will be treated as confidential, comments will not be confidential. Each comment and the name of the person who made the comment will be featured on the Council's website.

By submitting this form, you are agreeing to the above conditions.

Guidance Note on Legal Compliance

The Inspectors have assessed whether the Plan meets the legal requirements under section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended (PCPA), which includes whether the Local Planning Authority has complied with the Duty to Cooperate (section 33 of the PCPA) when preparing the Plan, before moving on to test the Plan for soundness.

In relation to this consultation, comments regarding legal compliance should only be submitted where they relate to the potential Main Modifications.

Guidance Note on Soundness

Local Plans are required to be assessed against the tests of soundness. If you are objecting to a potential Main Modification, Question 3 of the representation form asks you to identify which of the below tests of soundness you consider the modification fails to address (soundness is explained in National Planning Policy Framework (NPPF 2021) paragraph 35).

Positively prepared - The Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified - The Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective - The Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

Consistent with national policy - The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

The preparation of the Local Plan has had regard to all policies in the NPPF.

However, insofar as your comments relate to the Main Modifications, you may take the view that the Local Plan:

- a) Fails to address a requirement of the NPPF; in this case you should explain what else it needs to include. Please note that the Local Plan does not need to repeat national policies; or
- b) Departs from national planning policies without good local reasons. In this case, please explain why.

Please keep in mind the information provided above to assist with correctly completing your comment form.

Section A: Personal Details	
Title	
First Name	
Last Name	
Job Title (if applicable)	
Organisation (if applicable)	
Address	
Post Code	
Telephone Number	
Email Address	

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

Please complete a separate sheet for each representation that you wish to make. You must complete 'Part A – Personal Details' for your representation to be accepted.

Representations cannot be treated as confidential and will be published on our Consultation Portal. Any representations that are considered libelous, racist, abusive or offensive will not be accepted. All representations made will only be attributed to your name. We will not publish any contact details, signatures or other sensitive information.

Full Name	
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Question 1: Which **Main Modification and/or supporting document** does your representation relate to?

Each Main Modification within the Schedule has a reference number. This can be found in the first column i.e. MM1, MM2

Any representations on a supporting document should clearly state which paragraphs of the document it relates to and, as far as possible, your comments should be linked to specific Main Modifications. You should avoid lengthy comments on the supporting documents themselves.

Representations on the Policies Map must be linked to specific modifications in that they reflect a change required as a result of a Main Modification.

Schedule of Potential Main Modifications	MM no.	<input type="text"/>
Sustainability Appraisal	para(s)	<input type="text"/>
Habitat Regulations Assessment	para(s)	<input type="text"/>
Policies Map or other supporting documents	Please specify	<input type="text"/>

Question 2: Do you consider this **Main Modification and/or supporting document**:

Legally Compliant?

YES

NO

Sound?

YES

NO

Question 3: If you consider the **Main Modification and/or supporting document** unsound, please indicate which of the soundness test(s) does it fail (please mark all that apply):

Not positively prepared

Not justified

Not effective

Not consistent with national planning policy

Question 4: Please provide details of either:

- Why you consider the **Main Modification and/or supporting document** to be sound or legally compliant; or
- Why you consider the **Main Modification and/or supporting document** to be unsound or is not legally compliant.

Please continue on a separate sheet if necessary

Question 5: Please set out what change(s) you consider necessary to make the **Main Modification and/or supporting document** sound or legally compliant, having regard to the matters that you identified above.

You will need to say why this change will make the Submission Version of the Local Plan sound or legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as accurate as possible.

Please continue on a separate sheet if necessary

APPENDIX 4.

Main Modifications

Details of the Consultation

Following the Examination Hearing Sessions for the emerging Local Plan, the Council has prepared a number of changes, known as Main Modifications, to the Brentwood Pre Submission Local Plan and Addendum of Focussed Changes to the Pre-Submission Local Plan to address issues of soundness and/or legal compliance identified by the Inspectors. These are put forward without prejudice to the Inspectors' final conclusions on the Plan.

Representations are invited on the Main Modifications and supporting documents only. The consultation will run for 6 weeks from noon Thursday 30 September 2021 to 5pm Thursday 11 November 2021.

The Schedule of Main Modifications and supporting documents can be viewed below.

A schedule of Additional Modifications has been prepared which are minor changes to the Plan and not those necessary for soundness. They do not form part of the Inspectors' examination of the Plan. The schedule of Additional Modifications is not being consulted on but is available for reference and can be viewed below.

How to make your representations

The quickest and easiest way to make your representations is via the **Local Plan Consultation Portal** (<https://brentwood.oc2.uk/>).

Alternatively, a representation form can be downloaded here (<https://brentwood.sharefile.eu/d-sd514335a1ba3426eadcdf21f201c9769>) and responses emailed to planning.policy@brentwood.gov.uk

If you cannot use email, hard copies can be posted to:

MM Consultation 2021
Planning Policy Team
Brentwood Borough Council
Town Hall, Ingrave Rd
Brentwood
Essex, CM15 8AY

Statement of Representation Procedure

The Council's Statement of Representation Procedure providing full details of the consultation can be accessed below:

Statement of representation procedure and availability of documents
(<https://brentwood.sharefile.eu/d-sa4f8366db7544562ab760db3e596fd32>)

Schedule of Potential Main Modifications

Schedule of Potential Main Modifications (<https://brentwood.sharefile.eu/d-s25091ca014b340899620c6bab240a478>) incorporating:

Annexe 1 – (MM114) Appendix 1 – Local Plan Housing Trajectory (<https://brentwood.sharefile.eu/d-s81fff942cc0c4c1e92d1326e8ee047fd>)

Annexe 2 – (MM116) Appendix 2 – Strategic and non-strategic policies and their relationship to Strategic Objectives (<https://brentwood.sharefile.eu/d-sdbaf54597e4148f19882b0e31466019a>)

Annexe 3 – (MM117) Appendix 3 – Monitoring Framework (<https://brentwood.sharefile.eu/d-sae6ddce18e6542cd921fb6a8572903c3>)

Proposed changes to the submitted Policies Map

Proposed changes to the Submitted Policies Map (<https://brentwood.sharefile.eu/d-s9e72c2ac2b27483e8a30beb7f7010e7d>)

Policies Map (large scale version) (<https://brentwood.sharefile.eu/d-s01b72bdc0b054bb8953884eec924ae5c>)

Supporting documents

The following documents have been prepared to support the Schedule of Potential Main Modifications to the Plan. Representations concerning their content will be accepted to the extent that they are relevant to inform your comments on the Main Modifications.

Sustainability Appraisal (September 2021) (<https://brentwood.sharefile.eu/d-s98b54a6b92a144e5a94a5a017cf21f36>)

Habitats Regulations Assessment (September 2021) (<https://brentwood.sharefile.eu/d-s894f3a657d8a446f966a3ede8e96c6cf>)

Further documents have been added to the Examination Library following the week 6 hearing sessions held in July 2021. Comments on these documents will also be accepted.

F81A Appendix 1 Housing trajectory update (August 2021) (<https://brentwood.sharefile.eu/d-sb685cfa85b5849c98173985b666c5644>)

F139 Brentwood Monitoring Report Housing Delivery 2020-21 (<https://brentwood.sharefile.eu/d-s307bde615c374861a8733bae129204ad>)

F140A Five Year Housing Land Supply Statement as at 31 March 2021 (<https://brentwood.sharefile.eu/d-s9affdf4278c43d29d80f1ede1097946>)

F140B Five Year Land Supply Site Schedule as at 31 March 2021 (<https://brentwood.sharefile.eu/d-s57f1d69dc67a42c69dc41d8a9e76fc8b>)

Additional documents

Schedule of Potential Additional Modifications (<https://brentwood.sharefile.eu/d-s60058397ef0848428def016313b2b696>)

Equalities Impact Assessment (<https://brentwood.sharefile.eu/d-s1bada481565747adaa8bd976abbd3a5b>)

Health Impact Assessment(<https://brentwood.sharefile.eu/d-sfcbdb342fc06423592174ff2fa74a887>)

It may be helpful to refer to the Pre-Submission Local Plan and Addendum of Focussed Changes to the Pre-Submission Local Plan alongside the Schedule of Main Modifications:

Brentwood Pre-Submission Local Plan
(<https://document.brentwood.gov.uk/pdf/31012019170028000000.pdf>)

Addendum of Focussed Changes to the Pre-Submission Local Plan
(<https://document.brentwood.gov.uk/pdf/10102019123257000000.pdf>)