

# ***Brentwood Local Plan 2016 - 2033 (Pre-Submission, Regulation 19)***

## ***Public Participation Report***

Chapter 1. Introduction

Brentwood Local Plan 2016-2033

<b><i>Representations</i></b>	<b><i>Nature</i></b>	<b><i>Summary of Main Issue/Change to Plan</i></b>	<b><i>Council's Assessment</i></b>	<b><i>Action</i></b>
<b><i>Chapter 1. Introduction</i></b>				
<b><i>Brentwood Local Plan 2016-2033</i></b>				
24077 - LaSalle Land Limited Partnership [8362]	Object	<p>Object to the omission of Honeypot Lane from the Brentwood Pre-Submission Local Plan. Honeypot Lane is a sustainable development location in close proximity and easy access and integration with new jobs, community facilities, services and greenspace as a principal tier 1 category settlement; it would contribute to the five year housing supply; it has already been tested by the Sustainability Appraisal.</p> <p><i>LLLP conclude that the Plan needs to be modified to identify and allocate Land at Honeypot Lane, Brentwood (ref: 022) for residential development of up to 250 new dwellings with associated transport, community and green infrastructure. The Brentwood Borough Local Plan: Pre-Submission, January 2019. Allocation of Honeypot Lane must include its removal from the Green Belt and the appropriate revision of the boundaries of that designated area. The Plan's proposed Housing Trajectory (Appendix 1), the Key Diagram and the list of proposed allocation sites should be updated to include Land at Honeypot Lane accordingly.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23096 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>Despite the engagement between Brentwood Council and neighbouring authorities, it is considered that not all information and assurances sought from Brentwood Borough Council have been provided and this brings into question the soundness of the rationale and choices made in the Brentwood Borough Local Plan. Many of the comments previously raised remain unanswered or inadequately addressed. It is uncertain how the Plan has been informed by this previous input.</p> <p>Document is not Sound</p> <p><i>Many of the comments previously raised remain unanswered or inadequately addressed. It is uncertain how the Plan has been informed by this previous input.</i></p>	Noted. The Council has been and will continue working with Basildon Borough within the Duty to Cooperate process to consider the wider impact of proposed Brentwood development.	No change.
24055 - Mr Terry Haynes [8359] 24056 - Mr Terry Haynes [8359] 24061 - Mr Terry Haynes [8359]	Object	<p>General Support for the plan and inclusion of "land rear of Mill House Farm, Hay Green Lane, Hook End, Brentwood, Essex, CM15 0NX" within the emerging Local Plan's proposed housing growth strategy helping to secure its residential allocation. Site is available and suitable, will help fulfil 5 year land supply, the green belt assessment shows it is suitable - is well contained, would not reduce significant gaps, has no specific countryside function and has no relationship with a historical town</p> <p><i>Ensure land rear of Mill House Farm, Hay Green Lane, Hook End, Brentwood, Essex, CM15 0NX is within the local plan.</i></p>	Noted.	No change.
22337 - Dr Philip Gibbs [4309]	Object	<p>The Local Plan was not positively prepared because the council was aiming to "protect" its borough from development by putting housing away from where it was really needed. Dunton Hills Garden Village is inappropriate.</p> <p><i>The strategic options need to be reassessed in the light of housing need throughout the borough rather than a desire to keep it away from villages and towns.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22265 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>ECC supports preparation of BBC Local Plan. Remain significant gaps in evidence base. Support for Plan can only be provided following completed to ECC satisfaction:</p> <ul style="list-style-type: none"> <li>a. appropriate transport evidence base to illustrate site specific, local and cumulative impact on local and strategic transport network, and to identify any infrastructure and/or mitigation measures required, together with costs and phasing;</li> <li>b. up to date Infrastructure Delivery Plan (IDP) including infrastructure costs, phasing, delivery and viability (need to be agreed with ECC as primary infrastructure provider); and</li> <li>c. clear references to evidence base within Plan to support spatial strategy, and Local Plan policies.</li> </ul> <p><i>BBC need to complete the following:</i></p> <ul style="list-style-type: none"> <li>a. <i>An appropriate transport evidence base, to reflect ECC's role as Highway Authority, that clearly illustrates the site specific, local and cumulative impact on the local and strategic transport network, and to identify any infrastructure and/or mitigation measures which would be required, together with costs and phasing;</i></li> <li>b. <i>An up to date Infrastructure Delivery Plan (IDP) that includes infrastructure costs, phasing, delivery and viability; and</i></li> <li>c. <i>Clear references to the evidence base within the Plan to support the spatial strategy, and the Local Plan policies.</i></li> </ul>	Noted	Consider accordingly
22234 - Mr Anthony Cross [4376] 22303 - Mr N McCarthy [6988] 24749 - Miss Harriet Davis [8440] 25396 - Mr & Mrs Michael & Valerie Lamont [8510] 25626 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921]	Object	<p>BBC fail to demonstrate that housing need cannot be met on previously developed land sites in existing urban areas or by increasing densities on other proposed allocated sites. BBC fail to demonstrate that there are no or insufficient previously developed sites outside the existing urban areas. That there are preferable green field sites available and more sustainable. R25 and R26 are unsuitable due to inadequate access, flooding, a disproportionate increase in housing stock and the development would not be sustainable.</p> <p><i>Remove R25 and R26 Blackmore from the local plan.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>1.1</i>				
24079 - LaSalle Land Limited Partnership [8362]	Object	<p>At Section 1 in paragraph 1.1 the BBLP establishes that the plan period is from 2016 to 2033 and indicates that the plan sets out how the Borough will develop over the next 17 years. Paragraph 22 of the National Planning Policy Framework (NPPF) (February 2019) states that: "Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure". [Our emphasis]. The BBC local plan will not have a minimum 15 year plan period at adoption which is anticipated to be 2020 at the earliest.</p> <p><i>The plan period for the BBLP should be modified to ensure that there is a minimum 15 year period from the date of adoption.</i></p>	Noted	No change
22603 - Cllr. Andrew Watley [4869]	Object	<p>I object to sites R25 and R26 within the LDP. Not chosen for good planning protocols, but convenient due to developers lined up. At last LDP iteration - inappropriate to develop in the villages due to a lack of infrastructure. Nothing changed.</p> <p>The scale of 70 new houses in a village of 350 houses is totally out of proportion - will change character. Poor access. Flooding risk to village increased. Lack of good transport links. Blackmore School at capacity - would force pupils out of the area. No 'very special circumstances' to warrant building on greenbelt.</p> <p><i>Taking out R25 and R26 as potential developments.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Plan Period and Review</i>				
23662 - M Scott Properties Ltd [8054] 23690 - Catesby Estates Plc. [7463] 23698 - BPM Investments Ltd [8338] 23829 - Strutt & Parker LLP (Mr Alasdair Sherry) [6713] 24064 - Countryside Properties [250] 24107 - Marden Homes Ltd [8363] 24164 - Turn2us [6753]	Object	<p>The proposed PSLP period runs until 2033. Assuming, optimistically, adoption in 2019, this means that the Local Plan will address development needs for a maximum of 14 years. The NPPF (paragraph 22) is clear that strategic policies should look ahead over a minimum of 15 years from the date of adoption. This deficiency in the PSLP is of particular relevance given that the Borough is predominantly Green Belt, and failure to ensure that development needs are planned for over a sufficient period of time would likely result in an early review of</p> <p><i>Paragraphs 1.1 - 1.5 of the PSLP and all references throughout the PSLP including supporting text and Policies should be amended to refer to a period of at least 15yrs from date of adoption. It is suggested that this be at least 2016 - 2035. Policies SP02; HP07; and PC02 should be amended to refer to a minimum of 15yrs from date of adoption with all housing and land requirements adjusted accordingly</i></p>	Noted	No change
<i>Plan-Making Process and Next Step</i>				
24769 - Miss Abigail Dawson [8443] 24889 - Mr Marcus Forstner [8160]	Object	<p>The local population should take part in a survey. Other lands which are more suitable should be investigated further. Flood risk survey. Local residents have not been asked or consulted properly. Local councils have not been consulted. Lack of information, lack of strategy.</p> <p><i>remove R25 and R26 from the plan</i></p>	Noted	No change
<i>Local Plan Regulation 19 Stage</i>				
22761 - Mr Geoffrey Town [3982]	Object	<p>This Comment form is an example of how not to 'comply with the Duty to Cooperate' i.e. not in plain English but more like Yes Minister script. No more houses.</p> <p><i>Remove R25 and R26 from plan</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Duty to Cooperate</i>				
23287 - West Horndon Parish Council (Mr Kim Harding) [381]	Object	<p>The Parish Council's representations dated 22nd March 2016 to the Draft Local Plan raised a number of issues. It is the opinion of the Parish Council that the points made have not been addressed; indeed very little has changed in the Reg 19 Plan in light of representations made by any parties. The Parish Council wishes therefore to make clear that the representations it made on the Draft Local Plan are still outstanding and still represent matters that require addressing for the Reg 19 Plan to be considered to be sound.</p> <p><i>CHECK - Infrastructure and issues relating to DHGV and impact on West Horndon.</i></p>	Noted	No change
23668 - Gladman Developments [2774]	Object	<p>Welcomes South Essex Joint Strategic Plan but disappointed that this will not allocate specific sites but this will be left for the individual local plans to take forward. There is therefore an immediate need to address this situation; and for Local Plans to have to await the adoption of the JSP before sites are taken through the Local Plan process and finally released from the Green Belt, is simply going to result in inevitable further delay.</p> <p><i>A stronger reference to the Joint Strategic Plan is needed to improve Duty to Cooperate and improve housing delivery.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23124 - Thurrock Borough Council (Mr Richard Hatter) [2461]	Object	<p>Whilst in all other respects the Brentwood Plan appears to meet legal requirements it is considered by Thurrock Borough Council that the Duty to cooperate requirements have not been fully complied with in particular with regard to development of the evidence base and the lack of proper response and agreed outputs by Brentwood Council for evidence and a response on Dunton Hills Garden Village (DHGV). Thurrock Council considers that there are key strategic issues and cross-boundary matters of importance in relation to the preparation of the Brentwood Local Plan that remain outstanding and should be addressed through further effective engagement and collaboration between Brentwood Council and Thurrock Council and with the other South Essex authorities under the Duty to cooperate. The key matters include:</p> <ul style="list-style-type: none"> <li>* Confirmation of the Brentwood Objectively Assessed need and whether the borough can accommodate its need;</li> <li>* The spatial strategy and alternative options within the A12 and A127 corridors to accommodate the growth;</li> <li>* The Thurrock Council concerns regarding the justification of Dunton Garden Village and the need to consider alternative options including at West Horndon;</li> <li>* Transport and other infrastructure Issues;</li> <li>* Further development of the Brentwood Local Plan evidence base;</li> <li>* The development of the South Essex Joint Strategic Plan and evidence.</li> </ul> <p>In particular in recognition of the Thurrock concern about Dunton Hills Garden Village and due to its location close to and adjoining the boundaries between the two authorities Thurrock Council requests further engagement on this development and considerations of alternative options along the A127 Corridor and elsewhere.</p> <p><i>To ensure more effective collaboration and joint working it is suggested that Brentwood Council should progress key strategic matters through the South Essex Joint Strategic Plan process as well as with individual local authorities on cross-boundary matters. Brentwood Council will need to consider how much additional evidence base for housing need and capacity can be prepared in partnership with adjoining authorities and the other South Essex authorities. In addition to the preparation of the SGLS study which includes a high level housing land and capacity</i></p>	<p>Noted. The Council has been and will continue working with neighbouring planning authorities within the Duty to Cooperate process to consider the wider impact of proposed development.</p>	<p>Consider accordingly. No change.</p>

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		<p>assessment, the South Essex authorities are in the course of commissioning of additional elements of evidence base to support the preparation of the joint strategic planning including a review of the South Essex SHMA, a Strategic Green Belt review and further infrastructure studies.</p> <p>The outcome of these studies and the preparation of the joint strategic planning will have implications for the nature and scale of housing provision across South Essex including Brentwood and the future approach to be taken in the Local Plan.</p> <p>Section 3.6 of the Brentwood Local Plan should identify the key cross-boundary issues and challenges between Brentwood and adjoining authorities including Thurrock. It should set out how the plan seeks to address these including any future reviews of the plan and through joint working on the South Essex JSP.</p> <p>Brentwood Council should prepare Statements of Common Ground on strategic cross- boundary matters in accordance with the requirements of the National Planning Policy Framework and Planning Policy Guidance.</p> <p>Notwithstanding any additional text to the plan setting out key cross-boundary issues it is considered that the Duty to Cooperate has not been met as Brentwood Council has not undertaken effective and on-going engagement regarding the Dunton hills Garden village. The Brentwood Pre-Submission Local Plan has also therefore not been prepared with a positive and justified strategy.</p>		



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23971 - Bellway Homes and Crest Nicholson [8351]	Object	<p>Basildon's [Brentwoods?] failure to allocate sufficient sites to meet housing needs will impact the other ASELA partners (e.g. increased unmet needs in the region). This should be addressed as a matter of urgency through Brentwood and Basildon's Duty to Cooperate Statements of Common Ground. A Duty to Cooperate position statement is welcome, although the MOU with the ASELA is insufficient to evidence the detailed Duty to Cooperate matters that need to be addressed with Basildon. At present the current policy position does not ensure an integrated approach to delivery of the Garden Village and adjacent sites to the West of Basildon.</p> <p><i>Document is not Sound. Document does not comply with duty to cooperate</i></p>	Noted. The Council has been and will continue working with neighbouring planning authorities within the Duty to Cooperate process to consider the wider impact of proposed development.	No change.
22472 - Hallam Land Management Limited [8258] 23651 - Countryside Properties [250] 23948 - CEG Land Promotions Limited [5050]	Object	<p>We find the Local Plan to have failed Duty to Cooperate. However, the Joint Spatial Plan will be an important document that encompasses several local authorities that are struggling to meet their growth needs. It provides the opportunity to address the need for housing in the context of a probable shortfall across the South Essex Strategic Housing Market Area. Through the DtC procedure, Thurrock could contribute towards meeting any unmet housing needs from Brentwood within a proposed new settlement on land at Thurrock, centred on West Horndon, as proposed in Thurrock's emerging Local Plan. This is a feasible alternative.</p> <p><i>The SA and evidence base do not support the spatial strategy for growth set out in the Local Plan. The Local Plan process should be suspended to allow a fundamental review of the SA.</i></p>	Noted. The Council has been and will continue working with neighbouring planning authorities within the Duty to Cooperate process to consider the wider impact of proposed Brentwood development.	No change.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24008 - Croudace Strategic Ltd [2656]	Support	It is evident that BBC has engaged with neighbouring authorities regarding cross-boundary matters as well as meeting housing need, as set out in the Duty to Co-operate Brentwood Position Statement (February 2019). The Council needs to continue to have regard to neighbouring authority plans and adequately co-operate with neighbouring authorities, rather than awaiting the future joint strategic plan, as well as Essex County Council plans, and strategies of other relevant bodies.  <i>No change proposed</i>	Support noted	No further action
23173 - Chelmsford City Council (Ms Gemma Nicholson) [8305]	Support	BBC and CCC have engaged on strategic cross boundary matters. A Protocol for dealing with unmet housing needs requests has also been agreed between Essex Local Planning Authorities through the Essex Planning Officers' Association which has resulted in an effective joint mechanism being put in place. Furthermore, both Councils have also been involved in a joint the Gypsy, Traveller & Traveller Showpeople Accommodation Assessment with relevant other Essex Local Planning Authorities. CCC consider that the Duty to Co-operate has been fulfilled and will continue to work collaboratively where appropriate with BBC through the Duty to Co-operate  <i>No change proposed</i>	Support of plan and continued collaborative working noted	No further action
23275 - c2c Rail (Chris Atkinson) [8280] 23280 - c2c Rail (Chris Atkinson) [8280]	Support	We strongly welcome the positive engagement we have had from the council's officers on this issue to date. Given the projected housing numbers reported in the region, our contractualised route capacity will be exhausted by 2025. Trenitalia UK is currently developing an Outline Business Case for the Department for Transport for an investment in ETCS Level 2. As the ASELA are undertaking a joint approach to strategic planning and are considering an application to central government for a Growth Deal, we urge the Council to support the inclusion of our scheme in this strategy, and identify funding sources across the region that can be used to contribute to the capital and net operating costs of the proposal.  <i>No change proposed</i>	To note the ASELA strategic approach and C2C rail needs.	The projection is noted and will be considered within IDP and plan.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23094 - Basildon Borough Council (Mr. Matthew Winslow) [369] 23110 - Castle Point Borough Council (Mr Ian Butt) [8304] 23187 - Southend on Sea Council (Mr Adrian Smith) [8307] 23308 - Greater London Authority (Mr Jörn Peters) [6093]	Support	A major step forward for effective cooperation has been the Memorandum of Understanding that was signed between Basildon, Brentwood, Castle Point, Essex County, Rochford, Southend-on-Sea and Thurrock Councils to form the ASELA. The Council has noted Brentwood Council's commitment in paragraph 1.13 to work as a member of ASELA on a process to develop a long-term growth ambition. The Council fundamentally supports this policy approach as meeting the soundness tests of being a) effective and b) in accordance with national policy.  <i>No specific amendment proposed</i>	Support of the commitment within ASELA is noted	No further action
<hr/>				
<i>1.13</i>				
22371 - Rochford District Council (Planning Policy) [4178]	Support	The Council acknowledges that Brentwood Borough Council is a fellow member of the Association of South Essex Local Authorities (ASELA) and, as a result, is committed to the preparation of a South Essex Joint Strategic Plan (JSP).  <i>No change</i>	Support noted	No further action
<hr/>				
<i>1.15</i>				
22538 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	Please include reference to the Thames Chase Plan. The overarching strategy for the Thames Chase Community Forest.  <i>Please include reference to the Thames Chase Plan. The overarching strategy for the Thames Chase Community Forest.</i>	Support welcomed.	Consider including reference to the Thame Chase Plan.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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*Evidence Base*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23880 - Ms. Isobel McGeever [7286]	Object	<p>Paragraph 10.6 of the IDP outlines that Brentwood has a slightly higher proportion of over 65s compared to Essex county, with a 17% increase expected between 2015 and 2025 equating to 2,600 more people. Therefore, there will be a greater need for housing which can accommodate people's changing needs. Paragraph 10.19 also states that hospitals will need to be redesigned to treat the patients of the future. The Brentwood Community Hospital could be suitable for housing for older people as its location is sustainable.</p> <p><i>Should any part of the Brentwood Community Hospital site be declared as surplus to the operational healthcare requirement of the NHS in the future, then the site should be considered suitable and available for alternative use, and considered deliverable within the period 5-10 years. These representations identify the sites potential for future development, in accordance with the realignment of the Green Belt so that this significant area of development land is no longer included. It is evident, that the site does not make a positive contribution towards the purposes of the Green Belt set out in the NPPF. Accordingly, redevelopment of the site could provide a key contribution to Brentwood's housing need, which the Council have failed to justify, given the reliance on key strategic sites, and the lack of acknowledgement for unmet need arising from neighbouring authorities (Basildon and Havering). These representations therefore promote and identify parts of the Brentwood Community Hospital site as a suitable site to contribute towards these requirements. This site presents an excellent opportunity for a high quality residential redevelopment on previously developed Green Belt land. This could be achieved without compromising the character of the area as the development can act as an infill site to the existing residential development surrounding it, and without the need for significant infrastructure. Furthermore, the site is also available to accommodate further health related development should the CCG seek to expand their services in this location, including the possible expansion of the hospital to provide more comprehensive services for the community. However, the site's Green Belt designation would make it difficult for any planning application proposing</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>additional built form to provide further healthcare services to be considered acceptable. The subject site is considered available, suitable and deliverable within the 5-10 year period of the plan.</i>		
23658 - EA Strategic Land LLP [279] 24060 - Mr Terry Haynes [8359]	Object		The sites of West of Thorndon Avenue and the land at rear of Mill House Farm should therefore be added to the plan.	
		<i>Add land at rear of Mill House Farm to plan</i>		
23742 - St Modwen Properties PLC [5124] 23743 - St Modwen Properties PLC [5124]	Object	The transport assessment methodology forecasts future demand based predominantly on historic trends, it does not fully account for the likely demand suppression that will occur due to worsening traffic congestion. Additionally, emerging internet based services and demand responsive public transport are likely to further change the way that people choose to travel. Consequently, the forecast cumulative traffic demand on the road network should not be interpreted as the likely outcome of the Local Plan site allocations. Instead it should be considered as an indicator of overall travel demand to inform future policy to avoid 'worst case scenario'. The trip generation forecast for Brentwood Enterprise Park (BEP) used in the Local Plan transport assessment is based on the site having an employment capacity of approximately 3,000 jobs, which is considered to be an over estimate. Based on industry standard employment densities for the likely mix of business uses on the BEP Site, the employment capacity is forecast to be approximately 2,000 jobs. Therefore, the Local Plan transport assessment overestimates the likely trip generation for BEP by as much as 50%.	Noted	No change
		<i>No specific change proposed</i>		
23866 - Brentwood School [2575]	Object	The Green Belt evidence base has not been finalised with the Green Belt Study, Parts 1 and 2 still working drafts with particular consideration to the Area Appraisal for Site Assessment 55 East of Middleton Hall Lane. The evidence base does not conclude what is practically on the ground and the purposes of Green Belt which are considered to be assessed.  <i>The Local Authority should finalise its Green Belt Evidence Base.</i>	Noted	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24112 - Marden Homes Ltd [8363]	Object	<p>The assessment of site in the Green Belt and their relative contribution to the Green Belt purposes in the Green Belt Study (November 2018): certain elements of the assessment are incorrect and are not a true reflection of Hanging Hill Lane site's characteristics (site 284). The weaknesses and inconsistencies recognised in the individual site assessments made, again demonstrate a flaw in the evidence base for the Local Plan and could again result in the unjustified omission of Green Belt sites from consideration for allocation as part of the new Local Plan.</p> <p><i>Update Green Belt assessment</i></p>	Noted	No change
23717 - BPM Investments Ltd [8338]	Object	<p>Strategic Green Belt Assessment (SGBA) assesses Green Belt parcels rather than a more fine-grained approach; therefore this assessment is less helpful when assessing smaller sites that are well associated with the urban area, such as Salmonds Grove. Part 3 Green Belt Appraisal considers specific sites, but in limited detail. The findings of the Green Belt Appraisal produced for Salmond Grove site (076a&amp;b), which considered the site in far greater detail than the Council's Part 3 Green Belt Appraisal, have not been taken into account.</p> <p><i>A more fine-grained approach should be undertaken.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23642 - Countryside Properties [250] 23643 - Countryside Properties [250] 23644 - Countryside Properties [250]	Object	The document "Dunton Area Landscape Corridor Design options Local Plan Green Infrastructure" in 2017 commissioned jointly by Basildon District Council and Brentwood Borough Council was not included as part of the evidence base. A key finding of this assessment was that landscape mitigation works required would crucially not leave sufficient land for development to accommodate 2,500 new homes at that time proposed in the Draft Plan for Dunton Hills Garden Village, let alone the potentially higher figure of 4,000 beyond the plan period.	Noted. The 2017 landscape corridor work is not fit for purpose. The document was drafted without accepting the proposed quantum of development for DHGV. This was made clear at the outset of commissioning the report and throughout the process of drafting but despite this the authors repeated ignored this fundamental requirement ie that the report was to assess options for a landscape corridor with the proposed quantum of development within both boroughs. Whilst the report has some interesting ideas, the fundamental scale of proposals are inappropriate. It is noted that the Joint Dunton Area Landscape Corridor Design Options 2017 will form part of the Duty to Cooperate documents. The Council will continue the process of duty to cooperate with neighbouring boroughs, in particular to continue the development of the Dunton Masterplan Framework.  Further detailed assessments are set out in the Masterplan Framework which Basildon have been a stakeholder in providing detail along the landscape corridor.	No change.
<i>The SA and evidence base do not support the spatial strategy for growth set out in the Local Plan. The Local Plan process should be suspended to allow a fundamental review of the SA.</i>				



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23290 - West Horndon Parish Council (Mr Kim Harding) [381] 23291 - West Horndon Parish Council (Mr Kim Harding) [381] 23293 - West Horndon Parish Council (Mr Kim Harding) [381] 23294 - West Horndon Parish Council (Mr Kim Harding) [381]	Object	<p>The Transport Assessment is not sufficiently robust, not in line with NPPF, capacity and highway safety considerations have not been adequately completed or aligned. It only focuses on specific junctions and requirements of growth in the Local Plan and neighbouring districts but fails to take into account the cumulative impacts of traffic from beyond the neighbouring authorities; whereas ECC's 2014 Economic Plan assesses the A127 from Southend to the M25 and shows that almost along its entirety, the A127 is close to or above capacity, note that the levels of growth being planned for has increased since 2014. The Transport Assessment identifies a total of 8 junctions that require significant mitigation across the borough. The Brentwood Infrastructure Delivery Plan (IDP) schedule gives a 'headline estimate' of £4m for improvements. Unlikely that it will cost an average of just £0.5m per junction for the mitigation measures at these junctions. It is not only mitigation at junctions which is required but solutions to expand capacity on the A127 itself. The success of the strategy is predicated on this modal shift yet nowhere in the evidence base does it suggest what the required increases in rail and bus patronage, cycling and walking are. In assessing sustainable modes of travel, the Transport Assessment makes reference to Department for Transport (DfT) evidence which based output on extremely dated evidence sources framed within a totally different historical policy context. Even if one does take the lessons learned from this historical evidence, the ability to affect significant modal shift in Brentwood borough is expected by the Transport Assessment to be very limited.</p> <p><i>No specific change is proposed.</i></p>	Noted. Evidence base provision is considered in line with NPPF requirements and is therefore considered proportionate. The Council will be ensuring appropriate updates to the local plan evidence base for submission as appropriate.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23718 - S&J Padfield and Partners (SJP) [6122]	Object	<p>No Policies Map has been published despite Appendix 4 setting out that maps detailing various changes, including Green Belt boundary amendments, will be provided for Regulation 19 consultation and there will be a combined policies map. The Policies Map is an important aspect of the Local Plan and should be published to provide clarity over the Green Belt boundaries to ensure these are clearly defined for all parties and that it can be protected from inappropriate development in accordance with Policy NE9 and the NPPF.</p> <p><i>The Policies Map should be published for affected parties to comment on if necessary, making the plan clear and effective.</i></p>	Noted.	Publish Policies Map.
22638 - Countryside Properties [250]	Object	<p>There is insufficient evidence to demonstrate that the Local Plan housing requirement can be met by the spatial strategy for growth proposed in the Draft Local Plan. Countryside Properties (UK) Ltd are promoting land at West Horndon which the SA to the Local Plan identifies as remaining in contention to deliver strategic growth in the Borough. Further debate is required as to whether the Plan is sound and legally compliant given that it does not have a SA that fully supports the spatial strategy for growth proposed nor is it able to dismiss land at West Horndon, as a reasonable contender for allocation through the Local Plan.</p> <p><i>The Local Plan process should be suspended to allow a fundamental review of the SA.</i></p>	Noted	No change
22610 - Miss Monica Eades [8288]	Object	<p>Evidence base flawed. Transport Assessment did not include traffic along Priests Lane. Done at a time which did not include greatest flow of school traffic. Impact of increase in traffic from the proposed development in Shenfield and impact of Crossrail have not been taken into account.</p> <p><i>The land at Priests Lane (R19) should be removed from the Local Development Plan.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23708 - BPM Investments Ltd [8338]	Object	Strategic Green Belt Assessment (SGBA) assesses Green Belt parcels rather than a more fine-grained approach; therefore this assessment is less helpful when assessing smaller sites that are well associated with the urban area, such as Salmonds Grove. Part 3 Green Belt Appraisal considers specific sites, but in limited detail. The findings of the Green Belt Appraisal produced for Salmond Grove site (076a&b), which considered the site in far greater detail than the Council's Part 3 Green Belt Appraisal, have not been taken into account.  <i>A more fine-grained approach should be undertaken.</i>	Noted	No change
23300 - West Horndon Parish Council (Mr Kim Harding) [381] 23302 - West Horndon Parish Council (Mr Kim Harding) [381]	Object	The Reg 19 Plan is not accompanied by a Level 2 SFRA. Without this, the Plan is not sound because it has not been justified and is not consistent with national policy and the SA has failed to properly consider alternative sites at a lower risk of flooding and the evidence supporting the Reg 19 Plan has failed to properly demonstrate that the level of growth proposed for DHGV can be accommodated on the site in areas with a low probability of flooding. The Reg 19 Plan is not sound because national planning guidance in respect of the approach to taking flood risk into account in the preparation of a local plan.  <i>No specific change proposed.</i>	Noted	No change
24253 - Mr Jeffrey Goodwin [5004]	Object	The councils lack of professionalism is certainly outstanding, as no-one can trust your facts without checking. For better information and accurate facts, rather than Brentwood Councils waffle visit <a href="http://WWW.DUNTONEXPLOITATION.CO.UK">WWW.DUNTONEXPLOITATION.CO.UK</a>  <i>Remove DHGV from plan</i>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23850 - Strutt & Parker LLP (Mr Alasdair Sherry) [6713]	Object	<p>The Green Belt Assessment did not assess each individual site but rather undertaken based on parcels. Therefore the assessment of the four green belt assessments is not accurate. The key issues to consider include: * Whether all potential sites' impact on the Green Belt has been assessed; * Whether such assessment was undertaken at a sufficiently fine grain to properly consider individual sites' impact on the Green Belt. Not all potential development sites were subject to a sufficiently detailed analysis which could enable BBC to justifiably conclude it has identified a reasonable strategy to meet its housing needs. Land to the South of the B1002, Ingatestone, was not properly assessed.</p> <p><i>No specific change was proposed</i></p>	Noted	No change
23095 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>Fundamental evidence has been 'in development', but not published during much of its preparation. This includes the entire Green Belt Review, Housing and Economic Land Availability Assessment, Landscape Sensitivity and Capacity Study, Local Plan Viability Assessment and Transport Assessment which were not published until the month before Brentwood Council considered the Publication Local Plan in November 2018. This has created a lack of transparency during critical plan-making stages and contributed to the scale of representations from Basildon Council for its Regulation 19 response.</p> <p><i>No specific amendment proposed.</i></p>	Noted. The Council has been and will continue working together with Basildon Borough Council under Duty to Cooperate to ensure information sharing continues.	No change
24068 - Countryside Properties [250]	Object	<p>The Green Belt Study (November 2018) provided an assessment of Green Belt parcels against the five purposes of the Green Belt, assessed site 030A as having a moderate overall contribution to the Green Belt, despite the favourable assessment of the site. We have outlined that these elements of the assessment are incorrect and not reflective of the sites true characteristics. The weaknesses and inconsistencies recognised in the individual site assessments made demonstrate a potential flaw in the evidence base for the Local Plan and could result in the unjustified omission of Green Belt sites from consideration for allocation.</p> <p><i>Update Green Belt evidence base</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24397 - Chelmsford Diocesan Board of Finance [2627]	Object	<p>Belt: A Part 3 Green Belt Appraisal (dated 31st January 2019) has been published by the Council. This considered specific sites, albeit in limited detail. Site 033 has been discounted, with the assessment explaining: 'based on the progressive findings of the HELAA and wider evidence base, a selective approach to the assessment of additional has been undertaken. Overall, Sites (located within the Green Belt) which have been discounted for other environmental or strategic reasons (i.e. too small to form a strategic allocation), were not considered for further assessment.' Whilst the assessment has justified Site 033 (and other sites) being omitted from the assessment, the study assesses the significance of each site's contribution to four of the five purposes of the Green Belt, with an understanding the fifth purpose is implemented as an integral part of the Brentwood Local Plan. As such, previous findings contained in the HEELA and environmental / strategic constraints, unless explicitly relating to the four purposes of the Green Belt, should not be used for justifying site omission. With regards to Site 033, this is especially pertinent when considering the ambiguity of weight given to various SA scores (i.e. distance to GP and interaction with the Conservation Area) and the inaccuracy of availability in the HEELA (2018). Even were it appropriate to use such criteria to discount sites from a Green Belt assessment, the criteria itself in the case of the above has proven inaccurate, overly simplistic and therefore unreliable.</p> <p><i>We recommend the land to the south of Lodge Close, Hutton is assessed within the Council's Part 3 Green Belt assessment as a suitable, deliverable and available site. As an overarching point, we are concerned with the simplistic approach that appears to have been taken in considering the contribution sites make to the purposes of the Green Belt. We would therefore recommend that the Council provide a far more detailed and robust review of sites' contribution to the purposes of the Green Belt as part of the plan-making process. As part of any residential allocation, we would look to undertake further technical evidence to support the site's release from the Green Belt.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23143 - Thurrock Borough Council (Mr Richard Hatter) [2461]	Object	<p>Thurrock Council has previously made representations on the Brentwood Local Plan at the draft 2016 Local Plan consultation and the 2018 Preferred Site Allocations regarding the lack of sufficient evidence base to support the policies and proposals in the emerging Local Plan.</p> <p>It is recommended that specific additional evidence base required includes:</p> <ul style="list-style-type: none"> <li>* An updated SHMA to take account of the Government policy requirements not to use the 2016-based household projections;</li> <li>* Further evidence to have assessed the various spatial growth options;</li> <li>* A more fully developed transport evidence base that includes cumulative and site specific impacts of development on the local and strategic highway network and to identify further infrastructure and /or mitigation measures required together with costing and phasing;</li> <li>* An up to date Infrastructure Delivery Plan (IDP) that includes infrastructure costs, phasing, delivery and viability.</li> </ul> <p>Changes to Plan:</p> <p>It is considered the Brentwood Draft Local Plan and supporting evidence base will require further revision and consultation with ongoing duty to cooperate with adjoining local authorities. In particular the preparation of the draft Brentwood Local Plan should be reviewed to take account of further technical evidence and potentially the outcome of other evidence including the testing of other spatial options being considered by the South Essex authorities as part of the preparation of a Joint Strategic Plan.</p> <p><i>It is recommended that specific additional evidence base required includes:</i></p> <ul style="list-style-type: none"> <li><i>* An updated SHMA to take account of the Government policy requirements not to use the 2016-based household projections;</i></li> <li><i>* Further evidence to have assessed the various spatial growth options;</i></li> <li><i>* A more fully developed transport evidence base that includes cumulative and site specific impacts of development on the local and strategic highway</i></li> </ul>	<p>Evidence base provision is considered in line with NPPF requirements and is therefore considered proportionate. The Council will be ensuring appropriate updates to the local plan evidence base for submission as appropriate.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>network and to identify further infrastructure and /or mitigation measures required together with costing and phasing;</p> <p><i>* An up to date Infrastructure Delivery Plan (IDP) that includes infrastructure costs, phasing, delivery and viability</i></p>		
<p>24140 - Mr Mr J Nicholls and Mr A Biglin (Land owners) [8368]</p> <p>24159 - Mr Mr J Nicholls and Mr A Biglin (Land owners) [8368]</p>	Object	<p>Significant elements of the evidence base to the Plan, which were prepared under the 2012 NPPF, have not been updated. For example, the Site Assessment Methodology and Summary of Outcomes - Working Draft provides the basis on which sites have been assessed as suitable for development and whether they should be allocated in the Plan. This document has not been amended to reflect the publication of the revised NPPF, or the Standard Methodology. The paper still refers to making provision for 'slightly above 380 dwellings per annum'; in fact, this number will need to increase significantly. Site Assessment Methodology and Summary of Outcomes - Working Draft (2018): We do not consider that the capacity of brownfield sites has been fully explored. The Stage 2 assessment process discounts sites where they are considered to be in an unsustainable location, before considering the potential to use brownfield land. This has resulted in sites such as site 183, our client's site, being discounted prior to any assessment of the positive benefits of the re-use of this brownfield site and whether the location is sufficiently sustainable or can be made sustainable.</p> <p><i>The Plan should be updated so that the housing need is calculated based on the Government's standard methodology for calculating housing need, as well as reflecting the findings of the Housing Delivery Test. This will significantly increase the housing numbers and the number of sites required. Further consultation should then take place on a revised draft Plan, before it is submitted for Examination. In light of the higher housing numbers required, the Plan should be revised to re-assess all sites which do not meet the distance thresholds from existing settlements, and to take into account opportunities offered by smaller sites in the Green Belt, which could offer sustainable transport modes, and make a small but important contribution to meeting housing need.</i></p>	Noted.	The Council will be ensuring appropriate updates to the local plan evidence base for submission as appropriate.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23879 - Ms. Isobel McGeever [7286]	Object	<p>The Council's most recent Green Belt Study, assesses the site under Site Assessment 186. To note, only the car parks to the western extent of the site fall within the Green Belt, therefore the assessment only relates to 25% of the site. Overall, the site was assessed as having low-moderate contribution to the Green Belt. The site was considered as a 'partly developed site' due to the hardstanding car parks and was associated with the settlement boundary to the east.</p> <p><i>Should any part of the Brentwood Community Hospital site be declared as surplus to the operational healthcare requirement of the NHS in the future, then the site should be considered suitable and available for alternative use, and considered deliverable within the period 5-10 years. These representations identify the sites potential for future development, in accordance with the realignment of the Green Belt so that this significant area of development land is no longer included. It is evident, that the site does not make a positive contribution towards the purposes of the Green Belt set out in the NPPF. Accordingly, redevelopment of the site could provide a key contribution to Brentwood's housing need, which the Council have failed to justify, given the reliance on key strategic sites, and the lack of acknowledgement for unmet need arising from neighbouring authorities (Basildon and Havering). These representations therefore promote and identify parts of the Brentwood Community Hospital site as a suitable site to contribute towards these requirements. This site presents an excellent opportunity for a high quality residential redevelopment on previously developed Green Belt land. This could be achieved without compromising the character of the area as the development can act as an infill site to the existing residential development surrounding it, and without the need for significant infrastructure. Furthermore, the site is also available to accommodate further health related development should the CCG seek to expand their services in this location, including the possible expansion of the hospital to provide more comprehensive services for the community. However, the site's Green Belt designation would make it difficult for any planning application proposing additional built form to provide further healthcare</i></p>	Noted	No change



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>services to be considered acceptable. The subject site is considered available, suitable and deliverable within the 5-10 year period of the plan.</i>				
<i>1.16</i>				
22335 - Miss Katherine Webster [6005]	Object	<p>The Council has used flawed data and has not taken proper account of evidence provided to them by residents or indicated that it has received widespread objections. The Council should have regard to all evidence, internally and externally generated, and should either include it or explain and justify why it has been excluded.</p> <p><i>The Plan should indicate the significant local opposition and either include the factual evidence supplied to them, or explain why it has been ignored.</i></p>	Noted.	No change.
22495 - Mr Martin Skinner [8251]	Object	<p>The Council has not included or addressed contrary evidence provided by residents as part of the consultation process for site R19. Therefore the evidence base is incomplete and the process is not sound.</p> <p><i>The sustainability review should include all factual evidence provided. The Leader of the Council stated early in the process that this would be an evidenced based process yet has consistently refused to address concerns based upon the evidence provided by sources other than the Council.</i></p>	Noted.	No change.
<i>1.17</i>				
22336 - Miss Katherine Webster [6005]	Object	<p>The residents have provided evidence as requested by the Council which supported our view that the sites R19 are inappropriate. The Council has not engaged with the residents with regard to this evidence despite our requests.</p> <p><i>The sustainability review should include the resident's evidence that the access to R19 may not be viable due to safety risks, or explain why it has not been included.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Sustainability Appraisal</i>				
23669 - Gladman Developments [2774]	Object	The Council should ensure that the future results of the SA clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives. The Council's decision-making and scoring should be robust, justified and transparent.  <i>Further work on the SA is needed.</i>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25804 - Mr Timothy Webb [5612]	Object	<p>strongly object to all non-brownfield proposed housing site allocations. The local plan fails to fulfil the prescribed criteria because it involves a deliberate wanton, massive, wholesale destruction, despoliation, violation and vandalism of the countryside and the green Belt in contravention of the Town and Country Planning Acts and the five main purposes of the Green Belt as stipulated by the National Planning Policy Framework.</p> <p>This is with regard to Dunton Hills Garden Village (R01), Shenfield (R03), Blackmore (R25 and R26), two schemes at Kelvedon Hatch (R23 and R24), Doddinghurst Road (R16 and R17)</p> <p>Additionally the plan fails to satisfy the objectives of the sustainability appraisal with regard to Soils, Heritage, Landscape, Biodiversity.</p> <p>The Duty to Cooperate has not be met in that the views of statutory bodies have not been met regarding Dunton Hills Garden Village.</p> <p>The concerns of Blackmore Parish Council on R25 and R26 have been treated with contempt.</p> <p><i>Planning are building according only to absolute irrefutable necessity and not based on hypothetical projections of dubious accuracy way into the future. Rejecting all development in the countryside/Green Belt, thereby respecting and upholding relevant statutes.</i></p> <p><i>Concentrating unavoidable development on brownfield sites. eg West Horndon industrial estate R02, Warley (R04 and R05) and Wates Way industrial estate (R15), followed in order of priority by Ingatestone (former Garden Centre R21 and other R22) and town centre car parks (R10, R11, R14) in each case seeking greater yield by increasing density and constructing additional storeys.</i></p> <p><i>Complying with the prescribed objectives of the sustainability appraisal.</i></p> <p><i>Respecting council taxpayers, and the democratic process by rejecting any, all developments where there is significant local opposition.</i></p> <p><i>All policy - local, regional, national, international should be predicated primarily on the need to restrict and ultimately reverse unsustainable population growth, not pander to it.</i></p>	Noted	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23840 - Strutt & Parker LLP (Mr Alasdair Sherry) [6713]	Object	<p>Paragraph 5.5.31 of the SA confirms that Site 078 is listed as 1 of 5 omission sites in the HELAA as it is "deliverable or developable". The SA confirms that the two sites with the greatest potential for allocation are the adjacent "Parklands" Sites. The SA states that the accompanying Green Belt Review found that both sites contribute to the purposes of the Green Belt to a 'moderate' extent, however neither site is fully contained in the landscape. The SA concludes that the option of adding one or more omission sites was determined as "unreasonable", for the purposes of establishing reasonable spatial alternatives. The SA does not provide a justified reason for the rejection of the site.</p> <p><i>Provide a justified reason for rejection of site R078 in SA</i></p>	Noted	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24078 - LaSalle Land Limited Partnership [8362]	Object	<p>Object to the omission of Honeypot Lane from the Brentwood Pre-Submission Local Plan. Honeypot Lane is a sustainable development location in close proximity and easy access and integration with new jobs, community facilities, services and greenspace as a principal tier 1 category settlement; it would contribute to the five year housing supply; it has already been tested by the Sustainability Appraisal. Removal is not justified. Should further note the SA assessment: 8 criteria score as Green , 9 amber, 0 red. Have reviewed Amber scores and positively comment on the following: Air Quality management Areas; SSSIs; Local Wildlife Site; Woodland; Green Belt; Special Landscape Area; Agricultural Land, General Practice Surgery, Primary school and Secondary School.</p> <p><i>LLLP conclude that the Plan needs to be modified to identify and allocate Land at Honeypot Lane, Brentwood (ref: 022) for residential development of up to 250 new dwellings with associated transport, community and green infrastructure. The Brentwood Borough Local Plan: Pre-Submission, January 2019. Allocation of Honeypot Lane must include its removal from the Green Belt and the appropriate revision of the boundaries of that designated area. The Plan's proposed Housing Trajectory (Appendix 1), the Key Diagram and the list of proposed allocation sites should be updated to include Land at Honeypot Lane accordingly.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23122 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>Challenge whether the SA has informed the choices made in the Spatial Strategy, given it states that there was an early intention by Brentwood Council to deliver at least one new large-scale strategic site, which could be judged as artificially limiting the exploration of other plausible and deliverable urban/ village extensions. The lack of a HELAA between 2011-2018 has negatively impacted upon previous Reg18 drafts, which could have evolved differently having been informed by such evidence, demonstrating that other suitable, available and deliverable site options were present. This is unjustified, inconsistent with SO1 and not in accordance with the NPPF.</p> <p><i>The Sustainability Appraisal should be reviewed to test an alternative strategy which does not include the artificial assumption that at least one new large scale strategic site should be incorporated into the Local Plan and then it should be amended accordingly. The Plan should then be reviewed informed by the outcome.</i></p>	Noted	No change.
24629 - Terence Dearlove [8404]	Object	<p>The Sustainability Appraisal refers to improvement of services and facilities in rural areas but that is completely undermined by the impact that proposed developments R25 and R26 will have on residents of Blackmore and those in the surrounding areas reliant on Blackmore facilities. Blackmore Village is categorised as Cat. 3 (large village) however this is outdated as the village now consists of just one small village shop (inclusive of a Post Office counter) and one small primary school. The SA includes an objective to reduce flood risk. Blackmore already has significant challenges. Further development will almost certainly make a bad situation worse and hereby also conflict with the SA.</p> <p><i>Sites R25 and R26 should be removed from the LDP and planners should refer to the Blackmore Village Heritage Association 'Neighbourhood Plan', which clearly sets out the local housing needs for our already sustainable community.</i></p>	Noted	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24069 - Countryside Properties [250]	Object	<p>The SA Report is simplistic in its approach to individual site assessment. It has used a predominantly spatial or 'GIS' approach to the assessment of each criteria, and no consideration for the positive contribution that the development of sites can make to the natural environment and local facilities. The assumption made within the Sustainability Appraisal that sites will only negatively impact the Green Belt and other landscape and natural environment designations has contributed to the unjustified omission of sites from allocation, such as site 030A.</p> <p><i>Reconsider sites such as 030A within the SA.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24396 - Chelmsford Diocesan Board of Finance [2627]	Object	<p>The Environment Assessment of Plans and Programmes Regulations (2004) requires SA/SEA to inter alia set out the reasons of preferred alternatives, and the rejection of others, be made set out. In addition, the Planning Practice Guidance<sup>4</sup> makes clear that the strategic environmental assessment should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. Sustainability appraisal of the PSLP has been published: The Sustainability Appraisal of the Brentwood Local Plan January 2019 (the SA). Site 033 has been wholly discounted, failing to progress to 'shortlisted omission sites' nor the final shortlist. The SA explains that a number of sites were identified through the HELAA that were considered developable or deliverable, but are nevertheless not proposed to be allocated in the PSLP. The SA does not provide a justified reason for the rejection of the site. Paragraph: 038 Reference ID: 11-038-20150209.</p> <p><i>We seek modifications to refine the Site Appraisal Criteria contained in the SA of the Brentwood Local Plan, prepared by AECOM. The decision process for utilising the RAG scoring is unclear in regards to the weighting given to the overall scores, and how this results in a site being considered suitable for allocation or unsuitable. The criteria set out in Appendix B Table 3 must adopt a more refined approach to its scoring in order to be of use in the identification of which sites and more or less sustainable. Criteria 7, 8, 9 should take account of the capacity of existing facilities and the scale of a proposed site, as this will affect the ability to provide additional facilities, or to support existing facilities. Criteria 10, 12, 13, 15 each assume that closer proximity of a site will have a negative effect on the criteria, when this is not necessarily the case. Criteria 17 should not be included in the SA as the notes for this criteria (p.96) confirm the Agricultural Land Classification Maps are of a poor resolution. It is recommended that a more refined scoring system is required to improve the utility of the SA to the identification of sustainable sites. A more refined scoring system would more accurately reflect the sustainability of any potential allocation. Further,</i></p>	Noted	No change



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>greater transparency is required in relation to how the individual RAG scores have been used to reach a decision to allocate or omit sites.</i>		
22497 - Hallam Land Management Limited [8258]	Object	<p>Whilst the SA has been updated to reflect decisions taken regarding the Local Plan at the Extraordinary Council meeting in November 2018, the decision was not made in light of the SA of January 2019</p> <p>Other strategic options should be appraised which appraise higher levels of growth to reflect the higher level of LHN that now needs to be planned for. The SA should therefore re-assess its appraisal of additional growth at Brentwood in light of the evidence presented by Hallam Land Management within its representations in respect of Calcott Hall Farm.</p> <p><i>The Sustainability Appraisal must be reviewed and updated in light of changes that need to be made to the Draft Local Plan, and in light of new evidence presented to the Council as to the positive effects of development of Calcott Hall Farm, Brentwood.</i></p>	Noted	No change
26090 - Mrs Kate Hurford [4275]	Object	<p>Failure in their obligation to preserve Green Belt as laid out in the Sustainability Appraisal - 507 Safeguard the Green Belt and protect and enhance valuable landscapes and the natural historic environment.</p> <p><i>A fully evidenced survey of the suitability of these proposed sites is required taking into account the obligations of the local authority to protect green belt and the heritage assets in Blackmore village. Detailed flood risk analysis is required. Assess fully any available or new currently unknown brownfield sites in more suitable locations. Meaningful consultation with neighboring authorities namely Chelmsford to consider the suitability of unmet housing needs being covered with an agreement with other authorities. Evidence and develop a strategic approach for the north of the borough</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23640 - Countryside Properties [250]	Object	<p>The SA seems to have relied on what was being proposed by developers/promoters of the key strategic sites, raising concerns about the fairness and consistency of the appraisal. Particularly it relies without question upon the word of CEG as the promoter of DHGV. In contrast, the SA acknowledges proposals for a new settlement in the north of Thurrock where it adjoins West Horndon but rejects these on the basis that "this proposal is at such an early stage of formulation that it cannot be considered to be a potential issue or constraint in delivering DHGV".</p> <p><i>The SA and evidence base do not support the spatial strategy for growth set out in the Local Plan. The Local Plan process should be suspended to allow a fundamental review of the SA.</i></p>	Noted. Disagree.	No change.
23639 - Countryside Properties [250]	Object	<p>The SA does not fully support the proposed spatial strategy and cannot be said to have informed the Plan. Throughout the preparation of the Plan, the Council has maintained its intention to deliver at least one large-scale, strategic site for a mixed scheme of housing and employment. The SA identifies two options: West Horndon and DHGV. DHGV was chosen as the preferred option mainly as a result of the Council despite this is contrary to the accompanying evidence base which appears to lend greater support to growth adjoining the existing settlement of West Horndon.</p> <p><i>The SA and evidence base do not support the spatial strategy for growth set out in the Local Plan. The Local Plan process should be suspended to allow a fundamental review of the SA.</i></p>	Noted	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24398 - Dr. S.J. Jennings [1497]	Object	<p>Object to inclusion of sites R25 and R26 in Blackmore as it is unsuitable location for development due to damage on historical village, there is no strategy for development in the villages in BBC, surface water flooding is an important issue with historical flood events, the infrastructure isn't sufficient: the roads, sewerage, flood protection, power supply, GP services, school places, parking, and this will be exacerbated when combined with Epping Forest DC proposed development.</p> <p><i>Blackmore Village Heritage Association will be producing a Local Needs Plan in cooperation with the Local Parish Council.</i></p> <p><i>Other villages are reported to desire more housing to make them viable.</i></p> <p><i>Infrastructure - huge improvements needed. Refer back to representations.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24372 - Childerditch Industrial Estate [8371]	Object	<p>The SA forms only one part of the evidence base underlining the PSLP. The evidence base also includes documents such as the Brentwood Economic Futures 2013-2033 Report, Green Belt Study and Transport Assessment. In allocating additional land at Childerditch Industrial Estate, Brentwood Borough Council has taken a balanced judgement on the site constraints and the need to provide to create additional employment opportunities within the Borough. The SA is currently focused on a spatial approach to the assessment of each criterion, using the distance between the site and various factors to judge the extent to which it either achieves certain objectives or not. However, it is considered that the SA fails to fully consider the nature of each proposal or the likelihood in practice of effects in sustainability terms, where a 'broad brush' approach has instead been taken to sites regardless of their intended use. For example, in respect of distance to a GP Practice, the proposed employment allocations at Childerditch Industrial Estate have been scored in the same manner as a residential allocation. However, it is considered to be less important for an employment site to be located within close proximity to a GP practice than a residential site, given the nature of the uses. Therefore, Childerditch Industrial Estate should be considered against a different set of criteria more relevant to the proposed employment allocation. ). On review of the appraisal of Childerditch Industrial Estate, the site has not scored particularly well in relation to the criteria that has data available. However, it is considered that the SA, or at least the sustainability criteria, could be too sensitive when it comes to assessing sites against the criteria. The fact that no site performed 'particularly well' against any of the criteria suggests that the scope of the assessment makes many sites appear unsustainable, with limited opportunity to score 'green' in many of the objectives. We do not consider that the sustainability of the site has been considered in sufficient detail by the SA given the particular circumstances of the site and existing uses.</p> <p><i>The Childerditch Industrial Estate sites have additionally been scored 'amber' with regard to effect on agricultural land, with the methodology stating that any site in land classified as Grade 3 will be 'amber'</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>and Grade 2 will be 'red'. While the assessment notes that the dataset used is of poor resolution, the assessment has failed to adequately consider the existing nature of the sites (with particular regard to site 112D), as well as differentiate between Grades 3a and 3b. We would consider that the criteria should be amended to be more in line with the aims of Government policy, and that the sites be assessed on the basis of whether their use for employment purposes would lead to the loss of the best of the best and most versatile land.</p>		
25798 - Mr Matthew Ionescu [8576]	Object	<p>Noticed Ingrave isn't marked as a location for improvement or partial urbanisation. In the SA , Figure 5.8 as an option would reduce parking. In the town centre, Sainsbury's parking is already full and costs money to park. Table 6.1 in the SA [Sustainability Appraisal] notes Brentwood ranks low with "significant effects". Urbanisation in these areas could further effect the biodiversity and quality if further traffic is added. This relates back to 024 Sawyers Hall Lane. The railway station in Brentwood being made into homes would mean people could park and would be able to counter productive to an increase in housing and local traffic.</p> <p>I feel a reduction in car parking would be a detriment to Brentwood community in come and ability for Brentwood to be a high street to visit since there is already limited parking.</p> <p>Even if 9.4.9 'other modes of transport' [Sustainability Appraisal] mean increasing local pots for the council as money making. I feel that older people cannot always rely on public transport. My experience is that it is slow and unreliable.</p> <p>I would prefer to pay for parking. This would enable me and my older family to retain independence around the neighbourhood rather than worrying about catching the bus. If your plan 9.4.10 [Sustainability Appraisal] states that there are no 'significant positive effects' doesn't this require re-evaluation to enable better effects?</p> <p><i>Has considered local opinions to an extent but requires further local consultation with residents.</i></p>	Noted	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23641 - Countryside Properties [250]	Object	<p>Appraisal of the spatial strategy alternatives in versions of the SA over time, demonstrate differing results for which there is no justification. Under several topics the score for West Horndon has been downgraded in the most recent appraisal, without proper explanation (see appendix 1). The latest proposals by Thurrock on land to the south of West Horndon throw a different light on the SA conclusions.</p> <p><i>The Local Plan process should be suspended to allow a fundamental review of the SA.</i></p>	Noted	No change
24113 - Marden Homes Ltd [8363]	Object	<p>The SA Report is simplistic in its approach to individual site assessment. The SA has used a predominantly spatial or 'GIS' approach to the assessment of each criteria. It has had no consideration for the positive contribution that the development of sites can make to the natural environment and local facilities, such as in the case of Site 284. The assumption made within the SA that sites will only negatively impact the Green Belt and other landscape and natural environment designations leading to the unjustified omission of sites from allocation, has resulted in the Local Plan being unsound.</p> <p><i>Reconsider SA of site 284</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23949 - CEG Land Promotions Limited [5050]	Object	<p>Sustainability Appraisal (Local Plan, page 15) &amp; Interim Sustainability Appraisal (January 2019)</p> <p>The Planning and Compulsory Purchase Act 2004 makes clear that local planning authorities must carry out a process of sustainability appraisal alongside plan making. This approach is reinforced in the NPPF which states that local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant statutory tests. Sustainability appraisals are required to demonstrate how the plan has addressed relevant economic, social and environmental objectives and avoid significant adverse impacts, wherever possible.</p> <p>The Council has prepared Interim Sustainability Appraisals throughout the preparation of the Local Plan and this has informed the Spatial Strategy. The latest Interim Sustainability Appraisal explains the seven alternative development scenarios considered and the reasons for supporting some scenarios over others. There is an assessment of each scenario against economic, social and environmental topics based upon the relevant evidence base for each topic. This assessment explains why some scenarios rank higher than others. The Interim Sustainability Appraisal is sound and has been prepared in accordance with legislative requirements and the NPPF.</p> <p>CEG supports the conclusion regarding DHGV but considers that the Council should supplement the assessment of the options - this could be more empirical and provide a fuller explanation of the conclusions reached, with more cross reference to the outcomes of other evidence base. Furthermore, in considering landscape issues the assessment does not deal with the landscape capacity of sites or areas to accommodate new development.</p> <p><i>Sustainability Appraisal (page 15)</i>  <i>CEG considers a supplementary note or the like should be prepared by the Council to provide a fuller explanation of the conclusions reached in the Interim Sustainability Appraisal and how this has informed the Spatial Strategy which has been adopted.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23121 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>The Council questions whether the Spatial Strategy is therefore justified and consistent with national policy. The two transport corridors don't offer comparable choices in terms of the capacity of these transport connections. Four reasonable site alternatives in the Central Brentwood Corridor have been disregarded in the Sustainability Appraisal, despite having few constraints and being able to tap into the potential for movement capacity. This is considered to be in conflict with sustainable development when sites which have significant constraints to development or delivery have been included within the Plan, at the expense of sites which have fewer constraints.</p> <p><i>Using the Sustainability Appraisal and other evidence, the Plan should select sites within the Central Brentwood Growth Corridor that provide opportunity for extensions to towns and villages that can encourage more sustainable travel choices and take advantage of the superior infrastructure available. This should help encourage commuting behaviour to shift away from private car use and therefore make this location a more sustainable and viable option to concentrate growth. Chapter 3 should be modified as a result along with all land use allocations in Chapter 6 and Chapter 7.</i></p>	Noted	No change.
22369 - Rochford District Council (Planning Policy) [4178]	Support	<p>The Council has no specific observations to make on Brentwood Borough Council's Draft Sustainability Appraisal or Habitats Regulations Assessment for the Pre-Submission Draft (Regulation 19).</p> <p><i>No change proposed</i></p>	no response required	No action required
24009 - Croudace Strategic Ltd [2656]	Support	<p>We support the overall approach to the Sustainability Appraisal, insofar as:</p> <ul style="list-style-type: none"> <li>* It follows a robust process in evaluating alternative options for growth as well as specific site options;</li> <li>* The approach to individual site options is considered to be sound; and</li> <li>* It is considered to be "sound" in that it arrives at the most reasonable option for growth</li> </ul> <p><i>No change proposed</i></p>	Support for SA approach welcomed	No further action required



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23761 - St Modwen Properties PLC [5124]	Support	With regards to scoring of Brentwood Enterprise Park, in the SA a number of the assessed criteria could be more accurately represented. Table B: in respect of its effect on Air Quality Management Areas, medium score would be more appropriate; in respect of proximity to County Wildlife Sites and Ancient Semi Natural Woodlands, a medium score would be more appropriate; in respect of its proximity to services the score should be 'NA'. As such, the current SA may suggest the proposed BEP is less sustainable than it actually is and this references should be updated.  <i>Update SA references</i>	Noted	No change
<hr/>				
<i>1.19</i>				
22563 - Gerald Downey [4671]	Object	It's stated that the Sustainability Appraisal is a "systematic process". Note that the "Site Options Appraisal Findings Table C" from the original AECOM Interim SA (Ref: AECOM Interim SA Report, Feb 2016; <a href="http://www.brentwood.gov.uk/pdf/12022016101306u.pdf">http://www.brentwood.gov.uk/pdf/12022016101306u.pdf</a> ) contained "24 Appraisal Criteria". The updated AECOM Interim SA (January 2018/2019), now contains just "17 appraisal criteria". What has happened to 7 of the criteria in this systematic update; including removal of "Protected Urban Open Space" of which some sites performed poorly. I have concerns about the SA process with the criteria changing at key stages in the plan making process.  <i>Review the 7 criteria that were dropped from 2016 to 2018, including Protected Urban Open Space" so that "apples can be compared to apples" over time. Check if including these 7 criteria would have had a significant impact on decisions made during the plan making process.</i>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>1.20</i>				
22582 - Mr Sasha Millwood [4539]	Object	<p>Insufficient weight accorded to paramount importance of Green Belt, despite a strong mandate from local residents for the Green Belt to be preserved absolutely and entirely. Under the NPPF, the Green Belt is a perfectly acceptable reason to NOT meet Objectively Assessed Housing need, irrespective of neighbouring authorities.</p> <p><i>Return to the 2013 version, in which the Green Belt was deemed paramount above ALL other considerations. This would be in line with the NPPF, even if it resulted in not meeting the Objectively Assessed Housing need. Given the strong housing market in Brentwood (contrary to the views expressed in Supporting Documents dating from early 2010 &amp; 2011, during a national recession) and the excellent public transport connections, the density of developments could be radically increased (i.e.: blocks of flats, not houses).</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Habitats Regulation Assessment</i>				
25410 - Mr William A Smith [8512]	Object	<p>Sections HRA, R25 and R26This plan is no dealing with a problem, it is making one, We do not have the infrastructure in this village or town. I need myself a good hospital, a GP appointment, these are both overstretched and difficult to obtain, they do their best but we have far too many people per doctor. Our village now is not properly maintained. No street cleaning, no road repairs, no police, long waiting times nationally for ambulances. These things are important for young and old alike. There is nothing in this local plan that deals with this. Developers build, take the money and leave us with the mess these plans solve nothing to alleviate anything, I also have lived in this town 80 years.</p> <p><i>We need the investment to go with the plan not just houses we need massive improvement too infrastructure sewers, schools, Drs hospitals transport, better roads, we need a consultation to the whole of Brentwood, this is a devastating plan to our village and a disaster to Brentwood. We need government money to carry this out. I too question the site at South Weald. Be withdrawn. I lived there all my young life. It is within easy reach of the M25 amenities, easy access to the city, town within walking distance, the site is available. Give me one good reason why you turned it down.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25838 - Mr Timothy Webb [5612]	Object	<p>Strongly object to all non-brownfield proposed housing site allocations. The local plan fails to fulfil the prescribed criteria because it involves a deliberate wanton, massive, wholesale destruction, despoliation, violation and vandalism of the countryside and the green Belt in contravention of the Town and Country Planning Acts and the five main purposes of the Green Belt as stipulated by the National Planning Policy Framework. This is with regard to Dunton Hills Garden Village (R01), Shenfield (R03), Blackmore (R25 and R26), two schemes at Kelvedon Hatch (R23 and R24), Doddinghurst Road (R16 and R17). Additionally the plan fails to satisfy the objectives of the sustainability appraisal with regard to Soils, Heritage, Landscape, Biodiversity. The Duty to Cooperate has not be met in that the views of statutory bodies have not been met regarding Dunton Hills Garden Village. The concerns of Blackmore Parish Council on R25 and R26 have been treated with contempt.</p> <p><i>Planning are building according only to absolute irrefutable necessity and not based on hypothetical projections of dubious accuracy way into the future. Rejecting all development in the countryside/Green Belt, thereby respecting and upholding relevant statutes.</i></p> <p><i>Concentrating unavoidable development on brownfield sites. eg West Horndon industrial estate R02, Warley (R04 and R05) and Wates Way industrial estate (R15), followed in order of priority by Ingatestone (former Garden Centre R21 and other R22) and town centre car parks (R10, R11, R14) in each case seeking greater yield by increasing density and constructing additional storeys.</i></p> <p><i>Complying with the prescribed objectives of the sustainability appraisal.</i></p> <p><i>Respecting council taxpayers, and the democratic process by rejecting any, all developments where there is significant local opposition.</i></p> <p><i>All policy - local, regional, national, international should be predicated primarily on the need to restrict and ultimately reverse unsustainable population growth, not pander to it.</i></p>	Noted	No change

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue/Change to Plan</b>	<b>Council's Assessment</b>	<b>Action</b>
<b>1.21</b>				
22266 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective: Request amendment to paragraph 1.21 to ensure factual representation of the most up to date Regulations.</p> <p><i>Amend paragraph 1.21 as follows - replace '61' with '63' replace '2010' with '2017'</i></p>	Factual change - Amend paragraph 1.21 - replace '61' with '63' replace '2010' with '2017'	Amend accordingly
<b>1.22</b>				
22267 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective and 4. Consistent with National Policy: The RAMS is not needed to assess the in-combination impacts - this is the role of HRA prepared by the LPA.</p> <p>Mitigation is needed because these impacts cannot be ruled out and a strategic approach was advised by Natural England. This has now been produced (Jan 2019) and a SPD is in draft to secure per dwelling developer contributions.</p> <p>Paragraph 1.22 should be amended to reflect this.</p> <p><i>Amend paragraph 1.22 as follows - '...(RAMS) has been identified for the internationally important designated wildlife sites on the Coast. A RAMS has been prepared (January 2019) to deliver strategic mitigation to avoid impacts on these sites from residential development within the evidenced Zone of Influence, with a view to subsequent adoption of a Supplementary Planning Document (SPD) by the Council to secure per dwelling developer contributions. Residential development that is likely to adversely affect the integrity of Habitats (European) Sites, is required to either contribute towards mitigation measures identified in the RAMS or, in exceptional circumstances, identify and deliver bespoke mitigation measures (in perpetuity) to ensure compliance with the Habitat Regulations. Mitigation is needed because these impacts, in combination with other plans and projects, cannot be ruled out and a strategic approach was advised by Natural England.</i></p>	Clarification of the role of the RAMS to deliver strategic mitigation and avoid impact from developments within the Zone of Influence.	Clarify role of RAMS mitigation in text.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>1.23</i>				
22539 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	Should this also cover the Thames Chase Community Forest?	Whilst it is appreciated that Thames Chase Community Forest works to improve quality and quality of habitat in the Thames Chase Community Forest Area, the HRA Regulations do not apply in this instance. Refer to Policy NE04: Thames Chase Community Forest.	No change
<i>Add reference to Thames Chase Community Forest</i>				
<i>Planning Policy Context</i>				
24139 - Mr Mr J Nicholls and Mr A Biglin (Land owners) [8368]	Object	<p>Since the Local Plan Regulation 18 consultation, which took place in early 2018, the revised NPPF has been published. Significant elements of the evidence base to the Plan, which were prepared under the 2012 NPPF, have not been updated. We question whether, in light of this fundamental change to the planning policy context, as well as changes to the introduction of the Standard Methodology for calculating housing need and the Housing Delivery Test, which will be discussed below, the Plan should progress to Examination.</p> <p><i>The Plan should be updated so that the housing need is calculated based on the Government's standard methodology for calculating housing need, as well as reflecting the findings of the Housing Delivery Test. This will significantly increase the housing numbers and the number of sites required. Further consultation should then take place on a revised draft Plan, before it is submitted for Examination.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>1.27</i>				
22268 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective: Request amendments to paragraph 1.27 to ensure factual representation of the adopted Essex Minerals Local Plan 2014.</p> <p><i>Add the following wording to the end of paragraph 1.27 - 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.</i></p>	Noted.	No change
<i>1.32</i>				
22269 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective: Request amendments to paragraph 1.32 to ensure factual representation of the adopted Essex and Southend-on-Sea Waste Local Plan 2017.</p> <p><i>Amend paragraph 1.32 to read: '... the Waste Local Plan does identify a number of Areas of Search across the county where the Waste Planning Authority may support development outside of allocated waste sites. These Areas of Search are all existing industrial estates, and any waste use proposed on these estates will be required to be in keeping with existing development. The Waste Local Plan seeks to focus any new proposals for waste management facilities, which support local housing and economic growth, within these Areas of Search before other locations are considered. Two such Areas of Search have been designated in Brentwood ...'</i></p>	Noted.	No change.
<i>1.34</i>				
22270 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective: Request amendments to paragraph 1.34 to ensure factual representation of the adopted Essex and Southend-on-Sea Waste Local Plan 2017.</p> <p><i>Add the following wording to the end of first sentence of Paragraph 1.34 -</i></p> <p><i>..., extending to 400m in the case of Water Recycling Centres.</i></p>	Noted and agreed.	Consider amending para 1.34 to include "...extending to 400m in the case of Water Recycling Centres."

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>South Essex Joint Strategic Plan</i>				
23144 - Thurrock Borough Council (Mr Richard Hatter) [2461]	Object	<p>Thurrock supports: commitment to ASELA, Brentwood's commitment to review the plan to ensure any opportunities for additional growth and infrastructure identified in the JSP can be realised; that the review would be an effective mechanism to align the plans in the future. However, it is considered that a number of the policies including SP02 should be amended to make reference to the circumstances and triggers in which the Brentwood Local Plan would need to be reviewed including failure to deliver the housing within the plan and /or a different spatial strategy or growth levels as a result of the policy approach following adoption of a South Essex Joint Strategic Plan.</p> <p><i>It is considered that a number of the policies including SP02 should be amended to make reference to the circumstances and triggers in which the Brentwood Local Plan would need to be reviewed including failure to deliver the housing within the plan and /or a different spatial strategy or growth levels as a result of the policy approach following adoption of a South Essex Joint Strategic Plan.</i></p>	Noted. No changes made.	None.



<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23950 - CEG Land Promotions Limited [5050]	Object	<p>South Essex Joint Strategic Plan (page 17 - 18)  The Council helpfully explains the progress that has been made on the Joint Strategic Plan (JSP) and the collaboration that has occurred on this. However, CEG considers that the relationship between the Local Plan and the JSP should be made clearer. It should be clearly explained that adoption of the JSP will only occur after the adoption of the Brentwood Local Plan and because of the timing the Brentwood Local Plan will contribute towards some of the growth requirements of the JSP. To address this, some modifications are suggested.</p> <p><i>South Essex Joint Strategic Plan (page 17 - 18)  The below modifications are proposed paragraph 1.38 to ensure the Local Plan is positively prepared and the relationship between it and the JSP is clearer:  "Work on the Joint Strategic Plan is at an early stage with adoption in 2020 expected after the adoption of the Brentwood Local Plan. The Brentwood Local Plan will contribute towards some of the growth requirements of the Joint Strategic Plan. early in that Plan. However, Following the adoption of the Joint Strategic Plan it may be necessary to review the Brentwood Local Plan."</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>Chapter 2. Borough of Villages</b>				
<i>Introduction to Borough Profile</i>				
22235 - Mr Anthony Cross [4376]	Object	<p>Inclusion of site allocations R25 and R26 in the LDP are inappropriate, unsound and not compliant with legal requirements on the following grounds: failure to prove that more suitable (brownfield) sites do not exist in the borough, or that other site allocations couldn't absorb the 70 dwellings proposed; inadequate consultation with Epping Forest District Council and failure to properly consider the impact of other nearby developments on Blackmore; failure to recognise the increased flood risk resulting from the proposed development; adverse impact on roads, noise levels and safety of existing road users from increased traffic; inadequate local amenities/services; other considerations per full representation.</p> <p><i>Removal of proposed developments R25 and R26 from the plan and reallocation of the 70 dwellings to more suitable brownfield sites in the borough.</i></p>	Noted	No change
23951 - CEG Land Promotions Limited [5050]	Support	<p>CEG supports the characterisation of Brentwood as a Borough of Villages and the Borough Profile (February 2019) evidence base which describes the unique nature of a market town and surrounding villages set amongst countryside as fundamental to the Borough's character. CEG considers that it is entirely appropriate that this characterisation forms a central part of the Vision set out in Chapter 3 of the Local Plan. Fig. 2.2 (Brentwood Borough Hierarchy) in the Local Plan draws from the existing and proposed settlement hierarchy diagrams set out in the Borough Profile, and shows in plan form how well the Local Plan proposals reflect the Borough of Villages character. This includes the DHGV proposal, which presents a very positive response to meet the Borough's housing needs and will fit into the hierarchy of settlements in the future as set out in Fig. 2.3 (Settlement Hierarchy) in the Local Plan</p> <p><i>No change proposed</i></p>	Support welcomed	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>2.3</b>				
22540 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	<p>The Thames Chase Trust politely requests that in addition to mention of the "Essex Countryside"; it also stated that the Borough falls within the Thames Chase Community Forest.</p> <p><i>State that the Borough falls within the Thames Chase Community Forest.</i></p>	Support welcomed.	Consider amending the text to include that the borough falls within the Thames Chase Community Forest.
<b>Settlement Hierarchy</b>				
24158 - Mr Mr J Nicholls and Mr A Biglin (Land owners) [8368]	Object	<p>Whilst we support the classification of Ingrave as a "Category 3 - Large Village", we object to the inconsistent treatment of this settlement in comparison to others of the same classification. For example, Kelvedon Hatch, Blackmore and Hook End/Tipps Cross have been allocated development. However, neither Ingrave and Herongate (now linked), Wyatts Green nor Mountnessing, have been allocated any development. Mountnessing has already accommodated some development though existing permissions on previously developed sites, but the same is not true for Ingrave. The moratorium of growth in these villages is contrary to the NPPF with regards to rural communities.</p> <p><i>Additional land for housing should be allocated at Ingrave to meet local, settlement specific housing needs to address localised affordability issues but also retain the working age population in the village to ensure the viability and vitality of local shops and services.</i></p> <p><i>Paragraph 2.16 of the Plan notes that, in relation to Category 3 settlements;</i></p> <p><i>'Brownfield redevelopment opportunities will be encouraged to meet local needs, and policies in this Plan will help to bring forward nearby redevelopment of brownfield sites in the Green Belt where appropriate.'</i></p> <p><i>This emphasis on bringing forward brownfield sites 'nearby' Category 3 settlements is supported. This approach would provide a more flexible approach and would enable sites such as our client's site to come forward.</i></p>	Support welcomed	No change

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue/Change to Plan</b>	<b>Council's Assessment</b>	<b>Action</b>
23146 - Thurrock Borough Council (Mr Richard Hatter) [2461]	Object	<p>It is requested that Brentwood borough council clarify how the proposed settlement hierarchy is supported by the appropriate evidence base. Brentwood borough council should include appropriate reference to the evidence base on this matter in the supporting text.</p> <p><i>It is requested that Brentwood borough council clarify how the proposed settlement hierarchy is supported by the appropriate evidence base. Brentwood borough council should include appropriate reference to the evidence base on this matter in the supporting text</i></p>	Evidence base provision is considered in line with NPPF requirements and is therefore considered proportionate. The Council will be ensuring appropriate updates to the local plan evidence base for submission as appropriate.	No change.
24454 - Mr Mark Mumby [8379]	Object	<p>LPP Fig 2.3 settlement hierarchy. There are errors in the plan, population states 829 but does not include houses past Red Rose Lane or the residents in Chelmsford Road and Traveller site.</p> <p><i>The issues listed shows that the modification would be to remove sets R25 and R26 from the plan. Blackmore Village Heritage Association has produced a plan which should be referred to by the planners. The Plan sets out our local housing needs for our community.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24073 - LaSalle Land Limited Partnership [8362]	Object	<p>LLLP support the overall settlement hierarchy and categorisation of individual existing towns and villages set out in Figure 2.2 of the BBLP but have concerns with respect to the categorisation of Dunton Hills Garden Village (DHGV) as falling within Settlement Category 2. This representation must be read in conjunction with the other representations submitted by LLLP with related matters.</p> <p>Support that Brentwood Town is settlement Category 1, but figure 2.3 does not provide sufficient emphasis that this category provides the most sustainable location for future development and services. LLLP object to Dunton Hills Garden village being in Category 2 as it is untested and does not exist, therefore does not relate to text or figures regarding settlement category.</p> <p><i>DHGV should be deleted from Settlement Category 2 and separately identified in both Figures 2.2 and 2.3 of the Plan in order to make plain its current situation. Paragraph 2.14 should then be modified accordingly to clearly articulate that the Garden Village does not yet exist and remains an aspiration of the BBLP rather than a final development scheme.</i></p>	Noted.	No change.
25650 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921]	Object	<p>The Parish Council and BVHA also take issue with the proposed allocation of Blackmore as a Category 3 settlement within the Local Plan Settlement Hierarchy (see pages 21-25 of the Regulation 19 Draft Local Plan). Therefore the Local Plan, with proposed allocations R25 and R26 and the allocation of Blackmore as a "larger village", is unsound in that it has not been positively prepared, is not justified, is not effective nor consistent with the National Planning Policy Framework (February 2019 edition)('the NPPF').</p> <p><i>Amend the plan to retain R25 and R26 as Green Belt and not allocate them for housing.</i></p>	Noted	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23900 - Crest Nicholson Eastern [2509]	Support	Description of Category 1 sites appropriately aligns with the characteristics of Brentwood, in that it provides a wide range of services and employment opportunities, is highly accessible and well served by public transport. We consider Brentwood's placement at the top of the Settlement Hierarchy as appropriate. Agree that development opportunities in Category 1 settlements "should focus on making the best use of land, with a higher density" because it would ensure that the development potential of such suitable sites, including Land at Nags Head Lane, is maximised.  <i>No change propsoed</i>	Support welcomed	No further action
23907 - Essex Partnership University NHS Foundation Trust [8344]	Support	We consider that Brentwood Urban Area's placement at the top of the Settlement Hierarchy, including Warley, is appropriate and justified. Warley as part of the Brentwood Urban Area provides a wide range of services and employment opportunities, is highly accessible and well served by public transport - this is demonstrated by being only 800m from Brentwood mainline / Crossrail station.  <i>No change proposed</i>	Support welcomed	No further action
<b>2.8</b>				
22271 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	BBC will need to be satisfied that the proposed Settlement Hierarchy is supported by the appropriate evidence base.  <i>BBC should include appropriate reference to the evidence base on this matter in the supporting text.</i>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Figure 2.3: Settlement Hierarchy</i>				
23313 - Mr John Riley [4905] 24435 - Mrs Vicky Mumby [8378] 24471 - Mr Frederick Piper [8380] 25125 - Valerie Godbee [4943] 25744 - Mr Douglas Piper [603] 25841 - Mr John Hughes [4500] 25856 - Mr Thomas Hughes [8637] 25863 - Mrs Gail Hughes [8638] 25870 - Mr Adam Hughes [8639] 26095 - Mr James Hughes [8677]	Object	<p>The population of Blackmore is listed as 829, but this doesn't make provision for the residents of Nine Ashes road nor does it cover the Travellers living illegally within the village bounds which Brentwood Council still refuse to take action on - nor the residents living on the Chelmsford road, who all use local amenities. The total of the separate population figures do not add up to the total population figure either- by a margin of around 600 people. Assumptions have been made based on these figures, calling into question the validity of the proposals.</p> <p><i>Due to issues referred to, it is the Council's duty to remove sites R25 and R26 from the LDP such that they do not overwhelm local amenities and services; such that they do not cause further flooding by removing crucial green spaces and such that they are not driving forward with plans that would adversely affect life in the surrounding areas. Blackmore is not an affordable area for young people trying to get on the 'property-ladder': so any attempt to provide affordable housing within that area is counter-intuitive.</i></p>	Noted	No change
23673 - Gladman Developments [2774]	Object	<p>Plan sets out within the Settlement Hierarchy in Table 2.3 that the development of brownfield land will be prioritised. This requirement has no support in National Policy as Para 117 of the Revised Framework (2019) simply states that substantial weight should be given to the value of using suitable brownfield land. This requirement should therefore be changed to reflect Government guidance. The prioritisation of brownfield land is also repeated in the Spatial Development Principles section under Paragraph 3.23 which similarly needs amending.</p> <p><i>Change requirement in Settlement Hierarchy in Table 2.3 that the development of brownfield land will be prioritised changed to reflect Government guidance.</i></p>	Noted	No change

Figure 2.3: Settlement Hierarchy

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23790 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738] 23791 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738]	Support	Support West Horndon as a large village within settlement Category 2.  <i>No change proposed</i>	No response required	No further action
<hr/>				
<b>2.13</b>				
22272 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	Clarification is sought on the infrastructure constraints of Ingatestone, given this paragraph states that Ingatestone has relatively good accessibility to public transport, has a rail station and a secondary school.  <i>BBC should make the appropriate reference to the evidence base covering this point.</i>	Noted	No change
<hr/>				
<b>2.14</b>				
23792 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738]	Support	Support improvements to access to West Horndon station arising from and facilitated by Dunton Hill Garden Village.  <i>No specific change proposed</i>	Support welcomed	No further action
<hr/>				
<b>Transport and Travel</b>				
23356 - Steve Abrahall [666] 23357 - Steve Abrahall [666]	Object	Can you please tell me if there are going to people any improvements to footways on Weald Road near Bardswell Close as I have lived in Brentwood 22 years and these pavements have never been done, also the pavements near Brentwood station are in a shocking state all loose and sunk! Also so much building near Brentwood station but no sign of the Council pushing for a faster service, the car park is always empty due to high fares and slow trains compared to Shenfield for speed and Harold Wood for cost. Also still no lift to platform 4 or no loos on the train despite nearly an hour to London!  <i>Improvement to Brentwood rail station and service</i>	Noted	No change
<hr/>				



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23274 - c2c Rail (Chris Atkinson) [8280]	Support	c2c strongly supports the importance of continued economic growth and the provision of more homes, both in Brentwood borough and the wider region. To deliver economic growth and the proposed housebuilding programme, maintaining and improving the transport infrastructure is absolutely essential and must be treated as such by the Council. Supporting the railway infrastructure in particular is vital, given the unique economic and environmental benefits it provides that cannot be delivered by investment in roads.  <i>No specific change proposed</i>	Support welcomed	The Council will continue to work with rail service providers to support the benefit of rail services.
<hr/>				
<i>2.35</i>				
22541 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	Please mention the Thames Chase Community Forest within this list of resources.  <i>Please mention the Thames Chase Community Forest within this list of resources.</i>	Support Welcomed	Consider referring to the Thames Chase Community Forest
<hr/>				
<i>2.37</i>				
22542 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	Please mention the borough's location within the Thames Chase Community Forest.  <i>Please mention the borough's location within the Thames Chase Community Forest.</i>	Support welcomed	No change
<hr/>				
<i>Health and Well-being</i>				
22760 - Mr Geoffrey Town [3982]	Object	More houses result in more cars means more emissions whereas government policy is for clean air.  Changes to Plan: No more houses.  <i>No more houses.</i>	Noted	No change
<hr/>				

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23239 - Mid and South Essex STP (Kerry Harding) [3791] 23241 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Within Brentwood administrative area, healthcare provision incorporates 9 GP Practices, 13 pharmacists, 9 dental surgeries, 10 Opticians, 2 community clinics and 2 community hospitals. Of the 9 GP Practices, 1 currently has limited capacity for growth and development. Existing health care services do not have capacity to accommodate significant growth and will require further investment and improvement in order to meet the needs of the planned growth shown in this LP document. The proposed developments would have an impact on healthcare provision in the area and its implications, if unmitigated, would be unsustainable.</p> <p>The Local Planning Authority should have reference to the most up-to-date strategy documents from NHS England which currently constitutes The Five Year Forward View and the NHS Long Term Plan. Reference should also be made to the emerging STP Estates Strategy and the Essex Health Places advice note for planners, developers and designers.</p> <p><i>Update in line with mitigation in line with most recent NHS documentation.</i></p>	Support welcomed.	Update in line with mitigation in line with most recent NHS documentation.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
2.47 23242 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Removal of any reference to additional GPs is also requested as this does not reflect the current strategies referred to above. 'Workforce' should be used in place of GPs to reflect the changing models of care and workforce mix across health. As an example of this the statement 'NHS England has identified an additional need for GPs subject to the location of future development.' On page 29, section 2.47 should be amended to read 'NHS England has identified the need for additional workforce to increase capacity to accommodate future development'.</p> <p><i>Remove any reference to additional GPs. 'Workforce' should be used in place of GPs to reflect the changing models of care and workforce mix across health. As an example of this the statement 'NHS England has identified an additional need for GPs subject to the location of future development.' On page 29, section 2.47 should be amended to read 'NHS England has identified the need for additional workforce to increase capacity to accommodate future development'.</i></p>	Support welcomed.	Consider changing page 29, section 2.47 to read 'NHS England has identified the need for additional workforce to increase capacity to accommodate future development'.

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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*Education and Schools*

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22273 - Essex County Council (Mrs Anne Clitheroe) [6776] 22274 - Essex County Council (Mrs Anne Clitheroe) [6776] 22275 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	Request additional paragraphs to be inserted at the end of this section to ensure that the full range of education provision is considered.	Noted	<p>Consider the following changes as proposed by ECC:</p> <p>Insert the following two paragraphs after paragraph 2.51 -</p> <p>Essex County Council has a statutory duty under the Childcare Act 2006 to ensure there are sufficient and accessible high quality early years and childcare provision. In September 2017, the Government also introduced the Extended Funding Entitlement, providing an additional 15 hours free childcare for 3-4 year olds who meet certain criteria.</p> <p>In general Brentwood has a diverse range of Early Years and Childcare provision to a high quality, however data suggests a large majority of areas are reaching maximum capacity and with the introduction of the Extended Funding Entitlement, childcare choices are limited and new provision will be needed with the additional developments planned.</p> <p>Insert the following paragraph at the end of the Education and Schools section (paras 2.49-2.51) -</p> <p>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 travelling into Havering.</p> <p>Insert the following paragraph at the end of the Education and Schools section (paras 2.49-2.51), and before paragraph 7.103 -</p> <p>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 i.e. 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.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
				<p>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.</p> <p>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.</p>
		<p><i>Insert the following two paragraphs after paragraph 2.51 -</i></p> <p><i>Essex County Council has a statutory duty under the Childcare Act 2006 to ensure there are sufficient and accessible high quality early years and childcare provision. In September 2017, the Government also introduced the Extended Funding Entitlement, providing an additional 15 hours free childcare for 3-4 year olds who meet certain criteria.</i></p> <p><i>In general Brentwood has a diverse range of Early Years and Childcare provision to a high quality, however data suggests a large majority of areas are reaching maximum capacity and with the introduction of the Extended Funding Entitlement, childcare choices are limited and new provision will be needed with the additional developments planned.</i></p> <p><i>Insert the following paragraph at the end of the Education and Schools section (paras 2.49-2.51) -</i></p> <p><i>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 travelling into Havering.</i></p> <p><i>Insert the following paragraph at the end of the Education and Schools section (paras 2.49-2.51), and before paragraph 7.103 -</i></p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p><i>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 i.e. 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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p>		
<b>2.54</b>				
23758 - Strutt & Parker LLP (Jen Carroll) [6751]	Support	<p>The Borough has a limited amount of previously developed land within its authority to provide for short term delivery, as such Green Belt release is required in order to meet the Authorities housing need and deliver within the short, medium and long term, as stated at paragraph 2.54 of the PSLP. The approach to amend the Green Belt boundaries is therefore supported.</p> <p><i>No change proposed</i></p>	Support welcomed	No further action
22543 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	<p>Please reference the Thames Chase Community Forest in this list.</p> <p><i>Reference the Thames Chase Community Forest in this list.</i></p>	Support welcomed.	Consider referencing the Thames Chase Community Forest.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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*Chapter 3. Spatial Strategy - Vision and Strategic Objectives*

*Vision*



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23580 - Dunton Community Association (Mr Edward Cowen) [6185] 23581 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	<p>The strategy is unreasonable and disproportionate in that it concentrates growth excessively at one particular point in the Borough. The Plan concentrates the loss of Green Belt land at one point in the Borough. This decision was based on a preconception and not on evidence. Proportion of homes in the area is too high. Impact on Green Belt not fully considered. Para 3.21 a &amp; b shows preconception drives sacrifice of Green Belt for Dunton HGV. Actually worst place in borough to do this.</p> <p><i>Section 03, Rep 1: In order to make the Plan legally compliant Dunton Hills Garden Village, Brentwood Enterprise Park and the East Horndon employment site should be removed from the Plan, and provision for housing and employment growth should be distributed in a proportionate fashion across the Borough.</i></p> <p><i>As mentioned in Section A, Representation 1, The Authority proposes to allocate 44% of the Allocation Total of homes and 78% of the Borough's new employment land to the small zone south of the A127. That zone amounts to just 5% of the land area of the Borough. Such a proposal is clumsy in the extreme and does not represent proper and thoughtful planning. An authority has a legal duty to act in a reasonable and proportionate manner. Such an unbalanced strategy is neither reasonable nor proportionate and so is unlawful.</i></p>	<p>Noted. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. There is a requirement in the NPPF to have a flexible supply of locations for new development to meet housing need (NPPF paragraph 68). This includes sufficient homes for the initial five years supply as well as sites of various sizes so they can brought forward for development. In relation to delivery, it is expected that an annual housing rate of 310 is achievable in accordance with SP02. The Council is of the view that DHGV can be delivered within the required timeframes as set out within the published trajectory. As part of the masterplan work, further information will be forthcoming on delivery of DHGV.</p>	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24075 - LaSalle Land Limited Partnership [8362]	Object	<p>Vision is not effective. Unclear what landscape-led or design and build with nature means or how this is translated into the proposed Dunton hill Garden Village allocation. Also unclear from the Vision Statement and supporting text how a landscape led approach accords with the definition of sustainable development established in the NPPF at paragraph 8. Overemphasis on environmental, needs more on economic and social. Therefor plan is not consistent with national policy and is unsound.</p> <p><i>LLLP conclude that amendment of the Vision Statement is required to ensure it properly reflects the three overarching national planning policy objectives for sustainable development and in particular makes an explicit reference to meeting in full the Borough's housing needs</i></p>	Noted.	No change.
22236 - Mr Anthony Cross [4376] 22526 - Holmes & Hills LLP (Mr Michael Harman) [8074]	Object	<p>Brentwood Borough Council has failed to demonstrate that the required housing need cannot be met on existing previously developed land/sites in existing urban areas or by increasing densities on proposed allocated sites.</p> <p>Without prejudice to the above contention, if no previously developed land/sites in existing urban areas or by increasing densities on proposed allocated sites exist, that Brentwood Borough Council has failed to demonstrate there are no or insufficient previously developed sites available outside the existing urban areas.</p> <p>In any event, there are greenfield sites available (for example adjoining existing urban areas) in preferable and more sustainable locations.</p> <p><i>Remove sites R25 and R26 from plan</i></p>	Noted.	No change.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23218 - Greater London Authority (Mr Jörn Peters) [6093]	Support	We welcome the Council's strategic longer-term approach to housing supply. Your target accommodates a 'buffer' on top of the housing need based on the Government's standardised methodology. It should be noted that our latest demographic modelling provides alternative population and household projections that could also be taken into account when applying the standardised approach. Our projections include consistent outputs for all local authorities in England and form the basis for housing need in the draft new London Plan.	Support welcomed.	No change.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24266 - Strutt & Parker LLP (Mr. Andy Butcher) [2741] 24309 - Strutt & Parker LLP (Mr. Andy Butcher) [2741] 24335 - Childerditch Industrial Estate [8371]	Support	Vision for the Borough: The Vision for the Borough set out at Section 3 of the PSLP is supported. For the reasons set out in these representations, carefully planned development at Kelvedon Hatch as provided for at Policies R23 and R24 will make an important contribution to BBC's housing needs to meet the Local Plan objectives. Indeed, these representations and those relating to R24 make the case that a modest and justified increase in the sites' ability to accommodate more homes will assist meet those aims and provide for greater flexibility in meeting housing needs. Stonebond Properties have undertaken detailed site assessments. These confirm that there are no barriers to delivery of development. As a consequence, the expressed objectives of development in the Vision to be landscape-led responding to a "design and build with nature approach firmly embedding high quality green infrastructure through public realm to create a seamless transition to our surrounding countryside" can all be achieved and delivered in the allocation of sites R23 and R24. This is demonstrated in the accompanying Vision Documents to this representation for R24. The PSLP sets out the overarching aims of the Spatial Strategy, which includes an emphasis on 'Transit-orientated Growth'. This identifies two key transit corridors, including the 'Southern Brentwood Growth Corridor'. The PSLP focuses growth on land within the Borough's transport corridors, with strategic allocations along the A127 corridor for employment, which is justified given the aims and objectives of the Plan. The Council's strategy to direct development growth to the Borough's transport corridors is supported and has potential to provide for employment growth in locations where there is strong market demand, and to minimise environmental impacts on the wider Borough. The proposed allocation at Childerditch Industrial Estate will assist in meeting this objective, by bringing forward new business and employment opportunities along the A127 corridor. It will help support the planned residential growth within Borough. The Plan has been positively prepared in this respect. The Strategic Objectives identified within Section 3 of the PSLP are supported. Economic prosperity forms a key part of the objectives.	Support welcomed	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
<i>No change proposed</i>				
23952 - CEG Land Promotions Limited [5050]	Support	<p>The Spatial Strategy identifies two growth areas which align with transport corridors; the Central Brentwood Growth Corridor and the South Brentwood Growth Corridor, within which DHGV is proposed. Development outside of these corridors will be limited to retain the local character of the Borough (paragraph 3.21).</p> <p>The NPPF recognises that the supply of a large number of homes can often best be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns (paragraph 72). The approach of planning for DHGV is consistent with this and retaining the local character of the Borough.</p> <p>CEG supports the Vision, the Driving Factors, the Overarching Aims, Strategic Objectives and the Strategic Allocation of DHGV as part of the South Brentwood Growth Corridor set out in Chapter 3. The Spatial Strategy and Development Principles will deliver the Vision. Given the importance attributed to Brentwood as a Borough of Villages and the need for Brentwood to meet its housing needs, the Spatial Strategy is sound; it is positively prepared, justified and consistent with national policy.</p>	Support welcomed	No further action
<i>No change proposed</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Spatial Strategy Driving Factors</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23150 - Thurrock Borough Council (Mr Richard Hatter) [2461]	Object	<p>Thurrock Council has previously objected to the spatial strategy through its various iterations in previous stages of Brentwood Local Plan consultation and those objections remain. It is unclear why the spatial strategy should advocate a free-standing greenfield settlement in the Green Belt and why this should be the preferred location for development compared to existing settlement expansion or green field urban extensions which are likely to be more sustainable, less constrained and are closer to existing transport and other existing infrastructure and services.</p> <p>The development of the Brentwood Local Plan spatial strategy appears to have:</p> <ul style="list-style-type: none"> <li>* not considered a suitable range of reasonable alternative options that are easier to deliver and/or less constrained;</li> <li>* put forward a large free standing settlement at Dunton Hills at an early stage which has pre-determined the spatial approach without being supported by the evidence;</li> <li>* not assessed reasonable options for a free standing settlement or large scale settlement expansion elsewhere in the borough that should have been tested through local plan development evidence and SA process;</li> <li>* developed a spatial strategy without key elements of the evidence base including land availability transport assessment;</li> <li>* not taken account of the emerging spatial options being pursued by the adjoining authorities such as Thurrock and through the joint work of the South Essex authorities.</li> </ul> <p><i>It is considered the Brentwood Draft Local Plan and supporting evidence base will require further major revision and consultation with ongoing duty to cooperate with adjoining local authorities. In particular the preparation of the draft Brentwood Local Plan should be reviewed to take account of the outcome of testing of other spatial options being considered including the evidence by the South Essex authorities as part of the preparation of a Joint Strategic Plan. Further work is required to develop the evidence base including the justification for the selection of the spatial options and dismissal of reasonable</i></p>	Evidence base provision is considered in line with NPPF requirements and is therefore considered proportionate. The Council will be ensuring appropriate updates to the local plan evidence base for submission as appropriate.	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
		<p><i>alternatives, housing capacity and supply further transport evidence and other infrastructure.</i></p> <p><i>Due to the issues highlighted in this response and to the earlier documents it is considered that Brentwood Council needs to carefully consider how it proceeds with the preparation of the Local Plan and the timetable for its production. It is recommended that the Brentwood Plan with its current spatial strategy and site allocations should not be submitted for Examination.</i></p>		
24170 - Turn2us [6753]	Object	<p>Hutton is identified as Category 1 - Main Town. It is clearly a sustainable location to which a proportion of the Borough's housing need should be directed. However, notwithstanding the above, the PSLP proposes to direct no housing growth to Hutton. This contrasts sharply with the proposed approach to the other settlements identified as Category 1.</p> <p><i>To ensure the Local Plan is sound, land should be allocated to ensure the sustainable growth of Hutton.</i></p>	Noted	No change



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23451 - Ms Christine Durdant-Pead [8117] 24717 - Anna Dunk [8426] 24742 - Barry Robert Dean [8435]	Object	<p>Blackmore is a small isolated village with modest services and infrastructure. The large scale development plan being proposed will, without a doubt, negatively effect the quality of life of its residents. The plan is being proposed by a developer who holds no knowledge of the village itself, which has resulted in a proposal that is completely inappropriate. The facilities in Blackmore are limited and an influx of new residents would be detrimental. The following reasons clarify why: 1. The proposed plan would produce overcrowding, resulting in an unacceptable increase in traffic and noise, destroying the very nature of our village. 2. There is no clear 'strategy' for the village and there are many other more suitable and sustainable locations for development. 3. Parts of the village are liable to flood. Building on the proposed land would increase the flood risk everywhere in the village. 4. There is just one shop in our village, an overcrowded primary school, and a local doctor surgery where it is extremely difficult to get an appointment. Such an increase in residents is simply unmanageable.</p> <p>A sound local plan would require: 1. The assessment must take into account the modest and limited services in the village, including the shop, doctor surgery, primary school and parking. 2. The character and nature of the village must be carefully considered, and the current residents quality of life must be protected. 3. BBC needs to look at the many other suitable locations in the area which can sustain this type of development. 4. The problems with flooding need to be taken into account and current problems with flooding addressed.</p> <p><i>A sound local plan would require: 1. The assessment must take into account the modest and limited services in the village, including the shop, doctor surgery, primary school and parking. 2. The character and nature of the village must be carefully considered, and the current residents quality of life must be protected. 3. BBC needs to look at the many other suitable locations in the area which can sustain this type of development. 4. The problems with flooding need to be taken into account and current problems with flooding addressed.</i></p>	Agreed. The Council has considered all the above points prior to determining the site allocations published within the plan.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24161 - Mr Mr J Nicholls and Mr A Biglin (Land owners) [8368]	Object	<p>The Plan's spatial strategy is unsound because it excluded all sites which do not meet the distance thresholds from existing settlements, and has not fully taken into account opportunities offered by smaller sites in the Green Belt, which could offer sustainable transport modes, and make a small but important contribution to meeting housing need.</p> <p><i>In light of the higher housing numbers required, the Plan should be revised to re-assess all sites which do not meet the distance thresholds from existing settlements, and to take into account opportunities offered by smaller sites in the Green Belt, which could offer sustainable transport modes, and make a small but important contribution to meeting housing need.</i></p>	The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.	No change
<hr/>				
3.6				
23148 - Thurrock Borough Council (Mr Richard Hatter) [2461]	Object	<p>Section 3.6 of the Brentwood Local Plan should identify the key cross-boundary issues and challenges between Brentwood and adjoining authorities including Thurrock. It should set out how the plan seeks to address these including any future reviews of the plan and through joint working on the South Essex JSP.</p> <p>Brentwood Council should prepare Statements of Common Ground on strategic cross- boundary matters in accordance with the requirements of the National Planning Policy Framework and Planning Policy Guidance.</p> <p><i>Section 3.6 of the Brentwood Local Plan should identify the key cross-boundary issues and challenges between Brentwood and adjoining authorities including Thurrock. It should set out how the plan seeks to address these including any future reviews of the plan and through joint working on the South Essex JSP. Brentwood Council should prepare Statements of Common Ground on strategic cross- boundary matters in accordance with the requirements of the National Planning Policy Framework and Planning Policy Guidance.</i></p>	Noted. The Council is in the process of producing a Statement of Common Ground on strategic cross-boundary matters with neighbouring authorities, statutory and non-statutory bodies.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22277 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>In accordance with paragraphs 21 and 27 of the NPPF, the plan should include information from its evidence base that identifies the cross-boundary issues, where they are located, and how the Plan seeks to address these. ECC would expect to see this in the section covering spatial challenges and opportunities in the Spatial Strategy chapter of the Local Plan.</p> <p><i>BBC should include within paragraph 3.6 information from its evidence base that identifies the cross-boundary issues, where they are located, and how the Plan seeks to address these.</i></p>	Noted.	Consider including information regarding the borough's evidence base that identifies cross-boundary issues within para 3.6.
<i>Housing Need</i>				
23670 - Gladman Developments [2774]	Object	<p>The Plan sets out that one of the overarching driving factors behind the BLP is meeting the housing needs of the borough. However, the Council are using the 2016 Household Projections to calculate the housing needs of the borough, use of the 2014 Household Projections is likely to yield a higher housing requirement and therefore, the Council will need to address this issue before the Plan gets to Examination.</p> <p><i>Use 2014 Household projections to calculate housing need.</i></p>	The Council acknowledges that the 2014 Household Projections are required as outlined within the standard methodology. The Regulation 19 consultation had commenced prior to the publication outlining the changes to the standard methodology which originally required the 2016 household projections. The Council included a buffer to the housing target in anticipation of the possible change to the standard methodology.	No change.
24059 - Mr Terry Haynes [8359]	Object	<p>The plan needs to be in line with para 59 of the 2018 NPPF to boost significantly the supply of housing, including small sites. Para 68 confirms that small sites should be at least 10% of the housing requirement on sites no larger than 1ha. The Council has only 5%. With the strategic Garden Village as well, more smaller sites are needed.</p> <p><i>Add the Land at rear of Mill House Farm to plan</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Spatial Strategy Overarching Aims</i>				
23578 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	<p>The spatial strategy focuses growth on the Borough's two transport corridors but fails to recognise that the A127 has no spare capacity whereas a major increase in capacity is planned for the A12.</p> <p><i>In order to make the Plan justified DHGV, Brentwood Enterprise Park and the East Horndon employment site should be removed from the Plan, and provision for housing and employment growth should be made in the north of the Borough.</i></p>	<p>Noted. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. There is a requirement in the NPPF to have a flexible supply of locations for new development to meet housing need (NPPF paragraph 68). This includes sufficient homes for the initial five years supply as well as sites of various sizes so they can brought forward for development.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Transit-orientated Growth</i>				
22832 - Lisa Atkinson [2991] 22833 - Lisa Atkinson [2991] 22834 - Lisa Atkinson [2991] 22838 - Mr Ian Atkinson [2993] 22839 - Mr Ian Atkinson [2993] 22840 - Mr Ian Atkinson [2993]	Object	<p>The proposed development within the Plan is highly concentrated within the A127 Corridor. This scale and concentration proposed will irrevocably harm the landscape, environment and Green Belt within this area (at a disproportionate level than the wider Borough). Basildon, Thurrock, Castle Point, Rochford and Southend-on-Sea are also planning for growth and will also be relying on the A127 Corridor. Thurrock is considering a site for 10,000 + homes on land adjacent to West Horndon village. The Plan does not take account of this. It states that the area would remain surrounded by countryside but this would not be the case. A sustainable level of development within the A127 Corridor should be limited to the development proposed at site RO2 (the West Horndon Industrial Estates). Even at this level however it would require a significant amount of infrastructure expenditure to ensure it is sustainable. Throughout the development of the Plan, potentially viable alternative sites have been ignored. I believe the initial rejection of further growth in the A12 Corridor, or any material development in the North of the Borough, is not founded on sound analysis or hard evidence. No account seems to have been taken of the A12 upgrade or Crossrail.</p> <p><i>Urge Brentwood Borough Council to rethink its current proposals and to come up with a revised plan that spreads the housing needs more fairly and equally across the Borough so that no one community is impacted so severely as in the current Plan.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23118 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>The Council questions whether the Spatial Strategy is therefore justified and consistent with national policy. The two transport corridors don't offer comparable choices in terms of the capacity of these transport connections. Four reasonable site alternatives in the Central Brentwood Corridor have been disregarded in the Sustainability Appraisal, despite having few constraints and being able to tap into the potential for movement capacity. This is considered to be in conflict with sustainable development when sites which have significant constraints to development or delivery have been included within the Plan, at the expense of sites which have fewer constraints.</p> <p><i>Using the Sustainability Appraisal and other evidence, the Plan should select sites within the Central Brentwood Growth Corridor that provide opportunity for extensions to towns and villages that can encourage more sustainable travel choices and take advantage of the superior infrastructure available. This should help encourage commuting behaviour to shift away from private car use and therefore make this location a more sustainable and viable option to concentrate growth. Chapter 3 should be modified as a result along with all land use allocations in Chapter 6 and Chapter 7.</i></p>	The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough.	No change.
24111 - Marden Homes Ltd [8363]	Object	<p>Hutton is recognised as Category 1 - 'a main town', it has an established local centre, a range of services, facilities, access to public transport, and employment opportunities. It is a highly sustainable location to accommodate a proportion of Brentwood's housing need. However, the Plan proposes no growth for Hutton. We therefore have concerns that the PSLP is failing to support the sustainable growth of Hutton and this omission is unjustified and inconsistent with national policy.</p> <p><i>Land at Hanging Hill Lane should be allocated in Hutton to ensure the sustainable growth of the settlement, and to ensure the soundness of the Local Plan.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23902 - Crest Nicholson Eastern [2509] 23909 - Essex Partnership University NHS Foundation Trust [8344]	Support	Allocating development in the transit corridors ensures that new homes will be sustainably located, linked to existing service centres through proximity and accessibility to strategic transport infrastructure. We consider this an appropriate and justified strategy.  <i>No change</i>	Support welcomed	No further action
23311 - Greater London Authority (Mr Jörn Peters) [6093]	Support	It should be noted that Brentwood is located within the new London Plan's Strategic Infrastructure Priorities 'Great Eastern Mainline (London - Ipswich - Norwich) and A12' and 'Essex Thameside, A217 and A13 corridor' (see Policy SD3 and Figure 2.15). The Lower Thames Crossing will also have implications for travel and land use in the Borough, which will need to be considered as the scheme progresses.  <i>Note the new London Plan's Strategic Infrastructure Priorities 'Great Eastern Mainline (London - Ipswich - Norwich) and A12' and 'Essex Thameside, A217 and A13 corridor' (see Policy SD3 and Figure 2.15) and impact of the Lower Thames Crossing</i>	Support welcomed.	No change.
23179 - Chelmsford City Council (Ms Gemma Nicholson) [8305]	Support	Chelmsford Council supports BBC's proposed Spatial Strategy and approach to housing and employment allocations, which are unlikely to have any obvious adverse cross-boundary impacts on Chelmsford. However, it is crucial that the allocations are supported by the appropriate infrastructure, in particular highway and transportation schemes due to Brentwood's location on the A12/Greater Anglia road and rail corridor.  <i>No change proposed</i>	Support welcomed	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>3.11</b>				
22278 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Narrative requires clearer references to evidence base to justify spatial strategy.</p> <p>Spatial relies on two largest strategic sites (DHGV &amp; BEP) along A127. Lack of clarity on transport impacts of development in locations and necessary supporting transport infrastructure requirements, particularly sustainable transport (necessary due to A127 location and capacity constraints).</p> <p>Local Plan needs to be supported by transport modelling to demonstrate site specific, local and cumulative impact on local and strategic transport network, to demonstrate spatial strategy is most appropriate.</p> <p>BBC and ECC have worked together to progress additional work, which is on-going and has not been completed or signed-off.</p> <p><i>BBC need to include within the Plan evidence, particularly in respect of transport, the site specific, local and cumulative impact on the local and strategic transport network, to demonstrate that the spatial strategy is the most appropriate.</i></p>	Noted.	No change.
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<b>Strategic Objectives</b>				
24088 - LaSalle Land Limited Partnership [8362]	Object	<p>LLLP object to the Strategic Objectives generally (and SO1 in particular) as there is no firm, clear commitment in any of the stated objectives to meet, in full, the Borough's housing requirement. The Strategic Objectives are not sound as they are not: Positively prepared - clearly establishing that the Plan will have the objective of meet the area's objectively assessed housing needs; Consistent with national planning policies - The Strategic Objectives are not consistent with national planning policies, including at paragraphs 8, 11(b), and 16(d).</p> <p><i>LLLP consider that the Strategic Objectives should be modified at an appropriate point in SO1 to clearly state that the Local Plan will meet the Borough's identified housing requirement.</i></p>	Noted. SP02: Managing Growth clearly identifies that the Local Plan will meet its housing need.	No change
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23666 - Gladman Developments [2774]	Object	<p>Given the emphasis being placed by the Government on fixing the broken housing market, a further Strategic Objective is added to the Plan that specifically relates to the delivery of housing, providing housing to meet the needs of the local population and of addressing one of the key challenges facing Brentwood, that of tackling housing affordability.</p> <p><i>Add a new Strategic Objective that specifically relates to the delivery of housing</i></p>	Noted. Chapter 6 (Housing Provision) and Chapter 9 (Site Allocations) include detailed policies on delivery of housing.	No change
26389 - Dr Eleanor Beddoe [8732]	Object	<p>Site R25 in appendix 2 appears to be in direct contravention of the strategic development objectives in section 3. It is outside the strategic growth areas, in a category C village which does not possess the infrastructure required to support this number of new houses.</p> <p><i>Revise site allocations to focus on urban extension to Brentwood or similar in identified growth areas. This would make the proposed development and associated plan more consistent and suitable when measured against its own objectives.</i></p>	The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood).	No change
26395 - Mr Gareth Beedoe [8733]	Object	<p>The strategic objectives of the local plan include delivering a healthy and resilient built environment as well as a clean and functional built environment. It then outlines how this strategy will be delivered in two key growth areas, the central Brentwood Growth Corridor and the South Brentwood Growth Corridor. The proposed development site R25, Land North of Woollard Way, Blackmore, is in direct contravention of this strategy. It is not in the two key growth areas, instead it is focused on a category 3 rural area which does not have the infrastructure to cope with this development.</p> <p><i>Removal of development site R25 would move the local plan consistent with the strategy outlined within the document. By focusing on brownfield sites in the key growth areas, the borough council would be demonstrating for greater sensitivity to the heritage of the area and preserve an idyllic rural village location</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25924 - Mr Kim Harding [8573]	Object	<p>Spatial Strategy - vision and strategic objectives. It is clearly stated that Brentwood has two key transit corridors. However the first names of these - the central Brentwood Growth Corridor with the A12, the Great Eastern mainline to London Liverpool Street station and the Elizabeth Line/Crossrail - has not been appropriately or adequately explored from a strategic, resilience and sustainability viewpoint in providing areas for housing and industrial development.</p> <p>This has meant undue reliance has been placed on the southern Brentwood Growth Corridor with the vast majority of proposed housing and industrial development being placed in the southern most part of Brentwood - namely West Horndon Parish.</p> <p>A disjointed plan that does not meet strategic needs and will create transport chaos.</p> <p>To fully explore the opportunities provided by the central Brentwood growth corridor in accordance with National Planning Policy Guidelines and not rely on the statement that Brentwood is a borough of villages.</p> <p><i>To fully explore the opportunities provided by the central Brentwood growth corridor in accordance with National Planning Policy Guidelines and not rely on the statement that Brentwood is a borough of villages.</i></p>	The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood).	No change
23719 - S&J Padfield and Partners (SJP) [6122] 23745 - St Modwen Properties PLC [5124]	Support	<p>Support the wording of policies SO1 and SO3 in particular. It is critical that these objectives are carried forward into the detailed policies and allocations of the Local Plan. We welcome the recognition of the importance of the economic climate to the borough's communities.</p> <p><i>No change proposed</i></p>	Support welcomed	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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3.16

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24816 - Mrs Susan Webb [4919]	Object	<p>The access to/from Red Rose Lane is completely unsuitable for the addition of over 70 properties. This is a single track road, and is already dangerous for walkers and horse riders. Adding the extra volume of traffic on this road is completely unsuitable. The village has already been subject to serious flooding in recent years, most recently being 3 years ago, when several houses on the Green were flooded. Additionally several of the surrounding roads (including Red Rose Lane) were impassable. Adding over 70 properties with their associated run-off will cause further flooding problems. The sewerage, electricity and other utilities were not designed to cope with an additional 70 properties. There has been no clear housing strategy for the North of the Borough. Whilst there are many options that could be considered for building houses in the North of the Borough, it is as if Blackmore has been chosen with virtually no other options being considered and others - such as Honey Pot Lane and Red Rose Farm - completely ignored or withdrawn. There has been no 'Housing Needs' survey carried out which would demonstrate why Blackmore has been included in the LOP, and why other areas have not. The survey carried out by local reps has been entirely ignored. There are Brownfield sites available nearby (Red Rose Farm as one example) but there is no evidence these have been considered in preference to using greenfield, Green Belt. The infrastructure (bus services, roads, village facilities, doctors, school) simply cannot cope with such a large increase of people. Other more suitable locations (eg areas around Doddinghurst, urban extensions to Brentwood, increasing the size of the Dunton Hills proposal) which all have better transport links would have been a far better proposal than the development in Blackmore which is not a sustainable development proposal. 12. The pieces of land proposed in Blackmore are important wildlife and natural habitats for rare species such as newts and other creatures. The Local Development Plan proposal includes a plan to regularise an unauthorized traveller site on the Chelmsford Road (at Oak Tree Farm-plots 1,2,3). This will add to further overcrowding in the village and of its services.</p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>My modification would be that sites R25 and R26 should be removed from the LDP and that Planners should refer to the BVHA 'neighbourhood plan'. This clearly sets out our local housing needs, and would avoid further development in the Blackmore area which is an already sustainable community. Also remove the Site GT 16 - a II 8 previously unapproved pitches. Leave Blackmore IN Green Belt and restore the classification of "Rural Village in a sparse setting (which it is for roads, Buses, etc. etc. it really is) I am very unhappy that you have chosen to issue such a difficult form to complete with wholly unnecessary/inappropriate personal elements in Section A. It has taken me an unacceptable amount of time to understand and complete. I am very tempted to believe this is a deliberate attempt to stifle meaningful comment. A lot of people who hold views exactly like mine HAVE been put off from objecting because of this.</p>		
24336 - Childerditch Industrial Estate [8371]	Support	<p>Strategic Objective SO1 seeks to direct development to the most sustainable locations and this links to the proposed allocation at Childerditch Industrial Estate. the indicative proposed masterplan prepared by CMP Architects. It provides a mixture of B1, B2 and B8 uses across the site. The Estate will offer opportunities for a range of businesses seeking new premises within a highly sustainable location, which the A127 corridor offers through the proposed allocations. The indicative proposed masterplan sets out how the proposed allocation would allow for the redevelopment of the Estate and how this could come forward through a series of phased developments. This will be able to offer a number of units of varying sizes that would be suitable to a range of businesses, responding to the economic climate. The work undertaken by CMP Architects demonstrates how the Estate can be more efficiently and effectively developed, by providing a modern range of units for B1, B2 and B8 uses and associated infrastructure.</p> <p><i>No specific change proposed</i></p>	Support welcomed.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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3.17

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24817 - Mrs Susan Webb [4919]	Object	<p>The access to/from Red Rose Lane is completely unsuitable for the addition of over 70 properties. This is a single track road, and is already dangerous for walkers and horse riders. Adding the extra volume of traffic on this road is completely unsuitable. The village has already been subject to serious flooding in recent years, most recently being 3 years ago, when several houses on the Green were flooded. Additionally several of the surrounding roads (including Red Rose Lane) were impassable. Adding over 70 properties with their associated run-off will cause further flooding problems. The sewerage, electricity and other utilities were not designed to cope with an additional 70 properties. There has been no clear housing strategy for the North of the Borough. Whilst there are many options that could be considered for building houses in the North of the Borough, it is as if Blackmore has been chosen with virtually no other options being considered and others - such as Honey Pot Lane and Red Rose Farm - completely ignored or withdrawn. There has been no 'Housing Needs' survey carried out which would demonstrate why Blackmore has been included in the LOP, and why other areas have not. The survey carried out by local reps has been entirely ignored. There are Brownfield sites available nearby (Red Rose Farm as one example) but there is no evidence these have been considered in preference to using greenfield, Green Belt. The infrastructure (bus services, roads, village facilities, doctors, school) simply cannot cope with such a large increase of people. Other more suitable locations (eg areas around Doddinghurst, urban extensions to Brentwood, increasing the size of the Dunton Hills proposal) which all have better transport links would have been a far better proposal than the development in Blackmore which is not a sustainable development proposal. 12. The pieces of land proposed in Blackmore are important wildlife and natural habitats for rare species such as newts and other creatures. The Local Development Plan proposal includes a plan to regularise an unauthorized traveller site on the Chelmsford Road (at Oak Tree Farm-plots 1,2,3). This will add to further overcrowding in the village and of its services.</p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>My modification would be that sites R25 and R26 should be removed from the LDP and that Planners should refer to the BVHA 'neighbourhood plan'. This clearly sets out our local housing needs, and would avoid further development in the Blackmore area which is an already sustainable community. Also remove the Site GT 16 - a II 8 previously unapproved pitches. Leave Blackmore IN Green Belt and restore the classification of "Rural Village in a sparse setting (which it is for roads, Buses, etc. etc. it really is) I am very unhappy that you have chosen to issue such a difficult form to complete with wholly unnecessary/inappropriate personal elements in Section A. It has taken me an unacceptable amount of time to understand and complete. I am very tempted to believe this is a deliberate attempt to stifle meaningful comment. A lot of people who hold views exactly like mine HAVE been put off from objecting because of this.</p>		
22365 - Sport England (Mr. Roy Warren) [4294]	Support	<p>Support is offered for including a strategic objective (SO2) which seeks to promote design to encourage healthy active lifestyles. This would accord with Government policy in paragraph 91 of the NPPF and Sport England's 'Towards an Active Nation' strategy.</p> <p><i>No change proposed</i></p>	Support welcomed	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>3.18</b>				
24337 - Childerditch Industrial Estate [8371]	Support	<p>Strategic Objective SO3 supports opportunities that respond to the changing economic climate. Childerditch Industrial Estate is a traditional industrial estate that has developed over many years, as illustrated in the indicative proposed masterplan prepared by CMP Architects. It provides a mixture of B1, B2 and B8 uses across the site. The Estate will offer opportunities for a range of businesses seeking new premises within a highly sustainable location, which the A127 corridor offers through the proposed allocations. The indicative proposed masterplan sets out how the proposed allocation would allow for the redevelopment of the Estate and how this could come forward through a series of phased developments. This will be able to offer a number of units of varying sizes that would be suitable to a range of businesses, responding to the economic climate. The work undertaken by CMP Architects demonstrates how the Estate can be more efficiently and effectively developed, by providing a modern range of units for B1, B2 and B8 uses and associated infrastructure.</p> <p><i>No change proposed</i></p>	Support welcomed.	No change
22367 - Sport England (Mr. Roy Warren) [4294]	Support	<p>Support is also offered for the strategic objective (SO3) which seeks to sustain active communities through community and social infrastructure. This would accord with Government policy in paragraphs 91 and 92 of the NPPF and Sport England's 'Towards an Active Nation' strategy.</p> <p><i>No change proposed</i></p>	Support welcomed	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24023 - Ms. Isobel McGeever [7286]	Support	<p>The Council aim to highlight opportunities which flexibly respond to the changing economic climate and employment sector trends making citizens feel economically empowered to enjoy and benefit from the necessary community/social infrastructure that sustains inclusive, informed, vibrant, active and cohesive communities. The potential for the Brentwood Community Hospital site to be developed for residential would help the Council to meet their identified and growing need for housing over the plan period. The sustainable location of the site in relation to the existing built form and settlement of Brentwood means that should the site ever become surplus to the requirements of the NHS, it would be a great location for residential development. The site is adjoined to the settlement, so therefore can help contribute towards creating a cohesive community.</p> <p><i>Should any part of the Brentwood Community Hospital site be declared as surplus to the operational healthcare requirements of the NHS in the future, then the site should be considered suitable and available for alternative use, and considered deliverable within the period 5- 10 years. These representations identify the sites potential for future development, in accordance with the realignment of the Green Belt so that this significant area of developed land is no longer included. It is evident, that the site does not make a positive contribution towards the purposes of the Green Belt set out in the NPPF. Accordingly, redevelopment of this site could provide a key contribution to Brentwood's housing need, which the Council have failed to justify, given the reliance on key strategic sites, and the lack of acknowledgement for unmet need arising from neighbouring authorities (Basildon and Havering). These representations therefore promote and identify parts of the Brentwood Community Hospital site as a suitable site to contribute towards these requirements. This site presents an excellent opportunity for a high quality residential redevelopment on previously developed Green Belt land. This could be achieved without compromising the character of the area as the development can act as an infill site to the existing residential development surrounding it, and without the need for significant infrastructure. Furthermore, the site is also available to accommodate further</i></p>	Support welcomed.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>health related development should the CCG seek to expand their services in this location, including the possible expansion of the hospital to provide more comprehensive services for the community. However, the site's Green Belt designation would make it difficult for any planning application proposing additional built form to provide further healthcare services to be considered acceptable. The subject site is considered available, suitable and deliverable within the 5-10 year period of the plan.</p>		
24104 - Freeths LLP (Mr Paul Brailsford) [5642]	Support	<p>Support the flexibility provided in paragraph 9.226 is consistent with the fact that the emerging Plan recognises the importance of providing a wide range of employment opportunities. Strategic Objective SO3 - Deliver sustainable communities with diverse economic and social cultural opportunities for all - identifies the need for "opportunities which flexibly respond to the changing economic climate and employment sector trends".</p> <p><i>No change</i></p>	Support welcomed	No action
<b>3.19</b>				
22307 - Essex Bridleways Association (Mrs Sue Dobson) [3855]	Object	<p>SO4: the aspiration for green infrastructure is welcome, but we feel that the principle of access for all within any such green spaces should be embedded within this Plan from the top down; therefore, the Strategic Objectives of the Plan should contain this principle.</p> <p><i>To make this Plan sound, we suggest that this objective is reworded thus: '...enhanced and integrated back into the built environment through accessible multi-functional green and blue infrastructure'.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22279 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>4. Consistent with National Policy To ensure that the Objective is in line with Paragraph 174 b) of the NPPF.</p> <p><i>Amend S04 as follows: S04: Deliver Beautiful, Biodiverse, Clean and a Functional Natural Environment, Where resources are carefully managed to avoid adverse impact and provide net gains for biodiversity; and where our natural heritage is protected, and ecosystem services are restored, enhanced and integrated back into the built environment through multi-functional green and blue infrastructure and opportunities are pursued for securing measurable net gains for biodiversity.</i></p>	Noted.	No change.
22294 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Support	<p>We welcome the aspirations of this strategic objective with the caveat that the wording should be amended to include mention of biodiversity, as follows:</p> <p>"...where our natural heritage and biodiversity are protected and enhanced..."</p> <p><i>No change proposed</i></p>	Support welcomed	No further change
<i>Growth Areas</i>				
23382 - BJ Associates [8317]	Object	<p>The preferred strategy results in an unsustainable pattern of development. This is due to the fact that a number of the proposed strategic housing allocations are less sustainable and appropriate than unallocated alternatives.</p> <p><i>Allocation of the Roman Road Site for Housing and or Specialist accommodation for older people.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23289 - West Horndon Parish Council (Mr Kim Harding) [381] 23292 - West Horndon Parish Council (Mr Kim Harding) [381]	Object	<p>Concern that the spatial strategy presented fails to adequately justify or demonstrate what improvements are needed to the transport network and whether the costs can be addressed by investment which can reasonably be expected to come from development and other sources. In this regard, it is important to be clear that Brentwood borough is not the only local authority area along the A127 Corridor. Basildon, Thurrock, Castle Point, Rochford and Southend-on-Sea are also planning for growth and will also be relying on the A127 Corridor to support increased movement by all modes. The Plan fails to properly consider this.</p> <p>Question the deliverability of the proposals in the Reg 19 Plan along the A127 Corridor. The current A127 does not qualify for RIS funding. Once the true cost of mitigation of the junctions along the A127 to address Local Plan growth has fully taken into account the cost of land acquisition and utilities, it will require funding from other sources. In the presentation of the A127 Economic Growth Corridor Task Force in November 2018, options for consideration include re-trunking of the road but no progress has been made in this regard therefore this cannot be part of the evidence base.</p> <p><i>Identify mitigation along A127 corridor</i></p>	Noted.	No change.
22604 - Cllr Philip Mynott [8283]	Object	<p>The Central Brentwood Growth Corridor cannot sustain the proposed level of development, and the R16/R17 site conflicts with NPPF paragraph 134.</p> <p><i>Fundamental reassessment of the plan.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22484 - Hallam Land Management Limited [8258]	Object	<p>In identifying the A127 corridor as the other key axis, the Spatial Strategy is reliant upon the delivery of a significant level of growth away from where the vast majority of housing and employment needs of the Borough are derived.</p> <p>The Local Plan proposes that more than half of the total allocations are located in the A127 corridor. There is an imbalance here. Therefore, if further growth is necessary as representations made in relation to housing need and requirement suggest, the Central Brentwood Growth Corridor should be considered first, ahead of any further growth within the A127 corridor.</p> <p><i>Further growth should be directed towards the Central Brentwood Growth Corridor</i></p>	Noted.	No change.
22698 - D. Rawlings [1058]	Object	<p>There is no clear strategy for the villages in the north of the borough, including Blackmore. Brentwood Borough Council has not consulted adequately with neighbouring authorities, e.g. the construction of circa 30 properties at the top of Fingrith Hall Lane and its impact on the village. There are far more suitable and sustainable locations for development adjacent to the urban area of Brentwood and other brownfield sites should take priority over the development of greenfields / green belt land of off Red Rose Lane</p> <p><i>Remove sites R25 and R26 from the plan</i></p>	Noted.	No change.
23288 - West Horndon Parish Council (Mr Kim Harding) [381]	Support	<p>Whilst it is questionable as to whether growth along a road corridor can ever constitute sustainable development given the detrimental effects of increased car use on climate change and air pollution, the stated principle is supported.</p> <p><i>no change proposed</i></p>	Support welcomed	No further action
3.21				
23793 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738] 23811 - Mr Carl Croll [8053]	Support	<p>Paragraph 3.21 (b) of the PSLP states that brownfield opportunities will be taken to effectively meet local needs, such as the residential-led, mixed-use redevelopment of existing industrial land in West Horndon. We agree with this approach.</p> <p><i>No change proposed</i></p>	Support welcomed	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Key Diagram</i>				
22280 - Essex County Council (Mrs Anne Clitheroe) [6776] 22486 - Hallam Land Management Limited [8258]	Object	In respect of the Green Wedge arrow to the west of Brentwood, it doesn't separate any settlements given it is such a wide tract of land. Furthermore, this tract of land doesn't separate Brentwood from Pilgrim's Hatch because they are joined to the north and will be further joined by proposed site allocations R16 & R17. Clearly, these Green Wedges have informed the Spatial Strategy but when considering the Key Diagram, they do not all serve the function as expressed in paragraph. 8.93. Further analysis of the Green Belt, landscape and settlement coalescence is submitted with these representations.  <i>Remove the north west green wedge symbol from the Key Diagram.</i>	Noted.	No change.
<i>Figure 3.1: Key Diagram</i>				
23746 - St Modwen Properties PLC [5124]	Support	The identification of an employment-led development in the south-west of the borough is supported. Such a location is well-connected to the strategic highway network, which as set out above, facilitates connections to other key employment centres. As such, the proposed approach in this regard is justified.  <i>No further change proposed</i>	Support welcomed	No further action required
24338 - Childerditch Industrial Estate [8371]	Support	Figure 3.1 provides a visual aid in support of the Spatial Strategy. It identifies Junction 29 of the M25 as a key location for 'Employment-led development' (Brentwood Enterprise Park) and Childerditch Industrial Estate as a location for new 'Employment land', in addition to the strategic housing-led development at Dunton Hills and the redevelopment of West Horndon. A focus on employment growth along the A127 corridor will reduce the need for additional employment sites in less sustainable locations elsewhere in the Borough. This approach is fully supported and recognizes the importance of this location for new employment opportunities. This approach is justified and demonstrates that the Plan is consistent with national policy in this respect.  <i>No change</i>	Support welcomed	No further action

Figure 3.1: Key Diagram

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Using Land Sequentially</i>				
24730 - Mr Stephen Downton [8432]	Object	Unsound. Unnecessary use of Green Belt land when Brownfield sites are available.  <i>Smaller and more disperement (on preferably Brownfield sites) for any new builds in the surrounding area, rather than focusing such large development within an already stretched pretty village.</i>	Noted.	No change.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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3.23

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24173 - Redrow Homes (Jenny Massingham) [7948]	Object	<p>The NPPF 2018 has two main stipulations relating to alterations of Green Belt boundaries: "136. (part) Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries..." "137 (part) Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.." The second requirement should be conducted before the first. The Council's overall approach to site selection summarised in Figure 7 of that document and in para 3.23 of the Draft Plan. This sequential approach includes brownfield sites in the Green Belt but not greenfield sites in the Green Belt. Furthermore para 3.23 confuses a number of site selection criteria, for example proximity to transport facilities, as well as the key quality of the sites.</p> <p><i>Redrow Homes propose: 1- A new policy to follow on from Policy SP02, in Chapter 4 (Managing Growth): Alteration of Green Belt Boundaries The areas of land covered by the following policies are removed from the Green Belt: RO3, (and all others concerned) The Council has arrived at these alterations on the basis of a sequential examination of brownfield and other sites not in the Green Belt, of a review of densities of development and of discussions with neighbouring local authorities to test the scope for them meeting some of the need for housing arising in Brentwood. The exceptional circumstances that justify the alterations are the severe shortage of land not within the Green Belt and suitable for development, making it impossible for the Council to meet its housing need other than through limited alterations of Green Belt boundaries. The Council has selected sites for boundary alterations where there will be least harm to the purposes of the Green Belt. 2- A new line to be added in the sequential test set out in para 3.23 Using Land Sequentially and the table revised to focus on land types: - Brownfield land within urban areas - Greenfield land within urban areas - Brownfield land within the Green Belt - Greenfield land within the</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Green Belt 3- Policy NE13 (Site Allocations in the Green Belt) is altered as follows: These sites will be de-allocated from the Green Belt to allow development to take place... 4- Para 8.117 is deleted.</i>				
23674 - Gladman Developments [2774]	Object	<p>Plan sets out within the Settlement Hierarchy in Table 2.3 that the development of brownfield land will be prioritised. This requirement has no support in National Policy as Para 117 of the Revised Framework (2019) simply states that substantial weight should be given to the value of using suitable brownfield land. This requirement should therefore be changed to reflect Government guidance. The prioritisation of brownfield land is also repeated in the Spatial Development Principles section under Paragraph 3.23 which similarly needs amending.</p> <p><i>Reflect government guidance - amend this paragraph to reflect that "states that substantial weight should be given to the value of using suitable brownfield land".</i></p>	Noted.	No change.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24269 - Strutt & Parker LLP (Mr. Andy Butcher) [2741] 24312 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Object	<p>A total of 7,752 dwellings be provided in the Borough between 2011-2033 with 310 homes per year to 2022/23 and then 584 per year from 2022/23 taking forward a "stepped delivery" approach to deal with a projected shortfall in the first 5 years of the PSLP. This is mainly because a greater proportion of homes to be delivered in the PSLP comprise sites located in the Green Belt, resulting in longer lead in times to delivery. Whilst we do not raise objections in principle to the stepped approach as far as our clients are concerned there is a prospect that some sites in the Green Belt have the prospect of coming forward earlier, particularly smaller and medium sized developments. This certainly includes this site R24, and R23 that is the subject of a separate representation. The stepped approach proposed, there are still issues with BBC's over-optimistic estimates and assumptions on the delivery of larger strategic sites proposed for allocation in the PSLP. Of the new allocations, 4,578 homes are made up of strategic allocations (of which 2,700 are at DHGV and are to be delivered in the Plan period) and 1,510 are other allocations. The strategic sites therefore represent 68% of the total number of new homes of which some 59% are allocated at DHGV. The ability of larger strategic sites to come forward quickly has been the subject of recent assessments in the Independent Review of Build Out, the Letwin Review (2018); and issues with their complexity, have been ably set out in the Lichfield's study From Start to Finish (2016). Both provide empirical evidence that the early delivery of such sites can be problematical due to a range of factors, including establishing required infrastructure requirements and the timing of housing delivery associated with those requirements, as well as the prolonged or protracted nature of the planning process. The Lichfield's report confirms that the planning process takes, on average, 2.5 years for the planning application determination period for up to 500 units; this can double for sites over 1,000 units. Two of the strategic sites within the PSLP's allocations also comprise developed sites currently in employment uses. The strategic sites are expected to deliver some 1555 homes within 5 years of an assumed adoption in 2020/21. Given the issues set out above it is considered that this is unrealistic and it</p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>would not be justified or the most appropriate strategy to rely on these sites for short term housing delivery. Therefore emphasises the need to review the ability of smaller or medium sized sites such as R23 and R24 to provide for greater flexibility and more homes which have a far greater prospect for short term delivery to ensure the Local Plan is sound.</p> <p><i>Need to review the ability of smaller or medium sized sites such as R23 and R24 to provide for greater flexibility and more homes which have a far greater prospect for short term delivery to ensure the Local Plan is sound.</i></p>		
24125 - Ford Motor Company (Mr Clive Page) [3769]	Support	<p>Ford wishes to voice support for the spatial strategy set out within the PSD which seeks to prioritise brownfield sites wherever suitable, making efficient use of land in urban areas. In this regard, Ford wishes to highlight the suitability of the land at Eagle Way for residential development in supporting this endeavour - which is located within the established urban neighbourhood of Warley (recognised as being the priority settlement for housing growth). As such, the delivery of housing at the Ford site should be viewed as a vital, and priority opportunity for BBC in recognising that the Borough is heavily constrained by Green Belt, whereby this has made it challenging for BBC to fully meet its development needs. Our Client therefore contends that this approach is sound but should be consistently reflected in other aspects of the Plan.</p> <p><i>Reflect this section in other aspects of the plan</i></p>	Support welcomed.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>3.24</b>				
22282 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Narrative requires clearer references to evidence base to justify spatial strategy. Relies on DHGV &amp; BEP along A127. Lack of clarity on transport impacts and infrastructure, particularly sustainable transport. LP needs supporting by transport modelling. BBC and ECC working together to progress work. BEP unclear how access can be achieved directly from J29 M25 due to LTC. BBC need to demonstrate suitable access arrangements for all modes of travel and demonstrate what discussions with HE, ECC and site promoter to ensure access arrangements are deliverable and agreed. DHGV needs to reply upon sustainable transport measures, to mitigate impacts on highway network, to be informed by outputs of transport evidence.</p> <p><i>BBC need to include within the Plan evidence, particularly in respect of transport, the site specific, local and cumulative impact on the local and strategic transport network, to demonstrate that the spatial strategy is the most appropriate.</i></p>	Noted.	No change.
<b>Borough Gateways</b>				
22421 - MR Graham Clegg [5485]	Support	<p>Borough Gateways</p> <p>I support the idea of investment in our Borough Gateways for the reasons mentioned in paras 3.25 - 3.26. In particular, I support the idea of using public art to contribute towards a sense of place and of helping to create a more distinctive "look and feel" about Brentwood. I think that street murals could be used to good effect, especially where there are blank facades to buildings. There are several candidate buildings located at our Borough Gateways where street murals could make a positive &amp; creative contribution to the Town Centre.</p> <p><i>No change proposed</i></p>	Support welcomed	No further action
23903 - Crest Nicholson Eastern [2509]	Support	<p>Support the aspiration for key allocations to deliver gateways that contribute to enhancing a positive impression of the Borough through public art and/or public realm improvements.</p> <p><i>No change proposed</i></p>	No response required	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>Chapter 4. Managing Growth</b>				
<i>Managing Sustainable Growth</i>				
24898 - Ms Doreen Greenshields [8460]	Object	<p>I consider the Local Plan to be unsound for the following reasons: 1. making infrastructure issues - other roads are flooded in this area and I suspect building on this scale will add to the problems - infrastructure parking is often a problem in Blackmore, difficult to see and no school places at present. 2. we have been told in the past that Blackmore village would not be required to access additional housing numbers. 3. We often have walkers and cyclist and horse riders in those narrow roads so more traffic could be dangerous.</p> <p><i>Please refer to BVHA report - there are brownfield sites that should be considered first - there should be proper strategies for villages north of Brentwood.</i></p>	Noted	No change
25061 - Mr Steven Jacobs [4408]	Object	N/A	N/A	No change
24510 - Mrs Terri Reed [4303]	Object	<p>R25 and R26 are unsuitable for building, they are liable to flood and the road is not suitable as it is too narrow &amp; also it regularly floods, cars get trapped. I am unaware if a housing need survey is being carried out. The infrastructure is already at bursting point. Children turned away from the local school as full; Drs surgery over stretched already; no parking in village centre. Because we are on the Brentwood borders, no account has been taken of the development being undertaken by Epping &amp; Chelmsford RIGHT ON OUR DOORSTEP, impacting on local facilities. Alternative sites have been ignored, even when more suitable, inadequate public transport - you can't live here without a car. Most families have 2 or more.</p> <p><i>Remove sites R25 and R26. Consider what Blackmore really needs not what ticks a few boxes, and what suits developers. The BHVA have worked hard to proposal alternative which are sustainable. They know the village better than the people behind the unsustainable proposal currently on the table.</i></p>	Noted	No change



<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23590 - Brentwood Bus and Rail Users' Association (Cllr David Jobbins) [4922]	Object	Congestion issue will only get worse as the number of vehicles follows the predicted increase and the addition of houses in Brentwood. Any additional or enhanced bus services into Brentwood will have to cope with increased congestion in the mornings on the A128 through Herongate and Ingrave - in fact it is difficult to see how much more traffic can be accommodated on this section of road even without additional developments. There will be consequences for parking, pollution, and viability of commercial bus services as their reliability and regularity is challenged.	Noted. Development has been focused within walking distance to public transport hubs to encourage to use of public transport.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22237 - Mr Anthony Cross [4376] 22634 - Ms Pierina Norman [8290] 22654 - Ms Gabriella Fickling [8292] 22720 - Dr Murray Wood [7003] 23025 - Mrs Ruth Dimond [4851] 23033 - Miss Emily Dimond [7227] 24387 - Mr John Fowles [8373] 24492 - Mr Albert Pardoe [8002] 24496 - Mr Richard Reed [4708] 24500 - Mr Peter Robinson [4899] 24620 - Mrs Tina Wilding [8405] 24621 - Terence Dearlove [8404] 24627 - Mr Nicholas Wilkinson [8406] 24636 - Giovanni De Domonocos [8407] 24639 - Mr Colin Wilding [8409] 24643 - Mrs Alexandre De Dominicis [6951] 24693 - Mr Desmond Temple [8420] 24716 - Anna Dunk [8426] 24804 - Heather Eltham [8449] 24822 - Mr Adrian Quick [8451] 24837 - Donna Eaton [8455] 24857 - Mrs Beryl Fox [8457] 24907 - Jacqueline Greagsby [8465] 25002 - Ms Doreen Greenshields [8460] 25014 - Mr Christopher Sanders [8474] 25032 - Ms Victoria Sanders [8482] 25036 - Ms Jill Griffiths [5024] 25067 - Diane Jones [8488] 25111 - Mr Keith Godbee [4942] 25160 - Iris Jones [8495] 25371 - Mr Gary Sanders [4923] 25399 - Mrs Debbie Stevens [8509] 25401 - Mr Craig Stevens [4958] 25405 - Mrs Malanie Sanders [8511] 25449 - Hazel Mills [8523]	Object	Inclusion of site allocations R25 and R26 in the LDP are inappropriate, unsound and not compliant with legal requirements on the following grounds: failure to prove that more suitable (brownfield) sites do not exist in the borough, or that other site allocations couldn't absorb the 70 dwellings proposed; inadequate consultation with adjoining boroughs and failure to properly consider the impact of other nearby developments on Blackmore; failure to recognise the increased flood risk resulting from the proposed development; adverse impact on roads including parking in village centre, noise levels and safety of existing road users from increased traffic; inadequate local amenities/services, impact on local school, already at capacity, GP is full and has long waiting times; failed to provide a development strategy for the boroughs northern villages. Need to carry out a local housing need survey in the village. Consider the impact on the historical heritage of the village. Proposal is damaging to village.	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25453 - Edward Mills [8524] 25457 - Mr Anthony Nicholson [4709] 25460 - Doddinghurst Infant School (Ms. Ingrid Nicholson) [4339] 25463 - Mr Terry Sands [8525] 25505 - Mrs Gladys Skinner [8540] 25538 - Mrs Gillian Romang [8107] 25545 - Mrs Alison Ratcliffe [5040] 25550 - Mr Richard Romang [6974] 25557 - Mrs Brigid Robinson [4897] 25597 - Mr Matthew Romang [8565] 25694 - MRS LESLEY LYNN [5591] 25818 - Mrs Carol Holmes [4693] 26093 - Mr David Holland [8676] 26120 - Mr. James Harris [8678] 26125 - Mr Adam Harris [8679] 26131 - Mrs Beverley Holla [8680] 26135 - Mrs Jane House [8681] 26138 - Mr Christopher House [8682] 26155 - Laura Harris [8685] 26160 - Susan Harris [8686] 26190 - Mrs. Susan Miers [8695] 26221 - Mr John Caton [4881] 26230 - Mrs Danielle Cross [7016] 26241 - Mrs Susan Capes [8702] 26250 - Mrs Beryl Caton [8704] 26275 - Mr Michael Williams [8706] 26280 - Mrs Julie Ann Williams [8707] 26287 - Mr John Wollaston [8183] 26290 - Mr Neil Warner [8709] 26294 - Mrs. Gillian Warner [8710] 26351 - Mr Arthur Birch [4769]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26355 - Mrs Maureen Butler [5017] 26407 - Mrs Ella Bradley [4875] 26417 - Ms Margaret Boreham [8033] 26420 - Mr David Baines [8740] 26443 - Mrs Wendy Dunbar [8743] 26456 - Mr John Orbell [4805] 26489 - Mr Surinder Panesar [8749] 26496 - Mrs Annabelle Panesar [8750]		<i>Removal of proposed development sites R25 and R26 from the plan and reallocation of the 70 dwellings to more suitable brownfield sites in the borough. Support the aims of the Blackmore Village Heritage Association and the Blackmore Village "Neighbourhood Plan"</i>		
22596 - Cllr Philip Mynott [8283]	Object	The Plan as prepared, and the site options chosen are not sustainable. Character and settlement setting of borough of villages - not preserved or enhanced, plan stifles villages by not proposing development in them and uses villages as an excuse to pile unsustainable development on the boroughs main settlement areas, in contradiction of policies within the plan. The town centre already suffers adverse road conditions, with congestions, air pollution highway safety concerns.  <i>It is not clear that growth on the scale required by central government of Local Authorities under present conditions is capable of being sustainable. Brentwood's certainly isn't.</i>	Noted	No change
25427 - Mrs Anne Sands [8514]	Object	Sections 4, 8, 9 - R25 and R26. Unsound because: too much traffic in the village, Blackmore school is bursting plus morning traffic is increasing and dangerous, Flood risk, not enough parking in the village, doctors appointments already like gold dust, narrow lanes, risk for the cyclists and horse riders. Take R25 and R26 OUT of the LDP and please consider BVHA consultation plan.  <i>Take R25 and R26 OUT of the LDP and please consider BVHA consultation plan.</i>	Noted	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
25711 - Ms Norma Jennings [5444]	Object	I am aware that it is a government diktat that Green Belt should be used to accommodate the unprecedented housing need but wonder why the enormous brownfield Clapgate scrapyards site, off Chivers Road in Stondon Massey, is not part of the equation.	The Clapgate scrapyards was considered as part of the Housing and Employment Land Availability Assessment (HELAA). The site was determined to not be suitable, available, or achievable and therefore was discounted.	No change.
23585 - Brentwood Bus and Rail Users' Association (Cllr David Jobbins) [4922]	Object	Concerned that the number and distribution of proposed new dwellings will place an impossible burden on the existing road system. With no reference in the Plan to innovative solutions such as park-and-ride, and only lip service paid to the encouragement of cycling and walking, the Association fails to see how the Plan is sustainably delivered.	The Transport Assessment has assessed the potential cumulative impact of proposals sets out within the Local Plan and has not identified any major concerns that could not be adequately mitigated, this includes the provision of sustainable transport measures.	No change
23946 - Bellway Homes and Crest Nicholson [8351]	Support	Support Brentwood's approach to meet their identified housing needs in full plus a sufficient buffer in the early part of the plan period. Crucially the draft plan is not using the JSP as a reason for deferring difficult planning decisions. As such, the draft plan is not reliant upon the emerging JSP to meet Brentwood's needs up to 2033 which would be wholly unsound.	Support Welcomed	No further action needed.
<b>4.2</b>				
23338 - Mrs Danielle Cohen [8313]	Object	No reason given	N/A	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26077 - Mrs Kate Hurford [4275]	Object	<p>The Council has Failed to fulfil its own SCI that relates to the involvement and engagement of the community and stakeholders in the exercising of its planning functions I do not believe that the local authority has fully demonstrated a willingness to engage with and take note of the opinions of the local community. No evidence of a local housing need in Blackmore supporting its inclusion in the Local Plan. The plan does not provide suitable infrastructure for the proposed new homes and does nothing to make housing affordable for people on average or low incomes. Failure to comply with guidance in the National Planning Policy Framework in respect to the construction of new buildings being inappropriate on Green Belt.</p> <p><i>A fully evidenced survey of the suitability of these proposed sites is required taking into account the obligations of the local authority to protect green belt and the heritage assets in Blackmore village. Detailed flood risk analysis is required. Assess fully any available or new currently unknown brownfield sites in more suitable locations. Meaningful consultation with neighboring authorities namely Chelmsford to consider the suitability of unmet housing needs being covered with an agreement with other authorities. Evidence and develop a strategic approach for the north of the borough.</i></p>	Noted.	No change.
25834 - Miss Jade Hayes [8136] 26003 - Mrs Shirley Holmes [8660] 26023 - Mr Ken Holmes [8662] 26363 - Mr. Christopher Burrow [4618] 26371 - Mrs Kim Barber [8731] 26379 - Mr. Colin Barber [919]	Object	<p>No local housing survey completed to prove local need. The local community have not been consulted. Blackmore is a historic village and should be protected. Inadequate infrastructure and services.</p> <p><i>Consultation is required with neighboring authorities and the local community. An assessment of local need for housing is required. A survey of traffic impact on the surrounding area is required. Detailed flood risk analysis required. Remove R25 and R26 from the plan. Planners should refer to the BCHA Neighbourhood Plan.</i></p>	Noted. The Council has undertaken a number of evidence base documents which were used to develop the local plan policies. Please refer to the Council's evidence base page to view these document.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26050 - Malcolm Hurford [7304]	Object	<p>The local plan does not fulfil the following NPPF requirements (by paragraph number): 8.a.b.c - to meet local need, accessible services. 28 the views of the local community have not been included in production of the plan. 77/78 There is no proven need for these houses. 103 This development of 70 houses will rely on private cars for transport being at least 7 miles from the nearest rail stations being accessed via local rural lanes. The limited bus services are not supportive of employment during normal working hours. Sect 14 -area known locally to flood although no focused flood risk assessment has been carried out. History of flooding shows both Chelmsford Road and Redrose Lane become impassable during heavy rainfall. 174/175 - to protect and enhance biodiversity. Section 16 - R25 and R26 have two Grade 2 listed buildings on the boundary of the development. Redrose Lane being the point of access for both developments is signed by the Highways authority as "Not suitable for heavy goods vehicles". This lane has been assessed by the local community by way of the procedure used in the Brentwood Borough Council Protected Lanes report.</p> <p><i>Consultation required with neighboring authorities this would show several developments that would impact on local services in Blackmore and cater for some local housing needs. Location needs to be re-assessed. There is no prove that Blackmore needs this number of houses being distant from transport links and there being little or no local employment. Detailed flood risk analysis required - to identify suitable locations out of flood risk areas. The historic lanes in and around Blackmore should be assessed to the established procedure and allocated "Protected Lane" status where they meet the necessary requirements. Assess possibility of smaller scale brownfield developments - support a policy of partnering owners of brownfield sites to develop local area needs where proven. Re-assess the development of sites around the transport hubs (Brentwood, Dunton, etc.) to cater for the Borough's housing needs and reduce the demands on the already stretched rural infrastructure to the north of Brentwood. Develop a strategic approach to the Villages north of Brentwood by consultation with the local community.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>POLICY SP01: SUSTAINABLE DEVELOPMENT</i>				
23337 - Mrs Danielle Cohen [8313]	Object	Object to D(a) and D(f) (no reason provided).	Noted.	No change.
24085 - LaSalle Land Limited Partnership [8362]	Object	<p>LLLP object to Policy SP01. The policy is not sound as it is not: * Consistent with the NPPF - for the reasons identified in this representation, Policy SP01 is not consistent with the NPPF and is considered to be too prescriptive with respect to Criterion D(a) and Criterion D(d). The policy is not positively framed for these criteria and would be overly restrictive for the effective consideration of future development proposals. Criterion D is over prescriptive, particularly in terms of character and setting of settlements, regarding no adverse impact on highways and makes no reference to the ability of development schemes and proposals to mitigate any adverse effects that may be identified. The policy wording needs to reflect the potential for adverse highways conditions to be mitigated through appropriate interventions such as contributions to infrastructure improvement.</p> <p><i>LLLP consider that policy SP01 requires modification at D(a) and D(d) to ensure that it is positively framed and that the approach to securing sustainable development accords with the NPPF and is more flexible.</i></p>	Noted.	No change.
22333 - Anglian Water (Mr Stewart Patience) [6824]	Object	<p>Anglian Water is generally supportive of Policy SP01 as drafted although we would ask that established uses are also included in the policy wording.</p> <p><i>has no unacceptable effect on health, the environment or amenity due to the release of pollutants (such as light, noise pollution, vibration, odour, smoke, ash, dust and grit) to land, water or air and/or from any effects from established uses which should not prejudiced by new development proposals;</i></p>	Support welcomed.	Consider including established uses in the policy wording.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22633 - Ms Pierina Norman [8290] 22653 - Ms Gabriella Fickling [8292] 22721 - Dr Murray Wood [7003] 23026 - Mrs Ruth Dimond [4851] 23038 - Miss Emily Dimond [7227] 23142 - Ms Wendy Cohen [6923] 23158 - Mr Kevin Wood [6965] 23434 - Mr Benjamin Rumary [8324] 23472 - Mr Marc Cohen [4268] 23539 - Mr David Barfoot [7177] 23553 - Mrs Janet Barfoot [7200] 23559 - Ms Eleanora Barfoot [8328] 23568 - Mrs Hayley Hammond [8329] 23572 - Sadie Barfoot [8330] 23630 - Mr Michael Evans [8332] 23778 - Mr. David Cartwright [7193] 24187 - Mr. David Cartwright [7193] 24189 - Mr. David Cartwright [7193] 24191 - Mr. David Cartwright [7193] 24193 - Mr. David Cartwright [7193] 24197 - Mrs. Margaret Cartwright [7195] 24202 - Mrs. Margaret Cartwright [7195] 24209 - Mrs. Margaret Cartwright [7195] 24215 - Mrs. Margaret Cartwright [7195] 24221 - Mrs. Margaret Cartwright [7195] 24227 - Mr Callum Cartwright [8370] 24233 - Mr Callum Cartwright [8370] 24239 - Mr Callum Cartwright [8370] 24245 - Mr Callum Cartwright	Object	The plan is unsound. The plan is deficient in respect of Blackmore village and unsound on all 4 tests in particular: There is no clear 'strategy ' for the villages including Blackmore, in the north of the borough. The principle of residential development off of Redrose Lane is wrong, Blackmore is an isolated village with modest services and infrastructure (The school is full, the doctors surgery is Doddingtonhurst is already over subscribed inadequate bus service, narrow lanes and already dangerous parking, sewerage system is overloaded already etc). There are more suitable and or sustainable locations, eg: urban extensions of Brentwood (eg Honeypot Lane), and the locations in Blackmore so not promote sustainable development. BBC has not demonstrated that there are other brownfield sites that are available and which should take priority over the Greenfield/Green Belt land off of Redrose Lane. BBC has failed to demonstrate that the required housing could not be met by increasing housing density on other (allocated) sites. There has been no 'housing needs survey' to demonstrate why Blackmore village is included in the LDP. The local authority has not followed the SCI and fully consulted with local residents and the parishes. Object to SP01 D (a) and (f) in particular. The plan overall is not the issue- Challenge policies R25 and R26/Blackmore's inclusion in the LDP solely. .Please refer to the Blackmore village survey of July 2018, which has been re-submitted. Blackmore Village Heritage Association will have an updated "Neighbourhood Plan" available. Remove sites R25 and R26 from the plan.	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
[8370] 24430 - Mr Kevin Joyner [8375] 24436 - Mrs Vicky Mumby [8378] 24456 - Mr Mark Mumby [8379] 24472 - Mr Frederick Piper [8380] 24480 - Mrs Eileen Piper [8381] 24503 - Dr Belinda Dunbar [8382] 24543 - Mrs Angela Taylor [8392] 24545 - Mr Paul De Rosa [8393] 24572 - Mrs Marion Woolaston [8397] 24577 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874] 24609 - Mr Pete Vince [8123] 24615 - Mr Lyall Vince [8403] 24650 - Mrs Karen Wood [8411] 24661 - Mrs Edna Williams [4728] 24669 - Mr Eric John Webb [1830] 24670 - Mr Eric John Webb [1830] 24677 - Ms Shirley Dearlove [8415] 24683 - Mrs Patricia Dillon [8417] 24731 - Mr Stephen Downton [8432] 24732 - Mr Stephen Downton [8432] 24733 - Mr Stephen Downton [8432] 24765 - Mrs Angela Taylor [8442] 24787 - Mrs Deborah Thwaite [8175] 24827 - Mr Ronald Quested [8452] 25499 - Mrs Melanie Simpson [8539] 25530 - Mr. James Simpson [4462] 25584 - Mr Simon Richardson [8562] 25589 - Mr Clive Rosewell [8563] 25602 - Mr David Rolfs [8566] 25608 - Mrs Yvonne Rolfs [8567] 25618 - Blackmore Village Heritage Association (Mr William				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
Ratcliffe) [4874] 25628 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921] 25629 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921] 25630 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921] 25667 - Mrs Hazel Newcombe [8597] 25670 - Mr Colin Newcombe [8598] 25675 - Miss Charlotte Newton [8599] 25788 - Mrs Pamela Bailey [8010] 25800 - Mr Matthew Ionescu [8576] 25819 - Mrs Carol Holmes [4693] 25827 - Miss Jade Hayes [8136] 25897 - Mr Peter Birch [8158] 25911 - Mr Luke Holmes [8652] 25919 - Miss Ami Holmes [8653] 25926 - Mrs Lucille Foreman [8574] 25932 - Mr Colin Foreman [4394] 25942 - Ms Deborah Cullen [4547] 25950 - Mr Ben Holmes [8654] 25958 - Mr Mark Holmes [8655] 25966 - Mr John Caton [4881] 25970 - Mrs Beryl Caton [8657] 25979 - Mr Colin Holbrook [4759] 25987 - Mrs Janice Holbrook [4700] 26001 - Mrs Shirley Holmes [8660] 26022 - Mr Ken Holmes [8662] 26041 - Mrs Nicola Holmes [8668] 26049 - Malcolm Hurford [7304] 26076 - Mrs Kate Hurford [4275] 26096 - Mr James Hughes [8677] 26149 - Mrs Gillian Hall [8684] 26152 - Mr David Hall [4867] 26174 - Mr Ken Holmes [8691] 26179 - Mrs Janet Jacobs [8692]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26198 - Mrs Jacqueline Owen [4760] 26361 - Mr. Christopher Burrow [4618] 26370 - Mrs Kim Barber [8731] 26378 - Mr. Colin Barber [919] 26423 - Mrs Rachel Caward [8742] 26439 - Mr Lee Caward [8741]		<i>The plan overall is not the issue- Challenge policies R25 and R26/Blackmore's inclusion in the LDP solely. Please refer to the Blackmore village survey of July 2018, which has been re-submitted. Blackmore Village Heritage Association will have an updated "Neighbourhood Plan" available. Remove sites R25 and R26 from the plan.</i>		
23953 - CEG Land Promotions Limited [5050]	Object	Policy SP01, Sustainable Development (page 46 - 47) Criterion B and C of Policy SP01 unnecessarily repeats the NPPF and could be removed. Criterion D(i) should be amended to reflect multiple heritage assets and conservation areas.  <i>Policy SP01 Sustainable Development (page 46 - 47) Criterion B and C of Policy SP01 unnecessarily repeats the NPPF and could be removed. Criterion D(i) should be amended to reflect multiple heritage assets and conservation areas as follows: "i. preserves, and where appropriate, enhances heritage assets and conservation areas;"</i>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23893 - Redrow Homes [6669]	Object	<p>SP01, criterion D, sub-criterion d: The wording of criterion D(d) does not reflect the wording of the NPPF at paragraph 109, which reads: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." It is therefore inconsistent with national policy. Criterion D(d) should be amended to read: d. ensures the proposal would not give rise to an unacceptable impact on highway safety, or give rise to a severe residual cumulative impact on the road network.</p> <p><i>Criterion D(d) should be amended to read:</i>  <i>d. ensures the proposal would not give rise to an unacceptable impact on highway safety, or give rise to a severe residual cumulative impact on the road network</i></p>	Noted and agreed.	Consider changing Criterion D(d) to read: d. ensures the proposal would not give rise to an unacceptable impact on highway safety, or give rise to a severe residual cumulative impact on the road network
26083 - Mrs Carole Cole [8675]	Object	<p>Concerns over schools in the area, ie more traffic in and round Blackmore, Doddinghurst and nearby villages. Also Dr's surgery seems difficult to get appointments now, without new housing in the area. Take R25 and R26 out of the plan and consider the alternatives.</p> <p><i>Take R25 and R26 out of the plan and consider the alternatives.</i></p>	Noted.	No change.
22295 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Object	<p>The policy does not fully satisfy the criteria for sustainable development.</p> <p><i>In order to comply with the requirements of the NPPF and to fully satisfy the criteria for sustainable development additional wording should be included as follows: g. takes full account of opportunities to incorporate biodiversity in developments</i>  <i>"ensuring delivery of no net loss and aiming to deliver a measurable net gain in biodiversity wherever possible"</i></p>	Noted.	Consider rewording criteria D section g to read: "ensuring delivery of no net loss and aiming to deliver a measurable net gain in biodiversity wherever possible"

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24124 - Ford Motor Company (Mr Clive Page) [3769]	Support	Ford wishes to voice support for the stated positive approach to the presumption in favour of sustainable development, which is in line with the NPPF (2018). In this regard, it is noted that the purpose of the planning system is to act positively to contribute to the achievement of this overarching objective. The Policy provides a commitment from BBC to always work 'proactively with applicants to find solutions which mean that proposals for sustainable development can be approved wherever appropriate, and to secure development that improves the economic, social and environmental conditions in the area.' Again, this is welcomed by our Client and is considered a sound approach to plan and decision making (in accordance with NPPF Paragraph 12) which we would strongly urge BBC to ensure is underpinned by all other aspects of the new Local Plan in order for it to be sound.	Support Welcomed	No further action required.
23208 - Anglian Water (Mr Stewart Patience) [6824]	Support	Suggested additional wording to refer to potential amenity impacts from existing uses as well as new development proposals. In effect we are seeking to avoid a situation where we are unable to operate our Water Recycling Centre (wastewater treatment works) on a continuous basis due to concerns raised about amenity impacts (principally odour) from development proposals in close proximity to these sites.  <i>Suggested additional wording to refer to potential amenity impacts from existing uses as well as new development proposals. We welcome the opportunity to enter into a Statement of Common Ground or similar in relation to the outstanding points set out above prior to the examination.</i>	Support Welcomed	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24016 - Croudace Strategic Ltd [2656]	Support	Policy SP01: Sustainable Development takes a positive approach towards "Presumption in Favour of Sustainable Development" and seeks to apply this in terms of planning applications, in accordance with the Development Plan. The NPPF (para 11) assumes a strong "Presumption in Favour of Sustainable Development" in all planning related matters and places a responsibility on LPAs to positively seek opportunities to meet the development needs of their area and to, as a minimum, provide for objectively assessed needs for housing and other uses. This policy is "consistent" with the NPPF and is therefore sound.	Support Welcomed	No further action required
23211 - Thames Water (On behalf of Thames Water) [1927]	Support	<p>Support the aim of Policy SP01(D). However, as worded the policy would only be effective in ensuring that development itself has no unacceptable impact on amenity. Consideration is also required to be given to whether the location of proposed development is appropriate taking into account existing sources of noise, odour and vibration to ensure that future occupiers will not be adversely affected by such issues. Where development would be affected by an existing source of pollution, development should only be allowed where it is demonstrated that suitable mitigation measures can be put in place and how these will be delivered.</p> <p><i>To address the above concern it is considered that Part D(e) of Policy SP01 could be revised to read as follows:</i></p> <p><i>"e. has no unacceptable effect on health, the environment or amenity due to the release of pollutants (such as light, noise pollution, vibration, odour, smoke, ash, dust and grit) to land, water or air, and where the amenity of future occupiers would not be adversely impacted by existing sources of such pollutants unless suitable mitigation measures are proposed and secured;"</i></p> <p><i>The additional wording would ensure that development is not located where the amenity of future residents would be affected by existing sources of pollutants unless suitable mitigation is provided. This would ensure that the policy is effective and consistent with the NPPF and therefore sound.</i></p>	Support Welcomed	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23887 - Ms. Isobel McGeever [7286]	Support	<p>The redevelopment of the Brentwood Community Hospital would aid the Council in delivering most of these objectives and policies. Although currently designated as Green Belt, the brownfield nature of the site and its location within the existing built up area of Brentwood means it can significantly aid in intensification. The site is easily accessible by existing public transport modes. The site is highly sustainable and helps contribute towards delivering the Strategic Objectives including having no unacceptable effect on visual amenity; having no unacceptable impact on health; and causes no unacceptable effects on adjoining sites.</p> <p><i>Should any part of the Brentwood Community Hospital site be declared as surplus to the operational healthcare requirement of the NHS in the future, then the site should be considered suitable and available for alternative use, and considered deliverable within the period 5-10 years. These representations identify the sites potential for future development, in accordance with the realignment of the Green Belt so that this significant area of development land is no longer included. It is evident, that the site does not make a positive contribution towards the purposes of the Green Belt set out in the NPPF. Accordingly, redevelopment of the site could provide a key contribution to Brentwood's housing need, which the Council have failed to justify, given the reliance on key strategic sites, and the lack of acknowledgement for unmet need arising from neighbouring authorities (Basildon and Havering). These representations therefore promote and identify parts of the Brentwood Community Hospital site as a suitable site to contribute towards these requirements. This site presents an excellent opportunity for a high quality residential redevelopment on previously developed Green Belt land. This could be achieved without compromising the character of the area as the development can act as an infill site to the existing residential development surrounding it, and without the need for significant infrastructure. Furthermore, the site is also available to accommodate further health related development should the CCG seek to expand their services in this location, including the possible expansion of the hospital to provide more comprehensive services for the community. However,</i></p>	Support Welcomed	No change



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>the site's Green Belt designation would make it difficult for any planning application proposing additional built form to provide further healthcare services to be considered acceptable. The subject site is considered available, suitable and deliverable within the 5-10 year period of the plan.</i>		
23910 - Essex Partnership University NHS Foundation Trust [8344]	Support	This policy advocates a positive approach to considering developments that accord with the presumption in favour of sustainable development as set out in paragraph 11 of the NPPF. Clearly this is consistent with national policy and we support this approach. Paragraph C of the policy aligns with the NPPF requirement for development that accords with the emerging Local Plan to be approved without delay unless material considerations indicate otherwise.	Support Welcomed	No further action required.
<hr/>				
<b>4.6</b>				
26097 - Mr James Hughes [8677]	Object	<p>The plan makes no provisions for the development of local amenities and infrastructure - local school and doctor's surgery are already at capacity. The internet connection is appalling, the sewage system is at tipping point, there are frequent power-cuts in the area already, Public Transport is almost non-existent in the village and parking anywhere is a nightmare.</p> <p><i>Due to issues I have made clear I believe it is the Council's duty to remove sites R25 and R26 from the LDP such that they do not overwhelm local amenities and services; such that they do not cause further flooding by removing crucial green spaces and such that they are not driving forward with plans that would adversely affect live in the surrounding areas. Blackmore is not an affordable area for young people trying to get on the 'property-ladder': so any attempt to provide affordable housing within that area is counter-intuitive.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>4.9</b>				
25835 - Miss Jade Hayes [8136]	Object	<p>There is no proven local need nor accessibility to local services. The local community has not been consulted on the LDP. A survey by a local group has been completely ignored by the Council. The Green Belt should be protected and although other sites that were looked at in the Allocation have been discounted for Green Belt impact. The local flooding in the recent past has been ignored. There is a need to 'Conserve historic environment'. The centre of the village is a conservation area. The character of Red Rose Lane an historic plague road around the village will be completely destroyed by the development.</p> <p><i>Consultation is required with neighboring authorities and the local community. An assessment of local need for housing is required. A survey of traffic impact on the surrounding area is required. There is already a development of 30 houses just outside the village that will impact the traffic flow. Detailed flood risk analysis required. Assess possibility of smaller scale brownfield developments within the area to cater for local need if any is proven. Larger developments like this should be placed nearer the transport hubs (Brentwood, Dunton, etc.) and nearer to possible employment opportunities. Develop a strategic approach to the Villages north of Brentwood by consultation.</i></p>	Noted.	No change.
26024 - Mr Ken Holmes [8662]	Object	<p>The plan is not sound. Blackmore as a village does not have the resource or infrastructure to even support a development of this scale. The roads are far too narrow to allow access on such a huge scale and the limited resources of schools and streets will not be able to cope. It appears consideration has not been given to other alternative available to the council.</p> <p><i>Site R25 and R26 should be removed from the LDP and Planners should refer to the BVHA Neighbourhood Plan which clearly sets out our local housing needs, for our already sustainable community. Consideration has not been given to the BVHA Neighbourhood plan. Also further review must take place regarding impacts and other developments in progress and brownfield opportunities</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26078 - Mrs Kate Hurford [4275]	Object	<p>The Council has Failed to fulfil its own SCI that relates to the involvement and engagement of the community and stakeholders in the exercising of its planning functions I do not believe that the local authority has fully demonstrated a willingness to engage with and take note of the opinions of the local community. No evidence of a local housing need in Blackmore supporting its inclusion in the Local Plan. The plan does not provide suitable infrastructure for the proposed new homes and does nothing to make housing affordable for people on average or low incomes. Failure to comply with guidance in the National Planning Policy Framework in respect to the construction of new buildings being inappropriate on Green Belt.</p> <p><i>A fully evidenced survey of the suitability of these proposed sites is required taking into account the obligations of the local authority to protect green belt and the heritage assets in Blackmore village. Detailed flood risk analysis is required. Assess fully any available or new currently unknown brownfield sites in more suitable locations. Meaningful consultation with neighboring authorities namely Chelmsford to consider the suitability of unmet housing needs being covered with an agreement with other authorities. Evidence and develop a strategic approach for the north of the borough.</i></p>	Noted.	No change.
26364 - Mr. Christopher Burrow [4618] 26372 - Mrs Kim Barber [8731] 26380 - Mr. Colin Barber [919]	Object	<p>No Housing Need Survey produced for the Blackmore area, therefore no justification as to why Blackmore has been selected for development.</p> <p><i>Refer to the BVHA Neighbourhood Plan - remove R25 and R26</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26322 - Mrs Sandra Wood [8720]	Object	<p>No Housing Need Survey produced for the Blackmore area, therefore no justification as to why Blackmore has been selected for development.</p> <p><i>Site R25 and R26 should be removed from the LDP. Blackmore Village Heritage Association in cooperation with the local Parish Councils will be producing a local needs plan that will look at the actual needs within the local area for what is already a sustainable community rather than producing a plan that just seeks to help the Borough Council meet its housing quota, and planners should instead refer to this and produce an updated plan in cooperation with the local community.</i></p>	Noted.	No change.
26098 - Mr James Hughes [8677]	Object	<p>The plan makes no provisions for the development of local amenities and infrastructure - local school and doctor's surgery are already at capacity. The internet connection is appalling, the sewage system is at tipping point, there are frequent power-cuts in the area already, Public Transport is almost non-existent in the village and parking anywhere is a nightmare.</p> <p><i>Due to issues I have made clear I believe it is the Council's duty to remove sites R25 and R26 from the LDP such that they do not overwhelm local amenities and services; such that they do not cause further flooding by removing crucial green spaces and such that they are not driving forward with plans that would adversely affect live in the surrounding areas. Blackmore is not an affordable area for young people trying to get on the 'property-ladder': so any attempt to provide affordable housing within that area is counter-intuitive.</i></p>	Noted.	No change.
26004 - Mrs Shirley Holmes [8660]	Object	<p>Blackmore is one of the few remaining small historical villages. It would be a terrible thing to lose such an attraction. Its wonderful church, village green and lovely country roads. The infrastructure of such a small village can't support such a level of development therefore I consider the plan to be unsound.</p> <p><i>Site R25 and R26 should be removed from the LDP and Planners should refer to the BVHA Neighbourhood Plan which clearly sets out our local housing needs, for our already sustainable community. Should not build on green belt land. Backing the BVHA.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26051 - Malcolm Hurford [7304]	Object	<p>The local plan does not fulfil the following NPPF requirements (by paragraph number): 8.a.b.c - to meet local need, accessible services. 28 the views of the local community have not been included in production of the plan. 77/78 There is no proven need for these houses. 103 This development of 70 houses will rely on private cars for transport being at least 7 miles from the nearest rail stations being accessed via local rural lanes. The limited bus services are not supportive of employment during normal working hours. Sect 14 -area known locally to flood although no focused flood risk assessment has been carried out. History of flooding shows both Chelmsford Road and Redrose Lane become impassable during heavy rainfall. 174/175 - to protect and enhance biodiversity. Section 16 - R25 and R26 have two Grade 2 listed buildings on the boundary of the development. Redrose Lane being the point of access for both developments is signed by the Highways authority as "Not suitable for heavy goods vehicles". This lane has been assessed by the local community by way of the procedure used in the Brentwood Borough Council Protected Lanes report.</p> <p><i>Consultation required with neighboring authorities this would show several developments that would impact on local services in Blackmore and cater for some local housing needs. Location needs to be re-assessed. There is no prove that Blackmore needs this number of houses being distant from transport links and there being little or no local employment. Detailed flood risk analysis required - to identify suitable locations out of flood risk areas. The historic lanes in and around Blackmore should be assessed to the established procedure and allocated "Protected Lane" status where they meet the necessary requirements. Assess possibility of smaller scale brownfield developments - support a policy of partnering owners of brownfield sites to develop local area needs where proven. Re-assess the development of sites around the transport hubs (Brentwood, Dunton, etc.) to cater for the Borough's housing needs and reduce the demands on the already stretched rural infrastructure to the north of Brentwood. Develop a strategic approach to the Villages north of Brentwood by consultation with the local community.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23339 - Mrs Danielle Cohen [8313]	Object	No reason given	N/A	No change.
<i>Local Housing Need</i>				
23646 - Countryside Properties [250] 23647 - Countryside Properties [250] 23914 - Crest Nicholson Eastern [2509]	Object	Over-reliance on DHGV: the Plan places great emphasis on the fact that DHGV was one of 14 nationally selected Garden Villages and that the Council received funding to take this forward. In reality such an investment is made at the risk of the planning and legal processes which may conclude that the proposals go no further. For example, North Essex Garden Community proposals have not been shown to be viable and deliverable after inspector found that significant further work is required to justify the proposals. It could be argued that the proposals for DHGV will suffer the same problems.  <i>The SA and evidence base do not support the spatial strategy for growth set out in the Local Plan. The Local Plan process should be suspended to allow a fundamental review of the SA.</i>	Noted.	No change.
23156 - Mr Kevin Wood [6965]	Object	Brentwood Borough Council has failed to provide a development strategy for the villages, including Blackmore, in the north of Brentwood Borough. It lacks any provision for meeting the village's needs, which have not been objectively assessed.	Noted.	No change.
23409 - Ms Dawn Ireland [4861]	Object	There has been no Housing Needs Survey to demonstrate why Blackmore is included in the LDP. [Sites R25 and R26].  <i>Please refer to "BVHA neighborhood plan ". [Not supplied].</i>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23157 - Thurrock Borough Council (Mr Richard Hatter) [2461] 23645 - Countryside Properties [250] 23656 - EA Strategic Land LLP [279] 23667 - M Scott Properties Ltd [8054] 23691 - Catesby Estates Plc. [7463] 23692 - Catesby Estates Plc. [7463] 23699 - BPM Investments Ltd [8338] 23788 - RS2 Properties Ltd [8339] 23970 - Bellway Homes and Crest Nicholson [8351] 24012 - Croudace Strategic Ltd [2656] 24065 - Countryside Properties [250] 24066 - Countryside Properties [250] 24070 - Countryside Properties [250] 24083 - Countryside Properties [250] 24086 - Countryside Properties [250] 24108 - Marden Homes Ltd [8363] 24109 - Marden Homes Ltd [8363] 24157 - Mr Mr J Nicholls and Mr A Biglin (Land owners) [8368] 24165 - Turn2us [6753] 24166 - Turn2us [6753] 24167 - Turn2us [6753]	Object	<p>The Pre-Submission Brentwood Local Plan (Regulation 19) fails to take into account the latest Government approach (as published in February 2019) to housing need assessment and use of the appropriate household and demographic data and is therefore considered unsound. The baseline housing target in the pre-submission plan of 350 dwellings per annum is now considered inappropriate and out of date. The upper end flexible target of 456 dwellings per annum is now just above the baseline requirement of 452pa as set out in the standard methodology approach. Failed to demonstrate a five-year housing land supply ('HLSS'). The Borough's most recent reported 5YHLS (Five Year Housing Land Supply Statement, November 2018) is 4.1 years. This is predicated on a requirement which, when considered in relation to the latest guidance, understates need.</p> <p><i>It is considered that the Brentwood Local Plan will need to be re-assessed in light of the implications of the Government requirement to use the standard methodology with CLG 2014-based household projections. The plan will need to be revised make provision for a higher housing target and provision for additional housing sites to provide a contingency buffer. In light of the revised housing baseline figures the SA will need to be reviewed to take account of this requirement. Technical evidence and the IDP will</i></p>	<p>The Council acknowledges that the 2014 Household Projections are required as outlined within the standard methodology. The Regulation 19 consultation had commenced prior to the publication outlining the changes to the standard methodology which originally required the 2016 household projections. The Council included a buffer to the housing target in anticipation of the possible change to the standard methodology.</p>	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p><i>need to be reviewed and where necessary amended to take account of revised housing target. The South Essex Authorities are considering the commissioning of additional elements of evidence base to support the preparation of the joint strategic planning including a further review of the South Essex SHMA that would incorporate the outcome of changes to projections and methodology referred to above. It is considered that as a partner in the joint working that Brentwood Council should include any review of its OAHN in the South Essex review SHMA.</i></p>		
23672 - M Scott Properties Ltd [8054]	Object	<p>The Plan specifies that windfall sites will deliver 41 units/year in the last 10 years of the Plan period (totalling 410 units to be delivered by windfall sites). The reliance on windfall delivering seems unjustified and undeliverable. In addition, there is no robust reason why instead of allocating windfall sites to the last 10 years of the Plan, additional smaller sites could not be allocated in order to provide greater certainty of delivery and to improve the housing land supply, especially within the 5 years of the Plan being adopted, when the housing land position is at its weakest.</p> <p><i>Release additional, suitable Green Belt sites in order to assist with the delivery of homes over the Plan period, including to meet the need for specialist housing</i></p>	Noted.	No change.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23655 - EA Strategic Land LLP [279]	Object	<p>The assertion that Brentwood is a self-contained HMA is highly questionable. In any event this does not preclude Brentwood from accommodating unmet housing needs from either London or other adjoining authorities in Essex. These representations identify the extent of unmet need in adjoining boroughs including Basildon, Havering and from the London Plan, particularly in the short to medium term which the Brentwood Local Plan fails to address. On this matter the Plan fails the soundness test as it is neither justified nor effective in terms of cross boundary strategic matters.</p> <p><i>Site West of Thorndon Avenue, West Horndon is fully in accordance with the spatial strategy focused on transit orientated growth and should be allocated. No significant constraints with developing an urban extension at West Horndon, in addition to Dunton Hills Garden Village was identified by the Sustainability Appraisal. If Brentwood is to attempt to meet the housing needs, this approach is required.</i></p>	Noted.	No change.
23908 - Essex Partnership University NHS Foundation Trust [8344]	Support	<p>The emerging Plan states it will allocate land to exceed the identified local housing need to provide flexibility in the supply and delivery of sites. We support the approach to significantly boost the supply of new housing because it demonstrates that the Plan is positively prepared. This should mean that at the site-specific level, allocations for development, including the Land at Nags Head Lane, should seek to deliver the maximum quantum of development possible, taking account of site constraints and masterplans where applicable.</p>	Support Welcomed	No further action required

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23954 - CEG Land Promotions Limited [5050]	Support	<p>Since the Regulation 19 Local Plan was published, the Ministry of Housing, Communities and Local Government has confirmed its position on the standard method for calculating housing need (19 February 2019) which is of relevant to this Plan. In response, the Council will need to update explanatory text in Chapter 4 of the Local Plan to reflect the use of 2014 rather than 2016 household projections. The Planning Practice Guidance makes clear that the standard method formula is used to identify the minimum number of new homes to be planned for and does not in itself establish a housing requirement figure. The Council's housing requirement figure is set out in the Plan at 456 dpa and this figure is in excess, albeit only slightly, of the standard method figure (452 dpa) using the 2014 projections and is sufficient. The requirements of national policy are met and the plan is sound.</p> <p>The Council states that in including its 'annual housing supply buffer' on top of the 350 dpa (derived from use the standard method calculation using the 2016 projections) it serves to safeguard against any potential uplift to the standard method, this now having materialised. This was a sensible contingency. Considering this buffer has now effectively absorbed within the updated standard method figure the Council is requested to confirm if its purpose has now been served and it intends to submit the plan to examination with the housing requirement as currently stated. CEG supports the Council's reliance on a stepped trajectory which, in accordance with the Planning Practice Guidance (paragraph 34, Ref. ID: 3-034-20180913), is appropriate in circumstances where: there is to be a significant change in the level of housing requirement between the adopted and emerging Local Plans, as is the case here; and, recognising that many sites will not be available for development until the adoption of the plan, reflecting the high proportion of designated Green Belt in the Borough. CEG is committed to bringing forward the provision of new homes on Dunton Hills Garden Village (DHGV) as early as possible in the Plan period and is working closely with the Council and Homes England to achieve this.</p>	Noted.	Amend Chapter 4 paragraphs 4.11 - 4.21 (Managing Housing Growth), to update context of calculating housing need according to the standard method as set out in Planning Practice Guidance.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24010 - Croudace Strategic Ltd [2656]	Support	We support the housing strategy for the Local Plan and welcome that BBC is seeking to meet its housing needs in full. This is particularly important having regard to the likely inability of adjacent authorities (referred to on page 5) to meet their own needs. We therefore consider the housing strategy in the Plan to be "sound" in accordance with the NPPF (Para 35).	Support Welcomed	No further action required.
23188 - Southend on Sea Council (Mr Adrian Smith) [8307]	Support	Support that you intend to accommodate your own projected need and are not seeking for neighbouring authorities to take any of your housing requirements. If this was not the case, Southend is unable to contribute to meeting other authorities need.	Support Welcomed	No further action required
23901 - Crest Nicholson Eastern [2509]	Support	The emerging Plan states it will allocate land to exceed the identified local housing need to provide flexibility in the supply and delivery of sites. We support the approach to significantly boost the supply of new housing because it demonstrates that the Plan is positively prepared. This should mean that at the site-specific level, allocations for development, including the Land at Nags Head Lane, should seek to deliver the maximum quantum of development possible, taking account of site constraints and masterplans where applicable.	Support Welcomed	No further action required
<b>4.12</b>				
23830 - Strutt & Parker LLP (Mr Alasdair Sherry) [6713]	Object	Paragraph 4.13 states the Borough's housing requirement plans for is 350 dpa. Paragraph 4.12 states that this figure has been calculated using the Standard Method, however doesn't appear to use the 2014-based subnational household projections as required by guidance; therefore when applied these figures result in a requirement of 452 dwellings per annum.	Noted	Amend Chapter 4 paragraphs 4.11 - 4.21 (Managing Housing Growth), to update context of calculating housing need according to the standard method as set out in Planning Practice Guidance.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
<i><b>4.13</b></i>				
23756 - Strutt & Parker LLP (Jen Carroll) [6751]	Object	Paragraph 4.13 states that the Borough's housing requirement is 350 dwellings per annum which was calculated using the 2016-based data and applying the standard methodology. PPG now confirms that the 2014-based subnational household projection should be used to calculate housing requirements - when applied results in a requirement of 452 dpa. PSLP only fractionally exceeds the minimum housing requirement derived from the Standard Method, and therefore does not provide any flexibility or Green Belt protection.	Noted	Amend Chapter 4 paragraphs 4.11 - 4.21 (Managing Housing Growth), to update context of calculating housing need according to the standard method as set out in Planning Practice Guidance.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24385 - Chelmsford Diocesan Board of Finance [2627]	Object	<p>The proposed period runs until 2033. Assuming - optimistically - adoption in 2019 this means that the Local Plan will address development needs for a maximum of 14 years. The NPPF (paragraph 22) is clear that strategic policies should look ahead over a minimum of 15 years. This deficiency in the PSLP is of particular relevance given that the Borough is predominantly Green Belt, and failure to ensure that development needs are planned for over a sufficient period of time would likely result in an early review of the Green Belt being required - contrary to the NPPF (paragraph 136); and undermining one of the two essential characteristics of the Green Belt: its permanence (NPPF, paragraph 133). Commentary on the Total Housing Requirement: At paragraph 4.13 of the PSLP, it states that the Borough's housing requirement it plans for is 350 dwellings per annum. At paragraph 4.12, it states that this figure has been calculated using the Standard Method (as per the NPPF and accompanying Planning Practice Guidance [PPG]). However, this does not appear to be the case having regard to updated guidance. The PPG now confirms that 2014-based subnational household projections should be used to calculate the housing requirement using the Standard Method. The relevant subnational population projections indicate an average annual increase of 293.2 households in the Borough between 2019 and 2029. The latest (2017) ratio of median house price to median gross annual workplace-based earnings for the Borough published by the ONS is 11.23. Once the Standard Method is applied using these figures this result in a requirement of 452 dwellings per annum. The Local Plan is required to meet this need as a minimum (NPPF paragraph 35); and with sufficient flexibility to be able to respond to rapid change (NPPF paragraph 11). In addition, the Local Plan is required to ensure that the revised Green Belt can endure beyond the plan period (NPPF paragraph 136), i.e. in amending the Green Belt boundary, the Local Plan should account for development needs beyond 2033 (or, more appropriately, a revised later end to the plan period, which will ensure strategic policies will cover at least 15 years). A further factor is the need to consider unmet needs of neighbouring authorities (NPPF paragraph 35). In this respect, we note in particular</p>	Noted	Amend Chapter 4 paragraphs 4.11 - 4.21 (Managing Housing Growth), to update context of calculating housing need according to the standard method as set out in Planning Practice Guidance.

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
		<p>that Epping Forest District Council is at an advanced stage in the preparation of a Local Plan (at the time of writing it is currently being examined) which proposes to deliver 11,400 dwellings between 2011 and 2033 (518 dwellings per annum), against a requirement (based on the Standard Method) of 944 dwellings per annum. We are not aware of Brentwood Borough Council having objected to this approach, but neither is there any indication that the PSLP addresses any of this unmet need. The PSLP considers it appropriate to apply a 20% uplift to the identified housing target of 350 dwellings per annum, resulting in a proposed target of 456 dwellings per annum. The PSLP's rationale for this buffer is somewhat unclear: it states at Figure 4.1 that the buffer allows for an additional housing land supply to be maintained in the Borough throughout the plan period; but states at footnote 2 that the housing supply buffer serves to safeguard against any potential uplift to the standard methodology for calculating housing need, pending the outcome of the Government's 'Technical consultation on updates to national planning policy and guidance'. In any case, the uplift means that the proposed annual housing target in the PSLP is only fractionally above the minimum housing requirement derived from the Standard Method, and does not provide any flexibility to ensure needs are met; does not ensure the Green Belt will endure beyond the plan period; and does not account for unmet need in neighbouring authorities.</p> <p><i>In respect of the plan period, and the PSLP's failure to ensure strategic policies are in place to cover at least 15 years from adoption, as an absolute minimum the PSLP must be amended to ensure an additional year's worth of housing need can be accommodated. Given likely timescales for adoption of the Local Plan, we suggest a plan period to 2035 should be treated as a minimum, and an additional two years' worth of development needs to that which the PSLP currently seeks to address should be planned for. Whilst we suggest 2035 should be treated as the earliest end to the plan period, it should also be recognised that the authority is predominantly Green Belt. The NPPF requires this Local Plan to ensure the Green Belt will endure beyond the plan period. As such, we suggest the PSLP that even if the plan period is</i></p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>extended until 2035, policies should account for potential development needs beyond this period</i>				
<i>4.15</i>				
23103 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>The housing target for Brentwood as approved in November 2018 is likely to be subject to a recalculation following Government's indication that it will make clear in national Planning Practice Guidance that the 2014-based CLG Household Projections should be used instead of the 2016-based ONS Household Projections; which identified an OAN for Brentwood is 452 homes per annum. This could cause the plan to be less effective and justified.</p> <p><i>1) The Local Plan must be adjusted to incorporate previously discounted development sites, particularly in the Central Brentwood Growth Corridor to restore the flexibility in site supply across a broader range of spatial locations, thereby improving the Plan's effectiveness and deliverability. 2) The methodology to the Local Plan's Housing Trajectory needs to be published and open for comment and challenge of its assumptions</i></p>	<p>The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough.</p>	<p>Amend Chapter 4 paragraphs 4.11 - 4.21 (Managing Housing Growth), to update context of calculating housing need according to the standard method as set out in Planning Practice Guidance.</p>
<i>4.16</i>				
23104 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>The housing target for Brentwood as approved in November 2018 is likely to be subject to a recalculation following Government's indication that it will make clear in national Planning Practice Guidance that the 2014-based CLG Household Projections should be used instead of the 2016-based ONS Household Projections; which identified an OAN for Brentwood is 452 homes per annum. This could cause the plan to be less effective and justified.</p> <p><i>1) The Local Plan must be adjusted to incorporate previously discounted development sites, particularly in the Central Brentwood Growth Corridor to restore the flexibility in site supply across a broader range of spatial locations, thereby improving the Plan's effectiveness and deliverability. 2) The methodology to the Local Plan's Housing Trajectory needs to be published and open for comment and challenge of its assumptions.</i></p>	<p>The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough.</p>	<p>Amend Chapter 4 paragraphs 4.11 - 4.21 (Managing Housing Growth), to update context of calculating housing need according to the standard method as set out in Planning Practice Guidance.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Figure 4.1: Annual housing requirement and supply buffer</i>				
23831 - Strutt & Parker LLP (Mr Alasdair Sherry) [6713]	Object	The PSLP's rational for a 20% buffer is unclear. states at Figure 4.1 that the buffer allows for an additional housing land supply to be maintained in the Borough throughout the plan period; but states at footnote 2 that the housing supply buffer serves to safeguard against any potential uplift to the standard methodology for calculating housing need, pending the outcome of the Government's 'Technical consultation on updates to national planning policy.	Noted.	Amend Chapter 4 paragraphs 4.11 - 4.21 (Managing Housing Growth), to update context of calculating housing need according to the standard method as set out in Planning Practice Guidance.
<i>4.20</i>				
26099 - Mr James Hughes [8677]	Object	<p>The plan makes no provisions for the development of local amenities and infrastructure - local school and doctor's surgery are already at capacity. The internet connection is appalling, the sewage system is at tipping point, there are frequent power-cuts in the area already, Public Transport is almost non-existent in the village and parking anywhere is a nightmare.</p> <p><i>Due to issues I have made clear I believe it is the Council's duty to remove sites R25 and R26 from the LDP such that they do not overwhelm local amenities and services; such that they do not cause further flooding by removing crucial green spaces and such that they are not driving forward with plans that would adversely affect live in the surrounding areas. Blackmore if not an affordable area for young people trying to get on the 'property-ladder': so any attempt to provide affordable housing within that area is counter-intuitive.</i></p>	Noted	No change



<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
26323 - Mrs Sandra Wood [8720]	Object	<p>No Housing Need Survey produced for the Blackmore area, therefore no justification as to why Blackmore has been selected for development.</p> <p><i>Site R25 and R26 should be removed from the LDP. Blackmore Village Heritage Association in cooperation with the local Parish Councils will be producing a local needs plan that will look at the actual needs within the local area for what is already a sustainable community rather than producing a plan that just seeks to help the Borough Council meet its housing quota, and planners should instead refer to this and produce an updated plan in cooperation with the local community.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY SP02: MANAGING GROWTH</i></b>				
23635 - Tesco [5252] 23663 - M Scott Properties Ltd [8054] 23676 - Gladman Developments [2774] 23677 - Gladman Developments [2774] 23700 - BPM Investments Ltd [8338] 23786 - RS2 Properties Ltd [8339] 24017 - Croudace Strategic Ltd [2656] 24057 - Mr Terry Haynes [8359] 24126 - Ford Motor Company (Mr Clive Page) [3769] 24151 - Mr Mr J Nicholls and Mr A Biglin (Land owners) [8368]	Object	<p>The Plan is not compliant with NPPF, objectively assessed development needs are not met, plan period is incorrect, no five year housing land supply is demonstrated, the growth strategy is questionable, over ambitious completion rates and over reliance on strategic site. It should: * Use 2014-based household projections as basis (454 dwellings per annum); * Set a housing requirement in Policy SP02 of 9,265 dwellings (which takes account of a 20% buffer); * Re-balance the stepped trajectory approach to bring forward more housing in the first five years. This will also help address the five year housing land supply issue.</p> <p><i>* Use 2014-based household projections as basis for the Local Plan. This means local housing needs baseline is 454 dwellings per annum. * Set a housing requirement in Policy SP02 of 9,265 dwellings (which takes account of a 20% buffer). * Re-balance the stepped trajectory approach to bring forward more housing in the first five years. This will also help address the five year housing land supply issue. * Undertake additional work in respect of Duty to Co-operate, Sustainability Appraisal and Habitats Regulation Assessment. This is required to comply with the NPPF (2019) and legal tests. * Undertake updated Green Belt assessment. * Identify the Hopefield Site as a Housing Allocation in the new Local Plan as part of the revised and sound development strategy. This is required to address the above matters especially in relation to delivering the growth strategy and meeting five year housing land supply. * Remove stepped approach and release more small green belt allocations.</i></p>	<p>The Council acknowledges that the 2014 Household Projections are required as outlined within the standard methodology. The Regulation 19 consultation had commenced prior to the publication outlining the changes to the standard methodology which originally required the 2016 household projections. The Council included a buffer to the housing target in anticipation of the possible change to the standard methodology. The Council has updated all the relevant evidence base documents, such as an updated Green Belt Review, and they are published on our website.</p>	<p>Amend Chapter 4 paragraphs 4.11 - 4.21 (Managing Housing Growth), to update context of calculating housing need according to the standard method as set out in Planning Practice Guidance.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24267 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Object	<p>A total of 7,752 dwellings be provided in the Borough between 2011-2033 with 310 homes per year to 2022/23 and then 584 per year from 2022/23 taking forward a "stepped delivery" approach to deal with a projected shortfall in the first 5 years of the PSLP. This is mainly because a greater proportion of homes to be delivered in the PSLP comprise sites located in the Green Belt, resulting in longer lead in times to delivery. Whilst we do not raise objections in principle to the stepped approach as far as our clients are concerned there is a prospect that some sites in the Green Belt have the prospect of coming forward earlier, particularly smaller and medium sized developments. This certainly includes this site R24, and R23 that is the subject of a separate representation. The stepped approach proposed, there are still issues with BBC's over-optimistic estimates and assumptions on the delivery of larger strategic sites proposed for allocation in the PSLP. Of the new allocations, 4,578 homes are made up of strategic allocations (of which 2,700 are at DHGV and are to be delivered in the Plan period) and 1,510 are other allocations. The strategic sites therefore represent 68% of the total number of new homes of which some 59% are allocated at DHGV. The ability of larger strategic sites to come forward quickly has been the subject of recent assessments in the Independent Review of Build Out, the Letwin Review (2018); and issues with their complexity, have been ably set out in the Lichfield's study From Start to Finish (2016). Both provide empirical evidence that the early delivery of such sites can be problematical due to a range of factors, including establishing required infrastructure requirements and the timing of housing delivery associated with those requirements, as well as the prolonged or protracted nature of the planning process. The Lichfield's report confirms that the planning process takes, on average, 2.5 years for the planning application determination period for up to 500 units; this can double for sites over 1,000 units. Two of the strategic sites within the PSLP's allocations also comprise developed sites currently in employment uses. The strategic sites are expected to deliver some 1555 homes within 5 years of an assumed adoption in 2020/21. Given the issues set out above it is considered that this is unrealistic and it</p>	Noted.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>would not be justified or the most appropriate strategy to rely on these sites for short term housing delivery. Therefore emphasises the need to review the ability of smaller or medium sized sites such as R23 and R24 to provide for greater flexibility and more homes which have a far greater prospect for short term delivery to ensure the Local Plan is sound.</p> <p><i>Need to review the ability of smaller or medium sized sites such as R23 and R24 to provide for greater flexibility and more homes which have a far greater prospect for short term delivery to ensure the Local Plan is sound.</i></p>		
23894 - Redrow Homes [6669]	Object	<p>The housing requirement set out in SP02 is based on an out-of-date method for calculating the LHN. The most recent advice is that the 2014 HHP should be used. The 2014 HHP with the 2017 affordability ratios applied reveal that the base need is 452, not 350. Although this is broadly similar to the 456 per annum figure in the policy, it does not allow for the buffer that the Council has considered necessary. This raises potential consistency issues with national policy that may influence the ability of the plan to deliver the housing required to fulfil the identified need.</p> <p><i>For the reasons explained above, the justification for the housing requirement figure will need to be reviewed and updated accordingly. The Council will need to ensure that it can robustly defend the figure that it has put forward. The current wording of the supporting text and the evidence base referred to does not currently provide a robust defense.</i></p>	<p>The Council acknowledges that the 2014 Household Projections are required as outlined within the standard methodology. The Regulation 19 consultation had commenced prior to the publication outlining the changes to the standard methodology which originally required the 2016 household projections. The Council included a buffer to the housing target in anticipation of the possible change to the standard methodology.</p>	<p>Amend Chapter 4 paragraphs 4.11 - 4.21 (Managing Housing Growth), to update context of calculating housing need according to the standard method as set out in Planning Practice Guidance.</p>

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22475 - Hallam Land Management Limited [8258]	Object	<p>The annual housing need in the BBDP should be adjusted to 452 dpa, using the standard method. An allowance may be necessary for unmet housing needs arising from neighbouring areas. Provide a housing supply buffer of 20% to allow for flexibility in meeting the requirement. Provision should therefore be 9,214 dwellings (542 dpa) in the plan period 2016 to 2033. A five-year supply on adoption cannot be demonstrated. The stepped trajectory should be consistent with the start of expected completions from strategic allocations. The plan period should be extended to a minimum of 15 years from adoption.</p> <p><i>The Local Plan must be amended to reflect the most up-to-date approach to assessing the local housing need, and take into account unmet housing needs from neighbouring areas when establishing its housing requirement. The total housing supply must demonstrate that it provides a sufficient supply and mix to meet the requirement, including for the first five years of the Plan period. The stepped trajectory must be consistent with the evidence as to when strategic Green Belt allocations will start delivering. The Local Plan should plan for a minimum of 15 years from adoption.</i></p>	Noted	Amend Chapter 4 paragraphs 4.11 - 4.21 (Managing Housing Growth), to update context of calculating housing need according to the standard method as set out in Planning Practice Guidance.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23159 - Thurrock Borough Council (Mr Richard Hatter) [2461]	Object	<p>Thurrock Council seeks further clarification as to whether level of growth proposed for Brentwood could be accommodated in the plan in light of the concerns with regard to the assessment of housing need being required to be altered to meet Government policy at 452 dpa and due to the current concerns regarding the proposed strategic location at Dunton Hills Garden Village to accommodate this growth. Thurrock Council would wish to further engage with Brentwood Council to discuss other alternative options in the borough including at West Horndon.</p> <p>It is considered that a number of the policies including SP02 should be amended to make reference to the circumstances and triggers in which the Brentwood Local Plan would need to be reviewed including failure to deliver the housing within the plan and /or a different spatial strategy or growth levels as a result of the policy approach following adoption of a South Essex Joint Strategic Plan.</p> <p><i>It is considered that the Brentwood Local Plan will need to be re-assessed in light of the implications of the Government requirement to use the standard methodology with CLG 2014-based household projections.</i></p> <p><i>The plan will need to be revised make provision for a higher housing target and provision for additional housing sites to provide a contingency buffer.</i></p> <p><i>It is considered that a number of the policies including SP02 should be amended to make reference to the circumstances and triggers in which the Brentwood Local Plan would need to be reviewed including failure to deliver the housing within the plan and /or a different spatial strategy or growth levels as a result of the policy approach following adoption of a South Essex Joint Strategic Plan.</i></p>	<p>The Council acknowledges that the 2014 Household Projections are required as outlined within the standard methodology. The Regulation 19 consultation had commenced prior to the publication outlining the changes to the standard methodology which originally required the 2016 household projections. The Council included a buffer to the housing target in anticipation of the possible change to the standard methodology.</p>	<p>Amend Chapter 4 paragraphs 4.11 - 4.21 (Managing Housing Growth), to update context of calculating housing need according to the standard method as set out in Planning Practice Guidance.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23654 - Gladman Developments [2774]	Object	<p>Critical to the success of the South Essex area will be the timely production of the JSP which will define the major growth areas to meet the housing and employment needs across the area and will inform the preparation of the individual Local Plans. Gladman have some fundamental concerns with the BLP, particularly with the identification of the level of housing need in the Plan and the implementation of a stepped approach to housing delivery, which would render the BLP unsound if they are not addressed. Gladman therefore request the right to participate in any forthcoming Local Plan Examination to discuss these concerns orally.</p> <p><i>Give JSP weight in plan to ensure local plans deliver JSP outcomes.</i></p>	Noted	No change
23969 - Bellway Homes and Crest Nicholson [8351]	Object	<p>We would advocate delaying submission of the plan until the 2018 affordability ratio data is released by the Office for National Statistics (the data used in the standard methodology for calculating housing need), due for publication in March/April 2019. This would allow time for factual updates to be made to Policy SP02 and housing target. Should submission come before the publication of the affordability ratio data, Brentwood should consider over allocating sites to increase the buffer of sites over for the plan period - sufficient to provide flexibility in respect of any increases brought about by the new affordability data.</p> <p><i>Delaying submission of the plan until the 2018 affordability ratio data is released or consider over allocating sites to increase the buffer of sites over for the plan period.</i></p>	Noted.	Amend Chapter 4 paragraphs 4.11 - 4.21 (Managing Housing Growth), to update context of calculating housing need according to the standard method as set out in Planning Practice Guidance.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22493 - Hallam Land Management Limited [8258]	Object	<p>There is not clear or sufficient evidence to demonstrate that the housing trajectory, in particular for the sites R01, R02, R03, R04, R05, &amp; R07, in Appendix 1 is justified as required by the Framework to demonstrate a site is deliverable. This undermines the evidence within Figure 4.2 Demonstrating Housing Provision which therefore results in Policy SP02 being ineffective and not justified.</p> <p><i>Hallam Land Management have identified in these representations (and representations made in relation to Duty to Co-operate and Housing Need and Requirement), that the housing supply identified in the Plan will not meet the housing required to be provided for within the Plan. This is both in terms of the Plan period as a whole, and in terms of the first five years of the Plan period. Additional Site Allocations are therefore necessary to make the Local Plan sound. Further, given the absence of non-Green Belt alternatives, the requirement to meet housing needs would be the exceptional circumstances for the further release of land and alterations to the Green Belt boundary as set out within the Local Plan. Hallam Land Management are of the strong view that there is a suitable site adjoining the Brentwood Urban Area that would not undermine the purposes and importance of the Green Belt if it were to be released. The site is referred to as Calcott Hall Farm, Brentwood, which is under the control of Hallam Land Management and could start delivery within five years of adoption of the Plan. The HEELA, October 2018 recognises the site as suitable, available and achievable (Site Ref 302c). Furthermore, the Sustainability Appraisal has already deemed the Site as a reasonable alternative (Table 5.2, SA of Brentwood Local Plan, January 2019). Notwithstanding the Council's position that the site is suitable, available, and achievable, Hallam Land Management have submitted with these representations a suite of technical documents that demonstrate the site is both suitable and that its development would align with the Vision, Spatial Strategy and Strategic Objectives of the Plan. The key points to note are below: Location: * As illustrated on the attached plan, the site is immediately adjacent to the Brentwood Urban Area (Settlement Category 1) as defined in the Settlement Hierarchy (Figure 2.3); * The</i></p>	Noted	No change



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>site lies to the immediate south of Pilgrims Hatch, and to the west of Brentwood and the A12; * The site does not perform a role in maintaining separation between the already connected settlements of Brentwood and Pilgrims Hatch as evident from the plan and when viewed on the ground; * The site falls within the Central Brentwood Growth Corridor; and, * Its allocation would therefore be consistent with the Settlement Hierarchy and Spatial Strategy for the Borough. Green Belt: * The site is already bounded on two sides by the Urban Area (to the north and east); * The site has clear, physical defensible boundaries to the Green Belt to the south and west, namely Weald Road and Weald Country Park (a Local Authority owned parkland which is also a Registered Park and Conservation Area); * These physical features are readily recognisable, and are permanent in accordance with paragraph 139 of the Framework, and an amended boundary for the Green Belt is appended to these representations; * Any development would therefore be contained and the site has limited intervisibility with the wider Green Belt due to the presence of the urban area, and woodland and tree cover within the site; * Paragraph 138 of the Framework requires first consideration to be given to releasing Green Belt land which has been previously developed or is well served by public transport. The site is well served by public transport as explained below under Accessibility and should therefore be a first consideration; * Paragraph 138 also requires removing land from the Green Belt to be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. The environmental quality and accessibility of Weald Country Park can be improved through the release of this land as explained below under Transport and Connectivity; and * The site's release from the Green Belt would therefore be consistent with National Green Belt Poli...</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24074 - LaSalle Land Limited Partnership [8362]	Object	<p>Identification of 454 housing need is an underestimation, an update using the Feb 2019 planning policy guidance is needed, this would use the standard methodology and 2014 projections. The SHMA should be updated accordingly. This would take the plan period requirements to a least 9214 (with Brentwood policy method). Plan Period should be extended to reflect adoption date.</p> <p><i>LLLP consider that the Plan requires modification to Policy SP02 to: * increase the overall housing requirement in order to meet the current Local Housing Need with a suitable, additional 20% supply buffer; * extend and increase the housing requirement set out to ensure that there is a minimum 15 year lifespan for the Plan at the point of adoption; * remove or significantly modify through the allocation of additional sustainably located sites the proposed stepped housing delivery trajectory from the policy so that there is a significant increase in delivery in the early part of the Plan period; and * redress the imbalance in housing distribution that over-emphasises the DHGV site and fails to align with the Plan's stated sequential land use test.</i></p>	The Council acknowledges that the 2014 Household Projections are required as outlined within the standard methodology. The Regulation 19 consultation had commenced prior to the publication outlining the changes to the standard methodology which originally required the 2016 household projections. The Council included a buffer to the housing target in anticipation of the possible change to the standard methodology.	Amend Chapter 4 paragraphs 4.11 - 4.21 (Managing Housing Growth), to update context of calculating housing need according to the standard method as set out in Planning Practice Guidance.
23162 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>Unclear from the published methodology, as to why, having scored highly in relation to Purpose 1 and 3, DHGV is assessed as making a "moderate to high" contribution to Green Belt purposes, when there are other parcels which make high contributions towards two of the purposes have been assessed as making a "high" contribution towards Green Belt purposes. Basildon Council does not believe that the Plan has reached a justified position in respects of whether the Green Belt evidence has informed the policies. Unclear how the risk of coalescence can be adequately mitigated.</p> <p><i>The Plan should demonstrate in more detail, through a tool such as a Topic Paper, how its site selection choices have been informed by the Green Belt Study 2018 and should any inconsistencies occurs the Plan's land use allocations and justification should be changed.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24310 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Object	<p>A total of 7,752 dwellings be provided in the Borough between 2011-2033 with 310 homes per year to 2022/23 and then 584 per year from 2022/23 taking forward a "stepped delivery" approach to deal with a projected shortfall in the first 5 years of the PSLP. This is mainly because a greater proportion of homes to be delivered in the PSLP comprise sites located in the Green Belt, resulting in longer lead in times to delivery. Whilst we do not raise objections in principle to the stepped approach as far as our clients are concerned there is a prospect that some sites in the Green Belt have the prospect of coming forward earlier, particularly smaller and medium sized developments. This certainly includes this site R24, and R23 that is the subject of a separate representation. The stepped approach proposed, there are still issues with BBC's over-optimistic estimates and assumptions on the delivery of larger strategic sites proposed for allocation in the PSLP. Of the new allocations, 4,578 homes are made up of strategic allocations (of which 2,700 are at DHGV and are to be delivered in the Plan period) and 1,510 are other allocations. The strategic sites therefore represent 68% of the total number of new homes of which some 59% are allocated at DHGV. The ability of larger strategic sites to come forward quickly has been the subject of recent assessments in the Independent Review of Build Out, the Letwin Review (2018); and issues with their complexity, have been ably set out in the Lichfield's study From Start to Finish (2016). Both provide empirical evidence that the early delivery of such sites can be problematical due to a range of factors, including establishing required infrastructure requirements and the timing of housing delivery associated with those requirements, as well as the prolonged or protracted nature of the planning process. The Lichfield's report confirms that the planning process takes, on average, 2.5 years for the planning application determination period for up to 500 units; this can double for sites over 1,000 units. Two of the strategic sites within the PSLP's allocations also comprise developed sites currently in employment uses. The strategic sites are expected to deliver some 1555 homes within 5 years of an assumed adoption in 2020/21. Given the issues set out above it is considered that this is unrealistic and it</p>	Noted.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>would not be justified or the most appropriate strategy to rely on these sites for short term housing delivery. Therefore emphasises the need to review the ability of smaller or medium sized sites such as R23 and R24 to provide for greater flexibility and more homes which have a far greater prospect for short term delivery to ensure the Local Plan is sound.</p> <p><i>Need to review the ability of smaller or medium sized sites such as R23 and R24 to provide for greater flexibility and more homes which have a far greater prospect for short term delivery to ensure the Local Plan is sound.</i></p>		
23631 - Mr Michael Evans [8332]	Object	<p>Object (no reason supplied)</p> <p><i>Remove sites R25 and R26 from plan</i></p>	Noted	No change
24203 - Mrs. Margaret Cartwright [7195]	Object	<p>The only shop is a small Co-op which already can't cope. Not long ago our post office moved to the Co-op giving a very unsatisfactory service. There just isn't enough room to support such a service.</p> <p><i>remove sites R25 and R26 from the Local Plan</i></p>	Noted	No change
23105 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>The housing target for Brentwood as approved in November 2018 is likely to be subject to a recalculation following Government's indication that it will make clear in national Planning Practice Guidance that the 2014-based CLG Household Projections should be used instead of the 2016-based ONS Household Projections; which identified an OAN for Brentwood is 452 homes per annum. This could cause the plan to be less effective and justified.</p> <p><i>1) The Local Plan must be adjusted to incorporate previously discounted development sites, particularly in the Central Brentwood Growth Corridor to restore the flexibility in site supply across a broader range of spatial locations, thereby improving the Plan's effectiveness and deliverability. 2) The methodology to the Local Plan's Housing Trajectory needs to be published and open for comment and challenge of its assumptions.</i></p>	Noted. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough.	Amend Chapter 4 paragraphs 4.11 - 4.21 (Managing Housing Growth), to update context of calculating housing need according to the standard method as set out in Planning Practice Guidance.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24152 - Wiggins Gee Homes Ltd [2788]	Object	<p>Reliance and build rate of Dunton Hills Garden suburb is not realistic. This will squeeze delivery at Dunton Hills into an eight-year period with a resulting annual build rate requirement of nearly 340. The planning permission is likely to be slower than described, there are no documents of support from Basildon Council. The Emerging Basildon Local Plan shows no proposals relating to the Dunton Hills project on its side of the border. Instead it shows the whole area as Metropolitan Green Belt land. All the above indicates that there has been a lack of cross-border cooperation on the Dunton Hills proposed land allocation since 2016. The quantity and timing of new housing delivery from this site, set out in the Pre-Submission Document, are not soundly based. We believe the whole project is now mired in a controversy that involves two of the Borough's local authority neighbours. This must cast doubt on whether the Duty to Cooperate has been fully followed. Therefore at present the whole project is surely in jeopardy.</p> <p><i>The Pre-Submission Document relies very heavily on the Dunton Hills Strategic Allocation. If it were not accepted, or only partially accepted, a review of all the Plan's allocations would be needed and alternatives, like our client's site at Pilgrims Hatch, be reconsidered to make up the deficit.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24184 - Redrow Homes (Jenny Massingham) [7948]	Object	<p>The text at para 8.84 points to Policy SP02 Managing Growth as the policy that introduces the boundary changes. Policy SP02 sets out the number of dwellings for which land will be provided in the plan period and states that new development within the Borough will be directed towards (a) the site allocations in Chapter 9 and (b) highly accessible locations along transit/growth corridors. The policy makes no reference to Green Belt boundary changes. The text leading up to Policy SP02 explains how the Green Belt prevents the Council from identifying a five-year housing land supply, but not why land in the Green Belt is needed in order to deliver the required supply of additional housing.</p> <p><i>Redrow Homes propose: 1- A new policy to follow on from Policy SP02, in Chapter 4 (Managing Growth): Alteration of Green Belt Boundaries The areas of land covered by the following policies are removed from the Green Belt: RO3, (and all others concerned) The Council has arrived at these alterations on the basis of a sequential examination of brownfield and other sites not in the Green Belt, of a review of densities of development and of discussions with neighbouring local authorities to test the scope for them meeting some of the need for housing arising in Brentwood. The exceptional circumstances that justify the alterations are the severe shortage of land not within the Green Belt and suitable for development, making it impossible for the Council to meet its housing need other than through limited alterations of Green Belt boundaries. The Council has selected sites for boundary alterations where there will be least harm to the purposes of the Green Belt. 2- A new line to be added in the sequential test set out in para 3.23 Using Land Sequentially and the table revised to focus on land types: - Brownfield land within urban areas - Greenfield land within urban areas - Brownfield land within the Green Belt - Greenfield land within the Green Belt 3- Policy NE13 (Site Allocations in the Green Belt) is altered as follows: These sites are de-allocated from the Green Belt to allow development to take place...4- Para 8.117 is deleted.</i></p>	Noted	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23955 - CEG Land Promotions Limited [5050]	Object	<p>A modification to Policy SP02(A) and Figure 4.2 is proposed in our response to question no. 6 to acknowledge that housing provision should represent a 'minimum' for consistency with national policy and guidance, and Local Plan Policy R01.</p> <p><i>Policy SP02, Managing Growth (page 50) &amp; Figure 4.2 (page 51): A modification to Policy SP02(A) and Figure 4.2 is proposed to reflect that housing provision reflects a 'minimum'. This also ensures consistency with national policy and guidance, and Local Plan Policy R01. To ensure that the plan is positively prepared and consistent with the NPPF criterion A should be updated to reflect that "provision should be made for a minimum of 7,752 new residential dwellings...". CEG supports the inclusion of Figure 4.2 to explain how housing provision will occur. The column entitled 'Net homes' should either be retitled 'Minimum net homes' and/or a footnote should be included relating to DHGV to the effect that 2,700 is the minimum to be provided, consistent with the wording of Local Plan Policy R01.</i></p>	Noted.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23141 - Ms Wendy Cohen [6923] 23340 - Mrs Danielle Cohen [8313] 23436 - Mr Benjamin Rumary [8324] 23473 - Mr Marc Cohen [4268] 23543 - Mr David Barfoot [7177] 23560 - Ms Eleanora Barfoot [8328] 23569 - Mrs Hayley Hammond [8329] 23573 - Sadie Barfoot [8330] 24198 - Mrs. Margaret Cartwright [7195] 24210 - Mrs. Margaret Cartwright [7195] 24216 - Mrs. Margaret Cartwright [7195] 24222 - Mrs. Margaret Cartwright [7195] 24228 - Mr Callum Cartwright [8370] 24234 - Mr Callum Cartwright [8370] 24240 - Mr Callum Cartwright [8370] 24246 - Mr Callum Cartwright [8370] 24431 - Mr Kevin Joyner [8375] 24437 - Mrs Vicky Mumby [8378] 24457 - Mr Mark Mumby [8379] 24552 - Mrs Angela Taylor [8392] 24578 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874] 24610 - Mr Pete Vince [8123] 24651 - Mrs Karen Wood [8411] 24662 - Mrs Edna Williams [4728] 24766 - Mrs Angela Taylor [8442] 24788 - Mrs Deborah Thwaite [8175] 24828 - Mr Ronald Quested [8452] 24858 - Mrs Beryl Fox [8457] 24930 - Mrs Susie Finlay [5892]	Object	The plan is unsound. The plan is deficient in respect of Blackmore village and unsound on all 4 tests in particular: There is no clear 'strategy ' for the villages including Blackmore, in the north of the borough. The principle of residential development off of Redrose Lane is wrong, Blackmore is an isolated village with modest services and infrastructure (The school is full, the doctors surgery is Doddinghurst is already over subscribed inadequate bus service, narrow lanes and already dangerous parking, sewerage system is overloaded already etc). There are more suitable and or sustainable locations, eg: urban extensions of Brentwood (eg Honeypot Lane), and the locations in Blackmore so not promote sustainable development. BBC has not demonstrated that there are other brownfield sites that are available and which should take priority over the Greenfield/Green Belt land off of Redrose Lane. BBC has failed to demonstrate that the required housing could not be met by increasing housing density on other (allocated) sites. There has been no 'housing needs survey' to demonstrate why Blackmore village is included in the LDP. The local authority has not followed the SCI and fully consulted with local residents and the parishes.	Noted	No change.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24943 - Mr Andrew Finlay [8191] 25012 - Miss Claire Grant [8478] 25500 - Mrs Melanie Simpson [8539] 25531 - Mr. James Simpson [4462] 25585 - Mr Simon Richardson [8562] 25590 - Mr Clive Rosewell [8563] 25603 - Mr David Rolfs [8566] 25609 - Mrs Yvonne Rolfs [8567] 25619 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874] 25820 - Mrs Carol Holmes [4693] 25828 - Miss Jade Hayes [8136] 25849 - Mr John Hughes [4500] 25850 - Mr Thomas Hughes [8637] 25857 - Mrs Gail Hughes [8638] 25864 - Mr Adam Hughes [8639] 25912 - Mr Luke Holmes [8652] 25920 - Miss Ami Holmes [8653] 25927 - Mrs Lucille Foreman [8574] 25933 - Mr Colin Foreman [4394] 25943 - Ms Deborah Cullen [4547] 25951 - Mr Ben Holmes [8654] 25959 - Mr Mark Holmes [8655] 25980 - Mr Colin Holbrook [4759] 25988 - Mrs Janice Holbrook [4700] 26002 - Mrs Shirley Holmes [8660] 26025 - Mr Ken Holmes [8662] 26042 - Mrs Nicola Holmes [8668] 26052 - Malcolm Hurford [7304] 26079 - Mrs Kate Hurford [4275] 26100 - Mr James Hughes [8677] 26175 - Mr Ken Holmes [8691] 26321 - Mrs Sandra Wood [8720] 26373 - Mrs Kim Barber [8731] 26381 - Mr. Colin Barber [919] 26388 - Mr Martin Clark [2456] 26424 - Mrs Rachel Caward [8742]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26440 - Mr Lee Caward [8741]		<i>The plan overall is not the issue- Challenge policies R25 and R26/Blackmore's inclusion in the LDP solely. .Please refer to the Blackmore village survey of July 2018, which has been re-submitted. Blackmore Village Heritage Association will have an updated "Neighbourhood Plan" available. Remove sites R25 and R26 from the plan.</i>		
22352 - Rochford District Council (Planning Policy) [4178]	Support	The Council supports Brentwood Borough Council's commitment to planning to meet its identified housing needs in full, plus the incorporation of a 20% buffer in supply	Support Welcomed	No further action required
23113 - Castle Point Borough Council (Mr Ian Butt) [8304]	Support	The PSLP will be assessed against the requirements of the 2018 National Planning Policy Framework (NPPF). Based on an assessment of some of the key elements of the PSLP, CPBC has no reason to believe that the Plan is inconsistent with national planning policy.	Support Welcomed	No further action required
23175 - Chelmsford City Council (Ms Gemma Nicholson) [8305]	Support	BBC proposes to meet its own housing need within its administrative boundaries and has not approached neighbouring authorities under the Duty to Co-operate to request other authorities help accommodate any unmet needs. This is supported by CCC.	Support Welcomed	No further action required
23911 - Essex Partnership University NHS Foundation Trust [8344]	Support	This policy seeks to direct development to the site allocations set out in the Local Plan and within the highly accessible locations along transit/growth corridors. Land off Warley Hill would accord with both of these principles, so we support this policy.	Support Welcomed	No further action required
23112 - Castle Point Borough Council (Mr Ian Butt) [8304]	Support	The PSLP provides for an uplift in the amount of homes that will be delivered over the Plan period. It identifies that the majority of homes will be delivered after the first five years of the plan period. Where the majority of allocations within the Plan are on Green Belt sites, these sites will require longer lead in times before new dwellings can be delivered. The PSLP has set out a phased rate of housing delivery which they consider realistic and deliverable. CPBC has no reason to believe that this approach is not justified and effective	Support Welcomed	No further action required

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23111 - Castle Point Borough Council (Mr Ian Butt) [8304]	Support	It is acknowledged that BBC has undertaken extensive work to identify suitable sites, review the urban land capacity, seek additional land capacity through windfall, town centre and brownfield sites, review urban densities, seek to limit the loss of the Green Belt, and consider the practical realities of phasing development alongside infrastructure delivery. CPBC commends the approach taken by BBC in seeking to deliver high housing requirements in an area with significant environmental, Green Belt and infrastructure challenges. In relation to Policy SP02, CPBP has no reason to believe that the PSLP has not been prepared positively.	Support Welcomed	No further action required
23904 - Crest Nicholson Eastern [2509]	Support	This policy seeks to direct development to the site allocations set out in the Local Plan and within the highly accessible locations along transit/growth corridors. Land at Nags Head Lane would accord with both of these principles, so we support this policy.	Support Welcomed	No further action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24115 - Mr Terry Haynes [8359]	Support	<p>Although on the whole it is generally considered that the Council's Pre-Submission Local Plan is sound there is some concern that the Council's Housing Requirement is not fully robust. The PPG on 'Housing and economic needs assessment', which was updated on the 20th February 2019, confirms that 2014 based household projections should be used as the baseline for the 'standard method'. The housing requirement has been calculated within the SHMA (2018) with this assessment confirming that the housing requirement has been calculated using the 2016 population projections as a starting point. The Standard Method using the 2014 population projections was published (2017) - this stated that Brentwood's housing need, based on the Standard Method, was 454 dwellings per annum. Applying the 20% uplift to this figure would result in a housing requirement of 545 homes per year, or a total of 9,262 homes during the plan period 2016-2033. Accordingly, we consider that the Inspector should, during the Examination, request that Brentwood update its evidence base, and its housing requirement, to reflect the 2014-based population projections.</p> <p><i>Brentwood Borough Council will need to revisit its evidence base to determine a housing requirement which uses the 2014 population projections as a starting point. This will result in a larger housing requirement, with our estimate based on the indicative Standard Method being approximately 545 homes per year, or a total of 9,262 homes during the plan period 2016-2033. (24115)</i></p>	Support Welcomed	Amend Chapter 4 paragraphs 4.11 - 4.21 (Managing Housing Growth), to update context of calculating housing need according to the standard method as set out in Planning Practice Guidance.
23174 - Chelmsford City Council (Ms Gemma Nicholson) [8305]	Support	Chelmsford Council welcomes Brentwood Borough Council's commitment to significantly boost the supply of housing to meet the needs of the area and the decision to adopt a higher figure of 456dpa in anticipation of MHCLG intention to adjust the standardised methodology to safeguard against any potential uplift.	Support Welcomed	No further action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Sequential Land Use</i>				
23660 - EA Strategic Land LLP [279]	Object	<p>The spatial strategy seeks to accommodate growth in locations which are sustainable and will maximise the value of railway connectivity. However, the sequential approach proposes that after urban and brownfield sites, growth should be focused on strategic sites (removed from existing services and infrastructure) followed by urban extensions (areas close to existing transport infrastructure). This approach conflicts with the spatial strategy and wider policies which all seek first and foremost to develop land next to existing infrastructure and services, provided there are no detrimental impacts on important environmental designations. In this respect the Local Plan policies conflict with one another.</p> <p><i>Site West of Thorndon Avenue, West Horndon is fully in accordance with the spatial strategy focused on transit orientated growth and should be allocated. No significant constraints with developing an urban extension at West Horndon, in addition to Dunton Hills Garden Village was identified by the Sustainability Appraisal. If Brentwood is to attempt to meet the housing needs, this approach is required.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24174 - Redrow Homes (Jenny Massingham) [7948]	Object	<p>The NPPF 2018 has two main stipulations relating to alterations of Green Belt boundaries: "136. (part) Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries..." "137 (part) Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.." The second requirement (examined fully all other reasonable options) should be conducted before the first. The Council's overall approach to site selection is described and the approach is summarised in Figure 7 of that document and in para 3.23 of the Draft Plan. This sequential approach includes brownfield sites in the Green Belt but not greenfield sites in the Green Belt. Furthermore para 3.23 confuses a number of site selection criteria, for example proximity to transport facilities, as well as the key quality of the sites. At several points in the Draft Plan the Council has described how it went through this examination, most notably at paras 4.22-4.23 and the associated Figure 4.2, which shows that some 20% of the total new housing proposed will be located on Green Belt land. It would be helpful if this Figure could be explicitly labelled as illustrating the sequential examination.</p> <p><i>Redrow Homes propose: 1- A new policy to follow on from Policy SP02, in Chapter 4 (Managing Growth): Alteration of Green Belt Boundaries The areas of land covered by the following policies are removed from the Green Belt: RO3, (and all others concerned) The Council has arrived at these alterations on the basis of a sequential examination of brownfield and other sites not in the Green Belt, of a review of densities of development and of discussions with neighbouring local authorities to test the scope for them meeting some of the need for housing arising in Brentwood. The exceptional circumstances that justify the alterations are the severe shortage of land not within the Green Belt and suitable for development, making it impossible for the Council to meet its housing need</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>other than through limited alterations of Green Belt boundaries. The Council has selected sites for boundary alterations where there will be least harm to the purposes of the Green Belt. 2- A new line to be added in the sequential test set out in para 3.23 Using Land Sequentially and the table revised to focus on land types: - Brownfield land within urban areas - Greenfield land within urban areas - Brownfield land within the Green Belt - Greenfield land within the Green Belt3- Policy NE13 (Site Allocations in the Green Belt) is altered as follows: These sites are de-allocated from the Green Belt to allow development to take place... 4- Para 8.117 is deleted.</p>		
23636 - Tesco [5252]	Object	<p>Object. Duty to cooperate doesn't consider unmet needs. Reasonable alternatives are not suitably assessed and the preferred strategy is not suitably justified.</p> <p><i>* Use 2014-based household projections as basis for the Local Plan. This means local housing needs baseline is 454 dwellings per annum. * Set a housing requirement in Policy SP02 of 9,265 dwellings (which takes account of a 20% buffer). * Re-balance the stepped trajectory approach to bring forward more housing in the first five years. This will also help address the five year housing land supply issue. * Undertake additional work in respect of Duty to Co-operate, Sustainability Appraisal and Habitats Regulation Assessment. This is required to comply with the NPPF (2019) and legal tests. * Undertake updated Green Belt assessment. * Identify the Hopefield Site as a Housing Allocation in the new Local Plan as part of the revised and sound development strategy. This is required to address the above matters especially in relation to delivering the growth strategy and meeting five year housing land supply.</i></p>	<p>The Council acknowledges that the 2014 Household Projections are required as outlined within the standard methodology. The Regulation 19 consultation had commenced prior to the publication outlining the changes to the standard methodology which originally required the 2016 household projections. The Council included a buffer to the housing target in anticipation of the possible change to the standard methodology.</p>	<p>Amend Chapter 4 paragraphs 4.11 - 4.21 (Managing Housing Growth), to update context of calculating housing need according to the standard method as set out in Planning Practice Guidance.</p>

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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4.22



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24176 - Redrow Homes (Jenny Massingham) [7948]	Object	<p>The NPPF 2018 has two main stipulations relating to alterations of Green Belt boundaries: "136. (part) Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries..." "137 (part) Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.." At several points in the Draft Plan the Council has described how it went through this examination, most notably at paras 4.22-4.23 and the associated Figure 4.2, which shows that some 20% of the total new housing proposed will be located on Green Belt land. It would be helpful if this Figure could be explicitly labelled as illustrating the sequential examination.</p> <p><i>Redrow Homes propose: 1- A new policy to follow on from Policy SP02, in Chapter 4 (Managing Growth): Alteration of Green Belt Boundaries The areas of land covered by the following policies are removed from the Green Belt: RO3, (and all others concerned) The Council has arrived at these alterations on the basis of a sequential examination of brownfield and other sites not in the Green Belt, of a review of densities of development and of discussions with neighbouring local authorities to test the scope for them meeting some of the need for housing arising in Brentwood. The exceptional circumstances that justify the alterations are the severe shortage of land not within the Green Belt and suitable for development, making it impossible for the Council to meet its housing need other than through limited alterations of Green Belt boundaries. The Council has selected sites for boundary alterations where there will be least harm to the purposes of the Green Belt. 2- A new line to be added in the sequential test set out in para 3.23 Using Land Sequentially and the table revised to focus on land types: - Brownfield land within urban areas - Greenfield land within urban areas - Brownfield land within the Green Belt - Greenfield land within the Green Belt 3- Policy NE13 (Site Allocations in the Green Belt) is altered as follows: These sites are de-</i></p>	Noted	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
<i>allocated from the Green Belt to allow development to take place... 4- Para 8.117 is deleted.</i>				
24271 - Strutt & Parker LLP (Mr. Andy Butcher) [2741] 24314 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Object	PSLP suggested that a sequential approach is to be taken to the determination of planning applications, referring only to prioritising brownfield land in urban areas and brownfield land in the Green Belt. The reasons for this are unclear when the PSLP strategy includes releasing land from the Green Belt to meet development needs which includes the sites the subject of these representations. The growth requirements set out by Policy SP02, and the sequential approach to meeting those requirements are referred to at paragraph 3.23, provide for the justification for the chosen spatial strategy. As a consequence, it is not justified to suggest that a sequential test be taken for the determination of planning applications and paras 4.22 and 4.23 should be deleted from the PSLP.	Noted	No change
<i>Paras 4.22 and 4.23 should be deleted from the PSLP.</i>				

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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4.23

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24175 - Redrow Homes (Jenny Massingham) [7948]	Object	<p>The NPPF 2018 has two main stipulations relating to alterations of Green Belt boundaries: "136. (part) Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries..." "137 (part) Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.." At several points in the Draft Plan the Council has described how it went through this examination, most notably at paras 4.22-4.23 and the associated Figure 4.2, which shows that some 20% of the total new housing proposed will be located on Green Belt land. It would be helpful if this Figure could be explicitly labelled as illustrating the sequential examination.</p> <p><i>Redrow Homes propose: 1- A new policy to follow on from Policy SP02, in Chapter 4 (Managing Growth): Alteration of Green Belt Boundaries The areas of land covered by the following policies are removed from the Green Belt: RO3, (and all others concerned) The Council has arrived at these alterations on the basis of a sequential examination of brownfield and other sites not in the Green Belt, of a review of densities of development and of discussions with neighbouring local authorities to test the scope for them meeting some of the need for housing arising in Brentwood. The exceptional circumstances that justify the alterations are the severe shortage of land not within the Green Belt and suitable for development, making it impossible for the Council to meet its housing need other than through limited alterations of Green Belt boundaries. The Council has selected sites for boundary alterations where there will be least harm to the purposes of the Green Belt. 2- A new line to be added in the sequential test set out in para 3.23 Using Land Sequentially and the table revised to focus on land types: - Brownfield land within urban areas - Greenfield land within urban areas - Brownfield land within the Green Belt - Greenfield land within the Green Belt 3- Policy NE13 (Site Allocations in the Green Belt) is altered as follows: These sites are de-</i></p>	Noted	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
		<i>allocated from the Green Belt to allow development to take place... 4.- Para 8.117 is deleted.</i>		
24270 - Strutt & Parker LLP (Mr. Andy Butcher) [2741] 24313 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Object	PSLP suggested that a sequential approach is to be taken to the determination of planning applications, referring only to prioritising brownfield land in urban areas and brownfield land in the Green Belt. The reasons for this are unclear when the PSLP strategy includes releasing land from the Green Belt to meet development needs which includes the sites the subject of these representations. The growth requirements set out by Policy SP02, and the sequential approach to meeting those requirements are referred to at paragraph 3.23, provide for the justification for the chosen spatial strategy. As a consequence, it is not justified to suggest that a sequential test be taken for the determination of planning applications and paras 4.22 and 4.23 should be deleted from the PSLP.	Noted	No change
		<i>Paras 4.22 and 4.23 should be deleted from the PSLP.</i>		

Figure 4.2: Demonstrating Housing Provision

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Figure 4.2: Demonstrating Housing Provision</i>				
24162 - Mr Mr J Nicholls and Mr A Biglin (Land owners) [8368]	Object	<p>In the Regulation 18 document, three strategic sites were proposed; this has now increased to five. We object to the strategy relying on several large developments to deliver such a large proportion of growth for the Borough, particularly within the first five years from adoption. As set out in Appendix 1, this strategy results in the delivery of no new housing in the early years of the Plan.</p> <p><i>The Plan should be reviewed and sites identified to meet the higher housing number of 547 dwellings per annum, through the addition of smaller site allocations. Smaller sites are more deliverable over the early years of the Plan period since they typically require less investment in infrastructure, are within single ownership and have fewer complex issues to address at planning application stage. This is in contrast to larger strategic sites which are often reliant on significant infrastructure improvements, comprise multiple ownerships, require complex legal agreements and typically take much longer to deliver. Allocating additional smaller sites will have multiple benefits; it will increase the flexibility of the Plan, it will contribute to the five year housing land supply, it will enable sites which do not require significant infrastructure provision to come forward quickly, and it will attract smaller house building companies who will not be present upon larger strategic sites. Paragraph 3.21c of the Plan states that: 'Brownfield opportunities will be encouraged where appropriate schemes help meet local needs and ensure that our villages remain thriving communities, in line with policies in the Plan. Where appropriate, this includes the redevelopment of previously developed sites in the Green Belt.' This source of sites should be reviewed to provide smaller sites which increase the deliverability and flexibility of the Plan.</i></p>	Noted.	No change

Figure 4.2: Demonstrating Housing Provision

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23383 - BJ Associates [8317] 24154 - Wiggins Gee Homes Ltd [2788]	Object	<p>Reliance and build rate of Dunton Hills Garden suburb is not realistic. This will squeeze delivery at Dunton Hills into an eight-year period with a resulting annual build rate requirement of nearly 340. The planning permission is likely to be slower than described, there are no documents of support from Basildon Council. The Emerging Basildon Local Plan shows no proposals relating to the Dunton Hills project on its side of the border. Instead it shows the whole area as Metropolitan Green Belt land. All the above indicates that there has been a lack of cross-border cooperation on the Dunton Hills proposed land allocation since 2016. The quantity and timing of new housing delivery from this site, set out in the Pre-Submission Document, are not soundly based. We believe the whole project is now mired in a controversy that involves two of the Borough's local authority neighbours. This must cast doubt on whether the Duty to Cooperate has been fully followed. Therefore at present the whole project is surely in jeopardy.</p> <p><i>The Pre-Submission Document relies very heavily on the Dunton Hills Strategic Allocation. If it were not accepted, or only partially accepted, a review of all the Plan's allocations would be needed and alternatives, like our client's site at Pilgrims Hatch, be reconsidered to make up the deficit.</i></p>	Noted	No change

Figure 4.2: Demonstrating Housing Provision

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24177 - Redrow Homes (Jenny Massingham) [7948]	Object	<p>The NPPF 2018 has two main stipulations relating to alterations of Green Belt boundaries: "136. (part) Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries..." "137 (part) Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.." At several points in the Draft Plan the Council has described how it went through this examination, most notably at paras 4.22-4.23 and the associated Figure 4.2, which shows that some 20% of the total new housing proposed will be located on Green Belt land. It would be helpful if this Figure could be explicitly labelled as illustrating the sequential examination.</p> <p><i>Changes to Plan:</i>  <i>Redrow Homes propose: 1- A new policy to follow on from Policy SP02, in Chapter 4 (Managing Growth): Alteration of Green Belt Boundaries The areas of land covered by the following policies are removed from the Green Belt: RO3, (and all others concerned) The Council has arrived at these alterations on the basis of a sequential examination of brownfield and other sites not in the Green Belt, of a review of densities of development and of discussions with neighbouring local authorities to test the scope for them meeting some of the need for housing arising in Brentwood. The exceptional circumstances that justify the alterations are the severe shortage of land not within the Green Belt and suitable for development, making it impossible for the Council to meet its housing need other than through limited alterations of Green Belt boundaries. The Council has selected sites for boundary alterations where there will be least harm to the purposes of the Green Belt. 2- A new line to be added in the sequential test set out in para 3.23 Using Land Sequentially and the table revised to focus on land types: - Brownfield land within urban areas - Greenfield land within urban areas - Brownfield land within the Green Belt - Greenfield land within the Green Belt 3- Policy NE13 (Site Allocations in the</i></p>	Noted	No change



Figure 4.2: Demonstrating Housing Provision

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>Green Belt) is altered as follows: These sites are de-allocated from the Green Belt to allow development to take place... 4- Para 8.117 is deleted.</i>		
23956 - CEG Land Promotions Limited [5050]	Object	<p>Policy SP02, Managing Growth (page 50) &amp; Figure 4.2 (page 51). A modification to Policy SP02(A) and Figure 4.2 is proposed in our response to question no. 6 to acknowledge that housing provision should represent a 'minimum' for consistency with national policy and guidance, and Local Plan Policy R01.</p> <p><i>Policy SP02, Managing Growth (page 50) &amp; Figure 4.2 (page 51). A modification to Policy SP02(A) and Figure 4.2 is proposed to reflect that housing provision reflects a 'minimum'. This also ensures consistency with national policy and guidance, and Local Plan Policy R01. To ensure that the plan is positively prepared and consistent with the NPPF criterion A should be updated to reflect that "provision should be made for a minimum of 7,752 new residential dwellings...". CEG supports the inclusion of Figure 4.2 to explain how housing provision will occur. The column entitled 'Net homes' should either be retitled 'Minimum net homes' and/or a footnote should be included relating to DHGV to the effect that 2,700 is the minimum to be provided, consistent with the wording of Local Plan Policy R01.</i></p>	Noted	No change
<b><i>POLICY SP03: HEALTH IMPACT ASSESSMENTS (HIAs)</i></b>				
23777 - Strutt & Parker LLP (Jen Carroll) [6751] 23895 - Redrow Homes [6669] 24018 - Croudace Strategic Ltd [2656] 24091 - Countryside Properties [250]	Object	<p>We are in agreement with the HBF's response, dated 17th March 2019, in relation to the requirement for HIAs to be provided for 50 or more dwellings and consider the requirement to be unnecessary and an additional burden on applicants. Referring to the PPG we note that HIAs may be useful tools, however the PPG also expresses the importance of the local plan needing to consider the wider health issues in an area and ensuring the policies respond to these concerns.</p> <p><i>The requirement for a HIA should only be triggered where there is a departure from the plan, enabling the Council to assess any impacts on the health and wellbeing of the community as a result of said proposals.</i></p>	Noted. Policy was developed in line with the Essex Planning Officers Association (EPOA) HIA Guidance which has been agreed by all Essex Planning Authorities.	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26362 - Mr. Christopher Burrow [4618]	Object	BBC should be consulting with other local authorities to increase development on already allocated brownfield sites, where a far better infrastructure is already in place, including roads and public services  <i>Sites R25 and R26 should be removed from the LDP. The BVHA Neighbourhood Plan should be referred to, which sets out local needs for housing.</i>	Noted.	None
22602 - Cllr Philip Mynott [8283]	Object	The selection of the chosen Local Plan sites fails to adhere to the Plan's SP03 (Health Impact Assessments).  <i>The chosen sites need to be changed for others.</i>	Noted.	None
25981 - Mr Colin Holbrook [4759] 25989 - Mrs Janice Holbrook [4700]	Object	If SP03 is actually imposed, the Blackmore developments will fail the requirements on over half and will in fact have a negative Health Impact on the existing residents. This means the Council would be obliged to refuse the planning permission or levy a huge CIL on the developer which would make it non-viable due to total loss of profitability.  <i>Question 5 - bullets 1-3 * Due to the significant issues surrounding the acceptance of Reg 18 by BBC I think it would be necessary to independently reconsider the entire process to ensure that it was handled appropriately, and if not, repeat the process correctly before proceeding to Reg 19. Other bullets * New officials who understand the local issues and can make their voices heard with independence, in an environment that is willing to listen would be a prerequisite to getting any issues of this magnitude considered in a fair and democratic fashion. * Removing Blackmore from the List of Sites as previously promised or allocating the 70 houses to Dunton Hills, as already done for other sites.</i>	Noted.	No changes made.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23896 - Redrow Homes [6669]	Object	<p>Criterion C places the burden of delivery of health and social care facilities on the developer who is unlikely to be a health and social care provider and therefore cannot reasonably be expected to deliver such facilities or to address existing deficiencies. It may be that such facilities are entirely absent in any area where development is allocated despite an existing need. In such case, the wording of the policy means that a developer could be required to provide more than is necessary to mitigate the impacts arising from the development. This conflicts with national policy and could prejudice deliverability.</p> <p><i>* Amend criterion C to raise the threshold to 500 *</i>  <i>Remove the requirement for the developer to deliver the necessary health and social care facilities *</i>  <i>Ensure that it is clear that the developer is only expected to contribute to improvements necessary to mitigate the impact of the development where such facilities are already in place.</i></p>	Noted. Policy is in line with the Essex Planning Officers Association (EPOA) HIA Guidance which all Essex Planning Authorities have agreed to.	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24671 - Mr Eric John Webb [1830]	Object	<p>Proposals for Blackmore are not justified. The plan proposal significantly changed from previous versions of the document, the discussion on the plan at the full council meeting was prevented, the regularisation of the travellers site was without warning, duty to cooperate with other boroughs and consideration of their development has not taken place, the consultation form is complex and unclear and unsuitable, other developments in the north of the borough are not considered, a 30% rise in housing here is unsustainable and does not have the infrastructure to support it, impacts on roads, wildlife, habitat is too great.</p> <p><i>* A clear need for the proposals to be reconsidered as part of a new 'strategy' for the Villages (Including Blackmore) in the North of the borough/North of Brentwood town. * Proper and appropriate consultation with Epping Forests District Council to ensure that these developments on the boundaries or the two boroughs are appropriately addressed with capable, sustainable integrated plans. [30+ houses in Fingrith Hall lane+ 4 pairs of semi's on former Nine Ashes Farm affect Blackmore I And more are being developed In King Street on the pub site] * Proper consideration to alternative sites in the Village- Brown field Red Rose Farm, or the area -Stondon or re-Inclusion of Honey Pot Lane. These are either more suitable or more sustainable or both.* Housing needs In the area do not require this density development-assign more to other areas .* Perform a proper and appropriate Housing Need Survey and rely on the outcome of that. * Do not propose access to/egress from sites (such as R25 and R26 on roads entirely unsuitable for it. .* Do not propose developments In a place (Blackmore R25 and R26) where there is already a severe flooding problem which h the development will worsen and no mitigation proposal in the plans. * Respect results of prior planning enquiries which found that Traveller pitches Plot 3 oak Tree Farm were not appropriate. Likewise no not recognise Plots 1 and 2 which were previously not approved for entirely appropriate reasons.</i></p>	Noted.	None.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26101 - Mr James Hughes [8677]	Object	<p>The plan makes no provisions for the development of local amenities and infrastructure - local school and doctor's surgery are already at capacity. The internet connection is appalling, the sewage system is at tipping point, there are frequent power-cuts in the area already, Public Transport is almost non-existent in the village and parking anywhere is a nightmare.</p> <p><i>Due to issues I have made clear I believe it is the Council's duty to remove sites R25 and R26 from the LDP such that they do not overwhelm local amenities and services; such that they do not cause further flooding by removing crucial green spaces and such that they are not driving forward with plans that would adversely affect live in the surrounding areas. Blackmore if not an affordable area for young people trying to get on the 'property-ladder': so any attempt to provide affordable housing within that area is counter-intuitive.</i></p>	Noted.	None
23243 - Mid and South Essex STP (Kerry Harding) [3791]	Support	We would suggest that the design of homes and housing can also have a positive impact on the physical, social, and mental health and well-being of communities and this should be reflected in Policy SP03.	Support Action	No further action required
22296 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Support	We welcome the policy recognition of the value of open and green space, with the caveat that this policy statement should be amended to include contact with nature, as follows: e. open and green space, "including contact with nature and wildlife". It is now widely recognised that contact with nature and wildlife significantly improves health and wellbeing, for example by helping to lower levels of heart disease, obesity, stress and depression	Support Welcomed	No further action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22370 - Sport England (Mr. Roy Warren) [4294]	Support	This policy is supported as it requires major developments to promote healthy (and therefore active) environments through the preparation of Health Impact Assessments. The reference to the use of the EPOA advice to inform such assessments is particularly welcomed as the most recent review of the advice has fully incorporated consideration of how a development considers the opportunities for creating environments that encourage physically activity including consideration of Sport England's Active Design guidance	Support Welcomed	No further action required

#### *POLICY SP04: DEVELOPER CONTRIBUTIONS*

23678 - Gladman Developments [2774]	Object	<p>Whilst Gladman has no specific comments on the content of Policy SP04, we would wish to voice concern over the myriad of policies contained in the Local Plan which may have implications for development viability. Many of the policies such as Policy SP05, BE01, BE02, BE03, BE09, BE10 etc have requirements within them that will impact on the viability of development schemes. It is unclear from the evidence provided whether the cumulative impact of all of these requirements has been considered through the Viability Study, which is a requirement set out at Paragraph 34 of the Framework to ensure that such policies do not undermine the deliverability of the Plan. This gap in evidence needs to be addressed by the Council to ensure that these policies are justified.</p> <p><i>Consider cumulative impact of Policy SP05, BE01, BE02, BE03, BE09, BE10 etc on Policy SP04: Developer Contributions</i></p>	Noted	No change
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23897 - Redrow Homes [6669]	Object	<p>Criterion A expects developers to guarantee the sustained provision of infrastructure. The responsibility for sustained provision rests with the infrastructure provider and this should not be transferred to the developer. Criterion F requires a Financial Viability Assessment where there is conflict with planning policy requirements. It does not specify which policy conflicts would trigger this need, so as currently written would apply to any such conflict. This presents an unreasonable and unnecessary burden for a developer where the conflict arises of feasibility rather than viability issues. There may also be sound material considerations for departing from a particular policy.</p> <p><i>Remove the last sentence of criterion A and amend criterion F to confirm what policy conflicts trigger the need for a viability assessment.</i></p>	Noted	No change
24019 - Croudace Strategic Ltd [2656]	Object	<p>Policy SP04 should be more explicit on the exact nature of requirements that the developer may be required to meet to avoid overly onerous requirements or confusion over cumulative impact and phasing with other developments and therefore this policy is not "justified" and is unsound.</p>	Noted	No change
24438 - Mrs Vicky Mumby [8378]	Object	<p>SP04 A - this policy is not being applied to sites R25 and R26 to ensure infrastructure and therefore the policy is unsound.</p> <p><i>Remove sites R25 and R26 from plan, refer to the Blackmore Village Heritage Association (BVHA) 'Neighbourhood Plan' for housing need.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23167 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>The Plan fails to investigate the possible impacts on Basildon's road and rail infrastructure, as a neighbouring authority, arising from commuters or other road users choosing to access facilities within the Basildon Borough instead. The need for new connections into Basildon was not mentioned as being necessary to make it sustainable. Policy SP04 does not explicitly mention that it has accounted for the spatial context of DHGV. It does not state that it will support the possibility of developer contributions being used to mitigate this impact outside Brentwood in higher-order settlements which are closer to but outside Brentwood's own settlements.</p> <p><i>The Plan should be modified to recognise that some impacts are likely to be cross boundary and additional provisions should be incorporated into SP04 and RO1(l) that will support using S106/CIL arising from development in Brentwood Borough to be used for investment outside the Brentwood Borough, where it can be proven that there is reasonable likelihood of a direct or residual impacts otherwise being caused that need to be mitigated. This will make the Plan more effective, justified and in accordance with national policy.</i></p>	Noted	No change
24277 - Strutt & Parker LLP (Mr. Andy Butcher) [2741] 24316 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Object	<p>There are no objections to the general approach expressed in Policy SP04 for developer contributions. However, section E is neither precise, necessary or justified and could be open to misinterpretation. It is therefore recommended that this be omitted.</p> <p><i>Section E is neither precise, necessary or justified and could be open to misinterpretation. It is therefore recommended that this be omitted.</i></p>	Noted.	No change



## POLICY SP04: DEVELOPER CONTRIBUTIONS

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22283 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Attention is drawn to ECC Full Council Motion in October 2014, reaffirmed in July 2017 - Essex County Council will not support Local Plans unless adequate resources are identified from developers, local councils and/or Government grants to ensure sufficient infrastructure is provided in timely manner and in way that balances needs to promote economic growth and provide housing for residents whilst protecting quality of life. Policy should be amended to clarify and strengthen intent to effectively secure and deliver necessary infrastructure and contributions so ECC's role as infrastructure provider is not jeopardised. In line with NPPF paragraphs 20 &amp; 34.</p> <p><i>Amend Policy SP04 B. b. as follows -</i></p> <p><i>b. on-site construction of new provision;</i>  <i>c. off-site capacity improvement works;</i></p> <p><i>Amend Policy SP04 F. as follows -</i></p> <p><i>F. Exceptions to this Policy will only be considered whereby:</i>  <i>a.it is proven that the benefits of the development proceeding without full mitigation outweigh the collective harm;</i>  <i>b. a fully transparent open book Viability Assessment has proven that the full mitigation cannot be afforded, allowing only the minimum level of developer profit and land owner receipt necessary for the development to proceed. The viability assessment may be subject to an independent scrutiny by appointed experts;</i>  <i>c. a full and thorough investigation has been undertaken to find innovative solutions to issues and all possible steps have been taken to minimise the residual level of unmitigated impacts; and ...'</i></p>	Noted.	<p>Consider making the following changes: Policy SP04 B. b. -b. on-site construction of new provision; c. off-site capacity improvement works; Policy SP04 F. as follows - F. Exceptions to this Policy will only be considered whereby: a.it is proven that the benefits of the development proceeding without full mitigation outweigh the collective harm; b. a fully transparent open book Viability Assessment has proven that the full mitigation cannot be afforded, allowing only the minimum level of developer profit and land owner receipt necessary for the development to proceed. The viability assessment may be subject to an independent scrutiny by appointed experts; c. a full and thorough investigation has been undertaken to find innovative solutions to issues and all possible steps have been taken to minimise the residual level of unmitigated impacts; and ...'</p>
22332 - Anglian Water (Mr Stewart Patience) [6824]	Support	<p>Anglian Water supports the requirement for infrastructure capacity to be currently or made available to serve new development</p>	Support Welcomed	No further action required

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23212 - Thames Water (On behalf of Thames Water) [1927]	Support	<p>Support the policy in principle. However, it is not possible for any necessary upgrades to be secured through CIL or S106 contributions. In order to ensure that any necessary sewerage infrastructure reinforcement works required to support a development are delivered ahead of the occupation of development it may be necessary for planning conditions to be used to ensure that a development or phase of development is not occupied until the required upgrade has been delivered. To help ensure this Policy SP04 should make reference to the use of planning conditions as a mechanism alongside S106 and CIL.</p> <p><i>To address the above concern Part B of Policy SP04 could be amended to incorporate the following wording: "c. off-site capacity improvement works (secured through appropriate planning conditions or agreements)". The proposed change would ensure that planning conditions can be used to secure infrastructure improvements necessary to support development alongside S106 agreements and CIL thereby ensuring that the policy is effective and the Local Plan is sound.</i></p>	Support Welcomed	No further action required
22601 - Essex Police and Fire Service [8278]	Support	<p>The additional population generated by development within Brentwood's Borough will place an increased demand on the level of policing and fire and rescue services for the area. This representation is therefore concerned with ensuring that policies in the Local Plan are sound in respect of infrastructure planning and mechanisms to secure new infrastructure or contributions towards both services. This submission is a holding response, which the PFCC office wishes to expand upon further during dialogue with Brentwood Borough Council in the remaining stages of its Local Plan preparation.</p>	Support Welcomed	No further action required

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23240 - Mid and South Essex STP (Kerry Harding) [3791]	Support	Policies should be explicit in that contributions towards healthcare provision will be obtained and the Local Planning Authority will consider a development's sustainability with regard to effective healthcare provision. The exact nature and scale of the contribution and the subsequent expenditure by the STP will be calculated at an appropriate time as and if schemes come forward over the plan period to realise the objectives of the LP.	Support Welcomed	No further action required
<hr/>				
<i><b>4.31</b></i>				
22522 - Dr Philip Gibbs [4309]	Object	The distribution of secondary schools is wrong, with too many in Brentwood Town. This causes too much unnecessary traffic.  <i>close Brentwood county and use site for housing development. use the money to build a school in West Basildon instead</i>	Noted	No change
<hr/>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>4.33</b>				
22287 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>ECC position = supporting Local Plans but ensuring do not place unnecessary burden on ECC and public purse. IDP in current form has significant infrastructure cost implications and unanswered questions for ECC (primary infrastructure provider). Places much greater risk on public purse (mitigation costs, delivery implications, viability unclear). IDP cannot be supported in current form. Plan must be supported by completed IDP (costs, phasing, delivery and viability), needs to be agreed with ECC. BBC needs to engage with ECC. Significant work still required. ECC will continue to be engaged to ensure appropriate IDP in place ahead of submission and examination.</p> <p><i>The Plan must be supported by a completed IDP that reflects the evidence base, discussions with ECC for those areas where we have responsibility, and include infrastructure costs, phasing, delivery and viability. BBC needs to engage with ECC as a major infrastructure provider to prepare its final IDP to support its Plan. Significant work, particularly in respect of costings, phasing, deliverability and viability is still required. ECC will continue to be engaged in this process with BBC to ensure that an appropriate IDP is in place ahead of submission and examination.</i></p>	The IDP is a live document which has been continuously updated throughout the Local Plan process. The Council will continue to engage with Essex County Council throughout this process.	No change.
<b>4.34</b>				
23244 - Mid and South Essex STP (Kerry Harding) [3791]	Support	In order to ensure that the Infrastructure Deliver Plan remains current we would suggest a review of health infrastructure requirements on an annual basis.	Support Welcomed	No further action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY SP05: CONSTRUCTION MANAGEMENT</i></b>				
23779 - Strutt & Parker LLP (Jen Carroll) [6751] 24092 - Countryside Properties [250]	Object	<p>The Policy expects all major development schemes/developers to sign up to the Considerate Constructors Scheme, or equivalent. The scheme is a non-profit making, independent organisation which monitors construction sites signed up to the scheme, with the aim of managing and mitigating impacts arising from construction. This requirement is considered unjustified and inconsistent with national policy. We are not aware of any other adopted or emerging Local Plan which requires applicants and developers of major sites to enter into a specified construction management scheme and therefore question the reasonableness of this policy.</p> <p><i>The imposition of Policy SP05 requires all major developments to be signed up to the Considerate Constructors Scheme regardless of the site or proposal details. It is recommended that this policy is removed.</i></p>	Noted	No change
23957 - CEG Land Promotions Limited [5050]	Support	<p>Policy SP05 requires developers to take a considered approach to construction management and seeks to manage construction activity to minimise local disturbance. CEG supports this policy and will bring forward the development at DHGV in this way. Criterion B might usefully clarify that this refers to other major 'committed' development.</p> <p><i>Policy SP05, Construction Management (page 58). Criterion B might usefully clarify that this refers to "... other major 'committed' development..."</i></p>	Support Welcomed	No further action required
24020 - Croudace Strategic Ltd [2656]	Support	<p>It is considered that this policy accords with the NPPF and is therefore found to be sound, with particular reference to NPPF (para 72) which refers to larger scale development supported by the necessary infrastructure and facilities.</p>	Support Welcomed	No further action required

POLICY SP06: EFFECTIVE DELIVERY OF DEVELOPMENT

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>POLICY SP06: EFFECTIVE DELIVERY OF DEVELOPMENT</i>				
24128 - Ford Motor Company (Mr Clive Page) [3769]	Object	<p>Our Client notes that Draft Policy SP06 is designed to ensure that a collaborative and participatory approach is taken when working up proposals. Ford are broadly supportive of this policy position, understanding the importance of comprehensive masterplanning to inform strategic site delivery. However, our Client wishes to note that such exercises should not inhibit the ability of individually owned sites to come forward for development. This is specifically referenced with regards to the Council Depot currently being included under the wider allocation for the Ford site, which we understand is not anticipated to be available for redevelopment until later in the plan period.</p> <p><i>Whilst Ford welcomes open and collaborative discussions regarding the wider allocation, and indeed the masterplan works to date have shown how future connections could be made to the Depot site; in tandem with how development could be proposed so as not to prejudice the development of either site, the early delivery of housing on the Ford owned land should not be prejudiced by delays in the decision-making process with regards to the Depot (see also comments under Draft Policy RO4 and RO5). It is considered that this would go against the premise of the overarching objective of the emerging Local Plan and the NPPF (2018) Paragraph 59 in terms of the delivery of sustainable development and ensuring the supply of homes without unnecessary delay.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24087 - LaSalle Land Limited Partnership [8362]	Object	<p>Points A and B of Policy SP06: indicates a raft of additional tasks and steps for larger sites including strategic and site-area masterplans, collaborative and partnership working to derive scheme proposals. While LLLP support the need for collaborative working with stakeholders, it is concerned that the requirements set out in SP06 are overly onerous and unjustified. It is not clear why the additional steps and documents are necessary and how they would lead to more efficient or timely development delivery. The NPPF includes opportunities for extensive stakeholder and consultee engagement as well as pre-application review and evolution of development proposals of all scales. This allows for a coherent and effective approach to site development to be undertaken already and therefore already provides the mechanisms to achieve this in the way that paragraph 4.45 of the Local Plan envisages.</p> <p><i>Policy SP06 should be modified by deletion of Point A entirely. Point B should be revised to include flexibility for the provision of supporting documentation on a site by- site basis in accordance with the relevant planning application validation list</i></p>	Noted	No change
23898 - Redrow Homes [6669]	Object	<p>The policy does not define what it considers to be a 'large complex allocation site' and as such could impose a blanket requirement for the submission of a masterplan and a design code as part of the submission for all allocated sites. This is considered to be an unreasonable and unnecessary burden that is not supported by the NPPF or the PPG and is not justified by the individual site allocations. It also has the potential to slow down the delivery of sites, which for a borough with a poor track record of delivery is not sensible.</p> <p><i>For the reasons explained above, clarify in the policy which of the allocated sites fall within the definition of a 'large complex allocation site'.</i></p>	Noted	Consider including a definition for large complex allocation sites.

## POLICY SP06: EFFECTIVE DELIVERY OF DEVELOPMENT

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24021 - Croudace Strategic Ltd [2656]	Object	Policy SP06: Effective Delivery of Development states that proposals for large allocation sites will be expected to be developed in partnership with the Council, infrastructure providers and other relevant organisations, through a collaborative masterplanning approach. Development proposals should submit a supporting statement setting out the sustainable long-term governance and stewardship arrangements for community assets including land, services and facilities such as village halls, community centres, libraries, parks, green spaces, and buildings for sports, leisure, healthcare, education, social, arts and cultural activities. This policy is overly onerous and therefore "unjustified". This policy is therefore considered to be unsound.	N/A	No change
23958 - CEG Land Promotions Limited [5050]	Object	Policy SP06 requires development proposals for large allocation sites to be developed in partnership with the Council, infrastructure providers and relevant organisations through a masterplanning approach. This may include an independent Design Review Panel process, which is an approach supported by the NPPF (paragraph 129). CEG supports this policy and is bringing forward the development of DHGV in this manner, with an independent Design Review Panel process and working in partnership with the Council and other relevant organisations as necessary. A footnote might usefully clarify what constitutes large complex allocation sites as far as the Council is concerned.  <i>A footnote might usefully clarify what constitutes large complex allocation sites, as referenced in criterion A, as far as the Council is concerned.</i>	Noted	Consider including a definition for large complex allocation sites.
23201 - Anglian Water (Mr Stewart Patience) [6824]	Support	We are supportive of the Local Plan policies relating to infrastructure delivery (SP06) Sustainable Design and construction.	Support Welcomed	No further action required
22328 - Anglian Water (Mr Stewart Patience) [6824]	Support	We note that Policy SP06 include reference to the preparation of a masterplan for large complex allocation sites part of a collaborative process working with infrastructure providers including Anglian Water which is supported.	Support Welcomed	No further action required



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>Chapter 5. Resilient Built Environment</b>				
<b>5.1</b>				
22238 - Mr Anthony Cross [4376]	Object	<p>Inclusion of site allocations R25 and R26 in the LDP are inappropriate, unsound and not compliant with legal requirements on the following grounds: failure to prove that more suitable (brownfield) sites do not exist in the borough, or that other site allocations couldn't absorb the 70 dwellings proposed; inadequate consultation with Epping Forest District Council and failure to properly consider the impact of other nearby developments on Blackmore; failure to recognise the increased flood risk resulting from the proposed development; adverse impact on roads, noise levels and safety of existing road users from increased traffic; inadequate local amenities/services; other considerations per full representation.</p> <p><i>Removal of proposed developments R25 and R26 from the plan and reallocation of the 70 dwellings to more suitable brownfield sites in the borough.</i></p>	Noted.	No change.
<b>POLICY BE01: FUTURE PROOFING</b>				
22619 - Mr Ian Palmer [8244]	Object	<p>The plan does not appear to positively embrace the practical implementation of the sentiments set out in BE01 and Chapter 5: reducing carbon emitting traffic, school clear zone and low emission zone.</p> <p><i>Firstly, all new houses and access roads where parking is allowed should be fitted with suitable charging points. Secondly, where in the plan are the areas that will be allocated for vehicle charging. A strategy needs to be developed that considers the physical area requirements for charging. Unless there are significant changes/developments in charging rates and battery energy storage density, then the days of the short refilling time and the concentrated energy of petrochemical fuels will be replaced with different journey planning and recharge stops.</i></p>	Noted. Detailed transport measures relating to electrical vehicles are being considered by the emerging Sustainable Transport Strategy.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22308 - Essex Bridleways Association (Mrs Sue Dobson) [3855]	Object	<p>olicy BE01: we would prefer to see in point g reference to such infrastructure being publicly accessible whilst also being multi-functional.</p> <p><i>To make this Plan sound, we suggest this policy point is reworded thus: 'accessible and multi-functional green and blue infrastructure...'</i></p>	Noted.	Consider rewording to state: 'accessible and multi-functional green and blue infrastructure...'
24287 - Strutt & Parker LLP (Mr. Andy Butcher) [2741] 24317 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Object	<p>Whilst the Council's objectives towards future proofing of development are broadly supported, it is questionable whether it is necessary to set out a detailed planning policy to this effect when a number of the criteria set out comprise a series of aspirations. It is of some concern that Part A of the Policy requires that all applications must take into account..... when the process of development management and determination of applications is far more prescriptive and binary in decision making. It is suggested that Policy BE01 should be set out as supporting text rather than a specific policy.</p> <p><i>It is suggested that Policy BE01 should be set out as supporting text rather than a specific policy.</i></p>	Noted.	No change
22317 - Anglian Water (Mr Stewart Patience) [6824] 23202 - Anglian Water (Mr Stewart Patience) [6824]	Support	Support the reference made to multi functional green and blue infrastructure incorporating the principles of Sustainable Drainage Systems (SuDs) which will help to address sewer flooding and surface water flooding.	Support welcomed.	No further action.
<i>Responding to Climate Change</i>				
23189 - Environment Agency (Mr Pat Abbott) [8308]	Support	<p>The plan rightly identifies the potential impact of climate change and contains a number of policies to address these.</p> <p><i>None specified.</i></p>	Support welcomed.	No further action.
<i>5.13</i>				
22288 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Request clarification footnote to footnote 5 to provide up to date information.</p> <p><i>Additional footnote should be added to 5 as follows - United Kingdom Climate Projections 2018 (UKCP18) has started to consider revised risk associated with sea level change</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>5.16</b>				
22620 - Mr Ian Palmer [8244]	Object	<p>The plan does not appear to positively embrace the practical implementation of reducing carbon emitting traffic, school clear zone and low emission zone.</p> <p><i>Firstly, all new houses and access roads where parking is allowed should be fitted with suitable charging points. Secondly, where in the plan are the areas that will be allocated for vehicle charging. Brentwood is adjacent to 4 main transport routes all of which will need significant improvements to support the traffic from the various local development plans. A strategy needs to be developed that considers the physical area requirements for charging.</i></p>	Noted. Detailed transport measures including provision for to electrical vehicles are being considered by the emerging Sustainable Transport Strategy.	No change.
22544 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	The Thames Chase Plan addresses climate change mitigation and adaptation and could be an opportunity for partnership working between the Council and the Thames Chase Trust (Thames Chase Community Forest).	Noted.	No change.
<b><i>POLICY BE02: SUSTAINABLE CONSTRUCTION AND RESOURCE EFFICIENCY</i></b>				
23679 - Gladman Developments [2774] 23780 - Strutt & Parker LLP (Jen Carroll) [6751] 23959 - CEG Land Promotions Limited [5050] 24022 - Croudace Strategic Ltd [2656] 24093 - Countryside Properties [250]	Object	<p>Part (f) of Policy BE02 requires all proposals to include commercial and domestic scale renewable energy and decentralised energy as part of new development. This is an extremely onerous requirement, particularly for small schemes where it may not be technically feasible. It could also have a huge impact on development viability. Paragraph 153 of the Framework allows for planning policies to require development to include decentralised energy supply. However, it also provides a caveat that this is only where it is viable and feasible.</p> <p><i>To ensure consistency with national policy part (f) of Policy BE02 should be amended as followed: "f. where feasible and viable, include commercial and domestic scale renewable energy and decentralised energy as part of new development."</i></p>	Noted.	Revision to part (f) of Policy BE02 to add "where feasible and viable".

## POLICY BE02: SUSTAINABLE CONSTRUCTION AND RESOURCE EFFICIENCY

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24291 - Strutt & Parker LLP (Mr. Andy Butcher) [2741] 24318 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Object	Whilst the Council's objectives towards sustainable construction and resource efficiency are broadly supported, it is questionable whether it is necessary to set out a detailed planning policy to this effect when a number of the criteria set out comprise a series of aspirations. The requirement to submit details of measures that increase resilience to the threat of climate change at b. is also considered to be over prescriptive when such techniques may vary substantially. The general principles set out at para 5.19 are reflective of the fact that these matters ought more properly to be dealt with by supporting text rather than a specific policy. In addition, we are aware of comments made by the HBF on this policy and we support those comments.  <i>None specified.</i>	Noted.	No change.
22318 - Anglian Water (Mr Stewart Patience) [6824] 23203 - Anglian Water (Mr Stewart Patience) [6824]	Support	Support the requirement to incorporate Sustainable Drainage Systems as part of the design of new developments which will help to address sewer flooding and surface water flooding.  <i>None specified.</i>	Support welcomed	No further action.

***POLICY BE03: CARBON REDUCTION, RENEWABLE ENERGY AND WATER EFFICIENCY***

23781 - Strutt & Parker LLP (Jen Carroll) [6751] 24028 - Croudace Strategic Ltd [2656] 24080 - LaSalle Land Limited Partnership [8362] 24094 - Countryside Properties [250]	Object	It is Government policy to seek to deliver improvements to emissions from buildings through the building regulations regime. As such we do not consider it necessary to include the table at part (a) of this policy. The deliverability and viability of Policy BE03 at Point (a) is uncertain. Additional testing and evidence is required in order to support and justify this policy measure and to show that the policy would be effective if implemented. Should a national zero carbon policy be introduced it will be achieved and applied through building regulations, as noted at paragraph 5.33. If the building regulations are updated then the Council should revisit the policy through a local plan review at that stage.  <i>Unnecessary to include the table at part (a) of this policy. If the building regulations are updated then the Council should revisit the policy through a local plan review, but in the mean time, such matters are to be dealt with through building regulations.</i>	Noted.	To be updated in line with the government's updated regulations.
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## POLICY BE03: CARBON REDUCTION, RENEWABLE ENERGY AND WATER EFFICIENCY

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Water Efficiency</i>				
23190 - Environment Agency (Mr Pat Abbott) [8308]	Support	Support the measures to address the issues of water resources and to reduce water consumption in new development. The need to consider waste water and sewage infrastructure still needs to be strengthened. Where sewerage capacity is identified as insufficient, development should only be permitted if it is demonstrated that improvements will be completed prior to occupation of development. The Brentwood Water Cycle Study (2018) identifies areas where there may be limitations to the waste water infrastructure and therefore where applicants need to carry out appropriate appraisals to assess whether the proposed development will lead to existing waste water infrastructure overloading.  <i>None specified.</i>	Support welcomed.	No further action.

*POLICY BE04: ESTABLISHING LOW CARBON AND RENEWABLE ENERGY INFRASTRUCTURE NETWORK*

23960 - CEG Land Promotions Limited [5050] 23961 - CEG Land Promotions Limited [5050]	Object	Policy BE04 is currently inconsistent with paragraph 153 of the NPPF, which states that local plans can expect to comply with such provision where it is feasible or viable, and with Policy BE03 of the Local Plan. Modifications are proposed in our response to question no. 6 to ensure consistency with the NPPF and between policies in the Plan.  <i>For consistency with paragraph 153 of the NPPF and with Policy BE03 of the Local Plan the following modification are proposed.</i> <i>In relation to Policy BE04 criterion (B):</i> <i>"B. New development of over 500 dwelling units, or brownfield and urban extensions at 500 units or more, or where the clustering of neighbouring sites totals over 500 units, will be expected, where feasible and viable, to incorporate decentralised energy infrastructure in line with the following hierarchy..."</i> <i>and</i> <i>"ii. Where there is no existing heat network, new development will be expected to deliver an onsite heat network, unless demonstrated that this would be unfeasible or would render the development unviable;"</i>	Noted.	Minor change to policy BE04 criteria (B.b) and (B.c) as necessary to ensure consistency with the NPPF.
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## POLICY BE04: ESTABLISHING LOW CARBON AND RENEWABLE ENERGY INFRASTRUCTURE NETWORK

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23782 - Strutt & Parker LLP (Jen Carroll) [6751] 24095 - Countryside Properties [250]	Object	<p>We raise concerns in relation to the deliverability of part (b) of the policy in relation to sites within a cluster of 500 or more dwellings given that neighbouring sites will not necessarily come forward by multiple landowners and developers at similar times. The coordinating and implementation of a heat network to serve smaller scale sites as separate applications but adjacent to other similar sized sites in the locality, is unreasonable and unjustified and could result in a delay in delivery of new homes, resulting in an ineffective local plan.</p> <p><i>It is recommended that the requirement for new development located where 'clusters' of neighbouring sites totals over 500 units should be removed from the policy in order to make the policy effective.</i></p>	Noted.	Minor change to policy BE04 criteria (B.b) and (B.c) as necessary to ensure consistency with the NPPF.
23877 - Redrow Homes [6669]	Object	<p>Criterion B(c) of this policy requires the application of the heat hierarchy to all development proposals. This is an unreasonable and unnecessary burden to apply to all developments that is not supported by national policy or the evidence base. It could limit the deliverability of proposals. It is not reasonable to expect a developer to factor the cost of such an onerous requirement into the development economics for a site and then demonstrate the viability. Such a feature is only justifiable on the largest of the strategic sites and is not relevant to the majority of the site allocations.</p> <p><i>Amend criterion B(c) to clarify that such a requirement is only applicable to schemes of 500 residential units or more.</i></p>	Noted.	Minor change to policy BE04 criteria (B.b) and (B.c) as necessary to ensure consistency with the NPPF.
24029 - Croudace Strategic Ltd [2656]	Object	<p>This policy is considered overly onerous and "unjustified" in relation to the NPPF and therefore unsound. In order to make the policy more effective, it could set out that the delivery of renewable energy infrastructure should be required based on evidence of need and viability and a "viability assessment" (at the time planning applications are submitted/determined) - as per Policy SP04.</p> <p><i>It could set out that the delivery of renewable energy infrastructure should be required based on evidence of need and viability and a "viability assessment" (at the time planning applications are submitted/determined) - as per Policy SP04.</i></p>	Noted.	Minor change to policy BE04 criteria (B.b) and (B.c) as necessary to ensure consistency with the NPPF.

## POLICY BE04: ESTABLISHING LOW CARBON AND RENEWABLE ENERGY INFRASTRUCTURE NETWORK

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY BE08: SUSTAINABLE DRAINAGE</i></b>				
22289 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	In line with paragraph 156 of the NPPF, request additional wording added to end of A. to ensure requirements of Lead Local Flood Authority (LLFA) are met.  <i>Amend Policy BE08 A. as follows - '... adverse impact on water quality. SuDS must be based on the criteria outlined in the Essex County Council SuDS Guide.</i>	Noted.	Additional wording to be added.
24030 - Croudace Strategic Ltd [2656]	Object	This aspect of the policy is therefore considered "consistent" with the NPPF (para 163) which refers to the need for local planning authorities to ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Given the extensive nature of the development, opportunities exist to incorporate the above the SuDs management across the site both locally and site-wide. However, the requirement for prevention if run-off for all rainfall events up to 5mm is in excess of the SuDS manual and is therefore "unjustified". This renders the overall Policy BE08 to be unsound.  <i>None specified.</i>	Noted. Policy BE08 ensures requirements of Lead Local Flood Authority (LLFA) are met.	No change.
22297 - Essex Wildlife Trust (Dr Annie Gordon) [2414] 22331 - Anglian Water (Mr Stewart Patience) [6824] 23191 - Environment Agency (Mr Pat Abbott) [8308] 23204 - Anglian Water (Mr Stewart Patience) [6824]	Support	Welcome the policy commitment to include biodiversity enhancements as an integral feature of SuDS. Support the reference made to applicants demonstrating that they have followed the surface water hierarchy with a connection to the public sewer being considered as a last resort. Also welcome the requirement to demonstrate that there is capacity exists in the public sewerage network where a surface water connection is proposed. Pleased to see previous comments have been incorporated into the supporting text	Support welcomed.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>5.66</b>				
22545 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	The Thames Chase Trust is co-host of the Roding, Beam & Ingrebourne Catchment Partnership, of which Brentwood Borough Council is a member. Please reference the work of Catchment Partnerships in this section.  <i>Please reference the work of Catchment Partnerships in this section.</i>	Noted.	No change.
<b>5.68</b>				
22290 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	The Water Framework Directive (WFD) is a driver for the need for water quality improvements. However, the inclusion of this paragraph within the section relating to SuDS is confusing because ECC as LLFA do not use the criteria associated with water body status to assess pollution control delivered by SuDS.  <i>Delete paragraph 5.68.</i>	Noted.	Consider removal of paragraph 5.68.
<b>POLICY BE09: COMMUNICATIONS INFRASTRUCTURE</b>				
23245 - Mid and South Essex STP (Kerry Harding) [3791]	Support	We are pleased to note that the policies within the LP support our health and wellbeing objectives.	Support welcomed.	No further action.
<b>POLICY BE10: CONNECTING NEW DEVELOPMENTS TO DIGITAL INFRASTRUCTURE</b>				
23881 - Redrow Homes [6669]	Object	Criterion C of this policy requires the developer to make alternative arrangements for broadband provision where a provider has identified that superfast broadband is not practical. This shifts the burden of responsibility from the provider to the developer who is unlikely to be a broadband provider. This is an unreasonable requirement and not supported by national policy. The viability work in the evidence base does not provide a sufficiently robust assessment of the likely costs of providing this and therefore the impact on the viability of the proposed allocation has not been adequately assessed.	Noted.	No change.



## POLICY BE10: CONNECTING NEW DEVELOPMENTS TO DIGITAL INFRASTRUCTURE

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23785 - Strutt & Parker LLP (Jen Carroll) [6751] 24031 - Croudace Strategic Ltd [2656] 24096 - Countryside Properties [250]	Object	<p>We would draw the Council's attention to the Written Ministerial Statement 25-03-2015 which announced the local planning authorities preparing Local Plans "should not set any additional standards or requirements relating to the construction, internal layout or performance of new dwelling". Council's should not seek higher standards than Building Regulations on any other technical standards. We are also unaware of National Policy requiring benches and bins to be connected to mobile digital infrastructure. Proposed Policy BE10 is therefore "unjustified" in light of National policy and therefore unsound.</p> <p><i>Whilst we consider the Local Plan to be legally compliant and compliant with the Duty to Co-Operate, we consider the Local Plan to be unsound. We therefore wish to participate orally at the examination in order to argue the case for recommending the modifications as set out in this form and the accompanying representation.</i></p>	Noted.	No change.
23246 - Mid and South Essex STP (Kerry Harding) [3791]	Support	Pleased to note that the policies within the LP support our health and wellbeing objectives.	Support welcomed.	No further action.
<i>Transport and Connectivity</i>				
23586 - Brentwood Bus and Rail Users' Association (Cllr David Jobbins) [4922]	Object	Outer Area: The sites in the outer area (beyond reasonable walking distance) present some difficulty: for convenience, residents may choose to drive rather than wait for the regular bus services. Concerned that the number and distribution of proposed new dwellings will place an impossible burden on the existing road system. With no reference in the Plan to innovative solutions such as park-and-ride, and only lip service paid to the encouragement of cycling and walking, the Association fails to see how the Plan is sustainably delivered.	Noted. Policies BE11 - BE17 set out transport provision and mitigation requirements for new development. The site specific policies in the Plan require appropriate arrangement as a result of development on site. The Infrastructure Delivery Plan also provides a schedule of infrastructure requirements to help support new development growth planned within the Local Plan. In addition, detailed transport measures are being considered by the emerging Sustainable Transport Strategy.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23583 - Dunton Community Association (Mr Edward Cowen) [6185] 23591 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	<p>The strategy fails to exploit the Elizabeth Line's capacity to accommodate growth in the north of the Borough. The proposal to site a "garden community" adjacent to the London-Southend line and not the Elizabeth Line is inconsistent with the strategy set out in the Statement of Common Ground to which the Authority is a signatory. In the South Essex Joint Strategic Plan: Statement of Common Ground, June 2018, local authorities including the Authority recognise the potential for new garden communities; they note that the opportunities that they offer for the sub-region are dependent on significant investment in road and rail infrastructure; and they conclude that the opening of the Elizabeth Line offers major advantages in terms of connectivity to the new garden communities. Irrational to propose in its Plan a garden community linked not to the Elizabeth Line but to the London-Southend line, which is at capacity.</p> <p><i>In order to make the Plan justified Dunton Hills Garden Village should be removed from the Plan, and housing growth redirected to other areas of the Borough. If a garden community is the most appropriate solution, then it should be linked to the Elizabeth Line.</i></p>	Noted. The Plan's spatial strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives.	No change.
23582 - Brentwood Bus and Rail Users' Association (Cllr David Jobbins) [4922]	Object	<p>There is no mention of how congestion, which already inhibits travel within the borough and is predicted to increase even without the additional housing and business development.</p> <p><i>None specified.</i></p>	Noted. The Transport Assessment assesses the impact of the Local Plan on the local and strategic highways in the borough, up to the end of the proposed plan period. The Transport Assessment produces a Reference Case, which is then used to compare the impact of the Local Plan development.	No change.
23297 - West Horndon Parish Council (Mr Kim Harding) [381]	Object	<p>It is unclear what the strategy is to increase modal share by bicycle. Not only does the Reg 19 Plan not identify specific routes but it does not make clear how cyclists would navigate across key junctions safely. The Reg 19 Plan provides no suggestion that such a route has been properly considered or that it has been secured. The costs identified in the IDP schedule therefore cannot be verified because the evidence does not demonstrate how they have been derived.</p>	Noted. The draft Brentwood Cycle Action Plan (2018) identifies how cycling levels can be increased in the Borough and has developed potential schemes across the Borough.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23588 - Brentwood Bus and Rail Users' Association (Cllr David Jobbins) [4922]	Object	Northern Villages: Existing bus services are not sufficiently attractive to residents to switch from driving. The addition of 169 additional units is unlikely to change the economics for bus companies to increase services. The consequence is higher volumes of traffic on feeder roads into Brentwood. Concerned that the number and distribution of proposed new dwellings will place an impossible burden on the existing road system. With no reference in the Plan to innovative solutions and only lip service paid to the encouragement of cycling and walking, the Association fails to see how the Plan is sustainably delivered.  <i>None specified.</i>	Noted. Policies BE11 - BE17 set out transport provision and mitigation requirements for new development. The site specific policies in the Plan require appropriate arrangement as a result of development on site. The Infrastructure Delivery Plan also provides a schedule of infrastructure requirements to help support new development growth planned within the Local Plan. In addition, detailed transport measures are being considered by the emerging Sustainable Transport Strategy.	No change.
23589 - Brentwood Bus and Rail Users' Association (Cllr David Jobbins) [4922]	Object	DHGV: It is likely that DHGV residents will look towards Basildon and Lakeside for shopping and leisure activities, resulting in minimal consumer spending in the core of Brentwood, with increased capacity and potential new routes spread along the A127/A13 corridor than northwards. Concerned that the number and distribution of proposed new dwellings will place an impossible burden on the existing road system. With no reference in the Plan to innovative solutions such as park-and-ride, and only lip service paid to the encouragement of cycling and walking, the Association fails to see how the Plan is sustainably delivered.  <i>Non specified.</i>	Noted. Policies BE11 - BE17 set out transport provision and mitigation requirements for new development. The site specific policies in the Plan require appropriate arrangement as a result of development on site. The Infrastructure Delivery Plan also provides a schedule of infrastructure requirements to help support new development growth planned within the Local Plan. In addition, detailed transport measures are being considered by the emerging Sustainable Transport Strategy.	No change.
23579 - Brentwood Bus and Rail Users' Association (Cllr David Jobbins) [4922]	Object	There are no references to traffic congestion, to which the Plan will clearly contribute. There are three references to bus services, one in the strategic objective and two in relation to one preferred site for an employment site which "has the potential" for development of bus services i.e. there are none at the moment. It is difficult to see how a plan can be called strategic without proper consideration of public transport within the borough.	Noted. Policies BE11 - BE17 set out transport provision and mitigation requirements for new development. The site specific policies in the Plan require appropriate arrangement as a result of development on site. The Infrastructure Delivery Plan also provides a schedule of infrastructure requirements to help support new development growth planned within the Local Plan. In addition, detailed transport measures are being considered by the emerging Sustainable Transport Strategy.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22346 - Essex County Council (Mrs Anne Clitheroe) [6776] 23160 - Thurrock Borough Council (Mr Richard Hatter) [2461]	Object	<p>Local Plan needs to be supported by transport modelling(site specific, local and cumulative impacts, infrastructure, and/or mitigation measures, costings and phasing).</p> <p>BBC need the confidence, and assurance that it can identify up-front the required developer funded transport mitigation measures, and that such mitigation measures are covered within the Local Plan site allocation policies and accounted for in both viability and IDP work.</p> <p><i>Specific additional evidence base required, including:</i></p> <p><i>* A more fully developed transport evidence base that includes cumulative and site specific impacts of development on the local and strategic highway network and to identify further infrastructure and /or mitigation measures required together with costing and phasing;</i></p> <p><i>* An up to date Infrastructure Delivery Plan (IDP) that includes infrastructure costs, phasing, delivery and viability.</i></p>	Noted.	No change. Consider ongoing work and the Duty to Cooperate with Essex County Council.
23587 - Brentwood Bus and Rail Users' Association (Cllr David Jobbins) [4922]	Object	Outer Area: The sites in the outer area (beyond reasonable walking distance) present some difficulty: for convenience, residents may choose to drive rather than wait for the regular bus services. Concerned that the number and distribution of proposed new dwellings will place an impossible burden on the existing road system. With no reference in the Plan to innovative solutions such as park-and-ride, and only lip service paid to the encouragement of cycling and walking, the Association fails to see how the Plan is sustainably delivered.	Noted. Please refer to Transport and Connectivity section, chapter 5 of the Pre-Submission Local Plan.	No change.
23295 - West Horndon Parish Council (Mr Kim Harding) [381]	Object	Transport Assessment states that "This (Sustainable Measures) seems a proportionate and pragmatic approach [...]", but assumed numbers of car driver trips once 'sustainable measures' have been applied are minimal: In the morning peak, there would be a reduction of 239 car driver trips out of a total of 22,499 trips (1.06%), in the evening peak there would be a reduction of 194 car driver trips out of a total of 22,484 trips (0.86%) (tables 7.5 and 7.6). This is not considered a sustainable movement strategy therefore the Reg 19 Plan is not justified.	Noted.	No change.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23997 - Bellway Homes and Crest Nicholson [8351]	Support	The general approach taken to transport within policies BE11 to BE17 is supported and it can be seen that these policies are feeding through into the site specific policies.	Support welcomed.	No further action.
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<i>5.88</i>				
22186 - Trailnet CIC (Mr Geoff Fletcher) [8194]	Support	The Cycle Brentwood group has surveyed residents regarding their attitudes to cycling and the overwhelming reason that they don't cycle more is their perception of cycling as a dangerous activity. With the amount of open land in the borough, developing off-road cycle routes should be a priority. This will encourage more people, especially families, to cycle for leisure and maybe transport. Where off-road routes are not appropriate, more provision must be made for segregated cycle paths alongside busy roads, or marked lanes in combination with traffic calming measures on quieter roads.  <i>None specified.</i>	Noted.	No change.
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22546 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	The Thames Chase Plan actively promotes sustainable transport and encourages walking, cycling and horse riding.  <i>The Thames Chase Community Forest should be referenced in this section.</i>	Noted.	No change.
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<i><b>POLICY BE11: STRATEGIC TRANSPORT INFRASTRUCTURE</b></i>				
22347 - Essex County Council (Mrs Anne Clitheroe) [6776] 24339 - Childerditch Industrial Estate [8371]	Object	Criteria B. b. needs to make it clear who BBC will work with in relation to the matter. This would be consistent with the wording for criteria B. a.  <i>Amend Policy BE11 B. b. as follows - 'The Council will work with all relevant statutory bodies, stakeholders and passenger transport providers to consider .... '</i>	Noted.	Consider accordingly.
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## POLICY BE11: STRATEGIC TRANSPORT INFRASTRUCTURE

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23195 - Highways England (Heather Archer) [8309]	Object	<p>The Local Plan developments are expected to have an impact on the strategic road network. Policies BE11 and BE16 state, "any significant impacts from the development on the highway network on highway safety must be effectively mitigated...". These policies should be amended to amended to reflect that there is a need to mitigate the impacts of the full Local Plan rather than the developments within it individually. Accordingly we are looking for evidence on the cumulative impacts of the Local Plan.</p> <p><i>For clarity, we suggest that the wording is amended to reflect that there is a need to mitigate the impacts of the full Local Plan rather than the developments within it individually. Any single development may have no discernible impact whereas cumulatively the Local Plan impacts may require mitigation. Accordingly we are looking for evidence on the cumulative impacts of the Local Plan. Similarly, you may wish to amend the wording of policies relating to individual allocations.</i></p>	Noted.	Consider accordingly.
23123 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>There are no specific highway mitigation measures provided in the Plan, just a general statement. Highway modelling should have been tested to determine impact in development locations. It is questionable whether it can be adequately demonstrated by the Plan that the allocations chosen represent the most sustainable option without specific highway mitigation measures that will be necessary to make them deliverable and sustainable. Without this work, the capacity to deliver new communities and homes becomes hindered by a lack of infrastructure capacity and outline solutions to overcome them. It is not considered that Policy BE11 is effective.</p> <p><i>BE11 and the land allocations should have been informed by highway modelling that tests highway mitigation solutions to mitigate impact caused by development. This work should be repeated and the Plan amended in light of its findings.</i></p>	Noted. Highway modelling undertaken by the Transport Assessment indicates that sustainable transport should be the main emphasis of the local plan infrastructure requirements. Policies BE11-BE17 should be read in conjunction with site specific policies which set out appropriate arrangement as a result of development on site. The Infrastructure Delivery Plan provides a schedule of infrastructure requirements to help support new development growth planned within the Local Plan. In addition, detailed transport measures are being considered by the emerging Sustainable Transport Strategy.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22353 - Rochford District Council (Planning Policy) [4178] 23229 - Transport for London (Mr Richard Carr) [7185] 23230 - Transport for London (Mr Richard Carr) [7185] 23276 - c2c Rail (Chris Atkinson) [8280] 23277 - c2c Rail (Chris Atkinson) [8280] 23747 - St Modwen Properties PLC [5124] 23794 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738] 24032 - Croudace Strategic Ltd [2656]	Support	Agree with the need to maximise capacity of strategic transport infrastructure, modal change and improvement to connectivity across south Essex. Support the intention to maximise the value of railway connectivity by ensuring that new development is well connected to rail stations by foot, cycle and public transport and introducing parking controls where necessary. Welcome the approach to prioritise access to stations by sustainable modes of transport and to seek improvements to links, access, public realm and station capacity. Welcomes the intention to seek highway improvements and particularly to seek suitable non highway measures and/or improvements to walking and cycling that may help to mitigate traffic impacts as a result of development.	Support welcomed.	No further action.
		<i>None specified.</i>		
23962 - CEG Land Promotions Limited [5050]	Support	BE11 Strategic Transport Infrastructure (page 92 - 94) CEG supports the objectives of Policy BE11, particularly improving multi modal integration and/or capacity at train stations, which is consistent with the NPPF (paragraph 110(a)). In relation to criterion B(ii) a modification is proposed to ensure consistency with Policy R01.  <i>BE11 Strategic Transport Infrastructure (page 92 - 94): For consistency with Policy R01, the following modification is proposed: "B. ii) improving the public realm, circulation arrangement and capacity of West Horndon station as well as creating associated multimodal interchange through phases to support new residents and employees at West Horndon and Dunton Hills Garden Village"</i>	Noted.	No change.
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5.92				
22348 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	Request amendment to paragraph 5.92 to reflect current situation. Both stations have existing forecourts, the policy should be seeking to improve these.  <i>Amend last sentence of paragraph 5.92 as follows - '... with improved forecourt and pedestrian crossing facilities.'</i>	Noted.	Consider accordingly.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Improvements to the train stations</i>				
23348 - Mrs Carol Minter [2999]	Object	<p>The Council are living in Never Never Land if they think people will use alternative forms of transport to the car .... people will use cars! West Horndon station is a 2 platform station which barely copes (in the rush hour) with the sudden impact of hundreds of people descending on such a tiny space. There is very little parking space and nowhere to allocate further spaces. Nowhere for extra infrastructure to accommodate bus interchange or bicycle storage.</p> <p><i>I believe the plan to be unsound and not thought out thoroughly with common sense in mind. It is full of "ideas" that have not been sensibly thought through. Development at West Horndon and Dunton is unrealistic and unworkable.</i></p>	Noted.	No change.
23296 - West Horndon Parish Council (Mr Kim Harding) [381]	Object	<p>Despite the Transport Assessment stating that "an increased capacity on the existing train service will be central to the new cycling, walking and bus movements of the new residents and employees accessing the four sites.", there are no identified plans for investment in increased passenger rail capacity on C2C line, and no suggestion in the Reg 19 Plan or the evidence base as to the scale of improvements required. No evidence supporting the Reg 19 Plan provides assessment of accessibility of the train station.</p>	Noted. Work is ongoing with C2C and other stakeholders regarding capacity and accessibility of the train station. Detailed measures with regards to improvements to area surrounding West Horndon station are considered by the Southern Brentwood Corridor Sustainable Transport Vision.	No change.
23281 - c2c Rail (Chris Atkinson) [8280]	Support	<p>Installing ETCS Level 2 system on the core section of current c2c route would unlock the possibility for a new higher-frequency timetable that can be operated while maintaining current punctuality levels, and would provide sufficient additional capacity across the route. A funding strategy is currently being developed to gain support from the Department for Transport. If the Outline Business Case demonstrates a positive BCR for this scheme, it is essential that Brentwood Council supports its development to mitigate the existing risk to the proposed allocations. The capital costs would require contributions from developers and others who benefit through appropriate mechanisms.</p>	Support welcome	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>5.96</b>				
22183 - Mr DAVID FISHER [8184]	Object	<p>1: Unambiguous statement for improving station capacity should be stated. Shenfield station struggles with peak-time pedestrian flow, this is unlikely to improve while having single access points to platforms.</p> <p>2: The taxi parking around the station remains a consistent problem, causing risk to pedestrians and road users.</p> <p><i>AMEND: As mentioned above, enhancement to Shenfield station would centre around improving station capacity, pedestrian and cycle infrastructure, taxi rank provisions and bus services and where necessary, parking controls</i></p>	Noted.	No change.
22349 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Additional wording requested to the end of paragraph 5.96 b. to ensure the proposed improvements can be appropriately funded.</p> <p><i>Insert additional sentence at end of paragraph 5.96 b. as follows - Where appropriate contributions will therefore be sought from nearby developments.</i></p>	Noted.	Consider accordingly.
23231 - Transport for London (Mr Richard Carr) [7185] 23795 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738]	Support	Support. Revised timescale for the start of Elizabeth Line services is to be announced shortly.	Support welcome.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>5.102</i>				
22351 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Recommended that reference made to A127 Task Force. Has representation from all South Essex authorities including BBC. Task Force will oversee public affairs interaction between Councils and Government to ensure route seen as strategic and potential candidate for re-trunking to bring about long-term improvement required for area of South Essex with over 600,000 residents. Planning and design work for any improvement of this scale require a short-term, medium and long term phasing. Whilst A127 is main focus ECC would be looking to work collaboratively with BBC and other councils in area on impact on A128 and M25 Junction 28 scheme.</p> <p><i>Insert additional point to paragraph 5.102 as follows -</i></p> <p><i>iv. The A127 Task Force has representation from all South Essex authorities including BBC. This Task Force will oversee much of the public affairs interaction between the Councils and Government to ensure that the route is seen as strategic and as a potential candidate for re-trunking in order to bring about the long-term improvement required for an area of South Essex with over 600,000 residents. The planning and design work for any improvement of this scale will of necessity require a short-term, medium and long term phasing. Whilst the A127 is the main focus ECC would be looking to work collaboratively with BBC and other councils in the area on the impact on the A128 and the M25 Junction 28 scheme.</i></p>	Noted.	Consider accordingly.
22350 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>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.</p> <p><i>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 the paragraph to explain this.</i></p>	Noted.	Consider accordingly.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>5.105</b>				
24340 - Childerditch Industrial Estate [8371]	Object	<p>Paragraph 5.105 states that, within the South Brentwood Growth Corridor, there is a recognition that provision of sustainable transport in this area is poor. Since the Draft Local Plan Regulation 18 Consultation, the Council has published an Infrastructure Delivery Plan (IDP) for the Borough. This includes, at Figure 3.14 of Chapter 3, a sustainable transport plan for the Southern Growth Corridor, which includes indicative locations for new cycle ways and a new bus route to connect Childerditch Industrial Estate, Brentwood Enterprise Park, Dunton Hills Garden Village and West Horndon Industrial Estate (to be redeveloped). We support the principle of improving walking and cycling links within the land owned by our client, which extends to Little Warley Hall Lane. However, we would question the extent to which these new cycle ways could be delivered along the A127 corridor, as this would require every land owner to be committed to this initiative and an identification of funding. It is also not clear within the IDP who would be responsible for delivering this infrastructure improvement i.e. would this be the responsibility of Essex County Council, Brentwood Borough Council or landowners. This point needs to be clarified. In respect of the new bus route loop that is shown within the IDP at Childerditch Industrial Estate, whilst our client broadly supports the principle of a bus service at the Estate, they consider that the circulatory route shown within the IDP is too prescriptive and misleading, and at this stage, a broad arrow would be sufficient within the IDP. Details of how the Estate could be served can be dealt with as part of the iterative masterplan process. If a bus service from the A127 were to drop off/pick up were to be brought forward, our client could support this if the bus were to stop outside the Estate, turn and move back down Childerditch Hall Drive</p> <p><i>The circulatory route shown within the IDP is too prescriptive and misleading, and at this stage, a broad arrow would be sufficient within the IDP. Details of how the Estate could be served can be dealt with as part of the iterative masterplan process.</i></p>	<p>Noted. Detailed transport measures for the Southern Growth Corridor are being considered by the Southern Brentwood Corridor Sustainable Transport Vision work; this is to be read alongside the Transport Assessment and the Infrastructure Delivery Plan.</p>	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23720 - S&J Padfield and Partners (SJP) [6122] 23796 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738]	Support	Support the intent of Paragraph 5.105 in seeking to improve sustainable transport measures in the South Brentwood Growth Corridor. We would caution that transport improvements should be undertaken and required on a site specific basis, recognising the scale of new growth at each location. In the case of site E10 at Codham Hall, the employment uses on site are existing and therefore the allocation will provide for modest further growth, which should be recognised in considering any transport improvements required.	Support welcome	No further action
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<i>5.106</i>				
23126 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>P5.106-107 acknowledge the Lower Thames Crossing preferred route and that it is not expected to have a direct impact on Brentwood Borough in terms of land safeguarding. However, following the engagement of authorities in Essex, Highways England has accepted that its impact modelling was deficient in determining how driver behaviour in South Essex and further afield could alter when the scheme opens. Highways England are now taking steps to incorporate growth proposals set out in Local Plans in the vicinity to address this and identify any measures needed to the scheme or nearby routes to mitigate any adverse impacts.</p> <p><i>Paragraph 5.106 should be amended to include reference that local authorities have secured additional testing within the Lower Thames Crossing modelling being undertaken by Highways England to determine the extent of local impacts on the road network arising from Local Plan growth.</i></p>	Noted.	To be updated following ongoing evidence work and discussion.
23232 - Transport for London (Mr Richard Carr) [7185] 23748 - St Modwen Properties PLC [5124]	Support	We agree with the outlined approach of working with relevant bodies regarding the impact of the Lower Thames Crossing and any mitigations that are needed on the A127, A12 and local road network, and would be happy to work with you and other bodies to ensure the appropriate mitigation is delivered.	Support welcomed.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>5.107</i>				
23749 - St Modwen Properties PLC [5124]	Support	Concur with paragraph 5.107, which raises doubt on the scale and timelines associated with the impacts of the proposed Lower Thames Crossing. Having liaised extensively with the LTC teams, we are aware of the proposals and their relationship with the Brentwood Enterprise Park. We can confirm that the LTC teams and ourselves are committed to the realisation of both projects in a mutually acceptable manner and discussions are on-going in this regard.  <i>No change proposed</i>	Noted.	No change.
23233 - Transport for London (Mr Richard Carr) [7185]	Support	We agree with the outlined approach of working with relevant bodies regarding the impact of the Lower Thames Crossing and any mitigations that are needed on the A127, A12 and local road network, and would be happy to work with you and other bodies to ensure the appropriate mitigation is delivered.	Support welcomed.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY BE12: CAR-LIMITED DEVELOPMENT</i></b>				
22374 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Principle of car limited development (CLD) policy is supported.</p> <p>Policy references CLD being considered at Brentwood Town Centre, District Shopping Centres, railway stations, strategic employment sites. Unclear why locations separated or is intention to refer to locations individually?</p> <p>Considered reasonable that CLD considered at 'District Shopping Centres'.</p> <p>Unclear how CLD considered at Strategic Employment Allocations (inc. Brentwood Enterprise Park). Unclear how employees expected to travel via safe and direct walking and cycling routes given location (M25, J29) without significant improvements to sustainable transport network, including provision of new passenger transport services.</p> <p>Criteria b and c repeats Policy BE13.</p> <p>Unclear how methods identified in criteria d. would be implemented.</p> <p><i>It is recommended that the policy wording is amended to address the points raised in order to remove ambiguity and provide clarity for the decision maker in relevant planning applications.</i></p>	Noted. Transport measures for the wider area are to be considered by the Southern Brentwood Corridor Sustainable Transport Vision work.	Consider accordingly.
23234 - Transport for London (Mr Richard Carr) [7185]	Support	TfL welcomes the inclusion of a policy on car limited development which reflects the approach being taken in London.	Support welcomed	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>5.109</b>				
22621 - Mr Ian Palmer [8244]	Object	<p>If you take the very laudable sentiments for supporting school clear zones, low emission zones and the need to significantly reduce carbon emitting traffic, the plan does not appear to positively embrace the practical implementation of these sentiments.</p> <p><i>Firstly, all new houses and access roads where parking is allowed should be fitted with suitable charging points. Secondly, where in the plan are the areas that will be allocated for vehicle charging. A strategy needs to be developed that considers the physical area requirements for charging. Unless there are significant changes/developments in charging rates and battery energy storage density, then the days of the short refilling time and the concentrated energy of petrochemical fuels will be replaced with different journey planning and recharge stops. But where might they be situated given the pressure on housing and the wish for them to be adjacent to road junctions?</i></p>	Noted. Policy BE15: Electric and low emission vehicles address charging points.	No change
22561 - Gerald Downey [4671]	Support	Walking or cycling along where I live (Priests Lane) is very dangerous given the volume and speed of vehicles coupled with the very narrow road. I would support further improvements to making Brentwood Pedestrian and Cycle friendly.	Support welcomed.	No further action.
<b>POLICY BE13: SUSTAINABLE MEANS OF TRAVEL AND WALKABLE STREETS</b>				
22376 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Amendment required to seek distinction between new and existing development and terminology to correctly refer to 'passenger transport'.</p> <p><i>Amend Policy BE13 B. b. as follows -</i></p> <p><i>'... good accessibility for passenger transport within sites and between sites and adjacent areas, and where appropriate improve areas where passenger transport, ...'</i></p>	Noted	Consider changing criteria B section b: '... good accessibility for passenger transport within sites and between sites and adjacent areas, and where appropriate improve areas where passenger transport, ...'

## POLICY BE13: SUSTAINABLE MEANS OF TRAVEL AND WALKABLE STREETS

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22309 - Essex Bridleways Association (Mrs Sue Dobson) [3855]	Object	<p>Whilst the aspiration of the Plan is to encourage sustainable transport and reduce peoples' dependence on the private car, if safe off-road routes are being provided then they should be open to all users - including equestrians.</p> <p><i>To make this Plan fully inclusive and to not discriminate against any user group, and therefore sound, we suggest that the term 'multi-user route' is used rather than singling out pedestrians and cyclists. After all, a route that is accessible on horseback is also accessible to all other users - especially the disabled in wheelchairs/mobility scooters and parents with double buggies.</i></p>	Noted	Consider using 'multi-user'
23750 - St Modwen Properties PLC [5124]	Object	<p>Policy BE13 should be amended so that it is made clear that it does not have the effect of imposing any requirements on the allocated sites that are in addition to those set out in the individual site allocation policies. Policy BE13 should acknowledge that site specific policies provide details of how sustainable travel opportunities will be achieved in respect of each site.</p> <p><i>Policy BE13 should be clearer that it does not impose any additional requirements over the site specific policies.</i></p>	Noted.	No change
23721 - S&J Padfield and Partners (SJP) [6122]	Object	<p>Policy BE13 refers to sustainable means of travel, setting out criteria for new development. Sites allocated for development have site specific policies within the Local Plan, which include criteria on transport and it is not currently clear whether Policy BE13 imposes additional requirements. In order to be effective in accordance with the tests of soundness, Policy BE13 should therefore be clearer that it does not impose additional requirements.</p> <p><i>Policy BE13 should be clearer that it does not impose any additional requirements over the site specific policies in order to be effective.</i></p>	Noted	No change.



## POLICY BE13: SUSTAINABLE MEANS OF TRAVEL AND WALKABLE STREETS

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22354 - Rochford District Council (Planning Policy) [4178] 23235 - Transport for London (Mr Richard Carr) [7185] 23247 - Mid and South Essex STP (Kerry Harding) [3791] 23312 - Greater London Authority (Mr Jörn Peters) [6093] 24033 - Croudace Strategic Ltd [2656]	Support	BE13 seek to secure developments that are, inter-alia, designed to make necessary contributions to the improvement of existing infrastructure and provision of new infrastructure; be consistent and contribute to the implementation of the Essex County Council's Development Management Policies and include Transport Assessments and Travel Plans. This aligns with the NPPF (section 9) "Promoting Sustainable Transport" and is therefore considered "justified" and sound.	Support welcomed.	No further action.
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<i>5.111</i>				
22562 - Gerald Downey [4671]	Support	Strongly support this.	Support welcomed.	No further action.
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<i>5.112</i>				
22547 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	The Thames Chase Plan has a focus on Access and Sustainable Transport, actively encouraging walking, cycling and horse riding. The Thames Chase Community Forest should be referenced in this section.  <i>The Thames Chase Community Forest should be referenced in this section.</i>	Noted.	No change.
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<i>POLICY BE14: SUSTAINABLE PASSENGER TRANSPORT</i>				
22378 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	ECC's Development Management Policies February 2011 provide guidance on the development requirements for the provision of passenger transport. Reference should be made to the requirement to have consideration to these.  <i>Insert additional criteria to Policy BE14 after A. as follows -</i>  <i>Sustainable passenger transport provision should have consideration to the Essex County Council Development Management Policies, or successor.</i>	Noted.	TBC.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>5.121</b>				
23797 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738]	Support	Support.	Support welcomed.	No further action.
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<b>POLICY BE15: ELECTRIC AND LOW EMISSION VEHICLES</b>				
22380 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>As currently worded the policy only requires consideration of such infrastructure at major new developments. Points may be located at other locations. This is not consistent with the policy's supporting text or paragraph 110 of the NPPF.</p> <p><i>Replace Criteria A. of Policy BE15 with the following wording -</i></p> <p><i>New dwellings and non-residential buildings shall provide convenient access to Electric Vehicle (EV) charging point infrastructure.</i></p>	Noted.	Revision TBC.
<hr/>				
<b>POLICY BE16: MITIGATING THE TRANSPORT IMPACTS OF DEVELOPMENT</b>				
23197 - Highways England (Heather Archer) [8309]	Object	<p>The Local Plan developments are expected to have an impact on the strategic road network. Policies BE11 and BE16 state, "any significant impacts from the development on the highway network on highway safety must be effectively mitigated...". These policies should be amended to amended to reflect that there is a need to mitigate the impacts of the full Local Plan rather than the developments within it individually. Accordingly we are looking for evidence on the cumulative impacts of the Local Plan.</p> <p><i>For clarity, we suggest that the wording is amended to reflect that there is a need to mitigate the impacts of the full Local Plan rather than the developments within it individually. Any single development may have no discernible impact whereas cumulatively the Local Plan impacts may require mitigation. Accordingly we are looking for evidence on the cumulative impacts of the Local Plan. Similarly, you may wish to amend the wording of policies relating to individual allocations.</i></p>	Noted.	Consider accordingly.
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## POLICY BE16: MITIGATING THE TRANSPORT IMPACTS OF DEVELOPMENT

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22386 - Essex County Council (Mrs Anne Clitheroe) [6776] 23882 - Redrow Homes [6669]	Object	The wording in Criteria A needs to be amended to ensure that the policy is positively prepared, and is consistent with paragraph 108 of the NPPF, particularly criterion c.  <i>Amend Policy BE16 A. as follows -</i>  <i>A. Developments should seek to ensure that any significant impacts 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.</i>	Noted.	No change.
22597 - Cllr Philip Mynott [8283]	Object	The Plan fails to support its own staed objectives. It is fundamentally contradictory. [With regard to proposed development site impacts on the highways in terms of junction capacity and associated congestion.]  <i>A ground up rethink of the plan, starting from a realistic assessment of what development might have a transport and traffic impact that was acceptable and practicably capable of being resolved.</i>	Noted. Transport impacts as a result of planned growth from the Plan as well as sustainable transport measures are being considered by the Transport Assessment.	No change.
22355 - Rochford District Council (Planning Policy) [4178] 23236 - Transport for London (Mr Richard Carr) [7185]	Support	The Council is broadly supportive of Policy BE16 and acknowledges the importance of ensuring that new developments are sustainably supported by transport infrastructure.	Support welcomed.	No further action.
<i>Managing Parking</i>				
22420 - MR Graham Clegg [5485]	Support	Parking provision needs to be carefully handled if the Council intends to re-develop some of its own car parks.	Noted. Support welcomed.	No further action.
<i>POLICY BE17: PARKING STANDARDS</i>				
22387 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	Amendment is requested to criteria A of the policy in order to reflect the current position in respect of parking policy.  <i>Amend Policy BE17 A. as follows -</i>  <i>'... Essex Parking Standards - Design and Good Practice (2009), or as amended....'</i>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24034 - Croudace Strategic Ltd [2656]	Object	The imposed parking standards are subject to the site's ability to minimise pressure on land and encourage the use of alternative modes of transport, therefore Policy BE17 is inconsistent with the NPPF (para 105). Policy BE12 also deals with "parking matters", but is not aligned with Policy BE17. This adds further inconsistency, in addition to Policy BE17 itself being "inconsistent" with the NPPF. It is therefore presently unsound.	Noted.	No change

*5.143*

22548 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	The Thames Chase Community Forest should be referenced as key GBI in this section.  <i>The Thames Chase Community Forest should be referenced as key GBI in this section.</i>	Noted. Thames Chase Community Forest is already referred to in this section.	No change.
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*5.145*

22549 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	Working with environmental charities should also be referenced e.g. the Thames Chase Trust is the body with overall responsibility for overseeing the continued development of the Thames Chase Community Forest in Brentwood.  <i>Working with environmental charities should also be referenced e.g. the Thames Chase Trust is the body with overall responsibility for overseeing the continued development of the Thames Chase Community Forest in Brentwood.</i>	Noted.	No change.
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY BE18: GREEN AND BLUE INFRASTRUCTURE</i></b>				
22321 - Anglian Water (Mr Stewart Patience) [6824] 23209 - Anglian Water (Mr Stewart Patience) [6824]	Object	<p>uggest clarification of wording to make it clear that wastewater treatment capacity is made available by the sewage companies and not developers who have a role in funding improvements to the network itself.</p> <p><i>Clarification of wording as suggested: "f. seek to improve the water environment and that demonstrate that adequate wastewater infrastructure capacity is available or can be provided in time to serve the development;"</i></p> <p><i>Wlcome the opportunity to enter into a Statement of Common Ground or similar in relation to the outstanding points set out above prior to the examination.</i></p>	Noted.	No change.
22389 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Additional wording requested to ensure the policy considers connectivity for wildlife and people in line with paragraph 91 of the NPPF.</p> <p><i>Add the following wording at the end of B. b. -</i></p> <p><i>'....and systems to improve connectivity for wildlife and people;'</i></p>	Noted.	Consider adding text to criteria 'B' section 'b': '....and systems to improve connectivity for wildlife and people;'
23883 - Redrow Homes [6669]	Object	<p>Criterion B(a) requires development proposals to dictate the decision-making process. It is assumed that this is an error in drafting. Such a requirement is best-placed in the supporting text with clarification that it will be the way in which the Council will handle decision-making.</p> <p><i>Criterion B(a) is best-placed in the supporting text with clarification that it will be the way in which the Council will handle decision-making.</i></p>	Noted and agreed.	Consider rewording criteria B section 'a' to ensure greater clarity.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23884 - Redrow Homes [6669]	Object	<p>Criterion B(f) requires improvements to be made to the water environment. Such a requirement is not justified by national policy as it is not for development proposals to resolve existing issues - development proposals can only mitigate the impact of the development proposed. Criterion B(g) requires development proposals to eliminate misconnections between foul and surface water networks. This can only be achieved where the whole site is being redeveloped and it cannot remove misconnections that are outside of the developers control. The concerns raised must be addressed as criterion C seeks financial contributions where the measures required are not possible.</p> <p><i>Remove the reference to improving the water environment in criterion B(f) as a requirement for all development proposals.</i></p> <p><i>Amend criterion B(g) to make it clear that the requirement relates the connections within the development site where the development proposals relate.</i></p>	Noted.	No change.
22310 - Essex Bridleways Association (Mrs Sue Dobson) [3855]	Object	<p>Policy BE18: point b sets out the requirements for any new development in relation to green and blue infrastructure and we suggest that it is also important for opportunities for access to such infrastructure to be incorporated into the Plan.</p> <p><i>To make this Plan sound, we suggest that point b is reworded thus: '...maximise opportunities for the provision, restoration, enhancement, accessibility and connection...'</i></p>	Noted.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24035 - Croudace Strategic Ltd [2656]	Object	<p>Points A-I of Policy BE18 identify the measures by which development proposals can maximise opportunities to protect and enhance green and blue infrastructure, aligning with the NPPF (section 15) "Conserving and Enhancing the Natural Environment". However, it is presently unclear how any net gains/losses and any associated requirements would be measured/calculated, or the mechanism by which the Council or developer would deliver this. In addition, the requirement for a developer to ensure there is sufficient foul capacity within the local network before a development commences is unsound, it is ultimately the Water Authority's responsibility to ensure sufficient capacity.</p> <p><i>None specified.</i></p>	Noted.	No change
22298 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Support	<p>We welcome the commitment to protect and enhance green and blue infrastructure, with the caveat that the wording should be amended to include mention of biodiversity.</p> <p><i>Wording should be amended to include mention of biodiversity, as follows:</i></p> <p><i>borough's network of green and blue infrastructure (GBI) and should be protected, planned, enhanced and managed "to maximise biodiversity"</i></p> <p><i>i. deliver "measurable" environmental net gains; if there is a net loss from the development, provide provisions through offsetting. This should be quantified using a recognised biodiversity metric such as the Defra metric.</i></p>	Support welcomed.	Consider rewording policy to include '...protected, planned, enhanced, and managed "to maximise biodiversity"', and amend criteria 'B' section 'i' to include 'deliver "measurable" environmental net gains'.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22364 - Rochford District Council (Planning Policy) [4178] 22372 - Sport England (Mr. Roy Warren) [4294] 23192 - Environment Agency (Mr Pat Abbott) [8308] 23306 - Natural England (Ms Louise Oliver) [8299]	Support	The policy is supported.  <i>The supporting text could be enhanced by acknowledging the role of natural flood management: reducing flooding by working with natural process, reconnecting watercourses with floodplains to enhance flood storage in times of need, and taking opportunities to restore watercourses to a naturalised state. This should be considered and incorporated into developments wherever opportunities arise. As well as contributing to reducing flood risk, such schemes can enhance the blue infrastructure and contribute to enhancing biodiversity.</i>	Support welcomed.	No change.
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<i>5.151</i> 22550 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	Please reference the Thames Chase Community Forest in this section. The Thames Chase Trust is host of the South Essex Catchment Partnership and co-host of the Roding, Beam & Ingrebourne Catchment Partnership.  <i>Please reference the Thames Chase Community Forest in this section.</i>	Support welcomed.	Consider referencing the Thames Chase Community Forest.
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<i>5.152</i> 23193 - Environment Agency (Mr Pat Abbott) [8308]	Support	We feel the wording in 5.152 could be modified, as it seems to relate to the effect of development on watercourses with either a poor or moderate status, the duty to prevent deterioration of water body status should apply to all water bodies irrespective of their current status.  <i>Modify wording in 5.152 as appropriate.</i>	Noted.	No change.
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>5.155</i>				
23798 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738]	Support	Support.	Support welcomed	No further action
<i>5.156</i>				
22551 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	Please change 'Thames Chase Forest' to 'Thames Chase Community Forest'.  <i>Please change 'Thames Chase Forest' to 'Thames Chase Community Forest'.</i>	Noted.	Amend accordingly.
<i>POLICY BE19: ACCESS TO NATURE</i>				
22299 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Support	Nature friendly development design should include integral features such as swift bricks, sparrow terraces, bat roosts, bee hotels etc. It should also have features and green corridors to help invertebrates, reptiles, hedgehogs and other mammals; wildlife-permeable boundaries between gardens and open spaces; wildflower verges and hedgerows integrated with the development.  <i>We recommend that wording should be amended to include mention of biodiversity, as follows: b. these measures should be protected, planned, designed and managed as integrated features of green and blue infrastructure "to maximise biodiversity"</i>	Noted.	Consider including "to maximise biodiversity" at the end of criteria b.
24036 - Croudace Strategic Ltd [2656]	Support	Policy BE19 seeks that major developers provide direct access to nature and that this provision is protected, planned, designed and managed as an integrated feature of the landscape. Developments in areas that are more than 1km walking distance from an accessible green open space should also seek opportunities to improve resident's experience and interaction with nature by means of design. The NPPF (section 8) "Promoting Healthy and Safe Communities" states that planning policies should be based on robust and up-to-date assessments of the need for open space, this policy is therefore deemed to be "consistent" with the NPPF and sound.	Support welcomed.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY BE20: ALLOTMENTS AND COMMUNITY FOOD GROWING SPACE</i></b>				
24292 - Strutt & Parker LLP (Mr. Andy Butcher) [2741] 24319 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Object	<p>Whilst the Council's aspirations for providing allotments are acknowledged, the policy as set out provides for no clear thresholds as to when such space should be provided which is not justified in the terms set out. On this basis, it is recommended that the policy should either be omitted and dealt with by the text to the PSLP or justified against thresholds or site specific requirements. In this respect, it may be that large strategic sites may need to include a requirement but it is certainly not necessary for smaller or medium sized sites, such as those the subject of these representations.</p> <p><i>It is recommended that the policy should either be omitted and dealt with by the text to the PSLP or justified against thresholds or site specific requirements</i></p>	Noted.	No change.
23885 - Redrow Homes [6669]	Object	<p>Neither the policy nor the supporting text identifies the scale of development where this policy would be applicable. Such a requirement will not be feasible on some allocated sites with site constraints or where the scale of development does not support such provision. It is an unreasonable and unnecessary requirement for any scale of residential development and should be restricted to the larger allocation sites of 500 units or more. This blanket requirement will reduce the development yield resulting in allocations not delivering the number of units identified and contributing to the failure of the plan to meet housing requirement.</p> <p><i>For the reasons explained above, amend the policy to identify that the requirement relates to schemes of 500 units or more.</i></p>	Noted	No change
23248 - Mid and South Essex STP (Kerry Harding) [3791]	Support	We are pleased to note that the policies within the LP support our health and wellbeing objectives.	Support welcomed.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY BE21: PROTECTING LAND FOR GARDENS</i></b>				
23817 - Sow & Grow Nursery (Mr. Derek Armiger) [303] 23844 - Sow & Grow Nursery (Ms Kim Armiger) [4657] 23861 - Ms Maxine Armiger [4656]	Object	It is understood that Policy BE21 will only apply to garden land not forming part of an allocated site for development. If it is considered by the Examiner that as drafted BE21 is not clear, then it is requested that there is a clarification by way of an explanatory paragraph to exclude the application of Policy BE21 to parts of sites in garden land use, such as identified in Policy R07. Likewise para. 5.174 refers to the NPPF 2018 and the exclusion of gardens from the definition of previously developed land. However Annex 2 Glossary to the NPPF 2018 states with regard to previously developed land, land that is excluded includes: "land in built-up areas such as residential gardens, parks .. ". As land in site R07 includes residential garden land to the Bungalow and dwelling at Sow N Grow Nursery, and also to the adjoining 346 Ongar Road, which is currently outside the development/settlement boundary and in the countryside/green belt, it will be previously developed land. When it is brought into the settlement boundary and out of the green belt upon adoption there may be a need to clarify the application of this explanatory paragraph which forms part of the emerging Local Plan; as referred to above.  <i>Clarify policy BE21 with regard to site R07.</i>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>5.174</i>				
23818 - Sow & Grow Nursery (Mr. Derek Armiger) [303] 23843 - Sow & Grow Nursery (Ms Kim Armiger) [4657] 23860 - Ms Maxine Armiger [4656]	Object	As land in site R07 includes residential garden land to the Bungalow and dwelling at Sow N Grow Nursery, and also to 346 Ongar Road, which is currently outside the development/settlement boundary and in the countryside/green belt, it will be previously developed land. When it is brought into the settlement boundary and out of the green belt upon adoption there may be a need to clarify the application of this explanatory paragraph which forms part of the emerging Local Plan; as referred to above. There should be a further clarification to para. 5.174 to exclude gardens outside built up areas to accord with the definition in the NPPF 2018, and to provide certainty where part of allocated development sites which become part of built up areas.  <i>Amend para 5.174 to exclude gardens outside the built up area</i>	Noted.	No change.
<i>Open Space</i>				
22422 - MR Graham Clegg [5485]	Support	The green open space lying between the Baytree Centre and Coptfold Road is worth special attention.	Noted.	No further action.
<i>5.179</i>				
22311 - Essex Bridleways Association (Mrs Sue Dobson) [3855]	Object	Para 5.179 and Policy BE22: we note the requirement for access to open space, but we would prefer to see the aspiration to include more user groups within this open space both within the Policy and its reasoned justification.  <i>To make this Plan sound we suggest that a requirement to enhance existing open space and create new where possible and to ensure that as far as practicable this becomes accessible to all user groups.</i>	Noted.	Consider slight wording change to Policy BE22 section D to include wording on ensuring open spaces within the borough are inclusive and accessible.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY BE22: OPEN SPACE IN NEW DEVELOPMENT</i></b>				
24114 - Kelvedon Hatch Village Hall Charitable Trust [4558]	Object	<p>Allocation of Kelvedon Hatch Village Hall Charitable Trust's Property as a Protected Urban Open Space (PUOS): Unclear what criteria, policy or process determines the allocation of properties as a PUOS and what considerations are given for such allocations. The property is a Village Hall, not a playing field nor does it serve as a football pitch, mini football pitch and playground as described in the 'Sport, Leisure and Open Space Assessment' 2016. If planning allocations are retrospectively placed on the community's property, without the community's consent, the Trustees are under an obligation to challenge that.</p> <p>- <i>The allocation of the Trust's property (Kelvedon Hatch Village Hall) as a PUOS is not needed and should be removed. BBC had enough capacity to deliver its policies and responsibilities without the use of the Charitable Trust's property. Before any loss of control of the property , including sale or lease, the Community must hold a referendum, if the outcome is an agreement to loose control of all or part of the property this must be ratified by the Charity Commission.</i></p> <p>- <i>Allocate Kelvedon Hatch Village Hall as PC14, as this better describes the property.</i></p> <p>- <i>If this is not possible to remove the PUOS and replace it with PC14 please could all the reasons be fully itemised, i.e. how the community benefits from loss of their legal rights to determine how best to provide and maintain their village hall.</i></p>	Noted	None

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23886 - Redrow Homes [6669]	Object	<p>Although it is noted that the sentence includes the phrase 'where appropriate' it is considered that the policy should make clear that the contributions will go towards facilities that are directly related to the development proposal to mitigate the impacts rising. It would not, for example, be appropriate or consistent with national policy if the contributions were for the improvement of play facilities that the residents of a proposed residential scheme would be unlikely - through proximity - to utilise or have an impact upon.</p> <p><i>Amend criterion A to make it clear that the financial contributions will relate to facilities that are directly related to the development proposals and the impacts arising.</i></p>	Noted.	None

## POLICY BE22: OPEN SPACE IN NEW DEVELOPMENT

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23963 - CEG Land Promotions Limited [5050]	Object	<p>The NPPF states at paragraph 56 that planning obligations must only be sought where they meet all of the following tests:</p> <ul style="list-style-type: none"> <li>a) necessary to make the development acceptable in planning terms;</li> <li>b) directly related to the development; and</li> <li>c) fairly and reasonably related in scale and kind to the development.</li> </ul> <p>Policy BE22 is not positively prepared or consistent with paragraph 56 of the NPPF because it is not reasonable to request financial contributions in circumstances where a developer is providing functional open space on-site. To ensure the policy is positively prepared consistent with the NPPF modifications are proposed in our response to question no. 6.</p> <p><i>Policy BE22 is not positively prepared or consistent with paragraph 56 of the NPPF because it is not reasonable to request financial contributions in circumstances where a developer is providing functional open space on-site. To ensure the policy is positively prepared consistent with the NPPF modifications are proposed as follows:</i></p> <p><i>"A. New development proposals are expected to provide functional on-site open space and/or recreational amenities or, where it is demonstrated that this is not possible, and may, where appropriate be required to also provide a financial contribution in lieu towards new or improved facilities within the borough."</i></p>	Noted.	None

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24293 - Strutt & Parker LLP (Mr. Andy Butcher) [2741] 24320 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Object	<p>The policy is broadly supported. As can be seen from the Vision document that accompanies these representations, our proposed scheme for R24 makes provision for such space. It is nevertheless questionable whether it is necessary for all open space to be fully equipped (D.). The need for equipped space should also be related to the amount of development proposed and/or availability or local equipped areas. As a consequence, it is recommended that criteria D is amended to be refined to provide clarity on when equipped open space is required eg. on sites over 50 homes.</p> <p><i>It is recommended that criteria D is amended to be refined to provide clarity on when equipped open space is required eg. on sites over 50 homes.</i></p>	Noted.	None.
22373 - Sport England (Mr. Roy Warren) [4294] 24037 - Croudace Strategic Ltd [2656]	Support	<p>The Council's Open Space Standards seek proposals which meet the Fields in Trust (Guidance for Outdoor Play Space: Beyond the Six Acre Standard) minimum standards. The FiT standards relate to provision on the basis of hectares per 1,000 population generated. The Council's Open Space Standards are considered to be effective as they are based on FiT standards and are therefore "justified" and the policy is sound.</p>	Support welcomed.	No further action.



## POLICY BE23: OPEN SPACE, SPORT AND RECREATIONAL FACILITIES

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY BE23: OPEN SPACE, SPORT AND RECREATIONAL FACILITIES</i></b>				
22375 - Sport England (Mr. Roy Warren) [4294]	Object	<p>While the policy is welcomed in principle, there are the following concerns:</p> <ul style="list-style-type: none"> <li>* Criterion B requires development to accord with the Council's open space standards which would include a standard for outdoor sport despite the Council's evidence base recommending an alternative approach;</li> <li>* Criterion D only partly accords with Government policy as it does not make provision for alternative facilities to be at least equivalent or better in quantity. Furthermore, it does not allow the principle of loss of facilities where the proposal is for new open space/sports/recreation facilities where the benefits outweigh the impact.</li> </ul> <p><i>To address these objections, it is requested that policy BE23 be amended as follows:</i></p> <ul style="list-style-type: none"> <li>* <i>Criterion B is amended to require new development to make provision for outdoor sport in accordance with the approach proposed in the Council's Playing Pitch Strategy and the reasoned justification to the policy provides more detail of this approach including how more detailed guidance will be provided of how it will operate in practice i.e. through the IDP, Planning Obligations SPD etc. There will be a consequent requirement to remove the outdoor sport standard from Figure 5.4.</i></li> <li>* <i>Criterion D is amended to replace reference to "equal or better quality and convenience" with "equal or better, quantity, quality and convenience". An addition is made to the criterion to allow for the principle of the loss of facilities where the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. The criterion may need to be restructured to facilitate this.</i></li> </ul>	Noted.	Consider editing part B to require new development to make provision for outdoor sport in accordance with the approach proposed in the Council's Playing Pitch Strategy; and part D is amended to replace reference to "equal or better quality and convenience" with "equal or better, quantity, quality and convenience".

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23732 - JTS Partnership LLP (Mr. James Govier) [2587]	Object	<p>Policy BE23 states that permission will not be granted for development of land allocated on the Brentwood Policies Map as Protected Urban Open Space (PUOS) or Local Green Space... Site ID:19b scores low on the three criteria which Protected Urban Open Space is assessed against. Previous representations have been made identifying why this site should be removed from PUOS. This designation should be lifted from this site and consideration given for it to be developed.</p> <p><i>Publication of the Policies Proposals Map to enable it to be consulted upon and to provide context to the references to it within the draft Submission Plan.</i></p>	Noted.	None
23705 - Ms Heather Dunbar [8337] 24038 - Croudace Strategic Ltd [2656]	Object	<p>Policy BE23: Open Space, Sport and Recreational Facilities states that permissions will not be granted for the development of designated Protected Urban Open Space or Local Green Space unless it can be demonstrated that alternative and improved provision can be created, existing open space enhanced or no additional displacement within the Green Belt caused. As with Policy BE22, where appropriate all proposals will be required to comply with the Council's Open Space Standards which aim to meet those set out by FiT. It is therefore considered that policy BE22 is "justified" in line with national guidance and therefore sound.</p>	Support welcomed.	No further action.
<i>5.184</i>				
22312 - Essex Bridleways Association (Mrs Sue Dobson) [3855]	Object	<p>Para 5.184 mentions the need for connectivity between open areas of informal recreation via the rights of way network and this is of course welcomed; however, much of the good multi-user provision is fragmented and not connected, and Policy BE23 should contain an aspiration to enhance the links for all user groups to Brentwood's considerable amount of public open space.</p> <p><i>To make this Plan sound, we suggest that this Policy contains an aspiration to link its open spaces by enhancing the public rights of way network and upgrading them to enable their use by more user groups eg cyclists and equestrians.</i></p>	Noted.	None

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>Chapter 6. Housing Provision</b>				
<i>Housing</i>				
22239 - Mr Anthony Cross [4376] 22527 - Holmes & Hills LLP (Mr Michael Harman) [8074]	Object	<p>Inclusion of site allocations R25 and R26 in the LDP are inappropriate, unsound and not compliant with legal requirements on the following grounds: failure to prove that more suitable (brownfield) sites do not exist in the borough, or that other site allocations couldn't absorb the 70 dwellings proposed. If alternative brownfield sites do not exist then the council should increase the density of other allocated sites; inadequate consultation with EFDC and failure to properly consider the impact of other nearby developments on Blackmore; failure to recognise the increased flood risk resulting from the proposed development; adverse impact on roads, noise levels and safety of existing road users from increased traffic; inadequate local amenities/services; other considerations per full representation.</p> <p><i>Removal of proposed developments R25 and R26 from the plan and reallocation of the 70 dwellings to more suitable brownfield sites in the borough.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23873 - Ms. Isobel McGeever [7286]	Object	<p>The PSLDP aims to deliver 7,752 over the Plan period, averaging 456 dpa. The minimum housing requirement for BBC is 452 dpa. Taking into consideration some of the neighbouring authorities unmet housing need - Basildon 3,508 and Havering 5,650 - the Council should consider contributing to their housing needs through outlining and planning for a higher housing target. The Council should also consider the arrival of Crossrail, which is set to unlock further demand for housing in the area. The Councils approach to a stepped trajectory is also not justified, and should look to deliver housing in the short term.</p> <p><i>Should any part of the Brentwood Community Hospital site be declared as surplus to the operational healthcare requirement of the NHS in the future, then the site should be considered suitable and available for alternative use, and considered deliverable within the period 5-10 years. These representations identify the sites potential for future development, in accordance with the realignment of the Green Belt so that this significant area of development land is no longer included. It is evident, that the site does not make a positive contribution towards the purposes of the Green Belt set out in the NPPF. Accordingly, redevelopment of the site could provide a key contribution to Brentwood's housing need, which the Council have failed to justify, given the reliance on key strategic sites, and the lack of acknowledgement for unmet need arising from neighbouring authorities (Basildon and Havering). These representations therefore promote and identify parts of the Brentwood Community Hospital site as a suitable site to contribute towards these requirements. This site presents an excellent opportunity for a high quality residential redevelopment on previously developed Green Belt land. This could be achieved without compromising the character of the area as the development can act as an infill site to the existing residential development surrounding it, and without the need for significant infrastructure. Furthermore, the site is also available to accommodate further health related development should the CCG seek to expand their services in this location, including the possible expansion of the hospital to provide more comprehensive services for the community. However, the site's Green Belt designation would make it</i></p>	Noted.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>difficult for any planning application proposing additional built form to provide further healthcare services to be considered acceptable. The subject site is considered available, suitable and deliverable within the 5-10 year period of the plan.</i>		
23119 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>The Council questions whether the Spatial Strategy is therefore justified and consistent with national policy. The two transport corridors dont offer comparable choices in terms of the capacity of these transport connections. Four reasonable site alternatives in the Central Brentwood Corridor have been disregarded in the Sustainability Apprial, despite having few constraints and being able to tap into the potential for movement capacity. This is considered to be in conflict with sustainable development when sites which have significant constraints to development or delivery have been included within the Plan, at the expense of sites which have fewer constraints.</p> <p><i>Using the Sustainability Appraisal and other evidence, the Plan should select sites within the Central Brentwood Growth Corridor that provide opportunity for extensions to towns and villages that can encourage more sustainable travel choices and take advantage of the superior infrastructure available. This should help encourage commuting behaviour to shift away from private car use and therefore make this location a more sustainable and viable option to concentrate growth. Chapter 3 should be modified as a result along with all land use allocations in Chapter 6 and Chapter 7.</i></p>	The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23664 - Gladman Developments [2774]	Object	A local planning authority must identify its housing needs, these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, resulting in net gains across all three. Adverse impacts on any of these dimensions should be avoided, where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed or, where this is not possible, compensatory measures should be considered. To be considered sound at Examination the emerging Local Plan will need to meet all four of the soundness tests set out in paragraph 35 of the Revised Framework (2019).	Noted. The Council intend to meet its objectively assessed needs as identified in Policy SP02: Managing Growth	No change
23307 - Greater London Authority (Mr Jörn Peters) [6093]	Support	We welcome the Council's strategic longer-term approach to housing supply. Your target accommodates a 'buffer' on top of the housing need based on the Government's standardised methodology. It should be noted that our latest demographic modelling provides alternative population and household projections that could also be taken into account when applying the standardised approach. Our projections include consistent outputs for all local authorities in England and form the basis for housing need in the draft new London Plan. They are available on the London Datastore: <a href="https://data.london.gov.uk/dataset/projections">https://data.london.gov.uk/dataset/projections</a> .	Support Welcomed	No further action required.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY HP01: HOUSING MIX</i></b>				
23133 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>The DHGV is within close proximity with Basildon &amp; Thurrock Boroughs and it is considered that there may be implications for the future geographical extent of both the Brentwood and South Essex Housing Market Areas as the housing markets evolve. The attached table has been prepared using Figure 6.1 from the Plan and the South Essex Strategic Housing Market Assessment that has informed the Basildon Borough Local Plan 2014-2034 and it is considered both these SHMA's should instead be used to inform the housing mix policy for DHGV.</p> <p><i>It is considered the stark contrast between the house size requirements for Basildon and Brentwood in DHGV, which is on a boundary location, means it needs to have taken into account the South Essex SHMA in determining the housing mix for DHGV so that it can better sit within the landscape of the strategic context of South Essex, which is not reflective of the wider Brentwood Borough HMA. Policy HP01 and R01 should be amended in light of this.</i></p>	<p>The spatial strategy as proposed includes justification for the site allocations, alternative/additional sites have been considered but have not been selected. The Council is of the view that DHGV can be delivered within the required timeframes as set out within the published trajectory. As part of the masterplan work, further information will be forthcoming on delivery of DHGV. There is a requirement in the NPPF to have a flexible supply of locations for new development to meet housing need (NPPF paragraph 68). This includes sufficient homes for the initial five years supply as well as sites of various sizes so they can be brought forward for development. The Council does not want to rely too heavily on one site to meet the borough's development needs.</p>	No Change.



<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23707 - Ms Heather Dunbar [8337] 23819 - Sow & Grow Nursery (Mr. Derek Armiger) [303] 23842 - Sow & Grow Nursery (Ms Kim Armiger) [4657] 23859 - Ms Maxine Armiger [4656]	Object	HP01B states: "Where a development site has been divided into parts, or is being delivered in phases, the area to be used for determining whether this policy applies will be the whole original site". Where an allocated site is in two or more separate ownerships and separated by a physical barrier or legal ownership, this criterion may be difficult to apply and could delay or halt development.it would be preferable that there should be a further clarification or explanatory paragraph to Policy HP01B to allow for smaller sites in separate ownerships, say under 1 hectare) to be excluded from the Policy. This would facilitate quicker delivery of such sites. It would also better accord with the NPPF 2018. (See para. 68 of the NPPF 2018, noting the Sow N Grow part of the site is less than 1 hectare (about 0.93 hectares) - in particular also para. 68a and the requirement for 10% delivery of sites of less than 1 hectare, with the further smaller separate parcel at 346 Ongar Road).  <i>Amend and clarify policy HP01B</i>	Noted.	None.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22558 - Gerald Downey [4671]	Object	<p>As referenced by Brandon Lewis MP in communication to Rt Hon Sir Eric Pickles MP (attached), the number of self-build plots allocated per site should be proportional to the local demand for self-build within Brentwood as noted on the local self-build register.</p> <p>A minimum of 5% self-build on development sites of 500 (N=3 sites in LDP) does not meet the demand for self-build in the local area.</p> <p>Note that the original Local Plan had 5% self-build on sites with more than 100 dwellings. Despite previous representations, the focus on self-build has been diluted in the latest LDP.</p> <p><i>To make the Local Plan sound and legally compliant, the necessary changes are to : 1) Require that a minimum of 5% self-build homes which can include custom housebuilding on "developments of 60 or more (net) dwellings". Given the expected demand for self-build (as referenced in point #67 of the 2011 Housing Strategy for England), I would propose that the minimum 5% self-build should also apply to developments of 60 or more dwellings. 2) "The inclusion of self-build and custom build homes and Specialist Residential Accommodation on smaller sites will also be encouraged". For this last sentence, provide stronger wording other than "encouraged". For example, including wording received in personal communication from the housing minister (attached), as presented below: "encouraged, with the number of self-build plots allocated per site proportional to the local demand for self-build within Brentwood as noted on the local self-build register". Suggest to also reference "The Self-Build and Custom Housebuilding Act 2015".</i></p>	Noted.	Include reference to The Self-Build and Custom Housebuilding Act 2015 (as amended).

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24129 - Ford Motor Company (Mr Clive Page) [3769]	Object	<p>Ford supports the intentions of Draft Policy HP01 in seeking to ensure that residential development proposals deliver housing in a way that contributes to the rebalancing of the housing stock; ensuring it reflects the recognised needs of existing and future communities. This includes providing a mix of dwelling types, sizes and tenures, relevant to the context of each site. our Client notes that the threshold for requiring a minimum of 5% selfbuild homes (which can include custom housebuilding and provision for specialist accommodation) is set at 500 or more dwellings. However, this threshold does not appear to have been applied to Draft allocations RO4 and RO5, which includes a requirement for both custom build housing and specialist accommodation across the wider allocation, despite having a total housing yield of 473 units across the Draft allocation - i.e. under the 500-unit threshold. Accordingly, our Client urges BBC to review this and requests that Draft allocation RO4 and RO5 is revised to remove this requirement based on the threshold set under Draft Policy HP01. At present, it is considered that there is a lack of evidence to justify this policy position, rendering the PSD unsound on this basis.</p> <p><i>review the self-build requirements and requests that Draft allocation RO4 and RO5 is revised to remove this requirement based on the threshold set under Draft Policy HP01. At present, it is considered that there is a lack of evidence to justify this policy position, rendering the PSD unsound on this basis.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23964 - CEG Land Promotions Limited [5050]	Object	<p>Self-build and/or custom build housing is supported by the National Planning Policy Framework (NPPF) and its contribution can help to diversify a housing offer, thus supporting housing delivery overall (Letwin, October 2018). CEG is committed to the delivery of self and custom build housing at Dunton Hills Garden Village (DHGV). 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% set out in criterion A. c. (i) is not justified by an appropriate evidence base. CEG is aware that the current level of interest on the Council's Self and Custom Build Register is relatively limited and the need for such housing does not, therefore, justify a minimum level of 5% being required. Indeed, if such a level isn't needed setting such a high minimum requirement could effectively prevent land being released for other types of housing which are needed.</p> <p>In the 12 month period ending in October 2018 it is understood that 47 individuals and no associations were registered with the Council. Of the total number, 9 indicated a preference for village locations across the Borough, which in the future might include DHGV. It is acknowledged that the Register is relatively new and the need for this type of housing might change over time. Considering this, a lower minimum requirement should be sought, probably at 1%, to support this type of housing at a level proportionate to the likely need. DHGV will provide for 2,700 new homes over the plan period, and 1% of this would amount to 27 self-build homes in total.</p> <p>Overall CEG considers the 5% is too high and a lower figure should be adopted.</p> <p><i>To ensure the policy is positively prepared and justified the following modification is proposed: "c. i. a minimum of 5 1% self-build homes which can include some custom housebuilding;..."</i></p>	Noted.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23681 - Gladman Developments [2774]	Object	<p>HP01 contains a number of development requirements which would be applied to all new development including housing mix, accessible and adaptable dwellings and self and custom build homes. This should be done in line with Revised Framework 46 and must be justified and evidences. Disagree with requirement to Part M Category 1, 2 or 3 standards and inclusion of self/custom build on large scale plots given issues around working hours, site access, health and safety etc. that are associated with large scale development sites.</p> <p><i>Remove the Building Regulation Part M Category and self/custom build requirements from the plan</i></p>	Noted.	No change.
23686 - Clearbrook Group Plc [2930]	Object	<p>Policy HP01 requires each dwelling to be constructed to meet M4(2) accessible and adaptable standards, with 5% of dwellings to be M4(3) on schemes of 60 or more. Where other Councils have sought to require all dwellings to meet M4(2) there have been multiple objections due to viability implications, with the requirement generally being significantly reduced. We are therefore concerned that the actual amount of housing meeting accessible and adaptable, and wheelchair user standards will be significantly below this level.</p> <p><i>Allocate deliverable sites to meet the diverse needs of older people. Such sites should include those that can come forward in the early part of the plan period to meet immediate needs, and should be distributed across the Borough.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24001 - CALA Homes [5237] 24039 - Croudace Strategic Ltd [2656]	Object	<p>The Council has failed to demonstrate that the requirement in paragraph A (a)(ii) of the policy for every dwelling built on all residential developments of 10 or more dwellings to be constructed to meet requirement M4(2) accessible and adaptable dwellings, unless they are built in line with M4(3) wheelchair adaptable dwelling standard, is actually justified in terms of either need or viability. The policy fails to adequately reflect dispensations from these housing requirements in respect of specific types of residential development. The Council should be fully committed to ensuring that the housing mix policy will be implemented in a flexible manner, and not seek to apply a 'one size fits all' approach to all sites across the Borough. The supporting text refers to DCLG research which shows that, nearly 30% of households have at least one person with a long-term illness and over 3% have one or more wheelchair user. This need for "all developments" to meet this target is not set out in the evidence or in the NPPG.</p> <p><i>Policy HP01 should be provide greater flexibility and reflect the fact that the policy requirements should not be so rigid. The following amendments are proposed to the text of Policy HP01: A. All new development should deliver an inclusive, accessible environment throughout. a. On residential development proposals of 10 or more (net) additional dwellings the Council will seek: i. an appropriate mix of dwelling types, sizes and tenures to take account of meet the identified housing needs in the borough as set out in the Strategic Housing Market Assessment or any similar evidence for market and affordable units (such as the Council's Housing Strategy, AMR and localised market information), to provide choice, and contribute towards the creation of sustainable, balanced and inclusive communities; and b. On developments of 60 or more (net) dwellings the Council will seek the above, and: i. a minimum of 5% of new affordable dwellings should be built to meet requirement M4(3) wheelchair accessible dwellings of the Building. Regulations 2015, or subsequent government standard. c. On development sites of 500 or more dwellings the Council will seek all of the above, and: i. a minimum of 5% self-build homes which can include custom housebuilding; and ii. provision for Specialist Accommodation taking account of local housing need</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p><i>in accordance with the criteria set out in Policy HP04. Specialist Accommodation. B. Where a development site has been divided into parts, or is being delivered in phases, the area to be used for determining whether this policy applies will be the whole original site. C. The inclusion of self-build and custom build homes and Specialist Residential Accommodation on smaller sites will also be encouraged. The following amendments are proposed to the supporting text of Policy HP01: 6.4 The Council's Strategic Housing Market Assessment (SHMA) Part 2 (2016) provides a detailed assessment of the housing required to meet existing and future needs across the borough. Proposals should respond to other up-to-date and relevant local evidence where available, such as the Council's Housing Strategy, AMR and more localised market information.</i></p>		
22356 - Rochford District Council (Planning Policy) [4178]	Support	The Council is broadly supportive of the provisions of policy HP01 and does not have any specific concerns around its soundness or legal compliance.	Support Welcomed	No further action required
24294 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The Council's approach to providing for an appropriate mix of dwelling types is generally supported. However, the Policy as set out refers to the Borough wide requirements in the Strategic Housing Market Assessment (SHMA) and does not necessarily take into account a local area or sub area within the Borough. It is important to note that the SHMA requirements, at Figure 6.1, confirms that it is an indicative mix guide for market housing. It is also noted that para 6.5 confirms that the final mix will be subject to negotiation. This is welcomed on the basis that some flexibility will be necessary in certain circumstances as part of the planning application process. We are aware of the representations submitted by HBF regarding accessible homes and justification. We support those views. It is questionable whether it is necessary for the PSLP to set out in planning policy the requirements of Building Regulations.</p> <p><i>It is suggested that para 6.5 should provide greater clarity and a minor change confirming that the final mix will be subject to negotiation "as part of a planning application" rather than "with the applicant".</i></p>	Support Welcomed	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23249 - Mid and South Essex STP (Kerry Harding) [3791]	Support	We are pleased to note that the policies within the LP support our health and wellbeing objectives.	Supported Welcomed	No further action required
24321 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The Council's approach to providing for an appropriate mix of dwelling types is generally supported. However, the Policy as set out refers to the Borough wide requirements in the Strategic Housing Market Assessment (SHMA) and does not necessarily take into account a local area or sub area within the Borough. It is important to note that the SHMA requirements, at Figure 6.1, confirms that it is an indicative mix guide for market housing. It is also noted that para 6.5 confirms that the final mix will be subject to negotiation. This is welcomed on the basis that some flexibility will be necessary in certain circumstances as part of the planning application process. We are aware of the representations submitted by HBF regarding accessible homes and justification. We support those views. It is questionable whether it is necessary for the PSLP to set out in planning policy the requirements of Building Regulations.</p> <p><i>It is suggested that para 6.5 should provide greater clarity and a minor change confirming that the final mix will be subject to negotiation "as part of a planning application" rather than "with the applicant".</i></p>	Support Welcomed.	No change



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>6.5</b>				
24295 - Strutt & Parker LLP (Mr. Andy Butcher) [2741] 24322 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The Council's approach to providing for an appropriate mix of dwelling types is generally supported. However, the Policy as set out refers to the Borough wide requirements in the Strategic Housing Market Assessment (SHMA) and does not necessarily take into account a local area or sub area within the Borough. It is important to note that the SHMA requirements, at Figure 6.1, confirms that it is an indicative mix guide for market housing. It is also noted that para 6.5 confirms that the final mix will be subject to negotiation. This is welcomed on the basis that some flexibility will be necessary in certain circumstances as part of the planning application process. We are aware of the representations submitted by HBF regarding accessible homes and justification. We support those views. It is questionable whether it is necessary for the PSLP to set out in planning policy the requirements of Building Regulations.</p> <p><i>It is suggested that para 6.5 should provide greater clarity and a minor change confirming that the final mix will be subject to negotiation "as part of a planning application" rather than "with the applicant".</i></p>	Support Welcomed	No change

Figure 6.1: Indicative Size Guide for Market Housing

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
<i>Figure 6.1: Indicative Size Guide for Market Housing</i>				
24296 - Strutt & Parker LLP (Mr. Andy Butcher) [2741] 24323 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The Council's approach to providing for an appropriate mix of dwelling types is generally supported. However, the Policy as set out refers to the Borough wide requirements in the Strategic Housing Market Assessment (SHMA) and does not necessarily take into account a local area or sub area within the Borough. It is important to note that the SHMA requirements, at Figure 6.1, confirms that it is an indicative mix guide for market housing. It is also noted that para 6.5 confirms that the final mix will be subject to negotiation. This is welcomed on the basis that some flexibility will be necessary in certain circumstances as part of the planning application process. We are aware of the representations submitted by HBF regarding accessible homes and justification. We support those views. It is questionable whether it is necessary for the PSLP to set out in planning policy the requirements of Building Regulations.</p> <p><i>It is suggested that para 6.5 should provide greater clarity and a minor change confirming that the final mix will be subject to negotiation "as part of a planning application" rather than "with the applicant".</i></p>	Support Welcomed	No change
<i>POLICY HP03: RESIDENTIAL DENSITY</i>				
23965 - CEG Land Promotions Limited [5050]	Object	<p>The policy is positively prepared. Taking a design led approach to density should enable development to achieve a net density of at least 35 dph or higher. This approach is consistent with Chapter 11 of the NPPF which seeks to make efficient use of land and optimise the density of development. A modification is proposed to reflect that density across a site should be an average.</p> <p><i>Policy HP03, Residential Density (page 128). A modification is proposed to reflect that the density should be an average across a site, recognising that on large strategic sites a range of densities might be appropriate. This would ensure the policy is positively prepared. "B. Residential development proposals will generally be expected to achieve an average net density of at least 35 dwellings per hectare or higher..."</i></p>	Noted.	No change.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23905 - Crest Nicholson Eastern [2509]	Support	This policy seeks to define appropriate residential development densities with the caveat that individual schemes should employ a design-led approach to determine an appropriate, site-specific density. Generally, a density of 35 dwellings per hectare or higher will be sought on sites outside of town centres, district shopping centres and local centres. We consider that adopting standards such as this is appropriate, because it would ensure that land is used as efficiently as possible, in accordance with NPPF paragraph 123.	Support Welcomed	No further action required
24324 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	We support the PSLP's approach to residential density as set out in Policy HP03. This is considered to be justified based on the evidence and consistent with the national policy. As far as our client's land interests are concerned at R23 and R24, both sites are capable of providing an increased density to that expressed for the relevant policies R23 and R24. However, part B of the policy quite properly acknowledges that a chosen density should take into account the character of the surrounding area and other site constraints. This is supported.	Support Welcomed	No further action required
24040 - Croudace Strategic Ltd [2656]	Support	Policy HP03: Residential Density sets out that residential development proposals will generally be expected to achieve a net density of at least 35 dwellings per hectare net or higher. Proposals for new residential development should take a design-led approach to density which ensures schemes are sympathetic to local character and make efficient use of land. Proposals for housing developments should "Make an Effective Use of Land" in line with NPPF (Section 11). This policy is therefore "consistent" with the NPPF and sound, but must provide for a degree of flexibility to allow for local circumstances.	Support Welcomed	No further action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24297 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	We support the PSLP's approach to residential density as set out in Policy HP03. This is considered to be justified based on the evidence and consistent with the national policy. As far as our client's land interests are concerned at R23 and R24, both sites are capable of providing an increased density to that expressed for the relevant policies R23 and R24. However, part B of the policy quite properly acknowledges that a chosen density should take into account the character of the surrounding area and other site constraints. This is supported.	Support Welcomed	No further action required
24130 - Ford Motor Company (Mr Clive Page) [3769]	Support	Ford welcomes Draft Policy HP03, which aims to ensure efficient use of the boroughs land whilst promoting a design-led approach to density which ensures schemes are sympathetic to local character and context. The supporting text states efficient land use is essential in a borough like Brentwood where land is scarce and enables new homes to be provided without encroaching on the countryside. This stresses the importance of delivering new housing on previously developed sites.	Support Welcomed	No further action required
25695 - MRS LESLEY LYNN [5591]	Support	I am writing to you to object to the density of housing Brentwood Council is proposing on the office site in Western Road which equates to something like 229 dwellings per Hectare, which is far the biggest of any of the proposed sites and can only possibly be achieved with high rise blocks of flats, which is inappropriate in a residential street of houses with a maximum height of two and a half stories. Development of this site contradicts policy HP03 in regards to population density	Support Welcomed	No further action required
<b>6.21</b>				
22184 - Mr DAVID FISHER [8184]	Object	I do not agree that one specific area of Hutton & Shenfield should be singled out to preserve density, one could argue the same rule could be applied to other leafy streets, not listed here. Any new or in-filling should be judged on it's merits of surrounding area, not by postcode.  <i>Remove exception</i>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22221 - Dr Philip Gibbs [4309]	Object	<p>The housing strategy aims to reduce density in Hutton Mount rather than increase it as required by national policy.</p> <p><i>remove paragraph 6.21</i></p>	Noted.	No change.
<i>Specialist Accommodation</i>				
23680 - M Scott Properties Ltd [8054] 23687 - Clearbrook Group Plc [2930] 24169 - Turn2us [6753]	Object	<p>There is an acute need for specialist accommodation to meet the needs of an ageing population, which the Plan proposes to provide for through care homes on strategic allocations and Policy HP04 - such as DHGV, however no indication of the size or type is given so it's unclear whether this will be another care home or a different form of accommodation. The proposed care homes on strategic allocations will provide in total 180 beds of C2 accommodation, falling significantly short of the identified requirement for 494 additional units; whereas policy HP04 is not clear as to how much specialist accommodation, where, or how it is delivered. A more wholistic and supportive approach towards elder population's housing needs will be required. In the absence of an assessment of need, it is unclear if this will meet need in quantitative terms. In addition, all of these are strategic allocations, and will inevitably be relatively long lead-in times to delivery.</p> <p><i>Allocate deliverable sites to meet the diverse needs of older people. Such sites should include those that can come forward in the early part of the plan period to meet immediate needs, and should be distributed across the Borough to meet local needs and allow people to remain within their existing communities if they wish.</i></p>	Noted.	No change.
<i>POLICY HP04: SPECIALIST ACCOMMODATION</i>				
23385 - BJ Associates [8317]	Object	<p>The Draft Plan acknowledges the aging population but fails to plan for any increase in accommodation. In effect policy HP04 creates un-justified negative criteria against which to consider proposals. This approach is contrary to NPPF and NPPG guidance.</p> <p><i>Allocation of the Roman Road Site for Housing and or Specialist accommodation for older people.</i></p>	Noted.	No change.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23683 - M Scott Properties Ltd [8054] 23688 - Clearbrook Group Plc [2930]	Object	<p>The policy is not clear as to how much, where, or how specialist accommodation and independent living are expected to be delivered. It is difficult to see where a new site within the existing built up area will come forward for specialist accommodation, casting further doubts on the effectiveness of Policy HP04. The approach is neither positively prepared, consistent with national policy, nor effective.</p> <p><i>Allocate deliverable sites to meet ageing population's need and reflect the objectives set out in the Plan in relation to accommodation for older people as the Plan has already (presumably) exhausted the available sites outside of the Green Belt. Sites should include those that can come forward in the early part of the plan period to meet immediate needs, and should be distributed across the Borough to meet local needs and allow people to remain within their existing communities if they wish.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24136 - Ford Motor Company (Mr Clive Page) [3769]	Object	<p>Ford acknowledges that BBC are encouraging proposals to contribute to the delivery of Specialist Accommodation and are broadly supporting in terms of providing such facilities where there is a 'demonstratable established local community need'. Ford recognises that the SHMA Part 2 (2016) identifies that there is likely to be an additional need for 494 specialist units over the next 20 years, including 466 units as sheltered housing and 28 extracare units. Whilst Ford is supportive of BBC seeking to accommodate such facilities across the Borough, we note that there is currently a lack of evidence (including a detailed assessment of local community need) to fully justify accommodating such a use under Draft allocation RO4 and RO5, alongside residential. Indeed, we understand that that this requirement has only been included in response to a likely strategic-need for age friendly housing, but with no local analysis and/or basis to support this.</p> <p><i>Ford's commercial advisors CBRE have undertaken a recent analysis of local demand and supply within the surrounding Site area (Pulse Report) whereby this has identified that there is an oversupply of bed spaces across a variety of care spectrums (including a c.200 bed space oversupply within a 5-mile radius and c.1,000 within a 3 mile radius) - signifying a lack of need within the local area; whereby the Draft allocation would likely result in an un-viable future use (contrary to the parameters of sustainable development set out within the NPPF). As such, we would strongly urge BBC to revise the Draft allocation for the Site accordingly - recognising that it is most suitable for residential use only.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23675 - M Scott Properties Ltd [8054]	Object	<p>The Plan's broad definition of Specialist Accommodation, which include Gypsies and Travellers who no longer exercise a nomadic lifestyle, is potentially too broad to meet the needs for older people. The Plan does not, therefore, give an accurate representation of the type of accommodation the Plan is seeking to deliver and for what specific group(s).</p> <p><i>Release additional, suitable Green Belt sites in order to assist with the delivery of homes over the Plan period, including to meet the need for specialist housing.</i></p>	Noted.	No change.
23652 - Drs M. & Z. Sahirad [2118]	Object	<p>Proposal for site for new elderly persons residential home at Little Warley Hall Farm. Site not within 2019 Reg 19 local plan.</p> <p>Arguing need for facility and the special circumstances case (need, demographic, lack of alternative sites, delivery economics, highway improvement, additional community benefits, landscape and biodiversity enhancements).</p> <p><i>Add site to plan</i></p>	Noted.	No change.
24041 - Croudace Strategic Ltd [2656]	Support	<p>The Council's SHMA indicates that, if occupation patterns of Specialist Residential Accommodation for older people remain at current levels, there will be a requirement for 494 additional specialist units to 2033, aligning with the requirement in the Land North of Shenfield site allocation for provision of a residential care home (a 60-bed scheme as part of the overall allocation). This policy is also "consistent" with the NPPF section 5 (para 64 b) and is therefore considered to be sound.</p>	Support Welcomed	No further action required.
22357 - Rochford District Council (Planning Policy) [4178]	Support	<p>The Council acknowledges that demographic shifts and changing preferences are likely to increase the demand for specialist accommodation into the future, particularly forms of accommodation for older people.</p>	Support Welcomed	No further action required



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23427 - Dr Maria Faraone [8320]	Support	A robust and balanced vision for the future to ensure all of the community's needs are accounted for. The regular updating of a 'Specialist Accommodation Report' will help ensure this continues to be fair. Grouping elderly, disabled and the Gypsy and Traveller as specialist accommodation does well to ensure there is a considered and targeted approach without being exclusionary. The consideration for accommodation for those no longer travelling means that Brentwood is a leader in recognizing the true needs of all members of its community. Overall the Local Plan incorporates all the critical issues of environment, demographic changes, social and economic forecasting. This is an excellent Local Plan and represents what is hopefully a new trend for planning for local authorities in England.	Support Welcomed.	No further action required.

## 6.25

22391 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>ECC currently have 39 individuals in South of Essex who are waiting for Supported Living Scheme placements. In terms of housing, new potential builds for Supported Living could be beneficial to supply demand for this type of accommodation, and any specialist accommodation provision for people with disabilities and/or autism could meet the need of local population or individuals who would move to area. ECC are currently carrying out review of demand for adults with disabilities under Independent Living programme. Request additional paragraph to be inserted after paragraph 6.25 to ensure that full range of specialist accommodation is considered in line with NPPF paragraph 61.</p> <p><i>Insert the following paragraph after paragraph 6.25 -</i></p> <p><i>In terms of housing, new potential builds for Supported Living could be beneficial to supply demand for this type of accommodation, and any specialist accommodation provision for people with disabilities and /or autism could meet the need of the local population or individuals who would move to this area. The demand for adults with disabilities is considered under the Independent Living programme.</i></p>	Noted	Consider intersecting a para after 6.25: In terms of housing, new potential builds for Supported Living could be beneficial to supply demand for this type of accommodation, and any specialist accommodation provision for people with disabilities and /or autism could meet the need of the local population or individuals who would move to this area. The demand for adults with disabilities is considered under the Independent Living programme.
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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*POLICY HP05: AFFORDABLE HOUSING*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24004 - CALA Homes [5237]	Object	<p>Paragraph G. states that the requirement to provide affordable housing will apply to all C3 residential development with the exception of G&amp;T Pitches or Travelling Showman Plots. This is contrary to Paragraph 63 of the NPPF states that provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.</p> <p><i>The following amendments are proposed to the text of Policy HP05: A. The Council will seek require the provision of 35% of the total number of residential units to be provided and maintained as affordable housing within all new residential development sites on proposals of 11 or more (net) units or sites of 10 or less units which have a combined gross internal floorspace in excess of 1,000 square meters. B. In considering the suitability of affordable housing, the Council will seek that: 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 SHMA, AMR and localised market information; b. the affordable housing be designed in such a way as to be seamlessly integrated to that of market housing elements of a scheme (in terms of appearance, build quality and materials) and distributed throughout the development so as to avoid the over concentration in one area; and c. the type, mix, size and cost of affordable homes will reflect meet the identified housing need as reported by the Council's most up-to-date Strategic Housing Market Assessment, AMR, localised market information and Housing Strategy. C. In seeking affordable housing provision, the Council will have regard to scheme viability; only where robust viability evidence demonstrates that the full amount of affordable housing cannot be delivered, the Council will negotiate a level of on-site affordable housing that can be delivered taking into account the mix of unit size,</i></p>	Noted.	No change.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
		<p>type and tenure and any grant subsidy received. D. The Council will only accept a financial contribution in lieu of on-site provision where it can be satisfactorily demonstrated that on-site provision is neither feasible nor viable. E. Where a site has been sub-divided or is not being developed to its full potential so as to fall under the affordable housing threshold, the Council will seek a level of affordable housing to reflect the provision that would have been achieved on the site as a whole had it come forward as a single scheme for the allocated or identified site. F. Planning obligations will be used to ensure that the affordable housing will remain at an affordable price for future eligible households, or for the subsidy to be recycled to alternative affordable housing provision. G. In accordance with national policy, the requirement to provide affordable housing will apply to all qualifying residential development.</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24003 - CALA Homes [5237]	Object	<p>It is inappropriate in para B.(a) to require that the tenure split be made up of 86% Affordable/Social Rent and 14% as other forms of affordable housing (including starter homes, intermediate homes, shared ownership and all other forms of affordable housing).</p> <p><i>The following amendments are proposed to the text of Policy HP05: A. The Council will seek require the provision of 35% of the total number of residential units to be provided and maintained as affordable housing within all new residential development sites on proposals of 11 or more (net) units or sites of 10 or less units which have a combined gross internal floorspace in excess of 1,000 square meters. B. In considering the suitability of affordable housing, the Council will seek that: 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 SHMA, AMR and localised market information; b. the affordable housing be designed in such a way as to be seamlessly integrated to that of market housing elements of a scheme (in terms of appearance, build quality and materials) and distributed throughout the development so as to avoid the over concentration in one area; and c. the type, mix, size and cost of affordable homes will reflect meet the identified housing need as reported by the Council's most up-to-date Strategic Housing Market Assessment, AMR, localised market information and Housing Strategy. C. In seeking affordable housing provision, the Council will have regard to scheme viability; only where robust viability evidence demonstrates that the full amount of affordable housing cannot be delivered, the Council will negotiate a level of on-site affordable housing that can be delivered taking into account the mix of unit size, type and tenure and any grant subsidy received. D. The Council will only accept a financial contribution in lieu of on-site provision where it can be satisfactorily demonstrated that on-site provision is neither feasible nor viable. E. Where a site has been sub-divided or is not being developed to its full potential so as to fall under the affordable housing threshold, the Council will seek a level of affordable housing to reflect the</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p><i>provision that would have been achieved on the site as a whole had it come forward as a single scheme for the allocated or identified site. F. Planning obligations will be used to ensure that the affordable housing will remain at an affordable price for future eligible households, or for the subsidy to be recycled to alternative affordable housing provision. G. In accordance with national policy, the requirement to provide affordable housing will apply to all qualifying residential development.</i></p>		
24002 - CALA Homes [5237]	Object	<p>Support the policy's aim of seeking to deliver as much affordable housing as possible but wording set out in paragraphs A and B is too inflexible and fails to take adequate account of both viability and the fact that affordable housing requirements will inevitably change over the course of the Plan. It is inappropriate that the Council will require the provision of 35% of the total number of residential units to be affordable housing within major development.</p> <p><i>The amendments should include the deletion of references to 'require' and their replacement with 'see k' in order to provide greater flexibility and reflect the fact that the policy requirements should not be so rigid that they fail to take adequate.</i></p>	Noted.	No change.
23665 - Gladman Developments [2774]	Object	<p>Use of the NPPF standard methodology (Sept 2018) and Planning Policy Guidance para 005 (2a-005-20180913.) is needed to raise the level of homes in the plan. If it becomes clear that affordable housing need will not be delivered in full, then an increase to the total housing figures included in the plan should be considered where it could help to deliver the required number of the affordable homes.</p> <p><i>Amend to follow Para 2a-005-20180913 PPG</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24042 - Croudace Strategic Ltd [2656] 24298 - Strutt & Parker LLP (Mr. Andy Butcher) [2741] 24325 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Object	<p>We note that the SHMA provides justification for the affordable housing requirements. However, it is questionable whether the precise tenure/mix should be set out at B(a) of the Policy, given that requirements can change relatively quickly over time and the prescriptive approach may not take into account precise local needs. It is recommended that the criteria under B(a) should omit the reference to 86% and 14% proportions. It is suggested, in the alternative, that "the mix, size, type and cost of affordable homes will meet the identified housing needs of the Council's area and local needs as appropriate, established by housing need assessments including the SHMA". Viability is referred to, but the policy does not go far enough.</p> <p><i>It is recommended that the criteria under B(a) should omit the reference to 86% and 14% proportions. It is suggested, in the alternative, that "the mix, size, type and cost of affordable homes will meet the identified housing needs of the Council's area and local needs as appropriate, established by housing need assessments including the SHMA". Recommend that the policy includes a clause which requires a viability assessment to be submitted and considered whereby schemes are unable to meet the full affordable provision, which is not included at present. The policy is therefore "unjustified" and unsound.</i></p>	Noted.	No change.
24131 - Ford Motor Company (Mr Clive Page) [3769]	Support	<p>We fully appreciate that there is a significant need for affordable housing in Brentwood Borough, with 35% affordable applied to major residential schemes. Ford are aware that this level of affordable housing will likely be applied as part of any future planning application for the site, however this will be subject to scheme viability. BBC have recognised this approach, outlining that they will consider this where robust viability evidence demonstrates that the full amount of affordable housing cannot be delivered. This approach is welcomed by our Client and is considered to form a sound basis for negotiating affordable housing on a site-by-site basis (in line with NPPF Paragraph 62).</p>	Support Welcomed	No further action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23966 - CEG Land Promotions Limited [5050]	Support	<p>CEG supports the approach set out at paragraph 6.35 which explains that the 'need' for 86% social rent and 14% other forms of affordable housing will be used to inform negotiations between the Council and developers to determine the appropriate tenure and mix of affordable housing.</p> <p>This 'need' is then expressed as an 'indicative requirement' in Figure 6.2 and a 'requirement' in Policy HP05(B). The Policy currently requires a specific tenure split (86% social rent and 14% other forms of affordable housing) which may not be appropriate for the life of the Plan or for Strategic Allocations in the Plan. CEG supports the approach set out in paragraph 6.35 to ensure there is an appropriate amount of flexibility, for example, to accommodate changing circumstances over the lifetime of the Plan; and ensure the right mix and balance is created where Strategic Allocations are concerned.</p> <p><i>Modifications are proposed to ensure that the tenure split is guided, rather than dictated, by the SHMA. Modifications are proposed below to ensure the policy is positively prepared and consistent with the intention of the Plan as set out at paragraph 6.35. "B. In considering the suitability of affordable housing, the Council will require that: 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 other forms of affordable housing as described by national guidance or legislation) or having regard to the most up to date SHMA;" "B. c. the type, mix, size and cost of affordable homes must meet should have regard to the identified housing need as reported by the Council's most up-to-date Strategic Housing Market Assessment and Housing Strategy"</i></p>	Support Welcomed.	No change



<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22358 - Rochford District Council (Planning Policy) [4178]	Support	The Council acknowledges that affordability of housing is an acute and strategic issue for the whole of South Essex, including both Rochford and Brentwood, and considers that one of the primary objectives of the South Essex JSP should be to address the impacts that a lack of affordability is having on the health and vitality of the region, including by seeking to significantly increase the delivery of affordable housing across South Essex.	Support Welcomed	No further action required

#### ***POLICY HP06: STANDARDS FOR NEW HOUSING***

23888 - Redrow Homes [6669]	Object	<p>The NPPF and NPPG are clear that the space standards can be used where there is clear need for the standards to be applied. The supporting text of HP06 refers to the need being identified in the Council's AMR. But the AMR and other evidence document contain no such reference. No assessment has been undertaken regarding the implications of delivering these standards on development. Larger properties have the potential to reduce the yield and/or result in the loss of land required to meet other standards, i.e. on-site open space, and potentially lead to failure to meet housing needs.</p> <p><i>The Council must either delete the requirement to comply with the technical standards or else provide the evidence necessary to support the policy and demonstrate the implications for development densities. This evidence should be clearly referenced in the supporting text of the policy.</i></p>	Noted.	No change.
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23682 - Gladman Developments [2774]	Object	<p>If the Council wishes to adopt the NDSS as a policy requirement, then this should only be done in accordance with the Revised Framework footnote 46 i.e. where this would address an identified need for such properties and where the standards can be justified. The WMS dated 25th March 2015 stated that "the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG". We have been unable to locate where the evidence of a need for these standards is contained within the evidence base. Without this evidence, these requirements should be removed from the Local Plan.</p> <p><i>Remove Nationally Described Space Standards (NDDS) from the plan.</i></p>	Noted.	No change.
24043 - Croudace Strategic Ltd [2656]	Object	<p>The nationally described space standard is an appropriate tool to use when considering the provision of good housing. However, this should not be limited to major development, but should extend to all emerging residential development, whilst allowing for the consideration of local circumstances and site-specific conditions, in order to accord the NPPF (Section 12, Achieving Well-Designed Places). The policy is therefore "unjustified" in relation to need and viability (our emphasis) in accordance with the NPPF. The adoption of nationally described space standards is also at the discretion of the LPA and should be decided upon in a local context.</p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24005 - CALA Homes [5237]	Object	<p>The policy is not supported by detailed local evidence to support the imposition of the national space standard. Table 8.3 of the Local Plan Viability Assessment (October 2018) Additional Costs of Building to the draft Approved Document M amendments included at Appendix B4' identified costs based upon national 2014 prices, which are 5 years out of date. We further note the reference on p.102 of the Viability Assessment which states "through the September 2018 consultation some concern was expressed about the need for this policy. It is beyond the scope of this study to consider need"</p> <p><i>In the absence of any detailed local evidence to demonstrate the need for setting a local space standard, or evidence that it would be viable for developments of less than 500 dwellings, paragraph A of the policy should be deleted.</i></p>	Noted.	No change.
22322 - Anglian Water (Mr Stewart Patience) [6824]	Support	Policy HP06 welcomes the cross reference made to Policies BE02 Sustainable Construction and Resource Efficiency and BE08 Sustainable Drainage subject to our comments relating to these policies.	Support Welcomed	No further action required
<i>6.50</i>				
22393 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>The Essex Design Guide 2018 is an Essex Planning Officers' Association document, it was not prepared by Essex County Council. Paragraph 6.50 needs to be amended to ensure factual representation of the Essex Design Guide.</p> <p><i>Delete 'prepared by Essex County Council' from first sentence of paragraph 6.50.</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Gypsies, Travellers and Travelling Showpeople</i>				
23114 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>Objects to Paragraphs 6.52-6.62. Concerned that there is no acknowledgement in the supporting text as to how it will address any unmet needs arising from Greater Essex authorities for the provision of accommodation for Gypsies, Travellers &amp; Travelling Showpeople should it arise. The Plan should recognise and support the principle of this approach going forward, to ensure that there will be a technical approach in place to support any neighbouring authorities with any potential unmet Gypsy, Traveller and Travelling Showpeople need. This will ensure that the same process is applied throughout Essex making the plan more positively prepared and effective.</p> <p><i>The Essex Planning Officers' Association Protocol for Unmet Gypsy, Traveller and Travelling Showpeople Needs 2018 has been developed collaboratively across Essex under the Duty to Cooperate, including with Brentwood Borough Council. It should be referenced in the supporting text to Policy HP07 - within Paragraphs 6.52-6.62. This will help ensure that the Plan recognises and supports the principle of this approach going forward, underling the technical approach in place to support how any requests from neighbouring authorities with any potential unmet Gypsy, Traveller and Travelling will be considered in the future and then addressed as necessary through the Plan review process.</i></p>	Noted and agreed.	Consider referencing the Essex Planning Officers' Association Protocol for Unmet Gypsy, Traveller and Travelling Showpeople Needs 2018 in paras 6.52-6.62

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23115 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>Paragraphs 6.52-6.62: no mention of the strategic and cross-boundary matter of Transit Sites, for which there is a study underway during 2019/2020 by EPOA. Whilst the need for transit sites in Essex has not yet been robustly assessed due to data inconsistencies, an update to Essex Gypsy, Traveller and Travelling Showpeople Local Needs Accommodation Assessment will follow during 2019/2020. Whilst this cannot be included within Policy HE07 due to uncertainty, it is a current strategic matter for the DfC, and the Plan should indicate how any such needs identified in future updates to the GTAA will be dealt with.</p> <p><i>The Local Plan would be more effective and more consistent with the PPTS if the strategic, cross-boundary issue of transit sites, covered by the Duty to Cooperate were to be supported by a new paragraph explaining the context behind the issue and that it will be addressed as part of its first review.</i></p>	Noted	No change.
23177 - Chelmsford City Council (Ms Gemma Nicholson) [8305]	Support	On transit sites, CCC acknowledges the GTAA's recommendations to engage, through the Duty to Cooperate, with other Essex authorities in the future to review the need for transit sites. Further work on this is also being undertaken by Essex County Council to consider the need for these sites across Essex as a whole.	Support Welcomed	No further action required

## POLICY HP07: PROVISION FOR GYPSIES AND TRAVELLERS

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY HP07: PROVISION FOR GYPSIES AND TRAVELLERS</i></b>				
23109 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>The total requirement of Gypsy and Traveller pitches is 13 pitches (6 total current need and 6 total future need and a further 10% allowance for Gypsy and Traveller whose travelling status was recorded as being "unknown").</p> <p>Brentwood Council proposes to meet future needs through the regularisation of 8 existing pitches and 5 pitches towards future need. The Plan could be more effective by setting 6 pitches as the target for future need.</p> <p><i>The GTAA identified the need for an additional pitch to meet future needs and therefore whilst the Policy HP07 quotes a minimum of 5 new pitches to be provided within its minimum target, the Plan could be more effective by setting 6 pitches as the target.</i></p>	Noted.	No change.
23176 - Chelmsford City Council (Ms Gemma Nicholson) [8305]	Support	Is it noted that the Brentwood Gypsy and Traveller Accommodation Assessment (GTAA) identified that there is a requirement of 13 additional Gypsy and Traveller pitches to be developed by 2033. Overall, the need is being met with the authority's administrative area.	Support Welcomed	No further action required
22359 - Rochford District Council (Planning Policy) [4178]	Support	The Council supports Brentwood's commitment to meeting the identified accommodation needs for Gypsies and Travellers (meeting the PPTS definition) in full. Brentwood Borough Council should, however, satisfy itself and the Inspector that the proposed policy (and other relevant policies) would be deliverable at the site-level. Brentwood Borough Council should consider mechanisms for reviewing its policy approach if a shortfall in provision becomes evident through its monitoring, or to reflect any change in circumstances that arise through the development of a strategic approach as part of the emerging South Essex Joint Strategic Plan.	Support Welcomed	No further action required

## POLICY HP08: REGULARISING SUITABLE EXISTING TRAVELLER SITES

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY HP08: REGULARISING SUITABLE EXISTING TRAVELLER SITES</i></b>				
26102 - Mr James Hughes [8677]	Object	<p>I have experienced first-hand the failure of Brentwood Borough Council to exercise its duty to attempt to remove the Travellers from the site. I have sympathy obviously that the Travellers have had children who now attend the local school - but the very fact that they have been able to settle for that long just provides proof that they are no longer 'travelling'. Further proof has been sent to the Council in recent years of the fact that many 'Travellers' at that site actually own property elsewhere, which invalidates their 'Traveller' status. If this site is regularised, Brentwood is opening its doors to further illegal settlements.</p> <p><i>Due to issues I have made clear I believe it is the Council's duty to remove sites R25 and R26 from the LDP such that they do not overwhelm local amenities and services; such that they do not cause further flooding by removing crucial green spaces and such that they are not driving forward with plans that would adversely affect live in the surrounding areas. Blackmore is not an affordable area for young people trying to get on the 'property-ladder': so any attempt to provide affordable housing within that area is counter-intuitive.</i></p>	Noted.	No change.
23332 - Mr John Riley [4905] 24439 - Mrs Vicky Mumby [8378] 25260 - Mrs Margaret Laing [7046] 25289 - Mr John Laing [8501] 25848 - Mr John Hughes [4500] 25851 - Mr Thomas Hughes [8637] 25858 - Mrs Gail Hughes [8638] 25865 - Mr Adam Hughes [8639]	Object	<p>Policy HP08 seeks to regularise an illegal traveller site on the Chelmsford Road. The Borough Council has failed to undertake its duty to attempt to remove the travellers from the site since they first moved in some years ago. The Council have sat back and watched the site grow without taking any action and must re-visit this. In regularising the site the council is providing open invitation for other travellers to do the same as the council will be seen to be weak, capitulating and an easy target area.</p> <p><i>Remove the Blackmore travellers site from the plan.</i></p>	Noted.	No change.

## POLICY HP08: REGULARISING SUITABLE EXISTING TRAVELLER SITES

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25751 - Mrs Kay Parkinson [4599] 25752 - Mr Christopher Parkinson [8617]	Object	<p>A plan to regularize an unauthorized traveler site on the Chelmsford Road will add to further overcrowding in Blackmore village and an even greater pressure on all of its services.</p> <p><i>Sites R25 and R26 should be removed. Planners should refer to the BVHA 'neighbourhood plan'. This clearly sets out our local housing needs, and would avoid further development in the Blackmore area which is an already sustainable community.</i></p>	Noted.	No change.
25984 - Mr Colin Holbrook [4759] 25994 - Mrs Janice Holbrook [4700]	Object	<p>BBC (with significant support from Local Communities) went to great lengths a couple of years ago to prove the illegal occupation of the site in Chelmsford Road should not be allowed and the perpetrators should be removed. Now with no warning one individual raised the idea of formalizing the acceptability of the site, linking it to the LDP and it was passed without discussion at the infamous "Guillotine Meeting"</p> <p><i>Question 5 - bullets 1-3 * Due to the significant issues surrounding the acceptance of Reg 18 by BBC I think it would be necessary to independently reconsider the entire process to ensure that it was handled appropriately, and if not, repeat the process correctly before proceeding to Reg 19. Other bullets * New officials who understand the local issues and can make their voices heard with independence, in an environment that is willing to listen would be a prerequisite to getting any issues of this magnitude considered in a fair and democratic fashion. * Removing Blackmore from the List of Sites as previously promised or allocating the 70 houses to Dunton Hills, as already done for other sites.</i></p>	Noted.	No change.
24791 - Mrs Deborah Thwaite [8175]	Object	<p>Unauthorised travellers site will add to the impact on school, GP, local amenities in Blackmore. Has this been taken into account?</p> <p><i>I believe that R25 and R26 should be removed from the LDP. Planners should refer to the Blackmore village Heritage Association "neighbourhood plan" which clearly sets out our local housing needs to avoid further development locally.</i></p>	Noted.	No change.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24668 - Mr Eric John Webb [1830]	Object	<p>Regularisation of travellers sites was done without prior warning, it aims solely to meet numbers and this rationale makes the plan unacceptable and unsound.</p> <p><i>* A clear need for the proposals to be reconsidered as part of a new 'strategy' for the Villages (Including Blackmore) in the North of the borough/North of Brentwood town.</i></p> <p><i>* Proper and appropriate consultation with Epping Forests District Council to ensure that these developments on the boundaries or the two boroughs are appropriately addressed with capable, sustainable integrated plans. [30+ houses in Fingrith Hall lane+ 4 pairs of semi's on former Nine Ashes Farm affect Blackmore I And more are being developed In King Street on the pub site]</i></p> <p><i>* Proper consideration to alternative sites in the Village- Brown field Red Rose Farm, or the area - Stondon or re-Inclusion of Honey Pot Lane. These are either more suitable or more sustainable or both.</i></p> <p><i>* Housing needs In the area do not require this density development- assign more to other areas</i></p> <p><i>. * Perform a proper and appropriate Housing Need Survey and rely on the outcome of that.</i></p> <p><i>* Do not propose access to/egress from sites (such as R25 and R26 on roads entirely unsuitable for it.</i></p> <p><i>. * Do not propose developments In a place (Blackmore R25 and R26) where there Is already a severe flooding problem which h the development will worsen and no mitigation proposal in the plans.</i></p> <p><i>* Respect results of prior planning enquiries which found that Traveller pitches Plot 3 oak Tree Farm were not appropriate. Likewise no not recognise Plots 1 and 2 which were previously not approved for entirely appropriate reasons.</i></p>	Noted.	No change.

## POLICY HP08: REGULARISING SUITABLE EXISTING TRAVELLER SITES

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24458 - Mr Mark Mumby [8379]	Object	<p>Object to this policy. Development in Blackmore would be damaging to the area because: There are errors in the plan, population states 829 but does not include houses past Red Rose Lane or the residents in Chelmsford Road and Traveller site. Duty to cooperate. Red Rose Lane is single track and wont cope with more traffic; Flood Risk and Infrastructure requirements - no infrastructure improvements have been listed in R25 or R26. The local school is at capacity with no room for more children. The doctors is too at capacity, waiting times are bad already. Electricity and services wont be able to cope with 70 extra houses.</p> <p><i>The issues listed shows that the modification would be to remove sets R25 and R26 from the plan. Blackmore Village Heritage Association has produced a plan which should be referred to by the planners. The Plan sets out our local housing needs for our community.</i></p>	Noted.	No change.

*POLICY HP10: SUB-DIVISION OF PITCHES OR PLOTS*

22394 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Criteria A. c. of Policy HP10 seeks to restrict sub-division of Gypsy &amp; Traveller sites to no more than 10 pitches per site. Chelmsford City Council's Local Plan EIP Inspector questioned restriction. Post hearing advice-National planning policy for traveller sites requires criteria based policies should be fair and effective. Inspector advises available evidence does not adequately demonstrate why sites should be restricted, and policy contains other criteria to consider impact and scale. Inspector recommended criterion not justified and should be deleted. BBC should provide appropriate evidence in respect of this matter. If no supporting evidence, then recommended criterion is deleted.</p> <p><i>Consideration should be given to the Chelmsford Inspector's letter and if there is no appropriate evidence for BBC then delete criterion A. c. from Policy HP10.</i></p>	Noted.	No change.
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## POLICY HP11: PROPOSALS FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE ON WINDFALL SITES

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY HP11: PROPOSALS FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE ON WINDFALL SITES</i></b>				
22395 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Criteria A. i. of Policy HP11 seeks to restrict the capacity of Gypsy &amp; Traveller sites to no more than 10 pitches per site. Chelmsford City Council's Local Plan EIP Inspector questioned restriction. Post hearing advice-National planning policy for traveller sites requires criteria based policies should be fair and effective. Inspector advises available evidence does not adequately demonstrate why sites should be restricted, and policy contains other criteria to consider impact and scale. Inspector recommended criterion not justified and should be deleted. BBC should provide appropriate evidence in respect of this matter. If no supporting evidence, then recommended criterion is deleted.</p> <p><i>Consideration should be given to the Chelmsford Inspector's letter and if there is no appropriate evidence for BBC then delete criterion A. i. from Policy HP11.</i></p>	Noted.	No change.
23194 - Environment Agency (Mr Pat Abbott) [8308]	Support	<p>Should contain the need for GT sites to be situated in areas that are low risk from flooding. Caravans, mobile homes and park homes intended for permanent residential use are classed as 'Highly Vulnerable' so are not permitted in Flood Zone 3, and require the exception test in Flood Zone 2. It's also very difficult to make caravans, mobile homes and park homes safe through raising floor levels. There should be a reference to the need for any site proposal to provide confirmation that there are adequate warning and evacuation arrangements for caravan sites used for short-let or holiday use.</p> <p><i>Amend as suggested</i></p>	Support Welcomed	No further action required

## POLICY HP12: PLANNING FOR INCLUSIVE COMMUNITIES

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY HP12: PLANNING FOR INCLUSIVE COMMUNITIES</i></b>				
24299 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The approach set out in the PSLP for design and place-making is broadly supported. However, we note that there are effectively seven policies (HP12 - HP18) which provide the requirements against these matters. We also note that there are some areas of repetition on some of the objectives against those policies. We consider that those commenting on and determining applications should preferably have one or two identified policies to refer to and/or applicable thresholds to more succinctly set out requirements. This would ensure that planning applications can be more effectively judged against context, design and place-shaping criteria.</p> <p><i>There are seven policies on Design and Place Making. This should be reduced to one or two policies to reduce repetition and improving consistency in determining planning applications.</i></p>	Support Welcomed	No change
24044 - Croudace Strategic Ltd [2656]	Support	<p>Policy HP12: Planning for Inclusive Communities refers to the need to plan for and build inclusive environments that support communities. Proposals should provide access to good quality community spaces, services and infrastructure, encouraging social interaction, ensuring inclusivity and promoting safety. The policy is deemed "consistent" with NPPF (section 8) "Promoting Healthy and Safe Communities" which states that planning policies should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and support healthy lifestyles. The policy is therefore considered sound.</p>	Support Welcomed	No further action required

## POLICY HP12: PLANNING FOR INCLUSIVE COMMUNITIES

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24326 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The approach set out in the PSLP for design and place-making is broadly supported. However, we note that there are effectively seven policies (HP12 - HP18) which provide the requirements against these matters. We also note that there are some areas of repetition on some of the objectives against those policies. We consider that those commenting on and determining applications should preferably have one or two identified policies to refer to and/or applicable thresholds to more succinctly set out requirements. This would ensure that planning applications can be more effectively judged against context, design and place-shaping criteria.</p> <p><i>There are seven policies on Design and Place Making. This should be reduced to one or two policies to reduce repetition and improving consistency in determining planning applications</i></p>	Support Welcomed	No change
23250 - Mid and South Essex STP (Kerry Harding) [3791]	Support	We are pleased to note that the policies within the LP support our health and wellbeing objectives.	Support Welcomed	No further action required

***POLICY HP13: CREATING SUCCESSFUL PLACES***

22313 - Essex Bridleways Association (Mrs Sue Dobson) [3855]	Object	<p>Policy HP13: points e and f set out the requirement for new developments to be accessible, but they appear to only cater for pedestrians and cyclists, thereby discriminating against equestrians. As mentioned in our comments against BE13, any new off-road routes created should be multi-user routes by default thereby ensuring their accessibility by all vulnerable road users, instead of catering only for pedestrians and cyclists.</p> <p><i>To make this Plan sound, we suggest that point f is reworded thus: 'access, routes and connectivity for pedestrians, cyclists and equestrians through and out from the development...'</i></p>	Noted and agreed.	Consider editing criteria 'f' to include equestrians of list of users.
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## POLICY HP13: CREATING SUCCESSFUL PLACES

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24045 - Croudace Strategic Ltd [2656]	Support	Policy HP13: Creating Successful Places seeks that proposals meet high design standards, in order to deliver safe, inclusive, attractive and accessible places. Elements A-M of policy HP13 identify measures considered to create successful places, in accordance with section 12 of the NPPF on "Achieving Well-Designed Places". The NPPF (para 128) states that design quality should be considered throughout the evolution and assessment of individual proposals. Policy HP13 is therefore considered to be "consistent" with the NPPF and sound.	Support Welcomed	No further action required
24327 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The approach set out in the PSLP for design and place-making is broadly supported. However, we note that there are effectively seven policies (HP12 - HP18) which provide the requirements against these matters. We also note that there are some areas of repetition on some of the objectives against those policies. We consider that those commenting on and determining applications should preferably have one or two identified policies to refer to and/or applicable thresholds to more succinctly set out requirements. This would ensure that planning applications can be more effectively judged against context, design and place-shaping criteria.</p> <p><i>There are seven policies on Design and Place Making. This should be reduced to one or two policies to reduce repetition and improving consistency in determining planning applications.</i></p>	Support Welcomed	No change
22377 - Sport England (Mr. Roy Warren) [4294]	Support	The policy is supported especially criterion (k) which expects developments to meet active design principles. Criteria (a), (e), (f) are also supported due to their promotion of healthy and active environments. As well as according with Government policy in paragraph 91 of the NPPF, this approach would be consistent with the 2018 Essex Design Guide which has embedded design themes such as active design and health/well-being that is referred to in the reasoned justification	Support Welcomed	No further action required

## POLICY HP13: CREATING SUCCESSFUL PLACES

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24300 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The approach set out in the PSLP for design and place-making is broadly supported. However, we note that there are effectively seven policies (HP12 - HP18) which provide the requirements against these matters. We also note that there are some areas of repetition on some of the objectives against those policies. We consider that those commenting on and determining applications should preferably have one or two identified policies to refer to and/or applicable thresholds to more succinctly set out requirements. This would ensure that planning applications can be more effectively judged against context, design and place-shaping criteria.</p> <p><i>There are seven policies on Design and Place Making. This should be reduced to one or two policies to reduce repetition and improving consistency in determining planning applications</i></p>	Support Welcomed	No change

***POLICY HP14: RESPONDING TO CONTEXT***

24301 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The approach set out in the PSLP for design and place-making is broadly supported. However, we note that there are effectively seven policies (HP12 - HP18) which provide the requirements against these matters. We also note that there are some areas of repetition on some of the objectives against those policies. We consider that those commenting on and determining applications should preferably have one or two identified policies to refer to and/or applicable thresholds to more succinctly set out requirements. This would ensure that planning applications can be more effectively judged against context, design and place-shaping criteria.</p> <p><i>There are seven policies on Design and Place Making. This should be reduced to one or two policies to reduce repetition and improving consistency in determining planning applications</i></p>	Support Welcomed	No change
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<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24328 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The approach set out in the PSLP for design and place-making is broadly supported. However, we note that there are effectively seven policies (HP12 - HP18) which provide the requirements against these matters. We also note that there are some areas of repetition on some of the objectives against those policies. We consider that those commenting on and determining applications should preferably have one or two identified policies to refer to and/or applicable thresholds to more succinctly set out requirements. This would ensure that planning applications can be more effectively judged against context, design and place-shaping criteria.</p> <p><i>There are seven policies on Design and Place Making. This should be reduced to one or two policies to reduce repetition and improving consistency in determining planning applications</i></p>	Support Welcomed	No change

#### ***POLICY HP15: PERMEABLE AND LEGIBLE LAYOUT***

24303 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The approach set out in the PSLP for design and place-making is broadly supported. However, we note that there are effectively seven policies (HP12 - HP18) which provide the requirements against these matters. We also note that there are some areas of repetition on some of the objectives against those policies. We consider that those commenting on and determining applications should preferably have one or two identified policies to refer to and/or applicable thresholds to more succinctly set out requirements. This would ensure that planning applications can be more effectively judged against context, design and place-shaping criteria</p> <p><i>There are seven policies on Design and Place Making. This should be reduced to one or two policies to reduce repetition and improving consistency in determining planning applications</i></p>	Support Welcomed	No change
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## POLICY HP15: PERMEABLE AND LEGIBLE LAYOUT

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24329 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The approach set out in the PSLP for design and place-making is broadly supported. However, we note that there are effectively seven policies (HP12 - HP18) which provide the requirements against these matters. We also note that there are some areas of repetition on some of the objectives against those policies. We consider that those commenting on and determining applications should preferably have one or two identified policies to refer to and/or applicable thresholds to more succinctly set out requirements. This would ensure that planning applications can be more effectively judged against context, design and place-shaping criteria.</p> <p><i>There are seven policies on Design and Place Making. This should be reduced to one or two policies to reduce repetition and improving consistency in determining planning applications</i></p>	Support Welcomed	No change

*POLICY HP16: BUILDINGS DESIGN*

24304 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The approach set out in the PSLP for design and place-making is broadly supported. However, we note that there are effectively seven policies (HP12 - HP18) which provide the requirements against these matters. We also note that there are some areas of repetition on some of the objectives against those policies. We consider that those commenting on and determining applications should preferably have one or two identified policies to refer to and/or applicable thresholds to more succinctly set out requirements. This would ensure that planning applications can be more effectively judged against context, design and place-shaping criteria.</p> <p><i>There are seven policies on Design and Place Making. This should be reduced to one or two policies to reduce repetition and improving consistency in determining planning applications</i></p>	Support Welcomed	No change
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<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24046 - Croudace Strategic Ltd [2656]	Support	Policy HP16: Buildings Design seeks for development to be well designed and of a high quality, having regard to Development Management criteria including scale, density, layout, siting, character and appearance. This policy is considered to be "consistent" with the NPPF having particular regard to Section 12 on "Achieving Well-Designed Places" and therefore sound.	Support Welcomed	No further action needed
24330 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The approach set out in the PSLP for design and place-making is broadly supported. However, we note that there are effectively seven policies (HP12 - HP18) which provide the requirements against these matters. We also note that there are some areas of repetition on some of the objectives against those policies. We consider that those commenting on and determining applications should preferably have one or two identified policies to refer to and/or applicable thresholds to more succinctly set out requirements. This would ensure that planning applications can be more effectively judged against context, design and place-shaping criteria.</p> <p><i>There are seven policies on Design and Place Making. This should be reduced to one or two policies to reduce repetition and improving consistency in determining planning applications.</i></p>	Support Welcomed	No change

## POLICY HP17: PAVING OVER FRONT GARDENS

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY HP17: PAVING OVER FRONT GARDENS</i></b>				
24305 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The approach set out in the PSLP for design and place-making is broadly supported. However, we note that there are effectively seven policies (HP12 - HP18) which provide the requirements against these matters. We also note that there are some areas of repetition on some of the objectives against those policies. We consider that those commenting on and determining applications should preferably have one or two identified policies to refer to and/or applicable thresholds to more succinctly set out requirements. This would ensure that planning applications can be more effectively judged against context, design and place-shaping criteria.</p> <p><i>There are seven policies on Design and Place Making. This should be reduced to one or two policies to reduce repetition and improving consistency in determining planning applications</i></p>	Support Welcomed	No change
24331 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The approach set out in the PSLP for design and place-making is broadly supported. However, we note that there are effectively seven policies (HP12 - HP18) which provide the requirements against these matters. We also note that there are some areas of repetition on some of the objectives against those policies. We consider that those commenting on and determining applications should preferably have one or two identified policies to refer to and/or applicable thresholds to more succinctly set out requirements. This would ensure that planning applications can be more effectively judged against context, design and place-shaping criteria.</p> <p><i>There are seven policies on Design and Place Making. This should be reduced to one or two policies to reduce repetition and improving consistency in determining planning applications.</i></p>	Support Welcomed	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY HP18: DESIGNING LANDSCAPE AND THE PUBLIC REALM</i></b>				
22314 - Essex Bridleways Association (Mrs Sue Dobson) [3855]	Object	<p>Policy HP18 and para 6.112: no mention has been made to ensure accessibility for all throughout new developments, and paragraph 6.112 mentions joining up landscape features and open spaces to 'create coherent linked landscape networks' but again, pedestrians and cyclists are the only user groups mentioned.</p> <p><i>To make this Plan sound, we suggest that access for equestrians is incorporated into this policy and confirmed in the reasoned justification.</i></p>	Noted and agreed.	Consider including equestrians in list of users under 6.112
24306 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The approach set out in the PSLP for design and place-making is broadly supported. However, we note that there are effectively seven policies (HP12 - HP18) which provide the requirements against these matters. We also note that there are some areas of repetition on some of the objectives against those policies. We consider that those commenting on and determining applications should preferably have one or two identified policies to refer to and/or applicable thresholds to more succinctly set out requirements. This would ensure that planning applications can be more effectively judged against context, design and place-shaping criteria</p> <p><i>There are seven policies on Design and Place Making. This should be reduced to one or two policies to reduce repetition and improving consistency in determining planning applications</i></p>	Support Welcomed	No change

## POLICY HP18: DESIGNING LANDSCAPE AND THE PUBLIC REALM

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24332 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The approach set out in the PSLP for design and place-making is broadly supported. However, we note that there are effectively seven policies (HP12 - HP18) which provide the requirements against these matters. We also note that there are some areas of repetition on some of the objectives against those policies. We consider that those commenting on and determining applications should preferably have one or two identified policies to refer to and/or applicable thresholds to more succinctly set out requirements. This would ensure that planning applications can be more effectively judged against context, design and place-shaping criteria.</p> <p><i>There are seven policies on Design and Place Making. This should be reduced to one or two policies to reduce repetition and improving consistency in determining planning applications.</i></p>	Support Welcomed	No change
23982 - Bellway Homes and Crest Nicholson [8351]	Support	<p>Policy HP18: Designing Landscape and the Public Realm, in combination with Policy R01(I) clause C, provide an adequate policy framework for guiding a future landscape scheme - including the provision of green infrastructure between R01 and the development of the West of Basildon.</p>	Support Welcomed	No further action needed

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Heritage</i>				
22396 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>BBC should be satisfied has appropriate evidence base,such as Historic Environment Characterisation,to support its heritage strategies and Local Plan policies. Most policies are not phrased in positive manner,contrary to NPPF paragraph 185 (plans to set out positive strategy for conservation and enjoyment of historic environment). Should be consideration given to amending wording of heritage policies to be positive and support proposals which protect and enhance heritage assets,both designated or non-designated. Further consideration should be given to consolidation of 5 policies,which currently address all various heritage assets separately.NPPF requires consideration of any heritage asset and its contribution made by its setting.</p> <p><i>BBC should seek to ensure the Local Plan is supported by the appropriate heritage evidence. It is recommended that the policies are reworded positively, and that consideration be given to the potential to consolidate the policies.</i></p>	Noted	Consider rewording policies to be ore positive.
<hr/>				
<i>6.120</i>				
22397 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>4. Consistent with National Policy. The NPPF at paragraph 187 advises that LPA's should maintain or have access to a historic environment record, which should contain up-to-date evidence about the historic environment in their area. Footnote 7 provides a link to the Historic England website to access the Historic Environment Records for Brentwood. It is considered that a link to the Essex Historic Environment Record is more appropriate, which provides a list of heritage assets within the area and general character assessments.</p> <p><i>Amend footnote 7 to paragraph 6.120 to provide a link to the Essex Historic Environment Record <a href="http://www.heritagegateway.org.uk/gateway/">http://www.heritagegateway.org.uk/gateway/</a></i></p>	Noted and agreed.	Amend footnote 7 to paragraph 6.120 to provide a link to the Essex Historic Environment Record <a href="http://www.heritagegateway.org.uk/gateway/">http://www.heritagegateway.org.uk/gateway/</a>
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>6.125</b>				
22398 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>4. Consistent with National Policy. Heritage assets include all non-designated archaeological sites and deposits.</p> <p><i>Amend first sentence of paragraph 6.125 as follows - '... local significance, or non-designated archaeological sites and deposits which ...'</i></p>	Noted.	No change.

***POLICY HP19: CONSERVATION AND ENHANCEMENT OF HISTORIC ENVIRONMENT***

23967 - CEG Land Promotions Limited [5050] 24025 - Ward-Booth Partnership (Mr Robert Ward-Booth) [8272]	Object	<p>In this regard Paragraph 185 makes it clear that Plans should set out a positive strategy for conservation which should take account of the desirability of sustaining and enhancing Heritage Assets. This guidance is extended in Paragraph 192 which makes clear that in determining applications Council's should have regard to the desirability of sustaining and enhancing the significance of Heritage Assets. However, the NPPF does not say that there should be any prescriptive requirement that development proposals must both sustain and enhance Heritage Assets. As drafted the wording of Policy HP19 states that all development proposals that affect Heritage Assets and their setting will be required to conserve, sustain and enhance designated and non-designated heritage assets. I would respectfully suggest that this proposed wording is contrary to national guidance set out in the NPPF and that it is therefore unsound.</p> <p><i>In this respect I would request that consideration should be given to re-wording of Policy HP19 A.a to read as follows: "have regard to the desirability to conserve, sustain and enhance designated and nondesignated heritage assets including views into and out of conservation areas and their settings; and be sensitively sited and integrated in accordance with advice in accordance with national policy and guidance"</i></p>	Noted.	No change.
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY HP20: LISTED BUILDINGS</i></b>				
23968 - CEG Land Promotions Limited [5050]	Object	<p>The Policy is not consistent with the NPPF or statutory requirements as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 about listed buildings and how proposals that affect them should be assessed. Some modifications are proposed in our response to question no. 6 to address this.</p> <p><i>The following aspects of the policy require modification to ensure consistency with the NPPF and statutory requirements as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990: Criterion A. "sympathetic to its character and setting" is not consistent with NPPF. Criterion D. "only be permitted in exceptional circumstances;" is not consistent with the NPPF or 1990 Act.</i></p> <p><i>It is recommended that the policy is re-visited generally to ensure consistency with the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990.</i></p>	Noted and agreed.	Revisit policy and make reference to the Planning (Listed Building and Conservation Areas) Act 1990.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY HP21: CONSERVATION AREAS</i></b>				
24026 - Ward-Booth Partnership (Mr Robert Ward-Booth) [8272]	Object	<p>Paragraphs 195 and 201 of the NPPF provide a carefully considered mechanism for determination of applications which affect Conservation Areas and which are based on an assessment of the impact of proposed development on the significance of the Heritage Asset. In this way the NPPF provides a mechanism which protects those elements of the Historic Built Environment which are of genuine value whilst also allowing sustainable development and change. Policy HP21 C does not make any reference to the impact of proposed development on the significance of the Conservation Area and instead seeks to impose a general requirement to preserve all existing buildings unless they are demonstrably harmful or unless they make "no material contribution" to the character and appearance of the area. By departing from the policy approach set out in the NPPF and by adopting the form of words set out in HP21 c. the practical effect of the proposed policy will be to introduce a presumption against change rather than a presumption in favour of preserving the value and significance of Heritage Assets. This will act as a barrier to sustainable development and will be contrary to NPPF policy guidance.</p> <p><i>Consider re-wording of Policy HP21 c to read as follows: "where demolition is proposed the proposed development will preserve or enhance the significance of the Conservation Area</i></p>	Noted.	Consider re-wording of Policy HP21 c to read as follows: "where demolition is proposed the proposed development will preserve or enhance the significance of the Conservation Area

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>6.143</i>				
24027 - Ward-Booth Partnership (Mr Robert Ward-Booth) [8272]	Object	<p>The national design guidance (examples include Historic England / CABE publication "Building In Context New Development in Historic Areas") which make it clear that good quality contemporary design and good quality contemporary materials can be successfully used in the most sensitive heritage environment. Whilst it is essential that the council should resist the use of harmful, poor quality or inappropriate materials the Local Plan should not impose barriers to good quality contemporary materials. Therefore the wording in the para is unjustified and be removed from the Local Plan.</p> <p><i>The wording in the para is unjustified and be removed from the Local Plan.</i></p>	Noted.	No change.
<i>POLICY HP22: LOCAL HERITAGE ASSETS</i>				
24071 - Ward-Booth Partnership (Mr Robert Ward-Booth) [8272]	Object	<p>Experience suggest that the Council's assessment as to what constitutes a building of genuine local heritage significance is not necessarily well justified (please see Appeal Ref APP/H1515/A/14/2219012) and inappropriate designation Local Heritage Assets can result in an unjustified barrier to sustainable development. Equally, it is common to find examples of buildings which do have Local historic value but which are not included on the List of Local Heritage Assets which has been prepared by the Local Planning Authority. To be consistent with National Planning policy the determining factor in applications which affect undesignated heritage assets should be the actual significance of the asset concerned (NPPF paragraph 197) and not the presence or absence of any particular building on a Council list.</p> <p><i>Consider re-wording of Policy HP22 A. to read as follows: "There is a general presumption in favour of the retention of local heritage assets, including buildings, structures, features and gardens of local interest. In addition, the Council will conserve the traditional landscape and nature conservation character of Protected Lanes."</i></p>	Noted.	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>Chapter 7. Prosperous Community</b>				
<i>Delivering Economic Growth</i>				
23120 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>The Council questions whether the Spatial Strategy is therefore justified and consistent with national policy. The two transport corridors don't offer comparable choices in terms of the capacity of these transport connections. Four reasonable site alternatives in the Central Brentwood Corridor have been disregarded in the Sustainability Appraisal, despite having few constraints and being able to tap into the potential for movement capacity. This is considered to be in conflict with sustainable development when sites which have significant constraints to development or delivery have been included within the Plan, at the expense of sites which have fewer constraints.</p> <p><i>Using the Sustainability Appraisal and other evidence, the Plan should select sites within the Central Brentwood Growth Corridor that provide opportunity for extensions to towns and villages that can encourage more sustainable travel choices and take advantage of the superior infrastructure available. This should help encourage commuting behaviour to shift away from private car use and therefore make this location a more sustainable and viable option to concentrate growth. Chapter 3 should be modified as a result along with all land use allocations in Chapter 6 and Chapter 7.</i></p>	Noted.	No change.
23710 - Ms Heather Dunbar [8337] 23821 - Sow & Grow Nursery (Mr. Derek Armiger) [303] 23839 - Sow & Grow Nursery (Ms Kim Armiger) [4657] 23857 - Ms Maxine Armiger [4656]	Support	Employment land policies and land allocations are supported as sound.	Support Welcomed	No further action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>7.1</b>				
24341 - Childerditch Industrial Estate [8371]	Support	<p>Section 7: Prosperous Communities: This section of the PSLP confirms Brentwood Borough Council's Economic Strategy, which includes a number of Economic Aims and Strategic Priorities. These will help facilitate sustainable development, which is required to ensure that the Plan is sound. Paragraph 7.1 of the Plan recognises the importance of the Borough as being a high-quality environment within close proximity to London. The economic aims include the desire to encourage high value, diverse, employment uses that will provide a significant number of skilled and high-quality jobs; and to encourage the better utilisation, upgrading and redevelopment of existing land and buildings. These aims are supported and are reflected in the indicative proposed masterplan accompanying these representations.</p> <p><i>None proposed.</i></p>	Support welcomed.	No further action required.
<b>7.3</b>				
22401 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>BBC needs to satisfy itself that Local Plan has clear economic strategy, with robust phasing and delivery mechanisms in place to ensure that full employment requirements can be delivered over whole Plan period, in line with NPPF paragraph 23. It is important given 55% of BBC's employment land allocation in Plan is proposed at BEP. Site still has uncertainty over access and how and when will be delivered. Furthermore, BBC's evidence base (Economic Futures 2013-2033 Report 2018) indicates there is need for site to be delivered early in Plan period, in order to accommodate local businesses that may be affected by employment land re-allocation proposed in Plan.</p> <p><i>Clarity is sought on the deliverability and phasing of employment land allocations in order to meet requirements outlined in the Local Plan.</i></p>	Noted	TBC

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24343 - Childerditch Industrial Estate [8371]	Support	In addition to the Economic Aims, the PSLP sets out a number of Strategic Priorities. Of these, Strategic Policies P1 and P6 are strongly supported. P1 seeks to support business development and growth. P6 seeks to promote Brentwood Borough as a place to visit and invest, thereby encouraging the visitor economy. Childerditch Industrial Estate would assist in meeting those objectives.	Support Welcomed	No further action required
<i><b>POLICY PC01: CULTIVATING A STRONG AND COMPETITIVE ECONOMY</b></i>				
22360 - Rochford District Council (Planning Policy) [4178]	Support	The Council is broadly supportive of policy PC01 and considers it to generally align with national policy and other local and national objectives.	Support Welcomed	No further action required
24105 - Freeths LLP (Mr Paul Brailsford) [5642]	Support	The policy's acknowledgement of the need to "improve access to a range of employment opportunities for the borough's residents". This is consistent with our own assessment of market demand for the site which spans a range of sectors and uses beyond traditional B class employment uses.	Support Welcomed	No further action required
<i><b>7.8</b></i>				
22595 - Mr P Kingston [8255]	Support	The land south of Brook Street and east of the M25, along with the land south of the A12 and west of the M25, should be considered for allocation in the emerging Local Plan to accommodate future employment requirements.	Support Welcomed	No further action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY PC02: JOB GROWTH AND EMPLOYMENT LAND</i></b>				
23107 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>The amount of proposed employment land is broadly sufficient to meet Brentwood's overall forecast employment land needs. However that the policy makes the assumption that there are no capacity issues for existing infrastructure, or any needs for supporting infrastructure to be provided and this lack of clarity will make the policy ineffective, unjustified. PC02 and PC03 should incorporate additional provisions to manage the release and expansion of the locations within the Southern Brentwood Growth Corridor, supported by an Employment Land Trajectory, to make it more effective, justified and consistent with national policy.</p> <p><i>PC02 and PC03 should be amended to incorporate a staggered delivery target for new employment land, supported by a new Employment Land Trajectory within the Plan's Appendices, to coordinate the phased release of new and expanded employment land to ensure it can be linked to specific and necessary upgrades to supporting infrastructure. This will minimise the impact growth will have on existing highway routes in particular, which could otherwise impact on cross-boundary issues within the wider South Essex economic corridor.</i></p>	Noted	TBC
23751 - St Modwen Properties PLC [5124]	Object	<p>Object to Policy PC02, at the very least it should be amended to state that the allocation of 47.39 ha of new employment land is a minimum. We have some reservations as to the quantum of employment land that is proposed under the various scenarios considered as part of the Brentwood Economic Futures 2013-2033 study. The Council should be considering the Experian based forecasts set out under Scenario A as a minimum requirement and could be more proactive by allowing for a greater buffer beyond the requirement of land set out under Scenario A.</p> <p><i>Policy PC02 should be amended to state that the allocation of 47.39 ha of new employment land is a minimum.</i></p>	Noted.	No further action.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24347 - Childerditch Industrial Estate [8371]	Support	<p>Job Growth and Employment Land In determining the employment land allocations necessary to ensure that an adequate number of jobs can be provided, it is important that the Plan is sufficiently flexible to adapt to rapid change (as required by Paragraph 11 of the NPPF), and that it does so in a manner that ensures that the boundary of the Green Belt will not need to be reviewed before the end of the Plan period (Paragraph 136 of the NPPF refers). As set out within Paragraph 2.54 of the PSLP, 89% of the Borough lies within the Metropolitan Green Belt. There is not sufficient land outside of the Green Belt for the Council to deliver the requisite level of housing and employment land. It is therefore necessary and justified to amend the boundary of the Green Belt as part of the Local Plan process. Paragraph 8.84 of the PSLP refers to the need to release land from the Green Belt in order to achieve the Council's growth strategy. This release has been carefully balanced to ensure that sustainable development can be achieved, whilst ensuring that the longer-term purpose, integrity and benefit of the Green Belt remains intact. We support the Council's approach insofar as our client's land interests are concerned and it is important to ensure that any changes to the Green Belt endure beyond the Plan period, having regard to its intended permanence, as required by Paragraph 136 of the NPPF. The PSLP sets out the proposed allocation at Childerditch Industrial Estate can come forward over the next 1 to 10 years. The indicative proposed masterplan prepared by CMP Architects provides an illustrative approach as to how the proposed allocation could come forward in conjunction with the redevelopment of the existing Park. The land is available now and there are no overriding constraints to delivery. The Plan would be justified and effective in this respect. The Brentwood Economic Futures (2013-2033) Final Report sets out 4 scenarios for quantifying the potential requirement for jobs in order to support the growth of the Plan Period. The Report provides indicative job capacity figures, which have been based on assumptions, in terms of both site capacity and B1a/b, B1c/B2, and B8 split. (Refer to table in attached copy of full representation). In respect of Childerditch Industrial Estate however, the Report has not taken into account that the existing</p>	Support Welcomed	No further action needed

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		Park can be redeveloped in a more efficient and effective manner to provide more job growth, as provided for in these representations. Overall, the proposed allocation will enable the upgrading of the existing units on the site through increased investment.		
23178 - Chelmsford City Council (Ms Gemma Nicholson) [8305]	Support	CCC is supportive of BBC approach to meeting the forecasted employments needs through allocating 47.39ha employment land as set out in Policy PC03 Employment Land Allocations. The Local Plan allocates additional strategic employment land at Brentwood Enterprise Park. In addition, further employment land is allocated and policies in the Local Plan seek to protect existing employment land providing a mix and range of employment sites. Overall CCC is supportive of this approach and do not raise any objections under soundness or legal compliance.	Support Welcomed	No further action required
24011 - Croudace Strategic Ltd [2656]	Support	<p>Policy PC02: Job Growth and Employment Land identifies that provision is made for at least 47.39ha of new employment land (B-use) to address the needs of the Borough up to 2033. To ensure that the Plan is more effective, it is recommended that this is followed by supporting text setting out the extent of need as derived from the Brentwood Economic Futures report (2018) and Strategic Housing Market Assessment (2018).</p> <p><i>Recommended that PC02 is followed by supporting text setting out the extent of need as derived from the Brentwood Economic Futures report (2018) and Strategic Housing Market Assessment (2018). This need is proposed to be met through allocations set out at Policy PC03: Employment Land Allocations. This includes provision of appropriate new employment development on North of A1023 (part of the Land North of Shenfield R03 land use allocation).</i></p>	Support Welcomed.	No further action.



<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22361 - Rochford District Council (Planning Policy) [4178]	Support	The Council is broadly supportive of policy PC02 and Brentwood Borough Council's suggested approach to delivering 47.4 hectares of new employment land. The Council does not have any detailed comments to make regarding the proposed allocation of specific sites; however, it considers that Brentwood Borough Council as part of Brentwood Borough Council's wider growth strategy, can and will be adequately mitigated, particularly for sites in proximity to key strategic routes including the A127.	Support Welcomed	No further action required
23724 - S&J Padfield and Partners (SJP) [6122]	Support	The approach of allocating more employment land than anticipated to be needed is positively prepared, providing a buffer should the loss of current employment land be greater than anticipated. Allocating further employment land could assist in providing greater flexibility should sites not come forward as intended or greater losses in employment space occur.	Support Welcomed	No further action required
24047 - Croudace Strategic Ltd [2656]	Support	Policy PC02: Job Growth and Employment Land seeks that provision is made for 5,000 additional jobs in the Borough over the Plan period at a rate of 250 per year. NPPF Section 6 on "Building a Strong, Competitive Economy" sets out that planning policies should support economic growth, in order to create jobs and prosperity by taking a positive approach to sustainable new development. The strategic allocation at Land North of Shenfield supports economic growth and creates new opportunities and is "consistent" with national guidance and is sound.	Support Welcomed	No further action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>New Jobs</i>				
22403 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>The Local Plan can play key role in supporting and facilitating local job creation and increasing local skills levels. ECC is currently working with EPOA on these proposals with the intention to include these in a refreshed Essex County Council Developers' Guide to Infrastructure Contributions. 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' supporting text to Policy PC02.</p> <p><i>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.</i></p>	Noted. The Council welcomes the intention to improve the Developers' Guide to Infrastructure Contributions. The Council will continue collaborating with Essex County Council and other local authorities and partners in making the developers' guide a more effective instrument in the planning process.	No further action.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Employment land provision</i>				
23659 - EA Strategic Land LLP [279]	Object	<p>Brentwood Borough Council has under estimated the need for B-class employment land in the Borough, and that its employment land supply is insufficiently flexible.</p> <p><i>Site West of Thorndon Avenue, West Horndon is fully in accordance with the spatial strategy focused on transit orientated growth and should be allocated. No significant constraints with developing an urban extension at West Horndon, in addition to Dunton Hills Garden Village was identified by the Sustainability Appraisal. If Brentwood is to attempt to meet the housing needs, this approach is required.</i></p>	Noted.	No change.
<i>POLICY PC03: EMPLOYMENT LAND ALLOCATIONS</i>				
23945 - McColl's Retail Group PLC [3662]	Object	<p>Clause (d) is not justified in setting an unrealistically exhaustive approach for proving unsuitability for employment. In particular, applicants should not be forced to speculate on whether wholesale redevelopment would improve the prospects of a site. This is an enormously costly exercise compared with the other identified approaches of re-use, adaptation, and refurbishment. Clause (d) should therefore be restricted to these options and not include reference to redevelopment being explored.</p> <p><i>We would suggest that in order to be sound, the above changes to the clauses within Policy PC03 should be made. The general provisions of the policy should read similar to the following: "Within allocated employment areas, the Council will resist the loss of B-class uses. Redevelopment or change of use will only be permitted where one or more of the following criteria apply..."</i></p>	Noted	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23943 - McColl's Retail Group PLC [3662]	Object	<p>Object. Clause (b) is unsound because it is not positively prepared. Using a criteria that allows wholly affordable schemes to be brought forward on vacant employment sites represents a very poor approach to the social aspect of sustainable development. Paragraph 62 of the NPPF explains that affordable housing should contribute to the objective of creating mixed and balanced communities. The policy is not effective as the existing use value of vacant employment sites will be prohibitive to the developers of 100% affordable housing schemes, particularly as such sites are likely to have abnormal costs associated with remediation.</p> <p><i>We would suggest that in order to be sound, the above changes to the clauses within Policy PC03 should be made. The general provisions of the policy should read similar to the following: "Within allocated employment areas, the Council will resist the loss of B-class uses. Redevelopment or change of use will only be permitted where one or more of the following criteria apply..."</i></p>	Noted	Clause (b) is to be considered.
23942 - McColl's Retail Group PLC [3662]	Object	<p>Object. Clause (a) is unduly onerous and should be reworded: In reality, there is very limited likelihood of a non-B-class employment-generating use being able to demonstrate that it cannot be located elsewhere in the Borough. Also, there is no indication of what is meant by "significant employment"; this requires justification as sites such as Ashwells Road are under-occupied yet are theoretically capable of accommodating a much greater number of employees.</p> <p><i>We would suggest that in order to be sound, the above changes to the clauses within Policy PC03 should be made. The general provisions of the policy should read similar to the following: "Within allocated employment areas, the Council will resist the loss of B-class uses. Redevelopment or change of use will only be permitted where one or more of the following criteria apply..."</i></p>	Noted	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23684 - JTS Partnership LLP (Mr. Nick Pryor) [2581]	Object	<p>McColls Headquarters Site, Ongar Road, has been identified as Site 321 as an existing employment site in the Green Belt. As a site in the Green Belt, it should rank along other sites that have been brought forward existing employment sites not previously allocated and new land allocations. The Emerging Plan has identified such sites as being released from the Green Belt. The site has within it a number of non-designated heritage assets which would benefit from some form of residential development and the site provides an opportunity for some mixed use.</p> <p><i>The failure of the Local Authority to produce an updated Proposals Map means that the Plan is not sound. The lack of completion of the Green Belt Evidence Base means that the subject site has not been properly assessed. Also, in accordance with the February 2019 NPPF, there should be revisions to the Green Belt Policy, Criteria A g Limited Infilling addition to add the words - "Not cause substantial harm to the openness of the green belt where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the Local Planning Authority". Also further, the Criteria for replacement or substantial re-building of permanently occupied dwellings are too limiting. Any reference to 30% above original habitable floor space should be deleted and the wording of the Policy more in accordance with the NPPF and relate solely to disproportionate increases.</i></p>	Noted.	TBC.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24132 - Ford Motor Company (Mr Clive Page) [3769]	Object	<p>Ford notes that Draft Figure 7.6 and Appendix 2 of the PSD includes Part of allocation RO4 - 'Ford offices Eagle Way' (southern parcel of the Ford owned land) as an Existing Employment Site, whereby 2ha of land is proposed to be retained for employment purposes. However, there is no further evidence and/or explanation provided for this designation, which our Client indeed questioned and requested within our previous representations to the PSA consultation. With the new employment allocations alone, BBC appear to have more than supply of employment land to meet its overall forecast needs over the plan period - questioning the requirement to retain 2ha of employment floorspace at the Ford site (whereby there appears to be very limited, or indeed no market demand for such space with no real planning basis for the 2ha figure referenced). Accordingly, it is anticipated that the new supply through the 'Proposed Allocations' should sufficiently compensate for the full release of the Ford site for residential with the Draft allocation for the Site revised accordingly including the removal for the requirement for 2ha of employment land. It is also considered that the distance from Brentwood and Shenfield town centres and train stations would not be an attractive location for commercial investment - acknowledging that typically businesses requiring commercial properties of this size today, would pursue sites within close proximity of strategic infrastructure, trunk roads and more extensive local facilities and services. As such, and in light of current national policy parameters which specifically seek to promote sustainable forms of development, Ford wishes to object to the retention of employment uses at the Site - acknowledging that such a use is not considered an appropriate, or viable use of the Site in the future (contrary to the NPPF 2018).</p> <p><i>Client respectfully requests that the Site is removed from the listed 'Existing Employment Allocations' under Draft Figure 7.6. We also note that no reference is made to the re-provision of the Council Depot which we understand is likely to be retained for employment purposes into the early years of the plan period (given its current operational status).</i></p>	Noted.	TBC

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23108 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>The amount of proposed employment land is broadly sufficient to meet Brentwood's overall forecast employment land needs. However that the policy makes the assumption that there are no capacity issues for existing infrastructure, or any needs for supporting infrastructure to be provided and this lack of clarity will make the policy ineffective, unjustified. PC02 and PC03 should incorporate additional provisions to manage the release and expansion of the locations within the Southern Brentwood Growth Corridor, supported by an Employment Land Trajectory, to make it more effective, justified and consistent with national policy.</p> <p><i>PC02 and PC03 should be amended to incorporate a staggered delivery target for new employment land, supported by a new Employment Land Trajectory within the Plan's Appendices, to coordinate the phased release of new and expanded employment land to ensure it can be linked to specific and necessary upgrades to supporting infrastructure. This will minimise the impact growth will have on existing highway routes in particular, which could otherwise impact on cross-boundary issues within the wider South Essex economic corridor.</i></p>	Infrastructure requirements to help support new development growth planned within Brentwood Borough Council's Local Plan is considered in the Infrastructure Delivery Plan.	TBC.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23183 - London Borough of Havering (Mr Martyn Thomas) [7966]	Object	<p>The Local Plan does not evidence why the Brentwood Enterprise Park is would be an acceptable use at an important location in the Green Belt other than to refer the difficulties of accommodating the quantum of development within other parts of the Brentwood borough and the opportunity to capitalize on the connections in the Brentwood Growth Corridor (para. 7.23b).</p> <p><i>Policy PC03 Employment Land Allocations, Policy E11 Brentwood Enterprise Park and Site Allocation E11 Brentwood Enterprise Park should be amended: * to demonstrate why the proposal is compliant with the National Planning Policy Framework * to provide explicit commentary on the likely significant implications of the proposal for the wider strategic highway network given the proximity to Havering * to recognize the importance of working with other stakeholders (such as Transport for London and London Borough of Havering so that there can be certainty that the impacts of the Brentwood Enterprise Park proposal are satisfactory and can be accommodated without any adverse impact on the network beyond Brentwood * to recognize the role of the established joint working between authorities along the A127 corridor to ensure that the significant growth along this corridor is understood, assessed and mitigated as necessary. * to recognize the merit of the preparation of a Statement of Common Ground or Memorandum of Understanding between relevant stakeholders to recognize the issues involved and set out a joint commitment to recognizing these and addressing them * to recognize that the scale of the Brentwood Enterprise Park proposal and the traffic it will generate is likely to have significant adverse environmental impacts for the wider area (including Havering) and that these need to be considered and mitigated * to include cross reference to Policy BE11 Strategic Transport Infrastructure</i></p>	The allocation of employment sites was informed by the Council's evidence base including the Economic Futures 2013-2033 (January 2018) which indicates that there is likely demand for new commercial floorspace at Brentwood Enterprise Park, and the Housing and Economic Land Availability Assessment (HELAA) (October 2018) which confirms the site is suitable, available and achievable.	TBC.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23752 - St Modwen Properties PLC [5124]	Object	<p>Policy PC03 contains a prescriptive list of the circumstances when non B-class uses will be permitted in respect of "Redevelopment or change of use of business, office, general industry and distribution". Given that Policy E11 refers to the possibility of development for uses other than B-class uses i.e. for "any associated employment generating sui generis uses" we assume this part of Policy PC03 relates only to existing employment sites. However, in order for the policy to be effective, the opening paragraph should be amended as suggested below.</p> <p><i>The policy should be amended so that the opening paragraph reads as follows: "Within those areas allocated for general employment and office development, set out in Figure 7.6 and on the Brentwood Policies Map, the Council will seek to achieve and retain a wide range of employment opportunities. Further details in this regard are set out in the individual site allocation policies. In relation to existing employment sites redevelopment for non B-class uses will only be permitted where:[...]"</i></p>	Noted.	To be considered.
23799 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738]	Support	SUPPORT & COMMENT: insofar as this includes the employment to be retained on the site, as well as the new employment opportunities created by the new village centre (which will include retail and non-retail uses).	Support Welcomed	No further action needed
24048 - Croudace Strategic Ltd [2656]	Support	Policy PC03: Employment Land Allocations highlights areas allocated by the Council for general employment and office development. Para 82 of the NPPF states that planning policies should recognise and address the specific locational requirements of different employment sectors. The allocations set out in policy PC03 are informed by the wider spatial strategy, which aims to retain the Borough's character and encourage employment growth in suitable locations, in accordance with national planning policy. This policy is therefore deemed to be "consistent" with the NPPF and considered to be sound.	Support Welcomed	No further action required
24013 - Croudace Strategic Ltd [2656]	Support	We fully support this aspect of the Plan including the broad strategy underpinning both the housing and employment allocations.	Support Welcomed	No further action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24356 - Childerditch Industrial Estate [8371]	Support	<p>The policy sets out a number of considerations that are intended to relate to existing and proposed employment sites identified in Figure 7.6 of the PSLP. This includes Childerditch Industrial Estate. However, the PSLP also includes a specific policy that relates to Childerditch Industrial Estate (Policy E12, which will be addressed later in these representations). Paragraph 7.23 of the PSLP states that due to the difficulties of accommodating the quantum of employment land within other parts of the Borough, the opportunity has been taken to capitalise on the strategic connections of the South Brentwood Growth Corridor by extending employment land around Childerditch Industrial Estate. This approach is considered to be justified and consistent with national policy, as the proposed allocation seeks to make efficient use of an existing, highly sustainable employment site.</p> <p><i>It is considered that greater clarification should be added to Paragraph 7.23, Part b. ii. on where Policy PC03 applies, as Policy E12 covers the entirety of Childerditch Industrial Estate. It should be added that the proposed allocation at Childerditch Industrial Estate allows for the redevelopment of the existing Estate and new development on the extended areas, which will provide a location for employment generating sui generis uses, as provided for by Policy E12</i></p>	Support Welcomed.	No further action.
<hr/>				
<i>Figure 7.6: Employment Site Allocations</i>				
23769 - Strutt & Parker LLP (Jen Carroll) [6751]	Object	<p>Figure 7.6 of the PSLP should be amended to reflect the removal of employment land for 2ha as identified in Policy R03 (Land north of A1023) to reflected the proposed changes to Policy R03 to be solely for housing.</p> <p><i>The table included as this figure should therefore remove reference to Part of R03 - Land north of A1023 as a new employment allocation for 2ha.</i></p>	Noted.	TBC

Figure 7.6: Employment Site Allocations

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24133 - Ford Motor Company (Mr Clive Page) [3769]	Object	<p>Ford notes that Draft Figure 7.6 and Appendix 2 of the PSD includes Part of allocation RO4 - 'Ford offices Eagle Way' (southern parcel of the Ford owned land) as an Existing Employment Site, whereby 2ha of land is proposed to be retained for employment purposes. However, there is no further evidence and/or explanation provided for this designation, which our Client indeed questioned and requested within our previous representations to the PSA consultation. With the new employment allocations alone, BBC appear to have more than supply of employment land to meet its overall forecast needs over the plan period - questioning the requirement to retain 2ha of employment floorspace at the Ford site (whereby there appears to be very limited, or indeed no market demand for such space with no real planning basis for the 2ha figure referenced). Accordingly, it is anticipated that the new supply through the 'Proposed Allocations' should sufficiently compensate for the full release of the Ford site for residential with the Draft allocation for the Site revised accordingly including the removal for the requirement for 2ha of employment land. It is also considered that the distance from Brentwood and Shenfield town centres and train stations would not be an attractive location for commercial investment - acknowledging that typically businesses requiring commercial properties of this size today, would pursue sites within close proximity of strategic infrastructure, trunk roads and more extensive local facilities and services. As such, and in light of current national policy parameters which specifically seek to promote sustainable forms of development, Ford wishes to object to the retention of employment uses at the Site - acknowledging that such a use is not considered an appropriate, or viable use of the Site in the future (contrary to the NPPF 2018).</p> <p><i>Client respectfully requests that the Site is removed from the listed 'Existing Employment Allocations' under Draft Figure 7.6. We also note that no reference is made to the re-provision of the Council Depot which we understand is likely to be retained for employment purposes into the early years of the plan period (given its current operational status).</i></p>	Noted.	TBC.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>7.22</b>				
23944 - McColl's Retail Group PLC [3662]	Object	<p>The supporting text for clause (c) at paragraph 7.22 reveals that in this instance the Policy is neither effective nor justified. Requiring 24 months of marketing is grossly excessive without justification. The policy is not effective as it puts the Borough at risk of its employment sites deteriorating indefinitely whilst valuable redevelopment opportunities are put on hold due to the excessive marketing requirements. We would suggest that 12 months is a more than adequate time for robust marketing to be undertaken and would allow the Local Plan to be more adaptive to windfall opportunities.</p> <p><i>We would suggest that in order to be sound, the above changes to the clauses within Policy PC03 should be made. The general provisions of the policy should read similar to the following: "Within allocated employment areas, the Council will resist the loss of B-class uses. Redevelopment or change of use will only be permitted where one or more of the following criteria apply..."</i></p>	Noted.	No change.
22404 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>In paragraph 7.22 b. the use of the word 'normally' creates ambiguity as there is no definition of what constitutes 'normal' in this context. This could create 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 word 'normally' should be deleted in line with paragraph 16 d) of the NPPF.</p> <p><i>Amend paragraph 7.22 b. to delete the word 'normally'.</i></p>	Noted.	TBC.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>7.23</b>				
23753 - St Modwen Properties PLC [5124]	Object	<p>The reference to BEP within the context of opportunities for growth within the South Brentwood Growth Corridor is welcomed and supported. However, in our view the reference to "redeveloping brownfield land" in sub-paragraph (b)(i) is unnecessary given that the BEP Site has been assessed by the Council and considered to be suitable for strategic employment development. Accordingly, for purposes of clarity we request that sub-paragraph b. i. is reworded to read as follows: "developing land at Brentwood Enterprise Park (see Policy E11)". This would also correct the typographical error of "Site E01" which should instead refer to E11.</p> <p><i>Sub-paragraph 7.23.b. i. to be reworded to read as follows: "developing land at Brentwood Enterprise Park (see Policy E11)".</i></p>	Noted.	Revision to be considered.
22406 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>BBC needs to satisfy itself that Local Plan has clear economic strategy, with robust phasing and delivery mechanisms in place to ensure that full employment requirements can be delivered over whole Plan period, in line with NPPF paragraph 23. Is important given 55% of BBC's employment land allocation in Plan is proposed at BEP. Site still has uncertainty over access and how and when will be delivered. Furthermore, BBC's evidence base (Economic Futures 2013-2033 Report 2018) indicates there is need for site to be delivered early in Plan period, in order to accommodate local businesses that may be affected by employment land re-allocation proposed in Plan.</p> <p><i>Clarity is sought on the deliverability and phasing of employment land allocations in order to meet requirements outlined in the Local Plan.</i></p>	Noted.	TBC.

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue/Change to Plan</b>	<b>Council's Assessment</b>	<b>Action</b>
<b>7.24</b>				
22405 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	The wording in paragraph 7.24 somewhat contradicts other sustainable policies in Local Plan, particularly within the transport and connectivity section where the focus is on sustainable transport.  <i>Clarity is sought on how to resolve any conflict between the policies</i>	Noted.	No change.
<b>7.25</b>				
23754 - St Modwen Properties PLC [5124]	Support	The NPPF calls for Local Plans to make use of development opportunities. The recognition that the Lower Thames Crossing represents an opportunity which Brentwood Enterprise Park will realise is supported, as this is consistent with relevant national planning policy.	Support Welcomed	No further action required
<b>7.26</b>				
22407 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	BBC needs to satisfy itself that Local Plan has clear economic strategy, with robust phasing and delivery mechanisms in place to ensure that full employment requirements can be delivered over whole Plan period, in line with NPPF paragraph 23. It is important given 55% of BBC's employment land allocation in Plan is proposed at BEP. Site still has uncertainty over access and how and when will be delivered. Furthermore, BBC's evidence base (Economic Futures 2013-2033 Report 2018) indicates there is need for site to be delivered early in Plan period, in order to accommodate local businesses that may be affected by employment land re-allocation proposed in Plan.  <i>Clarity is sought on the deliverability and phasing of employment land allocations in order to meet requirements outlined in the Local Plan</i>	Noted.	TBC.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>7.30</b>				
22409 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>It is acknowledged that paragraph 7.30 recognises the need to manage transition of current employment sites, which are to be redeveloped for residential purposes, through early delivery of strategic sites within A127 corridor. BBC needs to be satisfied that their approach to dealing with proposals for employment land loss will not undermine supply of employment land (and sites) for the borough. Employment land loss to higher value land uses, particularly residential (or retail) use, might be anticipated if effective measures are not in place to manage this process. Considered that without such measures, strategy may not support existing businesses or deliver the jobs required within Brentwood borough.</p> <p><i>Clarity is sought on the deliverability and phasing of employment land allocations in order to meet requirements outlined in the Local Plan.</i></p>	Noted.	To be considered.
22408 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>BBC needs to satisfy itself that Local Plan has clear economic strategy, with robust phasing and delivery mechanisms in place to ensure that full employment requirements can be delivered over whole Plan period, in line with NPPF paragraph 23. Is important given 55% of BBC's employment land allocation in Plan is proposed at BEP. Site still has uncertainty over access and how and when will be delivered. Furthermore, BBC's evidence base (Economic Futures 2013-2033 Report 2018) indicates there is need for site to be delivered early in Plan period, in order to accommodate local businesses that may be affected by employment land re-allocation proposed in Plan.</p> <p><i>Clarity is sought on the deliverability and phasing of employment land allocations in order to meet requirements outlined in the Local Plan.</i></p>	Noted.	TBC.
23800 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738]	Support	Support	Support Welcomed	No further action required

## POLICY PC04: DEVELOPMENT AND EXPANSION OF BUSINESS SPACE

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY PC04: DEVELOPMENT AND EXPANSION OF BUSINESS SPACE</i></b>				
23869 - East Horndon Developments Ltd [8341]	Object	<p>Policy PC04 should not restrict new offices, development and research facilities to just in designated centres but also should allow for such facilities to come forward within the new allocated employment or existing employment sites where there are established public transport links. Suggested modification: Insert in Policy A a new sub-criteria c. "New employment allocated sites or established employment sites where there are public transport links including bus services."</p> <p><i>Recommendation: Insert in Policy A a new sub-criteria c". New employment allocated sites or established employment sites where there are public transport links including bus services."</i></p>	Noted.	TBC.
<b><i>POLICY PC05: EMPLOYMENT DEVELOPMENT CRITERIA</i></b>				
23723 - S&J Padfield and Partners (SJP) [6122] 23755 - St Modwen Properties PLC [5124] 24357 - Childerditch Industrial Estate [8371]	Object	<p>Policy PC05 does not specify whether it applies to existing and/or new employment land. The policy simply refers to development for employment uses. The wording of Policy PC05 is therefore ambiguous and is more restrictive than the site specific policy for Childerditch Industrial Estate (Policy E12). For example, Policy E12 requires provision to be made for improved walking and cycling links within the surrounding area. Policy PC05 on the other hand states that employment uses will be encouraged provided that the proposal is accessible by public transport. At present, there are no public transport connections directly available to Childerditch Industrial Estate, and whilst this may change in the future, there is no guarantee of if and when this will happen. On this basis, we object to Policy PC05 in its current form as it would not allow for an effective Plan.</p> <p><i>It is suggested that Policy PC05, Part A. a. be amended to state that proposals provide opportunities to be accessible by public transport, walking and cycling. At Childerditch Industrial Estate, opportunities are limited to provide public transport; however, in bringing forward proposals for the site, this issue can be reviewed with Brentwood Borough Council and Essex County Council.</i></p>	Noted.	TBC.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>7.37</i>				
22552 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	Please also reference the Thames Chase Community Forest as a resource.  <i>Please also reference the Thames Chase Community Forest as a resource.</i>	Support welcome.	No change.
<i>POLICY PC07: RETAIL AND COMMERCIAL LEISURE GROWTH</i>				
22362 - Rochford District Council (Planning Policy) [4178]	Support	The Council is broadly supportive of policy PC07 and considers it to be in general accordance with national policy and other local and national objectives. The Council considers the sequential approach taken to prioritising the siting of such uses to be appropriate and supports the use of a retail hierarchy that principally prioritises the siting of such uses in Brentwood's town centres. It is recognised, however, that Brentwood Borough Council may need to review its policy approach early to reflect the retail and leisure strategies of the emerging South Essex Joint Strategic Plan.	Support Welcomed	No further action required
23801 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738]	Support	SUPPORT & COMMENT: it is important to note the Brentwood Retail and Commercial Leisure Study (Dec2014) by NLP. The emerging West Horndon master plan includes a new village centre which incorporates shops and non-retail uses, such as potential health facilities. NLP suggested an additional 2000sqm of retail may be appropriate as part of the redevelopment of the industrial estate. Our latest masterplan shows around 2700sqm, but this includes non-retail uses.	Support Welcomed	No further action required

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
<b>7.48</b>				
22252 - Wood International Agency Ltd (Mrs Clare Lamont) [8230]	Support	Poor retail mix in town centre discouraging footfall and growth. Greater diversity is needed to drive footfall. There is a captive consumer base within the Brentwood area, high socio economic, wealthy, big spenders who are being largely ignored. The town centre does not have a high end retail offer to meet the desires and needs of these high spenders - it is a wasted opportunity. There isn't a high quality delicatessen, butcher or bakery. If rent are prohibited then a review is needed in conjunction with landlords.	Support Welcomed	No further action required
<b>7.53</b>				
23802 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738]	Support	Support	Support Welcomed	No further action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY PC08: RETAIL HIERARCHY OF DESIGNATED CENTRES</i></b>				
23117 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>We cannot determine from Brentwood's published evidence as to what assessments have been carried out to determine the likely impact of installing new District Centres in West Hordon or DHGV on Laindon Town Centre which is 2km from DHGV and one stop from West Hordon station. Laindon Town Centre is undergoing a multi-million pound regeneration. Footnote 10 which states that the designation of the DHGV service centre(s) as a District Shopping Centre and/or Local Centre(s) and any PSA could be altered by the South Brentwood Masterplan is not acceptable as this is a function of policy and shouldn't be delegated.</p> <p><i>Footnote 10 of Figure 7.7 should be amended to remove reference to the South Brentwood Masterplan as the role and order of the designated centre should be established by policy only. The Plan should have been informed by evidence which has tested cross-boundary impacts of installing new District Centres in close proximity to nearby centres including Laindon Town Centre and what measures will be taken in policy to limit any impact. If this evidence does not exist, the District Centre should be removed from DHGV, retaining some local centre provision to ensure DHGV can be sustainable and to enable the Plan to be effective and justified</i></p>	Noted.	The designation of the DHGV service centre(s) as a District Shopping Centre and/or Local Centre(s) is to be informed by the Masterplan Framework for DHGV and further retail evidence, and determined by a future Local Plan review. Revision to footnote 10 to be considered to add further clarity.
23972 - CEG Land Promotions Limited [5050]	Object	<p>Policy is confusing. Need to either designate and propose new centres or designate existing and proposed centres which appears to be the approach the Council is taking. In the latter scenario it is reasonable to defer the designation of the Primary Shopping Area to a later review once the centres are built. Whatever approach is adopted the way the District Shopping Centre and Local Centres are presented should be consistent with Policy R01.</p> <p><i>Policy PC08: Retail Hierarchy of Designated Centres</i></p>	Noted. The designation of the DHGV service centre(s) as a District Shopping Centre and/or Local Centre(s) is to be informed by the Masterplan Framework for DHGV and further retail evidence, and determined by a future Local Plan review.	Revision to footnote 10 to be considered to add further clarity.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23310 - Greater London Authority (Mr Jörn Peters) [6093]	Support	Any significant future changes to the town centre hierarchy within the Borough, including significant new retail/leisure development, should consider any potential impacts on town centre retail/leisure provision within London as well as on the sustainability of travel patterns.	Support Welcomed	No further action required
23803 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738]	Support	SUPPORT& COMMENT: the new village centre for West Horndon is likely to include an additional 2700sqm of retail and non-retail accommodation.	Support Welcomed	No further action required

***Figure 7.7: Brentwood Designated Centres on the Retail Hierarchy***

23973 - CEG Land Promotions Limited [5050]	Object	<p>DHGV should be added to the list of Local Centres. The centres at DHGV should be denoted as 'proposed' or a footnote added to clarify this.</p> <p><i>Figure. 7.7: Brentwood - Designated Centres on the Retail Hierarchy DHGV should be added to the list of Local Centres. The centres at DHGV should be denoted as 'proposed' or a footnote added to clarify this. Footnote no. 10 should be amended to state the Primary Shopping Areas will be designated in a Local Plan review. Paragraph 7.54 iv. should be redrafted to ensure consistency with Policy R01 and Policy PC08.</i></p>	Noted.	No change.
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Figure 7.7: Brentwood Designated Centres on the Retail Hierarchy

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23116 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>We cannot determine from Brentwood's published evidence as to what assessments have been carried out to determine the likely impact of installing new District Centres in West Hordon or DHGV on Laindon Town Centre which is 2km from DHGV and one stop from West Hordon station. Laindon Town Centre is undergoing a multi-million pound regeneration. Footnote 10 which states that the designation of the DHGV service centre(s) as a District Shopping Centre and/or Local Centre(s) and any PSA could be altered by the South Brentwood Masterplan is not acceptable as this is a function of policy and shouldn't be delegated.</p> <p><i>Footnote 10 of Figure 7.7 should be amended to remove reference to the South Brentwood Masterplan as the role and order of the designated centre should be established by policy only. The Plan should have been informed by evidence which has tested cross-boundary impacts of installing new District Centres in close proximity to nearby centres including Laindon Town Centre and what measures will be taken in policy to limit any impact. If this evidence does not exist, the District Centre should be removed from DHGV, retaining some local centre provision to ensure DHGV can be sustainable and to enable the Plan to be effective and justified.</i></p>	Noted. The designation of the DHGV service centre(s) as a District Shopping Centre and/or Local Centre(s) is to be informed by the Masterplan Framework for DHGV and further retail evidence, and determined by a future Local Plan review.	Revision to footnote 10 to be considered to add further clarity.
<i>POLICY PC09: BRENTWOOD TOWN CENTRE</i>				
22410 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Linkages to Brentwood station should include all modes of sustainable transport, currently passenger transport is not included.</p> <p><i>Amend Policy PC09 Criterion I. b. as follows - '...with priority given to passenger transport, pedestrian...'</i></p>	Noted.	Additional wording to be considered.

## POLICY PC10: MIXED USE DEVELOPMENT IN DESIGNATED CENTRES

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY PC10: MIXED USE DEVELOPMENT IN DESIGNATED CENTRES</i></b>				
23916 - McDonalds Restaurants LTD [8345] 23918 - McDonalds Restaurants LTD [8345] 23919 - McDonalds Restaurants LTD [8345] 23920 - McDonalds Restaurants LTD [8345]	Object	We have considered proposed Policy PC10 - Mixed Use Development in Designated Centres - with regard to the principles set out within the Framework. We fully support the policy's aim of promoting healthier living and tackling obesity. However, the proposed policy approach is unsound and fails to provide an evidence-based way of achieving the policy's objective. It has also been found unsound by several planning inspectors. It is too restrictive and prevents local planning authorities from pursuing more positive policy approaches. The London Borough of Waltham Forest has had such a policy in place for over a decade and its application has proven ineffective in tackling obesity to date. Within these broad points we have the following policy objections to draft Policy PC10: A. The 400m exclusion zone is inconsistent with national planning policy B. The policy is inconsistent, discriminatory and disproportionate. C. Examination of other plans have found similar policy approaches to be unsound. D. There needs to be further exploration into policies that are more positive, have a reputable evidence base and that comply with the Framework.  <i>Remove Policy PC10 from plan</i>	Noted.	No change.
23921 - McDonalds Restaurants LTD [8345]	Object	In summary, Planware Ltd consider there is no sound justification for a policy such as Policy PC10, Point D, which imposes a blanket ban on restaurants that include an element of A5 use "proposals for new hot food takeaways (use class A5) within 400m walking distance from the entrance points of primary or secondary schools will be restricted in order to promote the health and well-being of school pupils." Point D is unsound it should be deleted from the plan.  <i>Remove Policy PC10 from plan</i>	Noted. The justification for criterion D, Policy PC10 is set out in the supporting text. The Council is committed to ensuring all new developments promote healthier and inclusive environments, as set out in Policy SP03 Health Impact Assessment.	No change.

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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*POLICY PC14: PROTECTING AND ENHANCING COMMUNITY ASSETS*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24672 - Mr Eric John Webb [1830]	Object	<p>I strongly supported the community in making and keeping this a happy and pleasure place to live in: fighting to maintain the library, The continued designation of the Bull as a Public House-(now a Community Asset) and the denial of planning agreement for the Travellers on the Oak Tree Farm Plot 3 and Wenlock Meadow.</p> <p>I - like many others - could recognise the validity of the 2016 LOP proposals but the latest (Reg 19) proposals run contrary to that in both the proposals for Plots R25 and R26 and the suggestion to recognise Plots - Oak Tree Farm. NONE-OF THIS IS JUSTIFIED OR APPROPRIATE. It is therefore UNSOUND in addition to being not justified and - In view of other very local developments in Epping Forest (in Nine Ashes Road and Fingrith H.-11 Lane- all of which use and overstress facilities in Blackmore - not compliant with the duty to cooperate.</p> <p><i>* A clear need for the proposals to be reconsidered as part of a new 'strategy' for the Villages (Including Blackmore) in the North of the borough/North of Brentwood town. * Proper and appropriate consultation with Epping Fortes District Council to ensure that these developments on the boundaries or the two boroughs are appropriately addressed with capable, sustainable integrated plans. [30+ houses in Fingrith Hall lane+ 4 pairs of semi's on former Nine Ashes Farm affect Blackmore I And more are being developed In King Street on the pub site] * Proper consideration to alternative sites in the Village- Brown field Red Rose Farm, or the area -Stondon or re-Inclusion of Honey Pot Lane. These are either more suitable or more sustainable or both. * Housing needs In the area do not require this density development- assign more to other areas.* Perform a proper and appropriate Housing Need Survey and rely on the outcome of that. * Do not propose access to/egress from sites (such as R25 and R26 on roads entirely unsuitable for it.* Do not propose developments In a place (Blackmore R25 and R26) where there is already a severe flooding problem which h the development will worsen and no mitigation proposal in the plans. * Respect results of prior planning enquiries which found that Traveller pitches Plot 3 oak Tree Farm were not appropriate. Likewise no not recognise Plots 1 and 2 which were previously not approved for</i></p>	Noted.	No change.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		entirely appropriate reasons.		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23878 - Ms. Isobel McGeever [7286]	Object	<p>A property can only be released for disposal or alternative use by NHSPS once Commissioners have confirmed that it is no longer required for the delivery of NHS services. NHSPS estate code requires that property to be disposed of is first listed on e-PIMS, the central database of Government Central Civil Estate properties and land, which allows other public sector bodies to consider their use for it. The ability of the NHS to continually review the healthcare estate, optimise the use of land, and deliver health services is crucial. Therefore, policy PC14 should not be required of NHS facilities.</p> <p><i>Should any part of the Brentwood Community Hospital site be declared as surplus to the operational healthcare requirement of the NHS in the future, then the site should be considered suitable and available for alternative use, and considered deliverable within the period 5-10 years. These representations identify the sites potential for future development, in accordance with the realignment of the Green Belt so that this significant area of development land is no longer included. It is evident, that the site does not make a positive contribution towards the purposes of the Green Belt set out in the NPPF. Accordingly, redevelopment of the site could provide a key contribution to Brentwood's housing need, which the Council have failed to justify, given the reliance on key strategic sites, and the lack of acknowledgement for unmet need arising from neighbouring authorities (Basildon and Havering). These representations therefore promote and identify parts of the Brentwood Community Hospital site as a suitable site to contribute towards these requirements. This site presents an excellent opportunity for a high quality residential redevelopment on previously developed Green Belt land. This could be achieved without compromising the character of the area as the development can act as an infill site to the existing residential development surrounding it, and without the need for significant infrastructure. Furthermore, the site is also available to accommodate further health related development should the CCG seek to expand their services in this location, including the possible expansion of the hospital to provide more comprehensive services for the community. However, the site's Green Belt designation would make it</i></p>	Noted.	No action.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
		<i>difficult for any planning application proposing additional built form to provide further healthcare services to be considered acceptable. The subject site is considered available, suitable and deliverable within the 5-10 year period of the plan.</i>		
22524 - The Theatres Trust (Mr Tom Clarke MRTPI) [302]	Support	The Trust is supportive of this policy, which provides protection for Brentwood's valued community, cultural and social facilities and is reflective of NPPF paragraph 92.	Support Welcomed	No further action needed
22379 - Sport England (Mr. Roy Warren) [4294]	Support	This policy is supported as it seeks to protect existing community assets that would include sport and active recreation facilities while supporting the principle of the development of community facilities that would meet a strategic/local need or would allow co-location/rationalisation. This broad approach would accord with Government policy in section 8 of the NPPF and the Council's evidence base in the Built Facilities Strategy and Playing Pitch Strategy for instance.	Support Welcomed	No further action required

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY PC15: EDUCATION FACILITIES</i></b>				
22411 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Policy PC15 F as currently proposed allows for provision of educational facilities in Green Belt to be looked upon favourably. Chelmsford City Council's (CCC) Local Plan EIP Inspector's view that education and community use is inappropriate development in Green Belt generally accepted. CCC suggested Main Modification (Examination Hearing Statement - Matter 9 - The Environment) to comply with NPPF (paragraphs 143 &amp; 145), which deleted the criterion and amended the supporting text. Recommend criterion F of Policy PC15 be deleted and supporting text is inserted/amended within Green Belt section of Local Plan.</p> <p><i>Delete criterion F of Policy PC15, and insert the following wording after paragraph 7.103 - The Council acknowledges that due to the extent of the Green Belt in Brentwood there may be instances where new buildings related to community or educational uses may be proposed e.g. a new village hall, ancillary buildings related to an existing school. In accordance with the NPPF, these types of uses will be considered inappropriate development. However, the locational need for these types of uses will be given appropriate weight when considering whether there are very special circumstances that weigh in favour of the proposals.</i></p>	Noted.	TBC.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22381 - Sport England (Mr. Roy Warren) [4294]	Object	<p>Objection is made to criterion (c) of part A of the policy as it would allow in principle the change of use or redevelopment of an educational playing field if it could be demonstrated that the area of the site is in excess of Government guidelines for playing field provision. This approach is contrary to both the Council's evidence base and Government policy in paragraph 97 of the NPPF. Objection is also made to the policy as while the reasoned justification encourages education providers to share their assets with the community, this is not reflected in the policy itself.</p> <p><i>To address these objections, the following amendments should be made to the policy: * Criterion (c) of section A is replaced with a criterion along the lines that that playing fields are either retained for community use or replaced in accordance with policy BE23; * An additional criterion is added to the policy which expects new educational establishments to be planned and designed to allow use by the community when not required for educational use and which encourages developments on existing establishments to facilitate new or increased community access.</i></p>	Noted.	Revision to be considered.
23867 - Brentwood School [2575]	Object	<p>Unnecessary to have the additional wording that relates to the ECC's Developer's Guide to Infrastructure Contributions. If the proposals are clearly associated with education requirements which will be a matter of fact and degree then there is no need to turn to other schedules. Furthermore the link to the Essex County Council document does not provide a clear schedule of criteria to which the decision maker or applicant can turn. It is confusing and should be deleted. In addition, Under Policy B, delete the word 'demonstrable' before need.</p> <p><i>The link to the Essex County Council document does not provide a clear schedule of criteria to which the decision maker or applicant can turn. It is confusing and should be deleted. In addition, under Policy B, delete the word 'demonstrable' before need. We would recommend that the policy should now read "Where there is a need for new educational facilities, planning permission will be granted for appropriate and well-designed proposals."</i></p>	<p>Noted. The purpose of Essex County Council's Developer's Guide to Infrastructure Contributions is to explain the scope and range of contributions towards infrastructure, including education provision, which Essex County Council may seek in order to make development acceptable in planning terms. The Developer's Guide to Infrastructure Contributions (published in January 2016) was assigned material weight when determining planning applications and can assist the Council in negotiating contributions required for necessary infrastructure.</p>	No change.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>7.94</i>				
22412 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	Request additional wording to be inserted to include childcare to paragraphs 7.94 to ensure that the full range of education provision is considered.  <i>Amend paragraph 7.94 to read as follows - Education in this section relates to early years and childcare, primary....',</i>	Noted.	Additional wording to be considered.
<i>7.97</i>				
22413 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	Request additional wording to be inserted to include childcare to paragraphs 7.97 to ensure that the full range of education provision is considered.  <i>Amend first sentence of paragraph 7.97 to read as follows - '...early years and childcare and school place planning.</i>	Noted.	Additional wording to be considered.
<i>7.101</i>				
22414 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	The supporting text to Policy PC 15 should also include reference to Post 16 education and skills to ensure the full range of education provision is considered.  <i>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.</i>	Noted	Revision to supporting text to be considered.

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22276 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Request additional paragraphs to be inserted at the end of this section to ensure that the full range of education provision is considered.</p> <p><i>Insert the following paragraph at the end of the Education and Schools section (paras 2.49-2.51), and 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 i.e. 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.</i></p>	Noted.	Additional paragraphs to be considered.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>Chapter 8. Natural Environment</b>				
<b>8.1</b>				
22241 - Mr Anthony Cross [4376]	Object	<p>Inclusion of site allocations R25 and R26 in the LDP are inappropriate, unsound and not compliant with legal requirements on the following grounds: failure to prove that more suitable (brownfield) sites do not exist in the borough, or that other site allocations couldn't absorb the 70 dwellings proposed; inadequate consultation with Epping Forest District Council and failure to properly consider the impact of other nearby developments on Blackmore; failure to recognise the increased flood risk resulting from the proposed development; adverse impact on roads, noise levels and safety of existing road users from increased traffic; inadequate local amenities/services; other considerations per full representation.</p> <p><i>Removal of proposed developments R25 and R26 from the plan and reallocation of the 70 dwellings to more suitable brownfield sites in the borough.</i></p>	Noted	No change
22605 - Dr Philip Gibbs [4309]	Object	<p>Dunton Hills is an important unspoilt area for wildlife an biodiversity and should be conserved as required by legislation protecting wildlife habitats and national planning policy. An impact study should have been done before taking a decision to allow development here.</p> <p>Changes to Plan: remove Dunton Hills site from spacial strategy</p> <p><i>Remove Dunton Hills site from spatial strategy</i></p>	Noted	No change
<b>8.3</b>				
22553 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	<p>Support for the continued creation of the Thames Chase Community Forest should be referenced in this section alongside the Essex Wildlife Trust's Living Landscapes concept.</p> <p><i>Ensure Thames Chase Community Forest remains in this section</i></p>	Welcomes support for the reference to the Thames Chase Community Frest	No further change



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>8.5</b>				
25953 - Mr Ben Holmes [8654]	Object	UN SOUND: Brownfield sites should be chosen before green belt. The flooding of a few years ago has improved , development would cause more problems. Blackmore school would be unable to cope with this amount of development. Waiting times for appointments to see local doctors would be prolonged <i>Remove R25 and R26 from plan</i>	Noted	No change
22415 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	Additional wording requested to ensure consideration of connectivity for wildlife and people in line with paragraph 91 of the NPPF. <i>Add the following wording to the end of paragraph 8.5 - with a commitment to improving connectivity for wildlife and people e.g. Green and Blue Infrastructure and Open Space policies.</i>	Noted	No change
22554 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	Community Forests are referenced in the 25 Year Environment Plan. The Thames Chase Community Forest plays a key role in this section. The Thames Chase Plan has direct synergy with the 25 Year Environment Plan. <i>Refer to the Thames Chase Community Forest</i>	Support Welcomed	Consider referring to the Thames Chase Community Forest
<b>8.9</b>				
25823 - Mrs Carol Holmes [4693] 25915 - Mr Luke Holmes [8652] 25923 - Miss Ami Holmes [8653] 25961 - Mr Mark Holmes [8655] 26045 - Mrs Nicola Holmes [8668]	Object	UN SOUND: The flooding of a few years ago has just been alleviated this would cause more problems in that area. Blackmore would be unable to cope with this amount of development. We already have waiting lists for appointments to see local doctors. The parking is already a problem. <i>To remove Blackmore from this list of proposed sites</i>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>8.11</b>				
22416 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	Additional wording requested to ensure consistency with paragraph 175 of the NPPF.	Noted.	Consider an additional paragraph following 8.11 which reads: The borough also contains irreplaceable habitats such as ancient woodland, ancient and veteran trees and lowland fen. These habitats would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity.
<p><i>Add an additional paragraph after paragraph 8.11 with the following words:</i></p> <p><i>The borough also contains irreplaceable habitats such as ancient woodland, ancient and veteran trees and lowland fen. These habitats would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity.</i></p>				
<b>Protecting and Enhancing Natural Heritage</b>				
22533 - Holmes & Hills LLP (Mr Michael Harman) [8074] 22872 - Holmes & Hills LLP (Mr Michael Harman) [8074] 22873 - Holmes & Hills LLP (Mr Michael Harman) [8074]	Object	Brentwood Borough Council has failed to demonstrate that the required housing need cannot be met on existing previously developed land/sites in existing urban areas or by increasing densities on proposed allocated sites.  Without prejudice to the above contention, if no previously developed land/sites in existing urban areas or by increasing densities on proposed allocated sites exist, that Brentwood Borough Council has failed to demonstrate there are no or insufficient previously developed sites available outside the existing urban areas.  In any event, there are greenfield sites available (for example adjoining existing urban areas) in preferable and more sustainable locations.	Noted	No change
<i>Remove sites R25 and R26 from plan</i>				

## POLICY NE01: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY NE01: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT</i></b>				
24512 - Mrs Terri Reed [4303]	Object	<p>The sites are unsuitable for building, they are liable to flood and the road is not suitable as it is too narrow &amp; also it regularly floods, cars get trapped. I am unaware if a housing need survey is being carried out. The infrastructure is already at bursting point. Children turned away from the local school as full; Drs surgery over stretched already; no parking in village centre. Because we are on the Brentwood borders, no account has been taken of the development being undertaken by Epping &amp; Chelmsford RIGHT ON OUR DOORSTEP, impacting on local facilities. Alternative sites have been ignored, even when more suitable, inadequate public transport - you can't live here without a car. Most families have 2 or more.</p> <p><i>Remove sites R25 and R26. Consider what Blackmore really needs not what ticks a few boxes, and what suits developers. The BHVA have worked hard to proposal alternative which are sustainable. They know the village better than the people behind the unsustainable proposal currently on the table.</i></p>	Noted	No change
22417 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>4. Consistent with National Policy.</p> <p>Additional wording requested to ensure consistency with paragraph 175 of the NPPF.</p> <p><i>Change D. a. to read as follows:</i></p> <p><i>'...ecological survey and assessment as....'</i></p>	Noted	No change

## POLICY NE01: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24049 - Croudace Strategic Ltd [2656]	Object	Wholly supports the principles of both NE09 and NE03; albeit as presently worded, they both contain contradictory requirements: Policy NE01 (para B) states that proposals that lead to deterioration or loss of the Borough's designated and non-designated biodiversity assets will not be permitted; whereas Policy NE01 (para C) goes on to state that where adverse impacts are unavoidable they must be adequately and proportionally mitigated (ie it appears to allow for deterioration where they are unavoidable and can be suitably mitigated). Policy NE03 (para A) contains a similar contradictory approach to the provisions of the remainder of the policy.  <i>Clarify NE09, NE03 and NE01</i>	Noted	No change
23303 - Natural England (Ms Louise Oliver) [8299]	Support	Policy is in accordance with national planning guidance and the Habitats Regulations through seeking to protect, conserve and enhance the natural environment.  <i>No change proposed</i>	Support welcomed	No further action
<b>8.16</b>				
22555 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	This section should reference the wider Thames Chase Community Forest landscape.  <i>This section should reference the wider Thames Chase Community Forest landscape.</i>	Support welcomed	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>8.19</b>				
22418 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>4. Consistent with National Policy.</p> <p>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.</p> <p>A Local Planning Authority needs certainty of impacts from development prior to the determination of planning applications.</p> <p>Paragraph 8.19 should be amended to make this clear.</p> <p><i>Amend paragraph 8.19 to read as follows - '...compensation measures and refuse planning applications. The...'</i></p>	Noted.	Consider amending paragraph 8.19 to read as follows - '...compensation measures and refuse planning applications. The...'
<b>8.22</b>				
22419 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective. Paragraph 8.22 a. makes reference to the Essex Biodiversity Plan (2011). This is no longer considered 'live' by Government.</p> <p><i>Delete a. of paragraph 8.22</i></p>	Noted	Remove the Essex Biodiversity Action Plan (2011) from the list in para 8.22.

## POLICY NE02: RECREATIONAL DISTURBANCE AVOIDANCE AND MITIGATION STRATEGY (RAMS)

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY NE02: RECREATIONAL DISTURBANCE AVOIDANCE AND MITIGATION STRATEGY (RAMS)</i></b>				
22425 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Natural England advice is that ALL residential development within RAMS Zone of Influence will need to provide mitigation and this will trigger a proportionate financial contribution.</p> <p>The Essex Rams Steering Group agreed following action at its 5th February 2019 meeting - ALL to endeavour to use policy text in Chelmsford's emerging Local Plan for RAMS so that there is consistency across all LPAs involved in Essex Coast RAMS.</p> <p>The wording was agreed in response to issues raised by Natural England (PS2078) in response to Chelmsford Draft Local Plan and was included in their Schedule of Additional Changes - June 2018.</p> <p><i>Replace Policy NE02 A. &amp; B. wording with the following -</i></p> <p><i>Where appropriate, contributions from developments will be secured towards mitigation measures identified in the Essex Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) which will be completed by the time the Local Plan is adopted. Prior to RAMS completion, the authority will seek contributions, where appropriate, from proposed residential development to deliver all measures identified (including strategic measures) through project level HRAs, or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive.</i></p>	Noted	No change
22363 - Rochford District Council (Planning Policy) [4178]	Support	<p>The Council welcomes the recognition of the Essex Coast RAMS project and acknowledges the identified need to seek financial contributions to mitigate the impact on protected habitats sites of increased recreational disturbance resulting from housing growth. The Council notes that a supplementary planning document is currently being prepared jointly by a collective of authorities, including both Rochford and Brentwood Councils. This supplementary planning document is expected to provide a robust policy mechanism for the collection of these financial contributions.</p> <p><i>No change proposed</i></p>	Support welcomed	No further action

## POLICY NE02: RECREATIONAL DISTURBANCE AVOIDANCE AND MITIGATION STRATEGY (RAMS)

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23210 - Thames Water (On behalf of Thames Water) [1927]	Support	Thames Water support the content of Policy NE2 parts D and E and encourage developers proposing developments to engage with them at an early stage to discuss the wastewater infrastructure requirements for development. The proposed policy ensures that the Local Plan is consistent with Paragraphs 20 and 41 of the NPPF. Alongside the proposed amended text for Policy SP04, the policy will help ensure the effective delivery of any sewerage network reinforcement works necessary to support development.  <i>No change proposed</i>	Support welcomed	No further action
23304 - Natural England (Ms Louise Oliver) [8299]	Support	Policy ensures any residential development that is likely to affect the integrity of those European Sites identified under the Essex RAMS, or Epping Forest SAC will be required to either contribute towards mitigation measures identified in the RAMS or, in exceptional circumstances, identify and implement bespoke mitigation measures to ensure compliance with the Habitat Regulations.  <i>No change proposed</i>	Support welcomed	No further change

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*Representations**Nature**Summary of Main Issue/Change to Plan**Council's Assessment**Action*

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8.25



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22426 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective. The Essex Rams Steering Group agreed the following action at its 5th February 2019 meeting - ALL to endeavour to use the policy text in Chelmsford's emerging Local Plan for the RAMS so that there is consistency across all LPAs involved in the Essex Coast RAMS</p> <p>The wording was agreed in response to issues raised by Natural England (PS2078) in response to Chelmsford Draft Local Plan and was included in their Schedule of Additional Changes - June 2018.</p>	Noted	<p>Consider rewording para 8.25 to read: Following consultation with Natural England, an Essex-wide Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) is being prepared to include all coastal European sites. The strategy will identify where recreational disturbance is happening and the main recreational uses causing the disturbance. New residential development that is likely to affect the integrity of the European Sites will be required to contribute towards the implementation of the mitigation. At this stage, it is considered that development allocations in this location will be required to pay for the implementation of mitigation measures to protect the interest features of European designated sites along the Essex Coast which include the Crouch and Roach Estuaries Special Protection Area, the Colne and Blackwater Estuaries SPAs and Ramsar sites and Site of Special Scientific Interest, and the Essex Estuaries Special Area of Conservation. The appropriate mechanisms will be identified in the RAMS.</p>
<p><i>Amend paragraph 8.25 as follows -</i></p> <p><i>Following consultation with Natural England, an Essex-wide Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) is being prepared to include all coastal European sites. The strategy will identify where recreational disturbance is happening and the main recreational uses causing the disturbance. New residential development that is likely to affect the integrity of the European Sites will be required to contribute towards the implementation of the mitigation. At this stage, it is considered that development allocations in this location will be required to pay for the implementation of mitigation measures to protect the interest features of European designated sites along the Essex Coast which include the Crouch and Roach Estuaries Special Protection Area, the Colne and Blackwater Estuaries SPAs and Ramsar sites and Site of Special Scientific Interest, and the Essex Estuaries Special Area of Conservation. The appropriate mechanisms will be identified in the RAMS.</i></p>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>8.27</b>				
22427 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective.</p> <p>The Essex Rams Steering Group agreed the following action at its 5th February 2019 meeting - ALL to endeavour to use the policy text in Chelmsford's emerging Local Plan for the RAMS so that there is consistency across all LPAs involved in the Essex Coast RAMS</p> <p>The wording was agreed in response to issues raised by Natural England (PS2078) in response to Chelmsford Draft Local Plan and was included in their Schedule of Additional Changes - June 2018.</p> <p><i>Change paragraph 8.27 to read as follows:</i></p> <p><i>Any residential development within the Zone of Influence of the Essex Coast RAMS is likely to affect the integrity of these European sites. The developer will be required to either contribute towards mitigation measures identified in the RAMS or, identify and implement bespoke mitigation measures at the Essex coastal Habitats Sites to ensure compliance with the Habitat Regulations.</i></p>	Noted	No change
<b><i>POLICY NE03: TREES, WOODLANDS, HEDGEROWS</i></b>				
24050 - Croudace Strategic Ltd [2656]	Object	<p>Wholly supports the principles of both NE09 and NE03; albeit as presently worded, they both contain contradictory requirements: Policy NE01 (para B) states that proposals that lead to deterioration or loss of the Borough's designated and non-designated biodiversity assets will not be permitted; whereas Policy NE01 (para C) goes on to state that where adverse impacts are unavoidable they must be adequately and proportionally mitigated (ie it appears to allow for deterioration where they are unavoidable and can be suitably mitigated). Policy NE03 (para A) contains a similar contradictory approach to the provisions of the remainder of the policy.</p> <p><i>Clarify NE09 and NE03 and NE01 for consistency.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23889 - Redrow Homes [6669]	Object	<p>The wording of this policy is such that it would prevent the loss of any tree or hedgerow within the development site. Many of the allocated sites include existing trees/hedgerows that are arguably of some value and will have some ecological value. The loss of such trees/hedgerows may be necessary to secure the satisfactory development of the site and deliver the level of development envisaged. NE03 should reflect the potential for the impact of the loss of some trees/hedgerows to be outweighed by other benefits arising from the development proposal.</p> <p><i>Amend NE03 to acknowledge that the adverse impacts arising from the loss of trees, woodlands and hedgerows will be balanced against the benefits arising from the development, especially where allocated for development. The wording of the policy can still identify a preference to retain such features within development proposals but must acknowledge the potential for some losses to be inevitable in order to deliver the site allocations or secure an otherwise satisfactory development.</i></p>	Noted.	No change
22428 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>4. Consistent with National Policy. Additional wording requested to ensure consistency with paragraph 175 of the NPPF.</p> <p><i>Amend A. to read as follows:</i></p> <p><i>'...including irreplaceable habitats such as trees, ancient woodlands or hedgerows.'</i></p>	Noted and agreed.	Amend A. to read as follows: '...including irreplaceable habitats such as trees, ancient woodlands or hedgerows.'

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Promoting a Clean and Safe Environment</i>				
22534 - Holmes & Hills LLP (Mr Michael Harman) [8074] 26094 - Mr David Holland [8676] 26121 - Mr. James Harris [8678] 26126 - Mr Adam Harris [8679] 26133 - Mrs Beverley Holla [8680] 26156 - Laura Harris [8685] 26161 - Susan Harris [8686] 26356 - Mrs Maureen Butler [5017]	Object	The local schools are struggling to cope already. More houses will increase demand. The local GP services are also struggling to cope and more homes will place even more pressure on them. The current road infrastructure will not be sufficient for more traffic. Flooding is a risk factor in the area and building more houses will aggravate this.  <i>Sites R25 and R26 should be removed from the LDP and that Planners should refer to the BVHA neighbourhood plan which clearly sets out our local housing needs as the Blackmore community is already sustainable.</i>	Noted	No change
<i>POLICY NE05: AIR QUALITY</i>				
24144 - Wiggins Gee Homes Ltd [2788]	Support	Paragraph 8.48 states as ensuring "... new development does not contribute to the worsening of air quality." However, neither the policy, nor any of the accompanying paragraphs, says much about locating new development land allocations close to existing or potential sources of air pollution. We have raised issues about air and noise pollution in relation to making development land allocations before. We note paragraph 8.50 says that "Transport generated emissions are the main source of poor air quality in the borough." In spite of this, a number of the Document's allocations are made adjacent to the A12, one of the Borough's principal sources of air pollution.  <i>We support the Policy, but would ask the Borough Council to reconsider its wording to make it simpler and clearer.</i>	Support welcomed	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24051 - Croudace Strategic Ltd [2656]	Support	Policy NE05: Air Quality seeks to restrict development, which would directly or indirectly, impact air quality within the Borough. Measures to offset or mitigate those impacts are introduced as part of proposals to ensure that receptors would not be subject to unacceptable risk as a result of poor air quality. This policy is "consistent" with the objectives of the NPPF (para 181) and is therefore considered sound.  <i>No change proposed</i>	Support noted	No further action required

***POLICY NE06: FLOOD RISK***

24052 - Croudace Strategic Ltd [2656]	Object	The majority of Policy NE06 therefore aligns with National guidance and therefore mostly sound. However, and as presently worded, it suggests that applicants may be obligated to set aside land to provide flood management to benefit areas outside of that development. This is unduly onerous, inconsistent with National policy and therefore unsound. Similarly, the entirety of a development area does not need to remain operational at times of flood (such as access roads), if there is an alternative safe means of escape that is provided. Subsection c) of Policy NE06 is therefore not justified and also unsound.  <i>Amend policy NE06 Flood Risk in line with NPPF</i>	Noted	No change
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<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23341 - Mrs Danielle Cohen [8313] 23438 - Mr Benjamin Rumary [8324] 23474 - Mr Marc Cohen [4268] 23544 - Mr David Barfoot [7177] 23557 - Mrs Janet Barfoot [7200] 23563 - Ms Eleanora Barfoot [8328] 23570 - Mrs Hayley Hammond [8329] 23574 - Sadie Barfoot [8330] 23632 - Mr Michael Evans [8332] 24186 - Mr. David Cartwright [7193] 24188 - Mr. David Cartwright [7193] 24190 - Mr. David Cartwright [7193] 24192 - Mr. David Cartwright [7193] 24194 - Mr. David Cartwright [7193] 24199 - Mrs. Margaret Cartwright [7195] 24204 - Mrs. Margaret Cartwright [7195] 24211 - Mrs. Margaret Cartwright [7195] 24217 - Mrs. Margaret Cartwright [7195] 24223 - Mrs. Margaret Cartwright [7195] 24229 - Mr Callum Cartwright [8370] 24235 - Mr Callum Cartwright [8370] 24241 - Mr Callum Cartwright [8370] 24247 - Mr Callum Cartwright [8370] 24432 - Mr Kevin Joyner [8375] 24433 - Mr Kevin Joyner [8375] 24440 - Mrs Vicky Mumby [8378] 24459 - Mr Mark Mumby [8379] 24513 - Mrs Terri Reed [4303]	Object	The entire village is prone to severe flooding, and sites and access to the R25 and R26 are both liable to flood. Building on this land will only increase the flood risk elsewhere in the village.	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24524 - Mrs Diane Smith [8388]				
24554 - Mrs Angela Taylor [8392]				
24579 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]				
24611 - Mr Pete Vince [8123]				
24616 - Mr Lyall Vince [8403]				
24628 - Mr Nicholas Wilkinson [8406]				
24652 - Mrs Karen Wood [8411]				
24663 - Mrs Edna Williams [4728]				
24673 - Mr Eric John Webb [1830]				
24694 - Mr Desmond Temple [8420]				
24767 - Mrs Angela Taylor [8442]				
24789 - Mrs Deborah Thwaite [8175]				
24818 - Mrs Susan Webb [4919]				
24823 - Mr Adrian Quick [8451]				
24829 - Mr Ronald Quested [8452]				
25049 - Mr Alan Snook [8484]				
25071 - Mrs Josephine Snook [8489]				
25503 - Mrs Melanie Simpson [8539]				
25506 - Mrs Gladys Skinner [8540]				
25532 - Mr. James Simpson [4462]				
25539 - Mrs Gillian Romang [8107]				
25546 - Mrs Alison Ratcliffe [5040]				
25551 - Mr Richard Romang [6974]				
25558 - Mrs Brigid Robinson [4897]				
25586 - Mr Simon Richardson [8562]				
25591 - Mr Clive Rosewell [8563]				
25598 - Mr Matthew Romang [8565]				
25604 - Mr David Rolfs [8566]				
25610 - Mrs Yvonne Rolfs [8567]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25622 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]				
25789 - Mrs Pamela Bailey [8010]				
25821 - Mrs Carol Holmes [4693]				
25829 - Miss Jade Hayes [8136]				
25844 - Mr John Hughes [4500]				
25854 - Mr Thomas Hughes [8637]				
25861 - Mrs Gail Hughes [8638]				
25868 - Mr Adam Hughes [8639]				
25898 - Mr Peter Birch [8158]				
25901 - Mr Peter Bartrop [8650]				
25905 - Mrs Carol Bartrop [8651]				
25913 - Mr Luke Holmes [8652]				
25921 - Miss Ami Holmes [8653]				
25928 - Mrs Lucille Foreman [8574]				
25934 - Mr Colin Foreman [4394]				
25944 - Ms Deborah Cullen [4547]				
25952 - Mr Ben Holmes [8654]				
25960 - Mr Mark Holmes [8655]				
25982 - Mr Colin Holbrook [4759]				
25990 - Mrs Janice Holbrook [4700]				
26005 - Mrs Shirley Holmes [8660]				
26026 - Mr Ken Holmes [8662]				
26043 - Mrs Nicola Holmes [8668]				
26053 - Malcolm Hurford [7304]				
26080 - Mrs Kate Hurford [4275]				
26085 - Mrs Carole Cole [8675]				
26103 - Mr James Hughes [8677]				
26176 - Mr Ken Holmes [8691]				
26231 - Mrs Danielle Cross [7016]				
26242 - Mrs Susan Capes [8702]				
26251 - Mrs Beryl Caton [8704]				
26276 - Mr Michael Williams [8706]				
26281 - Mrs Julie Ann Williams [8707]				
26324 - Mrs Sandra Wood [8720]				
26365 - Mr. Christopher Burrow [4618]				
26374 - Mrs Kim Barber [8731]				
26382 - Mr. Colin Barber [919]				



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26408 - Mrs Ella Bradley [4875] 26425 - Mrs Rachel Caward [8742] 26438 - Mr Lee Caward [8741] 26444 - Mrs Wendy Dunbar [8743] 26457 - Mr John Orbell [4805] 26461 - Mrs Karen York [8748] 26490 - Mr Surinder Panesar [8749] 26497 - Mrs Annabelle Panesar [8750]		<i>Removal of Sites R25 and R26 in Blackmore from the plan. The sites are not suitable.</i>		
22323 - Anglian Water (Mr Stewart Patience) [6824]	Support	Anglian Water is supportive of the requirements for applicants to engage with the relevant sewerage companies to demonstrate that there is capacity within the foul sewerage network or that improvements can be made prior to the occupation of the development.  <i>No change proposed</i>	Support welcomed	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23196 - Environment Agency (Mr Pat Abbott) [8308] 23198 - Environment Agency (Mr Pat Abbott) [8308]	Support	<p>Generally support this policy but believe the supporting text should stress that any proposed development should take into consideration the impacts of climate change for the development lifetime.</p> <p>Supporting text It could be added that we would object to any new development in Functional floodplain (Flood Zone 3b) as this would be against policy. Water compatible development can be allowed in Functional floodplain if, in accordance with the footnotes of Table 3: Flood risk vulnerability and flood zone 'compatibility' of the PPG, for water compatible development within Functional floodplain, the applicant has designed their development to:</p> <ul style="list-style-type: none"> <li>- remain operational and safe for users in times of flood;</li> <li>- result in no net loss of floodplain storage;</li> <li>- not impede water flows and not increase flood risk elsewhere.</li> </ul> <p><i>Text should stress that any proposed development should take into consideration the impacts of climate change for the development lifetime.</i></p> <p><i>Add that the EA would object to any new development in Functional floodplain (Flood Zone 3b) as this would be against policy. Water compatible development can be allowed in Functional floodplain if, in accordance with the footnotes of Table 3: Flood risk vulnerability and flood zone 'compatibility' of the PPG, for water compatible development within Functional floodplain, the applicant has designed their development to:</i></p> <ul style="list-style-type: none"> <li><i>- remain operational and safe for users in times of flood;</i></li> <li><i>- result in no net loss of floodplain storage;</i></li> <li><i>- not impede water flows and not increase flood risk elsewhere.</i></li> </ul>	Support welcomed	<p>Text should stress that any proposed development should take into consideration the impacts of climate change for the development lifetime.</p> <p>Add that the EA would object to any new development in Functional floodplain (Flood Zone 3b) as this would be against policy. Water compatible development can be allowed in Functional floodplain if, in accordance with the footnotes of Table 3: Flood risk vulnerability and flood zone 'compatibility' of the PPG, for water compatible development within Functional floodplain, the applicant has designed their development to:</p> <ul style="list-style-type: none"> <li>- remain operational and safe for users in times of flood;</li> <li>- result in no net loss of floodplain storage;</li> <li>- not impede water flows and not increase flood risk elsewhere.</li> </ul>
23205 - Anglian Water (Mr Stewart Patience) [6824]	Support	<p>We are supportive of the Local Plan policies relating to Drainage and flood risk (NE06 and BE08).</p> <p><i>No change proposed</i></p>	Support welcomed	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22556 - Thames Chase Trust (Mr Dave Bigden) [7196]	Support	The Thames Chase Trust is co-host of the Roding, Beam & Ingrebourne Catchment Partnership, of which Brentwood Council is a partner.  <i>No change proposed</i>	Support welcomed	No change
<hr/>				
<b>8.59</b>				
22429 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	Request amendment to paragraph 8.59 to ensure factual representation of the current position, in line with paragraph 156 of the NPPF.  <i>Insert additional sentence at end of paragraph 8.59 to read as follows - Updated Critical Drainage Areas were identified in 2018 and should be referenced and considered.</i>	Noted and agreed.	Insert additional sentence at end of paragraph 8.59 to read as follows - Updated Critical Drainage Areas were identified in 2018 and should be referenced and considered.
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<b><i>POLICY NE08: FLOODLIGHTING AND ILLUMINATION</i></b>				
23757 - St Modwen Properties PLC [5124]	Support	Support; although in respect of policy NE08 A a) we suggest that, in order to provide greater clarity as to how a decision maker should react to development proposals, it is acknowledged that employment land may well require the provision of lighting for security and operational purposes.  <i>NE 08 should acknowledge that employment land may well require the provision of lighting for security and operational purposes.</i>	Support welcomed	No change
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Green Belt and Rural Development</i>				
23165 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>Para 8.83-84: Unclear from the published methodology, as to why, having scored highly in relation to Purpose 1 and 3, DHGV is assessed as making a "moderate to high" contribution to Green Belt purposes, when there are other parcels which make high contributions towards two of the purposes have been assessed as making a "high" contribution towards Green Belt purposes. Basildon Council does not believe that the Plan has reached a justified position in respects of whether the Green Belt evidence has informed the policies. Unclear how the risk of coalescence can be adequately mitigated.</p> <p><i>The Plan should demonstrate in more detail, through a tool such as a Topic Paper, how its site selection choices have been informed by the Green Belt Study 2018 and should any inconsistencies occurs the Plan's land use allocations and justification should be changed.</i></p>	<p>Noted. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22532 - Holmes & Hills LLP (Mr Michael Harman) [8074] 22874 - Holmes & Hills LLP (Mr Michael Harman) [8074] 22875 - Holmes & Hills LLP (Mr Michael Harman) [8074] 23402 - Ms Dawn Ireland [4861] 24388 - Mr John Fowles [8373] 24805 - Heather Eltham [8449] 24839 - Donna Eaton [8455] 24908 - Jacqueline Greagsby [8465] 24927 - Kay Ginivan [8468] 25037 - Ms Jill Griffiths [5024] 25058 - Ruth Jones [8485] 25062 - Mr Steven Jacobs [4408] 25068 - Diane Jones [8488] 25161 - Iris Jones [8495] 25450 - Hazel Mills [8523] 25454 - Edward Mills [8524] 25710 - Ms Norma Jennings [5444] 26122 - Mr. James Harris [8678] 26127 - Mr Adam Harris [8679] 26134 - Mrs Beverley Holla [8680] 26157 - Laura Harris [8685] 26162 - Susan Harris [8686] 26191 - Mrs. Susan Miers [8695] 26222 - Mr John Caton [4881] 26233 - Mrs Danielle Cross [7016] 26243 - Mrs Susan Capes [8702] 26253 - Mrs Beryl Caton [8704] 26277 - Mr Michael Williams [8706] 26282 - Mrs Julie Ann Williams [8707] 26291 - Mr Neil Warner [8709] 26295 - Mrs. Gillian Warner [8710] 26352 - Mr Arthur Birch [4769] 26445 - Mrs Wendy Dunbar [8743] 26458 - Mr John Orbell [4805] 26462 - Mrs Karen York [8748] 26491 - Mr Surinder Panesar [8749]	Object	The impact of development on sites R25 and R26 and the Green Belt. Brownfield sites should be used first. Need should be met on existing previously developed land / sits in existing urban areas or by increasing densities on other proposed allocated sites. Negative impact of development on wildlife, landscape, historic village.	Noted.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Remove sites R25 and R26 from plan</i>				
<hr/>				
<i>8.80</i>				
22586 - Mr Sasha Millwood [4539]	Support	Agreed, and that is why the Green Belt must remain undeveloped and permanent.	Support welcomed	No further action required
<i>No change proposed</i>				
<hr/>				
<i>8.81</i>				
24178 - Redrow Homes (Jenny Massingham) [7948]	Object	<p>In Chapter 9 neither the text nor the individual allocations, for example RO3, Land north of Shenfield, a Green Belt site, make any reference to Green Belt boundary changes and their justification.</p> <p><i>Redrow Homes propose: 1- A new policy to follow on from Policy SP02, in Chapter 4 (Managing Growth): Alteration of Green Belt Boundaries The areas of land covered by the following policies are removed from the Green Belt: RO3, (and all others concerned) The Council has arrived at these alterations on the basis of a sequential examination of brownfield and other sites not in the Green Belt, of a review of densities of development and of discussions with neighbouring local authorities to test the scope for them meeting some of the need for housing arising in Brentwood. The exceptional circumstances that justify the alterations are the severe shortage of land not within the Green Belt and suitable for development, making it impossible for the Council to meet its housing need other than through limited alterations of Green Belt boundaries. The Council has selected sites for boundary alterations where there will be least harm to the purposes of the Green Belt. 2- A new line to be added in the sequential test set out in para 3.23 Using Land Sequentially and the table revised to focus on land types: - Brownfield land within urban areas - Greenfield land within urban areas - Brownfield land within the Green Belt - Greenfield land within the Green Belt 3- Policy NE13 (Site Allocations in the Green Belt) is altered as follows: These sites are de-allocated from the Green Belt to allow development to take place... 4- Para 8.117 is deleted.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22587 - Mr Sasha Millwood [4539]	Object	<p>National Planning Policy allows a local authority to NOT meet the "huge demand and pressure" on the grounds that to do so would damage the Green Belt. In fact, the whole point of the Green Belt is precisely to prevent urban sprawl and redirect the "demand and pressure" to other parts of the country.</p> <p><i>Commit to not altering the boundaries of the Green Belt at all, and to a blanket ban on inappropriate development on the Green Belt.</i></p>	Noted.	No change

## 8.82

24179 - Redrow Homes (Jenny Massingham) [7948]	Object	<p>In Chapter 9 neither the text nor the individual allocations, for example RO3, Land north of Shenfield, a Green Belt site, make any reference to Green Belt boundary changes and their justification.</p> <p><i>Redrow Homes propose: 1- A new policy to follow on from Policy SP02, in Chapter 4 (Managing Growth): Alteration of Green Belt Boundaries The areas of land covered by the following policies are removed from the Green Belt: RO3, (and all others concerned) The Council has arrived at these alterations on the basis of a sequential examination of brownfield and other sites not in the Green Belt, of a review of densities of development and of discussions with neighbouring local authorities to test the scope for them meeting some of the need for housing arising in Brentwood. The exceptional circumstances that justify the alterations are the severe shortage of land not within the Green Belt and suitable for development, making it impossible for the Council to meet its housing need other than through limited alterations of Green Belt boundaries. The Council has selected sites for boundary alterations where there will be least harm to the purposes of the Green Belt. 2- A new line to be added in the sequential test set out in para 3.23 Using Land Sequentially and the table revised to focus on land types: - Brownfield land within urban areas - Greenfield land within urban areas - Brownfield land within the Green Belt - Greenfield land within the Green Belt 3- Policy NE13 (Site Allocations in the Green Belt) is altered as follows: These sites are de-allocated from the Green Belt to allow development to take place...4- Para 8.117 is deleted.</i></p>	Noted.	No change
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>8.83</b>				
24180 - Redrow Homes (Jenny Massingham) [7948]	Object	<p>In Chapter 9 neither the text nor the individual allocations, for example RO3, Land north of Shenfield, a Green Belt site, make any reference to Green Belt boundary changes and their justification.</p> <p><i>Redrow Homes propose: 1- A new policy to follow on from Policy SP02, in Chapter 4 (Managing Growth): Alteration of Green Belt Boundaries The areas of land covered by the following policies are removed from the Green Belt: RO3, (and all others concerned) The Council has arrived at these alterations on the basis of a sequential examination of brownfield and other sites not in the Green Belt, of a review of densities of development and of discussions with neighbouring local authorities to test the scope for them meeting some of the need for housing arising in Brentwood. The exceptional circumstances that justify the alterations are the severe shortage of land not within the Green Belt and suitable for development, making it impossible for the Council to meet its housing need other than through limited alterations of Green Belt boundaries. The Council has selected sites for boundary alterations where there will be least harm to the purposes of the Green Belt. 2- A new line to be added in the sequential test set out in para 3.23 Using Land Sequentially and the table revised to focus on land types: - Brownfield land within urban areas - Greenfield land within urban areas - Brownfield land within the Green Belt - Greenfield land within the Green Belt 3- Policy NE13 (Site Allocations in the Green Belt) is altered as follows: These sites are de-allocated from the Green Belt to allow development to take place...4- Para 8.117 is deleted.</i></p>	Noted	No change



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>8.84</b>				
22585 - Mr Sasha Millwood [4539]	Object	<p>The definition of "brownfield" land is too loose. For example, the former site compound around J29 of the M25 was always supposed to be only temporary, yet the Council has used that as a justification to label it "brownfield". Whilst I agree that brownfield sites should be developed in preference to greenfield sites, the definition of "brownfield" must be far more constrained, and must not include open spaces such as sports pitches.</p> <p><i>Restrict the definition of "brownfield" to sites which have genuinely already had heavy development, and exclude sports pitches, temporary site compounds, and other developments which do not currently encroach on the "open" nature of the Green Belt.</i></p>	Noted.	No change
24143 - Wiggins Gee Homes Ltd [2788]	Object	<p>The paragraph says that after giving priority to brownfield sites and what it refers to as "previous development land", it has been necessary to review Green Belt boundaries, resulting in the release of some 1% of the District's Green Belt land for development. In the context of paragraph 8.84, it is not clear what is meant by "previous development land". It could mean one of three things:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> allocations made in the existing Local Development Plan that have not yet been developed</li> <li><input type="checkbox"/> major developed sites in the Green Belt</li> <li><input type="checkbox"/> brownfield land also referred to as previously developed land.</li> </ul> <p>We are assuming it means the first of these. We believe that a number of allocations made in the Pre-Submission Document are unsound for reasons that are set out in our representations on both the overall growth strategy and individual allocations. The balance between allocations in areas outside the Green Belt and in the Green Belt is unsound. It should be corrected by releasing a larger percentage of Green Belt land.</p> <p><i>The sentence in paragraph 8.84 beginning: "These exceptional circumstances have resulted in a 1% release of land from the Green Belt ..." should be altered to read: "These exceptional circumstances have resulted in a 1.5% release of land from the Green Belt ...".</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24181 - Redrow Homes (Jenny Massingham) [7948]	Object	<p>In Chapter 9 neither the text nor the individual allocations, for example RO3, Land north of Shenfield, a Green Belt site, make any reference to Green Belt boundary changes and their justification.</p> <p><i>Redrow Homes propose: 1- A new policy to follow on from Policy SP02, in Chapter 4 (Managing Growth): Alteration of Green Belt Boundaries The areas of land covered by the following policies are removed from the Green Belt: RO3, (and all others concerned) The Council has arrived at these alterations on the basis of a sequential examination of brownfield and other sites not in the Green Belt, of a review of densities of development and of discussions with neighbouring local authorities to test the scope for them meeting some of the need for housing arising in Brentwood. The exceptional circumstances that justify the alterations are the severe shortage of land not within the Green Belt and suitable for development, making it impossible for the Council to meet its housing need other than through limited alterations of Green Belt boundaries. The Council has selected sites for boundary alterations where there will be least harm to the purposes of the Green Belt. 2- A new line to be added in the sequential test set out in para 3.23 Using Land Sequentially and the table revised to focus on land types: - Brownfield land within urban areas - Greenfield land within urban areas - Brownfield land within the Green Belt - Greenfield land within the Green Belt 3- Policy NE13 (Site Allocations in the Green Belt) is altered as follows: These sites are de-allocated from the Green Belt to allow development to take place...4- Para 8.117 is deleted.</i></p>	Noted	No change
<i>Purpose of the Green Belt</i>				
23711 - Ms Heather Dunbar [8337] 23822 - Sow & Grow Nursery (Mr. Derek Armiger) [303] 23838 - Sow & Grow Nursery (Ms Kim Armiger) [4657] 23856 - Ms Maxine Armiger [4656]	Support	<p>The release from the Green Belt and Green Belt policy is supported. Particularly regarding site R07</p> <p><i>No change proposed</i></p>	Support welcomed	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>8.85</b>				
24434 - Mr Kevin Joyner [8375] 25822 - Mrs Carol Holmes [4693] 25831 - Miss Jade Hayes [8136] 25914 - Mr Luke Holmes [8652] 25922 - Miss Ami Holmes [8653] 25954 - Mr Ben Holmes [8654] 25962 - Mr Mark Holmes [8655] 26006 - Mrs Shirley Holmes [8660] 26027 - Mr Ken Holmes [8662] 26044 - Mrs Nicola Holmes [8668] 26054 - Malcolm Hurford [7304] 26081 - Mrs Kate Hurford [4275] 26104 - Mr James Hughes [8677] 26328 - Mrs Sandra Wood [8720] 26366 - Mr. Christopher Burrow [4618] 26426 - Mrs Rachel Caward [8742] 26437 - Mr Lee Caward [8741]	Object	The plan is not sound. Blackmore as a village does not have the resource or infrastructure to even support a development of this scale. The roads are far too narrow to allow access on such a huge scale and the limited resources of schools and streets will not be able to cope. It appears consideration has not been given to other alternative available to the council.	noted	no change
<p><i>Site R25 and R26 should be removed from the LDP and Planners should refer to the BVHA Neighbourhood Plan which clearly sets out our local housing needs, for our already sustainable community. Consideration has not been given to the BVHA Neighbourhood plan. Also further review must take place regarding impacts and other developments in progress and brownfield opportunities.</i></p>				

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
8.87 22315 - Essex Bridleways Association (Mrs Sue Dobson) [3855]	Object	<p>Para 8.87 Green Belt Local Context: this paragraph acknowledges the benefits of the Thames Chase Community Forest and how it provides informal recreation, and we note that the Council intends to support and encourage this use. We would therefore like to see more clarity in this justification; where the aspiration to improve access is mentioned we would prefer to see this made accessible to more user groups than at present, specifically equestrians and cyclists as far as possible.</p> <p><i>To make this Plan sound, we would like to see the aspiration to enhance accessibility to the Thames Chase Community Forest to include ALL user groups, including equestrians and cyclists.</i></p>	Noted	No change

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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8.90

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26055 - Malcolm Hurford [7304]	Object	<p>The local plan does not fulfil the following NPPF requirements (by paragraph number): 8.a.b.c - to meet local need, accessible services. 28 the views of the local community have not been included in production of the plan. 77/78 There is no proven need for these houses. 103 This development of 70 houses will rely on private cars for transport being at least 7 miles from the nearest rail stations being accessed via local rural lanes. The limited bus services are not supportive of employment during normal working hours. Sect 14 -area known locally to flood although no focused flood risk assessment has been carried out. History of flooding shows both Chelmsford Road and Redrose Lane become impassable during heavy rainfall. 174/175 - to protect and enhance biodiversity. Section 16 - R25 and R26 have two Grade 2 listed buildings on the boundary of the development. Redrose Lane being the point of access for both developments is signed by the Highways authority as "Not suitable for heavy goods vehicles". This lane has been assessed by the local community by way of the procedure used in the Brentwood Borough Council Protected Lanes report.</p> <p><i>Consultation required with neighbouring authorities this would show several developments that would impact on local services in Blackmore and cater for some local housing needs. Location needs to be re-assessed. There is no prove that Blackmore needs this number of houses being distant from transport links and there being little or no local employment. Detailed flood risk analysis required - to identify suitable locations out of flood risk areas. The historic lanes in and around Blackmore should be assessed to the established procedure and allocated "Protected Lane" status where they meet the necessary requirements. Assess possibility of smaller scale brownfield developments - support a policy of partnering owners of brownfield sites to develop local area needs where proven. Re-assess the development of sites around the transport hubs (Brentwood, Dunton, etc.) to cater for the Borough's housing needs and reduce the demands on the already stretched rural infrastructure to the north of Brentwood. Develop a strategic approach to the Villages north of Brentwood by consultation with the local community.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25832 - Miss Jade Hayes [8136] 26007 - Mrs Shirley Holmes [8660] 26028 - Mr Ken Holmes [8662] 26082 - Mrs Kate Hurford [4275] 26105 - Mr James Hughes [8677] 26329 - Mrs Sandra Wood [8720] 26367 - Mr. Christopher Burrow [4618] 26427 - Mrs Rachel Caward [8742] 26436 - Mr Lee Caward [8741]	Object	<p>Failure to comply with the NPPF by setting out strategic policies to deliver the conservation and enhancement of the natural and historic environment, including landscape. No 'positive strategy for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk. Assets should be recognised as being an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' that conservation can bring, whilst also recognising the positive contribution new development can make to local character and distinctiveness.</p> <p><i>A fully evidenced survey of the suitability of these proposed sites is required taking into account the obligations of the local authority to protect green belt and the heritage assets in Blackmore village. Detailed flood risk analysis is required. Assess fully any available or new currently unknown brownfield sites in more suitable locations. Meaningful consultation with neighbouring authorities namely Chelmsford to consider the suitability of unmet housing needs being covered with an agreement with other authorities. Evidence and develop a strategic approach for the north of the borough</i></p>	Noted	No change

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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*POLICY NE9: GREEN BELT*



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24024 - Ms. Isobel McGeever [7286]	Object	<p>The redevelopment of the Brentwood Community Hospital site would only seek for the removal of a small element of existing Green Belt land which is currently a mix of hardstanding car parking and woodland. This removal would enable efficient and maximum redevelopment of a brownfield site, without contradicting the purposes of the Green Belt. The NPPF states that Green Belt boundaries should only be amended in "exceptional circumstances". The Housing White Paper seeks to clarify this further and states that land which has been previously developed should be considered first. Therefore, the 25% of the Brentwood Community Hospital which currently lies within the green belt should be removed to permit future development as it does not preform the five purposes of greenbelt as support by the Council Green Belt Assessment.</p> <p><i>Should any part of the Brentwood Community Hospital site be declared as surplus to the operational healthcare requirements of the NHS in the future, then the site should be considered suitable and available for alternative use, and considered deliverable within the period 5- 10 years. These representations identify the sites potential for future development, in accordance with the realignment of the Green Belt so that this significant area of developed land is no longer included. It is evident, that the site does not make a positive contribution towards the purposes of the Green Belt set out in the NPPF. Accordingly, redevelopment of this site could provide a key contribution to Brentwood's housing need, which the Council have failed to justify, given the reliance on key strategic sites, and the lack of acknowledgement for unmet need arising from neighbouring authorities (Basildon and Havering). These representations therefore promote and identify parts of the Brentwood Community Hospital site as a suitable site to contribute towards these requirements. This site presents an excellent opportunity for a high quality residential redevelopment on previously developed Green Belt land. This could be achieved without compromising the character of the area as the development can act as an infill site to the existing residential development surrounding it, and without the need for significant infrastructure. Furthermore, the site is also available to accommodate further</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p><i>health related development should the CCG seek to expand their services in this location, including the possible expansion of the hospital to provide more comprehensive services for the community. However, the site's Green Belt designation would make it difficult for any planning application proposing additional built form to provide further healthcare services to be considered acceptable. The subject site is considered available, suitable and deliverable within the 5-10 year period of the plan.</i></p>		
25971 - Mrs Beryl Caton [8657]	Object	<p>There is no local housing need survey for Blackmore, there is no clear strategy for villages and has not considered brownfield sites which should be prioritised over Green Belt sites, this is developer led and not thought through by BBC, ignored adjacent authority development, access via Red Rose lane is unsuitable, the number of homes will overwhelm village - school and GP. Parking already a problem and shops, cafes, pubs already insufficient. Extend the urban development to Brentwood town instead.</p> <p><i>Sites R25 and R26 should be removed from the LDP. In accordance with local needs smaller homes could be allowed which would give existing residents the chance to down size releasing their larger homes.</i></p>	Noted	No change
22704 - Mrs Christine Blythe [4718] 24053 - Croudace Strategic Ltd [2656] 24358 - Childerditch Industrial Estate [8371]	Support	<p>Policy NE09: Green Belt seeks that the Metropolitan Green Belt within Brentwood Borough will be preserved from inappropriate development so that it continues to main openness and serve key functions. Policy NE09 states that all development proposals within the Green Belt will be considered in accordance with the provisions of section 13 of the NPPF on "Protecting Green Belt Land". It is therefore considered that policy NE09 is "justified" and sound, in the light of national policy.</p> <p><i>No change proposed</i></p>	Support welcomed	No change proposed

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23759 - St Modwen Properties PLC [5124]	Support	It is considered necessary that the Local Plan makes clear where land is being removed from the Green Belt (such as in respect of the allocation contained in Policy E11). It is suggested that text is added to this policy to clarify that the Local Plan is altering the Green Belt boundaries.  <i>Add text to clarify where Green Belt boundaries are being altered.</i>	Support welcomed	No change
<i>POLICY NE10: NEW DEVELOPMENT, EXTENSION AND REPLACEMENT OF BUILDINGS IN THE GREEN BELT</i>				
23804 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738]	Object	West Horndon is not within green belt, so it is unclear what purpose reference to it in this policy serves.  <i>No change proposed</i>	Noted	No change
22430 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	4. Consistent with National Policy. Policy NE10 A. b. as currently proposed considers the provision of education and community uses as an exception to inappropriate development in the Green Belt. It is recommended that criterion A. b. of Policy NE10 is deleted (see earlier comments in relation to Policy PC15 - Education Facilities).  <i>Delete criterion A. b. from Policy NE10</i>	Noted	Consider removing criteria A. section b.
22382 - Sport England (Mr. Roy Warren) [4294]	Support	This policy is supported due to the exception made for the principle of new buildings/structures for outdoor sport in the Green Belt. The encouragement of the beneficial use of the Green Belt including opportunities for improving outdoor sport and recreation is also welcomed. The policy approach is considered to accord with the Government's policy approach to outdoor sport and recreation in the Green Belt in the NPPF.  <i>No change proposed</i>	Support Welcomed	NO further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>8.98</b>				
22431 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Paragraph 8.98 b. refers to new buildings or extension for education and community uses which can demonstrate a requirement for a Green belt location as an exception to inappropriate development, as set out in paragraphs 145 and 146 of the NPPF. The NPPF does not include this exception.</p> <p>It is recommended that criterion b. of paragraph 8.98 is deleted (see earlier comments in relation to Policy PC15 - Education Facilities).</p> <p><i>Delete criterion b. from paragraph 8.98.</i></p>	Noted	Consider removing point b.
<b>8.99</b>				
22432 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>It is recommended that paragraph 8.99 is amended (see earlier comments in relation to Policy PC15 - Education Facilities).</p> <p><i>Amend paragraph 8.99 as follows - The Council acknowledges that due to the extent of the Green Belt in Brentwood there may be instances where new buildings related to community or educational uses may be proposed e.g. a new village hall, ancillary buildings related to an existing school. In accordance with the NPPF, these types of uses will be considered inappropriate development. However, the locational need for these types of uses will be given appropriate weight when considering whether there are very special circumstances that weigh in favour of the proposals.</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>8.101</i>				
25824 - Mrs Carol Holmes [4693] 25833 - Miss Jade Hayes [8136] 25916 - Mr Luke Holmes [8652] 25925 - Miss Ami Holmes [8653] 25955 - Mr Ben Holmes [8654] 25963 - Mr Mark Holmes [8655] 26008 - Mrs Shirley Holmes [8660] 26029 - Mr Ken Holmes [8662] 26046 - Mrs Nicola Holmes [8668] 26330 - Mrs Sandra Wood [8720] 26368 - Mr. Christopher Burrow [4618] 26428 - Mrs Rachel Caward [8742] 26435 - Mr Lee Caward [8741]	Object	UN SOUND: Brownfield sites should be chosen before green belt. The flooding of a few years ago has improved , development would cause more problems. Blackmore school would be unable to cope with this amount of development. Waiting times for appointments to see local doctors would be prolonged.	Noted	No change
<i>To remove Blackmore R25 and R26 from this list of proposed sites</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26056 - Malcolm Hurford [7304] 26084 - Mrs Kate Hurford [4275]	Object	<p>The local plan does not fulfil the following NPPF requirements (by paragraph number): 8.a.b.c - to meet local need, accessible services. 28 the views of the local community have not been included in production of the plan. 77/78 There is no proven need for these houses. 103 This development of 70 houses will rely on private cars for transport being at least 7 miles from the nearest rail stations being accessed via local rural lanes. The limited bus services are not supportive of employment during normal working hours. Sect 14 -area known locally to flood although no focused flood risk assessment has been carried out. History of flooding shows both Chelmsford Road and Redrose Lane become impassable during heavy rainfall. 174/175 - to protect and enhance biodiversity. Section 16 - R25 and R26 have two Grade 2 listed buildings on the boundary of the development. Redrose Lane being the point of access for both developments is signed by the Highways authority as "Not suitable for heavy goods vehicles". This lane has been assessed by the local community by way of the procedure used in the Brentwood Borough Council Protected Lanes report.</p> <p><i>Consultation required with neighbouring authorities this would show several developments that would impact on local services in Blackmore and cater for some local housing needs. Location needs to be re-assessed. There is no prove that Blackmore needs this number of houses being distant from transport links and there being little or no local employment. Detailed flood risk analysis required - to identify suitable locations out of flood risk areas. The historic lanes in and around Blackmore should be assessed to the established procedure and allocated "Protected Lane" status where they meet the necessary requirements. Assess possibility of smaller scale brownfield developments - support a policy of partnering owners of brownfield sites to develop local area needs where proven. Re-assess the development of sites around the transport hubs (Brentwood, Dunton, etc.) to cater for the Borough's housing needs and reduce the demands on the already stretched rural infrastructure to the north of Brentwood. Develop a strategic approach to the Villages north of Brentwood by consultation with the local community.</i></p>	Noted.	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
26106 - Mr James Hughes [8677]	Object	<p>Some of the proposed sites in Blackmore are incredibly vital to the survival of certain types of wildlife in the English countryside -we have seen a huge decline in the hedgehog population countrywide in the last few years and the green sites around Blackmore provide a safe haven for these creatures.</p> <p><i>Due to issues I have made clear I believe it is the Council's duty to remove sites R25 and R26 from the LDP such that they do not overwhelm local amenities and services; such that they do not cause further flooding by removing crucial green spaces and such that they are not driving forward with plans that would adversely affect live in the surrounding areas. Blackmore is not an affordable area for young people trying to get on the 'property-ladder': so any attempt to provide affordable housing within that area is counter-intuitive.</i></p>	Noted	No change
<i><b>POLICY NE11: ESTABLISHED AREAS OF DEVELOPMENT AND STRUCTURES IN THE GREEN BELT</b></i>				
22433 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Policy NE11 B. as currently proposed considers the provision of education and community uses as an exception to inappropriate development in the Green Belt. The NPPF does not include this exception. It is recommended that criterion B. of Policy NE11 is deleted (see earlier comments in relation to Policy PC15 - Education Facilities).</p> <p><i>Delete criterion B. from Policy NE11.</i></p>	Noted.	No change
<i><b>POLICY NE12: PREVIOUSLY DEVELOPED LAND IN GREEN BELT</b></i>				
23890 - Redrow Homes [6669]	Object	<p>Criterion A(d) requires the provision of community benefits in order to redevelop PDL in the Green Belt. This is not a requirement set out in paragraph 145 of the NPPF and therefore it is inconsistent with national policy. Criterion A(e) requires the provision of travel links. This is a potentially onerous requirement for the scale of development that may be proposed and again is not a requirement set out in paragraph 145 of the NPPF. It is therefore inconsistent with national policy.</p> <p><i>Delete Criteria A(d) and (e) in order to comply with the NPPF.</i></p>	Noted	No change

## POLICY NE12: PREVIOUSLY DEVELOPED LAND IN GREEN BELT

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23712 - Ms Heather Dunbar [8337] 23823 - Sow & Grow Nursery (Mr. Derek Armiger) [303] 23855 - Ms Maxine Armiger [4656]	Support	Policy NE12 is supported as it would better reflect the use of previously developed land in the Green Belt.	Support welcomed	No further action
<i>No change proposed</i>				

***POLICY NE13: SITE ALLOCATIONS IN THE GREEN BELT***

23891 - Redrow Homes [6669]	Object	Criterion A of this policy requires the delivery of significant community benefits and the wording of the supporting text advises that this is to 'repay' the loss of Green Belt. The release of these sites is to meet housing needs and therefore is self-evidently provide significant community benefits. The requirement for additional provision above and beyond this suggests that the developer has a choice of sites to develop, which is clearly not the case. This requirement is therefore unreasonable, unjustified and inconsistent with national policy.  <i>delete criterion A</i>	Noted	No change
22490 - Hallam Land Management Limited [8258]	Object	In order to meet the Borough's minimum housing need and address unmet needs elsewhere, the Draft Plan should be providing more land for housing and thereby releasing more land from its Green Belt in order to promote sustainable patterns of development as required by Paragraph 138 of the Framework.  Land at Calcott Hall Farm warrants release from the Green Belt as its development would contribute towards sustainable development and meeting housing needs where they arise, without undermining the integrity of the Green Belt within the Borough. Additional land should be safeguarded to meet longer term development needs.  <i>The Plan needs to consider safeguarding land in order to meet longer term development needs.</i>	Noted	No change



## POLICY NE13: SITE ALLOCATIONS IN THE GREEN BELT

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24307 - Strutt & Parker LLP (Mr. Andy Butcher) [2741] 24333 - Strutt & Parker LLP (Mr. Andy Butcher) [2741] 24359 - Childerditch Industrial Estate [8371]	Object	It is considered that Policy NE13 should be removed from the PSLP. The criteria of the policy can be included other policies, such as the site specific policy for Childerditch Industrial Estate (Policy E12), and it is therefore not considered necessary to have a standalone policy duplicating these points. Furthermore, it is queried why the policy refers to the benefits of housing sites only and no other land uses. We welcome the PSLP's intentions to remove sites R23 and R24 from the Green Belt. This calls into question the need for Policy NE13. The requirements set out by criterion A and B are dealt with by other policies in the Plan. If there are site specific requirements relating to sites, these should be covered within the specific policies relating to those sites.  <i>Delete Policy NE13</i>	Noted	No change

## POLICY NE13: SITE ALLOCATIONS IN THE GREEN BELT

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23342 - Mrs Danielle Cohen [8313] 23439 - Mr Benjamin Rumary [8324] 23475 - Mr Marc Cohen [4268] 23546 - Mr David Barfoot [7177] 23558 - Mrs Janet Barfoot [7200] 23567 - Ms Eleanora Barfoot [8328] 23571 - Mrs Hayley Hammond [8329] 23575 - Sadie Barfoot [8330] 23633 - Mr Michael Evans [8332] 24205 - Mrs. Margaret Cartwright [7195] 24206 - Mrs. Margaret Cartwright [7195] 24212 - Mrs. Margaret Cartwright [7195] 24218 - Mrs. Margaret Cartwright [7195] 24224 - Mrs. Margaret Cartwright [7195] 24230 - Mr Callum Cartwright [8370] 24236 - Mr Callum Cartwright [8370] 24242 - Mr Callum Cartwright [8370] 24248 - Mr Callum Cartwright [8370] 24423 - Mr Kevin Joyner [8375] 24441 - Mrs Vicky Mumby [8378] 24460 - Mr Mark Mumby [8379] 24473 - Mr Frederick Piper [8380] 24481 - Mrs Eileen Piper [8381] 24493 - Mr Albert Pardoe [8002] 24497 - Mr Richard Reed [4708] 24504 - Dr Belinda Dunbar [8382] 24505 - Mr Peter Robinson [4899] 24527 - Mrs Diane Smith [8388] 24546 - Mr Paul De Rosa [8393] 24555 - Mrs Angela Taylor [8392] 24580 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]	Object	There must be more suitable brownfield sites within the borough that having to build on Green Belt in Blackmore. Infrastructure and resources fully stretched at present so no capacity for further development in Blackmore. Blackmore has been disproportionately targeted with a 30% increase in the current population proposed. The Blackmore sites of R25 and R26 are entirely unsuitable for large scale development. There is insufficient infrastructure and there will be impacts on wildlife and habitats.	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24612 - Mr Pete Vince [8123]				
24617 - Mr Lyall Vince [8403]				
24622 - Mrs Tina Wilding [8405]				
24630 - Mr Nicholas Wilkinson [8406]				
24640 - Mr Colin Wilding [8409]				
24653 - Mrs Karen Wood [8411]				
24664 - Mrs Edna Williams [4728]				
24674 - Mr Eric John Webb [1830]				
24678 - Ms Shirley Dearlove [8415]				
24684 - Mrs Patricia Dillon [8417]				
24695 - Mr Desmond Temple [8420]				
24739 - Mrs Patricia Dean [8434]				
24768 - Mrs Angela Taylor [8442]				
24790 - Mrs Deborah Thwaite [8175]				
24819 - Mrs Susan Webb [4919]				
24824 - Mr Adrian Quick [8451]				
24830 - Mr Ronald Quested [8452]				
25007 - Mr John Ginivan [8476]				
25013 - Miss Claire Grant [8478]				
25015 - Mr Christopher Sanders [8474]				
25033 - Ms Victoria Sanders [8482]				
25050 - Mr Alan Snook [8484]				
25072 - Mrs Josephine Snook [8489]				
25374 - Mr Gary Sanders [4923]				
25400 - Mrs Debbie Stevens [8509]				
25402 - Mr Craig Stevens [4958]				
25406 - Mrs Malanie Sanders [8511]				
25428 - Mrs Anne Sands [8514]				
25464 - Mr Terry Sands [8525]				
25504 - Mrs Melanie Simpson [8539]				
25507 - Mrs Gladys Skinner [8540]				
25533 - Mr. James Simpson [4462]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25540 - Mrs Gillian Romang [8107]				
25547 - Mrs Alison Ratcliffe [5040]				
25552 - Mr Richard Romang [6974]				
25559 - Mrs Brigid Robinson [4897]				
25592 - Mr Clive Rosewell [8563]				
25599 - Mr Matthew Romang [8565]				
25605 - Mr David Rolfs [8566]				
25611 - Mrs Yvonne Rolfs [8567]				
25623 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]				
25666 - Mrs Hazel Newcombe [8597]				
25671 - Mr Colin Newcombe [8598]				
25676 - Miss Charlotte Newton [8599]				
25790 - Mrs Pamela Bailey [8010]				
25830 - Miss Jade Hayes [8136]				
25902 - Mr Peter Bartrop [8650]				
25906 - Mrs Carol Bartrop [8651]				
25929 - Mrs Lucille Foreman [8574]				
25935 - Mr Colin Foreman [4394]				
25945 - Ms Deborah Cullen [4547]				
25967 - Mr John Caton [4881]				
25974 - Mr Eugene Cullen [8658]				
25983 - Mr Colin Holbrook [4759]				
25991 - Mrs Janice Holbrook [4700]				
26010 - Mrs Shirley Holmes [8660]				
26031 - Mr Ken Holmes [8662]				
26057 - Malcolm Hurford [7304]				
26086 - Mrs Carole Cole [8675]				
26087 - Mrs Kate Hurford [4275]				
26107 - Mr James Hughes [8677]				
26171 - Mr Michael Jones [8690]				
26177 - Mr Ken Holmes [8691]				
26180 - Mrs Janet Jacobs [8692]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26199 - Mrs Jacqueline Owen [4760] 26327 - Mrs Sandra Wood [8720] 26369 - Mr. Christopher Burrow [4618] 26375 - Mrs Kim Barber [8731] 26383 - Mr. Colin Barber [919] 26429 - Mrs Rachel Caward [8742] 26434 - Mr Lee Caward [8741]		<i>The proposed development in Blackmore should be removed from that plan, and any necessary development should be targeted at areas with suitable infrastructure (capacity). Sites R25 and R26 should be removed from the plan and the plans should refer to the BVHA neighbourhood plan which clearly sets out the Blackmore local housing needs.</i>		
23892 - Redrow Homes [6669]	Object	Criterion B advises that allocated sites 'will be' deallocated from the Green Belt. As the removal of land from the Green Belt can only come about through the preparation of a development plan this de-allocation must happen upon adoption of the plan and not presented as a future intention.  <i>Amend 'will be' in criterion B to 'are'.</i>	Noted	No change
23760 - St Modwen Properties PLC [5124]	Object	The policy should be amended to provide clarity that sites are being removed to enable employment needs to be met, in addition to housing. It should be recognised that the development of employment uses has intrinsic community benefits, with resultant social and economic gains.  <i>Amend to provide clarity that sites are being removed to enable employment needs to be met, in addition to housing.</i>	Noted	No change

## POLICY NE13: SITE ALLOCATIONS IN THE GREEN BELT

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24006 - CALA Homes [5237]	Object	<p>Strongly object. Policy fails to accord with what tests for seeking Planning Obligations set out in Paragraph 56 of the NPPF. It would be both inappropriate and unreasonable to expect developers and landowners to make provision to meet the needs of surrounding existing communities, rather than addressing the actual needs that would arise from new development. Such an approach would be unlawful. Opportunities for onsite provision of new "significant" community facilities on smaller scale Green Belt releases are limited and any contributions made towards offsite provision should not go beyond CIL.</p> <p><i>The following amendments are proposed to the text of Policy NE13:</i>  <i>Paragraph A: delete the whole paragraph the deletion of Section A of the policy in order that the wording is compliant with national policy.</i>  <i>Paragraph B: amend as follow: These sites will be removed from the Green Belt to allow development to take place and provide new defensible boundaries to protect the open countryside for future generations. Site boundaries to form the new Green Belt boundaries are set out on relevant sites in Appendix 2.</i></p>	Noted	No change

## POLICY NE13: SITE ALLOCATIONS IN THE GREEN BELT

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24183 - Redrow Homes (Jenny Massingham) [7948]	Object	<p>In Chapter 9 neither the text nor the individual allocations, for example RO3, Land north of Shenfield, a Green Belt site, make any reference to Green Belt boundary changes and their justification. Policy NE13, Site Allocations in the Green Belt, provides firstly for such sites to provide significant community benefits and secondly that: "These sites will be de-allocated from the Green Belt to allow development to take place and provide new defensible boundaries to protect the open countryside for future generations. Site boundaries to form the new Green Belt boundaries are set out on relevant sites in Appendix 2." short para (8.117) provides some explanation for the quoted section of the policy: "This policy also sets out the principles of removing allocated Green Belt development sites from the Green Belt. This de-allocation will allow for planning applications to be considered within the context of policies within this Plan as well as national policy and guidance." The term "will be" in the policy and the references to setting out the principles and planning applications in the supporting text make it unclear whether the Green Belt boundary changes are affected in the Draft Plan or they need to be justified by subsequent planning applications.</p> <p><i>Redrow Homes propose: 1- A new policy to follow on from Policy SP02, in Chapter 4 (Managing Growth): Alteration of Green Belt Boundaries The areas of land covered by the following policies are removed from the Green Belt: RO3, (and all others concerned) The Council has arrived at these alterations on the basis of a sequential examination of brownfield and other sites not in the Green Belt, of a review of densities of development and of discussions with neighbouring local authorities to test the scope for them meeting some of the need for housing arising in Brentwood. The exceptional circumstances that justify the alterations are the severe shortage of land not within the Green Belt and suitable for development, making it impossible for the Council to meet its housing need other than through limited alterations of Green Belt boundaries. The Council has selected sites for boundary alterations where there will be least harm to the purposes of the Green Belt. 2- A new line to be added in the sequential test set out in para 3.23 Using Land Sequentially and the table revised to focus on</i></p>	Noted	No change

## POLICY NE13: SITE ALLOCATIONS IN THE GREEN BELT

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		land types: - Brownfield land within urban areas - Greenfield land within urban areas - Brownfield land within the Green Belt - Greenfield land within the Green Belt 3- Policy NE13 (Site Allocations in the Green Belt) is altered as follows: These sites are de-allocated from the Green Belt to allow development to take place...4- Para 8.117 is deleted.		
24076 - LaSalle Land Limited Partnership [8362]	Object	Object to NE 13 text "expected to provide significant community benefits, both for surrounding existing communities and those moving into new homes on site" as aspirational and unjustified. Need to release Green Belt to ensure meeting boroughs local housing need. Policy not sound, or justified as it doesn't seek significant community benefits as required by NPPF, paras55-57.  LLLP conclude that Point A of Policy NE13 should be deleted. Paragraph 8.114 should also be deleted or re-drafted to be explicit and entirely clear that the community benefits sought from meeting housing needs on sites released from the Green Belt will only be secured in accordance with the relevant statutory tests and national planning policies.	Noted	No change
23713 - Ms Heather Dunbar [8337] 23824 - Sow & Grow Nursery (Mr. Derek Armiger) [303] 23836 - Sow & Grow Nursery (Ms Kim Armiger) [4657] 23837 - Sow & Grow Nursery (Ms Kim Armiger) [4657] 23854 - Ms Maxine Armiger [4656]	Support	NE 13 A and NE 13 B Supported as it makes clear that allocated sites are being taken out of the Green Belt, providing that the benefits sought as set out in para. 8.114 are realistic and do not harm viability of development.  No change proposed	Support welcomed	No change



## POLICY NE13: SITE ALLOCATIONS IN THE GREEN BELT

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24156 - Wiggins Gee Homes Ltd [2788]	Support	<p>We believe this policy is basically sound in expecting some community return for the release of land from the Green Belt, and the creation of defensible boundaries for the longer term beyond the Plan period. We note the type of community benefits being sought as set out in paragraph 8.114. We have been promoting our client's site at Crow Green Lane, Pilgrims Hatch and have consistently included in our proposals provision for a community facility. The type of facility provided would be determined in consultation with the local community.</p> <p>Paragraph 8.115 mentions a need for smaller units to provide an option to older people wanting to downsize. Again we have consistently included provision within our proposals to meet exactly this particular housing need.</p> <p>Policy NE13 calls for proposals on Green Belt allocations to establish long term defensible boundaries. Again we have consistently explained how good defensible boundaries can be established around our client's land.</p> <p><i>Support the Policy as worded.</i></p>	Support welcomed	No change
22705 - Mrs Christine Blythe [4718]	Support	<p>NE 13 A and NE 13 B Supported as it makes clear that allocated sites are being taken out of the Green Belt, providing that the benefits sought as set out in para. 8.114 are realistic and do not harm viability of development.</p> <p><i>No change proposed</i></p>	Support welcomed	No further action
23906 - Crest Nicholson Eastern [2509] 23912 - Essex Partnership University NHS Foundation Trust [8344] 23999 - Bellway Homes and Crest Nicholson [8351]	Support	<p>Support the release of sites from the Green Belt for development as a justified approach given the lack of alternatives in the Borough. This is consistent with national policy, namely paragraph 136 of the NPPF, which makes allowance for the alteration of Green Belt boundaries through the preparation or updating of Plans where exceptional circumstances are fully evidenced and justified. Support the strategic release of greenbelt sites in sustainable locations. To date there is no evidence that it would be possible to meet the Borough's acute housing needs without amending the Green Belt boundaries as proposed in the draft plan.</p> <p><i>No change proposed</i></p>	Support welcomed	No further action

## POLICY NE13: SITE ALLOCATIONS IN THE GREEN BELT

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24054 - Croudace Strategic Ltd [2656]	Support	<p>Policy NE13 states that sites allocated to meet housing need, within the Green Belt, will be expected to provide significant community benefits. These are the "exceptional circumstances" for sites to be removed from the Green Belt to allow development to take place, providing new defensible boundaries and protecting the open countryside. The NPPF (para 138) states that, where it has been concluded necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. Policy NE13 is "consistent" with the NPPF and sound.</p> <p><i>No change proposed</i></p>	Support of policy welcomed	No further action
<hr/>				
<i>8.114</i>				
24656 - Mrs Karen Wood [8411]	Object	<p>There is no indication within the LDP as to how the proposed Policy R25 and R26 developments around Blackmore will be "repaid through significant benefits to the new and existing communities" (paragraph 8.114)- In fact due to the size of the proposals It would seem to be to the detriment of the existing community through the addition traffic, congestion and flood risk that would result from these policies.</p> <p><i>Sites R25 and R26 should be removed from the LDP. Blackmore Village Heritage Association in cooperation with the local Parish Councils will be producing a local needs plan that will look at the actual needs within the local area for what is already a sustainable community rather than producing a plan that Just seeks to help the Borough Council meet its housing quota, and planners should instead refer to this and produce an updated plan In cooperation with the local community.</i></p>	Noted	No change

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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8.117

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24182 - Redrow Homes (Jenny Massingham) [7948]	Object	<p>In Chapter 9 neither the text nor the individual allocations, for example RO3, Land north of Shenfield, a Green Belt site, make any reference to Green Belt boundary changes and their justification. Policy NE13, Site Allocations in the Green Belt, provides firstly for such sites to provide significant community benefits and secondly that: "These sites will be de-allocated from the Green Belt to allow development to take place and provide new defensible boundaries to protect the open countryside for future generations. Site boundaries to form the new Green Belt boundaries are set out on relevant sites in Appendix 2." short para (8.117) provides some explanation for the quoted section of the policy: "This policy also sets out the principles of removing allocated Green Belt development sites from the Green Belt. This de-allocation will allow for planning applications to be considered within the context of policies within this Plan as well as national policy and guidance." The term "will be" in the policy and the references to setting out the principles and planning applications in the supporting text make it unclear whether the Green Belt boundary changes are affected in the Draft Plan or they need to be justified by subsequent planning applications.</p> <p><i>Redrow Homes propose: 1- A new policy to follow on from Policy SP02, in Chapter 4 (Managing Growth): Alteration of Green Belt Boundaries The areas of land covered by the following policies are removed from the Green Belt: RO3, (and all others concerned) The Council has arrived at these alterations on the basis of a sequential examination of brownfield and other sites not in the Green Belt, of a review of densities of development and of discussions with neighbouring local authorities to test the scope for them meeting some of the need for housing arising in Brentwood. The exceptional circumstances that justify the alterations are the severe shortage of land not within the Green Belt and suitable for development, making it impossible for the Council to meet its housing need other than through limited alterations of Green Belt boundaries. The Council has selected sites for boundary alterations where there will be least harm to the purposes of the Green Belt. 2- A new line to be added in the sequential test set out in para 3.23 Using Land Sequentially and the table revised to focus on</i></p>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		land types: - Brownfield land within urban areas - Greenfield land within urban areas - Brownfield land within the Green Belt - Greenfield land within the Green Belt3- Policy NE13 (Site Allocations in the Green Belt) is altered as follows: These sites are de- allocated from the Green Belt to allow development to take place... 4- Para 8.117 is deleted.		
<i>POLICY NE15: RE-USE AND RESIDENTIAL CONVERSION OF RURAL BUILDINGS</i>				
22606 - Mark Jackson Planning (Mr Mark Jackson) [2004]	Object	Remove the text from para 8.127 that stated the Council would generally apply a presumption in favour of employment generating uses as such approach is outdated and not NPPF compliant.  <i>Omission, completely of the following wordings from paragraph 8.127: "The Council will generally apply a presumption in favour of employment generating uses. Residential conversions will only be permitted where every reasonable effort has been made to secure a suitable business use, or the residential use is a subordinate part of a business re-use, or the use is required for an agricultural or forestry worker. Residential conversions may be appropriate in certain circumstances including where they are adjacent to, or within, existing groups of buildings."</i>	Noted	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>Chapter 9. Site Allocations</b>				
<b>9.1</b>				
23975 - CEG Land Promotions Limited [5050]	Object	<p>CEG supports the general approach outlined in these paragraphs and agrees that the site allocations, including Dunton Hills Garden Village, reflect the spatial strategy and strategic objectives set out earlier in the Local Plan.</p> <p>CEG supports the approach of setting out of each policy by the sub-headings specified, although representations are made below on what is set out for DHGV in Policy R01.</p> <p>CEG supports the cross-reference to other policies in paragraph 9.4 to avoid unnecessary repetition in the Local Plan, but it should be noted CEG has submitted objections to Policy HP04. Consistent with paragraph 6.36 of the Local Plan, and to ensure the Plan is effective, the approach to affordable housing, including mix and tenure, should allow for some flexibility to provide for possible changes in circumstances over the lifetime of the Plan. This should then be carried forward into paragraph 9.17 iii, with reference made to viability as an important aspect which will inform the delivery approach, including the phasing of infrastructure, and legacy management. Modifications are proposed in our response to question no. 6 to this effect.</p> <p><i>As objecting to policy HP04, approach to affordable housing, mix and tenure, should allow for some flexibility to provide for possible changes in circumstances over the life of the plan - and particularly viability as an important aspect which will inform the delivery approach.</i></p>	<p>The Council notes the representation. The proposed modifications Policy HP04 are not agreed. Phased delivery of infrastructure is irrelevant in the same context.</p> <p>Paragraph 9.17 should be retained. If proposals are not viable this triggers a different scope of assessment (i.e. viability assessment in case proposals are non-compliant with AH policy).</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22260 - Mr Ian Colclough [5765] 22564 - Mrs Annette Moorhouse [5332] 22569 - Mrs Annette Moorhouse [5332]	Object	object to the inclusion of site R19 Priests Lane. Access to the site is unsafe, the traffic assessment is flawed and no provision has been made for the additional traffic flow. Full information has been supplied by the PRNLA and I fully support their finding and I support their request to be participate in the oral part of the EiP.	The Council's Local Plan Transport Assessment includes growth proposed from all site allocations as well as background growth planned in surrounding areas. The methodology has been developed through engagement from highways authorities (Essex County Council and Highways England). The assessment sets out the approach to transport modelling, modelling results and junction capacity assessments. It highlights the junctions that may require mitigation, sustainable measures proposed to support growth and the impact this has on junction assessments. The assessment prioritises the sustainable transport requirements of the Local Plan. This work has been undertaken in line with requirements. Mitigation is considered as part of the work and listed in the Council's Infrastructure Delivery Plan.	No further action
<i>Remove the Priests Lane R19 site from the Local Development Plan.</i>				
23734 - JTS Partnership LLP (Mr. James Govier) [2587]	Object	Land at Playfield at Brentwood Ursuline (Site ID:19b) should be removed from the designation of Protected Urban Open Space (PUOS) and be considered for development as it does not make a meaningful contribution to PUOS. The site is in a central urban area and very well located to the town centre, public transport network, public open space and other services.  <i>Publication of the Policies Proposals Map to enable it to be consulted upon and to provide context to the references to it within the draft Submission Plan.</i>	No changes are proposed to the protected urban open spaces designation in the borough other than allocation of residential development at site R19 (Land at Priests Lane), which was published as a change. Land designated protected urban open space at Playfield (Brentwood Ursuline) is not proposed to be amended, therefore remaining as the same designation.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22242 - Mr Anthony Cross [4376]	Object	<p>Inclusion of site allocations R25 and R26 in the LDP are inappropriate, unsound and not compliant with legal requirements on the following grounds: failure to prove that more suitable (brownfield) sites do not exist in the borough, or that other site allocations couldn't absorb the 70 dwellings proposed; inadequate consultation with Epping Forest District Council and failure to properly consider the impact of other nearby developments on Blackmore; failure to recognise the increased flood risk resulting from the proposed development; adverse impact on roads, noise levels and safety of existing road users from increased traffic; inadequate local amenities/services; other considerations per full representation.</p> <p><i>Removal of proposed developments R25 and R26 from the plan and reallocation of the 70 dwellings to more suitable brownfield sites in the borough.</i></p>	<p>Through gathering evidence in support of the Local Plan, the Council has not identified infrastructure issues that would prevent delivery of this number of homes (see Infrastructure Delivery Plan). The housing needs of the borough have been evidenced and the Council is proposing a spatial strategy to meet that need, which includes some development in villages such as Blackmore in order to provide a flexible supply of locations for new development to meet needs, as required by the NPPF (see NPPF paragraph 68). A sequential approach to identifying locations for development has been applied, starting with existing urban areas and brownfield sites. There is not enough urban area/brownfield land to meet development needs, and so the Council has reluctantly considered release of Green Belt to meet those needs. Transport, flood risk, Green Belt and water cycle; landscape and ecology studies have been undertaken and published as part of the Local Plan evidence base, informing policies and site allocations. The Council remains engaged with its neighbours such as Epping Forest District Council on strategic cross boundary matters.</p>	No further action
<hr/>				
9.4				
22205 - Mr Christopher Garside [8210]	Object	<p>Affordable housing based on current salaries is normally not provided in new developments. Councils bow down to profiteering housing developers and must insist that appropriate numbers of affordable housing is developed at the same time as housing developed for profit. It doesn't cost very much to build a house!!</p> <p><i>Build affordable housing at the same time and in % proportion to other housing.</i></p>	<p>Noted. There will be A Dunton Hills Specific Housing topic paper will be prepared to ensure affordable housing is provided at DHGV. This will provide further guidance in addition to the affordable housing policy set out in policy HP 05.</p>	No change



<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23981 - CEG Land Promotions Limited [5050]	Object	<p>Paragraph 9.4 should be amended for consistency with paragraph 6.36 and to ensure the Plan is effective. as follows:            "Affordable housing should be provided in line with Policy HP05, as well as considerations for specialist housing, Policy HP04. Some flexibility may be required in relation to the approach to affordable housing and the phased delivery of infrastructure to ensure viable proposals come forward over the life of the Plan."</p> <p><i>Paragraph 9.4 should be amended for consistency with paragraph 6.36 and to ensure the Plan is effective. as follows:            "Affordable housing should be provided in line with Policy HP05, as well as considerations for specialist housing, Policy HP04. Some flexibility may be required in relation to the approach to affordable housing and the phased delivery of infrastructure to ensure viable proposals come forward over the life of the Plan."</i></p>	Paragraph 9.4 should be retained. If proposals are not viable this triggers a different scope of assessment (i.e. viability assessment in case proposals are non-compliant with AH policy).	No change
22567 - Mrs Annette Moorhouse [5332]	Object	<p>I object to the inclusion of the Priests Lane site in the Local Development Plan for several reasons most significantly road safety, traffic congestion, air pollution, site access and the loss of a Protected Urban Space.</p> <p><i>The Priests Lane site should be removed from the Local Development Plan.</i></p>	<p>The Council's Local Plan Transport Assessment includes growth proposed from all site allocations as well as background growth planned in surrounding areas. The methodology has been developed through engagement from highways authorities (Essex County Council and Highways England). The assessment sets out the approach to transport modelling, modelling results and junction capacity assessments. It highlights the junctions that may require mitigation, sustainable measures proposed to support growth and the impact this has on junction assessments. The assessment prioritises the sustainable transport requirements of the Local Plan. This work has been undertaken in line with requirements. Mitigation is considered as part of the work and listed in the Council's Infrastructure Delivery Plan. Site access from Priests Lane will need to comply with highways authority standards, including safety. Policy R19 includes the requirement that public open space is provided as part of new development.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
9.5 22568 - Mrs Annette Moorhouse [5332]	Object	<p>object to the inclusion of the Priests Lane site in the Local Development Plan for the loss of a Protected Urban Space. I fully support the information supplied by the PRNLA which details why the Priests Lane site should be removed for solid, justifiable reasons which the council have failed to address.</p> <p><i>The Priests Lane site R19 should be removed from the plan.</i></p> <p><i>The site should remain a protected urban space and used for the community.</i></p>	Policy R19 includes the requirement that public open space is provided as part of new development.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.6</b>				
24138 - Mr Iain Low [5329]	Object	<p>The subject land in the ownership of Mr Low, site plan enclosed at Appendix A, has an area 6.5 acres. The site comprises of Mr Low's residential property and adjoining land which lies immediately adjacent to the junction of the A128 / A127. Mr Low supports the allocation of the site and the removal of the land from the Green Belt as identified in the Draft Local Plan. Mr Low is keen to work with the Planning Authority and the promoter of the Garden Village in bringing forward the land for development. There is, however, no formal agreement between Mr Low and CEG in place in regard to future proposals on this site. It is surprising that the Local Plan is now at an advanced stage yet there remains uncertainty regarding the role of the landowners and promoters in respect of the Garden Village. This calls in question the deliverability of the landholding and Mr Low is keen that this matter is clarified in advance of the submission of the Local Plan to the Secretary of State. The Strategic Housing Allocation R01 incorporates the subject site owned by Mr Low. However contrary to the statement at 9.6 of the Local Plan, there is no reference to joint working between landowners in the Local Plan Policy R01. This needs to be clarified and addressed as the policy in its current form is undeliverable given there is more than one party involved in the garden village allocation. In terms of the tests of soundness this omission in the Draft Local Plan results in the policy not being justified or effective as it is currently prepared.</p> <p><i>the Local Plan should reflect the fact that there is more than one party involved in DHGV allocation. Mr Low would welcome greater formal commitment from CEG regarding the future of the site, in advance of the Examination in Public on the Local Plan.</i></p>	<p>Noted. No change is proposed to paragraph 9.6. Through the governance arrangements for DHGV, a Masterplan Framework is being prepared and Supplementary Planning Document that applies to the who site allocation. This is being prepared in collaboration with landowners and other stakeholders. This does not preclude the ability for any landowners to bring forward an application for their land. Any arrangements between CEG and other landowners should be agreed between those parties.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.7</b>				
22345 - Wingfield Planning Consultancy (Mr. Ben Willis) [2794]	Object	<p>Support the inclusion of site ref: 053B Hatch Lane. Have attached appeal decision. SA supports targeted enhancements to community infrastructure at Pilgrims Hatch. This site is suitable to be released as a sequential site in the Green Belt. Although an appeal failed, Inspector summed up factual matters in decision making process. No objection to highways and the ability of the road network to accommodate growth; no objection to the proposed commercial element in providing new commercial floor space and a doctors surgery, no objection on impact on wildlife, no objection on impact on wider views and defensible boundary to the north, no objection on impact on design and residential amenities. therefore site fulfils sequential test for sustainable development, only issue is Green Belt. Site therefore proven to be suitable.</p> <p><i>Add site 053B to plan and remove from Green Belt. .</i></p>	The Council has allocated sites that it considers to meet the strategy. Suggestion of site 053B not considered to be appropriate.	No further action
23695 - Catherine Williams [7454]	Object	<p>Land owned by MM Properties on Wyatt's Green Road should be allocated as part of the Local Plan sites, as it is suitable and available to be developed. Although the site is currently designated green belt whilst part of the site is brownfield. The site is self-contained and provides limited functions towards achieving the five green belt purposes. Furthermore, the Council's OAN is based on the 2016 HDT and during the consultation period the MHCLG determined that the 2014 projections should be used thus resulting in a deflated housing need figure by 24%.</p> <p><i>This site should be included as part of the site allocations within the Local Plan.</i></p>	The Council has allocated sites that it considers to meet the strategy. Suggestion of site at Wyatt's Green not considered to be appropriate.	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22594 - Dr Philip Gibbs [4309]	Object	Brentwood Council have planned development South of the A127 where severe strain on road, rail and education infrastructure is already coming from development in Basildon, Thurrock and elsewhere. They are not allowing the considerable government funding in the A12 and Crossrail to unlock the economic development needed along the A12 corridor. This is unsustainable under the policies of the NPPF.	Noted. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives. Further justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper.	No change
		<i>Remove the Dunton Hills Garden Village development. Add development along the A12 corridor instead.</i>		
23805 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738]	Support	SUPPORT the reference to R02 on the list of Strategic Housing Allocations.	Support welcomed	No further action
		<i>No change proposed</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Dunton Hills Garden Village Strategic Allocation</i>				
23601 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	The proposed Dunton Hills Garden Village (DHGV) site is a Historic Environment Zone, meaning that it is highly sensitive to medium to large-scale development. DHGV would cause severe harm to that environment. (As described in the Essex Thames Gateway Historical Environment Characterisation Project, 2007. Area 107_1.	Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved. Resolution of any potential issues is required prior to any planning determination on the site. Environmental impact mitigations / improvement considerations are required. One of the key considerations is views to and from All Saints' Church, East Horndon. Consideration of heritage buildings and the heritage setting is a key requirement. DHGV has been chosen as a strategic location for a large proportion of Brentwood Borough Council's housing Growth. The justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper.	No change
23602 - Dunton Community Association (Mr Edward Cowen) [6185]		Will also impact on the listed buildings in the area		
23603 - Dunton Community Association (Mr Edward Cowen) [6185]				
<i>In order to make the Plan justified and consistent with national policy DHGV should be removed from the Plan, and housing growth re-allocated to areas of the Borough that are less historically sensitive.</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23607 - Dunton Community Association (Mr Edward Cowen) [6185] 23608 - Dunton Community Association (Mr Edward Cowen) [6185] 23611 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	<p>The Dunton Hills Garden Village (DHGV) development would reduce much-needed public access to open space. The countryside to the west of Dunton Wayletts provides a publicly accessible and sustainable link between Langdon Hills Country Park and Thorndon Country Park. A network of country lanes, footpaths and bridleways enables people to walk from one to the other without encountering a main road except for the unavoidable need to pass over the A127 and A128. The Dunton Hills Garden Village (DHGV) development would bisect an important wildlife connectivity corridor. The open land between Dunton Wayletts and West Horndon forms a wildlife connectivity corridor between Thorndon Country Park and Langdon Hills Country Park. DHGV, together with the East Horndon employment site, would cut into the corridor. The developments would interfere with the passage of wildlife between habitats at the two parks (see Essex Wildlife Trust's response to the Authority's Strategic Growth Options Report). The Dunton Hills Garden Village (DHGV) development would threaten ancient woodlands. The corridor of land, running roughly north-south through the proposed DHGV site along the path of the Mardyke, is ancient woodland. It is the southern leg of the ancient woodland at Eastlands Spring, the whole wood being a Local Wildlife Site. The Association has reason to believe that the coppice a little to the north of the centre of the proposed DHGV site is also ancient woodland.</p> <p><i>In order to make the Plan justified and consistent with national policy DHGV should be removed from the Plan and housing growth reallocated to areas of the Borough where developments would not reduce access to open space or negate the value of such access.</i></p>	Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved. It is noted that there is a significant amount of open space proposed for DHGV which include connections and improvements to surrounding open spaces in the area. DHGV has been chosen as a strategic location for a large proportion of Brentwood Borough Council's housing Growth. The justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper. Resolution of any potential issues is required prior to any planning determination on the site. Environmental impact mitigations / improvement considerations are required.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23600 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	The Dunton Hills Garden Village (DHGV) development would lie in an area of exceptionally poor	Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved. Resolution of any potential issues is required prior to any planning determination on the site. Air quality mitigation is one of the considerations required.	No change
<i>Remove Dunton from plan</i>				
23605 - Dunton Community Association (Mr Edward Cowen) [6185] 23606 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	The local road network could not absorb the increase in vehicle movements resulting from Dunton Hills Garden Village (DHGV). The A128 is a heavily used single-carriageway road forming a link between the A13 and the A127. There are no plans to upgrade it. The only feasible access point for DHGV would be an unsatisfactory junction with the A128 handling an excessive volume of traffic. The junction on the opposite side of the A128 (feeding West Horndon) is overloaded at peak times. Neither the access road itself nor the A128 could adequately cope with the traffic from a 2,500-home development. A 2,500-home development at the Dunton Hills Garden Village (DHGV) site would be effectively inaccessible. Access from the north (A127) would need to be via a grade-separated junction with the A127. The presence of ancient woodland would make it difficult to construct such a junction. Furthermore the existing junctions at Dunton and the Halfway House are only two kilometres apart. It would not be possible to interpose a further junction without breaching national standards for minimum weaving-length. Access from the west (A128). The western part of the site lies within Flood Zone 3. A report by consultants Odyssey Markides commented that providing an access road through flood zones 2 or 3 is costly both in terms of construction and maintenance and does not usually represent a viable access strategy.  <i>In order to make the Plan justified DHGV should be removed from the Plan and housing growth directed to areas of the Borough not reliant on the A127 or A128.</i>	Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved. As part of Duty to Cooperate, Brentwood Borough Council are working with transport authorities to address any transport impacts. It is noted that the DHGV proposal is indented to provide a sustainable transport development that will minimise any impact to surrounding areas. DHGV has been chosen as a strategic location for a large proportion of Brentwood Borough Council's housing Growth. The justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper. As part of the preparation of the Masterplan Framework and any planning application that comes forward on the DHGV site, flooding mitigation measures are required.	No change



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23613 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	<p>The Dunton Hills Garden Village (DHGV) development would lie in a high-risk flood zone. The centre of the DGHV site, roughly following the route of the Mardyke (or Eastland Spring as that stretch is often known) is designated by the Environment Agency as an area at the greatest risk ("high") of</p> <p><i>In order to make the Plan justified and consistent with national policy DHGV should be removed from the Plan and the housing growth redirected to some of the many areas of the Borough at low risk of flooding.</i></p>	<p>Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved. Resolution of any potential issues is required prior to any planning determination on the site. Environmental impact mitigations / improvement considerations are required. DHGV has been chosen as a strategic location for a large proportion of Brentwood Borough Council's housing Growth. The justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper.</p>	No further action
23612 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	<p>The Dunton Hills Garden Village (DHGV) development and the East Horndon employment site would be unacceptably close to a Site of Special Scientific Interest (SSSI). The proposed DHGV and East Horndon sites are in close proximity to the SSSI at Thorndon Country Park. These proposed developments would reduce the buffer zone to the south-east of the SSSI to well under one mile and would therefore have an adverse impact on the SSSI. The inclusion in the Plan of DHGV and the East Horndon employment site therefore contravenes paragraph 174(a) of the National Planning Policy Framework.</p> <p><i>In order to make the Plan justified and consistent with national policy DHGV and the East Horndon employment site should be removed from the Plan and growth redirected away from the SSSI at Thorndon Park.</i></p>	<p>Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved. Resolution of any potential issues is required prior to any planning determination on the site. Environmental impact mitigations / improvement considerations are required. DHGV has been chosen as a strategic location for a large proportion of Brentwood Borough Council's housing Growth. The justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24264 - Mr Jeffrey Goodwin [5004]	Object	Brentwood Councils Local Plan, January 2018, shows 4,000 New Homes and advised wish built in current planning period. (16,000 people and 8,000 vehicles besides over 30+ Travellers/Gypsy pitches). But understand may well double in size in future.	6 additional Travellers/Gypsy pitches are required over the plan period and 2,770 dwellings. Vehicle movements are intended to be mitigated as a way of implementing sustainable transport measures. Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved.	No further action
<i>Remove DHGV from plan</i>				
23592 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	The envisaged Plan is not robust because it places excessive reliance on one site, Dunton Hills Garden Village (DHGV), which at best could not deliver homes in the timeframe expected and at worst could prove a completely unviable location. DHGV was selected to meet the majority of the Borough's housing need within the Plan period and beyond (paragraph 5.90 of the Plan).  <i>In order to make the Plan effective DHGV should be removed as a development site and the housing growth distributed to more viable sites in the Borough where the delivery of homes can be assured.</i>	Noted. DHGV has been chosen as a strategic location for the majority of Brentwood Borough Council's housing Growth. The justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper.	No change
24257 - Mr Jeffrey Goodwin [5004] 24283 - Mr Max Aitkins [5790]	Object	Brentwood Council now advise after over 4 years is producing an Infrastructure Delivery Plan (IDP) which will provide an overview of the infrastructure requirements associated with the Local Plan and how Brentwood intend to support the development. However unable to supply any information to back the IDP comment!  <i>Remove DHGV from plan</i>	The Infrastructure Development Plan is being updated and is available to view.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24252 - Mr Jeffrey Goodwin [5004] 24278 - Mr Max Aitkins [5790]	Object	The council state nothing is your problem to confirm is safe & risk free. You will not be providing any funding for anything. Infrastructure is always someone else's problem: NHS; Essex County Council, Bus Companies, C2C's etc.	DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives.	No change
<i>Remove DHGV from plan</i>				
23429 - Ms Rachael Mellor [8321] 23431 - Ms Rachael Mellor [8321] 23433 - Ms Rachael Mellor [8321] 23435 - Ms Rachael Mellor [8321] 23437 - Ms Rachael Mellor [8321]	Object	Object to DHGV. This development could not be further away from Brentwood, it's Brentwood allocation using Basildon and Thurrock's services. There is no clear plan for infrastructure: there is no regular bus service so elderly who cannot drive often rely on ambulances to get to hospital appointments. There is no clear plan for infrastructure: the kids in this area don't have a good local school instead all go to variety of schools in Essex. There is a rising number of burglaries in Basildon. It's crazy that you plan on adding such a massive volume of residents that will likely be from outside of Essex or buy to rent owners without any consideration for the current residents or improvements to the area. The A127 is already a nightmare and it is the only way in and out of Southend, placing more stress on the A13 is not a viable option.	Noted. DHGV has been chosen as a strategic location for the majority of Brentwood Borough Council's housing Growth. The justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper. It is noted that as part of Duty to Cooperate and ahead of any planning application, consultation with adjoining councils is required to resolve service capacity issues as identified in the submission. Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved. As part of Duty to Cooperate, Brentwood Borough Council are working with transport authorities to address any transport impacts. It is noted that the DHGV proposal is indented to provide a sustainable transport development that will minimise any impact to surrounding areas.	No change
<i>Remove DHGV form the plan</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23596 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	<p>Dunton Hills Garden Village (DHGV) together with the series of employment sites proposed on the A127 corridor would constitute ribbon development. DHGV, the East Horndon employment site and Brentwood Enterprise Park would create a shallow band of development along the A127 from Laindon to the M25. The Authority is therefore promoting ribbon development, one of the most objectionable forms of urban expansion.</p> <p><i>In order to make the Plan consistent with national policy, DHGV, Brentwood Enterprise Park and the East Horndon employment site should be removed from the Plan, and the housing and employment growth reallocated to sites elsewhere in the Borough.</i></p>	Noted. DHGV has been chosen as a strategic location for the majority of Brentwood Borough Council's housing Growth. The justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper. The Southern Brentwood Growth Corridor (along the A127) is identified as an opportunity for increased development with sustainable transport measures put in place.	No change
23384 - BJ Associates [8317]	Object	<p>An annual housing rate of 310 per year to 2023 reflects poor and unrealistic housing site choices.</p> <p><i>No change proposed</i></p>	It is expected that an annual housing rate of 310 is achievable in accordance with SP02. Detailed delivery plan will be provided with the Outline Planning Application submitted by CEG to assure this.	No change
23299 - West Horndon Parish Council (Mr Kim Harding) [381]	Object	<p>The Brentwood Strategic Flood Risk Assessment (SFRA) 2018 identifies that large sections of the area around West Horndon, including the land to the east which connects it to the DHGV site, are considered to be high risk flood areas. In light of this and the fact that these events are occurring with increasing regularity (and scientific evidence making clear that a major cause of this is climate change), it is considered vital that a precautionary approach is taken to considering the impact of flooding.</p> <p><i>No change proposed</i></p>	As part of the preparation of the Masterplan Framework and any planning application that comes forward on the DHGV site, flooding mitigation measures are required.	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23125 - Thurrock Borough Council (Mr Richard Hatter) [2461]	Object	<p>Thurrock Council considers that there are key strategic issues and cross-boundary matters of importance in relation to the preparation of the Brentwood Local Plan that remain outstanding and should be addressed through further effective engagement and collaboration between Brentwood Council and Thurrock Council and with the other South Essex authorities under the Duty to cooperate. The key matters include:</p> <ul style="list-style-type: none"> <li>* Confirmation of the Brentwood Objectively Assessed need and whether the borough can accommodate its need;</li> <li>* The spatial strategy and alternative options within the A12 and A127 corridors to accommodate the growth;</li> <li>* The Thurrock Council concerns regarding the justification of Dunton Garden Village and the need to consider alternative options including at West Horndon;</li> <li>* Transport and other infrastructure Issues;</li> <li>* Further development of the Brentwood Local Plan evidence base;</li> <li>* The development of the South Essex Joint Strategic Plan and evidence.</li> </ul> <p>In particular in recognition of the Thurrock concern about Dunton Hills Garden Village and due to its location close to and adjoining the boundaries between the two authorities Thurrock Council requests further engagement on this development and considerations of alternative options along the A127 Corridor and elsewhere.</p> <p>Changes to Plan: To ensure more effective collaboration and joint working it is suggested that Brentwood Council should progress key strategic matters through the South Essex Joint Strategic Plan process as well as with individual local authorities on cross-boundary matters.</p> <p>Brentwood Council will need to consider how much additional evidence base for housing need and capacity can be prepared in partnership with adjoining authorities and the other South Essex authorities. In addition to the preparation of the SGLS study which includes a high level housing land and capacity assessment, the South Essex authorities are in the</p>	<p>Brentwood Borough Council has been attempting to engage with Thurrock Council throughout the preparation and consultation of the Local Plan. It has also attempted to continue to engage throughout the preparation of documents relating DHGV. Engagement requests and events are set out in the Duty to Cooperate. Preparation of a Statement of Common Ground will continue to be sought with Thurrock Council. DHGV has been chosen as a strategic location for the majority of Brentwood Borough Council's housing Growth. The justification for its strategic location within the Greenbelt is set out in the borough strategy within this document.</p>	Continue engagement with Thurrock Borough Council.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>course of commissioning of additional elements of evidence base to support the preparation of the joint strategic planning including a review of the South Essex SHMA, a Strategic Green Belt review and further infrastructure studies.</p> <p>The outcome of these studies and the preparation of the joint strategic planning will have implications for the nature and scale of housing provision across South Essex including Brentwood and the future approach to be taken in the Local Plan.</p> <p>Section 3.6 of the Brentwood Local Plan should identify the key cross-boundary issues and challenges between Brentwood and adjoining authorities including Thurrock. It should set out how the plan seeks to address these including any future reviews of the plan and through joint working on the South Essex JSP.</p> <p>Brentwood Council should prepare Statements of Common Ground on strategic cross- boundary matters in accordance with the requirements of the National Planning Policy Framework and Planning Policy Guidance.</p> <p>Notwithstanding any additional text to the plan setting out key cross-boundary issues it is considered that the Duty to Cooperate has not been met as Brentwood Council has not undertaken effective and on-going engagement regarding the Dunton hills Garden village.</p> <p>The Brentwood Pre-Submission Local Plan has also therefore not been prepared with a positive and justified strategy.</p> <p><i>To ensure more effective collaboration and joint working it is suggested that Brentwood Council should progress key strategic matters through the South Essex Joint Strategic Plan process as well as with individual local authorities on cross-boundary matters. Brentwood Council will need to consider how much additional evidence base for housing need and capacity can be prepared in partnership with adjoining authorities and the other South Essex authorities. In</i></p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>addition to the preparation of the SGLS study which includes a high level housing land and capacity assessment, the South Essex authorities are in the course of commissioning of additional elements of evidence base to support the preparation of the joint strategic planning including a review of the South Essex SHMA, a Strategic Green Belt review and further infrastructure studies.</p> <p>The outcome of these studies and the preparation of the joint strategic planning will have implications for the nature and scale of housing provision across South Essex including Brentwood and the future approach to be taken in the Local Plan.</p> <p>Section 3.6 of the Brentwood Local Plan should identify the key cross-boundary issues and challenges between Brentwood and adjoining authorities including Thurrock. It should set out how the plan seeks to address these including any future reviews of the plan and through joint working on the South Essex JSP.</p> <p>Brentwood Council should prepare Statements of Common Ground on strategic cross- boundary matters in accordance with the requirements of the National Planning Policy Framework and Planning Policy Guidance.</p> <p>Notwithstanding any additional text to the plan setting out key cross-boundary issues it is considered that the Duty to Cooperate has not been met as Brentwood Council has not undertaken effective and on-going engagement regarding the Dunton hills Garden village.</p> <p>The Brentwood Pre-Submission Local Plan has also therefore not been prepared with a positive and justified strategy.</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23614 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	The Dunton area is required to be left undeveloped for aviation purposes. The sky above the open land to the west of Dunton Waylets is used for aerial acrobatics. Any urban development in that area would constitute congestion for the purposes of the Rules of the Air Regulations 2014 and is not permissible. The flight-path for the Heathrow arrival stream follows the A127. The southward departure stream from Stansted intersects it as it passes over the open countryside in the vicinity of Dunton Waylets. To add to this, aircraft held in the Lambourne Stack pass through the same airspace.	Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved. Resolution of any potential issues is required prior to any planning determination on the site. Flight-path considerations are required as part of the assessment. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives. Further justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper.	No change
<i>In order to make the Plan consistent with national policy DHGV should be removed from the Plan and the housing growth redirected to areas of the Borough away from the open countryside in the Dunton area.</i>				
24249 - Mr Jeffrey Goodwin [5004] 24250 - Mr Jeffrey Goodwin [5004] 24251 - Mr Jeffrey Goodwin [5004] 24274 - Mr Max Aitkins [5790] 24275 - Mr Max Aitkins [5790] 24276 - Mr Max Aitkins [5790]	Object	I object to DHGV because Brentwood residents want development in north of the borough, North Brentwood, Pilgrims Hatch and Greenfield sites North of A12 to keep families together and to provide Affordable/Social Housing. I object to DHGV because Brentwood residents want development in north of the borough as easy to build and have major new roads e.g. to M25 and others upgraded and have superb Infrastructure, Air Quality and other major benefits..	The Council welcomes the comment. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives.	No change
<i>Remove Dunton Hills Garden Village from Plan</i>				



<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23609 - Dunton Community Association (Mr Edward Cowen) [6185] 23610 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	<p>The Dunton Hills Garden Village (DHGV) development would intrude into the Mardyke Valley, a valued landscape. The northern (south-flowing) tributary of the Mardyke runs through the DHGV area. Thurrock Council, in its Sustainability Appraisal 2007, identified two Special Landscape Areas: the Mardyke Valley and Langdon Hills. These were adopted because of their landscape importance in a regional or County-wide context. Development would frustrate the objectives of the Thames Chase Community Forest. The Mardyke Valley, in which the proposed DHGV and Brentwood Enterprise Park sites lie, is one of the backbones of the Thames Chase Community Forest. Thames Chase is not a single forest but a network of woods, forests and country parks linked by open countryside. The Mardyke Valley is a corridor of countryside linking Thorndon Country Park, at the northernmost end of Thames Chase, with country parks and other sites further south.</p> <p><i>In order to make the Plan justified and consistent with national policy DHGV should be removed from the Plan, and growth redirected to some of the many areas of the Borough that are of no recognised landscape value</i></p>	Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved. Resolution of any potential issues is required prior to any planning determination on the site. Environmental impact mitigations / improvement considerations are required. DHGV has been chosen as a strategic location for a large proportion of Brentwood Borough Council's housing Growth. The justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper.	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23615 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	<p>A development on the scale proposed would dominate this rural area and overwhelm the adjacent villages. The Dunton Hills Garden Village (DHGV) site extends to the boundary with Basildon Council and would lie only about 200 metres away from the westernmost properties in Dunton Wayletts, a village of 250 homes. A development on the scale proposed would dominate this rural area and overwhelm the</p> <p><i>In order to make the Plan justified and consistent with national policy DHGV should be withdrawn from the Plan and the housing growth redistributed in such a way that new developments respect adjacent settlements and are proportionate in size to those settlements.</i></p>	<p>Noted. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives. Further justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper.</p>	No Change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23648 - Countryside Properties [250]	Object	DHGV is beset with the problem of a lack of technical evidence to support the proposed new settlement. It shares concerns similar to Uttlesford's Local Plan, about potential gaps in the timing and funding of large critical infrastructure associated with the proposed Garden Communities that are central to the overarching strategy of the Plan, in particular the delivery of housing.	<p>Noted. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives. Further justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper. The Council is of the view that DHGV can be delivered within the required timeframes as set out within the published trajectory. As part of the masterplan work, further information will be forthcoming on delivery of DHGV.</p> <p>Noted and agreed.</p>	No change. Refer to DHGV topic paper.
		<p><i>The SA and evidence base do not support the spatial strategy for growth set out in the Local Plan. The Local Plan process should be suspended to allow a fundamental review of the SA.</i></p>		

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23649 - Countryside Properties [250]	Object	<p>In the absence of a clear delivery plan, the Plan is subject to criticism from adjacent authorities: Basildon questions whether the scale of development proposed at Dunton could be supported by infrastructure, and Thurrock cites a lack of technical evidence and failure to test fully all the reasonable options given the decision to rely on a new settlement rather than urban extensions closer to existing infrastructure.</p> <p><i>The SA and evidence base do not support the spatial strategy for growth set out in the Local Plan. The Local Plan process should be suspended to allow a fundamental review of the SA.</i></p>	<p>DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives. Further justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper. In relation to delivery, the Council is of the view that DHGV can be delivered within the required timeframes as set out within the published trajectory. As part of the masterplan work, further information will be forthcoming on delivery of DHGV.</p>	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23618 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	<p>The Authority has cynically offloaded its housing and other needs to an edge of the Borough where a neighbouring borough will shoulder the infrastructure burden. The Authority has ignored the fact that the infrastructure on the Basildon-Southend corridor cannot realistically be improved.</p> <p><i>In order to make the Plan justified it should be withdrawn. It should be reformulated with a proper and objective assessment of infrastructure capacity across the Borough. The new Plan should locate housing and employment growth in a way that is sensitive to the impact on the Borough of Basildon.</i></p>	<p>Noted. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives. Further justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper. It is noted that as part of Duty to Cooperate and ahead of any planning application, consultation with adjoining councils is required to resolve service capacity issues as identified in the submission.</p>	Refer to Dunton Hills Garden Village topic paper.

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue/Change to Plan</b>	<b>Council's Assessment</b>	<b>Action</b>
23617 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	<p>The decision-making process leading to the selection of the Dunton Hills Garden Village (DHGV) site has been casual, arbitrary, disorganised and not based on proper evidence. Evidence gathered after the decision was made, which has highlighted the unsuitability of the site for development, has simply been ignored. The DHGV concept has its roots in the ill-conceived Dunton Garden Suburb (DGS) proposal in early 2015.</p> <p><i>In order to make the Plan justified it should be withdrawn. In the new Plan the siting of areas for development should be based on an objective assessment of their suitability. The evidence revealing the impracticality and disadvantages of locating large-scale development at Dunton Hills should be properly considered, and more appropriate sites selected elsewhere in the Borough.</i></p>	<p>Noted. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives. Further justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper.</p>	Refer to Dunton Hills Garden Village topic paper

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23604 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	<p>The numbers for Dunton Hills Garden Village (DHGV) would not justify schools at the site, and so the site is not sustainable. At a Duty to Co-operate meeting between the Authority and Basildon Council and Essex County Council on 28th June 2017 Essex County Council indicated that the numbers for DHGV were only "borderline" to justify the proposed schools. That was at a time when Basildon Council was planning for 1,000 homes at Dunton on its side of the boundary and when the concept agreed between the two councils was that one school would serve the new homes on both sides of the border. Now that Basildon Council's intended allocation at Dunton has been reduced to 300, DHGV is unlikely to justify its own school. The transportation of children to schools in other settlements would lead to significant additional vehicle movements. In this respect DHGV is not a sustainable location.</p> <p><i>In order to make the Plan justified and consistent with national policy DHGV should be removed from the Plan and housing growth reallocated to sustainable sites within the Borough.</i></p>	School requirements are set out by Essex County Council (ECC) and DHGV is providing schools in accordance with ECC requirements. This is also consistent with Policy RO1 (II). DHGV has been chosen as a strategic location for a large proportion of Brentwood Borough Council's housing Growth. The justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23974 - CEG Land Promotions Limited [5050]	Object	<p>Agent: Nathaniel Lichfield &amp; Partners (Mrs Pauline Roberts) [8354] Respondent: CEG Land Promotions Limited [5050] Received: 15/5/2019 via Email</p> <p>Paragraphs 9.1 - 9.7</p> <p>CEG supports the general approach outlined in these paragraphs and agrees that the site allocations, including Dunton Hills Garden Village, reflect the spatial strategy and strategic objectives set out earlier in the Local Plan.</p> <p>CEG supports the approach of setting out of each policy by the sub-headings specified, although representations are made below on what is set out for DHGV in Policy R01.</p> <p>CEG supports the cross-reference to other policies in paragraph 9.4 to avoid unnecessary repetition in the Local Plan, but it should be noted CEG has submitted objections to Policy HP04. Consistent with paragraph 6.36 of the Local Plan, and to ensure the Plan is effective, the approach to affordable housing, including mix and tenure, should allow for some flexibility to provide for possible changes in circumstances over the lifetime of the Plan. This should then be carried forward into paragraph 9.17 iii, with reference made to viability as an important aspect which will inform the delivery approach, including the phasing of infrastructure, and legacy management. Modifications are proposed in our response.</p> <p><i>CEG sets out the modifications it considers are necessary to make Policy R01 sound, the reasons for which are explained in question no. 5 above.</i></p> <p><i>Other comments outlined above relating to the supporting text to Policy R01 are left for the Council to consider by way of minor modifications. The modification of Policy R01 in the manner set out below may require some of the supporting text to be aligned accordingly, in the manner described in response to question no. 5.</i></p>	<p>Paragraph 9.17 should be retained. If proposals are not viable this triggers a different scope of assessment (i.e. viability assessment in case proposals are non-compliant with affordable housing policy). The proposed modifications Policy HP04 are not agreed. Phased delivery of infrastructure is irrelevant in the same context.</p> <p>Disagree with proposed amendments.</p> <p>Paragraph 9.17 should be retained. If proposals are not viable this triggers a different scope of assessment (i.e. viability assessment in case proposals are non-compliant with affordable housing policy).</p> <p>Amendments to reflect proposed changes in Focussed Addendum document 2020. Update to 2,770 homes</p>	Amend with regard to proposed Focussed Addendum



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>Proposed Modifications to Chapter 9. Site Allocations</i>		
		<i>Paragraph 9.4 should be amended for consistency with paragraph 6.36 and to ensure the Plan is effective. as follows:</i>		
		<i>"Affordable housing should be provided in line with Policy HP05, as well as considerations for specialist housing, Policy HP04. Some flexibility may be required in relation to the approach to affordable housing and the phased delivery of infrastructure to ensure viable proposals come forward over the life of the Plan."</i>		
		<i>Paragraph 9.17 iii. should be amended for the same reasons, as follows:</i>		
		<i>"The Delivery Approach and Legacy Management - setting out the expectations for how the phased delivery of the scheme should be approached to ensure proposals are viable and embed an ethos of co-design and participation, timely and good governance in delivery, and an embedded legacy management of the village assets.</i>		
		<i>Proposed Modifications to Policy R01</i>		
		<i>Policy R01 (I) Dunton Hills Garden Village Strategic Allocation</i>		
		<i>A. In line with Policy SP02, land at Dunton Hills (east of the A128, south of the A127 and north of the C2C railway line, approximately 259.2 ha in size) is allocated for residential-led development to deliver Dunton Hills Garden Village.</i>		
		<i>B. The development will deliver a mix of uses to comprise at least 2,700 homes in the plan period (as part of an overall indicative capacity of around 4,000 homes with the remainder to be delivered beyond 2033) together with the necessary community, employment, utility, transport and green and blue infrastructure (GBI) to support a self-sustaining, thriving and healthy garden village.</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>C. Successful development of the site allocation will require:</p> <p>a. the masterplan to be underpinned by Garden Community principles and qualities</p> <p>b. proposals to creatively address the key site constraints and sensitively respond to the unique qualities and opportunities afforded by the historic landscape and environmental setting to deliver a distinctive and well-designed garden village in line with the Spatial Vision and Strategic Aims and Objectives for Dunton Hills Garden Village; and</p> <p>c. a holistic and comprehensive locally-led masterplan and design guidance to be developed, co-designed with relevant stakeholders to frame and guide the consistent quality and delivery across the site by different contractors over the delivery period.</p> <p>D. The proposed development will be required to deliver all the necessary supporting spatial components and infrastructure to address the specific site constraints, potential impacts of development and harness the site opportunities as set out by the strategic Dunton Hills aims and objectives. Permission for mixed-use development will be granted subject to the parameters and components specified below:</p> <p>a. delivery of at least 2,700 dwellings in the plan period providing a balanced variety of housing typologies and tenure and includes provision of self-build plots in line with Policy HP01; specialist accommodation in line with Policy HP04; and affordable housing in line with Policy HP05;</p> <p>b. the provision of a minimum of 5 serviced Gypsy and Traveler pitches, in line with Policy HP07(b);</p> <p>c. land (circa 5.5 ha) for employment space (in line with Policy PC03) to accommodate a creative range of creative employment uses suitable for a vibrant village centre and a predominantly residential area, i...</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24258 - Mr Jeffrey Goodwin [5004] 24259 - Mr Jeffrey Goodwin [5004] 24260 - Mr Jeffrey Goodwin [5004] 24261 - Mr Jeffrey Goodwin [5004] 24284 - Mr Max Aitkins [5790] 24285 - Mr Max Aitkins [5790] 24286 - Mr Max Aitkins [5790]	Object	<p>Brentwood Council is aware their Local Plan (at least in part) especially regarding DHGV is unsound. Again proves that the Planning Department officers lied when supplying information and why unable to answer simple basic questions. It appears the council deliberately want to proceed even though the facts quoted cannot be factually backed up as currently appear flawed and rigged. Appears council and the Council Leader, Louise Mckinley are trying their utmost to push through DHGV, without proper scrutiny, as concerned would not be passed by Planning Inspectorate if actual facts known. From their actions appears they do not want General Public or Residents to obtain information. Are unable to answer relevant questions with factual information, only waffle. Brentwood Council and the council leader are deliberately not responding to outstanding questions or emails (some nearly 2 months, well overdue) as appear extremely concerned that then could easily prove Reports have been Fabricated/Manipulated to misrepresent the best areas for development and in fact where the best areas are. E.g. Brentwood Council dismissed building 2,300 New Homes at Pilgrims Hatch for reasons given, however, the same and worse applies to Dunton. Brentwood Council admit unable to supply Masterplan or what Infrastructure will actually be provided (and have lied about for over 4 years) as is currently only their thinking, ifs/maybes and may never be built. In the submission for the £528,000 grant, listed 10 Key Milestones to be completed by October 2018, yet the council have admitted have not carry out any, so how can Brentwood Council be trusted.</p> <p><i>Remove DHGV from the plan</i></p>	DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23298 - West Horndon Parish Council (Mr Kim Harding) [381]	Object	It is vital that as linkages between West Horndon and DHGV are undertaken by non-vehicular modes, especially when the proposed primary school provision will be at DHGV. However there is no clear and credible plan for developing walking and cycling linkages between West Horndon and DHGV. With dedicated cycle routes in the order of 3km required to link West Horndon station into and through DHGV, an allowance of £1.8m for walkways and cycleways appears to be a gross under-estimate. The lack of certainty is reinforced by the IDP referring to 'feasibility studies' which is not available.  <i>Change not specifically identified.</i>	Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved.	No change
24256 - Mr Jeffrey Goodwin [5004] 24282 - Mr Max Aitkins [5790]	Object	The costs to ensure no problems at DHGV alone means site is unviable but then Brentwood's Political Bias & Greed takes over. DHGV is quoted as a self-sufficient site; however, Brentwood's Director of Strategic Planning has stated will rely on Basildon's Infrastructure. Thereby, all income profits go to Brentwood Council and year on year maintenance costs and problems fall on Basildon Council and its Residents. For Brentwood Council is a WIN - WIN situation: will receive over £36,000,000 from government and vast council tax with little outlay.  <i>Remove DSHGV from plan</i>	DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives. Further justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper. It is noted that as part of Duty to Cooperate and ahead of any planning application, consultation with adjoining councils is required to resolve service capacity issues as identified in the submission.	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23599 - Dunton Community Association (Mr Edward Cowen) [6185] 24254 - Mr Jeffrey Goodwin [5004] 24280 - Mr Max Aitkins [5790]	Object	The Dunton Hills Garden Village (DHGV) development would be adjacent to a Major Accident Hazard Pipeline. The eastern edge of the proposed DHGV site coincides with the Bacton to Horndon-on-the-Hill gas transmission line. This pipeline is classified as a Major Accident Hazard Pipeline.	Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved. Resolution of any potential issues is required prior to any planning determination on the site. Gas pipeline considerations are required. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives. Further justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper. Resolution of any potential issues is required prior to any planning determination on the site.	No change
		<i>In order to make the Plan justified DHGV should be removed from the Plan, and housing growth directed to safer areas of the Borough.</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24262 - Mr Jeffrey Goodwin [5004] 24263 - Mr Jeffrey Goodwin [5004] 24288 - Mr Max Aitkins [5790] 24289 - Mr Max Aitkins [5790]	Object	All consultations on Brentwood Councils Local Plan, have been bought into disrepute as no-one knows the real details/facts on the various proposed sites as Brentwood Council 'Keep On Moving The Goalposts', so how can anyone accurately comment? What are the facts and which are fiction! Have requested information NOW so have time to check the facts and stop this unethical development in its tracks, unless the council can supply accurate documentation which stands up to scrutiny! Factual information has been rigged / amended, given a different slant / representation by Brentwood Council. There are more points but this is enough for now, without listing them all. BRENTWOOD COUNCIL ARE LIKE THE PROVERB, 'A ROLLING STONE GATHERS NO MOSS', thereby they change details/comments at whim to whatever suits their purpose. VISIT <a href="http://WWW.DUNTONEXPLOITATION.CO.UK">WWW.DUNTONEXPLOITATION.CO.UK</a> FOR MORE ACCURATE INFORMATION.  <i>Remove DHGV from plan</i>	Noted. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives.	No change
24279 - Mr Max Aitkins [5790]	Object	The councils lack of professionalism is certainly outstanding, as no-one can trust your facts without checking. For better information and accurate facts, rather than Brentwood Councils waffle visit <a href="http://WWW.DUNTONEXPLOITATION.CO.UK">WWW.DUNTONEXPLOITATION.CO.UK</a> .  <i>Remove DHGV from plan</i>	Noted	No change
24255 - Mr Jeffrey Goodwin [5004] 24265 - Mr Jeffrey Goodwin [5004] 24273 - Mr Max Aitkins [5790] 24281 - Mr Max Aitkins [5790] 24290 - Mr Max Aitkins [5790]	Object	I object to DHGV because Brentwood borough intend to build well over 50% of their New Homes target (appears nearly 65%), SOUTH of the A127 which they consider OUTSIDE of Brentwood Districts AREA. It is obvious that Brentwood Council intends to build a New Town rather than a Garden Village and will use every means at their disposal to build DHGV even though; the Local Development Plans details after scrutiny, do not stack up. Brentwood Council's Local Development Plan will heavily impact on my life and more detailed structure including Infrastructure should be formalised prior to introduction.  <i>Remove DHGV from plan</i>	DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24146 - Mr Mr J Nicholls and Mr A Biglin (Land owners) [8368]	Object	<p>The eastern edge of the DHGV allocation follows the Borough boundary with Basildon. The new settlement would adjoin Basildon's Green Belt, leaving a narrow strip between DHGV and the existing built up area of Basildon. At one point, both Councils intended to locate new settlements in this location, however, Basildon no longer propose this, which calls into question whether the authorities have complied with the duty to co-operate.</p> <p><i>The Plan places significant reliance on the timely delivery of Dunton Hills Garden Village. This is not a positive strategy for meeting housing need and does not provide the flexibility required to address changes in circumstances. The allocation should be complemented by the allocation of small sites, to improve deliverability.</i></p>	<p>Noted. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives. Further justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper. In relation to deliver, the Council is of the view that DHGV can be delivered within the required timeframes as set out within the published trajectory. As part of the masterplan work, further information will be forthcoming on delivery of DHGV.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24272 - Mr Max Aitkins [5790]	Object	<p>Paragraphs 9.1 - 9.7</p> <p>CEG supports the general approach outlined in these paragraphs and agrees that the site allocations, including Dunton Hills Garden Village, reflect the spatial strategy and strategic objectives set out earlier in the Local Plan.</p> <p>CEG supports the approach of setting out of each policy by the sub-headings specified, although representations are made below on what is set out for DHGV in Policy R01.</p> <p>CEG supports the cross-reference to other policies in paragraph 9.4 to avoid unnecessary repetition in the Local Plan, but it should be noted CEG has submitted objections to Policy HP04. Consistent with paragraph 6.36 of the Local Plan, and to ensure the Plan is effective, the approach to affordable housing, including mix and tenure, should allow for some flexibility to provide for possible changes in circumstances over the lifetime of the Plan. This should then be carried forward into paragraph 9.17 iii, with reference made to viability as an important aspect which will inform the delivery approach, including the phasing of infrastructure, and legacy management. Modifications are proposed in our response.</p> <p><i>CEG sets out the modifications it considers are necessary to make Policy R01 sound, the reasons for which are explained in question no. 5 above. Other comments outlined above relating to the supporting text to Policy R01 are left for the Council to consider by way of minor modifications. The modification of Policy R01 in the manner set out below may require some of the supporting text to be aligned accordingly, in the manner described in response to question no. 5.</i></p> <p><i>Proposed Modifications to Chapter 9. Site Allocations Paragraph 9.4 should be amended for consistency with paragraph 6.36 and to ensure the Plan is effective. as follows:</i></p> <p><i>"Affordable housing should be provided in line with Policy HP05, as well as considerations for specialist housing, Policy HP04. Some flexibility may be required in relation to the approach to affordable</i></p>	<p>DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives.</p>	No change



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>housing and the phased delivery of infrastructure to ensure viable proposals come forward over the life of the Plan."</p> <p>Paragraph 9.17 iii. should be amended for the same reasons, as follows:</p> <p>"The Delivery Approach and Legacy Management - setting out the expectations for how the phased delivery of the scheme should be approached to ensure proposals are viable and embed an ethos of co-design and participation, timely and good governance in delivery, and an embedded legacy management of the village assets.</p> <p>Proposed Modifications to Policy R01</p> <p>Policy R01 (l) Dunton Hills Garden Village Strategic Allocation</p> <p>A. In line with Policy SP02, land at Dunton Hills (east of the A128, south of the A127 and north of the C2C railway line, approximately 259.2 ha in size) is allocated for residential-led development to deliver Dunton Hills Garden Village.</p> <p>B. The development will deliver a mix of uses to comprise at least 2,700 homes in the plan period (as part of an overall indicative capacity of around 4,000 homes with the remainder to be delivered beyond 2033) together with the necessary community, employment, utility, transport and green and blue infrastructure (GBI) to support a self-sustaining, thriving and healthy garden village.</p> <p>C. Successful development of the site allocation will require:</p> <p>a. the masterplan to be underpinned by Garden Community principles and qualities</p> <p>b. proposals to creatively address the key site constraints and sensitively respond to the unique qualities and opportunities afforded by the historic landscape and environmental setting to deliver a distinctive and well-designed garden village in line with the Spatial Vision and Strategic Aims and Objectives for Dunton Hills Garden Village; and</p> <p>c. a holistic and comprehensive locally-led masterplan and design guidance to be developed, co-designed with relevant stakeholders to frame and guide the consistent quality and delivery across the site by different contractors over the delivery period.</p> <p>D. The proposed development will be required to deliver all the necessary supporting spatial</p>		

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
		<p>components and infrastructure to address the specific site constraints, potential impacts of development and harness the site opportunities as set out by the strategic Dunton Hills aims and objectives. Permission for mixed-use development will be granted subject to the parameters and components specified below:</p> <p>a. delivery of at least 2,700 dwellings in the plan period providing a balanced variety of housing typologies and tenure and includes provision of self-build plots in line with Policy HP01; specialist accommodation in line with Policy HP04; and affordable housing in line with Policy HP05;</p> <p>b. the provision of a minimum of 5 serviced Gypsy and Traveler pitches, in line with Policy HP07(b);</p> <p>c. land (circa 5.5 ha) for employment space (in line with Policy PC03) to accommodate a creative range of creative employment uses suitable for a vibrant village centre.</p>		
<p>22388 - Dr Philip Gibbs [4309]</p> <p>23428 - Ms Rachael Mellor [8321]</p> <p>23593 - Dunton Community Association (Mr Edward Cowen) [6185]</p> <p>23594 - Dunton Community Association (Mr Edward Cowen) [6185]</p> <p>23595 - Dunton Community Association (Mr Edward Cowen) [6185]</p> <p>23597 - Dunton Community Association (Mr Edward Cowen) [6185]</p> <p>23598 - Dunton Community Association (Mr Edward Cowen) [6185]</p> <p>23616 - Dunton Community Association (Mr Edward Cowen) [6185]</p>	Object	<p>Of the potential Green Belt development sites in the Borough the Dunton Hills Garden Village (DHGV) site has been professionally assessed as one of the most harmful to the Green Belt and least suitable for development. An independent consultant, Crestwood Environmental, instructed by the Authority, carried out a Borough-wide Green Belt Assessment in 2016 and assessed the DHGV site as High, the highest of the 5 levels used. "High", in the assessment, signified that the area scored particularly well as to fulfilling the five recognised purposes of the Green Belt. Accordingly development would be particularly damaging to the Green Belt at the DHGV site. Only 4% of the 203 sites assessed were judged High. In terms of harm to the Green Belt the DHGV site is therefore among the 4% worst places to develop in the Borough.</p> <p><i>Of the potential Green Belt development sites in the Borough the Dunton Hills Garden Village (DHGV) site has been professionally assessed as one of the most harmful to the Green Belt and least suitable for development. Remove Dunton Hills Garden Village from the plan.</i></p>	<p>Noted. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives. Further justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper.</p>	Refer to Dunton Hills topic paper.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23998 - Bellway Homes and Crest Nicholson [8351]	Support	<p>The TA identifies a number of junctions that would need to be improved across the Borough to support the development proposed in the Local Plan. However, the Local Plan Submission Version does not include reference to these. As an example, the following table contains the identified improvements in the surrounding roads to Dunton Hills Garden Village: (see attachment). The IDP contains a similar table for highway infrastructure improvements and those relevant to Dunton Hills Garden Village are listed in Table 3 below: (see attachment).</p> <p><i>Reference to required junction improvements should be within the Plan</i></p>	Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved. As part of Duty to Cooperate, Brentwood Borough Council are working with transport authorities to address any transport impacts. It is noted that the DHGV proposal is indented to provide a sustainable transport development that will minimise any impact to surrounding areas. The local plan correlated to the IDP which has been updated and will be publicly available ahead of local plan submission.	Refer to updated Infrastructure Delivery Plan
23714 - Ms Heather Dunbar [8337]	Support	<p>Policy R01, Dunton Hills Garden Village is not in principle objected to provided that no further development in dwelling numbers are allocated to this very large site. At 2,700 dwellings these are a substantial number and part of meeting local housing need and these will take time to build and supply. It is all the more important that smaller, readily developable sites, such as that at Sow N Grow Nursery and land at 346 Ongar Road can be brought forward quickly and readily and without undue constraints to accord with para. 68 of the NPPF</p> <p><i>No change proposed</i></p>	Support welcomed. It is noted that there will be 2,770 homes located on the site allocation as a result of response to Regulation 19 consultation. This will ensure the housing need it met over the lifetime of the plan period. In relation to delivery, the Council is of the view that DHGV can be delivered within the required timeframes as set out within the published trajectory. As part of the masterplan work, further information will be forthcoming on delivery of DHGV.	No further action
24000 - Bellway Homes and Crest Nicholson [8351]	Support	<p>Dunton Hills Garden Village has followed a robust Green Belt review; Sustainability Appraisal; and site selection process. The draft plan does not allocate land between Dunton Hills Garden Village and West Horndon; therefore it maintains physical separation and avoids the coalescence of the new settlement and existing built up area of West Horndon.</p> <p><i>No change proposed</i></p>	Support welcomed. Noted. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Background</i>				
23976 - CEG Land Promotions Limited [5050]	Object	<p>Background, paragraphs 9.8 - 9.14</p> <p>CEG supports the selection of DHGV as a Strategic Allocation, which is consistent with policy in the National Planning Policy Framework (NPPF) which the Local Plan refers to in paragraph 9.8.</p> <p>CEG supports the strategy that in Brentwood the supply of new homes can best be achieved by the planning of DHGV in the way proposed by the Council in combination with the other allocations. The site of DHGV is well located, the proposals will be well designed and supported by the necessary infrastructure and facilities, in accordance with paragraph 72 of the NPPF.</p> <p>It is noted that the Local Plan (paragraph 9.10) refers to the fact that the Strategic Allocation at Dunton Hills was selected to meet the 'majority' of Brentwood's housing need, but this overstates the position as it gives the impression it will deliver more than half. The Strategic Allocation will meet 35% of the housing need over the plan period - which would be more appropriately described as a 'significant proportion' of Brentwood's housing need. The significant majority of the need will be met from a range of other sites across the Borough. A minor modification is suggested to clarify this matter.</p> <p>CEG supports the Council's general approach to determining where housing needs should be met and the unique opportunity to deliver a sustainable new settlement at DHGV. CEG also agrees that this approach aligns with the Borough of Villages character explained elsewhere in the Local Plan, and would continue to maintain characteristics of Green Belt openness.</p> <p><i>Correct paragraph 9.10 to clarify proportion of new homes proposed at Dunton Hills Garden Village</i></p>	Factual clarification of use of the phrase majority of Brentwood's housing need proposed.	Consider minor factual change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>9.10</i>				
22204 - Mr Christopher Garside [8210]	Object	At 06:30 in the morning the A127 is crawling with traffic London bound. The link roads to the A13 are insufficient to carry traffic via that route. Trains through West Horndon are already full at 07:00 in the morning. No additions to infrastructure are stated in the plan.  <i>Put the infrastructure in first.</i>	Comment is noted. Work on transportation impacts and infrastructure is being considered and is to be further detailer in the Infrastructure Delivery Plan and the DHGV master planning. Local plan policies consider vehicular impact of new development.	No change
22584 - Mr Sasha Millwood [4539]	Object	I do not want any reduction in Green Belt Boundaries ever. Not now, not in the next Plan period. According to the NPPF, the Green Belt is supposed to be "permanent". Making such a massive reduction would set a precedent for the Green Belt being regarded as a "managed reduction in green space" rather than a "permanent" amenity. Previous consultations have shown an overwhelming majority against any development of this sort.  <i>Eliminate proposal for Dunton Hills Garden Village.</i>	DHGV has been chosen as a strategic location for the Brentwood Borough Council's housing Growth, with consideration of the evidence base.	No change
22334 - Miss Caroline May [7169]	Object	I object to this statement as Dunton Hills Garden Village site is not sustainable due to the size of the development. This is not sustainable due to the proposal being in a high flood risk area with no proper plan in place to mitigate against future flooding. It is also not sustainable in terms of infrastructure. The road network can not cope with current levels of traffic, let alone a development of this size. How this could reasonably be accommodated has not been evaluated. The rail network again can not cope with this size of development area. Generally the environmental impact is huge.  <i>The proposed development on this site the is simply too large. It is trying to focus significant build all in one area where it it not feasible to do so for some very practical reasons.</i>	DHGV has been chosen as a strategic location for the Brentwood Borough Council's housing Growth, with consideration of the evidence base.	No change

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*Representations**Nature**Summary of Main Issue/Change to Plan**Council's Assessment**Action*

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*A Spatial Vision for Dunton Hills*

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23978 - CEG Land Promotions Limited [5050]	Object	<p>DHGV Strategic Aims and Objectives, paragraphs 9.19 - 9.22</p> <p>CEG generally supports the three Strategic Aims and Objectives and the contents of each of them. However, the relationship of these Strategic Aims and Objectives (paragraphs 9.20 - 9.22), the three policy domains (paragraph 9.17), and the Development Principles (paragraph 9.23) is unclear.</p> <p>In paragraph 9.19 it indicates that the three overarching aims, each supported by sub-objectives, provide the link between the vision - presumably the Spatial Vision for Dunton Hills - and the development strategy. It then states that these form the fundamental development principles to help shape and inform the development of a masterplan and guide decision-taking.</p> <p>CEG considers clarity should be provided in the text at paragraph 9.19, on how the Strategic Aims and Objectives inform Policy R01, this being the policy against which a masterplan and a planning application for development at DHGV will ultimately be determined. Such clarity could be provided by stating that the Strategic Aims and Objectives underpin the requirements of the Policy R01 and the supporting text in paragraphs 9.24 - 9.89 provides further guidance on the application of that policy.</p> <p>With respect to paragraph 9.20 (iii) the wording is potentially onerous and inconsistent with national policy. It relates to heritage assets so the reference to natural assets should be removed or the title changed. With respect to the heritage aspects it should refer to the desirability of sustaining and enhancing the significance of heritage assets in line with paragraph 185 of the NPPF.</p> <p><i>CEG considers clarity should be provided in the text at paragraph 9.19, on how the Strategic Aims and Objectives inform Policy R01, this being the policy against which a masterplan and a planning application for development at DHGV will ultimately be determined. Such clarity could be provided by stating that the Strategic Aims and Objectives underpin the requirements of the Policy R01 and the supporting</i></p>	Amendment or clarification of this is considered unnecessary to clarify the requirements of the policy.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p><i>text in paragraphs 9.24 - 9.89 provides further guidance on the application of that policy.</i></p> <p><i>With respect to paragraph 9.20 (iii) the wording is potentially onerous and inconsistent with national policy. It relates to heritage assets so the reference to natural assets should be removed or the title changed. With respect to the heritage aspects it should refer to the desirability of sustaining and enhancing the significance of heritage assets in line with paragraph 185 of the NPPF.</i></p>		
<i>9.14</i>				
23977 - CEG Land Promotions Limited [5050]	Support	<p>A Spatial Vision for Dunton Hills, paragraphs 9.14 - 9.18</p> <p>CEG supports the spatial vision as expressed in this part of the Local Plan (paragraphs 9.14 - 9.18), and as set out in the three interrelated policy domains, namely site requirements; the spatial design; and the delivery approach and legacy management. These three domains are then carried forward into the presentation of Policy R01 itself, and this approach is generally supported.</p> <p><i>No change proposed</i></p>	Support welcomed	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>9.17</i>				
23980 - CEG Land Promotions Limited [5050]	Object	<p>Paragraph 9.4 should be amended for consistency with paragraph 6.36 and to ensure the Plan is effective. as follows:</p> <p>"Affordable housing should be provided in line with Policy HP05, as well as considerations for specialist housing, Policy HP04. Some flexibility may be required in relation to the approach to affordable housing and the phased delivery of infrastructure to ensure viable proposals come forward over the life of the Plan."</p> <p>Paragraph 9.17 iii. should be amended for the same reasons, as follows:</p> <p>"The Delivery Approach and Legacy Management - setting out the expectations for how the phased delivery of the scheme should be approached to ensure proposals are viable and embed an ethos of co-design and participation, timely and good governance in delivery, and an embedded legacy management of the village assets.</p> <p><i>"The Delivery Approach and Legacy Management - setting out the expectations for how the phased delivery of the scheme should be approached to ensure proposals are viable and embed an ethos of co-design and participation, timely and good governance in delivery, and an embedded legacy management of the village assets.</i></p>	<p>Noted. The proposed modifications Policy HP04 are not agreed. Phased delivery of infrastructure is irrelevant in the same context.</p> <p>Disagree: should be amended to say "to ensure impacts are adequately mitigated". If proposals are not viable this triggers a different scope of assessment (i.e. viability assessment in case proposals are non-compliant with AH policy). Paragraph 9.17 should be retained. If proposals are not viable this triggers a different scope of assessment (i.e. viability assessment in case proposals are non-compliant with affordable housing policy).</p>	No change
<i>DHGV Strategic Aims and Objectives</i>				
22525 - Mr Adam Smith [8264]	Support	<p>The landowner fully supports the allocation for DHGV and will co-operate with the Local Planning Authority and other affected landowners to help bring the proposal to fruition</p> <p><i>No change proposed</i></p>	Support welcomed	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.20</b>				
22435 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective. To be consistent with the wording associated with DH01f the title should include the word 'Active'.</p> <p><i>Amend DH01f as follows - DH01f: Active and Sustainable Travel</i></p>	The change is considered minor in nature and therefore is not recommended. Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved.	No change
22316 - Essex Bridleways Association (Mrs Sue Dobson) [3855]	Object	<p>We have already made reference within the main body of the Plan regarding the need to provide safe, off-road routes for ALL vulnerable road users - pedestrians, cyclists and equestrians and the disabled, rather than the walker/cyclists bias that this Plan states at the moment.</p> <p><i>To make this Plan sound, we suggest that the strategic policies for DHGV incorporate multi-user paths suitable for ALL users as default, and to ensure connectivity for all vulnerable road users across the major roads/railway forming the site's boundary.</i></p>	Noted. The changes are considered minor in nature and through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (I), detailed planning requirements as identified in the submission will be considered and resolved.	No change
22399 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Object	<p>DH01b: LANDSCAPE-LED. With regards to DH01b, we are disappointed to note that there is no mention of net gains. In order to accord with the NPPF and to deliver a genuinely sustainable development, there must be a policy commitment to deliver no net loss, and aim to deliver a measurable net gain in biodiversity.</p> <p>We would advise that the policy should be amended to include this.</p> <p><i>...to deliver a healthy, walkable and climatically adapted public realm and "richly biodiverse" multi-functional green and blue infrastructure, amongst the backdrop views of the Essex countryside</i></p>	Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved.	No change to local plan

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>9.21</i>				
22436 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified</p> <p>4. Consistent with National Policy.</p> <p>The type or types of school that will best serve Dunton have yet to be properly considered and cannot be determined at this stage. The important consideration at this stage is ensuring appropriate opportunities for all learners of all ages. The DfE regulations for establishing a new school include appropriate consultation requirements that would be prejudiced by an assumption that any new school must be 'all through'. DH02b should be amended to reflect this.</p> <p><i>Amend DH02b as follows -</i></p> <p><i>DH02b: ALL THROUGH LEARNING. Development that delivers exemplar education facilities that meet the needs of all types of learners through life, from nursery to adult learning opportunities.</i></p>	<p>The change is considered minor in nature and therefore is not recommended. Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.23</b>				
23979 - CEG Land Promotions Limited [5050] 23988 - CEG Land Promotions Limited [5050]	Object	<p>the relationship of the Development Principles (paragraph 9.23) with the three policy domains (paragraph 9.17) and the Strategic Aims and Objectives (paragraphs 9.20 - 9.22) is unclear. CEG questions whether the Development Principles are necessary or couldn't be incorporated within the Strategic Aims and Objectives, notwithstanding the fact it generally supports what they are seeking to achieve.</p> <p>CEG considers that if the Development Principles are retained further clarity should be provided in the text at paragraph 9.23, on the relationship with Policy R01, this being the policy against which a masterplan and a planning application for development at DHGV will ultimately be determined.</p> <p>CEG objects to paragraph 9.23 (i) where Green Belt, landscape capacity and environmental impacts are conflated within a development principle entitled Design and Build with Nature. New Green Belt boundaries will be clearly defined with the Strategic Allocation using physical features that are readily recognisable and Green Belt isn't a landscape or environmental designation, in any event. The reference to Green Belt should be removed.</p> <p><i>reference to Green Belt in para 9.23 (i) should be removed</i></p>	Amendment or clarification of this is considered unnecessary to clarify the requirements of the policy.	No change
22400 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Support	<p>The development should protect and retain existing wildlife habitats, such as Eastlands Spring LoWS, hedgerows, etc. and connect them with wildlife-rich gardens, verges, amenity green space, cycle paths and walkways. The aim should be to create a network of natural green corridors weaving through the development, into the surrounding urban and rural landscapes and contributing to the wider ecological network.</p> <p><i>No specific change to the plan proposed</i></p>	Support for protection and retention of wildlife habitat noted	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22383 - Sport England (Mr. Roy Warren) [4294]	Support	Sport England supports the 'Healthy' development principle as this would be consistent with Government policy in paragraph 91 of the NPPF in relation to planning policies enabling and supporting healthy lifestyles.  <i>No change proposed</i>	Support welcomed	No further action

## POLICY R01 (I): DUNTON HILLS GARDEN VILLAGE STRATEGIC ALLOCATION

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY R01 (I): DUNTON HILLS GARDEN VILLAGE STRATEGIC ALLOCATION</i></b>				
24142 - Mr Mr J Nicholls and Mr A Biglin (Land owners) [8368]	Object	<p>Whilst we do not object to the principle of a new settlement, we do not consider that it should be relied upon to deliver such a significant proportion of the Borough's housing need within the timeframe envisaged. There are both generic and site-specific constraints to delivery, the reliance on this strategic allocation to demonstrate and maintain a five-year supply in the early Plan period would result in the Plan to fail the tests of soundness. Such a significant reliance on a single site within a Local Plan is not a sustainable approach to meet housing need.</p> <p><i>The Plan places significant reliance on the timely delivery of Dunton Hills Garden Village. This is not a positive strategy for meeting housing need and does not provide the flexibility required to address changes in circumstances. The allocation should be complemented by the allocation of small sites, to improve deliverability.</i></p>	<p>DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives. Further justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper. It is noted that there will be 2,770 homes located on the site allocation as a result of response to Regulation 19 consultation. This will ensure the housing need it met over the lifetime of the plan period. The strategy as proposed includes justification for the site allocations, alternative / additional sites have been considered but have not been selected. The Council is of the view that DHGV can be delivered within the required timeframes as set out within the published trajectory. As part of the masterplan work, further information will be forthcoming on delivery of DHGV. There is a requirement in the NPPF to have a flexible supply of locations for new development to meet housing need (NPPF paragraph 68). This includes sufficient homes for the initial five years supply as well as sites of various sizes so they can brought forward for development. The Council does not want to rely too heavily on one site to meet the borough's development needs.</p>	No change

## POLICY R01 (I): DUNTON HILLS GARDEN VILLAGE STRATEGIC ALLOCATION

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22437 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>The DHGV allocation is now based on an overall 4,000 homes rather than the 3,500 ECC have previously tested. BBC has previously been advised that the higher number would require a further 2.1ha site for a primary school. This amendment needs to be made to point D(e) &amp; (f).</p> <p><i>Amend Policy R01 (I) D. e. &amp; f. as follows -</i></p> <p><i>e. land (circa 2.1 hectares each) for three co-located primary school and early years and childcare nurseries (Use Class D1)</i></p> <p><i>f. land (circa 0.13 hectares each) for one stand-alone early years and childcare nursery (Use Class D1)</i></p>	<p>The Council welcomes the response and through ongoing Duty to Cooperate discussion, School requirements are set out by Essex County Council (ECC) and DHGV is providing schools in accordance with ECC requirements. Changes are accepted in accordance with submission as a result of ongoing discussions.</p>	<p>Agree to amend to add 2.1 ha to school provision area in DHGV.</p>

## POLICY R01 (I): DUNTON HILLS GARDEN VILLAGE STRATEGIC ALLOCATION

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23161 - Thurrock Borough Council (Mr Richard Hatter) [2461]	Object	<p>Thurrock Council considers the Brentwood Local Plan is unsound due to the proposal for a large free-standing settlement identified as Dunton Hills Garden Village (DHGV). Thurrock Council has made representations setting out its concern at the previous consultation stages of the Brentwood Local Plan in 2016 and 2018 and in its correspondence and meetings with Brentwood Council officers. Other representations covering issues relating to DHGV are covered under Duty to Cooperate and Spatial Strategy and the evidence base.</p> <p>Specifically: Lack of technical evidence; Concept of a free standing village; Masterplanning approach; Green Belt Issues; Landscape Impact; Deliverability and phasing; Viability; Impact on Thurrocks Housing Market; Infrastructure and Public Expenditure Funding; Road Traffic and Transport Evidence; Sustainability Appraisal of the Site; Duty to Cooperate.</p> <p><i>It is considered the Brentwood Draft Local Plan and supporting evidence base will require further major revision and consultation with ongoing duty to cooperate with adjoining local authorities. In particular the preparation of the draft Brentwood Local Plan should be reviewed to take account of the outcome of testing of other spatial options being considered including the evidence by the South Essex authorities as part of the preparation of a Joint Strategic Plan.</i></p>	<p>Noted. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives. Further justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper. The spatial strategy as proposed includes justification for the site allocations, alternative/additional sites have been considered but have not been selected. The Council is of the view that DHGV can be delivered within the required timeframes as set out within the published trajectory. As part of the masterplan work, further information will be forthcoming on delivery of DHGV. There is a requirement in the NPPF to have a flexible supply of locations for new development to meet housing need (NPPF paragraph 68). This includes sufficient homes for the initial five years supply as well as sites of various sizes so they can brought forward for development. The Council does not want to rely too heavily on one site to meet the borough's development needs. Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved.</p>	No change



## POLICY R01 (I): DUNTON HILLS GARDEN VILLAGE STRATEGIC ALLOCATION

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p><i>Further work is required to develop the evidence base including the justification for the selection of the spatial options and dismissal of reasonable alternatives, housing capacity and supply further transport evidence and other infrastructure.</i></p> <p><i>Due to the issues highlighted in this response and to the earlier documents it is considered that Brentwood Council needs to carefully consider how it proceeds with the preparation of the Local Plan and the timetable for its production. It is recommended that the Brentwood Plan with its current spatial strategy and site allocations should not be submitted for Examination.</i></p>		
22438 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>4. Consistent with National Policy.</p> <p>Reference to garden communities should be consistent with the guidance referred to in paragraph 9.14, and in paragraph 72 of the NPPF.</p> <p>Recommend amending criterion C. a. of Policy R01 (I) to reflect this.</p> <p><i>Amend Policy R01 (I) C. a. as follows -</i></p> <p><i>The masterplan to be underpinned by Garden City Principles and qualities;</i></p>	Change considered minor and not required. It is considered DHGV principles are underpinned and based on Garden City Principles and qualities.	No change

## POLICY R01 (I): DUNTON HILLS GARDEN VILLAGE STRATEGIC ALLOCATION

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22439 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>In respect of DHGV, ECC strongly support the masterplan approach and the reference to Garden City Principles, together with the integration of the provision of education, employment space and community facilities within the site allocation. However due to its location the site will need to reply upon and embed sustainable transport measures, as required in the DHGV policies, to mitigate impacts on the highway network. Such measures will be informed by the outputs of the transport evidence, which is still to be completed.</p> <p><i>BBC need to include within the Plan evidence, particularly in respect of transport, the site specific, local and cumulative impact on the local and strategic transport network, to demonstrate that the spatial strategy is the most appropriate.</i></p>	Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved. As part of Duty to Cooperate, Brentwood Borough Council are working with transport authorities, including ECC to address any transport impacts. It is noted that the DHGV proposal is indented to provide a sustainable transport development that will minimise any impact to surrounding areas. The local plan correlated to the IDP which has been updated and will be publicly available ahead of local plan submission.	Provision of proportionate evidence as required. No change to the plan.

## POLICY R01 (I): DUNTON HILLS GARDEN VILLAGE STRATEGIC ALLOCATION

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22836 - Lisa Atkinson [2991] 22842 - Mr Ian Atkinson [2993]	Object	<p>The C2C rail line only has two tracks and the trains are already well above capacity at peak times. The roads around the village (A127, A128) are characterised by standstills and queues in both the morning and evening peaks. An additional 500 cars would have a very material impact on already severely strained and congested roads. It is not feasible for these roads to cope with the proposed development at Dunton Hills Garden Village and the proposed development by other councils, even with investment. It is also impossible to see how the train capacity could be upgraded sufficiently.</p> <p><i>The C2C rail line only has two tracks and the trains are already well above capacity at peak times. The roads around the village (A127, A128) are characterised by standstills and queues in both the morning and evening peaks. An additional 500 cars would have a very material impact on already severely strained and congested roads. It is not feasible for these roads to cope with the proposed development at Dunton Hills Garden Village and the proposed development by other councils, even with investment. It is also impossible to see how the train capacity could be upgraded sufficiently.</i></p>	Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved. As part of Duty to Cooperate, Brentwood Borough Council are working with transport authorities to address any transport impacts. It is noted that the DHGV proposal is indented to provide a sustainable transport development that will minimise any impact to surrounding areas. The local plan correlates to the IDP which has been updated and will be publicly available ahead of local plan submission. Part of the ongoing consultation includes consultation with C2C and increase in capacity for West Horndon Station.	No change

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23164 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>Unclear from the published methodology, as to why, having scored highly in relation to Purpose 1 and 3, DHGV is assessed as making a "moderate to high" contribution to Green Belt purposes, when there are other parcels which make high contributions towards two of the purposes have been assessed as making a "high" contribution towards Green Belt purposes. Basildon Council does not believe that the Plan has reached a justified position in respects of whether the Green Belt evidence has informed the policies. Unclear how the risk of coalescence can be adequately mitigated.</p> <p><i>The Plan should demonstrate in more detail, through a tool such as a Topic Paper, how its site selection choices have been informed by the Green Belt Study 2018 and should any inconsistencies occurs the Plan's land use allocations and justification should be changed.</i></p>	<p>Noted. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives.</p>	No change
23347 - Mrs Carol Minter [2999]	Object	<p>Regarding Potential dedicated bus routes: The Council are living in Never Never Land if they think people will use alternative forms of transport to the car .... people will use cars! West Horndon station is a 2 platform station which barely copes (in the rush hour) with the sudden impact of hundreds of people descending on such a tiny space. There is very little parking space and nowhere to allocate further spaces.</p> <p><i>Object to DHGV, remove from plan</i></p>	<p>Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (I), detailed planning requirements as identified in the submission will be resolved. As part of Duty to Cooperate, Brentwood Borough Council are working with transport authorities to address any transport impacts. It is noted that the DHGV proposal is indented to provide a sustainable transport development that will minimise any impact to surrounding areas. The local plan correlates to the IDP which has been updated and will be publicly available ahead of local plan submission.</p>	No change

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23170 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>Delivery of DHGV will commence in 2022/23 at a rate of 100 homes per annum, climbing to 300 homes per annum by 2026/27. This seems overly optimistic given that the allocation is currently within Green Belt, requires masterplanning and will need to go through a planning application and elements of the condition discharge process before development can commence. No evidence is provided as to how the housing trajectory has been developed. No evidence or any form of a development framework / masterplan for DHGV explains how the proposed accelerated rate of delivery will be possible.</p> <p><i>Basildon Council therefore seeks for evidence to be provided demonstrating the realistic delivery trajectory for DHGV so that the potential short-medium term pressures on services and facilities in nearby settlements can be assessed, understood and planned for by service providers and neighbouring authorities. This will help ensure adequate mitigation provisions can be put in place to reduce any potential negative impacts on Basildon Borough residents living nearby. This will make the Plan justified and effective.</i></p>	<p>The strategy as proposed includes justification for the site allocations, alternative/additional sites have been considered but have not been selected. The Council is of the view that DHGV can be delivered within the required timeframes as set out within the published trajectory. As part of the masterplan work, further information will be forthcoming on delivery of DHGV. There is a requirement in the NPPF to have a flexible supply of locations for new development to meet housing need (NPPF paragraph 68). This includes sufficient homes for the initial five years supply as well as sites of various sizes so they can be brought forward for development. The Council does not want to rely too heavily on one site to meet the borough's development needs. It is expected that a masterplan Framework and Supplementary planning Document will be completed ahead of any determination on the site. Basildon Council have been a part of this through Duty to Cooperate measures and will be in an ongoing manner.</p>	No change

## POLICY R01 (I): DUNTON HILLS GARDEN VILLAGE STRATEGIC ALLOCATION

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24137 - Mr Iain Low [5329]	Object	<p>The subject land in the ownership of Mr Low, site plan enclosed at Appendix A, has an area 6.5 acres. The site comprises of Mr Low's residential property and adjoining land which lies immediately adjacent to the junction of the A128 / A127. Mr Low supports the allocation of the site and the removal of the land from the Green Belt as identified in the Draft Local Plan. Mr Low is keen to work with the Planning Authority and the promoter of the Garden Village in bringing forward the land for development. There is, however, no formal agreement between Mr Low and CEG in place in regard to future proposals on this site. It is surprising that the Local Plan is now at an advanced stage yet there remains uncertainty regarding the role of the landowners and promoters in respect of the Garden Village. This calls in question the deliverability of the landholding and Mr Low is keen that this matter is clarified in advance of the submission of the Local Plan to the Secretary of State. The Strategic Housing Allocation R01 incorporates the subject site owned by Mr Low. However contrary to the statement at 9.6 of the Local Plan, there is no reference to joint working between landowners in the Local Plan Policy R01. This needs to be clarified and addressed as the policy in its current form is undeliverable given there is more than one party involved in the garden village allocation. In terms of the tests of soundness this omission in the Draft Local Plan results in the policy not being justified or effective as it is currently prepared.</p> <p><i>The Local Plan should reflect the fact that there is more than one party involved in DHGV allocation. Mr Low would welcome greater formal commitment from CEG regarding the future of the site, in advance of the Examination in Public on the Local Plan.</i></p>	<p>Noted. No change is proposed to paragraph 9.6. Through the governance arrangements for DHGV, a Masterplan Framework is being prepared and Supplementary Planning Document that applies to the who site allocation. This is being prepared in collaboration with landowners and other stakeholders. This does not preclude the ability for any landowners to bring forward an application for their land. Any arrangements between CEG and other landowners should be agreed between those parties</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22894 - Mr Derrick Fellowes [4361] 22895 - Mr Derrick Fellowes [4361] 22896 - Mr Derrick Fellowes [4361] 22897 - Mr Derrick Fellowes [4361] 22898 - Mr Derrick Fellowes [4361] 22899 - Mr Derrick Fellowes [4361] 22900 - Mr Derrick Fellowes [4361]	Object	<p>There are far too many homes: 4,000 in the overall timeframe will produce in the region of 10,000 inhabitants, 8,000 vehicles. It will impact on the already overloaded A127, A13, A128. The A128 is a single track road. Local roads will not be able to accommodate the vast increase in vehicles and vehicle movements. The additional volume of traffic will cause congestion, and unhealthy and dangerous levels of toxicity. Parking at West Horndon and Laindon stations do not have the capacity. Schools: the local infrastructure will be unable to cope with the increase in population numbers. Doctor surgeries: the local infrastructure will be unable to cope with the increase in population numbers. This is destruction of precious greenfield site in an area that has to be retained to assist in keeping the air that we breathe as pure as possible, especially in these times of high levels of pollution. This development will displace, and most likely kill several protected species of wildlife. This development will destroy the ancient Dunton Wayletts settled community. This development is being used as a apolitical pawn, and is bearing the major load of the Brentwood additional homes (initially 2,000 rising to 4,000) in the Local Plan, which is far out of balance with the spread of housing numbers in other parts of the Borough.</p> <p><i>Remove DHGV from the plan</i></p>	Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved. As part of Duty to Cooperate, Brentwood Borough Council are working with transport authorities to address any transport impacts. It is noted that the DHGV proposal is indented to provide a sustainable transport development that will minimise any impact to surrounding areas. The local plan correlated to the IDP which has been updated and will be publicly available ahead of local plan submission. Part of the ongoing consultation includes consultation with C2C and increase in capacity for West Horndon Station.	No change

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22945 - Mr Kevin Craske [2712] 22947 - Mr Kevin Craske [2712] 22949 - Mr Kevin Craske [2712]	Object	<p>The Green Belt around West Horndon and Dunton is meant to prevent the urban sprawl of London creeping along the A127 and A13 corridors. This is the most important part of the green belt in the whole country due to the extreme pressure on housing needs in the South East of England. To state that the Green Belt area around the A12/Shenfield area is somehow more important or of greater character is risible and frankly insults the intelligence. The Green Belt area around West Horndon is so far unaffected but will be completely ripped apart by this plan. No surveys or work have been carried out prior to the issue of the LDP with reference to the flooding. West Horndon and Dunton are in a geographical dip between higher ground in all directions. In the past we have experienced several floods including my own property. It is not sensible to put all this additional housing in flood prone areas and to consider doing this without even basic land surveys is poor practise to say the very least. West Horndon and Dunton are adjacent to Basildon and Thurrock Boroughs. Both Boroughs are also considering the Dunton area for their own housing expansion needs so Dunton Village could end up as Dunton Town. Both councils have stated that there has been very limited consultation about perceived infrastructure or transport planning and do not seem to be very much in favour of Brentwood Borough future local development proposals. This is at odds with the statement in your LDP about local joint consultations with neighbouring boroughs. This is symptomatic of a lack of joined up thinking in the planning process.</p> <p><i>Remove DHGVf rom the plan</i></p>	<p>Noted. DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This also includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives. As part of the preparation of the Masterplan Framework and any planning application that comes forward on the DHGV site, flooding mitigation measures are required.</p>	No change



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23989 - CEG Land Promotions Limited [5050]	Object	<p>CEG generally supports Policy R01(I) and what it is seeking to achieve, subject to the representations outlined below.</p> <p>Criterion A</p> <p>There is a very small difference between the size of the site set out in criterion A (and paragraph 9.12) and that contained in Appendix 2. The difference is insignificant but a minor modification would ensure consistency.</p> <p>Criterion B</p> <p>CEG proposes wording changes to ensure the presentation of the number of new homes is consistent with criterion D, insofar as the number to be provided over the plan period is presented as a minimum, and to ensure the plan is positively prepared in this regard.</p> <p>Criterion D</p> <p>CEG proposes wording changes for reasons of clarity and to provide some limited flexibility, for example, in the amount of land to be provided for employment space, consistent with the approach adopted elsewhere in the policy for other uses.</p> <p>With respect to sub-criterion (a) CEG supports reference to the provision of a variety of housing typologies and tenures which will help create a holistic new settlement in line with garden community principles and assist in delivering the new homes at DHGV.</p> <p>With respect to sub-criterion (d) and (e) CEG objects to the references to co-location which are considered too prescriptive and the policy is not justified. CEG considers that sub-criterion (e) should refer to two primary schools, 'preferably co-located' with early years and childcare nurseries, which would make this consistent with the wording of paragraph 7.100 of the Local Plan.</p> <p>As far as sub-criterion (d) is concerned CEG</p>	<p>Location of the school and education facilities is considered fundamental to DHGV and therefore no change is required. The only change required is in relation to updating the needs requirements to meet ECC capacity requirements.</p> <p>It is noted that ongoing discussions are being undertaken with ECC as part of pre-application requirements and Duty to Cooperate. It is intended that a minimum requirements should be retained to assure the amount of green and blue infrastructure is delivered.</p>	No change

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		<p>considers that the reference to co-location should be removed, with the location of the secondary school left to be determined in the masterplan process, in consultation with relevant stakeholders including Essex County Council; or reference made in the Social Infrastructure section to the potential benefits of co-location in Policy R01 (II) which deals with the Spatial Design of DHGV.</p> <p>With respect to sub-criterion (h) CEG generally supports the proportion of the total land area of the Strategic Allocation that policy requires for green and blue infrastructure (GBI). However, CEG objects to the fact the figure is presented as a minimum requirement which is prescriptive and considers that some limited flexibility is required in this figure, consistent with how other land uses are presented in the policy. CEG also considers that policy should clarify that GBI includes private gardens and green roofs to make the measurement basis clearer.</p> <p>CEG considers that there is considerable opportunity for high quality GBI which will be a significant feature of DHGV and central to the achievement of garden community principles. CEG fully supports its inclusion and generally supports the policy relating to the spatial design for GBI outlined in Policy R01 (II). CEG considers this should inform the overall amount of GBI that is provided, as well its design; and that the precise amount and design of GBI should flow out of the masterplan process. This will ensure the Plan is positively prepared.</p> <p>This approach is consistent with guidance on this matter from the Town and Country Planning Association (TCPA), which states that, "As a general rule, 50% of the land total in a new Garden City should be green infrastructure, including private gardens and green roofs and this should be clearly stated in local planning policy". (Practical Guides for Creating Successful New Communities, Guide 7: Planning for Green and Prosperous Places, TCPA, January 2018, page 17)</p> <p>With respect to sub-criterion (i) CEG objects to the reference to "retail provision to form the vibrant village</p>		

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		<p>core" as this is not consistent with the NPPF which states that the range of uses permitted should be defined as part of a positive strategy for the future of each centre (NPPF, paragraph 85. (b))....</p> <p>A. In line with Policy SP02, land at Dunton Hills (east of the A128, south of the A127 and north of the C2C railway line, approximately 259.2 ha in size) is allocated for residential-led development to deliver Dunton Hills Garden Village.</p> <p>B. The development will deliver a mix of uses to comprise at least 2,700 homes in the plan period (as part of an overall indicative capacity of around 4,000 homes with the remainder to be delivered beyond 2033) together with the necessary community, employment, utility, transport and green and blue infrastructure (GBI) to support a self-sustaining, thriving and healthy garden village.</p> <p>C. Successful development of the site allocation will require:</p> <p>a. the masterplan to be underpinned by Garden Community principles and qualities</p> <p>b. proposals to creatively address the key site constraints and sensitively respond to the unique qualities and opportunities afforded by the historic landscape and environmental setting to deliver a distinctive and well-designed garden village in line with the Spatial Vision and Strategic Aims and Objectives for Dunton Hills Garden Village; and</p> <p>c. a holistic and comprehensive locally-led masterplan and design guidance to be developed, co-designed with relevant stakeholders to frame and guide the consistent quality and delivery across the site by different contractors over the delivery period.</p> <p>D. The proposed development will be required to deliver all the necessary supporting spatial components and infrastructure to address the specific site constraints, potential impacts of development and harness the site opportunities as set out by the strategic Dunton Hills aims and objectives. Permission for mixed-use development will be granted subject to the parameters and components specified below:</p>		

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		<p>a. delivery of at least 2,700 dwellings in the plan period providing a balanced variety of housing typologies and tenure and includes provision of self-build plots in line with Policy HP01; specialist accommodation in line with Policy HP04; and affordable housing in line with Policy HP05;</p> <p>b. the provision of a minimum of 5 serviced Gypsy and Traveler pitches, in line with Policy HP07(b);</p> <p>c. land (circa 5.5 ha) for employment space (in line with Policy PC03) to accommodate a creative range of creative employment uses suitable for a vibrant village centre and a predominantly residential area, including use class A1-A5 and appropriate B class uses;</p> <p>d. land (circa 7.9 hectares) for a co-located secondary school (Use Class D1);</p> <p>e. land (circa 2.1 hectares each) for two co-located primary school and early years and childcare nurseries, preferably co-located (Use Class D1);</p> <p>f. land (circa 0.13 hectares each) for two stand-alone further early years and childcare nurseries (Use Class D1);</p> <p>g. community and health infrastructure proportional to the scale of development, and in line with best practice principles of healthy design;</p> <p>h. green and blue infrastructure to be a minimum of circa 50% of the total land area including private gardens and green roofs;</p> <p>i. retail the provision of main town centre uses to form the vibrant village core in the form of a 'District Shopping Centre' with additional Local Centre(s) in line with Policy PC08, as appropriate to the scale and phasing of the development;</p> <p>j. the provision of new and enhanced transport infrastructure to mitigate the impacts of development and to support sustainable modes of travel to ensure connectivity to key destinations, increase transport</p>		

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		<p>choice, support changes in travel behaviour, and to minimise the impact of traffic on the local and wider network, in line with Policy BE16 and as detailed in R01(ii) G-J; and</p> <p>k. strategically designed and appropriately phased infrastructure, employing the most up to date technologies to ensure a smart, sustainable and a resilient ...</p>		
22187 - Dr Philip Gibbs [4309] 23301 - West Horndon Parish Council (Mr Kim Harding) [381]	Object	<p>Dunton Hills Garden Village poses a flood risk to West Horndon, Bulphan and areas in Thurrock around the Mardyke Valley. This has not been adequately addressed in cooperation with Thurrock council. See attachment for full details.</p> <p>Appendix K of the Surface Water Management Plan (SWMP) notes that "a large portion of... (Dunton Garden Suburb) is identified by the SWMP as having limited potential to deliver 'infiltration' measures as part of sustainable drainage strategy." Whilst the requirement of Policy RO1.D.k on DHGV for "strategically designed and appropriately phased infrastructure, employing the most up to date technologies to ensure a smart, sustainable and a resilient basis for drainage and flood management" is welcomed, such measures have not been scoped out in more depth to ascertain whether they do not undermine the viability of the overall development.</p> <p><i>Reassess flood impact in locality, remove about 1000 homes from the development to allow for a suitable wash area or attenuation pond for flood management.</i></p>	<p>2,770 homes are required to meet the housing need for the borough. DHGV has been chosen as a strategic location for the majority of Brentwood Borough Council's housing Growth. The justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper. As part of the preparation of the Masterplan Framework and any planning application that comes forward on the DHGV site, flooding mitigation measures are required.</p>	No change

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24082 - LaSalle Land Limited Partnership [8362]	Object	<p>Policy R01 (1) should be amended to reduce the overall amount of housing to be delivered at DHGV in the plan period. This needs to be more realistic with commencements of completions no earlier than 2025/2026, with a total delivery of 1950 in this period. The SA and Appendix 1 should be amended accordingly.</p> <p><i>Policy R01 (1) should be amended to reduce the overall amount of housing to be delivered at DHGV in the plan period. This needs to be more realistic with commencements of completions no earlier than 2025/2026, with a total delivery of 1950 in this period. The Housing Trajectory at Appendix 1 also therefore requires modification for DHGV to remove the completion of dwellings in the period 2022/23 - 2025/26 which are considered to be unrealistic given the time necessary to resolve planning, land control</i></p>	<p>DHGV has been chosen as a strategic location for some of Brentwood Borough Council's housing Growth. The strategy focusses growth in sustainable locations principally along two growth corridors (Central Brentwood and Southern Brentwood). This includes the identification of Dunton Hills Garden Village as a new settlement which will meet the needs of Brentwood Borough. The Council is of the view that meeting growth needs by delivering a garden village is consistent with local character and provides significant infrastructure investment to accommodate the scale of development. Refer to Local Plan Pre-Submission (Reg 19) Chapter 3 Spatial Strategy Vision and Strategic Objectives. Further justification for its strategic location within the Greenbelt is set out in the DHGV Topic Paper. It is noted that there will be 2,770 homes located on the site allocation as a result of response to Regulation 19 consultation. This will ensure the housing need it met over the lifetime of the plan period. The strategy as proposed includes justification for the site allocations, alternative/additional sites have been considered but have not been selected. The Council is of the view that DHGV can be delivered within the required timeframes as set out within the published trajectory. As part of the masterplan work, further information will be forthcoming on delivery of DHGV. There is a requirement in the NPPF to have a flexible supply of locations for new development to meet housing need (NPPF paragraph 68). This includes sufficient homes for the initial five years supply as well as sites of various sizes so they can brought forward for development. The Council does not want to rely too heavily on one site to meet the borough's development needs.</p>	No change

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		<p>and funding matters fully. The overall quantum should be reduced accordingly rather than further backloaded in the DHGV trajectory.</p> <p>Other reasonable alternative sites (as identified in the Sustainability Appraisal), including LLLP's land interest at Honeyplot Lane, Brentwood should be included within the Local Plan allocations to assist in meeting the housing requirements and acute shortage in the early part of the Plan period given the changes needed in total delivery and phasing trajectory for DHGV. Additional technical evidence, testing and evaluation of the DHGV proposals in terms of transport, community and green infrastructure requirements costs and funding, is required to support the Local Plan's proposed allocation of the site and to ensure that this is proposed on a comprehensive and realistic basis. Policy R01 (I) should be modified accordingly.</p>		
23130 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>The DHGV is within close proximity with Basildon &amp; Thurrock Boroughs and it is considered that there may be implications for the future geographical extent of both the Brentwood and South Essex Housing Market Areas as the housing markets evolve. The attached table has been prepared using Figure 6.1 from the Plan and the South Essex Strategic Housing Market Assessment that has informed the Basildon Borough Local Plan 2014-2034 and it is considered both these SHMA's should instead be used to inform the housing mix policy for DHGV.</p> <p><i>It is considered the stark contrast between the house size requirements for Basildon and Brentwood in DHGV, which is on a boundary location, means it needs to have taken into account the South Essex SHMA in determining the housing mix for DHGV so that it can better sit within the landscape of the strategic context of South Essex, which is not reflective of the wider Brentwood Borough HMA. Policy HP01 and R01 should be amended in light of this.</i></p>	<p>The spatial strategy as proposed includes justification for the site allocations, alternative/additional sites have been considered but have not been selected. The Council is of the view that DHGV can be delivered within the required timeframes as set out within the published trajectory. As part of the masterplan work, further information will be forthcoming on delivery of DHGV. There is a requirement in the NPPF to have a flexible supply of locations for new development to meet housing need (NPPF paragraph 68). This includes sufficient homes for the initial five years supply as well as sites of various sizes so they can be brought forward for development. The Council does not want to rely too heavily on one site to meet the borough's development needs.</p>	No change

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23168 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>The Plan and the Transport Assessment fails to investigate the possible impacts on Basildon's road and rail infrastructure arising from commuters or other road users choosing to access facilities within the Basildon Borough instead. The need for new connections into Basildon was not mentioned as being necessary to make it sustainable. No evidence was present to demonstrate that DHGV's growth demands have been evaluated in combination with the projected demands from Basildon Local Plan. The Plan should not assume that such growth can just be absorbed by the nearby infrastructure and services in Basildon and investment through developer contributions.</p> <p><i>The Plan should be modified to recognise that some impacts are likely to be cross boundary and additional provisions should be incorporated into SP04 and RO1(I) that will support using S106/CIL arising from development in Brentwood Borough to be used for investment outside the Brentwood Borough, where it can be proven that there is reasonable likelihood of a direct or residual impacts otherwise being caused that need to be mitigated. This will make the Plan more effective, justified and in accordance with national policy.</i></p>	xxx	yyy
23139 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>Policy R01(D)(h) set a target to retain 50% of the strategic allocation for green and blue infrastructure. However, Basildon Council questions whether this is intended to be a permanent resource, given it also determines that a further 2,300 homes could be brought forward in the strategic location after 2033; taking its indicative total to around 4,000 homes. It is considered that if it is not explained clearly in any published evidence, as to whether any of the retained space for green and blue infrastructure would need to be used to meet this higher development scale after 2033.</p> <p><i>Clarify within R01 and its supporting text whether the Green Infrastructure proposed to amount to 50% of the land area is a permanent resource or whether the projected growth in the area beyond the plan-period would need to utilise any of the green infrastructure for growth. If the latter, the percentage should be adjusted accordingly.</i></p>	Consider minor amendments to clarify that the 50% is to be a permanent resource. Policy RO1 (I) also sets out the need to adhere to a masterplan and SPD which includes 50% allocation of Green and Blue Infrastructure for the entire site allocation and therefore total of up to 4,000 dwellings (site capacity).	Consider minor amendment for clarity of 50% Green and Blue infrastructure in Policy R01



## POLICY R01 (I): DUNTON HILLS GARDEN VILLAGE STRATEGIC ALLOCATION

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22384 - Sport England (Mr. Roy Warren) [4294]	Object	<p>The policy is objected to because it has not addressed the need to either demonstrate that Dunton Hills Golf Centre is surplus to requirements through a golf course needs assessment or make provision for retaining/replacing the golf centre if the needs assessment shows that all or parts of the golf centre should be protected for meeting community golf facility needs.</p> <p><i>To address this objection, the policy should be amended to add an additional policy criterion requiring the loss of Dunton Hills Golf Centre to be addressed through demonstrating that the facility is surplus to requirements or provision being made for its retention or replacement with equivalent/better facilities as part of the development.</i></p>	It is noted that as part of Duty to Cooperate and ahead of any planning application, ongoing discussions are underway with Sports England and Golf England to resolve issues and undertake further needs analysis. It is noted that the policy suffices to that extent to ensure issues are resolved prior to determination. The golf needs assessment outlines how needs are being met elsewhere to suffice loss of golf facilities.	No change
23985 - Bellway Homes and Crest Nicholson [8351]	Support	<p>There is a slight inconsistency between policy clauses A and D in the use of "around 2,700 homes" and "at least 2,700 homes" in the plan period. Our clients would favour the more positive "at least" in light of the pressing housing needs in the area.</p> <p><i>Favour the more positive use of "at least" instead of "around 2,700 homes" in the plan period in light of the pressing housing needs in the area.</i></p>	Consider clarification in light of further consultation within proposed Addendum document. The Council is of the view that DHGV can be delivered within the required timeframes as set out within the published trajectory. As part of the masterplan work, further information will be forthcoming on delivery of DHGV. There is a requirement in the NPPF to have a flexible supply of locations for new development to meet housing need (NPPF paragraph 68). This includes sufficient homes for the initial five years supply as well as sites of various sizes so they can brought forward for development. The Council does not want to rely too heavily on one site to meet the borough's development needs.	Clarification change considered
22245 - Mr and Mrs Paul McEwen [4610]	Support	<p>Will supply a new village environment with many new houses to fulfil residents needs. The location is ideal for current plan with room for growth.</p> <p><i>No change proposed</i></p>	Support welcomed	No further action

## POLICY R01 (I): DUNTON HILLS GARDEN VILLAGE STRATEGIC ALLOCATION

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23983 - Bellway Homes and Crest Nicholson [8351]	Support	<p>Policy HP18: Designing Landscape and the Public Realm, in combination with Policy R01(I) clause C, provide an adequate policy framework for guiding a future landscape scheme - including the provision of green infrastructure between R01 and the development of the West of Basildon.</p> <p><i>No specific change proposed</i></p>	Noted	No change
23305 - Natural England (Ms Louise Oliver) [8299]	Support	<p>Policy incorporates measures to avoid significant adverse impacts on designated sites including those identified under Essex RAMS, arising from this new development (subject to a well-designed masterplan being produced which includes all relevant and necessary measures).</p> <p><i>Reference made to well designed masterplan being required to reflect policy,</i></p>	Comment welcomed	Reflect within well-designed masterplan.
23984 - Bellway Homes and Crest Nicholson [8351]	Support	<p>Clause B uses the term "self-sustaining" - this is currently an undefined term in the context of the facilities that may be required by future residents. It is likely that services and schooling would also be accessed in Basildon and so the policy should also recognise the importance with connectivity to nearby allocations and settlements in Basildon Borough. Whilst appreciating the need for a garden village to be separate, it should also be appropriately connected and complimentary to nearby settlements.</p> <p><i>Need to recognise the importance with connectivity to nearby allocations and settlements in Basildon Borough. Whilst appreciating the need for a garden village to be separate, it should also be appropriately connected and complimentary to nearby settlements.</i></p>	As part of the preparation of the Masterplan Framework and any planning application that comes forward on the DHGV site, importance and connectivity with the area are further detailed.	No change
23251 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>As a result of development on site R01 and R02, development of a new health facility will be required to be phased to align with housing delivery trajectory. Collaboration agreement, secure Wi-Fi and clinical system installation and maintenance required as part of mitigation within Care Homes.</p> <p><i>No change, collaborative agreement considered positive</i></p>	Support welcomed	Continue with collaborative agreement work.

## POLICY R01 (I): DUNTON HILLS GARDEN VILLAGE STRATEGIC ALLOCATION

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23278 - c2c Rail (Chris Atkinson) [8280] 23279 - c2c Rail (Chris Atkinson) [8280]	Support	<p>The importance placed on providing effective public transport links from the Dunton Hills Garden Village to West Horndon station in the draft Plan is welcomed. We are aware that Thurrock Council is considering significant development to the south of the railway line. There is currently no access to the station from the south, so such development there would also mean significant investment is required. We recommend a joint approach between c2c, Brentwood, Thurrock and the relevant developers would be the most effective way forward to ensure a suitable station is constructed that delivers value for money for all parties. We are committed to playing a full role in this process in the future.</p> <p><i>No change proposed, ongoing work on transport proposed</i></p>	Noted. A joint approach is currently being undertaken as part of Duty to Cooperate. and welcome the comment made	Continue with joint approach.
23986 - Bellway Homes and Crest Nicholson [8351]	Support	<p>Clause D(c) currently expresses a requirement for employment land as 5.5ha. An alternative approach would be to also reference a jobs figure, employment densities are not fixed and the policy will need to remain flexible.</p> <p>Clause D(d) references a co-located Secondary school, but this term is not defined in terms of what facilities could be appropriately co-located or any indication on forms of entry etc.</p> <p>Clause D(h) states 50% of the "total land area", this term is not defined and may have implications for the net developable area. This appears needlessly onerous. Suggest removal of a specific percentage .</p> <p><i>Clause D(h) states 50% of the "total land area", this term is not defined and may have implications for the net developable area. This appears needlessly onerous. Suggest removal of a specific percentage .</i></p>	It is noted that a land requirement is considered acceptable to achieve the outcomes of DHGV. It is noted that further detailed design as set out in the masterplan will clarify suggestions in the submission. Masterplan and Supplementary Planning Document as part identified in RO1 (I) - C.	No change
22366 - Rochford District Council (Planning Policy) [4178]	Support	<p>The Council does not object to the principle of allocating land at Dunton Hills for a new garden village.</p> <p><i>No proposed change</i></p>	Support in principle welcomed	No further action

## POLICY R01 (I): DUNTON HILLS GARDEN VILLAGE STRATEGIC ALLOCATION

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23825 - Sow & Grow Nursery (Mr. Derek Armiger) [303] 23835 - Sow & Grow Nursery (Ms Kim Armiger) [4657] 23853 - Ms Maxine Armiger [4656]	Support	Policy R01, Dunton Hills Garden Village is not in principle objected to provided that no further development in dwelling numbers are allocated to this very large site. At 2,700 dwellings these are a substantial number and part of meeting local housing need and these will take time to build and supply. It is all the more important that smaller, readily developable sites, such as that at Sow N Grow Nursery and land at 346 Ongar Road can be brought forward quickly and readily and without undue constraints to accord with para. 68 of the NPPF  <i>No change proposed</i>	Support noted	No further action
23283 - Wood (on behalf of National Grid) (Ms Lucy Bartley) [8094]	Support	Site is crossed or in close proximity to National Grid gas transmission asset FM05. Please see enclosed plan referenced GT111. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.  <i>No change proposed - awareness of strategic infrastructure across the site mentioned,</i>	Welcome information on Gas transmission location.	Consider accordingly
22324 - Anglian Water (Mr Stewart Patience) [6824] 23206 - Anglian Water (Mr Stewart Patience) [6824]	Support	Policy R01: we welcomes the cross reference made to Policies BE02 Sustainable Construction and Resource Efficiency and BE08 Sustainable Drainage subject to our comments relating to these policies. We are supportive of the Local Plan policies relating to Dunton Hills strategic allocation (RO1 (I) and RO1 (III)).  <i>No change proposed</i>	Support for policies R01m BE02 and BE08	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY R01 (II): SPATIAL DESIGN OF DUNTON HILLS GARDEN VILLAGE</i></b>				
23166 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>Although the Plan includes specific references that the joint borough boundary needs a degree of landscape and Green Belt treatment to maintain a visual separation, it does not elaborate as to how this will be achieved. It is disappointing that the joint study in 2017, Dunton Area Landscape Corridor Design Options Study, does not form part of the referenced and published evidence base for the Plan, nor do the outcomes from this work appear to have informed Policy R01(II) as sought through the earlier Duty to Cooperate engagement. The Council therefore objects to Policy R01(II) and Paragraph 9.36.</p> <p><i>The measures set out in the Joint Dunton Area Landscape Corridor Design Options 2017 should be acknowledged in Paragraph 9.36 and incorporated into Policy 9.36 to make it more justified and effective at mitigating the impact the development would otherwise have on the Basildon Borough. This would lead to an effective policy outcome identified as being necessary during Duty to Cooperate engagement to manage this cross-boundary issue. It is considered that as a matter of principle, this would help address the Council's previous Regulation 18 objections as to how the boundary would be treated and how the new community could exist side by side the existing smaller settlement of Dunton Wayletts in the Basildon Borough.</i></p>	<p>Disagree. The 2017 landscape corridor work is not fit for purpose. The document was drafted without accepting the proposed quantum of development for DHGV. This was made clear at the outset of commissioning the report and throughout the process of drafting but despite this the authors repeated ignored this fundamental requirement ie that the report was to assess options for a landscape corridor with the proposed quantum of development within both boroughs. Whilst the report has some interesting ideas, the fundamental scale of proposals are inappropriate. The Council are happy to continue the process of duty to cooperate with neighbouring boroughs, in particular to continue the development of the Dunton Masterplan Framework.</p>	No further action

## POLICY R01 (II): SPATIAL DESIGN OF DUNTON HILLS GARDEN VILLAGE

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23172 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>Basildon Council would like to seek assurances written into Policy R01(II) that it will be invited by Brentwood Council to become more involved in the detailed design and delivery of the new village. This will ensure that the strategic and cross-boundary impacts covered by the Duty to Cooperate and raised during the Council's response to the Plan at Regulation 18 and 19 stages are managed effectively during the development's implementation stages (assuming it is considered sound), alongside the Basildon Borough Local Plan's own implementation.</p> <p><i>The Council would like a criterion added into Policy R01(II) under a new heading "Collaborative Approach" that will make it a requirement for neighbouring authorities to be engaged during the detailed design stages of DHGV to ensure strategic and cross boundary impacts are managed effectively during implementation.</i></p>	As part of Duty to Cooperate, Brentwood Borough Council have been liaising with adjoining authorities as key stakeholders to assure a collaborative approach. As detailed design phases occur, all neighbouring authorities are provided the opportunity to be involved. As such, no change is recommended.	The Council are happy to continue the process of duty to cooperate with neighbouring boroughs, in particular to continue the development of the Dunton Masterplan Framework.
24084 - LaSalle Land Limited Partnership [8362]	Object	<p>Policy R01 (II): Spatial Design of Dunton Hills Garden Village. Policy seems aspirational rather than based on clear testing and evidence or needs and impacts. Requirements such as a green buffer/wedge purpose is unclear, no landscape or visual impact assessment is considered. Transport Mitigation is not detailed, Viability assessment has a zero cost for 3,500 rather than the proposed 2,700 in the plan. A new viability analysis is needed.</p> <p><i>There needs to be prepared an updated, comprehensive viability analysis of the DHGV proposals including all costs, site specific infrastructure requirements, CIL and modelling of the effects of all of the proposed design and land use requirements set out in the Local Plan, including those stated in Policy R01 (I) and R01 (II), policy needs redrafting in light of evidence.</i></p>	<p>Viability work is undertaken as part of the planning application.</p> <p>Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy R01 (i), detailed planning requirements as identified in the submission will be resolved. As part of Duty to Cooperate, Brentwood Borough Council are working with transport authorities to address any transport impacts. It is noted that the DHGV proposal is intended to provide a sustainable transport development that will minimise impact to surrounding areas. The local plan correlates to the IDP which has been updated and will be publicly available for local plan submission.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23182 - London Borough of Havering (Mr Martyn Thomas) [7966]	Object	<p>There is no recognition in the proposal about the likely adverse environmental impacts of significant additional traffic along the A127 (including within Havering) resulting from the proposal such as noise, vibration and reductions in air quality.</p> <p>Changes to Plan: Section H refers to mitigations necessary to support the DHGV proposal but these do not adequately address the strategic implications on the wider highway network. The focus of the measures is about 'fitting' the proposal into the network with local measures rather than ensuring that the considerable traffic it may generate could be accommodated on the wider highway network as well as all the other growth planned for east London and south Essex. It is welcome that these issues are noted in the explanatory text to Policy BE11 (paragraph 5.97-5.102) but they should be referenced in the DHGV proposal.</p> <p><i>Policy R01 : Dunton Hills Garden Village Strategic Allocation should be amended :</i></p> <ul style="list-style-type: none"> <li><i>* to provide explicit commentary on the likely significant implications of the proposal for the wider strategic highway network</i></li> <li><i>* to recognize the importance of working with other stakeholders (such as Transport for London and London Borough of Havering) so that there can be certainty that the impacts of the DHGV proposal are satisfactory and can be accommodated without any adverse impact on the network beyond Brentwood</i></li> <li><i>* to recognize the role of the established joint working between authorities along the A127 corridor to ensure that the significant growth along the corridor is understood, assessed and mitigated as necessary.</i></li> <li><i>* to recognize the merit of the preparation of a Statement of Common Ground or Memorandum of Understanding between relevant stakeholders to recognize the issues involved and set out a joint commitment to recognizing these and addressing them</i></li> <li><i>* to recognize that the scale of the proposal and the traffic it will generate is likely to have significant adverse environmental impacts for the wider area (including Havering) and that these need to be considered and mitigated</i></li> <li><i>* to include cross reference to Policy BE11 Strategic</i></li> </ul>	<p>Detailed changes of this nature are required as part of the preparation of the Masterplan Framework and Supplementary Planning Document. Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy R01 (i), detailed planning requirements as identified in the submission will be resolved. As part of Duty to Cooperate, Brentwood Borough Council are working with transport authorities to address any transport impacts. It is noted that the DHGV proposal is indented to provide a sustainable transport development that will minimise any impact to surrounding areas. The Council are in ongoing discussions to prepare a Statement of Common Ground with Havering Council ahead of Examination in Public.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		Transport Infrastructure (where the Local Plan addresses some issues relating to the wider highways network albeit without referring to DHGV)		



## POLICY R01 (II): SPATIAL DESIGN OF DUNTON HILLS GARDEN VILLAGE

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23181 - London Borough of Havering (Mr Martyn Thomas) [7966]	Object	<p>Section H refers to mitigations necessary to support the DHGV proposal but these do not adequately address the strategic implications on the wider highway network. The focus of the measures is about 'fitting' the proposal into the network with local measures rather than ensuring that the considerable traffic it may generate could be accommodated on the wider highway network as well as all the other growth planned for east London and south Essex. It is welcome that these issues are noted in the explanatory text to Policy BE11 (paragraph 5.97-5.102) but they should be referenced in the DHGV proposal.</p> <p><i>Policy R01 : Dunton Hills Garden Village Strategic Allocation should be amended :</i></p> <ul style="list-style-type: none"> <li><i>* to provide explicit commentary on the likely significant implications of the proposal for the wider strategic highway network</i></li> <li><i>* to recognize the importance of working with other stakeholders (such as Transport for London and London Borough of Havering so that there can be certainty that the impacts of the DHGV proposal are satisfactory and can be accommodated without any adverse impact on the network beyond Brentwood</i></li> <li><i>* to recognize the role of the established joint working between authorities along the A127 corridor to ensure that the significant growth along the corridor is understood, assessed and mitigated as necessary.</i></li> <li><i>* to recognize the merit of the preparation of a Statement of Common Ground or Memorandum of Understanding between relevant stakeholders to recognize the issues involved and set out a joint commitment to recognizing these and addressing them</i></li> <li><i>* to recognize that the scale of the proposal and the traffic it will generate is likely to have significant adverse environmental impacts for the wider area (including Havering) and that these need to be considered and mitigated</i></li> <li><i>* to include cross reference to Policy BE11 Strategic Transport Infrastructure (where the Local Plan addresses some issues relating to the wider highways network albeit without referring to DHGV)</i></li> </ul>	<p>Detailed changes of this nature are required as part of the preparation of the Masterplan Framework and Supplementary Planning Document. Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved. As part of Duty to Cooperate, Brentwood Borough Council are working with transport authorities to address any transport impacts. It is noted that the DHGV proposal is indented to provide a sustainable transport development that will minimise any impact to surrounding areas.</p> <p>BBC are in ongoing discussions to prepare a Statement of Common Ground with Havering Council ahead of Examination in Public.</p>	No change

## POLICY R01 (II): SPATIAL DESIGN OF DUNTON HILLS GARDEN VILLAGE

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22320 - Essex Bridleways Association (Mrs Sue Dobson) [3855]	Object	<p>The five points made refer to issues that do not consider access for all user groups and should be amended.</p> <p><i>1.To make this Plan sound, we suggest that any such green open space and buffer created within this development is made fully accessible for all user groups including equestrians.</i></p> <p><i>2.To make this Plan sound, we suggest that the words 'fully accessible for all user groups as far as practicable' are included within this Policy.</i></p> <p><i>3. To make this Plan sound, we suggest that point 7 incorporates 'multi-user routes' rather than cycle lanes throughout this development so as not to discriminate against equestrians. After all, this development should cater for both leisure and utility/commuting journeys.</i></p> <p><i>4. To make this Plan sound, a dedicated multi-user crossing be created over the A127 and potentially Pegasus crossings on the two busy roads east and west of the site.</i></p> <p><i>5. To make this Plan sound, we suggest that the Street Hierarchy caters for ALL users by default rather than enhancing routes which connect back to pedestrian routes; the aim should be a fully-connected multi-user network throughout the new development. Point c should therefore be reworded thus:</i></p> <p><i>'...enhancement and upgrading of public footpaths and other public rights of way (such as Nightingale Lane, an existing definitive Byway) and any bridleways throughout the GBI network, to coherently connect back to both residential pedestrian links and multi-user links; and...'</i></p>	<p>Noted. The changes are considered minor in nature and through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy R01 (I), detailed planning requirements as identified in the submission will be considered and resolved.</p>	No change
22440 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Policy R01 (II) J. b. makes reference to the A127 as an access to the site. The remainder of the DHGV policies do not define access to the site, which is inconsistent with all other site allocation policies. Appendix 2 does refer to access from A128 Tilbury Road. ECC do not support access to the site from the A127, and reference to the A127 should be deleted from this policy.</p> <p><i>Delete reference to 'A127' in Policy R01 (II) J. a.</i></p>	<p>Noted. agree that clarification of access to the site is necessary in line with on-going discussions with the Highways Authority - Essex County Council.</p>	Clarification of site access locations

## POLICY R01 (II): SPATIAL DESIGN OF DUNTON HILLS GARDEN VILLAGE

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22402 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Object	<p>The development should provide:</p> <ul style="list-style-type: none"> <li>* Real, measurable gains for wildlife and biodiversity</li> <li>* Effective water management, pollution and climate control</li> <li>* Connectivity between wild spaces</li> <li>* Improved health, wellbeing and quality of life</li> <li>* Easy access to high quality, wildlife-rich, natural green space</li> </ul> <p><i>Ecological Networks, Biodiversity Net Gain, Green Infrastructure and Public Realm</i></p> <p>C.</p> <p><i>a. a highly connected and biodiverse ecological network that incorporates existing habitats of value and natural features, "delivers a net measurable gain in biodiversity", and where relevant new habitats such as trees, tree lines and hedges, hedgerows, ponds and lakes...</i></p>	Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (I), detailed planning requirements as identified in the submission are considered and resolved.	No change
23199 - Highways England (Heather Archer) [8309]	Object	<p>Highways England has concerns in regards to the Local Plan developments impacts on the Strategic Road Network. Although policies BE11 and BE16 identify the need that "any significant impacts from the development on the highway network on highway safety must be effectively mitigated to an acceptable degree". The transport impacts of Dunton Hills and the Brentwood Enterprise Park site policies imply that they will be assessed in isolation. This assessment should be done as part of the wider Local Plan picture.</p> <p><i>For clarity, we suggest that the wording is amended to reflect that there is a need to mitigate the impacts of the full Local Plan rather than the developments within it individually. Any single development may have no discernible impact whereas cumulatively the Local Plan impacts may require mitigation. Accordingly we are looking for evidence on the cumulative impacts of the Local Plan. Similarly, you may wish to amend the wording of policies relating to individual allocations, particularly the strategic allocations for Dunton Hills in Policy R01 (ii) under Transport Impact Mitigations and Brentwood Enterprise Park in Policy E11. These two policies suggest that impacts for these two developments will be assessed in isolation rather than as part of a bigger Local Plan picture.</i></p>	Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved. As part of Duty to Cooperate, Brentwood Borough Council are working with transport authorities to address any transport impacts. It is noted that the DHGV proposal is intended to provide a sustainable transport development that will minimise any impact to surrounding areas	No change

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23987 - Bellway Homes and Crest Nicholson [8351]	Object	<p>Policy clause C(f) states: "a green infrastructure [...] zone." This matter needs careful consideration in advance of submission in light of Basildon's representations and their erroneous position on Green Belt coalescence and countryside encroachment in their draft plan (which fails to allocate sufficient land to meet needs). Brentwood should provide further clarity that this separation can be achieved without sterilising large tracts of the allocation.</p> <p>Policy clause D(c) states "pathways through [...] points". It is premature at this stage to place overly restrictive pathway design where they may be sound place-making reasons for not following this approach in all areas.</p> <p>Policy clause I(a) states that emphasis will be given to: "incorporating car sharing clubs and electric vehicle only development". Whilst the principle is supported, this may not be appropriate for all areas of this large allocation and would be overly restrictive.</p> <p>Policy clause L(b) includes a small typo for BREEAM. This clause should make clear that BREEAM is for certain types of building only.</p> <p><i>A modest multifunctional green gap running north-south in close proximity to the Borough boundary would be a proportionate response in this location.</i></p>	<p>A defensible GB boundary would likely need to comprise of more than a modest green gap and any multi-functional use would also be commensurate with the purpose of a strong boundary. Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 D (h), detailed planning requirements as identified in the submission are considered and resolved.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23990 - CEG Land Promotions Limited [5050]	Object	<p>Suggested wording changes are proposed for reasons of clarity to ensure consistency with other parts of the policy.</p> <p>Criterion C</p> <p>As was stated above CEG generally supports the policy relating to the spatial design for GBI outlined in criterion C. However, CEG objects to sub-criterion (f) as it is inconsistent with national policy. The Strategic Allocation involves the release of the land from the Green Belt so the GBI on the eastern boundary that forms part of allocation cannot reinforce the beneficial purpose and use of the Green Belt in that zone, as policy requires. Amendments are proposed which rewords the policy so that it can assist in achieving objectives of visual separation of settlements and improving landscape and habitat value, whilst forming a robust and clearly defined boundary using physical features that are likely to be permanent. This is in accordance with paragraph 139(f) of the NPPF.</p> <p>Criterion E</p> <p>CEG supports the approach of safeguarding and maintaining key views within the development. In relation to criterion E(a) a small change is proposed to reflect that it is visual corridors that are important rather than landscape corridors. This acknowledges that not all visual corridors need to be landscape driven. In relation to criterion E(b) a minor change is suggested to make it clear that the visual separation is between DHGV and Basildon. Lastly, in relation to criterion E(c), it is proposed to remove this criterion as this does not relate to 'views' and is in any event already addressed elsewhere in the plan by virtue of Policy BE02(a).</p> <p>Criterion F</p> <p>With respect to criterion F, CEG objects to the wording of the policy as it is inconsistent with national policy and modifications are proposed to bring it in line with the NPPF.</p>	<p>A defensible GB boundary would likely need to comprise of more than a modest green gap and any multi-functional use would also be commensurate with the purpose of a strong boundary. Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 D (h), detailed planning requirements as identified in the submission are considered and resolved.</p> <p>Embedding Heritage assets: Apart from making consistent with NPPF / Act; there is a need to draw out the opportunity and desire to mobilise Heritage assets for the purpose of successful place making. Therefore changes are not recommended.</p> <p>Sustainable Transport: Changes are agreed with the exception of inclusion of 'single occupancy car'. Car usage is discouraged.</p> <p>Transport Impact Mitigations:</p> <p>The purpose of this policy is to ensure the key vision is met and combines design concepts and other measures to ensure that impact on the highway and transportation network is first brought down to minimum level and then improvements are implemented to mitigate any residual adverse impacts (and enhance existing provision). As such the proposed change is not recommended.</p> <p>Clean Vehicle Alternatives</p> <p>No change recommended. Considered minor in nature.</p> <p>Village Centre(s)</p> <p>No change recommended. Considered minor in nature. Reference to incorporation of the main village centre in the historic farmstead capitalises on placemaking opportunities and is therefore not recommended for change.</p>	No change proposed by the Council

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>Paragraph 185 of the NPPF, requires that "Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account: a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;..."</p> <p>In relation to designated heritage assets, paragraphs 195 and 196 provide for harm to heritage assets to be weighed against the public benefits of a proposal. As such, there are circumstances where not all heritage assets will be "sustained and enhanced". A modification is proposed in our response to question no. 6 to ensure consistency with the NPPF.</p> <p>With respect to sub-criterion (b) CEG objects to the prescriptive nature of the requirement to integrate the listed farmstead as part of the Dunton Hills Village Centre, as it is considered that this isn't justified. The NPPF emphasises that the conservation of designated heritage assets is of great weight and that less than substantial harm should be weighed against the public benefits of the scheme; there are therefore a number of acceptable design solutions that respect the setting of the listed farmhouse. The reference to the historic core overstates the position as there is only a small collection of farm buildings. The policy should refer to the integration of the farmstead with new development at DHGV more generally, so that the solution flows out of the masterplan process and a consideration of the landscape and heritage assessments referred to in the policy. This would allow the farmstead to be integrated into the Village Centre but also allow an alternative to be pursued if a better option emerges.</p> <p>With respect to criterion F(c) detailed matters relating to any alterations of listing buildings to accommodate new uses would be considered via planning and listed building consent applications and this should be simplified to aid clarity.</p> <p>The proposed modifications to deal with the issu...</p> <p><i>Policy R01 (II) Spatial Design of Dunton Hills Garden Village</i></p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>A. The locally-led garden village will be developed collaboratively to achieve a high quality Dunton Hills Garden Village development. Consent for Development will be permitted Planning permission will be granted if the masterplan and supporting design guidance for the development demonstrates how the spatial vision, design principles as well as Policies HP12 - HP18 on securing high-quality of placemaking is achieved to guide a coherent development across the whole allocation site.</p> <p>Distinctive Character, Harmonic Design, Compact Density</p> <p>B. Proposals must demonstrate how they will meet and embed key qualities to ensure distinctive, harmonic and popular design is achieved, by ensuring:</p> <p>a. the unique character of Dunton Hills is informed by its distinct spatial, landscape and heritage qualities;</p> <p>b. the design of sub-neighbourhoods and streets, that may take on their own unique character, are harmoniously integrated to form an overall Dunton Hills Garden Village identity - through the coherent and complementary use of materials and design of the public realm in line with Policy HP18; and</p> <p>c. an appropriate range of densities are achieved across the site to ensure a compact and highly networked, walkable and fine-grained environment with a highly connected street-based layout. This should be demonstrated by an accompanying density plan.</p> <p>Ecological Networks, Biodiversity Net Gain, Green Infrastructure and Public Realm</p> <p>C. A green and blue infrastructure (GBI) plan should be submitted that demonstrates how the design of GBI will be an integral part of the masterplan layout to achieve multi-functional, coherent and connected GBI in line with Policy BE18. The GBI plan should be informed by a comprehensive wildlife and habitat survey and heritage and landscape character assessment. The GBI Plan should incorporate the following:</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>a. a highly connected and biodiverse ecological network that incorporates existing habitats of value and natural features, and where relevant new habitats such as trees, tree lines and hedges, hedgerows, ponds and lakes, among others, in line with Policy NE01, NE03 and NE04;</p> <p>b. a variety of activity nodes and treatments for recreation and leisure opportunities throughout the GBI, including public natural parkland, pockets of village greens, local nature reserve, allotment sites, sports pitches and fields;</p> <p>c. a streetscape that continues the green infrastructure through the residential areas and village centre with creative landscape schemes including tree-lined streets, grass verges and rain gardens;</p> <p>d. an appropriate amount, height and depth of green infrastructure screening adjacent to A127, A128, rail tracks to mitigate noise and air pollution;</p> <p>e. well-designed interfaces between the green open space and the built structures should ensure passive surveillance, with coherent and gradual transitions and clear boundaries and vistas; and</p> <p>f. a green infrastructure buffer/wedge on the eastern boundary with Basildon Borough to help achieve visual separation between the two settlements and to help significantly improve the landscaped and habitat value by reinforcing the existing woodland, trees and hedgerows with new planting. thus reinforcing the beneficial purpose and use of the green belt in that zone.</p> <p>Sport, Recreational, Leisure and Public Open Space</p> <p>D. The provision for leisure, recreation and sport opportunities must be an integral part of the GBI Plan; it should incorporate as a minimum the following provision:</p> <p>a. an appropriate amount of sports and recreation provision to provide a variety of pitch sizes and</p>		



## POLICY R01 (II): SPATIAL DESIGN OF DUNTON HILLS GARDEN VILLAGE

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p><i>facilities in line with Policy BE23;</i></p> <p><i>b. the GBI following Nightingale Lane should incorporate a heritage trail with signage and history information boards;</i></p> <p><i>c. pathways through the ...</i></p>		
23806 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738]	Support	Policy R01 (II) d- SUPPORT	Support welcomed	No further action
		<i>No changes proposed for this section</i>		
22385 - Sport England (Mr. Roy Warren) [4294]	Support	<p>The approach to the spatial design of the Dunton Hills Garden Village is supported especially in relation to:</p> <ul style="list-style-type: none"> <li>* Green Infrastructure - section C</li> <li>* Sport, Recreational, Leisure and Public Open Space - section C</li> <li>* Sustainable Travel - section G</li> <li>* Social Infrastructure - section L</li> </ul> <p>This approach would be considered to accord with Government policy in section 8 of the NPPF in relation to 'promoting healthy and safe communities. The reference in paragraph 9.52 of the reasoned justification to the principles of active design guiding the evolution of the village layout, street hierarchy and connectivity is particularly welcomed.</p> <p><i>No change to this section proposed</i></p>	Support welcomed	No further action

## POLICY R01 (III): SCHEME DELIVERY AND LEGACY MANAGEMENT

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY R01 (III): SCHEME DELIVERY AND LEGACY MANAGEMENT</i></b>				
23992 - Bellway Homes and Crest Nicholson [8351]	Support	<p>Clause B states: "The development and phased delivery [...] new garden village". Whilst supported and the timely delivery on infrastructure is essential in the creation of a sense of community, off-site infrastructure may be beyond the control of the primary land owners/promoter, and risks stalling development if a Grampian condition is envisaged. An explicit policy clause is urgently required to ensure for a no ransom position. The primary developer must build roads up to the boundary of Crest Nicholson and Bellway Homes landholding. Without this added clause the allocation would be ineffective based upon the tests of soundness.</p> <p><i>An explicit policy clause is urgently required to ensure for a no ransom position. The primary developer must build roads up to the boundary of Crest Nicholson and Bellway Homes landholding. Without this added clause the allocation would be ineffective based upon the tests of soundness.</i></p>	The requirement in policy is for a locally-led and holistic Masterplan to be developed. This commits respective landowners. The Masterplanning process is looking to incorporate appropriate mechanisms for delivery. No change to local plan.	No change
23991 - CEG Land Promotions Limited [5050]	Support	<p>CEG generally supports the third part of Policy R01. Several minor amendments are proposed which will give the policy greater clarity and ensure its consistent with other parts of the plan. The reference to a Jobs Brokerage Scheme should be defined in the Glossary or a scheme mentioned in more general terms the aim of which is to ensure jobs go to local people. This aim is supported by CEG.</p> <p><i>Definition of Jobs Brokerage Scheme should be placed into the glossary. Plus other clarifying minor amendments.</i></p>	Agree- factual clarification	Define Brokerage scheme in Glossary.
22326 - Anglian Water (Mr Stewart Patience) [6824] 23207 - Anglian Water (Mr Stewart Patience) [6824]	Support	<p>We note that Policy R01 (III) include reference to the preparation of a masterplan as part of a collaborative process working with the private sector including Anglian Water which is supported. We are supportive of the Local Plan policies relating to Dunton Hills strategic allocation (RO1 (I) and RO1 (III)).</p> <p><i>No change proposed.</i></p>	Support for collaborative working and policies R01 (I and III) welcomed.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
9.24 23993 - CEG Land Promotions Limited [5050]	Object	<p>Paragraphs 9.24 - 9.89 Please refer to CEG's representations above on DHGV Strategic Aims and Objectives, paragraphs 9.19 - 9.22.</p> <p>In relation to paragraph 9.40, some modifications are proposed to remove reference to the 'significance' of landscape features and key views, instead requiring them to be retained and enhanced. This recognises that not all landscape features or key views will have a heritage interest and the use of 'significance' in the NPPF specifically relates to heritage assets. We have suggested that paragraph 9.40 becomes two paragraphs as the last sentence does not relate to landscape features and key views.</p> <p>CEG's representations outlined above would have some knock-on implications on what is contained within these paragraphs, albeit quite limited. For example, CEG generally supports paragraphs 9.45 - 9.50 dealing with Embedding Heritage Assets into the new development. No reference is made in this section to the need for listed farmhouse being incorporated into the village or district centre. For the reasons stated above we consider this is a matter that should flow from the outcome of the masterplan process. However, in the section on Social Place, in paragraph 9.60 it does refer to the farmstead being incorporated into the village core and for the reasons set out above, we consider such a reference should be deleted.</p> <p><i>Clarify paragraph in relation to other paragraphs</i></p>	The proposed change is considered too prescriptive and is considered as part of the Masterplan Framework and Supplementary Planning Document	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.30</b>				
23995 - Bellway Homes and Crest Nicholson [8351]	Object	<p>Paragraph 9.30 includes a reference to 'Medium' density- but this is not defined. The allocation location is in close proximity to Basildon and West Horndon and the potential for sustainable modes of transport lends itself to higher densities in district and local centres.</p> <p><i>Amend densities to reflect Basildon and West Horndon densities.</i></p>	<p>It is not envisaged that any major transport interchange will be created at DHGV, but higher densities (than the average for the site) may be appropriate to ensure walkable neighbourhoods and creating a critical mass of residents, workers and visitors for sustainable footfall and demand for the town centres and its facilities. Consider reflecting this in the masterplanning process.</p>	No change to local plan.
<b>URBAN LAYOUT / PUBLIC REALM</b>				
22434 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified 3. Effective 4.Consistent with National Policy. Request additional paragraph after paragraph 9.40 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Insert the following paragraph after paragraph 9.40 -</i></p> <p><i>The proposed development area 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. It should however be ensured that any development within this area complies with flood risk mitigation measures outlined in the Essex SuDS guide.</i></p>	<p>As part of the preparation of the Masterplan Framework and any planning application that comes forward on the DHGV site, flooding mitigation measures are required. As such no change is recommended. Other policies within the local plan address flooding and SUDS.</p> <p>No change to local plan</p>	No change to local plan

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*Representations**Nature**Summary of Main Issue/Change to Plan**Council's Assessment**Action*

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9.36

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23169 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>Although the Plan includes specific references that the joint borough boundary needs a degree of landscape and Green Belt treatment to maintain a visual separation, it does not elaborate as to how this will be achieved. It is disappointing that the joint study in 2017, Dunton Area Landscape Corridor Design Options Study, does not form part of the referenced and published evidence base for the Plan, nor do the outcomes from this work appear to have informed Policy R01(II) as sought through the earlier Duty to Cooperate engagement. The Council therefore objects to Policy R01(II) and Paragraph 9.36.</p> <p>Changes to Plan: The measures set out in the Joint Dunton Area Landscape Corridor Design Options 2017 should be acknowledged in Paragraph 9.36 and incorporated into Policy 9.36 to make it more justified and effective at mitigating the impact the development would otherwise have on the Basildon Borough. This would lead to an effective policy outcome identified as being necessary during Duty to Cooperate engagement to manage this cross-boundary issue. It is considered that as a matter of principle, this would help address the Council's previous Regulation 18 objections as to how the boundary would be treated and how the new community could exist side by side the existing smaller settlement of Dunton Wayletts in the Basildon Borough.</p> <p><i>The measures set out in the Joint Dunton Area Landscape Corridor Design Options 2017 should be acknowledged in Paragraph 9.36 and incorporated into Policy 9.36 to make it more justified and effective at mitigating the impact the development would otherwise have on the Basildon Borough. This would lead to an effective policy outcome identified as being necessary during Duty to Cooperate engagement to manage this cross-boundary issue. It is considered that as a matter of principle, this would help address the Council's previous Regulation 18 objections as to how the boundary would be treated and how the new community could exist side by side the existing smaller settlement of Dunton Wayletts in the Basildon Borough.</i></p>	<p>Disagree. The 2017 landscape corridor work is not fit for purpose. The document was drafted without accepting the proposed quantum of development for DHGV. This was made clear at the outset of commissioning the report and throughout the process of drafting but despite this the authors repeated ignored this fundamental requirement ie that the report was to assess options for a landscape corridor with the proposed quantum of development within both boroughs. Whilst the report has some interesting ideas, the fundamental scale of proposals are inappropriate. The Council are happy to continue the process of duty to cooperate with neighbouring boroughs, in particular to continue the development of the Dunton Masterplan Framework.</p>	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.37</b>				
22325 - Essex Bridleways Association (Mrs Sue Dobson) [3855]	Object	<p>Paragraph 9.37: we are very pleased to see in point (b) that horse riding has been acknowledged - this is good news - but WHY has this only been mentioned in one place within this Plan??? Outdoor recreation is an important part of this Plan but the need to cater for All users must be embedded throughout rather than what appears to be an afterthought.</p> <p><i>To make this Plan sound, ensure that access for ALL users is fully embedded within this whole Plan.</i></p>	Minor amendment proposed and through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 (i), detailed planning requirements as identified in the submission will be resolved.	No change
<b>9.40</b>				
23994 - CEG Land Promotions Limited [5050]	Object	<p>Paragraph 9.40 is unclear and an additional paragraph is needed regarding viewpoints and landscape features.</p> <p><i>In relation to paragraph 9.40, the following amendments are proposed:</i></p> <p><i>"Distinctive The significance of the landscape features and key views, including those to the such as London skyline and Langdon Hills, and others identified must should be retained and enhanced as part of the development. The development will also provide new publicly accessible viewpoints and characteristic landscape features as part of the Green and Blue Infrastructure across the site."</i></p> <p><i>New paragraph 9.41:</i></p> <p><i>"Grassy medians down the middle of streets should be used as a traffic calming tactic, especially on the larger roads which spur off the main A roads, to create lane separation for different transport modes."</i></p>	The proposed change is considered too prescriptive and is considered as part of the Masterplan Framework and Supplementary Planning Document	No change to local plan
<b>9.43</b>				
22441 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>4. Consistent with National Policy. Additional wording requested to ensure consistency with paragraph 175 of the NPPF.</p> <p><i>Change paragraph 9.43 to read as follows -</i></p> <p><i>Proposals will need to retain irreplaceable habitats such as ancient woodlands, veteran trees and fens ....'</i></p>	Disagree. The Council considers text already addresses the place outcome for this location in line with the NPPF. Therefore no change	No change

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.52</b>				
22327 - Essex Bridleways Association (Mrs Sue Dobson) [3855]	Object	<p>Paragraph 9.52/53/54: it is very disappointing to see yet again that cyclists are the only ones catered for here. Starting from a blank canvas gives the opportunity to ensure ACCESS FOR ALL, not just cyclists. All new routes should be designated as multi-user and not footway/cycleway which preclude the use by equestrians.</p> <p><i>To make this Plan sound, all new routes should be designated as multi-user and not footway/cycleway which preclude the use by equestrians.</i></p>	Consider minor change to reflect all non-motorised transport as part of the preparation of the Masterplan Framework.	No change to local plan
<b>9.60</b>				
23996 - CEG Land Promotions Limited [5050]	Object	<p>In the section on Social Place, in paragraph 9.60 it does refer to the farmstead being incorporated into the village core, we consider such a reference should be deleted for consistency with other policies</p> <p><i>Delete reference to in Para 9.60 that refers to the farmstead being incorporated into the village core.</i></p>	Disagree. Reference is considered appropriate. Change is not supported as this will ensure a sound and imbedded place outcome for the development.	No change
<b>9.72</b>				
22442 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified 3. Effective.</p> <p>The type or types of school that will best serve Dunton have yet to be properly considered and cannot be determined at this stage. The important consideration at this stage is ensuring appropriate opportunities for all learners of all ages. The DfE regulations for establishing a new school include appropriate consultation requirements that would be prejudiced by an assumption that any new school must be 'all through'.</p> <p>Paragraph 9.72 should be amended to reflect this.</p> <p><i>Amend paragraph 9.72 as follows - Strategic Objective DH02b (all through learning) will deliver exemplar education facilities that meet the needs of all types of learners through life, from nursery to adult learning opportunities.</i></p>	Noted. The change is considered minor in nature and therefore is not recommended. Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 detailed planning requirements as identified in the submission will be resolved.	No change



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
9.82 22443 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective. 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.</p> <p><i>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.</i></p>	Noted. The change is considered minor in nature and therefore is not recommended. Through preparation of the Masterplan Framework and Supplementary Planning Document for DHGV as a requirement of Policy RO1 detailed planning requirements as identified in the submission will be resolved.	No change

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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*Strategic Housing Allocations*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25839 - Mr Timothy Webb [5612]	Object	<p>Strongly object to all non-brownfield proposed housing site allocations. The local plan fails to fulfil the prescribed criteria because it involves a deliberate wanton, massive, wholesale destruction, despoliation, violation and vandalism of the countryside and the green Belt in contravention of the Town and Country Planning Acts and the five main purposes of the Green Belt as stipulated by the National Planning Policy Framework.</p> <p>This is with regard to Dunton Hills Garden Village (R01), Shenfield (R03), Blackmore (R25 and R26), two schemes at Kelvedon Hatch (R23 and R24), Doddinghurst Road (R16 and R17)</p> <p>Additionally the plan fails to satisfy the objectives of the sustainability appraisal with regard to Soils, Heritage, Landscape, Biodiversity.</p> <p>The Duty to Cooperate has not be met in that the views of statutory bodies have not been met regarding Dunton Hills Garden Village.</p> <p>The concerns of Blackmore Parish Council on R25 and R26 have been treated with contempt.</p> <p><i>Planning are building according only to absolute irrefutable necessity and not based on hypothetical projections of dubious accuracy way into the future. Rejecting all development in the countryside/Green Belt, thereby respecting and upholding relevant statutes.</i></p> <p><i>Concentrating unavoidable development on brownfield sites. eg West Horndon industrial estate R02, Warley (R04 and R05) and Wates Way industrial estate (R15), followed in order of priority by Ingatestone (former Garden Centre R21 and other R22) and town centre car parks (R10, R11, R14) in each case seeking greater yield by increasing density and constructing additional storeys.</i></p> <p><i>Complying with the prescribed objectives of the sustainability appraisal.</i></p> <p><i>Respecting council taxpayers, and the democratic process by rejecting any, all developments where there is significant local opposition.</i></p> <p><i>All policy - local, regional, national, international should be predicated primarily on the need to restrict and ultimately reverse unsustainable population growth, not pander to it</i></p>	<p>The Spatial Strategy does prioritise the use of brownfield land in the urban areas wherever possible, however, in order to meet identified housing needs as stipulated in the NPPF it is necessary to utilise land within the Green Belt. This is because the capacity of available brownfield land in urban areas would not be able to meet housing needs in full. There has been a sequential approach taken to site selection as set out in paragraph 3.23 of the Pre-Submission Local Plan. This is to ensure the use of brownfield land is maximised and Green Belt releases are in locations which are sustainable (i.e. urban extensions) or of a strategic scale to allow for appropriate investment in services and infrastructure. The Council has been engaged with ongoing discussions with neighbouring authorities and is satisfied that the duty to cooperate has been met.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23715 - Ms Heather Dunbar [8337] 23826 - Sow & Grow Nursery (Mr. Derek Armiger) [303] 23852 - Ms Maxine Armiger [4656]	Support	Other larger housing site allocations are likewise not objected to, provided that there is no significant additional dwelling allocations added to them, either by way of additional land, or by way of significant additional density and dwelling provision, to the larger allocated sites.  <i>No specific change proposed</i>	Noted	No further action
23833 - Sow & Grow Nursery (Ms Kim Armiger) [4657]	Support	With the suggested minor amendments, and the noting of the ownership position, then Policy R07 and Allocated Site Plan and other references to the site in the Local Plan Submission Copy can be fully supported. Without such amendments the Policy is still supported but it is considered, given the land ownership position, that this would better clarify the Policy, and therefore the implementation of the Plan.  <i>With the suggested minor amendments, and the noting of the ownership position, then Policy R07 and Allocated Site Plan and other references to the site in the Local Plan Submission Copy can be fully supported. Without such amendments the Policy is still supported but it is considered, given the land ownership position, that this would better clarify the Policy, and therefore the implementation of the Plan.</i>	Noted	No further action
<i>West Horndon Industrial Estate</i>				
23346 - Mrs Carol Minter [2999]	Object	The Council are living in Never Never Land if they think people will use alternative forms of transport to the car .... people will use cars! West Horndon station is a 2 platform station which barely copes (in the rush hour) with the sudden impact of hundreds of people descending on such a tiny space. There is very little parking space and nowhere to allocate further spaces. The addition of buses coming in from Dunton Garden Suburb would exacerbate the problem further.  <i>I believe the plan to be unsound and not thought out thoroughly with common sense in mind. It is full of "ideas" that have not been sensibly thought through. Development at West Horndon and Dunton is unrealistic and unworkable.</i>	The Council recognises that infrastructure improvements will be needed to accommodate planned growth. The Infrastructure Delivery Plan sets out the identified mitigation both from a highways perspective as well as sustainable transport measures. It is understood that people will use their cars however, it is still important to provide the opportunities and encourage the use of sustainable forms of travel particularly as West Horndon has an existing railway station.	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22590 - Mr Sasha Millwood [4539]	Support	Given that this is an (underutilised) brownfield site, this seems like a sensible development, provided that it is of a suitably high density to reflect its proximity to West Horndon railway station. Also, it is vital that the displacement of the employment/industrial use is NOT utilised to justify inappropriate development elsewhere.  <i>No change proposed</i>	Noted	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY R02: LAND AT WEST HORNDON INDUSTRIAL ESTATE</i></b>				
22935 - Mr Kevin Craske [2712] 22936 - Mr Kevin Craske [2712] 22937 - Mr Kevin Craske [2712] 22939 - Mr Kevin Craske [2712] 22943 - Mr Kevin Craske [2712]	Object	<p>In previous neighbourhood consultations Brentwood residents have stated their priorities which were:-</p> <ul style="list-style-type: none"> <li>a) protection of the green belt</li> <li>b) protection of local character</li> <li>c) Re-use of existing buildings in Brentwood Town Hutton and Pilgrims Hatch</li> </ul> <p>It seems that the residents views only matter if they comply with the councils wishes but can be ignored if they do not. This plan will also change the local character as it will put a small town in Dunton and change West Horndon from a small village into a small town used as a stopping off point for the Dunton Town residents. This is a major hypocrisy to the espoused Borough statement of a Borough of Villages. The Green Belt around West Horndon and Dunton is meant to prevent the urban sprawl of London creeping along the A127 and A13 corridors. This is the most important part of the green belt in the whole country due to the extreme pressure on housing needs in the South East of England. To state that the Green Belt area around the A12/Shenfield area is somehow more important or of greater character is risible and frankly insults the intelligence. The Green Belt area around West Horndon is so far unaffected but will be completely ripped apart by this plan.</p> <p>What happened to the original spatial Option One for centralised growth in and around Brentwood Town Centre with re-use of Brownfield sites and expansion of the Town? What happened to spatial Option Two for a transport corridor led growth along the A12 and A128 area of the Borough? Were they just planning pie in the sky and a bit too difficult to carry out with a much easier option being to move the problem somewhere else a bit farther away?</p> <p><i>Remove sites near to the A127 from the plan</i></p>	<p>The NPPF requires local authorities to deliver a sufficient supply of homes through strategic policies based on a local housing need figure. The Council has developed the Local Plan over a number of iterations which has determined the spatial strategy. This sets out two broad growth corridors, the central Brentwood growth corridor and south Brentwood growth corridor. Using a sequential approach to site selection there has been a prioritisation of brownfield land in urban areas. However the capacity of brownfield land in the urban area is not enough to meet full housing needs, therefore Green Belt releases have also been necessary. Green Belt releases have been identified in locations which are sustainable (i.e. urban extensions) or of a strategic scale to allow for appropriate investment in services and infrastructure.</p>	No further action

## POLICY R02: LAND AT WEST HORNDON INDUSTRIAL ESTATE

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22423 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Object	<p>The policy should include a clear statement on delivering a measurable net gain in biodiversity.</p> <p><i>f. provision for new multi-functional green infrastructure, including public open space, "to deliver a measurable net gain in biodiversity"</i></p>	Noted. No changes proposed to site policy but will update Policy NE01 in line with NPPF requirements for securing net gains for biodiversity.	No further action
22837 - Lisa Atkinson [2991] 22843 - Mr Ian Atkinson [2993] 23344 - Mrs Carol Minter [2999]	Object	<p>West Horndon currently suffers from surface water flooding. A further 580 homes, together with all the extra infrastructure required to accommodate this volume of people, will exacerbate this problem. The Tillingham Hall development in the 1990s was abandoned, in part, due to this problem.</p> <p><i>The plan is unsound and not thought out thoroughly with common sense in mind. It is full of "ideas" that have not been sensibly thought through. Development at West Horndon and Dunton is unrealistic and unworkable.</i></p>	Policy R02 for the site allocation under Part C Infrastructure Requirements (C) sets out that the site is located within a Critical Drainage Area and is likely to require an individually designed mitigation scheme in consultation with the Lead Local Flood Authority (Essex County Council). Appropriate mitigation will need to be incorporated into the overall design of the scheme.	No further action
22835 - Lisa Atkinson [2991] 22841 - Mr Ian Atkinson [2993] 22917 - Mr Kevin Craske [2712] 22923 - Mr Kevin Craske [2712] 22927 - Mr Kevin Craske [2712]	Object	<p>The C2C rail line only has two tracks and the trains are already well above capacity at peak times. The roads around the village (A127, A128) are characterised by standstills and queues in both the morning and evening peaks. An additional 500 cars would have a very material impact on already severely strained and congested roads. It is not feasible for these roads to cope with the proposed development at Dunton Hills Garden Village and the proposed development by other councils, even with investment. It is also impossible to see how the train capacity could be upgraded sufficiently.</p> <p><i>Urge Brentwood Borough Council to rethink its current proposals and to come up with a revised plan that spreads the housing needs more fairly and equally across the Borough so that no one community is impacted so severely as in the current Plan.</i></p>	The Transport Assessment evidence that accompanies the Local Plan did not indicate any significant issues that would not be capable of being accommodated or mitigated. The Infrastructure Delivery Plan identifies a number of improvements to West Horndon Station and incorporation of sustainable measures both within West Horndon and Dunton Hills Garden Village in order to accommodate planned growth.	No further action.

## POLICY R02: LAND AT WEST HORNDON INDUSTRIAL ESTATE

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22444 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective</p> <p>4. Consistent with National Policy.</p> <p>ECC welcome that BBC has recognised the importance of ensuring that this site allocation should provide well-connected road layouts which allow for good accessibility. However, such a size of development should also be seeking to ensure that such layouts can accommodate passenger transport. This would be consistent with other policies contained within the Local plan including Policy BE14, and in line with paragraph 102 of the NPPF.</p> <p>Criterion B. e. of Policy R02 should therefore include reference to passenger transport.</p> <p><i>Amend Policy R02 B. e. as follows - provide well-connected internal road layouts which allow for good accessibility including for passenger transport;</i></p>	The Council considers that the current wording of the policy would not preclude the road access through the site being able to accommodate passenger transport if deemed appropriate.	No further action
22930 - Mr Kevin Craske [2712]	Object	<p>West Horndon and Dunton are adjacent to Basildon and Thurrock Boroughs. Both Boroughs are also considering the Dunton area for their own housing expansion needs so Dunton Village could end up as Dunton Town. Both councils have stated that there has been very limited consultation about perceived infrastructure or transport planning and do not seem to be very much in favour of Brentwood Borough future local development proposals. This is at odds with the statement in your LDP about local joint consultations with neighbouring boroughs. This is symptomatic of a lack of joined up thinking in the planning process.</p> <p><i>No specific change proposed</i></p>	The Council has been actively engaged with ongoing discussions with neighbouring authorities and is satisfied that the requirements of the duty to cooperate have been met.	No further action
22368 - Rochford District Council (Planning Policy) [4178]	Support	<p>The Council is broadly supportive of the proposed housing allocations within the draft Plan but suggests that Brentwood Borough Council should satisfy itself and the Inspector that the cumulative impacts of planned and unplanned growth on local and strategic infrastructure can and will be mitigated, both within Brentwood Borough and across South Essex as a whole.</p> <p><i>Ensure cumulative impacts of development on local and strategic infrastructure can and will be mitigated, both within Brentwood Borough and across South Essex as a whole.</i></p>	The impacts of development proposed within the Local Plan on infrastructure have been assessed through the Infrastructure Delivery Plan and any required mitigation identified within the Part B Schedule.	No further action



## POLICY R02: LAND AT WEST HORNDON INDUSTRIAL ESTATE

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
25799 - Mr Matthew Ionescu [8576]	Support	Agree with development of West Horndon Industrial Estate.  <i>Has considered local opinion to an extent but requires further local consultation with residents.</i>	Noted	No further action
22247 - Mr and Mrs Paul McEwen [4610] 22589 - Mr Sasha Millwood [4539]	Support	Given that this is an (underutilised) brownfield site, this seems like a sensible development, provided that it is of a suitably high density to reflect its proximity to West Horndon railway station. Also, it is vital that the displacement of the employment/industrial use is NOT utilised to justify inappropriate development elsewhere.  <i>No change proposed</i>	Noted	No further action
23650 - Countryside Properties [250]	Support	Growth at West Horndon rather than Dunton Hills has historically been supported by Thurrock and Basildon in their response to the emerging Plan for Brentwood. Reasons include its proximity to existing infrastructure such as a railway station, less impact in landscape terms and in relation to the key purposes of the Green Belt, such as coalescence (with Basildon). Crucially, land at West Horndon would be able to deliver much needed housing in the first five years of the Local Plan.  <i>The SA and evidence base do not support the spatial strategy for growth set out in the Local Plan. The Local Plan process should be suspended to allow a fundamental review of the SA.</i>	The Local Plan has been through a number of iterations with the Spatial Strategy developed over this time. The identification of Dunton Hills Garden Village provides the opportunity to develop a new stand alone village which fits into the context of the area being a Borough of Villages. It also allows for significant investment in necessary infrastructure to create a sustainable location for growth. There is still significant growth proposed in West Horndon with the opportunity to redevelop the industrial estate next to the railway station. The various options for strategic growth have been rigorously assessed in the Sustainability Appraisal that accompanies the Local Plan. This includes an assessment of the option to develop around West Horndon to the east and west. In terms of comparison the quantum of growth would be less than what Dunton Hills Garden Village could deliver and also this would significantly alter the character of the village.	No further action

## POLICY R02: LAND AT WEST HORNDON INDUSTRIAL ESTATE

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23810 - Mr Carl Croll [8053]	Support	Our client's site is referenced as Site 152 in the Council's Emerging Local Plan and HELAA. In the previous Preferred Site Allocations Document (Regulation 18), there were some minor inconsistencies regarding the extent of the site proposed for allocation when compared to the client's land ownership. Following Strutt & Parker's previously submitted representations, we are happy to confirm that these inconsistencies no longer remain. Subject to the progress of the intended masterplan process as set out at Policy R02, there is an opportunity to bring forward the site earlier in the plan period.  <i>No change proposed</i>	Noted	No action proposed.
23807 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738]	Support	SUPPORT & COMMENT: Hermes' draft masterplan for the whole site includes a variety of dwelling types, including flats (making up the proposed village centre, nearest to the Station Road entrance and West Horndon station) and 2, 3 & 4 bed houses. At present, the R02 site measures 17.6 hectares gross, which nets down to 15hectares (after allowing for 15% POS and landscaping) in the latest draft of the masterplan. The current layout is nearer 750 dwellings, which is well over the figure of "around 580 new homes" set out in the policy.  <i>Clarify dwelling numbers for this site</i>	The 580 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher than the dwelling numbers indicated provided it is in conformity with other policies in the plan.	No further action
23286 - West Horndon Parish Council (Mr Kim Harding) [381]	Support	The Parish Council supports the allocation of the land at West Horndon Industrial Estate (Policy R02) for residential, care home and appropriate employment uses.  <i>No change proposed</i>	Noted	No further action
23252 - Mid and South Essex STP (Kerry Harding) [3791]	Support	As a result of development on site R01 and R02, development of a new health facility will be required to be phased to align with housing delivery trajectory. Collaboration agreement, secure Wi-Fi and clinical system installation and maintenance are required as part of mitigation within Care Homes. The exact nature and scale of mitigation required to meet augmented needs of proposed developments will be calculated at an appropriate time, as and if schemes come forward.  <i>No specific change proposed</i>	This is in line with Policy R02 which requires under Infrastructure Requirements Part C (b) the provision for health facilities.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.91</b>				
23345 - Mrs Carol Minter [2999]	Object	<p>Station Road in West Horndon is already unable to cope with the current volume of traffic. It is a country lane with a sharp double bend where the road crosses the railway line. This part of the road is a major hazard with frequent accidents. 580 new properties will result in a minimum of 580 cars exiting onto what is already a major danger spot. Station Road is also used as a "rat run" when the M25, A127 and A13 are closed, running slowly, or congested.</p> <p><i>I believe the plan to be unsound and not thought out thoroughly with common sense in mind. It is full of "ideas" that have not been sensibly thought through. Development at West Horndon and Dunton is unrealistic and unworkable.</i></p>	Through masterplanning work as required in Policy R02 Part B (a) and in consultation with the Highway Authority any application that comes forward for the site will need to address the access arrangements for the site ensuring that they meet safety standards. This is considered to be achievable and it is only through redevelopment of the site that there will be an opportunity to address this recognised issue.	No further action
<b>9.97</b>				
22445 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified 3. Effective 4. Consistent with National Policy.</p> <p>Request replacement of paragraph 9.97 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Replace paragraph 9.97 with the following wording: The site falls within 2 Critical Drainage Areas (CDA) Hor2 and Hor3 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 Lead Local Flood Authority (LLFA) in this area is critical to ensure that existing and potential flood risk is properly managed.</i></p>	Existing wording for paragraph 9.97 is still considered appropriate to meet the aims of what is being described	No further action

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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*POLICY R03: LAND NORTH OF SHENFIELD*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24141 - Wiggins Gee Homes Ltd [2788]	Object	<p>R03 is one of the Pre-Submission Document's strategic allocations. Much of this allocation seems sensible and logical. It is bounded to the north-west by the A12 and south-east by the main railway line. As with Policy R16 and R17, R03 says new development should consider providing for: "appropriate landscaping and buffers along sensitive boundary adjoining the A12."</p> <p>As with Policy R16 and R17, Policy R03 should be more strongly worded to insist on appropriate mitigation measures.</p> <p>Two parts of the allocation which should be removed and left in the Green Belt. The first is the elliptical shaped piece of land between the A1023 Chelmsford Road and the A12 Marylands Interchange, unless it is specifically reserved for the employment uses mentioned in Policy R03, the second is an area to the north of the site bounded by the Marylands Interchange to the north, the railway line to the south-east, a part of Arnold's Wood to the south-west and Chelmsford Road to the north-west. They would provide poor and unhealthy environment, being close to the interchange and main railway. Residential development this close to Arnolds Wood can only be detrimental. R03, R16, R17, R21, R22 allocations are all bounded by the A12 to a greater or lesser extent. As noted in our representations on Policy NE05, the Pre-Submission Document's paragraph 8.50 states that transport generated emissions are the prime source of air pollution in the Borough. We have consistently questioned the wisdom of locating new housing next to the A12 on the grounds of public health. All these proposed allocations, in whole or part, have significant issues resulting from their proximity to principal sources of air and noise pollution. There is conflict with the Pre-Submission Document's own policies on these issues, including Policy NE05. Consequently we are suggesting a number of modifications to the relevant policies.</p> <p><i>We propose the following modifications for the reasons outlined in our response to the Local Plan consultation. Strengthen the wording of all policies to ensure that appropriate air and noise pollution measures form an integral part of any development proposals. Wherever there is reference to either the A12, or the mainline railway, the related criterion</i></p>	<p>Policy SP01 Sustainable Development sets out under Part D (d) &amp; (e) the need for all development to consider the impact of residential amenity including noise and health. In addition Policy R03 sets out under Part B Development Principles (j) the need for appropriate landscaping and buffers along sensitive boundaries adjoining the A12 and railway line. Part (i) of the same Policy also requires that the Local Wildlife site (Arnold's Wood) is protected and enhanced.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>should read as follows:            "appropriate measures, including barriers, embankments and landscaping, to reduce air and noise must be provided along the site's boundary(ies) with the A12 and/or the mainline railway."            Removal of R17 from Policy R16 and R17.            Removal from proposed allocation R03 of the elliptical shaped piece of land between the A1023 Chelmsford Road and the A12 Marylands Interchange, and the area to the north of the site bounded by the Marylands Interchange to the north, the railway line to the south-east, a part of Arnold's Wood to the south-west and Chelmsford Road to the north-west.            Removal of Allocation R21 on grounds of poor physical environment, isolation from the main settlement of Ingatestone and coalescence with the village of Mounthnessing.            Removal of Allocation R22 on grounds of poor physical environment.</p>		
25797 - Mrs Susan Walker [2825]	Object	<p>Object as the site is Green Belt, it will cause congestion, road safety issues, air quality problems, parking problems, loss of green space, pressure on sewerage and water supply Whilst proposing a new school it isn't proposing more GP facilities. With libraries closing and pressure on other facilities there will be a lack of facilities for new residents. The developer has too much say in the sort of housing that is built rather than the council.</p>	<p>The NPPF requires local authorities to deliver a sufficient supply of homes through strategic policies based on a local housing need figure. The Council has developed the Local Plan over a number of iterations which has determined the spatial strategy. This sets out two broad growth corridors, the central Brentwood growth corridor and south Brentwood growth corridor. Using a sequential approach to site selection there has been a prioritisation of brownfield land in urban areas. However the capacity of brownfield land in the urban area is not enough to meet full housing needs, therefore Green Belt releases have also been necessary. Green Belt releases have been identified in locations which are sustainable (i.e. urban extensions) or of a strategic scale to allow for appropriate investment in services and infrastructure. The Council has worked with the NHS as well as others in preparing the Infrastructure Delivery Plan which identifies what infrastructure is appropriate in mitigating proposed development.</p>	No further action
		Remove site R03 from plan		

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<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22954 - D Westfall [5310] 22955 - D Westfall [5310]	Object	<p>Far too many houses with no apparent provision for extra supporting services i.e. school places, Doctors/Dentists surgeries, local shops to serve the new estate etc. Little or no extra local transport infrastructure with regards to main road or rail links. The existing nearby road and rail links are near bursting point already, esp at rush hour(s).</p> <p><i>Fewer houses to be built, the total is far too many in too short a period of time. OR provide the required supporting service first, i.e. extra local hospitals, more local doctors/dentists, much better rail links, much better bus links etc, and then build your new town.</i></p>	The Council recognises that infrastructure improvements will be needed to accommodate planned growth. The Infrastructure Delivery Plan sets out the identified mitigation required across a range of matters. This has been prepared in consultation with a number of Statutory Bodies and organisations such as the NHS, Essex County Council etc.	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22392 - Sport England (Mr. Roy Warren) [4294]	Object	<p>Sport England objects to part of the allocation of Land north of Shenfield, for residential development in the local plan as it would potentially result in the loss of operational playing field sites at Shenfield High School and Alexander Park that are used extensively by the community and Shenfield High School without any proposals for mitigation in the site allocation policy. This would be contrary to Government policy in the NPPF, policy BE23 of the emerging local plan and Sport England's playing fields policy that is used as a statutory consultee.</p> <p><i>The removal of the Shenfield High School and Alexander Park playing fields from the R03 from the local plan would be the preferred solution to addressing this objection. However, as an alternative, potential may exist for this objection to be addressed in accordance with paragraph 97 of the NPPF, policy BE23 of the local plan and Sport England's playing fields policy if the playing fields were acceptably replaced as a requirement of the site allocation policy. To address this, the development principles in the site allocation policy would need to set out that the playing fields and supporting facilities at Shenfield High School and Alexander Park would either need to be retained unless replacement playing field provision (including ancillary facilities such as the pavilion and car parking) was made which was equivalent or better provision in terms of quantity and quality on the wider site allocation prior to any development commencing. Any replacement provision would need to avoid prejudicing Shenfield High School or the community from meeting their needs.</i></p> <p><i>The authority will be aware that Sport England would be a statutory consultee on any future planning application for development on this site which affects the playing fields. As the principle of development on this site will be considered through the local plan rather than a planning application, it will be important that the Council engages Sport England with a view to reaching a mutually agreeable solution through the local plan process. We would wish to avoid a potential scenario where we would have no option but to object to a future planning application due to the matters set out above not being satisfactorily addressed through</i></p>	<p>The Council recognises the need to address the issue of potential loss of playing field space if the new Primary School is built on the existing Shenfield High School playing field. The Council is actively engaged with Sport England and have agreed that the best way to deal with this matter would be through a Statement of Common Ground. The Council and Sport England have advised the site promoters to establish potential suitable replacement provision. The details of any potential amendment to the wording of Policy R03 can be established following the conclusion of this process.</p>	<p>Statement of Common Ground to be established between the Council and Sport England following agreement on appropriate mitigation for potential playing field loss.</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p><i>the local plan. This scenario is likely to result in uncertainties and delays with respect to the delivery of development on this site.</i></p> <p><i>To take this matter forward with a view to reaching a mutually agreeable solution in advance of the matter being considered at the local plan examination, the Council are urged to engage with Sport England to explore a potential solution.</i></p>		
25796 - Mr John Walker [8572]	Object	<p>The local plan is unsound with respect to R03 Land north of Shenfield. This lane is green belt and should not be considered for housing as there are areas of brownfield sites within the borough.</p> <p>In proposing to build 800 houses in this location will create a number of problems on the surrounding areas.</p> <p>With newly completed Mountnessing estate, the proposed development of the Ingatestone Garden centre site - an additional 2000 vehicles could be using the local roads with journeys to and from Shenfield railway station.</p> <p>The Chelmsford main road is often congested with the no of vehicles using the road during peak rush hour and on the numerous occasions when the A12 has problems. This can increase traffic using the Shenfield Park estate to find alternative roads into Brentwood or to Shenfield railway station. This already adds to the poor air quality and atmosphere with the CO2 emissions under the railway bridges.</p> <p>With this additional traffic on the Chelmsford road, this can cause further problems with burst water mains and may effect the aging water, gas and sewage systems.</p> <p>With this development a new primary school is planned, but I believe there is no provision for a new doctors surgery. At present the waiting time for appointments the Shenfield surgeries is long and frustrating.</p> <p><i>Consideration should be given to development of smaller sites with reduced number of homes in each location. Maximum use of Brownfield sites within the borough. Change of use for existing vacant retail properties to housing of flats. Consideration for further housing on the William Hunter Way site.</i></p>	<p>The NPPF requires local authorities to deliver a sufficient supply of homes through strategic policies based on a local housing need figure. The Council has developed the Local Plan over a number of iterations which has determined the spatial strategy. This sets out two broad growth corridors, the central Brentwood growth corridor and south Brentwood growth corridor. Using a sequential approach to site selection there has been a prioritisation of brownfield land in urban areas. However the capacity of brownfield land in the urban area is not enough to meet full housing needs, therefore Green Belt releases have also been necessary. Green Belt releases have been identified in locations which are sustainable (i.e. urban extensions) or of a strategic scale to allow for appropriate investment in services and infrastructure. The Transport Assessment evidence that accompanies the Local Plan did not indicate any significant issues that would not be capable of being accommodated or mitigated. The Council has worked with the NHS as well as others in preparing the Infrastructure Delivery Plan which identifies what infrastructure is appropriate in mitigating proposed development.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22424 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Object	<p>g. provision for new multi-functional green infrastructure including public open space;</p> <p>The above statement should be amended to include a commitment to deliver a measurable net gain in biodiversity.</p> <p>i. protect and where appropriate enhance the Local Wildlife Site (Arnold's Wood).</p> <p>The caveat "where appropriate" in the above statement should be deleted. It is unnecessary and potentially creates ambiguity which could provide a loophole for developers to do nothing. There should be a clear policy commitment to ensure no net loss in habitat quality of the local wildlife site and preferably a measurable net gain.</p> <p><i>g. provision for new multi-functional green infrastructure including public open space "to deliver a measurable net gain in biodiversity";</i></p> <p><i>i. protect and enhance the Local Wildlife Site (Arnold's Wood) to deliver a measurable net gain in habitat quality and biodiversity.</i></p>	Noted. No changes proposed to site policy but will update Policy NE01 in line with NPPF requirements for securing net gains for biodiversity.	No further action
22447 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective.</p> <p>4. Consistent with National Policy. Criterion B. f. of Policy R03 should include reference to passenger transport (see comments to Policy R02 - Land at West Horndon Industrial Estate).</p> <p><i>Amend Policy R03 B. f. as follows - provide well-connected internal road layouts which allow for good accessibility including for passenger transport;</i></p>	The Council considers that the current wording of the policy would not preclude the road access through the site being able to accommodate passenger transport if deemed appropriate.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23765 - Strutt & Parker LLP (Jen Carroll) [6751]	Object	<p>The proposed provision of employment uses on this site has not been justified and is not effective. The provision of 2ha on this site is not required to meet the Borough's identified employment need and conflicts with the deliverability of new homes on the site to meet the Council's housing need.</p> <p><i>The provision of 2ha of land for employment purposes should be removed from the policy. In order to make Policy R03 effective, it is proposed that the wording in part (e) of the Policy is removed in its entirety, and for part A of Policy R03 to read: a) Amount and type of development; b) Provision for at least 825 new homes of mixed size and type, including affordable housing; c) Provision of land (circa 2.1 hectares) for a co-located primary school and early years and childcare nursery (Use Class D1); d) Provision for a residential care home (around 60 bed scheme as part of the overall allocation); and e) Provision for 5% self-build and custom build across the entire allocation area. The Policy wording should also be changed to state that "at least..." rather than "around 825 homes".</i></p>	<p>The sites location represents an opportunity for small scale employment uses particularly near the A12 junction and also its proximity to Shenfield railway station. The spatial strategy identifies two growth corridors and recognising there is a need to allocate land for employment purposes in both areas. It is considered that the delivery of employment land wouldn't significantly impact on the delivery of homes in this location.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24014 - Croudace Strategic Ltd [2656]	Support	<p>Largely supportive, however there are some aspects we do not consider to be "sound". In particular:</p> <p>*Criterion b under Amount and Type of Development: Earlier/recent work undertaken by the High School (and others) considered the anticipated need for a new 1FE Primary School. The proposed policy wording should clarify that it is now proposing a 2FE Primary School.</p> <p>*Criterion d, under Amount and Type of Development: the evidence base and local need should be fully assessed before any commitment is made to the provision of Custom and Self Build in this location. Suggest policy is amended to "up to" 5%</p> <p><i>Amend criteria b and d under Amount and Type of Development as followed:</i></p> <p><i>b. Provision of land (circa 2.1 hectares) for a co-located 2FE primary school and early years and childcare nursery (Use Class D1). To be located adjacent to Alexander Lane.</i></p> <p><i>d. Provision for up to 5% self-build and custom build across the entire allocation area.</i></p>	<p>The need for a 2FE Primary School in this location was established in consultation with the Local Education Authority and 2.1 hectares was advised as being the appropriate amount of land needed to accommodate a 2FE Primary School. The need for the 2FE Primary School is also reflected in the Infrastructure Delivery Plan.</p> <p>The requirement for 5% Custom and Self Build properties has been applied to all Strategic site allocations over 500 dwellings as these are felt to be large enough to accommodate these needs.</p>	No further action
23947 - Shenfield High School [4419]	Support	<p>Support. Have been working with Croudace and Hutton FC to provide solutions to the need for an increase in education provision and to provide a football ground, and to identify locations for shared spaces (green space and/or community opportunities).</p> <p><i>No specific change proposed</i></p>	Noted	No further action
23253 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Anticipated mitigation as a result of development on sites R03 and R20 should include contribution towards increasing capacity by means of extension, reconfiguration, possible relocation of an existing service/s or/and recruitment costs. Collaboration agreement, secure Wi-Fi and clinical system installation and maintenance will be required as part of mitigation within Care Homes.</p> <p><i>Anticipated mitigation as a result of development on sites R03 and R20 should include contribution towards increasing capacity by means of extension, reconfiguration, possible relocation of an existing service/s or/and recruitment costs. Collaboration agreement, secure Wi-Fi and clinical system installation and maintenance will be required as part of mitigation within Care Homes.</i></p>	<p>The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.</p>	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
24015 - Croudace Strategic Ltd [2656]	Support	<p>Support requirements with regards to: a care home provision, although this should be subject to the balanced and reasonable distribution of other infrastructure across the Site; 2ha of employment land; provision of a comprehensive masterplan and phasing strategy; vehicular access via Chelmsford road and Alexander Lane; potential diversion of Alexander Lane in terms of pedestrian safety and improved access; provision of green infrastructure and open space; maintenance and enhancement of the existing PRow; Local Wildlife Site; pedestrian and cycle crossing points across Chelmsford Road; provision of an improved bus service; surface water flooding mitigation scheme.</p> <p><i>Support requirements with regards to: a care home provision, although this should be subject to the balanced and reasonable distribution of other infrastructure across the Site; 2ha of employment land; provision of a comprehensive masterplan and phasing strategy; vehicular access via Chelmsford road and Alexander Lane; potential diversion of Alexander Lane in terms of pedestrian safety and improved access; provision of green infrastructure and open space; maintenance and enhancement of the existing PRow; Local Wildlife Site; pedestrian and cycle crossing points across Chelmsford Road; provision of an improved bus service; surface water flooding mitigation scheme.</i></p>	Noted	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.98</b>				
22588 - Mr Sasha Millwood [4539]	Object	<p>As stated elsewhere, I object in the strongest terms to any damage to the green belt. It is even more perverse where such damage takes the form of low-density development. Given the excellent public transport, the Council should adopt a policy of requiring that any new development near Shenfield must be blocks of flats, not houses.</p> <p><i>No development on Officer's Meadow. Add policy that any development in/near Shenfield must be blocks of flats, not houses, since public transport excellent.</i></p>	<p>Using a sequential approach to site selection there has been a prioritisation of brownfield land in urban areas. However the capacity of brownfield land in the urban area is not enough to meet full housing needs, therefore Green Belt releases have also been necessary. Green Belt releases have been identified in locations which are sustainable (i.e. urban extensions) or of a strategic scale to allow for appropriate investment in services and infrastructure. Policy HP03 Residential Densities, requires that development should take a design led approach to density which ensures schemes are sympathetic to local character and make efficient use of land.</p>	No further action
<b>9.100</b>				
22448 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>The second sentence in paragraph 9.100 refers to community services and facilities being accessible 'to the majority of residents in the development'. Policy BE13 requires sustainable modes of transport to be facilitated through new developments to promote accessibility and integration into the wider community and existing networks. It is considered that the wording in paragraph 9.100 contradicts this and should be deleted.</p> <p><i>Delete the following words from the end of paragraph 9.100 - 'to the majority of residents in the development.'</i></p>	Agree with suggested edits	Delete 'to majority of residents in the development' at the end of paragraph 9.100.

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.105</b>				
22449 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified. 3. Effective. 4. Consistent with National Policy. Request amendment to second sentence of paragraph 9.105 and full paragraph of 9.170 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Replace second sentence of paragraph 9.105 and the full paragraph 9.170 with the following wording -</i></p> <p><i>The site falls within the Shenfield 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.</i></p>	Existing wording for paragraph 9.105 is still considered appropriate to meet the aims of what is being described.	No further action
<b>POLICY R04 AND R05: FORD HEADQUARTERS AND COUNCIL DEPOT</b>				
23584 - Brentwood Bus and Rail Users' Association (Cllr David Jobbins) [4922]	Object	<p>The Ford Offices, although served by buses, is too far for most people to consider the station walkable while Brentwood High St most certainly is not. It is assumed that most people would find it possible to walk to Brentwood station and to the High Street.</p> <p><i>The Ford Offices, although served by buses, is too far for most people to consider the station walkable while Brentwood High St most certainly is not. It is assumed that most people would find it possible to walk to Brentwood station and to the High Street. Correct this</i></p>	This is considered to be in a sustainable location well served by public transport.	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22570 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Object	<p>The policy wording is ambiguous and lacks a commitment to deliver a net gain in biodiversity.</p> <p><i>Remove the caveat "where appropriate". This is unnecessary and ambiguous, creating a loophole for developers to do nothing.</i></p> <p><i>g. protect and enhance the Local Wildlife Sites (Barrack Wood/Donkey Lane Plantation) and deliver a measurable net gain in biodiversity.</i></p>	Noted. No changes proposed to site policy but will update Policy NE01 in line with NPPF requirements for securing net gains for biodiversity.	No further action
24123 - Ford Motor Company (Mr Clive Page) [3769]	Object	<p>Ford objects to the retention of 2ha of employment floorspace specifically at the land south of Eagle Way in the absence of robust evidence to justify this, in tandem with acknowledging that the Site is no longer suitable for such uses. It is also apparent that BBC actually have a surplus of employment supply over the plan period, including at other more suitable sites across the Borough, whereby there is no logical or sound reasoning for the retention of 2ha of employment floorspace at the main Ford site. Ford also wishes to challenge the inclusion of a 60-bed care home and 5% custom build housing across the wider RO4 and RO5 Draft allocation - in the absence of any sound justification for this. Ford wish to highlight that it is not possible to feasibility accommodate the amount of development currently included across the collective allocation - in the form which the market demands, whereby the provision of a care home and 2ha of employment floorspace significantly reduces the net developable area and ability to deliver up to 350 new homes on the Ford owned land. Therefore, we object to the inclusion of these additional land uses in the interests of ensuring that the Site can be maximised for much needed housing development.</p> <p><i>Seek to have the Council's owned land (the Depot) and the Ford site be separated to allow for the Ford site to come forwarded earlier on in the Plan period to provide residential development.</i></p>	The sites location represents an opportunity for small scale employment uses which reflects the historic use of the area for employment and also is appropriate in complementing a strategic scale development. The spatial strategy identifies two growth corridors and recognising there is a need to allocate land for employment purposes in both areas. It is considered that the delivery of employment land wouldn't significantly impact on the delivery of homes in this location. The requirement for a care home and 5% Custom and Self Build properties has been applied to all Strategic site allocations over 500 dwellings as these are felt to be large enough to accommodate these needs.	No further action

## POLICY R04 AND R05: FORD HEADQUARTERS AND COUNCIL DEPOT

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22452 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective. Policy R04 and R05 B. d. covers 2 separate matters (community facilities and open space) and should be split into two criteria.</p> <p><i>Amend Policy R04 and R05 as follows to separate into two criteria -</i>  <i>d. integrate existing community facilities within new development;</i>  <i>e. provision for new multi-functional green infrastructure including public open space;</i></p>	Agree with suggested edits.	Split criterion B (d) into d. integrate existing community facilities within new development and e. provision for new multi-functional green infrastructure including public open space.
22451 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective. 4. Consistent with National Policy. Criterion B. c. of Policy R04 and R05 should therefore include reference to passenger transport (see comments to Policy R02 - Land at West Horndon Industrial Estate).</p> <p><i>Amend Policy R04 and R05 B. c. as follows -</i>  <i>provide well-connected internal road layouts which allow for good accessibility including for passenger transport;</i></p>	The Council considers that the current wording of the policy would not preclude the road access through the site being able to accommodate passenger transport if deemed appropriate.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24118 - Ford Motor Company (Mr Clive Page) [3769]	Support	<p>Ford wishes to voice support in principle for the Draft allocation in the PSD for future residential development - including up to 350 new dwellings on the Ford owned land This is highlighted with specific regards to the Site's situation within the Brentwood / Urban Area settlement boundary; comprising of previously developed brownfield land whereby the NPPF (2018) and PSD (2019) acknowledges that housing growth should be directed as a matter of priority in promoting sustainable development (providing a sound policy basis under the test of soundness within the NPPF). The need for BBC to identify additional land for housing is also required in order to address cross-boundary pressures such as London's future housing growth, which has been exemplified within relevant London Plan EiP hearing sessions. In this context, the Mayor of London has confirmed that local planning authorities within the wider south east, where the housing market is influenced by that of London should be working collaboratively with the GLA to significantly boost the supply of housing and ensure that Local Plans meet full objectively assessed needs.</p> <p>Changes to Plan: Ford request that the Draft allocation is revised to reflect the Ford owned land being available and deliverable earlier in the plan period - notably, 1-5 years versus the 9-17 years currently referenced within the PSD under the collective allocation with the Council Depot. This will help to deliver a significant degree of Brentwood's housing requirement in the short term (in line with the key objective of the NPPF with regards to boosting the supply of housing without delay).</p> <p><i>Ford request that the Draft allocation is revised to reflect the Ford owned land being available and deliverable earlier in the plan period - notably, 1-5 years versus the 9-17 years currently referenced within the PSD under the collective allocation with the Council Depot. This will help to deliver a significant degree of Brentwood's housing requirement in the short term (in line with the key objective of the NPPF with regards to boosting the supply of housing without delay).</i></p>	In assessing the delivery timeframes of sites the Council has taken a cautious approach and considers the estimate for site allocation R04 and R05 to be reasonable at the point of formulating the plan considering which was based on the likely lead in time needed for the site to be vacated, application timeframes including masterplanning, any demolition works to be completed and remediation.	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23213 - Thames Water (On behalf of Thames Water) [1927]	Support	<p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.</p> <p><i>Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.</i></p>	The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.	No further action
23255 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Anticipated mitigation as a result of development on sites R04&amp;05, R06, R08, R09, R10 should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs. Collaboration agreement, secure Wi-Fi and clinical system installation and maintenance will be required as part of mitigation within Care Homes.</p> <p><i>no change proposed</i></p>	The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.108</b>				
22175 - Ms Susan Henry [6847]	Support	<p>Glad you have considered the band in the consultation, concerned of possible complaints regarding noise and parking issues from the new residents. What was the thinking of the consultation team regarding these points.</p> <p><i>Glad you have considered the band in the consultation, concerned of possible complaints regarding noise and parking issues from the new residents. What was the thinking of the consultation team regarding these points.</i></p>	Policy R04 and R05 requires that a comprehensive masterplan is developed for the site, through this work there will need to be consideration of how the site relates to surrounding uses. In addition Policy SP01 Sustainable Development requires developments to have consideration of a sites impact on the surrounding with good design principles expected to be adopted.	No further action
<b>9.112</b>				
22453 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified. 3. Effective. 4. Consistent with National Policy. Request replacement of paragraph 9.112 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Replace paragraph 9.112 with the following wording:</i></p> <p><i>The northern part of the site (R05) falls within the Thrift Green 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.</i></p> <p><i>The southern part of the proposed development area (R04) is not within areas identified at risk of flooding. It should however be ensured that any development within this area complies with flood risk mitigation measures outlined in the Essex SuDS guide.</i></p>	Existing wording for paragraph 9.112 is still considered appropriate to meet the aims of what is being described.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Housing Allocations</i>				
24067 - Countryside Properties [250]	Object	<p>SITE CHANGE</p> <p>Hutton was identified as Category 1 - an 'urban neighbourhood'. Irrespective of the above, the PSLP proposes no growth for Hutton, in contrast to the level of growth afforded to other settlements identified as Category 1 settlements, or also those below Hutton, within the Borough's settlement hierarchy. We have concerns therefore that the PSLP fails to support the sustainable growth of Hutton and that this omission is unjustified and inconsistent with national policy.</p> <p><i>To ensure the soundness of the Local Plan, land should be allocated in Hutton to protect the future of this settlement and ensure sustainable growth.</i></p>	<p>The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25840 - Mr Timothy Webb [5612]	Object	<p>Strongly object to all non-brownfield proposed housing site allocations. The local plan fails to fulfil the prescribed criteria because it involves a deliberate wanton, massive, wholesale destruction, despoliation, violation and vandalism of the countryside and the green Belt in contravention of the Town and Country Planning Acts and the five main purposes of the Green Belt as stipulated by the National Planning Policy Framework.</p> <p>This is with regard to Dunton Hills Garden Village (R01), Shenfield (R03), Blackmore (R25 and R26), two schemes at Kelvedon Hatch (R23 and R24), Doddinghurst Road (R16 and R17)</p> <p>Additionally the plan fails to satisfy the objectives of the sustainability appraisal with regard to Soils, Heritage, Landscape, Biodiversity.</p> <p>The Duty to Cooperate has not be met in that the views of statutory bodies have not been met regarding Dunton Hills Garden Village.</p> <p>The concerns of Blackmore Parish Council on R25 and R26 have been treated with contempt.</p> <p><i>Planning are building according only to absolute irrefutable necessity and not based on hypothetical projections of dubious accuracy way into the future. Rejecting all development in the countryside/Green Belt, thereby respecting and upholding relevant statutes.</i></p> <p><i>Concentrating unavoidable development on brownfield sites. eg West Horndon industrial estate R02, Warley (R04 and R05) and Wates Way industrial estate (R15), followed in order of priority by Ingatestone (former Garden Centre R21 and other R22) and town centre car parks (R10, R11, R14) in each case seeking greater yield by increasing density and constructing additional storeys.</i></p> <p><i>Complying with the prescribed objectives of the sustainability appraisal.</i></p> <p><i>Respecting council taxpayers, and the democratic process by rejecting any, all developments where there is significant local opposition.</i></p> <p><i>All policy - local, regional, national, international should be predicated primarily on the need to restrict and ultimately reverse unsustainable population growth, not pander to it.</i></p>	<p>The Spatial Strategy does prioritise the use of brownfield land in the urban areas wherever possible, however, in order to meet identified housing needs as stipulated in the NPPF it is necessary to utilise land within the Green Belt. This is because the capacity of available brownfield land in urban areas would not be able to meet housing needs in full. There has been a sequential approach taken to site selection as set out in paragraph 3.23 of the Pre-Submission Local Plan. This is to ensure the use of brownfield land is maximised and Green Belt releases are in locations which are sustainable (i.e. urban extensions) or of a strategic scale to allow for appropriate investment in services and infrastructure. The Council has been engaged with ongoing discussions with neighbouring authorities and is satisfied that the duty to cooperate has been met.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24393 - Chelmsford Diocesan Board of Finance [2627]	Object	<p><b>SITE CHANGE</b></p> <p>Hutton is the second largest settlement in the Borough. In 2011, the town had a population of 15,578 and a total of 6,564 dwellings (Census 2011). It is a large, established community and a local centre which benefits from a range of services, facilities, access to public transport, and employment opportunities. Hutton is situated approximately 30 kilometres from Central London, 12 kilometres from Chelmsford and in a position well related to regional and national infrastructure. Hutton lies in close proximity to Brentwood and Shenfield on the A12 corridor. Hutton has strong service and education provision. The settlement benefits from excellent access to Shenfield High Street on the Hutton Road which adjoins Rayleigh Road and runs centrally through the settlement on an east-west axis. The High Street provides a variety of services, shops and businesses. The PSLP sets out the Borough's settlement hierarchy. Hutton is identified as Category 1 - Main Town. It is clearly a sustainable location to which a proportion of the Borough's housing need should be directed. In addition, as an established community, it is important that the Local Plan manages the growth of the settlement to ensure the vitality of the community is sustained or enhanced. However, notwithstanding the above, the PSLP proposes to direct no housing growth to Hutton. This contrasts sharply with the proposed approach to the other settlements identified as Category 1 - Main Towns. It is also notable that a considerable amount of growth is being directed to settlements below Hutton within the settlement hierarchy. The PSLP fails to support the sustainable growth of Hutton. The proposal to direct none of the Borough's housing need to Hutton is unjustified, and inconsistent with national policy. To ensure the Local Plan is sound, paragraph 2.10 and the associated Table should be amended to ensure that Hutton delivers a scale of growth appropriate to its position within the hierarchy as a Category 1 Settlement. the Council's evidence base supports the view that the site is suitable and achievable for development, as confirmed through the assessment of the Site within the Brentwood Borough Council Housing and Economic Land Availability Assessment (October 2018) (HEELA). We would</p>	<p>The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.</p>	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>however disagree with the assessment of the Site's availability as a reason for the Site being discounted. The findings suggest that the Site is 'unavailable' due to a lack of active promotion from the landowner; the site has been promoted through previous consultations of the Local Plan review process at Call for Sites and Preferred Options. The site is therefore available for development.</p> <p><i>The proposals map should be modified to remove Site 033 from the Green Belt and identified for the delivery of residential development.</i></p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23876 - Ms. Isobel McGeever [7286]	Object	<p><b>SITE CHANGE</b></p> <p>The land adjoining Brentwood Community Hospital to the east benefits from a draft allocation in the Local Plan consultation document. Although this site has similar characteristics to the Brentwood community Hospital site, including being previous NHS site, it is not designated as Green Belt. The allocation on site 186, Land at Crescent Drive, Shenfield, identifies that the 1.54ha site can provide for around 55 dwellings, anticipated to be delivered between 2021/22 and 2023/24. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements.</p> <p><i>Should any part of the Brentwood Community Hospital site be declared as surplus to the operational healthcare requirement of the NHS in the future, then the site should be considered suitable and available for alternative use, and considered deliverable within the period 5-10 years. These representations identify the sites potential for future development, in accordance with the realignment of the Green Belt so that this significant area of development land is no longer included. It is evident, that the site does not make a positive contribution towards the purposes of the Green Belt set out in the NPPF. Accordingly, redevelopment of the site could provide a key contribution to Brentwood's housing need, which the Council have failed to justify, given the reliance on key strategic sites, and the lack of acknowledgement for unmet need arising from neighbouring authorities (Basildon and Havering). These representations therefore promote and identify parts of the Brentwood Community Hospital site as a suitable site to contribute towards these requirements. This site presents an excellent opportunity for a high quality residential redevelopment on previously developed Green Belt land. This could be achieved without compromising the character of the area as the development can act as an infill site to the existing residential development surrounding it, and without the need for significant infrastructure. Furthermore, the site is also available to accommodate further health related development should the CCG seek to expand their services in this location, including the possible expansion of the hospital to provide more comprehensive services for the community. However,</i></p>	The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>the site's Green Belt designation would make it difficult for any planning application proposing additional built form to provide further healthcare services to be considered acceptable. The subject site is considered available, suitable and deliverable within the 5-10 year period of the plan.</i>		
24163 - Clearview Residential & Lardpam Ltd [8369]	Object	<p><b>SITE CHANGE</b></p> <p>Despite being discounted, Clearview &amp; Lardpam remain committed to the site's development for a high-quality residential-led scheme capable of supporting:</p> <ul style="list-style-type: none"> <li>+ Enhanced green spaces for sport and recreation with improved connections to surrounding infrastructure;</li> <li>+ Approximately 750 new and deliverable homes (including 35% affordable) to meet demonstrable needs;</li> <li>+ Integration of the existing office building for BT and/or other businesses; and</li> <li>+ An element of local needs retail and leisure facilities to serve both new and existing communities.</li> </ul> <p>St. Faith's provides a strategic development opportunity within the Crossrail/A12 corridor that should be identified to support sustainable economic growth.</p> <p><i>St. Faith's site to be released from the Green Belt and allocated for residential-led development in this Local Plan.</i></p> <p><i>Given the likely need for additional housing to support sustainable economic growth in the sub-region, coupled with the historically constrained nature of Brentwood due to the Green Belt, it is considered "necessary" to identify sufficient "safeguarded land" to meet longer-term development needs and ensure that Green Belt boundaries will not need to be altered at the end of the plan period as per NPPF2.</i></p>	The majority of the site is proposed to be designated as a Local Wildlife Site due to the important habitat that the site contains. It was therefore not deemed suitable for allocation as a development site for housing.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22932 - Mrs Shirley Slade-Bennett [8240] 23564 - Mrs Hayley Hammond [8329] 24386 - Mr John Fowles [8373] 24453 - Mrs Vicky Mumby [8378] 26067 - Mr. Keith Creffield [8001] 26312 - Ms Jean Bury [8716]	Object	Strongly object to the inclusion of R25 and R26 in Blackmore. Housing allocations here are inappropriate	Noted	No further action
<i>Remove R25 and R26 from the plan</i>				
24185 - Doddinghurst Parish Council (Parish Clerk) [374]	Object	With no significant development within Doddinghurst, the Parish Council wish to make know their concerns should their be any changes to the Plan. Doddinghurst village is a self-contained community with a clear identity and well-defined boundaries to its built up area. The Parish Council wish to express its view that the maintenance of both of these are paramount and would not wish to see any development that would be inconsistent with present nature of the village or that would extend or blur the boundary to current built up area. Particularly because: There is no main road access to the village. Apart form the A128, All other access routes to the village are little more than winding country lanes of limited capacity, particularly for larger vehicles. Access for any proposed development, ad-hoc or otherwise , must be directly onto one of the larger through roads within the village. There is limited public transport to the village. The doctors surgery is already finding it difficult to cope with present demand. The public utilities, particularly water and gas, are regularly under repair and it is understood that the sewerage	Noted	No further action
<i>No changes proposed but consider a response might be necessary if sites or policies change in the future draft of the plan</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24160 - Mr Mr J Nicholls and Mr A Biglin (Land owners) [8368]	Object	<p>SITE CHANGE</p> <p>Site 183 is already serviced by water, sewerage and electricity. Residents of the site would have opportunities to make sustainable journeys. The unnamed road outside the site frontage is classified as a Public Bridleway; accommodating pedestrians, cyclists and horse riders. This provides a pleasant walking route between the site and village of Ingrave. There are also a number of Public Footpaths in the vicinity of the site which provide access to nearby towns and villages such as Brentwood, Shenfield and Billericay which offer a wider range of local amenities. The nearest school and Shenfield station are in walking distance.</p> <p><i>In light of the higher housing numbers required, the Plan should be revised to re-assess all sites which do not meet the distance thresholds from existing settlements, and to take into account opportunities offered by smaller sites in the Green Belt, which could offer sustainable transport modes, and make a small but important contribution to meeting housing need.</i></p>	The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.	No further action
23789 - RS2 Properties Ltd [8339]	Object	<p>SITE CHANGE</p> <p>Land at 41 Shenfield Road, despite being in the Green Belt, is an appropriate site for residential development and should be allocated for between 21-46 dwellings. Site lies within Settlement Category 1, in a sustainable location, within walking distance of Brentwood Town Centre, Brentwood Rail Station, Brentwood Community Hospital and Brentwood School. Green Belt Study Part 3 considers that the site makes a 'moderate' contribution towards the Green Belt. A number of sites within the Green Belt which the Green Belt Study confirms as making a 'moderate' contribution to the Green Belt, similar to 41 Shenfield Road, have been allocated.</p> <p><i>The Local Plan should allocate Land at 41 Shenfield Road for 24 dwellings</i></p>	The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22535 - Holmes & Hills LLP (Mr Michael Harman) [8074]	Object	<p>Detailed objection to spatial strategy that puts forward objection to R25 and R26 in Blackmore.</p> <p>In summary: 6.1. Brentwood Borough Council has failed to demonstrate that the required housing need cannot be met on existing previously developed land/sites in existing urban areas or by increasing densities on proposed allocated sites.</p> <p>6.2. Without prejudice to the above contention, if no such sites exist, that Brentwood Borough Council has failed to demonstrate there are no or insufficient previously developed sites available outside the existing urban areas.</p> <p>6.3. In any event, there are greenfield sites available (for example adjoining existing urban areas) in preferable and more sustainable locations.</p> <p>6.4. Moreover, R25 and R26 are inherently unsuitable developments because of (1) inadequate access, (2) flooding, (3) it will result in disproportionate increase in the housing stock, and, (4) the development would not be sustainable.</p> <p><i>removal of R25 and R26 from the plan</i></p>	<p>A sequential approach has been taken to the selection of sites whereby Brownfield land has been prioritised, however, the Council has assessed that it cannot meet its overall housing needs without releasing Green Belt land. There is a requirement in the NPPF to have a flexible supply of locations for new development to meet housing need (NPPF paragraph 68). This includes sufficient homes for the initial five years supply as well as sites of various sizes so they can brought forward for development. The Council does not want to rely too heavily on one site to meet the borough's development needs.</p>	No further action
24171 - Turn2us [6753]	Object	<p><b>SITE CHANGE</b></p> <p>A considerable amount of technical work demonstrate that land at Rayleigh Road is sustainable, suitable, available and achievable site to help meet the Borough's housing need. Notably, the Council's evidence base supports the view that the Site is suitable, available and achievable for development. The SA commentary states that is heavily constrained in heritage terms; however no details are provided to explain in what way there fore the SA does not provide a justified reason for the rejection of the Site.</p> <p><i>The rejection of Site 219 is unjustified, and overlooks an opportunity to correct other soundness deficiencies in respect of the Local Plan, including in relation to the overall quantum of housing proposed and the lack of support for any growth of Hutton. The allocation of Site 219 for development will assist in curing defects in respect of the Local Plan, enabling it to be a sound plan.</i></p>	<p>The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23637 - Tesco [5252]	Object	<p>SITE CHANGE</p> <p>Hopefield site should be released from the Green Belt for housing as it provides: significant community benefit by securing the future of Hopefield Animal Sanctuary; A great legacy; High quality and attractive new residential scheme within landscaped setting to meet local needs; Significantly improved accessibility and connectivity; Limited impact on highways; Highways proposals are supported by Essex County Council; Suitable and sustainable location; Developable; Bring direct and indirect economic benefits to Brentwood town and the wider area; Proposals respect Brentwood's character and identity; No/limited impact on the overall role and function of the Green Belt and landscape.</p> <p><i>Identify the Hopefield Site as a Housing Allocation in the new Local Plan as part of the revised and sound development strategy. This is required to address the above matters especially in relation to delivering the growth strategy and meeting five year housing land supply.</i></p>	The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.	No further action
24106 - Marden Homes Ltd [8363]	Object	<p>SITE CHANGE</p> <p>The rejection of Site 284 land adjacent to 7 Hanging Hill Lane was unjustified. Site is sustainable and deliverable and would help meet housing need. Development of the site would not impact on the function of the Green belt as it is immediately adjacent to Hutton, a 'main town' with the facilities and services that could support sustainable growth in Brentwood. Development here would also accord with the Brentwood Borough Council Spatial Strategy. The accompanying studies evidence the deliverability, achievability and suitability of the site. Any impact on historical sites and settings, landscapes, ecology and ecological designations could be mitigated.</p> <p><i>[Summary: Add site 284, land adj 7 Hanging Hill Lane to the local plan].</i></p>	The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23694 - Catesby Estates Plc. [7463]	Object	<p><b>SITE CHANGE</b></p> <p>Site 146 should be allocated for older people housing. Site is located adjacent to Ingrave's existing settlement boundary, in a sustainable location, served by regular buses and numerous services and facilities. The HELAA 2018 found it to be suitable, available and achievable and able to deliver housing within the first five years of the plan period. Although the revised Green Belt assessment found the site to have a moderate/high contribution towards Green Belt, it does not represent open countryside, its development would not entail encroachment into the countryside. Other benefits include parking and extended school playground for the nearby school.</p> <p><i>Land at Hillcrest Nurseries should be allocated to deliver retirement housing to meet the needs of older people and allow them to stay in their local community in housing suited to their needs, with the further benefit of releasing typically family housing back into the housing market.</i></p>	The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.	No further action
24062 - Countryside Properties [250]	Object	<p><b>SITE CHANGE</b></p> <p>The rejection of site 030A land at Bayleys Mead is unjustified. Site measures approximately 2.36 hectares, with a net developable area of 1.66 hectares, able to provide an estimated 30 dwellings. The site is situated within the Green Belt. Development of the site is supported by a wealth of technical evidence that confirms its suitability, including in relation to the lack of harm of its development to the purposes of the Green Belt. As a minimum, site 030A should be safeguarded for future Green Belt release as and when a need may arise given its highly sustainable location and suitability.</p> <p><i>[Summary: Add Bayleys Mead to the local plan].</i></p>	The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23386 - BJ Associates [8317]	Object	<p><b>SITE CHANGE</b></p> <p>The Roman Road, Mountnessing site is available for development, free from constraints and there is a clear commitment to provide affordable housing and/or specialist housing for older people on this site. The site is not of high landscape value and any development would be distant from heritage assets in the area and public parks. The only point against the option is its location in the policy defined Green Belt.</p> <p><i>Allocation of the Roman Road Site for Housing and or Specialist accommodation for older people</i></p>	The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.	No further action
23685 - M Scott Properties Ltd [8054]	Object	<p><b>SITE CHANGE</b></p> <p>Site 073 at Mountnessing should be allocated. The village of Mountnessing falls within the settlement classification 3 which is identified as being able to accommodate urban extensions, therefore Mountnessing should be considered a sustainable location to assist in the delivery of the spatial strategy. Site has accessibility to infrastructure and surrounding settlements; its location next to the A12 represents potentials to maximise opportunities around existing transport infrastructure and networks and to support the 'Transit-orientated Growth' strategy.</p> <p><i>Site 073 at Mountnessing should be allocated.</i></p>	The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23653 - EA Strategic Land LLP [279]	Object	<p>SITE CHANGE</p> <p>Plan is not consistent with the NPPF, which is clear that where the plan-maker has identified that exceptional circumstances exist to release land from the Green Belt the 'first consideration' should be given to land which is 'previously developed and/or well-served by public transport'. The Plan itself seeks 'transport orientated growth' yet remains steadfast against allocating site west of Thorndon Avenue, which meets NPPF requirements: it is self-contained with strong defensible boundaries, enclosed by existing industrial and residential development and roads.</p> <p><i>Site West of Thorndon Avenue, West Horndon is fully in accordance with the spatial strategy focused on transit orientated growth and should be allocated. No significant constraints with developing an urban extension at West Horndon, in addition to Dunton Hills Garden Village was identified by the Sustainability Appraisal. If Brentwood is to attempt to meet the housing needs, this approach is required.</i></p>	<p>The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.</p>	No further action
23689 - Clearbrook Group Plc [2930]	Object	<p>SITE CHANGE</p> <p>Site 146 should be allocated for older people housing. Site is located adjacent to Ingrave's existing settlement boundary, in a sustainable location, served by regular buses and numerous services and facilities. The HELAA 2018 found it to be suitable, available and achievable and able to deliver housing within the first five years of the plan period. Although the revised Green Belt assessment found the site to have a moderate/high contribution towards Green Belt, it does not represent open countryside, its development would not entail encroachment into the countryside. Other benefits include parking and extended school playground for the nearby school.</p> <p><i>Land at Hillcrest Nurseries should be allocated to deliver retirement housing to meet the needs of older people and allow them to stay in their local community in housing suited to their needs, with the further benefit of releasing typically family housing back into the housing market.</i></p>	<p>back into the housing market.</p> <p>The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23706 - BPM Investments Ltd [8338]	Object	<p><b>SITE CHANGE</b></p> <p>Site 067a and 067b land at Salmonds Grove should be allocated to: provide for more homes which would assist with meeting the persistent undersupply of housing in Brentwood, and to ensure the sustainable growth of Ingrave, a Category 3 settlement. Site makes a Low contribution to the Green Belt purposes, and it could be developed in the manner proposed without compromising the objectives of the wider Green Belt. The Council's own evidence base states that the site is suitable, available and achievable for development. The reasons given for the rejection of the site are spurious and based on erroneous conclusions.</p> <p><i>Site of less importance to the Green Belt, such as Salmonds Grove should be allocated.</i></p>	The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.	No further action
23874 - Brentwood School [2575]	Object	<p><b>SITE CHANGE</b></p> <p>Brentwood School has consistently raised the point that it has future need to provide for a specialist form of housing, i.e. for teachers' accommodation and also to land that is previously developed land within the School grounds and all which provides no useful educational function. Land around Mill Hill House and Millman Lodge is a unique piece of Green Belt which no longer fulfills a Green Belt function but only that of open urban space. It is important to a major education provider and raises no other issues in relation to any other part of the Local Plan.</p> <p><i>The written text of the Plan could provide for specialist housing for School purposes/key worker accommodation. Publish Policies and Proposals Map and release land around Mill Hill House and Millman Lodge from the Green Belt.</i></p>	The Council considers that this part of the Green Belt still forms an important role in separating and defining Brentwood and Shenfield. There are no proposals for the Green Belt to be removed in this area.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23661 - EA Strategic Land LLP [279]	Object	<p><b>SITE CHANGE</b> The Green Belt Study; the Sustainability Appraisal; the Landscape Sensitivity and Capacity Study and the Housing and Economic Land Availability Assessment all support the allocation of the land West of Thorndon Avenue, West Horndon for housing. The Council's own landscape assessment considers due to the characteristics of the subject site, that it should be prioritised for housing development. There is no technical evidence accompanying the Plan which identifies any fundamental constraints in bringing this site forward.</p> <p><i>Site West of Thorndon Avenue, West Horndon is fully in accordance with the spatial strategy focused on transit orientated growth and should be allocated. No significant constraints with developing an urban extension at West Horndon, in addition to Dunton Hills Garden Village was identified by the Sustainability Appraisal. If Brentwood is to attempt to meet the housing needs, this approach is required.</i></p>	The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.	No further action
23828 - Strutt & Parker LLP (Mr Alasdair Sherry) [6713]	Object	<p><b>SITE CHANGE</b> Site ref: 078 was rejected and considered unjustified. The allocation of land south of the B1002, Ingatestone, for residential development would represent a sustainable and deliverable proposal to help meet housing needs over the coming plan period.</p> <p><i>To ensure the Local Plan is sound, further suitable sites within Ingatestone should be allocated to ensure the sustainable growth, including Site 078.</i></p>	The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.	No further action
23180 - Chelmsford City Council (Ms Gemma Nicholson) [8305]	Support	<p>Sites of local in proximity to the Chelmsford area are around 161 dwellings (R21) and around 57 dwellings (R22) to be provided on new Local Plan allocations in Ingatestone, together with around 40 dwellings (R25) and around 30 dwellings (R26) allocated on sites in Blackmore. CCC supports BBC's proposed approach to housing and employment allocations which are unlikely to have any obvious adverse cross-boundary impacts on Chelmsford.</p> <p><i>No change proposed</i></p>	Noted	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24117 - Mr Terry Haynes [8359]	Support	<p><b>SITE CHANGE</b></p> <p>According to the Councils Green Belt evidence identifies the Hook End site as serving a moderate contribution to the green belt purposes. A number of other sites within the Local Plan were recorded as moderate and were designated as housing allocations. Our assessment of the sites green belt function concludes that 1. the site is well contained by existing built development and mature trees. Development would be seen as a logical extension to the physical extent of the village and would have a very limited encroachment into the countryside; 2. countryside separation would be retained; 3. The site has no specific countryside function and would utilise a well-contained parcel of land surrounded by residential development; 4. The site has no physical relationship with any historic town. Therefore, Hook End is suitable for development.</p> <p><i>We would request that the Local Plan be modified to allocate land south of Hook End Road for appropriate new residential development in line with the prevailing character and density of neighbouring residential areas.</i></p>	<p>The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24116 - Mr Terry Haynes [8359]	Support	<p><b>SITE CHANGE</b></p> <p>Given the Local Plan does not adhere to the housing requirements (does not use the 2014 housing figures for calculating housing need using the standard methodology), Brentwood will require additional housing allocations to be consistent with national policy. Therefore, land south of Hook End Road should be allocated for residential development. Appendix 1 of the Local Plan sets out the Council's anticipated Housing Trajectory, which we do not fully agree with. The Council's calculations of when sites will be delivered, and how many dwellings will be delivered each year, appears ambitious. In particular, Dunton Hills Garden Village is identified as being capable of delivering 2,700 dwellings during the plan period, with the site being capable of delivering 100 dwellings starting from 2022/23 (i.e. within 3 years), and then between 150 - 300 dwellings each year thereafter. This level of growth from such a strategic allocation does not appear realistic and no evidence has been put forward to date to support this forecast. The Local Plan does not comply with paragraphs 59 and 68 of the NPPF (which indicate that local authorities should boost significantly housing supply). We would therefore request that the Local Authority reviews its housing supply, and particularly its approach to small sites, and allocate suitable smaller sites which can be brought forward early in the plan period.</p> <p><i>It is considered that additional sites should be allocated to ensure that the Local Authority can meet its housing requirement to 2033. Even if the Inspector agrees with the Council's objectively assessed need, it is likely that additional sites will be required to be brought forward given the Council's overly optimistic approach to its housing trajectory, particularly with regards to Dunton Hills Garden Village. Furthermore, the Local Plan does not allocate a sufficient number of 'small sites' to contribute towards the housing requirement, as per paragraph 68 of NPPF3. It is considered that land south of Hook End Road, Hook End, Brentwood, Essex, CM15 0HA is an appropriate site for residential development and should be allocated for appropriate new residential development.</i></p>	<p>The Council has developed a spatial strategy over multiple iterations of the Local Plan and considers the proposed allocations to be the most appropriate to meet this. The selection of sites has been subject to thorough assessment and also consideration of reasonable alternatives in the accompanying Sustainability Appraisal. The Plan as proposed will meet Local Housing Need and using a stepped trajectory meet five year housing supply.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY R06: LAND OFF NAGS HEAD LANE</i></b>				
22571 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Object	<p>Policy wording lacks a commitment to deliver a net gain in biodiversity.</p> <p><i>Amend to: c. provision for "multifunctional" public open space "to deliver a measurable net gain in biodiversity"; and</i></p>	Noted. No changes proposed to site policy but will update Policy NE01 in line with NPPF requirements for securing net gains for biodiversity.	No further action
23214 - Thames Water (On behalf of Thames Water) [1927]	Support	<p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.</p> <p><i>Liaison with Thames Water and developer recommended</i></p>	Policy NE06 Flood Risk sets out under part E that where sewerage capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development.	No further action
23899 - Crest Nicholson Eastern [2509]	Support	<p>Support the principle of the proposed allocation of land at Nags Head Lane under Policy R06 but object to the allocation's indicative dwelling capacity. Site is strategically well-placed, suitable, available and deliverable, its allocation for residential development is justified and consistent with national policy. However, the indicative dwelling capacity of 125 dwellings would be unnecessarily restrictive of the deliverable quantum of development and is therefore ineffective. This underplays the deliverable quantum of development the site could accommodate. The accompanying Design Development Framework articulates how approximately 150 dwellings could be delivered on the Site in a generously landscaped scheme.</p> <p><i>Having taken the above design-led approach and determined that a quantum of development of approximately 150 dwellings is entirely achievable, the emerging Plan allocation and Policy R06 should reflect this in order to ensure best use of land and maximise the development potential.</i></p>	The 580 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher than the dwelling numbers indicated provided it is in conformity with other policies in the plan.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23256 - Mid and South Essex STP (Kerry Harding) [3791]	Support	Anticipated mitigation as a result of development on sites R04&05, R06, R08, R09, R10 should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs. Collaboration agreement, secure Wi-Fi and clinical system installation and maintenance will be required as part of mitigation within Care Homes.  <i>Contribution proposed</i>	The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.	No further action
23284 - Wood (on behalf of National Grid) (Ms Lucy Bartley) [8094]	Support	The site is crossed or in close proximity to a gas transmission asset: FM18. Please see enclosed plan referenced GT112. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect its assets.  <i>Direct communication with National Grid on site plan and strategies required regarding gas transmission asset.</i>	The Council will continue to work with utility providers in ensuring that as proposals advance they do not infringe on designated assets. This is in line with Policy NE07 Contaminated Land and Hazardous Substances.	No further action
<i>9.115</i>				
22216 - Mr Robin Ibrahim [5538]	Object	With flawed and missing evidence, in particular transport impact, more education and health infrastructure is needed, site location unsuitable.  <i>Remove site R19 from plan</i>	Through gathering evidence in support of the Local Plan we have not identified infrastructure issues that would prevent delivery of this number of homes. See Infrastructure Delivery Plan.	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.116</b>				
22454 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified. 3. Effective. 4. Consistent with National Policy. Request replacement of paragraph 9.116 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Replace paragraph 9.116 with the following wording: The site falls partially within the Brentwood 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 flood risk mitigation measures outlined in the Essex SuDS guide.</i></p>	Existing wording for paragraph 9.116 is still considered appropriate to meet the aims of what is being described.	No further action
22217 - Mr Robin Ibrahim [5538]	Object	<p>With flawed and missing evidence, in particular transport impact, more education and health infrastructure is needed, site location unsuitable.</p> <p><i>Remove site from the plan</i></p>	Through gathering evidence in support of the Local Plan we have not identified infrastructure issues that would prevent delivery of this number of homes. See Infrastructure Delivery Plan.	No further action
<b>POLICY R07: SOW AND GROW NURSERY</b>				
23827 - Sow & Grow Nursery (Mr. Derek Armiger) [303] 23851 - Ms Maxine Armiger [4656]	Object	<p>With the suggested minor amendments, and the noting of the ownership position, then Policy R07 and Allocated Site Plan and other references to the site in the Local Plan Submission Copy can be fully supported. Without such amendments the Policy is still supported but it is considered, given the land ownership position, that this would better clarify the Policy, and therefore the implementation of the Plan.</p> <p><i>Minor amendments in relation to land ownership.</i></p>	Disagree that the allocation should be split on the basis of landownership as the whole site comprises the allocation to which the requirements of Policy R07 would apply.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23704 - Ms Heather Dunbar [8337]	Object	<p>It is understood that Policy BE21 will only apply to garden land not forming part of an allocated site for development. If it is considered by the Examiner that as drafted BE21 is not clear, then it is requested that there is a clarification by way of an explanatory paragraph to exclude the application of Policy BE21 to parts of sites in garden land use, such as identified in Policy R07. Likewise para. 5.174 refers to the NPPF 2018 and the exclusion of gardens from the definition of previously developed land. However Annex 2 Glossary to the NPPF 2018 states with regard to previously developed land, land that is excluded includes:</p> <p>"land in built-up areas such as residential gardens, parks .. ". As land in site R07 includes residential garden land to the Bungalow and dwelling at Sow N Grow Nursery, and also to the adjoining 346 Ongar Road, which is currently outside the development/settlement boundary and in the countryside/green belt, it will be previously developed land. When it is brought into the settlement boundary and out of the green belt upon adoption there may be a need to clarify the application of this explanatory paragraph which forms part of the emerging Local Plan; as referred to above.</p> <p><i>Clarify policy BE21 with regard to Site R07.</i></p>	Once adopted the site would be designated as a housing allocation which is clear that it is intended for redevelopment. There would need to be consideration of the requirements for open space when designing new development proposals.	No further action
23709 - Ms Heather Dunbar [8337] 23820 - Sow & Grow Nursery (Mr. Derek Armiger) [303] 23841 - Sow & Grow Nursery (Ms Kim Armiger) [4657] 23858 - Ms Maxine Armiger [4656]	Object	<p>Density proposed for R07 is too low, the words "at least" should replace "around" in this policy. It conflicts with policy HB03B which states densities should be at least 35 dwellings per hectare.</p> <p>Changes to Plan:</p> <p><i>Amend policy to maximise opportunities for site R07</i></p>	The 38 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher than the dwelling numbers indicated provided it is in conformity with other policies in the plan.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23703 - Ms Heather Dunbar [8337]	Object	Land in the R07 Sow and Grown nursery site is partly owned by Mrs Dunbar and should be developed separately to provide homes more quickly. This area is considered to be previously developed land, with para 234 confirming this is brownfield land. More homes could be built on R07, especially with the smaller area being developed more quickly. The separate land ownership needs to be respected in policy development to facilitate this. Policies BE18 and BE20 which seek to protect and improve Green and Blue infrastructure should ensure that the trackway to the allotments is maintained.  <i>Separate out the sub area of R07 to speed up delivery.</i>	Disagree that the allocation should be split on the basis of landownership as the whole site comprises the allocation to which the requirements of Policy R07 would apply. The Policy would not preclude a development coming forwards that was higher than the dwelling numbers indicated provided it is in conformity with other policies in the plan.	No further action
23814 - Sow & Grow Nursery (Mr. Derek Armiger) [303] 23848 - Sow & Grow Nursery (Ms Kim Armiger) [4657] 23864 - Ms Maxine Armiger [4656]	Support	It is important that the Local Plan delivers the housing needed over the Plan period in a sustainable manner by the selection of appropriate sites for development well served by public transport, by way of smaller sites, especially within and next to urban neighbourhoods, and comprising previously developed land. Pilgrims Hatch has been appropriately defined as such a neighbourhood in the Settlement Hierarchy. This is supported. Where there is previously developed land, this should be allocated for development as a priority, even if within the green belt; especially where located next to urban neighbourhoods where local services and public transport are available. The Sow N Grow site is just such a site and accordingly, the green belt boundaries can be amended accordingly, reflecting the exceptional circumstances prevailing. The approach is sound and effective, and this is also supported.  <i>No change proposed</i>	Noted	No further action
23701 - Ms Heather Dunbar [8337]	Support	The identification and allocation of the Sow N Grow Nursery Site and the land adjoining at 346 Ongar Road is a good example of positive and proactive planmaking reflecting the status and priority of the land as previously developed land where it can be sustainably redeveloped. The exceptional circumstances that direct that the Green Belt Boundary should be amended have been recognised by the Local Planning Authority and are supported.  <i>No change proposed</i>	Noted	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23696 - Ms Heather Dunbar [8337] 23697 - Ms Heather Dunbar [8337]	Support	<p>Support site proposal as the owner of land which forms part of the proposed site, confirms that is willing to bring that part of the sites defined in the plan within her ownership forward for development separately in within the first five years of the development plan period. With access separate from main part of site, could be built out by small builder. The land allocated in the Sow N Grow Site owned by Mrs Dunbar comprises part of the garden to Rose Cottage. Note that the allotment access track is not owned by Armitage or Dunbar. Propose change to Green Belt boundary to facilitate this.</p> <p>It is important that the Local Plan delivers the housing needed over the Plan period in a sustainable manner by the selection of appropriate sites for development well served by public transport, by way of smaller sites, especially within and next to urban neighbourhoods, and comprising previously developed land. Pilgrims Hatch has been appropriately defined as such a neighbourhood in the Settlement Hierarchy. This is supported. Where there is previously developed land, this should be allocated for development as a priority, even if within the green belt; especially where located next to urban neighbourhoods where local services and public transport are available. The Sow N Grow site is just such a site and accordingly, the green belt boundaries can be amended accordingly, reflecting the exceptional circumstances prevailing. The approach is sound and effective, and this is also supported.</p> <p><i>Minor amendment to Green Belt boundary to include this area</i></p> <p><i>Representation at Examination: Appearance at the Examination</i></p> <p><i>Reason for appearance: Wish to appear at the Examination in due course as the Plan may be challenged by others.</i></p>	Disagree that the allocation should be split on the basis of landownership as the whole site comprises the allocation to which the requirements of Policy R07 would apply	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26471 - Mrs Shirley Fraser [5679]	Support	<p>The selection of this site for Pilgrims Hatch is an example of a soundly prepared Plan that will be effective, legally compliant and in accordance with the NPPF 2018. It will be good for Pilgrims Hatch by improving the appearance of the local area and delivering much needed housing early in the plan period.</p> <p><i>I am not seeking any modifications. I understand some small modifications are being suggested by the site owners, which I support, if the Inspector agrees they are needed.</i></p>	Noted	No further action
23815 - Sow & Grow Nursery (Mr. Derek Armiger) [303] 23847 - Sow & Grow Nursery (Ms Kim Armiger) [4657] 23863 - Ms Maxine Armiger [4656]	Support	<p>The identification and allocation of the Sow N Grow Nursery Site and the land adjoining at 346 Ongar Road is a good example of positive and proactive planmaking reflecting the status and priority of the land as previously developed land where it can be sustainably redeveloped. The exceptional circumstances that direct that the Green Belt Boundary should be amended have been recognised by the Local Planning Authority and are supported.</p> <p><i>No change proposed</i></p>	Noted	No further action
23816 - Sow & Grow Nursery (Mr. Derek Armiger) [303] 23846 - Sow & Grow Nursery (Ms Kim Armiger) [4657] 23862 - Ms Maxine Armiger [4656]	Support	<p>Land in the R07 Sow and Grown nursery site is partly owned by Mrs Dunbar and should be developed separately to provide homes more quickly. This area is considered to be previously developed land, with para 234 confirming this is brownfield land. More homes could be built on R07, especially with the smaller area being developed more quickly. The separate land ownership needs to be respected in policy development to facilitate this. Policies BE18 and BE20 which seek to protect and improve Green and Blue infrastructure should ensure that the trackway to the allotments is maintained.</p> <p><i>Propose separate development requirements for the different land ownership.</i></p>	Disagree that the allocation should be split on the basis of landownership as the whole site comprises the allocation to which the requirements of Policy R07 would apply.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23813 - Sow & Grow Nursery (Mr. Derek Armiger) [303] 23849 - Sow & Grow Nursery (Ms Kim Armiger) [4657] 23865 - Ms Maxine Armiger [4656]	Support	Support site proposal as the owner of land which forms part of the proposed site, confirms that is willing to bring that part of the sites defined in the plan within her ownership forward for development separately in within the first five years of the development plan period. With access separate from main part of site, could be built out by small builder. The land allocated in the Sow N Grow Site owned by Mrs Dunbar comprises part of the garden to Rose Cottage. Note that the allotment access track is not owned by Armitage or Dunbar. Propose change to Green Belt boundary to facilitate this.  <i>Clarification of policy with regard to two owners</i>	Disagree that the allocation should be split on the basis of landownership as the whole site comprises the allocation to which the requirements of Policy R07 would apply.	No further action
23834 - Sow & Grow Nursery (Ms Kim Armiger) [4657]	Support	Other larger housing site allocations are likewise not objected to, provided that there is no significant additional dwelling allocations added to them, either by way of additional land, or by way of significant additional density and dwelling provision, to the larger allocated sites.  <i>No change proposed</i>	It is expected that all allocations make maximum and efficient use of land in delivering housing needs whilst also ensuring other policy aims are met.	No further action
23716 - Ms Heather Dunbar [8337]	Support	With the suggested minor amendments, and the noting of the ownership position, then Policy R07 and Allocated Site Plan and other references to the site in the Local Plan Submission Copy can be fully supported. Without such amendments the Policy is still supported but it is considered, given the land ownership position, that this would better clarify the Policy, and therefore the implementation of the Plan.  <i>Changes proposed as per other representations. Ownership of site is of more than one person.</i>	Disagree that the allocation should be split on the basis of landownership as the whole site comprises the allocation to which the requirements of Policy R07 would apply. The Policy would not preclude a development coming forwards that was higher than the dwelling numbers indicated provided it is in conformity with other policies in the plan.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25842 - Mr Jack Nicholls [8579] 26404 - Mr Stephen J Bancroft [8026] 26405 - Miss Christine Green [8580] 26406 - Mr Peter Overy [8581] 26468 - Mrs Gemma Harvey [8582] 26469 - Mr Zak Harvey [5877] 26470 - Mrs Rosa Dwyer [5891] 26472 - Mr Philip Porter [8583] 26473 - Mr David Dunbar [8584] 26474 - Miss Sam Hayman [8585] 26475 - Mr Michael Fraser [8586] 26476 - Mrs Indira Brewerton [8587] 26477 - Mr Ian Sweetlove [8588] 26478 - Mr Mark McSweeney [8589] 26479 - Mrs Pauline Hewitt [7996] 26480 - Mr Leslie Kirk [8590] 26481 - Mr Jake Brewerton [8592] 26482 - Mr Brett Hewitt [8593] 26483 - Mr Alan Sullivan [8017] 26484 - Mrs Deborah Overy [8594] 26485 - Mr Daniel Gray [8595] 26486 - Ms Rasa Fergyse [8596] 26487 - Mrs Magaret Gurton [7993] 26488 - Mrs Barbara Wooders [8009]	Support	<p>The selection of this site for Pilgrims Hatch is an example of a soundly prepared Plan that will be effective, legally compliant and in accordance with the NPPF 2018. It will be good for Pilgrims Hatch by improving the appearance of the local area and delivering much needed housing early in the plan period.</p> <p><i>I am not seeking any modifications. I understand some small modifications are being suggested by the site owners, which I support, if the Inspector agrees they are needed.</i></p>	Noted	No further action
23215 - Thames Water (On behalf of Thames Water) [1927]	Support	<p>On the information available to date we do not envisage infrastructure concern regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p><i>No change proposed</i></p>	Policy NE06 Flood Risk sets out under part E that where sewerage capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.121</b>				
22455 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified. 3. Effective. 4. Consistent with National Policy. Request replacement of paragraph 9.121 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Replace paragraph 9.121 with the following wording. The site falls within the Pilgrims Hatch 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.</i></p>	Existing wording for paragraph 9.121 is still considered appropriate to meet the aims of what is being described.	No further action

**POLICY R08: LAND AT MASCALLS LANE**

23216 - Thames Water (On behalf of Thames Water) [1927]	Support	<p>On the information available to date we do not envisage infrastructure concern regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. We do not envisage network infrastructure concerns regarding wastewater infrastructure capability in relation to this site on a basis that it wont be any surface water connection into a public foul sewer system.</p> <p><i>Liaison with Thames Water and developer recommended.</i></p>	Policy NE06 Flood Risk sets out under part E that where sewerage capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development.	No further action
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23783 - Stonebond Properties Ltd [5948]	Support	<p>There is no constraint to development of this site that would withhold development. The site has previously been the subject of an application for 11 dwellings under reference 13/01351/OUT, which was refused and subsequently dismissed at appeal on matter of principle being located within the Green Belt. Site is in a highly sustainable location, suitable, available and achievable, makes a 'Low-Moderate' contribution to the Green Belt. Site can be delivered within two years of Local Plan adoption.</p> <p><i>No change proposed</i></p>	Noted	No further action
23784 - Stonebond Properties Ltd [5948]	Support	<p>Part C identifies the site is within a critical drainage area and this needs to be considered in respect of surface water flooding and may require an individually designed mitigation scheme. However, a report undertaken by our engineers (Appendix 4) illustrates that the site is not located within a Critical Drainage Area as confirmed by the Council's Strategic Flood Risk Assessment. However, a Drainage Impact Assessment (DIA) would be included with any future application to address this issue. Therefore, this aspect of the policy is incorrect but will nonetheless be satisfied by a DIA.</p> <p><i>The site is not located within a Critical Drainage Area as confirmed by the Council's Strategic Flood Risk Assessment.</i></p>	Noted	No further action
23257 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Anticipated mitigation as a result of development on sites R04&amp;05, R06, R08, R09, R10 should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs. Collaboration agreement, secure Wi-Fi and clinical system installation and maintenance will be required as part of mitigation within Care Homes.</p> <p><i>Contribution proposed</i></p>	The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.125</b>				
22456 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Justified. 3. Effective. 4. Consistent with National Policy.</p> <p>Request replacement of paragraphs 9.125, 9.130, 9.141, 9.145, 9.149, 9.153 &amp; 9.159 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Replace paragraphs 9.125, 9.130, 9.141, 9.145, 9.149, 9.153 &amp; 9.159 with the following wording:</i></p> <p><i>The site falls within the Brentwood 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.</i></p>	Existing wording for paragraphs 9.125 is still considered appropriate to meet the aims of what is being described.	No further action
<hr/>				
<b>POLICY R09: LAND OFF WARLEY HILL</b>				
23217 - Thames Water (On behalf of Thames Water) [1927]	Support	<p>On the information available to date we do not envisage infrastructure concern regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Drainage hierarchy to be followed in addressing surface water. As this is a brown field site, we expect significant reduction in surface water runoff.</p> <p><i>Liaison with developer and Thames Water recommended</i></p>	Policy NE06 Flood Risk sets out under part E that where sewerage capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development.	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23913 - Essex Partnership University NHS Foundation Trust [8344]	Support	<p>Fully support the allocation of Site R09 for residential development and EPUT is committed to the delivery of the site in accordance with policy R09. The site is sustainably located, previously developed, surplus to its former public sector requirements and is currently vacant, representing an excellent opportunity to deliver homes on brownfield land. The site's removal from the Green Belt is fully justified. Development of the site would contribute towards sustainable patterns of development and contribute towards the 5-year housing land supply. Site can deliver a high-quality development scheme incorporating substantial areas of landscaping and open space.</p> <p>Representation at Examination: Appearance at the Examination Reason for appearance: As my client owns the site subject to draft policy allocation R09, we consider that it would be beneficial for us to attend the oral part of the Examination to enable discussion of the points raised.</p> <p><i>No change proposed</i></p>	Noted	No further action
23258 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Anticipated mitigation as a result of development on sites R04&amp;05, R06, R08, R09, R10 should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs. Collaboration agreement, secure Wi-Fi and clinical system installation and maintenance will be required as part of mitigation within Care Homes.</p> <p><i>Contribution proposed</i></p>	The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.130</b>				
22457 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified. 3. Effective. 4. Consistent with National Policy. Request replacement of paragraphs 9.125, 9.130, 9.141, 9.145, 9.149, 9.153 &amp; 9.159 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Replace paragraphs 9.125, 9.130, 9.141, 9.145, 9.149, 9.153 &amp; 9.159 with the following wording: The site falls within the Brentwood 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.</i></p>	Existing wording for paragraphs 9.130 is still considered appropriate to meet the aims of what is being described.	No further action
<b>POLICY R10: BRENTWOOD RAILWAY STATION CAR PARK</b>				
22246 - Mr and Mrs Paul McEwen [4610]	Object	<p>Station car parking area should not be used as a housing development as a greater need to parking and encouragement to use public transport.</p> <p><i>Do not consider this area for housing.</i></p>	The Council recognises the need to maintain existing car parking levels across the wider Town Centre area which is set out in Policy R10. However, there also needs to be a balance whereby the use of the car is not actively encouraged and sustainable transport measures are maximised.	No further action
22464 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective. Criterion B. d. of Policy R10, Criterion B. g. of Policy R11, Criterion B. f. of Policy R13, and Criterion B. g. of Policy R14 seek to ensure that the current level of Town Centre public parking spaces is maintained. BCC should be satisfied that this can be achieved and does not conflict with other policies in the Local Plan, such as BE12 and BE13.</p> <p><i>BBC should be satisfied that this requirement can be achieved and does not conflict with the other policies in the Local Plan.</i></p>	Noted. The Council is not seeking to increase provision but maintain existing levels recognising the important role public car parking has to play in allowing people to visit the Town Centre.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24119 - Network Rail [1902]	Object	<p>R10 is a brownfield site, adjacent to Brentwood Rail Station, comprises surface level parking and light industrial unit. The R10 allocation doesn't include all of the car park. The attached map show area needed to bring forward comprehensive redevelopment - new homes, infrastructure of station and public benefits. The allocation for around 100 new homes is an ineffective use of land contrary to the NPPF. In this location a higher density can be accommodated. 150 new homes is feasible. Anticipated new homes can be delivered from 2024; policy should be amended to reflect this and the removal of the need for open space as the location is inappropriate.</p> <p><i>In the first instance we note that the site allocation plan at Appendix 2 of the draft Local Plan (page 327) doesn't include the full extent of the Station Car Park (i.e. Network Rail's ownership). Please find enclosed a red line plan showing the area that Solum is looking to bring forward for comprehensive redevelopment. Such an approach, rather than a piecemeal approach, will ensure that a well-designed development is delivered in this part of the town that maximises the ability of the site to deliver new homes, key pieces of station infrastructure as well as public benefits. As such, it is respectfully requested that the site allocation plan at Appendix 2 be amended to reflect the enclosed.</i></p> <p><i>Notwithstanding the above, we strongly support the proposed allocation of the site for residential development. The site is a key brownfield site in highly accessible and sustainable town centre location. Best of use of such a site should be made to relieve pressure on less suitable sites within the Borough to meet its needs.</i></p> <p><i>In the context of making effective use of land, the allocation accords with the guiding principles of the NPPF which states that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, as well promoting and supporting the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.</i></p> <p><i>In light of the above, the identified amount of</i></p>	<p>The 100 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher than the dwelling numbers indicated provided it is in conformity with other policies in the plan.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>development (i.e. 'around 100 new homes') represents an ineffective use of land which is contrary to the NPPF. Given the site's highly accessible and sustainable location, and given the context of the residential blocks to the immediate north of the site, it is considered that the site can accommodate a far greater density of residential dwellings. It is therefore respectfully requested that the wording of Policy R10 be amended to read 'provide for a minimum of 150 new homes...'.  In terms of delivery, we note that the supporting text to Policy R10 states that the new homes are anticipated to be delivered between 2029/30 and 2032/33. As mentioned above, Network Rail owns the freehold of the site and Solum has been tasked with pursuing proposals for its development. It is anticipated that new homes could come be delivered from 2024. It is therefore respectfully requested that the supporting text be amended to reflect this.  In terms of development principles, whilst we fully support the wider aspiration to increase public open space within the town, we question whether such provision is appropriate on this site. The site is relatively long and thin. As such, the provision of public open space has the potential to significantly limit the quantum of development which, as discussed above, would be contrary to making effective use of land in accordance with the NPPF. We therefore respectfully request that this development principle be removed from Policy R10.</p>		

## POLICY R10: BRENTWOOD RAILWAY STATION CAR PARK

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24147 - Wiggins Gee Homes Ltd [2788]	Object	<p>R10 station car park: many such car parks cannot cope with existing demand as passenger numbers rise. Further parking provision will be required during the plan period, with multi-storey as one option. The would affect both redevelopment options and the potential number of new dwellings, if any, the site could provide. Unless the Council can provide a clear commitment to redevelopment on behalf of the owners that would provide the 100 homes being asked for then it should be removed. The late delivery period is noted and suggest there is a strong degree of wishful thinking in proposing this land for residential allocation. The general point we are making here is that a number of the Pre-Submission Document's brownfield allocations have been under consideration for ten years or more. Some of them, like the town centre car parks, will be complicated to redevelop. We have emphasised throughout the Local Plan process that many of these sites were unlikely to make early contributions to meeting housing supply requirements, unlike our client's site at Pilgrims Hatch that is straightforward to develop and in a single, willing ownership. The problem remains, and supports our contention that the Plan needs more easier to develop sites, with an ownership ready to start. Our client's site at Pilgrims Hatch is more straightforward and ready to start.</p> <p><i>Removal of Allocation R20. This is a small site and should be categorised as a potential windfall site. At present, there appears to be no certainty about its availability.</i></p> <p><i>We also think that, without any direct evidence of intent on behalf of the landowner, Allocation R10 should also be removed.</i></p> <p><i>Policy R11 - the third sentence of related paragraph 9.137 should be re-worded, for the reasons outlined in our answer to Question 5 above, as follows:</i></p> <p><i>"The site will provide for around 45 homes, anticipated to be delivered between 2023/24 and 2024/25".</i></p> <p><i>Policy R13 - the third sentence of related paragraph 9.146 should be re-worded, for the reasons outlined in our answer to Question 5 above, as follows:</i></p> <p><i>"The site will provide for around 31 homes, anticipated to be delivered between 2023/24 and 2024/25".</i></p>	<p>Disagree that site R10 should be removed from the plan. The site is being actively promoted by Network Rail and Transport for London for development purposes is considered deliverable within the Plan period..The Council recognises the need to maintain existing car parking levels across the wider Town Centre area which is set out in Policy R10. However, there also needs to be a balance whereby the use of car is not actively encouraged and sustainable transport measures are maximised.</p>	No further action

## POLICY R10: BRENTWOOD RAILWAY STATION CAR PARK

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23219 - Thames Water (On behalf of Thames Water) [1927]	Support	<p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered is required. The detailed drainage strategy should be submitted with the planning application.</p> <p><i>Liaison with developer and Thames Water recommended</i></p>	Policy NE06 Flood Risk sets out under part E that where sewerage capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development.	No further action
23237 - TfL Commercial Development (Mr Luke Burroughs) [8312] 23238 - TfL Commercial Development (Mr Luke Burroughs) [8312]	Support	<p>TfL CD supports the principal of the allocating of Brentwood railway station car park as a strategic housing allocation. The site is a well contained underutilised brownfield site with excellent transport accessibility and should therefore be a focus for growth. The approximate capacity for 100 homes, equating to an indicative density of 104 dph is not in line with the Draft Brentwood Town Centre Design Guide which identifies that it can accommodate up to 405 units per hectare. The site is brownfield, in a town centre location and adjacent to a significant transport interchange. In addition, if development at this site will need to re-provide existing commuter car parking, it is also highly likely that higher density residential development would be required to fund the additional infrastructure associated with parking uses. Density on this site should therefore be optimised.</p> <p><i>High level feasibility studies for this site indicate that a decked design could allow a greater density to be achieved on the site whilst still providing a compatible and neighbourly form of development. Taking into account the town centre location and prevailing form of development, we consider that the site could support a higher density form of development than that suggested.</i></p>	The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.	No further action



<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23259 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Anticipated mitigation as a result of development on sites R04&amp;05, R06, R08, R09, R10 should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs. Collaboration agreement, secure Wi-Fi and clinical system installation and maintenance will be required as part of mitigation within Care Homes.</p> <p><i>Contribution proposed</i></p>	The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.	No further action
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<i><b>9.136</b></i>				
22469 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Justified. 3. Effective. 4. Consistent with National Policy. Request replacement of paragraph 9.136 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Replace paragraph 9.136 with the following wording:</i></p> <p><i>The site falls within the Brentwood 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.</i></p>	Existing wording for paragraphs 9.136 is still considered appropriate to meet the aims of what is being described.	No further action

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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*POLICY R11: WESTBURY ROAD CAR PARK*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24148 - Wiggins Gee Homes Ltd [2788]	Object	<p>R11 Westbury Road. Town centre car parks controlled by the council. R11, R13 and R14 provide nearly 600 or 45% of publicly available parking in the town centre. The caveat maintaining current parking levels is noted,</p> <p>This suggests a high degree of cooperation is needed to achieve this. All three sites have been under consideration since 2009. No applications have been received for R11 or R13 in the last 5 years. They are unlikely to deliver in 1-2 years as the plan suggests. Lead in time for R14 is longer but not proposals have been submitted in the last 5 years. The latest Five Year Housing Land Supply Statement is for 31 March 2018, published in November 2018. It demonstrates a 4.1 year supply. Around half of the supply required (820 dwellings) during the period 2018 to 2023 is to come from allocations set out in the Pre-Submission Document. We believe there is considerable doubt over R11, R13 and R20's ability to deliver during this period. The general point we are making here is that a number of the Pre-Submission Document's brownfield allocations have been under consideration for ten years or more. Some of them, like the town centre car parks, will be complicated to redevelop. We have emphasised throughout the Local Plan process that many of these sites were unlikely to make early contributions to meeting housing supply requirements, unlike our client's site at Pilgrims Hatch that is straightforward to develop and in a single, willing ownership. The problem remains, and supports our contention that the Plan needs more easier to develop sites, with an ownership ready to start. Our client's site at Pilgrims Hatch is more straightforward and ready to start.</p> <p><i>Removal of Allocation R20. This is a small site and should be categorised as a potential windfall site. At present, there appears to be no certainty about its availability.</i></p> <p><i>We also think that, without any direct evidence of intent on behalf of the landowner, Allocation R10 should also be removed.</i></p> <p><i>Policy R11 - the third sentence of related paragraph 9.137 should be re-worded, for the reasons outlined in our answer to Question 5 above, as follows:</i></p> <p><i>"The site will provide for around 45 homes, anticipated to be delivered between 2023/24 and 2024/25".</i></p>	<p>Disagree that site R11 should be removed from the plan. The site is owned by the Council and is being with development options being actively pursued through the Joint Venture work. It is considered deliverable within the Plan period. The Council recognises the need to maintain existing car parking levels across the wider Town Centre area which is set out in Policy R11. However, there also needs to be a balance whereby the use of car is not actively encouraged and sustainable transport measures are maximised.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p><i>Policy R13 - the third sentence of related paragraph 9.146 should be re-worded, for the reasons outlined in our answer to Question 5 above, as follows:</i></p> <p><i>"The site will provide for around 31 homes, anticipated to be delivered between 2023/24 and 2024/25".</i></p>		
22466 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective. Criterion B. d. of Policy R10, Criterion B. g. of Policy R11, Criterion B. f. of Policy R13, and Criterion B. g. of Policy R14 seek to ensure that the current level of Town Centre public parking spaces is maintained. BCC should be satisfied that this can be achieved and does not conflict with other policies in the Local Plan, such as BE12 and BE13.</p> <p><i>BBC should be satisfied that this requirement can be achieved and does not conflict with the other policies in the Local Plan.</i></p>	Noted. The Council is not seeking to increase provision but maintain existing levels recognising the important role public car parking has to play in allowing people to visit the Town Centre.	No further action
22248 - Mr and Mrs Paul McEwen [4610]	Object	<p>Car parks are not a viable site for housing development as Brentwood needs the vehicle parking spaces.</p> <p><i>Exclude this site for housing development</i></p>	The Council recognises the need to maintain existing car parking levels across the wider Town Centre area which is set out in Policy R10. However, there also needs to be a balance whereby the use of the car is not actively encouraged and sustainable transport measures are maximised.	No further action
23220 - Thames Water (On behalf of Thames Water) [1927]	Support	<p>On the information available to date we do not envisage infrastructure concern regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Drainage hierarchy to be followed in addressing surface water. As this is a brown field site, we expect significant reduction in surface water runoff.</p> <p><i>Liaison with developer and Thames water recommended</i></p>	Policy NE06 Flood Risk sets out under part E that where sewerage capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development.	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23260 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Anticipated mitigation as a result of development on sites R11, R12, R13, R14, R15, R18, R19 should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs. Collaboration agreement, secure Wi-Fi and clinical system installation and maintenance will be required as part of mitigation within Care Homes.</p> <p><i>Contribution required</i></p>	The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.	No further action
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<i><b>9.141</b></i>				
22458 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Justified. 3. Effective. 4. Consistent with National Policy. Request replacement of paragraphs 9.125, 9.130, 9.141, 9.145, 9.149, 9.153 &amp; 9.159 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Replace paragraphs 9.125, 9.130, 9.141, 9.145, 9.149, 9.153 &amp; 9.159 with the following wording:</i>  <i>The site falls within the Brentwood 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.</i></p>	Existing wording for paragraphs 9.141 is still considered appropriate to meet the aims of what is being described.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY R12: LAND AT HUNTER HOUSE</i></b>				
26508 - Wiggins Gee Homes Ltd [2788]	Object	<p>R12 is land at Hunter House, with anticipated delivery of 48 dwellings between 2024/25 and 2026/27. We assume the number of dwellings is based on the application submitted in 2017, and regarded by the Council as finally disposed by notice dated 10 January this year. Paragraph 9.142 referring to Allocation R12 states that the site will provide " a mix of size and type of homes including affordable in accordance with the Council's policy requirements." It would appear that the applicants' decision not to provide affordable housing in their proposed scheme was one of the main issues of contention. The general point we are making here is that a number of the Pre-Submission Document's brownfield allocations have been under consideration for ten years or more. Some of them, like the town centre car parks, will be complicated to redevelop. We have emphasised throughout the Local Plan process that many of these sites were unlikely to make early contributions to meeting housing supply requirements, unlike our client's site at Pilgrims Hatch that is straightforward to develop and in a single, willing ownership. The problem remains, and supports our contention that the Plan needs more easier to develop sites, with an</p> <p><i>Removal of Allocation R20. This is a small site and should be categorised as a potential windfall site. At present, there appears to be no certainty about its availability.</i></p> <p><i>R10 - We also think that, without any direct evidence of intent on behalf of the landowner, Allocation R10 should also be removed.</i></p> <p><i>Policy R11 - the third sentence of related paragraph 9.137 should be re-worded, for the reasons outlined in our answer to Question 5 above, as follows:</i></p> <p><i>"The site will provide for around 45 homes, anticipated to be delivered between 2023/24 and 2024/25"</i></p> <p><i>Policy R13 - the third sentence of related paragraph 9.146 should be re-worded, for the reasons outlined in our answer to Question 5 above, as follows:</i></p> <p><i>"The site will provide for around 31 homes, anticipated to be delivered between 2023/24 and 2024/25"</i></p>	<p>Disagree that site R12 should be removed from the plan. The site is being actively promoted by the site promoter and is considered deliverable within the Plan period. This site meets the Councils strategy as it is brownfield and within a highly sustainable location, the Town Centre.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22286 - Mr. Richard J Baker [2862]	Object	This policy proposes such a high density in an established residential area it is not taking account of its neighbours.	The 48 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher or lower than the dwelling numbers indicated provided it is in conformity with other policies in the plan.	No further action
<i>Reduce the density</i>				
25696 - MRS LESLEY LYNN [5591]	Object	I am writing to you to object to the density of housing Brentwood Council is proposing on the office site in Western Road which equates to something like 229 dwellings per Hectare, which is far the biggest of any of the proposed sites and can only possibly be achieved with high rise blocks of flats, which is inappropriate in a residential street of houses with a maximum height of two and a half stories. I understand that there other sites which also fall short of policy in the Local Development Plan to which I object. Development of this scale goes against Policy HP03.	The 48 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher or lower than the dwelling numbers indicated provided it is in conformity with other policies in the plan.	No further action
<i>Object to density proposed</i>				
25713 - Ms Norma Jennings [5444]	Object	I have previously objected to development at this site. There were as follows: More traffic debouching on to an already congested Western Road close to its inadequate junction with Weald Road. The design of the building did not blend with the appearance of the Edwardian /Victorian buildings. The plans showed that this block of appartments more resembled the high-rise. Although this might be a legal loophole, it appears unethical to me because I understand it will be subject to a different policy to that which affects a normal planning application. It suggests that the developer wants to avoid the more stringent measures involved in the latter such as the design of the building and the fact that, in such a restricted area, the only alternative would be to build upwards which would totally conflict with the entire tenor of other homes in the road.	Once the Local Plan is adopted any application would need to be in conformity with Policy HP16 Buildings Design and those in the Town Centre would also need to consider the Town Centre Design Guide to ensure that the site design is appropriate for the area it is situated within.	No further action
<i>Remove from the plan</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23221 - Thames Water (On behalf of Thames Water) [1927]	Support	<p>On the information available to date we do not envisage infrastructure concern regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Surface water to be addressed according to the Drainage hierarchy. As this is a brown field site, we expect significant reduction in surface water runoff.</p> <p><i>Liaison with developer and Thames Water recommended</i></p>	Policy NE06 Flood Risk sets out under part E that where sewerage capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development.	No further action
23261 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Anticipated mitigation as a result of development on sites R11, R12, R13, R14, R15, R18, R19 should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs. Collaboration agreement, secure Wi-Fi and clinical system installation and maintenance will be required as part of mitigation within Care Homes.</p> <p><i>Contribution required</i></p>	The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.	No further action
<i>9.142</i>				
22284 - Mr. Richard J Baker [2862]	Object	<p>This is inappropriate, excessively dense overbearing development in an established residential area of homes a maximum two and a half storeys high. This is not what the residents want. Previous requests to reduce the density and overbearing effect on local residents have been continually ignored in previous consultations; in fact the opposite has happened. Originally proposed was 22 dwellings, then 44 and now 48 dwellings on a 0.21Ha site which equates to some 229 dwellings per Ha. This can only be achieved by excessively high development leading to overlooking and an over bearing effect on the neighbours.</p> <p><i>The housing density proposed for this site should be drastically reduced so that an aesthetically pleasing suitable development of houses or even flats no higher than the surrounding dwellings can replace the existing offices.</i></p>	The 48 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher or lower than the dwelling numbers indicated provided it is in conformity with other policies in the plan. Any application would need to be in conformity with Policy HP16 Buildings Design and those in the Town Centre would also need to consider the Town Centre Design Guide to ensure that the site design is appropriate for the area it is situated within.	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.143</b>				
22285 - Mr. Richard J Baker [2862]	Object	<p>This road, despite what Essex County Council think, (as i am sure they haven't been down Western Road) is a busy road at most times and a proposal for a large underground car park to serve 48 dwellings is inappropriate and will cause additional congestion and danger to road users and pedestrians, particularly school children who use it to walk to the local schools.</p> <p><i>Reduce the proposed development size to something smaller and more appropriate and safer in the area.</i></p>	The Transport Assessment which accompanies the Local Plan has assessed the potential cumulative effects of proposed development on the road network and has set out required mitigation where appropriate.	No further action
<b>9.145</b>				
22459 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified. 3. Effective. 4. Consistent with National Policy. Request replacement of paragraphs 9.125, 9.130, 9.141, 9.145, 9.149, 9.153 &amp; 9.159 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Replace paragraphs 9.125, 9.130, 9.141, 9.145, 9.149, 9.153 &amp; 9.159 with the following wording:</i>  <i>The site falls within the Brentwood 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.</i></p>	Existing wording for paragraphs 9.145 is still considered appropriate to meet the aims of what is being described.	No further action
<b>POLICY R13: CHATHAM WAY CAR PARK</b>				
22467 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective. Criterion B. d. of Policy R10, Criterion B. g. of Policy R11, Criterion B. f. of Policy R13, and Criterion B. g. of Policy R14 seek to ensure that the current level of Town Centre public parking spaces is maintained. BCC should be satisfied that this can be achieved and does not conflict with other policies in the Local Plan, such as BE12 and BE13.</p> <p><i>BCC should be satisfied that this requirement can be achieved and does not conflict with the other policies in the Local Plan.</i></p>	Noted. The Council is not seeking to increase provision but maintain existing levels recognising the important role public car parking has to play in allowing people to visit the Town Centre.	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22249 - Mr and Mrs Paul McEwen [4610] 22613 - Gita Mackintosh [7214]	Object	Existing car parks are not acceptable as future housing developments It will bring heavy traffic to the town centre. Omitting a car park to replace with housing will make the area congested and limit vulnerable and older residents getting into town.  <i>Reduce number of homes planned for the site or leave car park as is. There will be a reduction in footfall to town centre which will have a negative impact on retail given the high street as a whole in the UK is in national decline.</i>	The Council recognises the need to maintain existing car parking levels across the wider Town Centre area which is set out in Policy R13. However, there also needs to be a balance whereby the use of the car is not actively encouraged and sustainable transport measures are maximised.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24149 - Wiggins Gee Homes Ltd [2788]	Object	<p>R13 Chatham Way. Town centre car parks controlled by the council. R11, R13 and R14 provide nearly 600 or 45% of publicly available parking in the town centre. The caveat maintaining current parking levels is noted,</p> <p>This suggests a high degree of cooperation is needed to achieve this. All three sites have been under consideration since 2009. No applications have been received for R11 or R13 in the last 5 years. They are unlikely to deliver in 1-2 years as the plan suggests. Lead in time for R14 is longer but not proposals have been submitted in the last 5 years. The latest Five Year Housing Land Supply Statement is for 31 March 2018, published in November 2018. It demonstrates a 4.1 year supply. Around half of the supply required (820 dwellings) during the period 2018 to 2023 is to come from allocations set out in the Pre-Submission Document. We believe there is considerable doubt over R11, R13 and R20's ability to deliver during this period. The general point we are making here is that a number of the Pre-Submission Document's brownfield allocations have been under consideration for ten years or more. Some of them, like the town centre car parks, will be complicated to redevelop. We have emphasised throughout the Local Plan process that many of these sites were unlikely to make early contributions to meeting housing supply requirements, unlike our client's site at Pilgrims Hatch that is straightforward to develop and in a single, willing ownership. The problem remains, and supports our contention that the Plan needs more easier to develop sites, with an ownership ready to start. Our client's site at Pilgrims Hatch is more straightforward and ready to start.</p> <p><i>Removal of Allocation R20. This is a small site and should be categorised as a potential windfall site. At present, there appears to be no certainty about its availability.</i></p> <p><i>We also think that, without any direct evidence of intent on behalf of the landowner, Allocation R10 should also be removed.</i></p> <p><i>Policy R11 - the third sentence of related paragraph 9.137 should be re-worded, for the reasons outlined in our answer to Question 5 above, as follows:</i></p> <p><i>"The site will provide for around 45 homes, anticipated to be delivered between 2023/24 and 2024/25".</i></p>	<p>Disagree that site R11 should be removed from the plan. The site is owned by the Council and is being with development options being actively pursued through the Joint Venture work. It is considered deliverable within the Plan period. The Council recognises the need to maintain existing car parking levels across the wider Town Centre area which is set out in Policy R11. However, there also needs to be a balance whereby the use of car is not actively encouraged and sustainable transport measures are maximised.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p><i>Policy R13 - the third sentence of related paragraph 9.146 should be re-worded, for the reasons outlined in our answer to Question 5 above, as follows:</i></p> <p><i>"The site will provide for around 31 homes, anticipated to be delivered between 2023/24 and 2024/25".</i></p>		
22518 - Mr David Marchant [7090]	Object	<p>Concerns over noise, traffic and lack of concern for current residents in the immediate vicinity.</p>	<p>Policy SP01 Sustainable Development Part D (e &amp; f) set out the requirement to ensure development does not cause unacceptable effect no health, the environment or amenity due to the release of pollutants such as noise. The Transport Assessment which accompanies the Local Plan has assessed the potential cumulative effects of proposed development on the road network and has set out required mitigation where appropriate.</p>	No further action
		<p><i>Restricting height of properties to 2 stories. Ensure no eating or drinking establishments are catered for on Crown Street or Regency Court.</i></p>		
23262 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Anticipated mitigation as a result of development on sites R11, R12, R13, R14, R15, R18, R19 should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs. Collaboration agreement, secure Wi-Fi and clinical system installation and maintenance will be required as part of mitigation within Care Homes.</p> <p><i>Contribution required</i></p>	<p>The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.</p>	No further action
23222 - Thames Water (On behalf of Thames Water) [1927]	Support	<p>On the information available to date we do not envisage infrastructure concern regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Drainage hierarchy to be followed in addressing surface water. As this is a brown field site, we expect significant reduction in surface water runoff.</p> <p><i>Developer and Thames Water liaison recommended</i></p>	<p>Policy NE06 Flood Risk sets out under part E that where sewerage capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.149</b>				
22461 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified. 3. Effective. 4. Consistent with National Policy. Request replacement of paragraphs 9.125, 9.130, 9.141, 9.145, 9.149, 9.153 &amp; 9.159 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Replace paragraphs 9.125, 9.130, 9.141, 9.145, 9.149, 9.153 &amp; 9.159 with the following wording:</i></p> <p><i>The site falls within the Brentwood 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.</i></p>	Existing wording for paragraphs 9.149 is still considered appropriate to meet the aims of what is being described.	No further action
<b>POLICY R14: WILLIAM HUNTER WAY CAR PARK</b>				
22468 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective. Criterion B. d. of Policy R10, Criterion B. g. of Policy R11, Criterion B. f. of Policy R13, and Criterion B. g. of Policy R14 seek to ensure that the current level of Town Centre public parking spaces is maintained. BCC should be satisfied that this can be achieved and does not conflict with other policies in the Local Plan, such as BE12 and BE13.</p> <p><i>BBC should be satisfied that this requirement can be achieved and does not conflict with the other policies in the Local Plan.</i></p>	Noted. The Council is not seeking to increase provision but maintain existing levels recognising the important role public car parking has to play in allowing people to visit the Town Centre.	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22599 - Cllr Philip Mynott [8283]	Object	There has been a history of trying to overdevelopment the William Hunter Way site on the part of the council. This is simply continuing, without having learned any lessons, in this plan.	The 300 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher or lower than the dwelling numbers indicated provided it is in conformity with other policies in the plan. Any application would need to be in conformity with Policy HP16 Buildings Design and those in the Town Centre would also need to consider the Town Centre Design Guide to ensure that the site design is appropriate for the area it is situated within.	No further action
		<i>Development on site R14 should be on a reasonable scale only.</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26509 - Wiggins Gee Homes Ltd [2788]	Object	<p>R14 . Town centre car parks controlled by the council. R11, R13 and R14 provide nearly 600 or 45% of publicly available parking in the town centre. The caveat maintaining current parking levels is noted, This suggests a high degree of cooperation is needed to achieve this. All three sites have been under consideration since 2009. No applications have been received for R11 or R13 in the last 5 years. They are unlikely to deliver in 1-2 years as the plan suggests. Lead in time for R14 is longer but not proposals have been submitted in the last 5 years. The general point we are making here is that a number of the Pre-Submission Document's brownfield allocations have been under consideration for ten years or more. Some of them, like the town centre car parks, will be complicated to redevelop. We have emphasised throughout the Local Plan process that many of these sites were unlikely to make early contributions to meeting housing supply requirements, unlike our client's site at Pilgrims Hatch that is straightforward to develop and in a single, willing ownership. The problem remains, and supports our contention that the Plan needs more easier to develop sites, with an ownership ready to start. Our client's site at Pilgrims Hatch is more straightforward and ready to start. The latest Five Year Housing Land Supply Statement is for 31 March 2018, published in November 2018. It demonstrates a 4.1 year supply. Around half of the supply required (820 dwellings) during the period 2018 to 2023 is to come from allocations set out in the Pre-Submission Document. We believe there is considerable doubt over R11, R13 and R20's ability to deliver during this period. The general point we are making here is that a number of the Pre-Submission Document's brownfield allocations have been under consideration for ten years or more. Some of them, like the town centre car parks, will be complicated to redevelop. We have emphasised throughout the Local Plan process that many of these sites were unlikely to make early contributions to meeting housing supply requirements, unlike our client's site at Pilgrims Hatch that is straightforward to develop and in a single, willing ownership. The problem remains, and supports our contention that the Plan needs more easier to develop sites, with an ownership ready to start.</p>	<p>Disagree that site R14 should be removed from the plan. The site is owned by the Council and is being with development options being actively pursued through the Joint Venture work. It is considered deliverable within the Plan period. The Council recognises the need to maintain existing car parking levels across the wider Town Centre area which is set out in Policy R11. However, there also needs to be a balance whereby the use of car is not actively encouraged and sustainable transport measures are maximised.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>Changes to Plan:</p> <p>Removal of Allocation R20. This is a small site and should be categorised as a potential windfall site. At present, there appears to be no certainty about its availability.</p> <p>R10 - We also think that, without any direct evidence of intent on behalf of the landowner, Allocation R10 should also be removed.</p> <p>Policy R11 - the third sentence of related paragraph 9.137 should be re-worded, for the reasons outlined in our answer to Question 5 above, as follows:  "The site will provide for around 45 homes, anticipated to be delivered between 2023/24 and 2024/25"</p> <p>Policy R13 - the third sentence of related paragraph 9.146 should be re-worded, for the reasons outlined in our answer to Question 5 above, as follows:  "The site will provide for around 31 homes, anticipated to be delivered between 2023/24 and 2024/25"</p> <p><i>Removal of Allocation R20. This is a small site and should be categorised as a potential windfall site. At present, there appears to be no certainty about its availability.</i></p> <p><i>R10 - We also think that, without any direct evidence of intent on behalf of the landowner, Allocation R10 should also be removed.</i></p> <p><i>Policy R11 - the third sentence of related paragraph 9.137 should be re-worded, for the reasons outlined in our answer to Question 5 above, as follows:  "The site will provide for around 45 homes, anticipated to be delivered between 2023/24 and 2024/25"</i></p> <p><i>Policy R13 - the third sentence of related paragraph 9.146 should be re-worded, for the reasons outlined in our answer to Question 5 above, as follows:  "The site will provide for around 31 homes, anticipated to be delivered between 2023/24 and 2024/25"</i></p>		



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22611 - Gita Mackintosh [7214] 22612 - Gita Mackintosh [7214]	Object	<p>Omitting a car park to replace with housing will make the area congested. Limit vulnerable and older residents getting into town. Surrounding houses are likely to be affected by light, congestion and rubbish. There will be a reduction in footfall to town centre which will have a negative impact on retail given the high street as a whole in the UK is in national decline. Reduce number of homes planned for the site or leave car park as is. This will make local plan more sound and justified.</p> <p><i>Reduce number of homes planned for the site or leave car park as is. This will make local plan more sound and justified.</i></p>	<p>The Council recognises the need to maintain existing car parking levels across the wider Town Centre area which is set out in Policy R13. However, there also needs to be a balance whereby the use of the car is not actively encouraged and sustainable transport measures are maximised. Policy SP01 Sustainable Development Part D (e &amp; f) set out the requirement to ensure development does not cause unacceptable effect no health, the environment or amenity due to the release of pollutants such as light and noise. The Transport Assessment which accompanies the Local Plan has assessed the potential cumulative effects of proposed development on the road network and has set out required mitigation where appropriate.</p>	No further action
23223 - Thames Water (On behalf of Thames Water) [1927]	Support	<p>The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to determine whether a detailed drainage strategy is required. The detailed drainage strategy should be submitted with the planning application. Drainage hierarchy to be followed in addressing surface water. As this is a brown field site, we expect significant reduction in surface water runoff.</p> <p><i>Liaison with Thames Water and developers recommended for a drainage strategy</i></p>	<p>Policy NE06 Flood Risk sets out under part E that where sewerage capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development.</p>	No further action
23263 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Anticipated mitigation as a result of development on sites R11, R12, R13, R14, R15, R18, R19 should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs. Collaboration agreement, secure Wi-Fi and clinical system installation and maintenance will be required as part of mitigation within Care Homes.</p> <p><i>Contribution required</i></p>	<p>The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.153</b>				
22462 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified. 3. Effective. 4. Consistent with National Policy. Request replacement of paragraphs 9.125, 9.130, 9.141, 9.145, 9.149, 9.153 &amp; 9.159 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Replace paragraphs 9.125, 9.130, 9.141, 9.145, 9.149, 9.153 &amp; 9.159 with the following wording:</i>  <i>The site falls within the Brentwood 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.</i></p>	Existing wording for paragraphs 9.153 is still considered appropriate to meet the aims of what is being described.	No further action
<b>POLICY R15: WATES WAY INDUSTRIAL ESTATE</b>				
22470 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Consistent with National Policy. Criterion A. b. of Policy R15 states 'provision for retail / commercial use'. As currently drafted this is open to interpretation. Policy PC03 which sets the employment land allocations for the Local Plan does not include this site as an allocation. The supporting text to Policy PC07 which sets out the Plans requirements for retail and commercial leisure growth, does not list this site as a location for such development. It is recommended that this criterion be deleted, in line with paragraph 16 d) of the NPPF.</p> <p><i>Delete criterion A. b. from Policy R15.</i></p>	This is a residential led mixed use scheme with the provision for retail/commercial use on the site. Therefore not considered appropriate to remove criterion.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26510 - Wiggins Gee Homes Ltd [2788]	Object	<p>Sites R 10-15, 20. The latest Five Year Housing Land Supply Statement is for 31 March 2018, published in November 2018. It demonstrates a 4.1 year supply. Around half of the supply required (820 dwellings) during the period 2018 to 2023 is to come from allocations set out in the Pre-Submission Document. We believe there is considerable doubt over R11, R13 and R20's ability to deliver during this period. The general point we are making here is that a number of the Pre-Submission Document's brownfield allocations have been under consideration for ten years or more. Some of them, like the town centre car parks, will be complicated to redevelop. We have emphasised throughout the Local Plan process that many of these sites were unlikely to make early contributions to meeting housing supply requirements, unlike our client's site at Pilgrims Hatch that is straightforward to develop and in a single, willing ownership. The problem remains, and supports our contention that the Plan needs more easier to develop sites, with an ownership ready to start.</p> <p><i>Removal of Allocation R20. This is a small site and should be categorised as a potential windfall site. At present, there appears to be no certainty about its availability. R10 - We also think that, without any direct evidence of intent on behalf of the landowner, Allocation R10 should also be removed.</i></p> <p><i>Policy R11 - the third sentence of related paragraph 9.137 should be re-worded, for the reasons outlined in our answer to Question 5 above, as follows:</i></p> <p><i>"The site will provide for around 45 homes, anticipated to be delivered between 2023/24 and 2024/25".</i></p> <p><i>Policy R13 - the third sentence of related paragraph 9.146 should be re-worded, for the reasons outlined in our answer to Question 5 above, as follows: "The site will provide for around 31 homes, anticipated to be delivered between 2023/24 and 2024/25"</i></p>	Disagree that site R15 should be removed from the plan. The site is being actively promoted by the site promoter and is considered deliverable within the Plan period. This site meets the Council's strategy as it is brownfield and within a highly sustainable location, the Town Centre.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24122 - Lidl UK GmbH [6726]	Object	<p>Lidl is the owner of site RO15. Lidl is concerned that the proposed home number for this site is too high. The significance of this for the decision-making process will depend on (i) the final content of the application; (ii) the interpretation of the word "around" in Policy R15 and (iii) the extent to which the housing strategy might in due course incorporate greater flexibility than in the Pre-Submission draft. Lidl will be promoting a foodstore of a scale that will promote an important objective of the Local Plan, by virtue of the delivery of new convenience floorspace on a preferred site allocated for retail use, in addition to housing. Reference to the 2014 retail study and objectively assessed housing need highlights differing demand. This site presents the only option to meet the retail need. Para 9.2 explains how site specific allocations should be read. Lidl is keen to contribute to the delivery of housing and retail development targets, however Lidl is concerned that the statement of "around 80 dwellings" may be read by some as a minimum. Therefore this needs clarification and the text be changed to up to 80 dwellings.</p> <p><i>The plan would be positively prepared if it stated support for a foodstore on Site R15 of a scale and type that could address the need identified in the evidence base.</i></p> <p><i>Lidl proposes also that Policy R15 be revised to explain that the eventual number of dwellings on the site will be determined having regard to the expectation that it will also accommodate a foodstore to meet a proportion of the retail need set out in Policy PC07, but that it is expected to be able to accommodate up to 80 units within Use Classes C2 or C3.</i></p>	<p>The 80 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher or lower than the dwelling numbers indicated provided it is in conformity with other policies in the plan. Any application would need to be in conformity with Policy HP16 Buildings Design and those in the Town Centre would also need to consider the Town Centre Design Guide to ensure that the site design is appropriate for the area it is situated within.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23224 - Thames Water (On behalf of Thames Water) [1927]	Support	On the information available to date we do not envisage infrastructure concern regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Drainage hierarchy to be followed in addressing surface water. As this is a brown field site, we expect significant reduction in surface water runoff.  <i>Development phasing with Thames Water recommended as an action</i>	Policy NE06 Flood Risk sets out under part E that where sewerage capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development.	No further action
23264 - Mid and South Essex STP (Kerry Harding) [3791]	Support	Anticipated mitigation as a result of development on sites R11, R12, R13, R14, R15, R18, R19 should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs. Collaboration agreement, secure Wi-Fi and clinical system installation and maintenance will be required as part of mitigation within Care Homes.  <i>Contribution required</i>	The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.	No further action
<i>9.159</i>				
22463 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	2. Justified. 3. Effective. 4. Consistent with National Policy. Request replacement of paragraphs 9.125, 9.130, 9.141, 9.145, 9.149, 9.153 & 9.159 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.  <i>Replace paragraphs 9.125, 9.130, 9.141, 9.145, 9.149, 9.153 &amp; 9.159 with the following wording: The site falls within the Brentwood 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.</i>	Existing wording for paragraphs 9.159 is still considered appropriate to meet the aims of what is being described.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Land off Doddinghurst Road, Pilgrims Hatch and Brentwood</i>				
22600 - Cllr Philip Mynott [8283]	Object	<p>The two sites R16 and R17 should have been assessed separately in the council's Green Belt assessment. R17 in particular has a whole list of reasons not to have been a selected site.</p> <p><i>R17 should be removed from the list of Housing sites proposed. Both R16 and R17 should be reassessed from the ground up, especially as far as the NPPF goes.</i></p>	Both parcels of land are considered well contained with defendable boundaries and therefore appropriate to allocated for housing and be removed from the Green Belt.	No further action
<i>POLICY R16 &amp; R17: LAND OFF DODDINGHURST ROAD</i>				
22614 - Gita Mackintosh [7214] 22615 - Gita Mackintosh [7214] 22616 - Gita Mackintosh [7214]	Object	<p>The plan appears unsound. It will still bring heavy traffic to the Doddinghurst Road on a network that is already under enormous pressure. Schools in the area are already oversubscribed and needs to be taken into account. Developing homes near the A12 boundary is unlikely to be an attractive proposition and careful consideration needs to be done if this development will be successful.</p> <p><i>Reduce the number of homes for the site</i></p>	Policy SP01 Sustainable Development Part D (e & f) set out the requirement to ensure development does not cause unacceptable effect no health, the environment or amenity due to the release of pollutants such as light and noise. The Transport Assessment which accompanies the Local Plan has assessed the potential cumulative effects of proposed development on the road network and has set out required mitigation where appropriate.	No further action
22572 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Object	<p>Policy wording lacks a commitment to deliver biodiversity net gain.</p> <p><i>Policy wording should be amended as follows: b. provision for "multifunctional" public open space to deliver a measurable net gain in biodiversity;</i></p>	Noted. No changes proposed to site policy but will update Policy NE01 in line with NPPF requirements for securing net gains for biodiversity.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26511 - Wiggins Gee Homes Ltd [2788]	Object	<p>R16 is weakly worded on the need for appropriate mitigating measures. It should state that any new development will provide effective measures along boundaries with the A12 and elsewhere. We note that the Policy also includes requirements for public open space and provision of pedestrian and cycling connections. Again, the Policy should insist on these provision and not simply ask potential developers to "consider" them.</p> <p>R17 is a narrow strip of land on the southern side of the A12. R16 is currently a relatively wooded area at around the same level as the A12. Any landscaping here would be confined by the narrowness of the site and ineffective as a barrier against air and noise pollution. This should be removed from the allocation and designated instead as open space.</p> <p>Effective noise and pollution barriers do not look aesthetically pleasing. Adequate space will be needed for landscaping to mitigate their visual impact. Better configured space and we agree that a degree of development here could be achieved in an acceptable environment, provided there are strong and effective measures to reduce air and noise pollution from the A12. Again, the land is on much the same level as the A12. Clearly, the further any development is located away from the A12 then the less the risk of pollution measures to mitigate.</p> <p>Effective noise and pollution barriers do not look aesthetically pleasing. Adequate space will be needed for landscaping to mitigate their visual impact. R03, R16, R17, R21, R22 allocations are all bounded by the A12 to a greater or lesser extent. As noted in our representations on Policy NE05, the Pre-Submission Document's paragraph 8.50 states that transport generated emissions are the prime source of air pollution in the Borough. We have consistently questioned the wisdom of locating new housing next to the A12 on the grounds of public health. All these proposed allocations, in whole or part, have significant issues resulting from their proximity to principal sources of air and noise pollution. There is conflict with the Pre-Submission Document's own policies on these issues, including Policy NE05. Consequently we are suggesting a number of modifications to the relevant policies.</p>	<p>Policy SP01 Sustainable Development Part D (e &amp; f) set out the requirement to ensure development does not cause unacceptable effect on health, the environment or amenity due to the release of pollutants such as light and noise. It is considered that the site will be able to provide adequate mitigation in conformity with this policy.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>We propose the following modifications for the reasons outlined in our response to the Local Plan consultation. Strengthen the wording of all policies to ensure that appropriate air and noise pollution measures form an integral part of any development proposals. Wherever there is reference to either the A12, or the mainline railway, the related criterion should read as follows:</p> <p>"appropriate measures, including barriers, embankments and landscaping, to reduce air and noise must be provided along the site's boundary(ies) with the A12 and/or the mainline railway."</p> <p>Removal of R17 from Policy R16 and R17.</p> <p>Removal from proposed allocation R03 of the elliptical shaped piece of land between the A1023 Chelmsford Road and the A12 Marylands Interchange, and the area to the north of the site bounded by the Marylands Interchange to the north, the railway line to the south-east, a part of Arnold's Wood to the south-west and Chelmsford Road to the north-west.</p> <p>Removal of Allocation R21 on grounds of poor physical environment, isolation from the main settlement of Ingatestone and coalescence with the village of Mounthnessing. Removal of Allocation R22 on grounds of poor physical environment.</p>		
23440 - Mr Gary Williams [7267]	Object	<p>Object to planning 200 houses on bishops Hall back viking way. This is green belt has badgers and fox's on also rare birds sky larks which are protected since 1981 they nest on there they will have no where to nest.</p> <p><i>Remove sites from the plan</i></p>	Any application would be expected to conform to Policy NE01 Protecting and Enhancing the Natural Environment. There would need to be appropriate assessments of any potential ecology on site.	No further action
23267 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Anticipated mitigation as a result of development on sites R16 &amp; R17 should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs.</p> <p><i>Contribution requirement</i></p>	The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24081 - Countryside Properties [250]	Support	<p>Support subject to amendments to policy wording. Site is achievable, deliverable, achievable within the first five years of the plan period. Housing number: A significant amount of feasibility work has been undertaken to confirm that the site can provide at least 250 homes. The 200-unit figure in Policy R16&amp;17 has far less rationale and technical justification and may lessen the ability of this site. Access: the current wording allows for access from Doddinghurst Road only, this could have viability implications of housing delivery. We request that the policy retains flexibility for the use of the other accesses.</p> <p><i>Amend wording in Policy R16&amp;17 with regards to(1) unit number (2) access, so that the policy retains flexibility for the use of the other accesses from Karen Close and Russell Close as a worst case scenario, in the interests of protecting the deliverability of the southern parcel of the site, particularly as these routes of access have been previously agreed with Essex County Council Highways.</i></p> <p><i>Amend wordings in relation to the timing of the delivery in Appendix 1 and paragraph 9.160.</i></p>	The 200 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher or lower than the dwelling numbers indicated provided it is in conformity with other policies in the plan.	No further action
23225 - Thames Water (On behalf of Thames Water) [1927]	Support	<p>On the information available to date we do not envisage infrastructure concern regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing.</p> <p><i>No change proposed</i></p>	Policy NE06 Flood Risk sets out under part E that where sewerage capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>9.160</i>				
22617 - Gita Mackintosh [7214]	Object	<p>Careful consideration needs to be done if this development will be successful.</p> <p><i>Careful consideration needs to be done if this development will be successful.</i></p> <p><i>Changes to Plan:</i>  <i>Reduce number of homes planned for the site to ensure enough boundary is in place between greenery and A12. Retain some of the countryside features so that the character of Brentwood and surrounding area is retained.</i></p>	<p>The 200 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher or lower than the dwelling numbers indicated provided it is in conformity with other policies in the plan.</p>	No further action
<i>9.164</i>				
22473 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified. 3. Effective. 4. Consistent with National Policy. Request replacement of paragraph 9.164 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Replace paragraph 9.164 with the following wording:</i>  <i>The site falls within the Pilgrims Hatch 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.</i></p>	<p>Existing wording for paragraphs 9.164 is still considered appropriate to meet the aims of what is being described.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Land off Crescent Drive, Shenfield</i>				
22344 - Mr Richard Owers [8114]	Object	<p>We support the creation of new homes on the site providing the ecology of the site is protected and that a site specific master plan is developed with engagement with the local community throughout the development process.</p> <p><i>Protect ecology and develop a site specific masterplan with community engagement.</i></p>	Any application would be expected to conform to Policy NE01 Protecting and Enhancing the Natural Environment. There would need to be appropriate assessments of any potential ecology on site.	No further action
<i>POLICY R18: LAND OFF CRESCENT DRIVE</i>				
22574 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Object	<p>Policy wording lacks a commitment to deliver biodiversity net gain.</p> <p><i>Policy wording should be amended as follows: b. provision for "multifunctional" public open space to deliver a measurable net gain in biodiversity;</i></p>	Noted. No changes proposed to site policy but will update Policy NE01 in line with NPPF requirements for securing net gains for biodiversity.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26114 - Philip Cunliffe-Jones [1406]	Object	<p>3. I have prepared a historical note with supporting documents, listed at the end of the note, and this note is an appendix to this reply to Question 5. It will be seen that there is a need to restore the private road which has been encroached upon, and paragraph 98 of the NPPF should be pursued to allow public use of Glanthams Road along its full width. This would allow a footpath and cycle path and vehicles to use it to enable the woodland open space to be brought into positive use as a local public amenity. Glanthams Road could remain a private Road connecting to Worrin Road with a footpath/cycle path created by order under the Highways Act 1980 Section 26. Generally, once an easement or right of way has arisen it will continue indefinitely unless it is extinguished or released. Failure to use a right of way is not of itself sufficient to allow abandonment to be inferred: in the case of <i>Benn-v-Hardinqe</i> (1992) 60 P&amp;CR 246 the Court of Appeal held that the failure to use the right for 175 years was not enough on its own to indicate an intention to abandon.</p> <p><i>1. Development Principle Aa -Amount and type of development</i> Delete" around 55" and substitute "up to BO, depending on the amount of on-site private open space and onsite land take for vehicular movement via Glanthams Road" Reasons: (a) The site is well served by Public Transport, and adjoins the Community Hospital. Paragraphs 122-123 NPPF support a significant uplift in the average density.</p> <p><i>(b) The draft policy proposes on-site open space and main vehicular access from Crescent Road. These are wasteful of the immediate infrastructure which should be restored, allowing more efficient and sustainable use of the site, the adjoining road infrastructure and the adjoining woodland open space of over nine acres.</i></p> <p><i>2. Development principle Ba. and Paragraph 9.166 should be deleted. Principle Ba should read: The main vehicular access will be via the private road Glanthams Road which will be restored to its condition and width on the Appointed Day {1 July 1948}. Paragraph 9.166 should read: The site abuts the</i></p>	<p>The 55 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher or lower than the dwelling numbers indicated provided it is in conformity with other policies in the plan. Disagree that Glanthams Road would constitute a reasonable vehicular access for the site. Potential access to adjoining woodland owned by the Council is noted, still expect the site to meet its requirements for open space provision.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p><i>Private Road Glanthams Road. Reason: It is not an effective use of land to abandon this right of way and estate road</i></p> <p><i>3. Development principle b - provision of on-site public open space - should be deleted. This should be replaced by the following:</i></p> <p><i>b. Prior to construction of residential units a scheme for restoration of the Woodland Open space to the South west shall be implemented by the clearance of dead wood and timber in conjunction with the local planning authority, with provision of direct access from the site to the woodland and footpaths.</i></p> <p><i>The last 14 words in the first sentence of paragraph 9.169 should be deleted</i></p> <p><i>Reasons for deletion: As set out in paragraph 21 of the attached historical and legal note, the opportunity should, and I suggest must, be grasped firmly in the redevelopment of Policy area R18 to restore the woodland open space as a local amenity to benefit the public as well all as future residents of the proposed redevelopment site. The last 14 words of paragraph 9.169 will be redundant if the modification to Development principle b is accepted, as the design of such a scheme will take an integrated approach and enhance access from the development to the open space. The existing wording implies sensitive boundary segregation rather than improved functional access to 2.54</i></p>		
22343 - Dr Norman Randall [8246]	Object	<p>The houses are needed, but the density is far too high and the design of the homes should be similar to existing Crescent Drive properties in size, quality, parking capability and existing greenery.</p> <p><i>Reduce housing density</i></p>	<p>The 55 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher or lower than the dwelling numbers indicated provided it is in conformity with other policies in the plan. Any application would need to be in conformity with Policy HP16 Buildings Design and those in the Town Centre would also need to consider the Town Centre Design Guide to ensure that the site design is appropriate for the area it is situated within.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26116 - Philip Cunliffe-Jones [1406]	Object	<p>5. That position changes with the disposal of R18 policy site for residential development. The opportunity must now be taken to restore the private road and enforce the easements and covenants against obstructions to the passage along the unadopted part of Glanthams Road and also encroachments onto the open space at the rear of Glanthams Close, thereby enabling the woodland open space to be a public amenity in an area otherwise relatively deficient in open space. The developable area of the policy area R18 should be reviewed - there is little need for onsite public open space provision if the 9 and a half acres of woodland open space were restored and accessible.</p> <p><i>1. Development Principle Aa -Amount and type of development</i>  Delete" around 55" and substitute "up to BO, depending on the amount of on-site private open space and onsite land take for vehicular movement via Glanthams Road"</p> <p><i>Reasons: (a) The site is well served by Public Transport, and adjoins the Community Hospital. Paragraphs 122-123 NPPF support a significant uplift in the average density.</i></p> <p><i>(b) The draft policy proposes on-site open space and main vehicular access from Crescent Road. These are wasteful of the immediate infrastructure which should be restored, allowing more efficient and sustainable use of the site, the adjoining road infrastructure and the adjoining woodland open space of over nine acres.</i></p> <p><i>2. Development principle Ba. and Paragraph 9.166 should be deleted. Principle Ba should read: The main vehicular access will be via the private road Glanthams Road which will be restored to its condition and width on the Appointed Day {1 July 1948}. Paragraph 9.166 should read: The site abuts the Private Road Glanthams Road. Reason: It is not an effective use of land to abandon this right of way and estate road</i></p> <p><i>3. Development principle b - provision of on-site public open space - should be deleted. This should be replaced by the following:</i></p>	<p>The 55 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher or lower than the dwelling numbers indicated provided it is in conformity with other policies in the plan. Disagree that Glanthams Road would constitute a reasonable vehicular access for the site. Potential access to adjoining woodland owned by the Council is noted, still expect the site to meet its requirements for open space provision.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p><i>b. Prior to construction of residential units a scheme for restoration of the Woodland Open space to the South west shall be implemented by the clearance of dead wood and timber in conjunction with the local planning authority, with provision of direct access from the site to the woodland and footpaths.</i></p> <p><i>The last 14 words in the first sentence of paragraph 9.169 should be deleted</i></p> <p><i>Reasons for deletion: As set out in paragraph 21 of the attached historical and legal note, the opportunity should, and I suggest must, be grasped firmly in the redevelopment of Policy area R18 to restore the woodland open space as a local amenity to benefit the public as well all as future residents of the proposed redevelopment site. The last 14 words of paragraph 9.169 will be redundant if the modification to Development principle b is accepted, as the design of such a scheme will take an integrated approach and enhance access from the development to the open space. The existing wording implies sensitive boundary segregation rather than improved functional access to 2.54</i></p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26112 - Philip Cunliffe-Jones [1406]	Object	<p>1. (i) The site of the North Thames Regional Transfusion Centre, (Draft Policy R18 ) proposed for residential redevelopment is now in an area of relative deficiency of open space. This was not always so however, but during the period of statutory control by the NHS, land management of access to open space was sadly neglected. The annexed historical and legal note with supporting documents show that the title to the land has appurtenant rights which should be exercised in conjunction with the Council in order to enforce rights over estate roads to the woodland open space and thereby to give proper and sustainable effect to NPPF policies.</p> <p>(ii) Vehicular access should be taken only via private road section of Glanthams Road, restored to the full width legally available under the easement and estate covenants appurtenant to the freehold title. The legacy of Percy Alfred Bayman who planted trees and shrubs in the hospital grounds as well as gifting land should be respected and restored by enforcing the estate covenants appurtenant to the land title.</p> <p>(iii) The restrictive covenant referred to in paragraph 2 of this reply may be modified by the application to the Upper Tribunal Lands Chamber but it should be noted that while statutory powers have enabled covenants to be overridden, that protection will cease on sale. A more significant issue is the existence of a building scheme satisfying the criteria laid down by the Court of Appeal in Birdlip Limited -v- Hunter benefitting the site and also benefitting the Council owned open space. It seems the draft policy is predicated on a developer taking out indemnity insurance and packaging a residential development without reconnecting to the Glanthams Park estate road or facilitating access to the woodland open space. This would be inimical to the policies and purposes of the NPPF.</p> <p>(iv) The proposed policy R18 does not take an integrated approach to housing and open space facilities, does not protect or enhance rights of way or take into account the possibility of adding to high quality rights of way.</p> <p>(v) The developable area of the R18 site together with the need for on site open space should be reappraised along with the restoration of Glanthams Road, particularly as the site is within an area well</p>	<p>The 55 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher or lower than the dwelling numbers indicated provided it is in conformity with other policies in the plan. Disagree that Glanthams Road would constitute a reasonable vehicular access for the site. Potential access to adjoining woodland owned by the Council is noted, still expect the site to meet its requirements for open space provision.</p>	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>served by public transport and could have a significant uplift in the average density beyond what is already proposed.</p> <p>1. Development Principle Aa -Amount and type of development Delete" around 55" and substitute "up to B0, depending on the amount of on-site private open space and onsite land take for vehicular movement via Glanthams Road" Reasons: (a) The site is well served by Public Transport, and adjoins the Community Hospital. Paragraphs 122-123 NPPF support a significant uplift in the average density.</p> <p>(b) The draft policy proposes on-site open space and main vehicular access from Crescent Road. These are wasteful of the immediate infrastructure which should be restored, allowing more efficient and sustainable use of the site, the adjoining road infrastructure and the adjoining woodland open space of over nine acres.</p> <p>2. Development principle Ba. and Paragraph 9.166 should be deleted. Principle Ba should read: The main vehicular access will be via the private road Glanthams Road which will be restored to its condition and width on the Appointed Day {1 July 1948}. Paragraph 9.166 should read: The site abuts the Private Road Glanthams Road. Reason: It is not an effective use of land to abandon this right of way and estate road</p> <p>3. Development principle b - provision of on-site public open space - should be deleted. This should be replaced by the following: b. Prior to construction of residential units a scheme for restoration of the Woodland Open space to the South west shall be implemented by the clearance of dead wood and timber in conjunction with the local planning authority, with provision of direct access from the site to the woodland and footpaths.</p> <p>The last 14 words in the first sentence of paragraph 9.169 should be deleted Reasons for deletion: As set out in paragraph 21 of the attached historical and legal note, the opportunity</p>		

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		<p>should, and I suggest must, be grasped firmly in the redevelopment of Policy area R18 to restore the woodland open space as a local amenity to benefit the public as well all as future residents of the proposed redevelopment site. The last 14 words of paragraph 9.169 will be redundant if the modification to Development principle b is accepted, as the design of such a scheme will take an integrated approach and enhance access from the development to the open space. The existing wording implies sensitive boundary segregation rather than improved functional access to 2.54 hectares of woodland open space - a hugely valuable amenity if and when brought back into beneficial use.</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26117 - Philip Cunliffe-Jones [1406]	Object	<p>6. Policies in the NPPF require the approach and modifications I put forward to the draft plan to achieve these planning policy objectives in the public interest. Paragraph 21 of the attached historical and legal note and the reply to question 6 refer.</p> <p><i>1. Development Principle Aa -Amount and type of development</i>  <i>Delete" around 55" and substitute "up to BO, depending on the amount of on-site private open space and onsite land take for vehicular movement via Glanthams Road"</i>  <i>Reasons: (a) The site is well served by Public Transport, and adjoins the Community Hospital. Paragraphs 122-123 NPPF support a significant uplift in the average density.</i></p> <p><i>(b) The draft policy proposes on-site open space and main vehicular access from Crescent Road. These are wasteful of the immediate infrastructure which should be restored, allowing more efficient and sustainable use of the site, the adjoining road infrastructure and the adjoining woodland open space of over nine acres.</i></p> <p><i>2. Development principle Ba. and Paragraph 9.166 should be deleted. Principle Ba should read: The main vehicular access will be via the private road Glanthams Road which will be restored to its condition and width on the Appointed Day {1 July 1948}. Paragraph 9.166 should read: The site abuts the Private Road Glanthams Road. Reason: It is not an effective use of land to abandon this right of way and estate road</i></p> <p><i>3. Development principle b - provision of on-site public open space - should be deleted. This should be replaced by the following:</i>  <i>b. Prior to construction of residential units a scheme for restoration of the Woodland Open space to the South west shall be implemented by the clearance of</i></p>	<p>The 55 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher or lower than the dwelling numbers indicated provided it is in conformity with other policies in the plan. Disagree that Glanthams Road would constitute a reasonable vehicular access for the site. Potential access to adjoining woodland owned by the Council is noted, still expect the site to meet its requirements for open space provision.</p>	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
		<p>dead wood and timber in conjunction with the local planning authority, with provision of direct access from the site to the woodland and footpaths.</p> <p>The last 14 words in the first sentence of paragraph 9.169 should be deleted</p> <p>Reasons for deletion: As set out in paragraph 21 of the attached historical and legal note, the opportunity should, and I suggest must, be grasped firmly in the redevelopment of Policy area R18 to restore the woodland open space as a local amenity to benefit the public as well all as future residents of the proposed redevelopment site. The last 14 words of paragraph 9.169 will be redundant if the modification to Development principle b is accepted, as the design of such a scheme will take an integrated approach and enhance access from the development to the open space. The existing wording implies sensitive boundary segregation rather than improved functional access to 2.54</p>		

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26115 - Philip Cunliffe-Jones [1406]	Object	<p>4. The site within Policy R18 has a boundary with number 17 Crescent Road which derives from the right to purchase granted in the Transfer of 1931 to Francis John Bassett (the brown land in that Transfer) to connect Glanthams Road with Crescent Road. The site abuts Glanthams Road at its South East corner, where adverse possession has taken place extending the gardens over several plots at Worrin Close. The land transferred by Mr. Bayman had the benefit of covenants in a building scheme for Glanthams Park estate whereby plot owners covenanted not to obstruct the passage along any estate road and to contribute to the repair and maintenance of the footway and half the carriage way. Although neither Glanthams Road nor the open space woodland have been maintained since the 1920s, this has been due to the intervention of statutory authorities. So the private estate covenants were suspended.</p> <p><i>1. Development Principle Aa -Amount and type of development</i>  <i>Delete" around 55" and substitute "up to BO, depending on the amount of on-site private open space and on-site land take for vehicular movement via Glanthams Road"</i>  <i>Reasons: (a) The site is well served by Public Transport, and adjoins the Community Hospital. Paragraphs 122-123 NPPF support a significant uplift in the average density.</i></p> <p><i>(b) The draft policy proposes on-site open space and main vehicular access from Crescent Road. These are wasteful of the immediate infrastructure which should be restored, allowing more efficient and sustainable use of the site, the adjoining road infrastructure and the adjoining woodland open space of over nine acres.</i></p> <p><i>2. Development principle Ba. and Paragraph 9.166 should be deleted. Principle Ba should read: The main vehicular access will be via the private road Glanthams Road which will be restored to its condition and width on the Appointed Day {1 July 1948}. Paragraph 9.166 should read: The site abuts the Private Road Glanthams Road. Reason: It is not an effective use of land to abandon this right of way and estate road</i></p>	<p>The 55 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher or lower than the dwelling numbers indicated provided it is in conformity with other policies in the plan. Disagree that Glanthams Road would constitute a reasonable vehicular access for the site. Potential access to adjoining woodland owned by the Council is noted, still expect the site to meet its requirements for open space provision.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>3. Development principle b - provision of on-site public open space - should be deleted. This should be replaced by the following:</p> <p>b. Prior to construction of residential units a scheme for restoration of the Woodland Open space to the South west shall be implemented by the clearance of dead wood and timber in conjunction with the local planning authority, with provision of direct access from the site to the woodland and footpaths.</p> <p>The last 14 words in the first sentence of paragraph 9.169 should be deleted</p> <p>Reasons for deletion: As set out in paragraph 21 of the attached historical and legal note, the opportunity should, and I suggest must, be grasped firmly in the redevelopment of Policy area R18 to restore the woodland open space as a local amenity to benefit the public as well all as future residents of the proposed redevelopment site. The last 14 words of paragraph 9.169 will be redundant if the modification to Development principle b is accepted, as the design of such a scheme will take an integrated approach and enhance access from the development to the open space. The existing wording implies sensitive boundary segregation rather than improved functional access to 2.54</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26113 - Philip Cunliffe-Jones [1406]	Object	<p>Historical overview</p> <p>2. By the National Health Service Act 1946 local voluntary hospitals were brought into public ownership - the Act transferred to the Minister all hospitals with their endowments. Percy Alfred Bayman had transferred to the Trustees of a charity known as the Brentwood District Hospital land shown and coloured pink blue yellow green mauve and brown on the plan annexed to a transfer dated the 15th day of June 1931. The Transfer included the benefit of covenants on the part of the Minister of Transport contained in a conveyance dated the 1st day of March 1929 and made between the Minister of Transport and Mr. Bayman. The Trustees of the Charity covenanted to protect the neighbouring land being developed as a building estate and will not permit any building or wall on the land transferred other than the Hospital or any extension thereof including Nurses Homes Entrance Lodges or any buildings used in connection with the hospital.</p> <p><i>1. Development Principle Aa -Amount and type of development</i>  <i>Delete" around 55" and substitute "up to BO, depending on the amount of on-site private open space and onsite land take for vehicular movement via Glanthams Road"</i>  <i>Reasons: (a) The site is well served by Public Transport, and adjoins the Community Hospital. Paragraphs 122-123 NPPF support a significant uplift in the average density.</i></p> <p><i>(b) The draft policy proposes on-site open space and main vehicular access from Crescent Road. These are wasteful of the immediate infrastructure which should be restored, allowing more efficient and sustainable use of the site, the adjoining road infrastructure and the adjoining woodland open space of over nine acres.</i></p> <p><i>2. Development principle Ba. and Paragraph 9.166 should be deleted. Principle Ba should read: The main vehicular access will be via the private road Glanthams Road which will be restored to its condition and width on the Appointed Day {1 July 1948}. Paragraph 9.166 should read: The site abuts the Private Road Glanthams Road. Reason: It is not an</i></p>	<p>The 55 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher or lower than the dwelling numbers indicated provided it is in conformity with other policies in the plan. Disagree that Glanthams Road would constitute a reasonable vehicular access for the site. Potential access to adjoining woodland owned by the Council is noted, still expect the site to meet its requirements for open space provision.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>effective use of land to abandon this right of way and estate road</p> <p>3. Development principle b - provision of on-site public open space - should be deleted. This should be replaced by the following:</p> <p>b. Prior to construction of residential units a scheme for restoration of the Woodland Open space to the South west shall be implemented by the clearance of dead wood and timber in conjunction with the local planning authority, with provision of direct access from the site to the woodland and footpaths.</p> <p>The last 14 words in the first sentence of paragraph 9.169 should be deleted</p> <p>Reasons for deletion: As set out in paragraph 21 of the attached historical and legal note, the opportunity should, and I suggest must, be grasped firmly in the redevelopment of Policy area R18 to restore the woodland open space as a local amenity to benefit the public as well all as future residents of the proposed redevelopment site. The last 14 words of paragraph 9.169 will be redundant if the modification to Development principle b is accepted, as the design of such a scheme will take an integrated approach and enhance access from the development to the open space. The existing wording implies sensitive boundary segregation rather than improved functional access to 2.54 hectares of woodland open space - a hugely valuable amenity if and when brought back into beneficial use.</p>		
24120 - Fairview New Homes Ltd (Ms Faye Wilders) [8365]	Object	<p>Fairview supports the designation for housing, and having undertaken some design and massing work, considers that it can accommodate more than 55 units. However, for the basis of a policy designation, Fairview supports this policy and considers that this policy is sound. of a 1.5ha site, 1ha is developable.</p> <p>Removal of Policy R18: B Development Principles criterion b. provision for public open space.</p>	Noted	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24121 - Fairview New Homes Ltd (Ms Faye Wilders) [8365]	Object	<p>Fairview does not consider Development Principle B: provision for public open space to be sound. Site Constraints - The key constraints to developing the site comprise the site levels and large number of existing trees. The site slopes from north to south by 3 metres and north-west to south-east by 4 metres. As such there is a storey height difference between the front and back of the site and from each side. Paragraph 5.181 in reference to Policy BE22: Open Space in New Development, useable open space is defined as 2000m<sup>2</sup> in a single mass, giving people a space to be able to play. It is considered that given the substantial constraints relating to levels and tree coverage of the site, that creation of a public open space within the site is not a sound principle of development. Smaller pockets of amenity space that respond to the tree locations and ground levels would be a more appropriate development principle for this specific site.</p> <p><i>Remove criterion b. provision for public open space of Policy R18</i></p>	Any development would be expected to be in conformity with Policy BE22 Open Space in New Development.	No further action
23265 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Anticipated mitigation as a result of development on sites R11, R12, R13, R14, R15, R18, R19 should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs. Collaboration agreement, secure Wi-Fi and clinical system installation and maintenance will be required as part of mitigation within Care Homes.</p> <p><i>Contribution clarification requested</i></p>	The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.	No further action
23812 - Messers A, J and C Courage Owners of Eagle and Child Public House [8340]	Support	<p>Support for the proposed allocation of the site for residential development. It is located within the development boundary of Shenfield and comprises previously developed land. Site is sustainable having good public transport links, good connections with the local highway network, well supported by community facilities such as schools and healthcare providers, and local retail provision; site has a low probability of flooding; site is deliverable; new residential dwellings can be delivered within the first five years of the new Local Plan.</p> <p><i>No change proposed</i></p>	Noted	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22231 - Mr Ian Patterson [8223] 22338 - Mr Richard Owers [8114] 25697 - Mr G Burnham [8575]	Support	<p>In general support of this development but the following issues need to be considered: 1. scale of development in line with land available - matching existing homes to maintain character. 2. Front line properties kept inline with existing homes in Crescent Drive. 3. Keep parking restrictions in place to allow free flow traffic. Provide enough parking for development - 1 space for 1 bedroom and 2 for all units 2 or more bedrooms. 4. Access to development adjacent to Community Hospital. 5. Maintain the roadside current hedging to the boundary of the land, and replace any trees or shrubs that maybe affected with the development. 6) Include sufficient green spaces within development ( 25sqm per home ).</p> <p><i>1. scale of development in line with land available - matching existing homes to maintain character. 2. Front line properties kept inline with existing homes in Crescent Drive. 3. Keep parking restrictions in place to allow free flow traffic. Provide enough parking for development - 1 space for 1 bedroom and 2 for all units 2 or more bedrooms. 4. Access to development adjacent to Community Hospital. 5. Maintain the roadside current hedging to the boundary of the land, and replace any trees or shrubs that maybe affected with the development. 6) Include sufficient green spaces within development ( 25sqm per home ).</i></p>	<p>Noted. All applications would be expected to be in conformity with Policy SP01 Sustainable Development which requires consideration of surrounding character, satisfactory means of access and maintaining highway safety.</p>	No further action
<hr/>				
9.165				
22339 - Mr Richard Owers [8114]	Support	<p>We support the creation of new homes on the site but are very concerned that the proposal for 55 dwellings may be inappropriate and out of character for the area where all residential properties are well screened, substantial detached houses.</p> <p>A lower density development may be more appropriate. Sympathetic screening and maintenance of the verdant and leafy nature of the area is essential.</p> <p><i>Reduce housing numbers proposed for the site</i></p>	<p>Noted. All applications would be expected to be in conformity with Policy SP01 Sustainable Development which requires consideration of surrounding character in developing the proposals. The 55 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher or lower than the dwelling numbers indicated provided it is in conformity with other policies in the plan.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>9.166</i>				
22340 - Mr Richard Owers [8114]	Object	<p>We support the creation of new homes but the proposal of 55 new dwelling will create too much additional traffic at peak times when traffic queues all the back from the junction with Shenfield Road passed the site. The position of the exit from the site should avoid light pollution from turning vehicles for surrounding properties.</p> <p><i>Reduce housing numbers and position exit to avoid light pollution from turning vehicles for surrounding properties</i></p>	<p>Noted. All applications would be expected to be in conformity with Policy SP01 Sustainable Development which requires consideration of surrounding character, satisfactory means of access and maintaining highway safety. The Transport Assessment that accompanies the Local Plan did not identify any major issues on the road network that could not be adequately mitigated.</p>	No further action
<i>9.169</i>				
22342 - Mr Richard Owers [8114]	Support	<p>This condition is crucial for the success of this project for the local community. Hedges in front of the property are an important part of this condition as well as the existing trees and new planting.</p> <p><i>No change proposed</i></p>	Noted	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.170</b>				
22450 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified. 3. Effective. 4. Consistent with National Policy. Request amendment to second sentence of paragraph 9.105 and full paragraph of 9.170 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Replace second sentence of paragraph 9.105 and the full paragraph 9.170 with the following wording -</i></p> <p><i>The site falls within the Shenfield 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.</i></p>	Existing wording for paragraphs 9.164 is still considered appropriate to meet the aims of what is being described.	No further action
<b>Land at Priests Lane, Shenfield</b>				
22212 - Mr Robin Ibrahim [5538]	Object	<p>The evidence base is flawed: The transport Assessment is inaccurate as it has excluded traffic along Priests Lane, and was taken at times which excluded a large proportion of school traffic, despite Council assurances that a traffic assessment would be done for Priests Lane, and does not account for the increased usage of Priests Lane from the proposed development of 1000 houses in Shenfield travelling to the A127, nor does it account for the impact of the Elizabeth Line; fails to address safety of residents : the technical submissions residents that new road accesses along Priests Lane are hazardous have not been addressed, nor concerns that the road design is dangerous for increased traffic movements The Lane was never meant to be a main distributary road which it has now become. Residents have pointed out that as such it does not comply with the Essex Design Guide with respect to road and pavement width. Where is the mitigation?</p> <p><i>Remove site R19 Priests Lane from plan</i></p>	The Council's Local Plan Transport Assessment includes growth proposed from all site allocations as well as background growth planned in surrounding areas. The methodology has been developed through engagement from highways authorities (Essex County Council and Highways England). The assessment sets out the approach to transport modelling, modelling results and junction capacity assessments. It highlights the junctions that may require mitigation, sustainable measures proposed to support growth and the impact this has on junction assessments. The assessment prioritises the sustainable transport requirements of the Local Plan. This work has been undertaken in line with requirements. Mitigation is considered as part of the work and listed in the Council's Infrastructure Delivery Plan. Site accesses from Priests Lane will need to comply with highways authority standards, including safety.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY R19: LAND AT PRIESTS LANE</i></b>				
23930 - mr simon Fleming [7119] 23938 - Glenda Fleming [3779]	Object	Re policy B (d): The Endeavour School borders Site 044 as well as Site 178 (N.B. The R19 plan on page 335 of the Local Plan is incorrectly drawn). It is understood that the owners of site 044 are willing to provide land as necessary and so this should not be a restriction on Site 178.  <i>ADD Paragraph 9.176A: "Policy R19 relates to two adjoining sites, HELAA refs 044 (Land off Priests' Lane - former Ursuline Playing Fields, 4.5 Ha) and 178 (Land off Bishop Walk, 0.6 Ha). The large-site planning policies outlined above are only applicable to Site 044 and should not delay a smaller scale housing development on Site 178."</i>	The Council has highlighted the importance of site allocations in multiple ownerships coming forward through collaborative masterplanning to ensure delivery of quality policy compliant development that benefits both new and existing communities. The alternative could result in segregated development that bears no relationship with surrounding communities to their detriment. To this end, the Council published a Site Analysis Overview (February 2019) to accompany the Local Plan and set out these principles on sites where there are multiple ownerships. This supports the proposals of Policy R19. The Council is committed the continuation of joint working with landowners to achieve quality placemaking in new development.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22679 - Priests Lane Neighbourhood Residents Association (Mrs Cath Kenyon) [6046]	Object	<p>Council's consultation and decisions are inconsistent, and not evidence based. Several issues with the LDP and question the transparency and robustness of the process carried out by Brentwood Borough Council. We consider that the Council has failed to properly address the technical and reasoned arguments put forward by local residents and further, that the inconsistencies in treatment of sites suggests that the Council has not acted impartially. We cite the following as our request for a meeting. * The Plan document and process to date have failed to take into account detailed, evidence-based issues raised by the PLNRA during the previous consultation processes. In October 2017 PLNRA produced a detailed evidenced-based objections document which the Council did not acknowledge or respond to the concerns raised. * This site received one of the largest number of objections to the 2016 consultation as well as a 750-signature petition against development. There is no reference to the very large number of objections, nor the issues raised in those objections. We cannot consider the site assessment to be robust where detailed objections and evidence has not been properly addressed. * The PLNRA has consistently requested official traffic reviews of the Lane and have been told these will only be required when a planning application is submitted. We have been repeatedly told that existing traffic congestion and increased traffic concerns were insufficient reason to exclude a site from the Plan. However, one site was removed based on possible future traffic congestion while the sustainability assessment supports the development of this site, and no evidence about traffic is provided. The disparity in the treatment of the sites and inconsistency and lack of transparency in the decision-making process calls into question the soundness of the process. * The number of 75 houses is based on no factual evidence linked to the Council's planning criteria. * The Council appears to have relied upon the unsupported opinion of the developer about the viability of the access. The technical evidence submitted by the PLNRA, showing that the access does not meet road design standards and would be unsafe, has been dismissed by the Council despite telling the PLNRA that decisions would be based only on evidence. * The traffic junction analysis data is</p>	<p>The Council's proposed spatial strategy is to focus on our transport corridors as sustainable places to grow. These corridors flow through urban areas and Green Belt. The Council is not able to fully meet the development needs of the borough without considering land currently within Green Belt. A sequential approach to growth has been applied, starting with the consideration of land within urban areas (i.e. not Green Belt, which includes brownfield and greenfield land). Land at Priests Lane is within the Brentwood urban area and in a sustainable location with good access to local infrastructure. It is considered important to utilise land in urban areas to meet development needs before resorting to Green Belt release. The Council recognises the concerns expressed by local residents regarding the impacts of development and has proposed to reduce the number of homes delivered through an Addendum of Focussed Changes. This has been part of several consultations through the plan-making process over time to engage with local residents. The evidence base has informed the Local Plan and been updated over time. The Council has published an Infrastructure Delivery Plan (IDP) that sets out the borough's current infrastructure position and impacts of new development planned with mitigation or new provision costs. The IDP is a live document able to reflect changing needs. The Council's Local Plan Transport Assessment methodology has been developed with engagement from highways authorities (Essex County Council and Highways England).</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		seriously flawed and it appears that the data has been cherry-picked to ensure that the junction tests are met. <i>Remove site R19 from the plan</i>		
23926 - mr simon Fleming [7119] 23934 - Glenda Fleming [3779]	Object	Re policy A (b): This policy relates solely to Site 044. Site 178 is too small for a care home.  <i>ADD Paragraph 9.176A: "Policy R19 relates to two adjoining sites, HELAA refs 044 (Land off Priests' Lane - former Ursuline Playing Fields, 4.5 Ha) and 178 (Land off Bishop Walk, 0.6 Ha). The large-site planning policies outlined above are only applicable to Site 044 and should not delay a smaller scale housing development on Site 178."</i>	The Council has highlighted the importance of site allocations in multiple ownerships coming forward through collaborative masterplanning to ensure delivery of quality policy compliant development that benefits both new and existing communities. The alternative could result in segregated development that bears no relationship with surrounding communities to their detriment. To this end, the Council published a Site Analysis Overview (February 2019) to accompany the Local Plan and set out these principles on sites where there are multiple ownerships. This supports the proposals of Policy R19. The Council is committed the continuation of joint working with landowners to achieve quality placemaking in new development	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22678 - Priests Lane Neighbourhood Residents Association (Mrs Cath Kenyon) [6046]	Object	<p>Failure to preserve a Protected Open Urban Space, previously a school playing field.</p> <p>Several issues with the LDP and question the transparency and robustness of the process carried out by Brentwood Borough Council. We consider that the Council has failed to properly address the technical and reasoned arguments put forward by local residents and further, that the inconsistencies in treatment of sites suggests that the Council has not acted impartially. We cite the following as our request for a meeting. * The Plan document and process to date have failed to take into account detailed, evidence-based issues raised by the PLNRA during the previous consultation processes. In October 2017 PLNRA produced a detailed evidenced-based objections document which the Council did not acknowledge or respond to the concerns raised. * This site received one of the largest number of objections to the 2016 consultation as well as a 750-signature petition against development. There is no reference to the very large number of objections, nor the issues raised in those objections. We cannot consider the site assessment to be robust where detailed objections and evidence has not been properly addressed. * The PLNRA has consistently requested official traffic reviews of the Lane and have been told these will only be required when a planning application is submitted. We have been repeatedly told that existing traffic congestion and increased traffic concerns were insufficient reason to exclude a site from the Plan. However, one site was removed based on possible future traffic congestion while the sustainability assessment supports the development of this site, and no evidence about traffic is provided. The disparity in the treatment of the sites and inconsistency and lack of transparency in the decision-making process calls into question the soundness of the process. * The number of 75 houses is based on no factual evidence linked to the Council's planning criteria. * The Council appears to have relied upon the unsupported opinion of the developer about the viability of the access. The technical evidence submitted by the PLNRA, showing that the access does not meet road design standards and would be unsafe, has been dismissed by the Council despite telling the PLNRA that decisions would be based only</p>	<p>The Council's proposed spatial strategy is to focus on our transport corridors as sustainable places to grow. These corridors flow through urban areas and Green Belt. The Council is not able to fully meet the development needs of the borough without considering land currently within Green Belt. A sequential approach to growth has been applied, starting with the consideration of land within urban areas (i.e. not Green Belt, which includes brownfield and greenfield land). Land at Priests Lane is within the Brentwood urban area and in a sustainable location with good access to local infrastructure. It is considered important to utilise land in urban areas to meet development needs before resorting to Green Belt release. The Council recognises the concerns expressed by local residents regarding the impacts of development and has proposed to reduce the number of homes delivered through an Addendum of Focussed Changes. This has been part of several consultations through the plan-making process over time to engage with local residents. The evidence base has informed the Local Plan and been updated over time. The Council has published an Infrastructure Delivery Plan (IDP) that sets out the borough's current infrastructure position and impacts of new development planned with mitigation or new provision costs. The IDP is a live document able to reflect changing needs. The Council's Local Plan Transport Assessment methodology has been developed with engagement from highways authorities (Essex County Council and Highways England).</p>	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		on evidence. * The traffic junction analysis data is seriously flawed and it appears that the data has been cherry-picked to ensure that the junction tests are met. <i>Remove site R19 from plan</i>		
23924 - mr simon Fleming [7119] 23932 - Glenda Fleming [3779]	Object	Object to the merging of site 044 and 178 resulting in the large-site planning policies relevant to site 044 have been applied to the much smaller and entirely separate development of site 178. These include criteria A(a,b), B(a,b,c,d), C(a). Policy R19 is unnecessarily restrictive with regard to Site 178 as it would rely on successful negotiations with third parties in order to meet deadlines. Site 044 is expected to be developed over a longer time-frame than Site 178. It is important that housing development can take place at the earliest opportunity in order to meet the Council's target.  <i>ADD Paragraph 9.176A: "Policy R19 relates to two adjoining sites, HELAA refs 044 (Land off Priests' Lane - former Ursuline Playing Fields, 4.5 Ha) and 178 (Land off Bishop Walk, 0.6 Ha). The large-site planning policies outlined above are only applicable to Site 044 and should not delay a smaller scale housing development on Site 178."</i>	The Council has highlighted the importance of site allocations in multiple ownerships coming forward through collaborative masterplanning to ensure delivery of quality policy compliant development that benefits both new and existing communities. The alternative could result in segregated development that bears no relationship with surrounding communities to their detriment. To this end, the Council published a Site Analysis Overview (February 2019) to accompany the Local Plan and set out these principles on sites where there are multiple ownerships. This supports the proposals of Policy R19. The Council is committed the continuation of joint working with landowners to achieve quality placemaking in new development.	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23925 - mr simon Fleming [7119] 23933 - Glenda Fleming [3779]	Object	<p>Re criterion A(a): A mixture of house sizes, types and affordable housing may well be appropriate when spread across a large development such as site 44 but not for site 178 which should be a continuation of the existing housing in Bishop Walk, which are 4/5 bed high value houses in large plots.</p> <p><i>ADD Paragraph 9.176A: "Policy R19 relates to two adjoining sites, HELAA refs 044 (Land off Priests' Lane - former Ursuline Playing Fields, 4.5 Ha) and 178 (Land off Bishop Walk, 0.6 Ha). The large-site planning policies outlined above are only applicable to Site 044 and should not delay a smaller scale housing development on Site 178."</i></p>	<p>The Council has highlighted the importance of site allocations in multiple ownerships coming forward through collaborative masterplanning to ensure delivery of quality policy compliant development that benefits both new and existing communities. The alternative could result in segregated development that bears no relationship with surrounding communities to their detriment. To this end, the Council published a Site Analysis Overview (February 2019) to accompany the Local Plan and set out these principles on sites where there are multiple ownerships. This supports the proposals of Policy R19. The Council is committed the continuation of joint working with landowners to achieve quality placemaking in new development.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22185 - Mr Kaixuan Wang [5939] 22188 - Mr Philip Davenport [8201] 22192 - Mrs Julie Barnwell [8205] 22193 - Mr Michael Perks [8206] 22194 - Mrs Cath Kenyon [5999] 22201 - Mr Graham Nash [5353] 22206 - Mrs Concetta Hudson [7049] 22207 - Mr Geoff Sanders [1215] 22210 - D Westfall [5310] 22213 - Mr Robin Ibrahim [5538] 22222 - Mr Paul Joyner [5486] 22225 - Year Clare Bates [8208] 22232 - Mr Robert Dohoo [5695] 22233 - Mr Robert Dohoo [5695] 22250 - Mr and Mrs Paul McEwen [4610] 22253 - Dr Paula Booth [5367] 22261 - Ms Martina Fiddimore [1342] 22281 - Priests Lane Neighbourhood Residents Association (Mrs Cath Kenyon) [6046] 22301 - Mr Richard Jeffery [6584] 22306 - Mr & Mrs A Stewart [5781] 22341 - Mr Carl Fiddimore [7026] 22481 - Miss Katherine Webster [6005] 22500 - Mr Martin Skinner [8251] 22517 - Miss Sophie Skinner [8252] 22536 - Mrs Lauren Thompson [8270] 22557 - Gerald Downey [4671] 22559 - Gerald Downey [4671] 22560 - Gerald Downey [4671] 22565 - Mrs Annette Moorhouse [5332] 22577 - Mrs Lisa Aspinall [6054] 22607 - Miss Monica Eades [8288] 22608 - Miss Monica Eades [8288]	Object	<p>The Council has failed to properly address the technical and reasoned arguments put forward by local residents and further, that the inconsistencies in treatment of sites suggests that the Council has not acted impartially. The Plan document and process to date have failed to take into account detailed, evidence-based issues raised by the PLNRA during the previous consultation processes. In October 2017 PLNRA produced a detailed evidenced-based objections document which the Council did not acknowledge or respond to the concerns raised. There is no reference to the very large number of objections in the previous consultation, nor the issues raised in those objections. We cannot consider the site assessment to be robust where detailed objections and evidence has not been properly addressed. Residents have consistently requested official traffic reviews of the Lane and have been told these will only be required when a planning application is submitted. We have been repeatedly told that existing traffic congestion and increased traffic concerns were insufficient reason to exclude a site from the Plan. However, one site was removed based on possible future traffic congestion while the sustainability assessment supports the development of this site, and no evidence about traffic is provided. The disparity in the treatment of the sites and inconsistency and lack of transparency in the decision-making process calls into question the soundness of the process. The number of 75 houses is based on no factual evidence linked to the Council's planning criteria. The Council appears to have relied upon the unsupported opinion of the developer about the viability of the access. The technical evidence submitted by the PLNRA, on behalf of residents showing that the access does not meet road design standards and would be unsafe, has been dismissed by the Council despite telling the PLNRA that decisions would be based only on evidence. The traffic junction analysis data is seriously flawed and it appears that the data has been cherry-picked to ensure that the junction tests are met. The transport assessment evidence is flawed: Middletown Hall Lane junction data was taken during exam period, therefore 1/3 fewer students. TA ignores transfer of pupils Brentwood Schools which causes most of congestion;</p>	<p>The Council's proposed spatial strategy is to focus on our transport corridors as sustainable places to grow. These corridors flow through urban areas and Green Belt. The Council is not able to fully meet the development needs of the borough without considering land currently within Green Belt. A sequential approach to growth has been applied, starting with the consideration of land within urban areas (i.e. not Green Belt, which includes brownfield and greenfield land). Land at Priests Lane is within the Brentwood urban area and in a sustainable location with good access to local infrastructure, including walking distance to Elizabeth Line stations. It is considered important to utilise land in urban areas to meet development needs before resorting to Green Belt release. The Council recognises the concerns expressed by local residents regarding the impacts of development and has proposed to reduce the number of homes delivered through an Addendum of Focussed Changes. This has been part of several consultations through the plan-making process over time to engage with local residents. The evidence base has informed the Local Plan and been updated over time. The Council has published an Infrastructure Delivery Plan (IDP) that sets out the borough's current infrastructure position and impacts of new development planned with mitigation or new provision costs. The IDP is a live document able to reflect changing needs. The Council's Local Plan Transport Assessment methodology has been developed with engagement from highways authorities (Essex County Council and Highways England). The Council's Policy, Resources and Economic Development Committee approved the Addendum of Focused Changes and also included the need for suitable access points to be provided as part of Policy R19 (Minute 135, 11 September 2019).</p>	Amend Policy R19 B a. as follows: "suitable vehicular access points via Priests Lane;"

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22609 - Miss Monica Eades [8288] 22618 - Mr Toby Skinner [7179] 22656 - Mrs Carol Gooderson [5909] 22657 - Mrs Carol Gooderson [5909] 22658 - Mrs Carol Gooderson [5909] 22659 - Mrs Carol Gooderson [5909] 22660 - Mrs Carol Gooderson [5909] 22661 - Mrs Carol Gooderson [5909] 22662 - Mrs Carol Gooderson [5909] 22663 - Mrs Carol Gooderson [5909] 22676 - Priests Lane Neighbourhood Residents Association (Mrs Cath Kenyon) [6046] 22680 - Priests Lane Neighbourhood Residents Association (Mrs Cath Kenyon) [6046] 22681 - Mr Michael Perks [8206] 22682 - Mr Michael Perks [8206] 22683 - Mrs Hedy Lai [5774] 22684 - Mrs Hedy Lai [5774] 22685 - Mrs Hedy Lai [5774] 22686 - Mr Francis Lai [5946] 22687 - Mr Francis Lai [5946] 22688 - Mr Francis Lai [5946] 22731 - Miss Vena Clark [5879] 22732 - Mrs Lisa Aspinall [6054] 22733 - Miss Vena Clark [5879] 22734 - Mrs Lisa Aspinall [6054] 22735 - Mrs Lisa Aspinall [6054] 22736 - Mrs Lisa Aspinall [6054] 22737 - Miss Vena Clark [5879] 22738 - Miss Vena Clark [5879] 22739 - Mrs Annette Moorhouse [5332] 22740 - Miss Vena Clark [5879]		doesn't account for increase in traffic from 1,000 Shenfield new homes; ignores impact of Elizabeth line; no specific assessment of supporting more traffic along Lane at peak times or access routes. No assessment of safety to motorists or pedestrians due to increased traffic. Priests Lane site is not sustainable - access, impact on transport network, no mitigation on local services and impact on health due to pollution. Duty to cooperate not addressed as comments from residents regarding access routes, impact on Priests Lane, loss of protected open space, increase in pollution, or suitability of road not considered. Plan is not NPPF compliant as ignores traffic concerns, need for educational facilities, or health provision.		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22741 - Miss Vena Clark [5879]				
22742 - Miss Vena Clark [5879]				
22743 - Miss Vena Clark [5879]				
22744 - Ms Jan Sanders [6007]				
22745 - Ms Jan Sanders [6007]				
22746 - Ms Jan Sanders [6007]				
22747 - Ms Jan Sanders [6007]				
22748 - Ms Jan Sanders [6007]				
22749 - Ms Jan Sanders [6007]				
22750 - Ms Jan Sanders [6007]				
22751 - Ms Jan Sanders [6007]				
22752 - Ms Beryl Joyce Clark [1635]				
22753 - Ms Beryl Joyce Clark [1635]				
22754 - Ms Beryl Joyce Clark [1635]				
22755 - Ms Beryl Joyce Clark [1635]				
22756 - Ms Beryl Joyce Clark [1635]				
22757 - Ms Beryl Joyce Clark [1635]				
22758 - Ms Beryl Joyce Clark [1635]				
22759 - Ms Beryl Joyce Clark [1635]				
22762 - Julia Ebsworth [5462]				
22763 - Julia Ebsworth [5462]				
22764 - Julia Ebsworth [5462]				
22765 - Julia Ebsworth [5462]				
22766 - Julia Ebsworth [5462]				
22767 - Julia Ebsworth [5462]				
22768 - Julia Ebsworth [5462]				
22769 - Julia Ebsworth [5462]				
22770 - Mr Robert Plumtree [1544]				
22771 - Mr Robert Plumtree [1544]				
22772 - Mr Robert Plumtree [1544]				
22773 - Mr Robert Plumtree [1544]				
22774 - Mr Robert Plumtree [1544]				
22775 - Mr Robert Plumtree				

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
[1544] 22776 - Mr Robert Plumtree [1544] 22777 - Mr Robert Plumtree [1544] 22778 - Mrs June Jackson [8296] 22779 - Mrs June Jackson [8296] 22780 - Mrs June Jackson [8296] 22781 - Mrs June Jackson [8296] 22782 - Mrs June Jackson [8296] 22783 - Mrs June Jackson [8296] 22784 - Mrs June Jackson [8296] 22785 - Mrs June Jackson [8296] 22786 - Mr Richard Booth [5354] 22787 - Mr Richard Booth [5354] 22788 - Mr Richard Booth [5354] 22789 - Mr Richard Booth [5354] 22790 - Mr Richard Booth [5354] 22791 - Mr Richard Booth [5354] 22792 - Mr Richard Booth [5354] 22793 - Mr Richard Booth [5354] 22794 - Dr Paula Booth [5367] 22795 - Dr Paula Booth [5367] 22796 - Dr Paula Booth [5367] 22797 - Dr Paula Booth [5367] 22798 - Dr Paula Booth [5367] 22799 - Dr Paula Booth [5367] 22800 - Dr Paula Booth [5367] 22801 - Dr Paula Booth [5367] 22802 - Ms Kiera Booth [8297] 22803 - Ms Kiera Booth [8297] 22804 - Ms Kiera Booth [8297] 22805 - Ms Kiera Booth [8297] 22806 - Ms Kiera Booth [8297] 22807 - Ms Kiera Booth [8297] 22808 - Ms Kiera Booth [8297] 22809 - Ms Kiera Booth [8297] 22810 - Mr Vincent Burgess [5748] 22811 - Mr Vincent Burgess [5748] 22812 - Mr Vincent Burgess [5748] 22813 - Mr Vincent Burgess [5748] 22814 - Mr Vincent Burgess				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
[5748] 22815 - Mr Vincent Burgess [5748] 22816 - Mr Vincent Burgess [5748] 22817 - Mr Vincent Burgess [5748] 22844 - Mr David Gooderson [5871] 22845 - Mr David Gooderson [5871] 22846 - Mr David Gooderson [5871] 22847 - Mr David Gooderson [5871] 22848 - Mr David Gooderson [5871] 22849 - Mr David Gooderson [5871] 22850 - Mr David Gooderson [5871] 22851 - Mr David Gooderson [5871] 22889 - Miss. L.E. Mittins [1260] 22890 - Mr Richard Jeffery [6584] 22891 - Mr Richard Jeffery [6584] 22892 - Mr Richard Jeffery [6584] 22893 - Mr Richard Jeffery [6584] 22901 - Mr Ian Hollocks [5334] 22902 - Mr Ian Hollocks [5334] 22903 - Mr Ian Hollocks [5334] 22904 - Mr Ian Hollocks [5334] 22905 - Mr Ian Hollocks [5334] 22906 - Mr Ian Hollocks [5334] 22907 - Mr Ian Hollocks [5334] 22908 - Mrs Annette Moorhouse [5332] 22909 - Mrs Annette Moorhouse [5332] 22910 - Mrs Annette Moorhouse [5332] 22912 - Mrs Annette Moorhouse [5332] 22913 - Mrs Annette Moorhouse [5332] 22914 - Mrs Annette Moorhouse				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
[5332]				
22915 - Mrs Annette Moorhouse				
[5332]				
22933 - Mr Kevin Craske [2712]				
22938 - Dr Paula Booth [5367]				
22940 - Dr Paula Booth [5367]				
22941 - Dr Paula Booth [5367]				
22942 - Dr Paula Booth [5367]				
22944 - Mr Robert Dohoo [5695]				
22946 - Mr Robert Dohoo [5695]				
22948 - Year Clare Bates [8208]				
22950 - Year Clare Bates [8208]				
22956 - mr Philip Davenport				
[8201]				
22957 - mr Philip Davenport				
[8201]				
22958 - mr Philip Davenport				
[8201]				
22959 - mr Philip Davenport				
[8201]				
22960 - mr Philip Davenport				
[8201]				
22961 - mr Philip Davenport				
[8201]				
22962 - mr Philip Davenport				
[8201]				
22963 - mr Philip Davenport				
[8201]				
22964 - Mr Geoff Sanders [1215]				
22965 - Mr Geoff Sanders [1215]				
22966 - Mr Geoff Sanders [1215]				
22967 - Mr Geoff Sanders [1215]				
22968 - Mr Geoff Sanders [1215]				
22996 - Mr Robin Ibrahim [5538]				
22998 - Mr Robin Ibrahim [5538]				
22999 - Mr Robin Ibrahim [5538]				
23000 - Mr Robin Ibrahim [5538]				
23001 - Mr Robin Ibrahim [5538]				
23343 - Ms Elaine Gale [8314]				
23349 - Mr. Andrew Rowland				
[1271]				
23350 - Mr. Andrew Rowland				
[1271]				
23351 - Mr. Andrew Rowland				
[1271]				
23415 - Mr Ian Colclough [5765]				



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23416 - Mark Fenton [7818]				
23417 - Mr Ian Colclough [5765]				
23418 - Mr Ian Colclough [5765]				
23419 - Mr Ian Colclough [5765]				
23420 - Mr Ian Colclough [5765]				
23421 - Mr Ian Colclough [5765]				
23422 - Mr Ian Colclough [5765]				
23423 - Mr Ian Colclough [5765]				
23424 - Mr Jonathan Lynch [8319]				
23425 - Mr Jonathan Lynch [8319]				
23426 - Mr Jonathan Lynch [8319]				
23441 - Mrs Cath Kenyon [5999]				
23442 - Mrs Cath Kenyon [5999]				
23443 - Mrs Cath Kenyon [5999]				
23444 - Mrs Cath Kenyon [5999]				
23445 - Mrs Cath Kenyon [5999]				
23446 - Mrs Cath Kenyon [5999]				
23447 - Mrs Cath Kenyon [5999]				
23448 - Mrs Cath Kenyon [5999]				
23449 - Mrs Cath Kenyon [5999]				
23450 - Mrs Cath Kenyon [5999]				
23871 - Ian Hollocks [5606]				
23872 - Ian Hollocks [5606]				
23875 - Miss Amelia Skinner [5686]				
23940 - Mr Steven Hearn [5492]				
25627 - Mrs Helen Pearson [5910]				
25643 - Arthur Welham [8570]				
25644 - Mr R.V. Pearson [5758]				
25645 - Mrs Jacqueline Kinnear [5759]				
25646 - Mr Brian Kinnear [5719]				
25647 - Mrs Carol Ann Hennessy [5981]				
25661 - Mr Gavin Hennessy [5984]				
25662 - Mrs Wendy Washington [8080]				
25663 - Mr Martin Ballard [8227]				
25672 - Mrs Jane Ballard [5532]				
25787 - Mr Robert Payne [5511]				
25793 - Mrs Sylvia Allum [5419]				
25794 - Mr Lawrence Allum [5420]				
25795 - Mr Richard Allum [6060]				
25802 - Claire Hamer [5461]				
25803 - Claire Hamer [5461]				

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
25846 - Mrs Jackie Andrews [7274] 26111 - Mr Russell Pearson [7499] 26465 - Mr Brian Jones [5799] 26500 - Mrs Judith Jeffery [5756]				
<i>Remove R19 Priest Lane from the plan.</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22390 - Sport England (Mr. Roy Warren) [4294] 22677 - Priests Lane Neighbourhood Residents Association (Mrs Cath Kenyon) [6046]	Object	<p>Sport England objects to the allocation of Land at Priests Lane, Shenfield for residential development in the local plan. The allocation would be contrary to the Council's evidence base in the new Playing Pitch Strategy specifically which confirmed that the loss of this site should be mitigated by investment in replacement facilities elsewhere in the Borough. The policy does not make reference to playing field mitigation. The allocation would also not accord with Government policy in the NPPF, especially paragraph 97, which specifically applies to proposals for developing playing fields.</p> <p><i>While the protection of the site and the removal of the proposed allocation from the local plan would be an acceptable solution, as an alternative, potential would exist for this objection to be addressed in accordance with paragraph 97 of the NPPF and Sport England's playing fields policy if the playing fields were acceptably replaced as a requirement of the site allocation policy. As the Council's playing pitch strategy has recently considered the matter and specifically recommended that the loss of the playing fields be mitigated through replacement playing field provision, a solution that would be acceptable would be for an appropriate financial contribution to be secured towards the delivery of replacement playing field provision either on new playing field sites or in enhancing existing playing fields nearby. This could be addressed through modifying the policy's development principles to make provision for replacement playing field provision to be a pre-requisite of the development.</i></p> <p><i>To take this matter forward with a view to reaching a mutually agreeable solution in advance of the matter being considered at the local plan examination, the Council are urged to engage with Sport England to explore a potential solution.</i></p>	<p>Noted. The playing field at Priests Lane is no longer in active use. However, the Council is committed to continued engagement with Sport England and partners to ensure adequate sports provision is provide as a result of growth in the borough. The issue is to be resolved through a Statement of Common Ground.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23927 - mr simon Fleming [7119] 23935 - Glenda Fleming [3779]	Object	<p>Re B (a): Site 178 already has direct access off Bishop Walk, a residential Type 4a Minor Access Road with an existing junction to Priest's Lane, all in accordance with Essex Highways Standards. With the limited number of houses proposed on Site 178, the traffic effect would be negligible; instead, the mitigation measures mooted at paragraph 9.172 relate solely to the new access road that will be required further down Priests' Lane for development on site 044. This should only be applicable to Site 044 and should not delay development on Site 178.</p> <p><i>ADD Paragraph 9.176A: "Policy R19 relates to two adjoining sites, HELAA refs 044 (Land off Priests' Lane - former Ursuline Playing Fields, 4.5 Ha) and 178 (Land off Bishop Walk, 0.6 Ha). The large-site planning policies outlined above are only applicable to Site 044 and should not delay a smaller scale housing development on Site 178."</i></p>	<p>The Council has highlighted the importance of site allocations in multiple ownerships coming forward through collaborative masterplanning to ensure delivery of quality policy compliant development that benefits both new and existing communities. The alternative could result in segregated development that bears no relationship with surrounding communities to their detriment. To this end, the Council published a Site Analysis Overview (February 2019) to accompany the Local Plan and set out these principles on sites where there are multiple ownerships. This supports the proposals of Policy R19. The Council is committed the continuation of joint working with landowners to achieve quality placemaking in new development.</p>	No further action
23929 - mr simon Fleming [7119] 23937 - Glenda Fleming [3779]	Object	<p>Re policy B (c): This would require negotiation with third parties and so could result in a ransom situation.</p> <p><i>ADD Paragraph 9.176A: "Policy R19 relates to two adjoining sites, HELAA refs 044 (Land off Priests' Lane - former Ursuline Playing Fields, 4.5 Ha) and 178 (Land off Bishop Walk, 0.6 Ha). The large-site planning policies outlined above are only applicable to Site 044 and should not delay a smaller scale housing development on Site 178."</i></p>	<p>The Council has highlighted the importance of site allocations in multiple ownerships coming forward through collaborative masterplanning to ensure delivery of quality policy compliant development that benefits both new and existing communities. The alternative could result in segregated development that bears no relationship with surrounding communities to their detriment. To this end, the Council published a Site Analysis Overview (February 2019) to accompany the Local Plan and set out these principles on sites where there are multiple ownerships. This supports the proposals of Policy R19. The Council is committed the continuation of joint working with landowners to achieve quality placemaking in new development.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23931 - mr simon Fleming [7119] 23939 - Glenda Fleming [3779]	Object	<p>Re policy C (a): This policy relates to Site 044. Site 178 lies within Flood Zone 1 (not subject to flooding and therefore a preferred location for development under the NPPF sequential test). Site 044 borders railway land, which is subject to flooding, and being larger than 1 Ha the development there could well have an impact.</p> <p><i>ADD Paragraph 9.176A: "Policy R19 relates to two adjoining sites, HELAA refs 044 (Land off Priests' Lane - former Ursuline Playing Fields, 4.5 Ha) and 178 (Land off Bishop Walk, 0.6 Ha). The large-site planning policies outlined above are only applicable to Site 044 and should not delay a smaller scale housing development on Site 178."</i></p>	<p>The Council has highlighted the importance of site allocations in multiple ownerships coming forward through collaborative masterplanning to ensure delivery of quality policy compliant development that benefits both new and existing communities. The alternative could result in segregated development that bears no relationship with surrounding communities to their detriment. To this end, the Council published a Site Analysis Overview (February 2019) to accompany the Local Plan and set out these principles on sites where there are multiple ownerships. This supports the proposals of Policy R19. The Council is committed the continuation of joint working with landowners to achieve quality placemaking in new development.</p>	No further action
23928 - mr simon Fleming [7119] 23936 - Glenda Fleming [3779]	Object	<p>Re policy B (b): This policy also relates solely to Site 044. Site 178 has never had public access, and in any event the site is too small to make a meaningful contribution. Instead, significant public open space has been proposed for dog-walking and play on the playing fields Site 044.</p> <p><i>ADD Paragraph 9.176A: "Policy R19 relates to two adjoining sites, HELAA refs 044 (Land off Priests' Lane - former Ursuline Playing Fields, 4.5 Ha) and 178 (Land off Bishop Walk, 0.6 Ha). The large-site planning policies outlined above are only applicable to Site 044 and should not delay a smaller scale housing development on Site 178."</i></p>	<p>The Council has highlighted the importance of site allocations in multiple ownerships coming forward through collaborative masterplanning to ensure delivery of quality policy compliant development that benefits both new and existing communities. The alternative could result in segregated development that bears no relationship with surrounding communities to their detriment. To this end, the Council published a Site Analysis Overview (February 2019) to accompany the Local Plan and set out these principles on sites where there are multiple ownerships. This supports the proposals of Policy R19. The Council is committed the continuation of joint working with landowners to achieve quality placemaking in new development.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22474 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	3. Effective. Policy R19 A. b. needs to be amended to be consistent with the wording provided in all other site allocation policies.	The word "residential" in the context of residential care home provision has been omitted from the policy in error. The Council would like to explore the potential for a residential care home to be provided as part of development in order to meet local needs and respond to the concerns of local residents about the impacts of market housing development (i.e. car use at peak times), which would likely be reduced through provision of a residential care home. As this is a smaller site than the strategic housing sites that require residential care homes, the potential provision is noted in Policy R19 and will require further work with the site promoter(s) to identify whether this is possible.	Amend Policy R19 A. b. as follows: "potential for the provision of a residential care home (around 40 bed scheme as part of the overall allocation)."
		<i>Amend Policy R19 A. b. as follows - provision of a residential care home (around 40 bed scheme as part of the overall allocation).</i>		
22566 - Mrs Annette Moorhouse [5332]	Object	I object to the inclusion of the Priests Lane site in the Local Development Plan for several reasons most significantly road safety, traffic congestion, air pollution, site access.	The Council has published the evidence base that has informed the Local Plan and updated this over time. The Council has published an Infrastructure Delivery Plan (IDP) that sets out the borough's current infrastructure position and impacts of new development planned with mitigation or new provision costs. The IDP is a live document able to reflect changing needs. The Council recognises the concerns expressed by local residents regarding the impacts of development and has proposed to reduce the number of homes delivered through an Addendum of Focussed Changes.	No further action
		<i>The plan does not comply with road safety regulations. The Priests Lane site should be removed from the Local Development plan.</i>		
23226 - Thames Water (On behalf of Thames Water) [1927]	Support	On the information available to date we do not envisage infrastructure concern regarding wastewater network or wastewater treatment infrastructure capability in relation to this sites. Please note that the above comments relate to the sewerage network within the Thames Water supply area only. It is recommended that Anglian Water are also consulted for their comments in relation to this development proposal. Drainage hierarchy to be followed in addressing surface water.	Noted	No further action
		<i>No specific change proposed</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23870 - Ursuline Sisters [28]	Support	<p>Support the allocation of site R19 ; however, the housing numbers being reduced to 95 in the light of unfounded local objection in relation to highway and traffic congestion is unsound. The policy should allow for around 100 new homes of mixed size and type. The evidence base had shown that the site was capable of accommodating some 130 homes. The Sustainability Appraisal supports the site as one of the most sustainable potential development sites within Brentwood. Its allocation is in line with the Plan's objectives and policies and aid short term housing delivery.</p> <p><i>It is recommended that criteria A- Amount and type of development be changed to increase numbers and wording to "provision for around 100 new homes of mixed size and type including affordable housing".</i></p>	The Council recognises the importance of utilising land in urban areas to meet development needs, particularly because it is having to reluctantly consider Green Belt release to meet these needs fully. However, the Council also recognises the concerns expressed by local residents regarding the impacts of development and so has proposed to reduce the number of homes delivered on site. In this regard, an attempt has been made to balance the need to grow whilst retain local character with focus on local constraints.	No further action
23266 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Anticipated mitigation as a result of development on sites R11, R12, R13, R14, R15, R18, R19 should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs. Collaboration agreement, secure Wi-Fi and clinical system installation and maintenance will be required as part of mitigation within Care Homes.</p> <p><i>Clarification of contributions proposed</i></p>	The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>9.171</i>				
22214 - Mr Robin Ibrahim [5538] 22302 - Miss. L.E. Mittins [1260] 22519 - Miss Sophie Skinner [8252]	Object	<p>Further housing in this area is not sustainable as Priests Lane is a very narrow road. Along with Friars Avenue, it is already used as a rat run between Brentwood and Shenfield and is extremely dangerous with its current traffic - this development would worsen the situation. These roads cannot take any more traffic - indeed steps should be taken to reduce traffic. Any development here would remove another small lung of green space, which is gradually being totally eroded in Shenfield.</p> <p><i>Needs to remove R19 completely to take account of increased traffic flow (which is unacceptable), safety of residents, lack of health provisions (doctors' surgeries are already overloaded) and detrimental effect on residents' health due to increased pollution, lack of transport facilities.</i></p>	<p>The Council's Local Plan Transport Assessment includes growth proposed from all site allocations as well as background growth planned in surrounding areas. The methodology has been developed through engagement from highways authorities (Essex County Council and Highways England). The assessment sets out the approach to transport modelling, modelling results and junction capacity assessments. It highlights the junctions that may require mitigation, sustainable measures proposed to support growth and the impact this has on junction assessments. The assessment prioritises the sustainable transport requirements of the Local Plan. This work has been undertaken in line with requirements. Mitigation is considered as part of the work and listed in the Council's Infrastructure Delivery Plan. Site access from Priests Lane will need to comply with highways authority standards, including safety. Policy R19 includes the requirement that public open space is provided as part of new development.</p>	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.172</b>				
22195 - Mrs Cath Kenyon [5999] 22460 - Miss Katherine Webster [6005] 22505 - Mr Martin Skinner [8251] 22520 - Miss Sophie Skinner [8252]	Object	Evidence has been supplied to the Council that the proposed access from Priests Lane is narrow with insufficient visibility splays based on Essex Design Guidelines. It will create an unsafe right-left staggered junction with a nearby road. This part of Priests Lane is narrow and winding with a pedestrian path on only one side, risk-mitigation opportunities are not available. It is often subject to heavy congestion during peak times which will be increased by this development in conjunction with other urban site developments.	The Council's Local Plan Transport Assessment includes growth proposed from all site allocations as well as background growth planned in surrounding areas. The methodology has been developed through engagement from highways authorities (Essex County Council and Highways England). The assessment sets out the approach to transport modelling, modelling results and junction capacity assessments. It highlights the junctions that may require mitigation, sustainable measures proposed to support growth and the impact this has on junction assessments. The assessment prioritises the sustainable transport requirements of the Local Plan. This work has been undertaken in line with requirements. Mitigation is considered as part of the work and listed in the Council's Infrastructure Delivery Plan. Site access from Priests Lane will need to comply with highways authority standards, including safety. Policy R19 includes the requirement that pedestrian and cycle connections are provided.	No further action
		<p><i>The proposed direct access from Priests Lane should not be considered as viable as the main access route. The Council should include proper plans to mitigate the risks and negative effects. Remove site R19 from the plan</i></p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.173</b>				
22465 - Miss Katherine Webster [6005] 22509 - Mr Martin Skinner [8251] 22521 - Miss Sophie Skinner [8252] 22537 - Mrs Lauren Thompson [8270]	Object	<p>All vehicular and pedestrian traffic from this site must use Priests Lane. This stretch of road into Brentwood is narrow and winding, it is insufficient for safe cycle ways. There is a single pedestrian path, as narrow as 1m in places, which switches sides along the roads with the crossings on blind bends. It is not conducive to pedestrians with reduced mobility. The Plan talks of enhanced connections, but has no concrete proposals to achieve it, probably because there aren't any, and so the Plan makes proposals which are unlikely to be viable.</p> <p>Changes to Plan: The proposed development is too large for this site and the Plan should say whether possibilities to improve connections exist.</p> <p><i>The proposed development is too large for this site and the Plan should say whether possibilities to improve connections exist. Remove site R19 from the plan</i></p>	<p>The Council's Local Plan Transport Assessment includes growth proposed from all site allocations as well as background growth planned in surrounding areas. The methodology has been developed through engagement from highways authorities (Essex County Council and Highways England). The assessment sets out the approach to transport modelling, modelling results and junction capacity assessments. It highlights the junctions that may require mitigation, sustainable measures proposed to support growth and the impact this has on junction assessments. The assessment prioritises the sustainable transport requirements of the Local Plan. This work has been undertaken in line with requirements. Mitigation is considered as part of the work and listed in the Council's Infrastructure Delivery Plan. Site access from Priests Lane will need to comply with highways authority standards, including safety. Policy R19 includes the requirement that pedestrian and cycle connections are provided.</p>	No further action
22215 - Mr Robin Ibrahim [5538] 22218 - Mr Robin Ibrahim [5538]	Object	<p>With flawed and missing evidence, in particular transport impact, more education and health infrastructure is needed, site location unsuitable.</p> <p><i>Remove site R19 from plan</i></p>	<p>The Council has published the evidence base that has informed the Local Plan and updated this over time. The Council has published an Infrastructure Delivery Plan (IDP) that sets out the borough's current infrastructure position and impacts of new development planned with mitigation or new provision costs. The IDP is a live document able to reflect changing needs. The Council recognises the concerns expressed by local residents regarding the impacts of development and has proposed to reduce the number of homes delivered through an Addendum of Focussed Changes.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.174</b>				
22471 - Miss Katherine Webster [6005] 22512 - Mr Martin Skinner [8251]	Object	Developing travel packs will not properly address the traffic and transport problems. In the case of this site, a travel pack will have no mitigating effect and is not a realistic solution. I do not think that this meets NPPF guidelines on mitigating traffic risks.	The requirement for a Residential Travel Information Pack is set by the highways authority (Essex County Council) and supports the Council's aims for sustainable travel. The Council has published an Infrastructure Delivery Plan (IDP) that sets out the borough's current infrastructure position and impacts of new development planned with mitigation or new provision costs. The IDP is a live document able to reflect changing needs	No further action
		<i>The travel pack is irrelevant. Remove site R19 from the plan</i>		
<b>9.175</b>				
22476 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	2. Justified.  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 welcomes the proposed creation of 6th form provision at Endeavour school and intends to commission some of the places for local children with an Education Health and Care Plan. The 6th form provision will enable local children to continue their education within their community and reduce travel time to specialist establishments elsewhere. This should be reflected in paragraph 9.175.  <i>Amend paragraph 9.175 as follows - The Endeavour School is a Special Educational Needs school which adjoins the site to the south is seeking to expand to accommodate a 6th form. ECC welcomes this proposal and intends to commission some of the places for local children with an Education Health and Care Plan. The 6th form provision will enable local children to continue their education within their community and reduce travel time to specialist establishments elsewhere. The school....'</i>	The Council welcomes the support of Essex County Council to create sixth-form provision for the Endeavour School as part of development proposals from Policy R19. The Council has worked with the Endeavour School as part of these proposals and suggests that Essex County Council should liaise closely with the school as part of the proposed Education Health and Care Plan.	Amend paragraph 9.175 as follows: "The Endeavour School (a Special Educational Needs school), which adjoins the site to the south, is seeking to expand to accommodate a 6th form. Essex County Council welcomes this proposal and intends to commission some of the places for local children with an Education Health and Care Plan. The 6th form provision will enable local children to continue their education within their community and reduce travel time to specialist establishments elsewhere. The school does not currently have the available land to expand. Land adjoining the school within the development site should be utilised to accommodate the expansion."

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22219 - Mr Robin Ibrahim [5538]	Object	With flawed evidence, in particular transport impact, more education and health infrastructure is needed, site location unsuitable.	The Council has published the evidence base that has informed the Local Plan and updated this over time. The Council has published an Infrastructure Delivery Plan (IDP) that sets out the borough's current infrastructure position and impacts of new development planned with mitigation or new provision costs. The IDP is a live document able to reflect changing needs. The Council recognises the concerns expressed by local residents regarding the impacts of development and has proposed to reduce the number of homes delivered through an Addendum of Focussed Changes.	No further action
<i>Remove site R19 from plan</i>				
<i>9.176</i>				
22477 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	2. Justified. 3. Effective. 4. Consistent with National Policy. Request replacement of paragraph 9.176 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.  <i>Replace paragraph 9.176 with the following wording: The site falls within the Shenfield CDA and Brentwood 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.</i>	Existing wording for paragraph 9.176 is still considered appropriate to meet the aims of what is being described.	No further action
22220 - Mr Robin Ibrahim [5538]	Object	With flawed evidence, in particular transport impact, more education and health infrastructure is needed, site location unsuitable.	The Council has published the evidence base that has informed the Local Plan and updated this over time. The Council has published an Infrastructure Delivery Plan (IDP) that sets out the borough's current infrastructure position and impacts of new development planned with mitigation or new provision costs. The IDP is a live document able to reflect changing needs. The Council recognises the concerns expressed by local residents regarding the impacts of development and has proposed to reduce the number of homes delivered through an Addendum of Focussed Changes.	No further action
<i>Remove site R19 from plan</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY R20: THE EAGLE AND CHILD PUBLIC HOUSE</i></b>				
24150 - Wiggins Gee Homes Ltd [2788]	Object	<p>Policies R10-R15 and R20 are all small urban sites. If these sites are suitable, available and achievable it must be surprising that at least some of them are not yet developed, Policy R20 concerns the Eagle and Child PH in Shenfield, with an estimated delivery of 20 new dwellings between 2021/22 and 2022/23. This site is surely best regarded as a windfall site, contributing to this stream of new housing supply as and when it is finally redeveloped. The fact that it first appeared in 2009's Call for Sites suggests that there is no urgency on behalf of the current site owners to take things forward. No application has been submitted over the past five years.</p> <p>The general point we are making here is that a number of the Pre-Submission Document's brownfield allocations have been under consideration for ten years or more. Some of them, like the town centre car parks, will be complicated to redevelop. We have emphasised throughout the Local Plan process that many of these sites were unlikely to make early contributions to meeting housing supply requirements, unlike our client's site at Pilgrims Hatch that is straightforward to develop and in a single, willing ownership. The problem remains, and supports our contention that the Plan needs more easier to develop sites, with an ownership ready to start.</p> <p><i>Removal of Allocation R20. This is a small site and should be categorised as a potential windfall site. At present, there appears to be no certainty about its availability.</i></p> <p><i>We also think that, without any direct evidence of intent on behalf of the landowner, Allocation R10 should also be removed.</i></p> <p><i>Policy R11 - the third sentence of related paragraph 9.137 should be re-worded, for the reasons outlined in our answer to Question 5 above, as follows:</i></p> <p><i>"The site will provide for around 45 homes, anticipated to be delivered between 2023/24 and 2024/25".</i></p> <p><i>Policy R13 - the third sentence of related paragraph 9.146 should be re-worded, for the reasons outlined in our answer to Question 5 above, as follows:</i></p> <p><i>"The site will provide for around 31 homes, anticipated to be delivered between 2023/24 and 2024/25".</i></p>	Disagree that site R20 should be removed from the plan. The site is being actively promoted by the site promoter and is considered deliverable within the Plan period. This site meets the Councils strategy as it is brownfield and within a highly sustainable location, the Shenfield urban area.	No further action

<b>Representations</b>	<b>Nature</b>	<b>Summary of Main Issue/Change to Plan</b>	<b>Council's Assessment</b>	<b>Action</b>
23254 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Anticipated mitigation as a result of development on sites R03 and R20 should include contribution towards increasing capacity by means of extension, reconfiguration, possible relocation of an existing service/s or/and recruitment costs. Collaboration agreement, secure Wi-Fi and clinical system installation and maintenance will be required as part of mitigation within Care Homes.</p> <p><i>Mitigation clarification needed</i></p>	The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.	No further action
<b>9.179</b>				
22523 - Miss Sophie Skinner [8252]	Object	<p>Travel Packs are not a realistic or practical way of mitigating the traffic problems. This does not replace the Council's responsibility to properly consider how to mitigate the risks and state what they plan to do. I do not think a travel plan will affect how people travel at all. The reality is people will drive into town from here.</p> <p><i>The Plan should recognise the limitations of the sites rather than adopt a ineffectual solution of providing travel packs. This is not a sound approach to dealing with the problems.</i></p>	The use of travel packs is recommended by the Highway Authority in encouraging the use of sustainable transport measures. This is considered appropriate for the scale of development being proposed.	No further action
<b>9.180</b>				
22478 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Request replacement of paragraph 9.180 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Replace paragraph 9.180 with the following wording: The site falls within the Shenfield 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.</i></p>	Existing wording for paragraphs 9.180 is still considered appropriate to meet the aims of what is being described.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Land South of Ingatestone</i>				
22179 - mr James Kemble [8176]	Object	<p>The Garden Centre site offered public access to green space enjoyment by virtue of its woods, gardens, walkways as well as garden produce business. Loss of this space has not been replaced. There is no other significant public access green space on south of the village.</p> <p><i>Restore Garden Centre site to public access nature resource. This site was designated green space with light business use. It was not designated brownfield so there has been a change of designation.</i></p>	All development proposals would be expected to provide adequate open space provision in accordance with Policy BE22 Open Space in New Development. It is expected that site R21 would be able to achieve this.	No further action
<i>POLICY R21: LAND SOUTH OF INGATESTONE</i>				
22479 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective. Policy R21 B. d. covers 2 separate matters (landscape buffers and heritage) and should be split into two criteria.</p> <p><i>Amend Policy R21 B. d. as follows to separate into two criteria -</i>  <i>d. provide for appropriate landscaping and buffers along sensitive boundary adjoining the A12 and railway line; and</i>  <i>e. provide a heritage assessment taking account of archaeological potential for the proximity to Roman Road</i></p>	Noted. Agree to amendment.	Amend as advised
22573 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Object	<p>Policy wording lacks a commitment to deliver biodiversity net gain.</p> <p><i>Policy wording should be amended as follows: b. provision for "multifunctional" public open space "to deliver a measurable net gain in biodiversity";</i></p>	Noted. No changes proposed to site policy but will update Policy NE01 in line with NPPF requirements for securing net gains for biodiversity.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26512 - Wiggins Gee Homes Ltd [2788]	Object	<p>R21 is a relatively narrow triangular site lying between the mainline railway and the A12. Previously described as land adjacent to the garden centre, we now note that the proposed allocation includes the garden centre. The site is at a level with the A12 and the railway, with consequent air and noise pollution issues. The allocation's extension northwards to the rear of homes in Burnthouse Lane means that it will form a long, southern extension to Ingatestone. It will consolidate coalescence with Mounthessing, which lies to the west of the site on the other side of the A12. Our comments made in 2018 regarding social isolation and pollution remain correct. R03, R16, R17, R21, R22 allocations are all bounded by the A12 to a greater or lesser extent. As noted in our representations on Policy NE05, the Pre-Submission Document's paragraph 8.50 states that transport generated emissions are the prime source of air pollution in the Borough. We have consistently questioned the wisdom of locating new housing next to the A12 on the grounds of public health. All these proposed allocations, in whole or part, have significant issues resulting from their proximity to principal sources of air and noise pollution. There is conflict with the Pre-Submission Document's own policies on these issues, including Policy NE05. Consequently we are suggesting a number of modifications to the relevant policies.</p> <p><i>We propose the following modifications for the reasons outlined in our response to the Local Plan consultation. Strengthen the wording of all policies to ensure that appropriate air and noise pollution measures form an integral part of any development proposals. Wherever there is reference to either the A12, or the mainline railway, the related criterion should read as follows:</i></p> <p><i>"appropriate measures, including barriers, embankments and landscaping, to reduce air and noise must be provided along the site's boundary(ies) with the A12 and/or the mainline railway."</i></p> <p><i>Removal of R17 from Policy R16 and R17.</i></p> <p><i>Removal from proposed allocation R03 of the elliptical shaped piece of land between the A1023 Chelmsford Road and the A12 Marylands Interchange, and the area to the north of the site bounded by the Marylands Interchange to the north, the railway line to the south-</i></p>	Policy SP01 Sustainable Development Part D (e & f) set out the requirement to ensure development does not cause unacceptable effect no health, the environment or amenity due to the release of pollutants such as light and noise. It is considered that the site will be able to provide adequate mitigation in conformity with this policy.	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>east, a part of Arnold's Wood to the south-west and Chelmsford Road to the north-west.</p> <p>Removal of Allocation R21 on grounds of poor physical environment, isolation from the main settlement of Ingatestone and coalescence with the village of Mounthessing. Removal of Allocation R22 on grounds of poor physical environment</p>		
26110 - Mrs. Dorothy Auduc [2542]	Object	<p>Ingatestone Garden Centre: The plan showing the garden centre is not correct.</p> <p>a) There are two pieces of land between Burnt House Lane and the garden centre that should not be included IE: the plot of Green Belt behind the gardens of 2 and 2A BHL and a further large plot of land which is owned by somebody else and has nothing to do with the garden centre. b) Between the GC and the A12 works site is the recycling centre. Have you overlooked this? C) The proposed development started with 60 homes which was far too many bearing in mind its position. Now this has been increased to 161 homes plus a further 57 homes a 1/4 of a mile down Roman Road. This will mean 218 homes with approx. 400 or more extra cars all using Roman Road? The slip road to the A12 which is needed for emergency services. D) This site is just too big? In the wrong place.</p> <p><i>Remove site R21 from the plan</i></p>	<p>The site boundary for site R21 includes a number of different parcels of land which are all bounded by the A12, Roman Road, railway line and properties along Burnt House Lane. All of this land is currently designated as Green Belt and are proposed to be removed. It would be expected that as development comes forwards that there is consideration of creating improved connections throughout the site.</p>	No further action
23268 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Anticipated mitigation as a result of development on this site should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs.</p> <p><i>Clarification of mitigation costs</i></p>	<p>The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.185</b>				
22480 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective. 4. Consistent with National Policy. Request replacement of paragraph 9.185 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Replace paragraph 9.185 with the following wording: The site falls within the Mountnessing 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.</i></p>	Existing wording for paragraphs 9.185 is still considered appropriate to meet the aims of what is being described	No further action
<hr/>				
<b><i>POLICY R22: LAND ADJACENT TO THE A12, INGATESTONE</i></b>				
22180 - mr James Kemble [8176]	Object	<p>This field is a "breathing space" between building development of Ingatestone village and Heybridge. Building houses here would destroy that discontinuity. It would also further erode the rural nature which has already been partly compromised by the recent Harebridge (Heybridge) housing development. There would be almost no gap between Ingatestone and Mountnessing on B1002.</p> <p><i>Retain the field as open land and develop it for public access leisure</i></p>	The site is considered to be a suitable housing allocation which meets with the aims of the spatial strategy.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26513 - Wiggins Gee Homes Ltd [2788]	Object	<p>Still think it extraordinary to propose this allocation as a satisfactory environment for new homes. There are houses immediately to the south-west along Roman Road, but their presence should not be seen as a justification. The site is at a level with the A12, with the B1002 on the site's northern boundary elevated to cross the A12. We said in our response to 2018's Preferred Sites Consultation that no further consideration should be given to this site and nothing in the Pre-Submission Document has changed our views on this. R03, R16, R17, R21, R22 allocations are all bounded by the A12 to a greater or lesser extent. As noted in our representations on Policy NE05, the Pre-Submission Document's paragraph 8.50 states that transport generated emissions are the prime source of air pollution in the Borough. We have consistently questioned the wisdom of locating new housing next to the A12 on the grounds of public health. All these proposed allocations, in whole or part, have significant issues resulting from their proximity to principal sources of air and noise pollution. There is conflict with the Pre-Submission Document's own policies on these issues, including Policy NE05. Consequently we are suggesting a number of modifications to the relevant policies.</p> <p><i>We propose the following modifications for the reasons outlined in our response to the Local Plan consultation. Strengthen the wording of all policies to ensure that appropriate air and noise pollution measures form an integral part of any development proposals. Wherever there is reference to either the A12, or the mainline railway, the related criterion should read as follows:</i></p> <p><i>"appropriate measures, including barriers, embankments and landscaping, to reduce air and noise must be provided along the site's boundary(ies) with the A12 and/or the mainline railway."</i></p> <p><i>Removal of R17 from Policy R16 and R17.</i></p> <p><i>Removal from proposed allocation R03 of the elliptical shaped piece of land between the A1023 Chelmsford Road and the A12 Marylands Interchange, and the area to the north of the site bounded by the Marylands Interchange to the north, the railway line to the south-east, a part of Arnold's Wood to the south-west and Chelmsford Road to the north-west.</i></p> <p><i>Removal of Allocation R21 on grounds of poor</i></p>	<p>Policy SP01 Sustainable Development Part D (e &amp; f) set out the requirement to ensure development does not cause unacceptable effect no health, the environment or amenity due to the release of pollutants such as light and noise. It is considered that the site will be able to provide adequate mitigation in conformity with this policy.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<i>physical environment, isolation from the main settlement of Ingatestone and coalescence with the village of Mounthessing. Removal of Allocation R22 on grounds of poor physical environment.</i>		
24007 - CALA Homes [5237]	Support	Strong support for the proposed allocation of land adjacent to the A12 Ingatestone site for around 57 homes (Policy R22) and we look forward to continuing discussions with the Council with respect to bringing the site forward for delivery at the earliest opportunity. A planning application is now being prepared and a pre-application meeting will take place in the near future.  <i>No change proposed</i>	Noted	No further action
23269 - Mid and South Essex STP (Kerry Harding) [3791]	Support	Anticipated mitigation as a result of development on this site should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs.  <i>Mitigation needs to be clarified</i>	The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.	No further action
<i>9.190</i>				
22482 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	2. Justified. 3. Effective. 4. Consistent with National Policy. Request replacement of paragraph 9.190 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.  <i>Replace paragraph 9.190 with the following wording: The site falls within the Mounthessing 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.</i>	Existing wording for paragraphs 9.190 is still considered appropriate to meet the aims of what is being described.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY R23: BRIZES CORNER FIELD</i></b>				
22483 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified. 3. Effective. 4. Consistent with National Policy. Request insertion of clarification in respect of Floods and SuDS after paragraphs 9.193, 9.196 and 9.200, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Insert following wording as additional paragraph after paragraphs 9.193, 9.196 and 9.200 - The proposed development area is not within areas identified at risk of flooding. It should however be ensured that any development within this area complies with flood risk mitigation measures outlined in the Essex SuDS guide.</i></p>	This requirement is already covered under Policy NE06 Flood Risk and therefore not considered necessary to add to Policy R23.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24334 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The proposed allocation of Land off Blackmore Road as Policy R23 and its removal from the Green Belt is considered sound and is fully supported. It has been established through the evidence base supporting the PSLP that Kelvedon Hatch is a sustainable location to accommodate a modest amount of new houses to contribute to the Borough's housing needs. Indeed, as recognised by para 68 of the NPPF and as a medium sized site, such sites make an important contribution to "meeting the housing requirement of an area and are often built out quickly". We do however have some concerns with the amount of development set out at A of the Policy, the indicative yield at page 339 and the suggested trajectory for the site at Appendix 1. These representations provide for a modest increase in the developable area of the site with compensatory open space/structural landscaping. Supporting these representations is a Vision Document at Appendix A, a review of Green Belt and Landscape Sensitivity at Appendix B and a Summary Drainage and Utility Appraisal at Appendix C. These all confirm that the development at the site is both justified and fully deliverable within the terms of para 67a) of the NPPF. These representations suggest that the allocated area could increase to provide for a modest addition to the developable area in association with compensatory open space and structural landscaping. It is considered that the proposals would be in accordance with para 138 of the NPPF. Part A of Policy R23 suggests that there be provision for around 23 new homes on the site. Part A Policy HP03 of the PSLP requires proposals to take a design led approach to density to ensure schemes are sympathetic to local character and make efficient use of land. Part B expects development to achieve a net density of at least 35dph unless the special character of the surrounding area suggests that such densities would be inappropriate. Based on page 339 of the PSLP, the suggested dwelling yield of 23 homes would result in a density of 29dph. The Vision Document confirms that within the allocated area it would be possible to provide around 28 homes at a density of 35dph. these representations sets out the need for greater flexibility and need for the provision of medium sized sites to aid the Council's housing needs and requirements. Against this background,</p>	<p>The 23 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher or lower than the dwelling numbers indicated provided it is in conformity with other policies in the plan.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>these proposals to provide a modest increase to the allocated area for R23 are commended to the Council on the basis that the increased area provide for structural and accessible open space. It is therefore recommended that Policy R23 is amended to Policy R23A - substitute 23 new homes with 45 new homes; Policy R23B - additional bullet point b - development shall provide for not less than 0.7ha for accessible public open space and structural landscaping; Page 339 R23 - indicative dwelling yield substitute 23 with 45.</p> <p><i>Representations sets out the need for greater flexibility and need for the provision of medium sized sites to aid the Council's housing needs and requirements. Against this background, these proposals to provide a modest increase to the allocated area for R23 are commended to the Council on the basis that the increased area provide for structural and accessible open space. It is therefore recommended that Policy R23 is amended as follows:</i></p> <p><i>a. Policy R23A - substitute 23 new homes with 45 new homes; b. Policy R23B - additional bullet point b - development shall provide for not less than 0.7ha for accessible public open space and structural landscaping; and c. Page 339 R23 - indicative dwelling yield substitute 23 with 45.</i></p>		
23270 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Anticipated mitigation as a result of development on this site should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs.</p> <p><i>Clarify mitigation costs for this site</i></p>	The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23227 - Thames Water (On behalf of Thames Water) [1927]	Support	<p>On the information available to date we do not envisage infrastructure concern regarding wastewater network or wastewater treatment infrastructure capability in relation to this site. Please note that the above comments relate to the sewerage network within the Thames Water supply area only. It is recommended that Anglian Water are also consulted for their comments in relation to this development proposal. Drainage hierarchy to be followed in addressing surface water.</p> <p><i>No specific change proposed</i></p>	Policy NE06 Flood Risk sets out under part E that where sewerage capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development.	No further action
<i>Land off Stocks Lane, Kelvedon Hatch</i>				
22485 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified. 3. Effective. 4. Consistent with National Policy. Request insertion of clarification in respect of Floods and SuDS after paragraphs 9.193, 9.196 and 9.200, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Insert following wording as additional paragraph after paragraphs 9.193, 9.196 and 9.200 - The proposed development area is not within areas identified at risk of flooding. It should however be ensured that any development within this area complies with flood risk mitigation measures outlined in the Essex SuDS guide</i></p>	This requirement is already covered under Policy NE06 Flood Risk and therefore not considered necessary to add to Policy R23	No further action
<i>POLICY R24: LAND OFF STOCKS LANE</i>				
22575 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Object	<p>Policy wording omits to mention the need to avoid impacts on Bre57 Furze Wood LoWS. Policy wording lacks a commitment to deliver biodiversity net gain.</p> <p><i>b. provision for "multifunctional" publicly accessible open space to deliver a measurable net gain in biodiversity;</i></p> <p><i>c. protect and enhance Bre57 Furze Wood LoWS</i></p>	Noted. No changes proposed to site policy in respect of biodiversity net gain but will update Policy NE01 in line with NPPF requirements for securing net gains for biodiversity. Suggest additional criterion in respect of Firze Wood LoWS worded as follows: 'protect and where appropriate enhance the Local Wildlife Site (Furze Wood)'.	Additional criterion to be added: 'protect and where appropriate enhance the Local Wildlife Site (Furze Wood)'.



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26037 - Ms Elaine Harris [8667]	Object	<p>I consider the proposal to build numerous houses within our small beautiful village appalling! We recently moved to the village and do not wish this wonderful place to change. I object to building on green belt land. The village is prone to flooding and thus development will increase the risk. Our small community does not have the infrastructure to cope with all the additional people these homes would contain. The local primary school is already full. The roads congested. The doctors surgery oversubscribed. Children play out, I feel additional traffic and access to the site would result in an accident.</p> <p><i>I do not consider any modification can be made. The proposal should be cancelled, there are more suitable sites where houses could be built.</i></p>	<p>The site is considered to be a suitable housing allocation which meets with the aims of the spatial strategy. Through gathering evidence in support of the Local Plan we have not identified infrastructure issues that would prevent delivery of this number of homes. See Infrastructure Delivery Plan.</p>	No further action
23271 - Mid and South Essex STP (Kerry Harding) [3791]	Support	<p>Anticipated mitigation as a result of development on this site should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs.</p> <p><i>No change proposed</i></p>	<p>The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24308 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Support	<p>The proposed allocation of Land off Stocks Lane as Policy R24 and its removal from the Green Belt is considered sound and is fully supported. It has been established through the evidence base supporting the PSLP that Kelvedon Hatch is a sustainable location to accommodate a modest amount of new houses to contribute to the Borough's housing needs. Indeed, as recognised by para 68 of the NPPF and as a medium sized site, such sites make an important contribution to "meeting the housing requirement of an area and are often built out quickly". We do however have some concerns with the amount of development set out at A of the Policy and the indicative yield at page 340 and the suggested trajectory for the site at Appendix 1. These matters are dealt with below.</p> <p>Supporting these representations is a Vision Document at Appendix A, a review of Green Belt and Landscape Sensitivity at Appendix B and a Summary Drainage and Utility Appraisal at Appendix C. These all confirm that the development at the site is both justified and fully deliverable within the terms of para 67a) of the NPPF. Part A of Policy R24 suggests that there be provision for around 30 new homes on the site. Part A Policy HP03 of the PSLP requires proposals to take a design led approach to density to ensure schemes are sympathetic to local character and make efficient use of land. Part B expects development to achieve a net density of at least 35dph unless the special character of the surrounding area suggests that such densities would be inappropriate. The suggested amount of 30 homes set out for Policy R24 does not currently reflect these requirements or provide an accurate representation of what is achievable on site. 30 homes represent 18.6dph which clearly does not represent an efficient or effective use of the land contrary to the objectives of HP03 and the supporting text set out at 6.18 to 6.20 and 6.22. The Vision Document confirms that around 45 homes can actually be provided on the site representing a far more efficient and effective dwelling yield. 45 homes would represent a density of approximately 28dph. Whilst this does not achieve 35dph, the Vision Document demonstrates that full account has been taken of the objectives of HP03 to ensure that a scheme would be sympathetic to local character. Critically, the illustrative scheme shows</p>	<p>The 30 dwellings on the site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. The Policy would not preclude a development coming forwards that was higher or lower than the dwelling numbers indicated provided it is in conformity with other policies in the plan.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>provision for open space within the site to meet the objectives of Policies HP13 and BE22. These policies provide for functional on-site open space. As such, achieving a greater density would be problematical.</p> <p><i>Policy R24A - substitute 30 new homes with 45 new homes; Page R24 - indicative dwelling yield substitute 30 with 45. At para 9.195 the PSLP suggests the development would take its access from Blackmore Road. This is an error. The paragraph should be amended to refer to Stocks Lane. The site is within the control of Stonebond Properties, a local house builder with considerable experience in the development of medium sized sites, quick delivery and achieving high design and layout standards. Upon removal from the Green Belt and grant of a planning permission, it would be expected that development at the site could commence 2020/21 and be completed within two years of the Plan. As a consequence, it is recommended that the Local Development Plan Housing Trajectory at Appendix 1 is amended to provide for the following based on an increased number of homes as set out in these representations: Year 5 - 2020/21 = 10; Year 6 - 2021/22 = 35.</i></p>		
23228 - Thames Water (On behalf of Thames Water) [1927]	Support	<p>On the information available to date we do not envisage infrastructure concern regarding wastewater network or wastewater treatment infrastructure capability in relation to this sites. Please note that the above comments relate to the sewerage network within the Thames Water supply area only. It is recommended that Anglian Water are also consulted for their comments in relation to this development proposal. Drainage hierarchy to be followed in addressing surface water.</p> <p><i>No change proposed</i></p>	Policy NE06 Flood Risk sets out under part E that where sewerage capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Land north of Woollard Way, Blackmore</i>				
22304 - Mr Stephen Chapman [8245]	Object	<p>Additional planned housing developments in Blackmore will further exacerbate the stresses on Blackmore's already overloaded infrastructure and services and, subsequently, the quality of life of residents.</p> <p>Changes to Plan:</p> <p><i>Brentwood Council should: conduct a 'Housing Need survey' of Blackmore village to demonstrate that the development is justified; demonstrate that no other brownfield sites are available; highway/traffic assessments, flood risk/drainage assessment and detailed ecological surveys should be undertaken. Remove site R25 from the plan</i></p>	<p>Through gathering evidence in support of the Local Plan, the Council has not identified infrastructure issues that would prevent delivery of this number of homes (see Infrastructure Delivery Plan). The housing needs of the borough have been evidenced and the Council is proposing a spatial strategy to meet that need, which includes some development in villages such as Blackmore in order to provide a flexible supply of locations for new development to meet needs, as required by the NPPF (see NPPF paragraph 68). A sequential approach to identifying locations for development has been applied, starting with existing urban areas and brownfield sites. There is not enough urban area/brownfield land to meet development needs, and so the Council has reluctantly considered release of Green Belt to meet those needs. Highways and transport; flood risk and water cycle; landscape and ecology studies have been undertaken and published as part of the Local Plan evidence base, informing policies and site allocations.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23127 - Ms Wendy Cohen [6923]	Object	<p>Additional planned housing developments in Blackmore will further exacerbate the stresses on Blackmore's already overloaded infrastructure and services and, subsequently, the quality of life of residents.</p> <p><i>Brentwood Council should: conduct a 'Housing Need survey' of Blackmore village to demonstrate that the development is justified; demonstrate that no other brownfield sites are available; highway/traffic assessments, flood risk/drainage assessment and detailed ecological surveys should be undertaken.</i></p>	<p>Through gathering evidence in support of the Local Plan, the Council has not identified infrastructure issues that would prevent delivery of this number of homes (see Infrastructure Delivery Plan). The housing needs of the borough have been evidenced and the Council is proposing a spatial strategy to meet that need, which includes some development in villages such as Blackmore in order to provide a flexible supply of locations for new development to meet needs, as required by the NPPF (see NPPF paragraph 68). A sequential approach to identifying locations for development has been applied, starting with existing urban areas and brownfield sites. There is not enough urban area/brownfield land to meet development needs, and so the Council has reluctantly considered release of Green Belt to meet those needs. Highways and transport; flood risk and water cycle; landscape and ecology studies have been undertaken and published as part of the Local Plan evidence base, informing policies and site allocations.</p>	No further action
22487 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified. 3. Effective. 4. Consistent with National Policy. Request insertion of clarification in respect of Floods and SuDS after paragraphs 9.193, 9.196 and 9.200, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Insert following wording as additional paragraph after paragraphs 9.193, 9.196 and 9.200 - The proposed development area is not within areas identified at risk of flooding. It should however be ensured that any development within this area complies with flood risk mitigation measures outlined in the Essex SuDS guide.</i></p>	<p>Policy BE08 Sustainable Drainage will require appropriate consideration of SuDS to avoid any increase in flood risk for all development. Therefore, suggested additional justification text is not considered necessary.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY R25: LAND NORTH OF WOOLLARD WAY</i></b>				
22576 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Object	<p>Policy wording lacks a commitment to deliver biodiversity net gain.</p> <p>The hedgerows should be retained and enhanced, open space should be multifunctional and should include semi natural habitats for the benefit of wildlife. The scheme should deliver a measurable net gain in biodiversity.</p> <p><i>Policy wording should be amended as follows</i>  <i>c. provision for "multifunctional" public open space "to deliver a measurable net gain in biodiversity"</i>  <i>Document is not Sound</i></p>	Noted. No changes proposed to policy but will update Policy NE01 Protecting and Enhancing the Natural Environment in line with the NPPF requirements for securing net gains for biodiversity.	No further action
26572 - Mr & Mrs Gunthardt [8790]	Object	<p>Our objections to the proposed development reflected the general views expressed by our Parish Council and those of a large proportion of the Village population. We feel strongly that the proposed development including the latest revised LDP would negatively impact on the unique character of the Blackmore Village and put undue strain on its already strained infrastructure and services including traffic and parking facilities, access to the local school, lack of adequate medical facilities, flooding etc. We also understand that there are now plans to build a further 70 properties just outside our borough which will cause further strain on the resources and infrastructure of our village. We fully support the efforts and views expressed by our local Parish Council. We trust that you will fully take into account of the views expressed by the residents of our village.</p> <p><i>Remove R25 and R26 from plan</i></p>	Policy HP19 Conservation and Enhancement of Historic Environment requires that all development consider heritage assets, such as conservation areas and local character in the case of Blackmore village. Through gathering evidence in support of the Local Plan, the Council has not identified infrastructure issues that would prevent delivery of the number of homes proposed at site R25 (see Infrastructure Delivery Plan). The housing needs of the borough have been evidenced and the Council is proposing a spatial strategy to meet that need, which includes some development in villages such as Blackmore in order to provide a flexible supply of locations for new development to meet needs, as required by the NPPF (see NPPF paragraph 68).	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22178 - Mr. Chris Hamilton [3835] 22189 - Mrs Helen Whalley [8199] 22190 - Mrs Helen Whalley [8199] 22202 - Mr Anthony Cross [4376] 22244 - Mr Tom Bennett [4388] 22254 - Mr Steve Whalley [4328] 22262 - Mrs Shirley Slade-Bennett [8240] 22622 - Ms Pierina Norman [8290] 22624 - Ms Pierina Norman [8290] 22627 - Ms Pierina Norman [8290] 22636 - Ms Pierina Norman [8290] 22638 - Ms Pierina Norman [8290] 22640 - Ms Gabriella Fickling [8292] 22642 - Ms Gabriella Fickling [8292] 22648 - Ms Gabriella Fickling [8292] 22650 - Ms Gabriella Fickling [8292] 22652 - Ms Gabriella Fickling [8292] 22655 - Ms Gabriella Fickling [8292] 22664 - Cllr. Andrew Watley [4869] 22665 - Cllr. Andrew Watley [4869] 22666 - Cllr. Andrew Watley [4869] 22667 - Cllr. Andrew Watley [4869] 22668 - Cllr. Andrew Watley [4869] 22669 - Cllr. Andrew Watley [4869] 22693 - D. Rawlings [1058] 22711 - Dr Murray Wood [7003] 22712 - Dr Murray Wood [7003] 22714 - Dr Murray Wood [7003] 22716 - Dr Murray Wood [7003] 22718 - Dr Murray Wood [7003] 22722 - Dr Murray Wood [7003] 22729 - Ms Pierina Norman [8290] 22818 - Mr Kenneth Herring	Object	<p>Proposal is damaging to village. Inclusion of site allocations R25 and R26 in the LDP are inappropriate, unsound and not compliant with legal requirements on the following grounds: failure to prove that more suitable (brownfield) sites do not exist in the borough, or that other site allocations couldn't absorb the 70 dwellings proposed; inadequate consultation with adjoining boroughs and failure to properly consider the impact of other nearby developments on Blackmore; failure to recognise the increased flood risk resulting from the proposed development; adverse impact on roads including parking in village centre, noise levels and safety of existing road users from increased traffic; inadequate local amenities/services, impact on local school, already at capacity, GP is full and has long waiting times; impact on wildlife, impact on Green Belt; failed to provide a development strategy for the boroughs northern villages. Need to carry out a local housing need survey in the village. Consider the impact on the historical heritage of the village. Numbers proposed is out of proportion with the size of the existing village. Access roads are unsuitable for more traffic and are liable to flood. Power supply prone to power cuts, sewerage capacity not sufficient, Proposal is not sustainable. There is a lack of employment.</p>	<p>Through gathering evidence in support of the Local Plan, the Council has not identified infrastructure issues that would prevent delivery of this number of homes (see Infrastructure Delivery Plan). The housing needs of the borough have been evidenced and the Council is proposing a spatial strategy to meet that need, which includes some development in villages such as Blackmore in order to provide a flexible supply of locations for new development to meet needs, as required by the NPPF (see NPPF paragraph 68). A sequential approach to identifying locations for development has been applied, starting with existing urban areas and brownfield sites. There is not enough urban area/brownfield land to meet development needs, and so the Council has reluctantly considered release of Green Belt to meet those needs. Transport, flood risk, Green Belt and water cycle; landscape and ecology studies have been undertaken and published as part of the Local Plan evidence base, informing policies and site allocations.</p>	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
[4841] 22820 - Mr Kenneth Herring [4841] 22822 - Mr Kenneth Herring [4841] 22824 - Mr Kenneth Herring [4841] 22826 - Mr Kenneth Herring [4841] 22828 - Mr Kenneth Herring [4841] 22830 - Mr Kenneth Herring [4841] 22852 - Mr Thomas Thwaite [4475] 22853 - Mr Thomas Thwaite [4475] 22854 - Mr Thomas Thwaite [4475] 22855 - Mr Thomas Thwaite [4475] 22856 - Mr Thomas Thwaite [4475] 22857 - Mr Thomas Thwaite [4475] 22858 - Mr Thomas Thwaite [4475] 22859 - Mr Thomas Thwaite [4475] 22860 - Mr Thomas Thwaite [4475] 22861 - Mr Thomas Thwaite [4475] 22879 - Holmes & Hills LLP (Mr Michael Harman) [8074] 22880 - Holmes & Hills LLP (Mr Michael Harman) [8074] 22881 - Holmes & Hills LLP (Mr Michael Harman) [8074] 22882 - Mr Stephen Chapman [8245] 22883 - Mr Stephen Chapman [8245] 22884 - Mr Stephen Chapman [8245] 22916 - Mrs Shirley Slade-				



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
Bennett [8240]				
22918 - Mrs Shirley Slade-				
Bennett [8240]				
22919 - Mrs Shirley Slade-				
Bennett [8240]				
22920 - Mrs Shirley Slade-				
Bennett [8240]				
22921 - Mrs Shirley Slade-				
Bennett [8240]				
22922 - Mrs Shirley Slade-				
Bennett [8240]				
22951 - MR NEIL MILLER [8214]				
22952 - Mrs Helen Whalley [8199]				
22953 - Mrs Helen Whalley [8199]				
22969 - Mr Tom Bennett [4388]				
22970 - Mr Tom Bennett [4388]				
22971 - Mr Tom Bennett [4388]				
22972 - Mr Tom Bennett [4388]				
22973 - Mr Tom Bennett [4388]				
22974 - Mr Tom Bennett [4388]				
22982 - Mr Gary Dimond [7055]				
22991 - Mr Gary Dimond [7055]				
22992 - Mr Gary Dimond [7055]				
22993 - Mr Gary Dimond [7055]				
22994 - Mr Gary Dimond [7055]				
22995 - Mr Gary Dimond [7055]				
22997 - Mr Gary Dimond [7055]				
23002 - Mr Gary Dimond [7055]				
23003 - Mr Gary Dimond [7055]				
23020 - Mrs Ruth Dimond [4851]				
23021 - Mrs Ruth Dimond [4851]				
23022 - Mrs Ruth Dimond [4851]				
23023 - Mrs Ruth Dimond [4851]				
23024 - Mrs Ruth Dimond [4851]				
23027 - Mr Andrew Chambers				
[8300]				
23029 - Mr Andrew Chambers				
[8300]				
23032 - Mr Andrew Chambers				
[8300]				
23035 - Mr Andrew Chambers				
[8300]				
23037 - Mr Andrew Chambers				
[8300]				
23040 - Mr Andrew Chambers				
[8300]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23042 - Mr Andrew Chambers [8300]				
23044 - Miss Emily Dimond [7227]				
23045 - Miss Emily Dimond [7227]				
23046 - Miss Emily Dimond [7227]				
23047 - Miss Emily Dimond [7227]				
23048 - Miss Emily Dimond [7227]				
23049 - Miss Natalie Smith [8301]				
23051 - Miss Emily Dimond [7227]				
23052 - Miss Natalie Smith [8301]				
23054 - Miss Emily Dimond [7227]				
23055 - Miss Natalie Smith [8301]				
23057 - Miss Natalie Smith [8301]				
23060 - Miss Emily Dimond [7227]				
23061 - Miss Natalie Smith [8301]				
23063 - Miss Natalie Smith [8301]				
23065 - Miss Natalie Smith [8301]				
23067 - Miss Emily Dimond [7227]				
23068 - Miss Emily Dimond [7227]				
23070 - Mr Sonny Smith [8302]				
23072 - Mr Sonny Smith [8302]				
23076 - Mr Sonny Smith [8302]				
23078 - Mr Sonny Smith [8302]				
23080 - Mr Sonny Smith [8302]				
23082 - Mr Sonny Smith [8302]				
23085 - Mr Sonny Smith [8302]				
23097 - Mrs Sophia Severn [4876]				
23099 - Mrs Sophia Severn [4876]				
23101 - Mrs Sophia Severn [4876]				
23128 - Ms Wendy Cohen [6923]				
23129 - Ms Wendy Cohen [6923]				
23131 - Ms Wendy Cohen [6923]				
23132 - Ms Wendy Cohen [6923]				
23145 - Mr Kevin Wood [6965]				
23147 - Mr Kevin Wood [6965]				
23149 - Mr Kevin Wood [6965]				
23151 - Mr Kevin Wood [6965]				
23314 - Mr John Riley [4905]				
23316 - Mr John Riley [4905]				
23318 - Mr John Riley [4905]				
23320 - Mr John Riley [4905]				
23322 - Mr John Riley [4905]				
23324 - Mr John Riley [4905]				
23326 - Mr John Riley [4905]				
23328 - Mr John Riley [4905]				
23330 - Mr John Riley [4905]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23333 - Mr John Riley [4905]				
23335 - Mrs Danielle Cohen [8313]				
23358 - Ms Dawn Ireland [4861]				
23359 - Ms Janet Parris [8315]				
23362 - Ms Dawn Ireland [4861]				
23363 - Ms Janet Parris [8315]				
23366 - Mr. Peter Shipton [289]				
23368 - Mr Stephen Allington [8316]				
23370 - Mr. Peter Shipton [289]				
23371 - Mr Stephen Allington [8316]				
23372 - Mr. Peter Shipton [289]				
23376 - Mr. Peter Shipton [289]				
23378 - Mr. Peter Shipton [289]				
23380 - Mr. Peter Shipton [289]				
23387 - Ms Dawn Ireland [4861]				
23389 - Miss Heather Jones [8318]				
23390 - Miss Heather Jones [8318]				
23391 - Miss Heather Jones [8318]				
23392 - Miss Heather Jones [8318]				
23393 - Miss Heather Jones [8318]				
23394 - Miss Heather Jones [8318]				
23395 - Miss Heather Jones [8318]				
23396 - Miss Heather Jones [8318]				
23397 - Miss Heather Jones [8318]				
23398 - Miss Heather Jones [8318]				
23399 - Ms Dawn Ireland [4861]				
23412 - Ms Dawn Ireland [4861]				
23430 - Mr Benjamin Rumary [8324]				
23452 - Ms Christine Durdant-Pead [8117]				
23454 - Ms Christine Durdant-Pead [8117]				

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23456 - Ms Christine Durdant-Pead [8117]				
23458 - Ms Christine Durdant-Pead [8117]				
23460 - Ms Christine Durdant-Pead [8117]				
23462 - Ms Christine Durdant-Pead [8117]				
23464 - Ms Christine Durdant-Pead [8117]				
23466 - Ms Christine Durdant-Pead [8117]				
23468 - Ms Christine Durdant-Pead [8117]				
23470 - Mr Marc Cohen [4268]				
23476 - Ms Leanne Hartley [8325]				
23478 - Ms Leanne Hartley [8325]				
23480 - Ms Leanne Hartley [8325]				
23482 - Ms Leanne Hartley [8325]				
23484 - Ms Leanne Hartley [8325]				
23486 - Ms Leanne Hartley [8325]				
23488 - Ms Leanne Hartley [8325]				
23490 - Ms Leanne Hartley [8325]				
23492 - Ms Leanne Hartley [8325]				
23494 - Ms Leanne Hartley [8325]				
23496 - Ms Leanne Hartley [8325]				
23498 - Ms Leanne Hartley [8325]				
23500 - Ms Leanne Hartley [8325]				
23502 - Ms Leanne Hartley [8325]				
23504 - Mr Richard Thwaite [6964]				
23506 - Mr Richard Thwaite [6964]				
23508 - Mr Richard Thwaite [6964]				
23510 - Mr Richard Thwaite [6964]				
23512 - Mr Richard Thwaite [6964]				
23514 - Mr Richard Thwaite [6964]				
23516 - Mr Richard Thwaite [6964]				
23518 - Mr Richard Thwaite [6964]				
23520 - Mr Richard Thwaite				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
[6964] 23521 - Mr Richard Thwaite [6964] 23522 - Mr Richard Thwaite [6964] 23526 - Mr Richard Thwaite [6964] 23528 - Mr Richard Thwaite [6964] 23530 - Mr Richard Thwaite [6964] 23531 - Mr Gary Durdant-Pead [8326] 23534 - Mr Gary Durdant-Pead [8326] 23535 - Mr Gary Durdant-Pead [8326] 23536 - Mr Gary Durdant-Pead [8326] 23538 - Mr Gary Durdant-Pead [8326] 23541 - Mr David Barfoot [7177] 23548 - Mrs Janet Barfoot [7200] 23550 - Mr Gary Durdant-Pead [8326] 23552 - Mr Gary Durdant-Pead [8326] 23555 - Mr Gary Durdant-Pead [8326] 23556 - Mr Gary Durdant-Pead [8326] 23561 - Ms Eleanora Barfoot [8328] 23565 - Mrs Hayley Hammond [8329] 23576 - Sadie Barfoot [8330] 23628 - Mr Michael Evans [8332] 23763 - Mr. David Cartwright [7193] 23766 - Mr. David Cartwright [7193] 23768 - Mr. David Cartwright [7193] 23771 - Mr. David Cartwright [7193] 23773 - Mr. David Cartwright				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
[7193] 23775 - Mr. David Cartwright [7193] 23941 - Mrs Trina Chambers [8348] 24097 - Ms Julie Chandler [8352] 24195 - Mrs. Margaret Cartwright [7195] 24201 - Mrs. Margaret Cartwright [7195] 24207 - Mrs. Margaret Cartwright [7195] 24213 - Mrs. Margaret Cartwright [7195] 24219 - Mrs. Margaret Cartwright [7195] 24225 - Mr Callum Cartwright [8370] 24231 - Mr Callum Cartwright [8370] 24237 - Mr Callum Cartwright [8370] 24243 - Mr Callum Cartwright [8370] 24342 - Mr Michael Haynes [8138] 24344 - Mr Michael Haynes [8138] 24345 - Mr Michael Haynes [8138] 24346 - Mr Michael Haynes [8138] 24348 - Mr Michael Haynes [8138] 24349 - Mr Michael Haynes [8138] 24350 - Mr Michael Haynes [8138] 24351 - Mr Michael Haynes [8138] 24352 - Mr Michael Haynes [8138] 24353 - Mr Michael Haynes [8138] 24354 - Mr Michael Haynes [8138] 24373 - Mr Jack Emmett [8372] 24375 - Mr Jack Emmett [8372] 24377 - Mr Jack Emmett [8372] 24379 - Mr Jack Emmett [8372] 24381 - Mr Jack Emmett [8372] 24384 - Mr John Fowles [8373] 24389 - Mr John Fowles [8373] 24391 - Mr John Fowles [8373] 24394 - Mr John Fowles [8373] 24399 - Dr. S.J. Jennings [1497] 24401 - Dr. S.J. Jennings [1497]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24402 - Dr. S.J. Jennings [1497]				
24403 - Dr. S.J. Jennings [1497]				
24405 - Dr. S.J. Jennings [1497]				
24407 - Dr. S.J. Jennings [1497]				
24409 - Dr. S.J. Jennings [1497]				
24411 - Dr. S.J. Jennings [1497]				
24413 - Dr. S.J. Jennings [1497]				
24415 - Dr. S.J. Jennings [1497]				
24417 - Dr. S.J. Jennings [1497]				
24419 - Miss Nicky Joiner [8374]				
24422 - Miss Nicky Joiner [8374]				
24424 - Mr Kevin Joyner [8375]				
24425 - Mr Kevin Joyner [8375]				
24426 - Mr Kevin Joyner [8375]				
24443 - Mrs Vicky Mumby [8378]				
24445 - Mrs Vicky Mumby [8378]				
24447 - Mrs Vicky Mumby [8378]				
24449 - Mrs Vicky Mumby [8378]				
24451 - Mrs Vicky Mumby [8378]				
24461 - Mr Mark Mumby [8379]				
24463 - Mr Mark Mumby [8379]				
24465 - Mr Mark Mumby [8379]				
24467 - Mr Mark Mumby [8379]				
24470 - Mr Mark Mumby [8379]				
24474 - Mr Frederick Piper [8380]				
24476 - Mr Frederick Piper [8380]				
24478 - Mr Frederick Piper [8380]				
24482 - Mrs Eileen Piper [8381]				
24484 - Mrs Eileen Piper [8381]				
24485 - Mrs Eileen Piper [8381]				
24489 - Mrs Eileen Piper [8381]				
24490 - Mrs Eileen Piper [8381]				
24494 - Mr Albert Pardoe [8002]				
24498 - Mr Richard Reed [4708]				
24501 - Dr Belinda Dunbar [8382]				
24506 - Mr Peter Robinson [4899]				
24507 - Danielle Keys [8376]				
24514 - Mrs Terri Reed [4303]				
24516 - Mrs Jean Drew [8383]				
24518 - Mr Andrew Dawson [8385]				
24520 - Mrs Irene Saunders [8386]				
24522 - Ms Pauline Davidson [6327]				
24525 - Mr Ross Davidson [8389]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24526 - Mr Ross Davidson [8389]				
24528 - Mrs Diane Smith [8388]				
24530 - Mrs Diane Smith [8388]				
24532 - Mrs Diane Smith [8388]				
24534 - Mrs Diane Smith [8388]				
24536 - Mrs Diane Smith [8388]				
24538 - Mrs Diane Smith [8388]				
24540 - Mrs Tracey Dawson [8390]				
24542 - Mrs Lorna Mitchell [8391]				
24547 - Mr Paul De Rosa [8393]				
24549 - Mr Philip Dow [8394]				
24551 - Mrs Anne Davies [8395]				
24556 - Mrs Angela Taylor [8392]				
24558 - Mrs Angela Taylor [8392]				
24560 - Mrs Angela Taylor [8392]				
24562 - Mrs Angela Taylor [8392]				
24564 - Mrs Angela Taylor [8392]				
24566 - Mrs Angela Taylor [8392]				
24568 - Mrs Angela Taylor [8392]				
24570 - Mrs Angela Taylor [8392]				
24573 - Mrs Marion Woolaston [8397]				
24575 - Mr Peter Davies [8396]				
24581 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]				
24583 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]				
24585 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]				
24587 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]				
24589 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]				
24591 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]				
24593 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]				
24595 - Blackmore Village				



<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
Heritage Association (Mr William Ratcliffe) [4874] 24597 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874] 24599 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874] 24600 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874] 24601 - Mr Ronald Saunders [8384] 24603 - Mr Anthony Walker [8401] 24605 - Mr John Warner [5018] 24607 - Mr David Wade [8402] 24613 - Mr Pete Vince [8123] 24618 - Mr Lyall Vince [8403] 24623 - Mrs Tina Wilding [8405] 24625 - Terence Dearlove [8404] 24632 - Mr Nicholas Wilkinson [8406] 24634 - Mrs Margaret Wiltshire [7141] 24637 - Giovanni De Domonocos [8407] 24641 - Mr Colin Wilding [8409] 24644 - Mrs Alexandre De Dominicis [6951] 24646 - John Drain [8410] 24648 - Jennifer Drain [8412] 24654 - Mrs Karen Wood [8411] 24657 - Mrs Karen Wood [8411] 24659 - Mrs Ruth Wade [8413] 24665 - Mrs Edna Williams [4728] 24666 - Mr Mark Wisdom [8414] 24675 - Mr Eric John Webb [1830] 24679 - Ms Shirley Dearlove [8415] 24681 - Mrs Helen Haynes [8416] 24685 - Mrs Patricia Dillon [8417] 24687 - Mr Dennis Trumble [8418] 24689 - Mrs Elizabeth Thompson [5016] 24691 - Mr Stuart Townsend				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
[8419] 24696 - Mr Desmond Temple [8420] 24698 - Miss Yasmin Tossun [8421] 24700 - Mrs Susan Tossun [8422] 24702 - Mr. Gurpal Singh Dhesi [7270] 24704 - Mrs. Bhupinder Dhesi [7269] 24706 - Mr. Gurpreet Dhesi [7268] 24708 - Mr Stuart Lucas [4956] 24710 - Mr Frank Tabor [8424] 24712 - Mr Shefik Tossun [8425] 24714 - Anna Dunk [8426] 24718 - Mrs Christine Tabor [8427] 24720 - Mrs Karen Tomey [8428] 24722 - Mrs Elisabeth Taylor [2918] 24724 - Miss Chloe Taylor [8429] 24726 - Mr James Taylor [8430] 24728 - Mr Steven Taylor [8431] 24734 - Mr Stephen Downton [8432] 24735 - Mrs Jasdeep Dhesi [7266] 24737 - Mrs Patricia Dean [8434] 24740 - Barry Robert Dean [8435] 24743 - Mr Joe Emmett [8436] 24745 - Mrs Paula Tregent [8433] 24747 - Mr Paul Tregent [8437] 24750 - Miss Harriet Davis [8440] 24752 - Samantha Dunk [8438] 24753 - Mrs Kathleen Trumble [5029] 24754 - Mr Edward Davis [8441] 24757 - Mr Robert Davis [4789] 24759 - Mr Raymond Thompson [4840] 24761 - Ms. Donna Toomey [8024] 24763 - Ann Davis [4404] 24770 - Mrs Angela Taylor [8442] 24773 - Mr John Dawson [8444]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24775 - Mr John Dawson [8444]				
24777 - Mr John Dawson [8444]				
24779 - Mr John Dawson [8444]				
24781 - Mr John Dawson [8444]				
24783 - Mr Alan Dodd [4828]				
24785 - MR David Emmett [8445]				
24792 - Mrs Deborah Thwaite [8175]				
24794 - Ms Jennifer Emmett [4896]				
24796 - Miss Donna Taylor [8446]				
24798 - Catherine Elliott [8447]				
24800 - Mr Colin Tomey [8448]				
24801 - Mr Colin Tomey [8448]				
24802 - Heather Eltham [8449]				
24806 - Ms Patricia Taylor [6880]				
24808 - Ms Patricia Taylor [6880]				
24810 - Ms Patricia Taylor [6880]				
24812 - Ms Patricia Taylor [6880]				
24814 - Kirsty Edwards [8450]				
24820 - Mrs Susan Webb [4919]				
24825 - Mr Adrian Quick [8451]				
24831 - Mr Ronald Quested [8452]				
24833 - Mrs Cynthia Kirby [8453]				
24835 - Mr David Kirby [8454]				
24838 - Mrs Clare Forstner [4847]				
24840 - Donna Eaton [8455]				
24843 - Mrs Clare Forstner [4847]				
24845 - Mrs Clare Forstner [4847]				
24847 - Mrs Clare Forstner [4847]				
24849 - Mrs Clare Forstner [4847]				
24851 - Mr Scott Osborne [8456]				
24853 - Mrs Beryl Fox [8457]				
24855 - Mrs Beryl Fox [8457]				
24859 - Mrs Faye Osborne [8458]				
24861 - Mrs Ceri Fisher [8459]				
24863 - Mrs Ceri Fisher [8459]				
24865 - Mrs Ceri Fisher [8459]				
24867 - Mrs Ceri Fisher [8459]				
24869 - Mrs Ceri Fisher [8459]				
24870 - Mr David Olley [8461]				
24873 - Mrs Gemma Olley [8462]				
24875 - Mr Dane Fullick [8463]				
24877 - Mr Dane Fullick [8463]				
24880 - Mr Dane Fullick [8463]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24881 - Mr Dane Fullick [8463]				
24883 - Mr Marcus Forstner [8160]				
24885 - Mr Marcus Forstner [8160]				
24887 - Mr Marcus Forstner [8160]				
24890 - Mrs Michelle Fullick [8464]				
24892 - Mrs Michelle Fullick [8464]				
24894 - Mrs Michelle Fullick [8464]				
24896 - Mrs Michelle Fullick [8464]				
24899 - Mrs Michelle Fullick [8464]				
24901 - Mrs Michelle Fullick [8464]				
24903 - Mrs Michelle Fullick [8464]				
24905 - Miss Autumn Fullick [8466]				
24909 - Jacqueline Greagsby [8465]				
24910 - Miss Autumn Fullick [8466]				
24914 - Miss Autumn Fullick [8466]				
24915 - Miss Autumn Fullick [8466]				
24917 - Mr Lee Fullick [8467]				
24919 - Mr Lee Fullick [8467]				
24921 - Mr Lee Fullick [8467]				
24923 - Mr Lee Fullick [8467]				
24925 - Mr Lee Fullick [8467]				
24928 - Kay Ginivan [8468]				
24931 - Mrs Susie Finlay [5892]				
24933 - Mrs Susie Finlay [5892]				
24935 - Mrs Susie Finlay [5892]				
24937 - Mrs Susie Finlay [5892]				
24939 - Mrs Susie Finlay [5892]				
24941 - Mrs Susie Finlay [5892]				
24944 - Mr Andrew Finlay [8191]				
24946 - Mr Andrew Finlay [8191]				
24948 - Mr Andrew Finlay [8191]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24950 - Mr Andrew Finlay [8191]				
24952 - Mr Andrew Finlay [8191]				
24954 - Mr Andrew Finlay [8191]				
24956 - Mrs Grace Furnell [8182]				
24958 - Mrs Grace Furnell [8182]				
24960 - Mrs Grace Furnell [8182]				
24962 - Mrs Grace Furnell [8182]				
24964 - Mrs Grace Furnell [8182]				
24965 - Mrs Grace Furnell [8182]				
24968 - Mrs Grace Furnell [8182]				
24970 - Mrs Lesley Fletcher [8469]				
24973 - Mrs Lesley Fletcher [8469]				
24974 - Mrs Lesley Fletcher [8469]				
24976 - Mrs Lesley Fletcher [8469]				
24978 - Mr Christoper Fletcher [8470]				
24979 - Mr Christoper Fletcher [8470]				
24982 - Mr Christoper Fletcher [8470]				
24984 - Mr Christoper Fletcher [8470]				
24986 - Edwin Fisher [1189]				
24988 - Edwin Fisher [1189]				
24989 - Edwin Fisher [1189]				
24992 - Edwin Fisher [1189]				
24994 - Mrs Aileen Fisher [8471]				
24996 - Mrs Aileen Fisher [8471]				
24998 - Mrs Aileen Fisher [8471]				
25000 - Mr Leslie Smith [8472]				
25003 - Ms Doreen Greenshields [8460]				
25005 - Mr John Ginivan [8476]				
25008 - Ms Rebecca Edwards [8477]				
25010 - Miss Claire Grant [8478]				
25016 - Mr Christopher Sanders [8474]				
25018 - Mrs Jacqueline Frost [8479]				
25020 - Mr Richard Fisher [8480]				
25021 - Mr Richard Fisher [8480]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25022 - Mr Richard Fisher [8480]				
25023 - Mr Richard Fisher [8480]				
25024 - Mr Richard Fisher [8480]				
25030 - Ms Victoria Sanders [8482]				
25034 - Mrs Karen Geary [8483]				
25038 - Ms Jill Griffiths [5024]				
25040 - Mrs Karen Geary [8483]				
25042 - Mrs Karen Geary [8483]				
25044 - Mrs Karen Geary [8483]				
25046 - Mrs Karen Geary [8483]				
25047 - Mr Alan Snook [8484]				
25052 - Mrs Karen Geary [8483]				
25054 - Mrs Karen Geary [8483]				
25056 - Mrs Sandra Eaton [8486]				
25059 - Ruth Jones [8485]				
25063 - Mr Steven Jacobs [4408]				
25065 - Ms Sylvia Pascoe [7953]				
25069 - Diane Jones [8488]				
25073 - Mrs Josephine Snook [8489]				
25075 - Mrs Alison Goddard-King [8490]				
25077 - Mrs Alison Goddard-King [8490]				
25079 - Mrs Alison Goddard-King [8490]				
25081 - Mrs Alison Goddard-King [8490]				
25083 - Mr David Greagsby [8491]				
25085 - Mr David Greagsby [8491]				
25088 - Mr David Greagsby [8491]				
25089 - Mr David Greagsby [8491]				
25091 - Mr Christopher Gill [8492]				
25093 - Mr Christopher Gill [8492]				
25095 - Mrs Joanne Gill [4758]				
25097 - Mrs Joanne Gill [4758]				
25099 - Mrs Joanne Gill [4758]				
25101 - Mrs Joanne Gill [4758]				
25103 - Mrs Joanne Gill [4758]				
25105 - Mrs Joanne Gill [4758]				
25107 - Mr Keith Godbee [4942]				
25110 - Mr Keith Godbee [4942]				
25112 - Mr Keith Godbee [4942]				
25114 - Mr Keith Godbee [4942]				
25116 - Mr Keith Godbee [4942]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25119 - Mr Bruno Giordan [8104]				
25121 - Mr Bruno Giordan [8104]				
25123 - Valerie Godbee [4943]				
25126 - Valerie Godbee [4943]				
25128 - Valerie Godbee [4943]				
25130 - Valerie Godbee [4943]				
25132 - Valerie Godbee [4943]				
25133 - Brenda Juniper [8493]				
25136 - Valerie Godbee [4943]				
25138 - Valerie Godbee [4943]				
25140 - Valerie Godbee [4943]				
25142 - Valerie Godbee [4943]				
25144 - Valerie Godbee [4943]				
25146 - Mr Paul David Jackson [7387]				
25148 - Mr Terry Geary [8494]				
25151 - Mr Terry Geary [8494]				
25153 - Mr Terry Geary [8494]				
25155 - Mr Terry Geary [8494]				
25156 - Mr Terry Geary [8494]				
25157 - Iris Jones [8495]				
25162 - Mr Terry Geary [8494]				
25164 - Mr Paul Gardiner [5703]				
25166 - Mr Paul Gardiner [5703]				
25168 - Mr Paul Gardiner [5703]				
25170 - Mr Paul Gardiner [5703]				
25172 - Mr Paul Gardiner [5703]				
25174 - Mr Paul Gardiner [5703]				
25176 - Mrs Jacqueline Lawrenson [8496]				
25178 - Mrs Jacqueline Lawrenson [8496]				
25180 - Mrs Jacqueline Lawrenson [8496]				
25182 - Mrs Jacqueline Lawrenson [8496]				
25184 - Mrs Jacqueline Lawrenson [8496]				
25185 - Mrs Jacqueline Lawrenson [8496]				
25186 - Mrs Jacqueline Lawrenson [8496]				
25188 - Mrs Jacqueline Lawrenson [8496]				
25190 - Mr Thomas Lennon [747]				
25192 - Mr Thomas Lennon [747]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25195 - Mr Thomas Lennon [747]				
25196 - Mr Thomas Lennon [747]				
25198 - Mrs Rose Linton [8497]				
25200 - Mrs Rose Linton [8497]				
25202 - Mr Terry Mander [4562]				
25204 - Mrs Rose Linton [8497]				
25206 - Mrs Rose Linton [8497]				
25208 - Mrs Rose Linton [8497]				
25210 - Mrs Jackie Locke [8498]				
25212 - Mrs Jackie Locke [8498]				
25214 - Mrs Jackie Locke [8498]				
25216 - Mrs Jackie Locke [8498]				
25218 - Mrs Jackie Locke [8498]				
25220 - Mrs Jackie Locke [8498]				
25222 - Mrs Jackie Locke [8498]				
25224 - Mrs Kim Lucas [4711]				
25226 - Mrs Kim Lucas [4711]				
25228 - Mrs Kim Lucas [4711]				
25230 - Mrs Kim Lucas [4711]				
25232 - Mrs Kim Lucas [4711]				
25234 - Mrs Margaret Laing [7046]				
25236 - Mrs Margaret Laing [7046]				
25238 - Mrs Margaret Laing [7046]				
25240 - Mrs Margaret Laing [7046]				
25242 - Mrs Margaret Laing [7046]				
25244 - Mrs Margaret Laing [7046]				
25245 - Mrs Margaret Laing [7046]				
25247 - Mrs Margaret Laing [7046]				
25249 - Mrs Margaret Laing [7046]				
25251 - Mrs Margaret Laing [7046]				
25254 - Mrs Margaret Laing [7046]				
25256 - Mrs Margaret Laing [7046]				
25259 - Mrs Margaret Laing [7046]				



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25261 - Mr John Laing [8501]				
25262 - Mrs Michelle Morgan [4505]				
25265 - Mr John Laing [8501]				
25267 - Mr John Laing [8501]				
25269 - Mr John Laing [8501]				
25271 - Mr John Laing [8501]				
25273 - Mr John Laing [8501]				
25275 - Mr John Laing [8501]				
25277 - Mr John Laing [8501]				
25279 - Mr John Laing [8501]				
25281 - Mr John Laing [8501]				
25283 - Mr John Laing [8501]				
25285 - Mr John Laing [8501]				
25287 - Mr John Laing [8501]				
25290 - Mrs Doreen Larney [8502]				
25292 - Mrs Doreen Larney [8502]				
25294 - Mrs Doreen Larney [8502]				
25297 - Mrs Doreen Larney [8502]				
25298 - Mrs Doreen Larney [8502]				
25300 - Mrs Doreen Larney [8502]				
25302 - Mrs Doreen Larney [8502]				
25304 - Mr Alfred Larney [4990]				
25306 - Mr Alfred Larney [4990]				
25308 - Mr Alfred Larney [4990]				
25310 - Mr Alfred Larney [4990]				
25312 - Mr Alfred Larney [4990]				
25314 - Mrs Alison Lester [8503]				
25316 - Mrs Alison Lester [8503]				
25318 - Mrs Alison Lester [8503]				
25320 - Mrs Alison Lester [8503]				
25323 - Mrs Alison Lester [8503]				
25324 - Mrs Alison Lester [8503]				
25326 - Mrs Alison Lester [8503]				
25328 - Mrs Nicola Lester [8504]				
25330 - Mrs Nicola Lester [8504]				
25332 - Mrs Nicola Lester [8504]				
25334 - Mrs Nicola Lester [8504]				
25336 - Mrs Nicola Lester [8504]				
25338 - Mrs Nicola Lester [8504]				
25340 - Mrs Nicola Lester [8504]				
25342 - Mr Graham Lawrenson [6958]				
25344 - Mr Graham Lawrenson [6958]				
25347 - Mr Graham Lawrenson				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
[6958] 25349 - Mr Graham Lawrenson [6958] 25350 - Mr Graham Lawrenson [6958] 25352 - Mr Graham Lawrenson [6958] 25355 - Mr Graham Lawrenson [6958] 25356 - Mr Graham Lawrenson [6958] 25358 - Mr Graham Lawrenson [6958] 25360 - Mr Graham Lawrenson [6958] 25362 - - Neil Stainer [2334] 25363 - Mr Christopher Blackwell [8505] 25366 - Mr Christopher Blackwell [8505] 25368 - Mr Christopher Blackwell [8505] 25370 - Mr Christopher Blackwell [8505] 25372 - Mr Christopher Blackwell [8505] 25376 - Mr Christopher Blackwell [8505] 25378 - Mr Christopher Blackwell [8505] 25380 - Mrs Paula Lennon [8506] 25381 - Mr Gary Sanders [4923] 25384 - Mr Paul Sullivan [8507] 25386 - Mrs Debbie Spencer [6959] 25388 - Mrs Anne Stockman [8508] 25390 - Mrs Paula Lennon [8506] 25392 - Mrs Paula Lennon [8506] 25394 - Mrs Paula Lennon [8506] 25397 - Mrs Debbie Stevens [8509] 25403 - Mr Craig Stevens [4958] 25407 - Mrs Malanie Sanders [8511] 25409 - Mr John and Maureen				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
Murrell [6846] 25411 - Mr William A Smith [8512] 25414 - Mr John and Maureen Murrell [6846] 25416 - Mr John and Maureen Murrell [6846] 25418 - Mr David Smith [4872] 25420 - Mr John and Maureen Murrell [6846] 25422 - Mr John and Maureen Murrell [6846] 25424 - Mr Bryan Moreton [8513] 25429 - Mrs Anne Sands [8514] 25431 - Mrs Gloria Moreton [8515] 25433 - Mrs Karen Sullivan [8516] 25435 - Mr Stephen Murrell [8517] 25437 - Miss Wendy Schweitzer [8518] 25439 - Mrs Lorraine Murrell [8519] 25441 - Mr Sean Moore [8520] 25443 - Mr Sean Moore [8520] 25446 - Mrs Shui-Lin Moore [8521] 25447 - Mr Graham Martin [8522] 25451 - Hazel Mills [8523] 25455 - Edward Mills [8524] 25458 - Mr Anthony Nicholson [4709] 25461 - Doddinghurst Infant School (Ms. Ingrid Nicholson) [4339] 25465 - Mr Terry Sands [8525] 25467 - Mr Gary Staples [8526] 25469 - Mrs Jane Staples [8527] 25471 - Mrs Margaret Saxton [4882] 25473 - Mr David Saxton [4286] 25475 - Mr M. Skidmore [1160] 25477 - Mrs Elaine Stares [8528] 25479 - Mrs Lesley Stone [8529] 25481 - Mrs Debbie Martin [8530] 25483 - Mrs Diane Mills [8533] 25485 - Mr Peter Mills [6982] 25487 - Mrs Lorraine Mitchell [8534] 25489 - Mr Steve Mitchell [8535]				

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
25491 - Stuart Moulder [4713]				
25493 - Mrs Carol Moulder [4719]				
25495 - Mrs Hilery Morse [8536]				
25497 - Mr Frank Stone [8538]				
25501 - Mrs Melanie Simpson [8539]				
25508 - Mrs Gladys Skinner [8540]				
25510 - Mr Peter Snelling [6960]				
25512 - Miss Carole Scott [8541]				
25514 - Mr Kenneth Sexton [4860]				
25516 - Mrs June Sexton [8542]				
25518 - Miss Faye McCarthy [8543]				
25520 - Mr Terence Stenning [8544]				
25522 - Mr Chris McGovern [8545]				
25523 - Mrs Ann Stenning [8546]				
25526 - Mrs Melanie Snelling [8547]				
25528 - Mrs Francesca McCarthy [8548]				
25534 - Mr. James Simpson [4462]				
25536 - Mr Tony Severn [8550]				
25541 - Mrs Gillian Romang [8107]				
25543 - Mrs Pauline Roberts [8551]				
25548 - Mrs Alison Ratcliffe [5040]				
25553 - Mr Richard Romang [6974]				
25555 - Mr Andrew Rothery [8552]				
25560 - Mrs Brigid Robinson [4897]				
25562 - Mrs Susan Rayner [8553]				
25564 - Mr Hugh Rayner [8011]				
25566 - Mr Lyn Robbins [8554]				
25568 - Mrs Lisa Rawlings [8555]				
25570 - Mr Geoffrey Rose [8556]				
25572 - Mrs Rosalind Rose [8557]				
25574 - Mrs Patricia Mountstevens [8559]				
25576 - Mr Gerald Mountstevens				

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
[4911]				
25578 - Mr John Richardson				
[4858]				
25580 - Mr Neil Ratcliff [8561]				
25582 - Mr Peter Ryan [4937]				
25587 - Mr Simon Richardson				
[8562]				
25593 - Mr Clive Rosewell [8563]				
25595 - Mr Nicholas Rogers				
[8564]				
25600 - Mr Matthew Romang				
[8565]				
25606 - Mr David Rolfs [8566]				
25612 - Mrs Yvonne Rolfs [8567]				
25614 - Mrs Maureen Murrell				
[8560]				
25617 - Mr Brian Marchant [8569]				
25624 - Blackmore Village				
Heritage Association (Mr William				
Ratcliffe) [4874]				
25631 - Blackmore, Hook End				
and Wyatts Green Parish Council				
(Parish Clerk) [1921]				
25633 - Blackmore, Hook End				
and Wyatts Green Parish Council				
(Parish Clerk) [1921]				
25635 - Blackmore, Hook End				
and Wyatts Green Parish Council				
(Parish Clerk) [1921]				
25638 - Blackmore, Hook End				
and Wyatts Green Parish Council				
(Parish Clerk) [1921]				
25639 - Blackmore, Hook End				
and Wyatts Green Parish Council				
(Parish Clerk) [1921]				
25641 - Blackmore, Hook End				
and Wyatts Green Parish Council				
(Parish Clerk) [1921]				
25648 - Blackmore, Hook End				
and Wyatts Green Parish Council				
(Parish Clerk) [1921]				
25651 - Blackmore, Hook End				
and Wyatts Green Parish Council				
(Parish Clerk) [1921]				
25653 - Blackmore, Hook End				
and Wyatts Green Parish Council				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
(Parish Clerk) [1921] 25654 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921] 25655 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921] 25657 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921] 25659 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921] 25664 - Mrs Hazel Newcombe [8597] 25668 - Mr Colin Newcombe [8598] 25673 - Miss Charlotte Newton [8599] 25677 - Mrs Tina Newton [8600] 25679 - Mr Stephen Newton [8601] 25681 - Mrs Joan Marchant [8602] 25683 - Mrs Lesley Moss [7053] 25686 - Mr and Mrs Brian and Lesley Moss [2905] 25687 - Mr Barry Monery [8004] 25689 - Miss Jean Monery [8007] 25691 - Mrs Fleur Morgan [4848] 25698 - Mr Mark Morgan [4987] 25700 - Mr & Mrs John & Linda Hornett [8604] 25702 - Mr Alan Moody [1825] 25704 - Mr Colin Miers [3959] 25706 - Mrs Gillian Mass [8605] 25708 - Mass and Co (Mr John Mass) [3669] 25714 - Mrs Caroline Parkin [8606] 25716 - Mrs Jill Pritchard [4269] 25718 - Miss Lisa Philips [8607] 25720 - Mr Hylton Palmer [8154] 25722 - Mrs. June Palmer [3739] 25724 - Mrs Julie Pounds [8608] 25726 - Mr Darryl Pounds [8609] 25728 - Mrs Irene Power [8610]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25731 - Mr Terence Power [8611]				
25732 - Mrs Beth Pardoe [8613]				
25734 - Mrs Janet Pincombe [8614]				
25736 - Mrs Carol Poulton [8119]				
25738 - Mr Stephen Poulton [8149]				
25740 - Ms Judith Phillips [8615]				
25742 - Mr Douglas Piper [603]				
25745 - Lloyd Piper [8616]				
25747 - Mrs Kay Parkinson [4599]				
25749 - Mrs Kay Parkinson [4599]				
25753 - Mr Christopher Parkinson [8617]				
25756 - Mr Christopher Parkinson [8617]				
25757 - Mr Michael Pegram [8618]				
25759 - Mr Christopher Parkin [8619]				
25761 - Mr Peter Pritchard [8620]				
25763 - Mr Andrew Pallet [1313]				
25765 - Mr Vessenin Paounov [8621]				
25767 - Mr David Pegram [8622]				
25769 - Ms Paula Pegram [8625]				
25771 - Mr James Pegram [8626]				
25773 - Mrs Tracy Goddard-King [8627]				
25775 - Ms Tina Harrington [4779]				
25777 - Ms Tina Harrington [4779]				
25779 - Ms Tina Harrington [4779]				
25781 - Ms Tina Harrington [4779]				
25783 - Ms Tina Harrington [4779]				
25785 - Mr Andrew Harris [8628]				
25791 - Mrs Pamela Bailey [8010]				
25805 - Mr Neil O'Riordan [8630]				
25806 - Mrs Mandy Hamilton [8633]				
25808 - Miss Lois Hamilton [8632]				
25810 - Mr Max Hamilton [8631]				
25814 - Mr Graham Hesketh [8634]				
25816 - Mrs Carol Holmes [4693]				
25825 - Miss Jade Hayes [8136]				
25836 - Lisa Houston [8636]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25845 - Mr John Hughes [4500]				
25852 - Mr Thomas Hughes [8637]				
25859 - Mrs Gail Hughes [8638]				
25866 - Mr Adam Hughes [8639]				
25871 - Mrs Sara Harris [8122]				
25873 - Mr Patrick Hinchin [6750]				
25875 - Mr Anthony Helliard [8640]				
25877 - MR ALAN BOWLAND [8121]				
25879 - Mrs Judith Bowland [8642]				
25881 - Mr Allan Hilliard [8641]				
25883 - Mr Ray Brooks [8643]				
25885 - Ms Kay Hewitt [8644]				
25887 - Miss Alison Bell [8646]				
25888 - Mrs Barbara Head [8645]				
25891 - Mr Dennis Holla [8647]				
25893 - Mr Andrew Borton [8648]				
25895 - Mr David Bennett [8649]				
25899 - Mr Peter Birch [8158]				
25903 - Mr Peter Bartrop [8650]				
25907 - Mrs Carol Bartrop [8651]				
25909 - Mr Luke Holmes [8652]				
25917 - Miss Ami Holmes [8653]				
25930 - Mrs Lucille Foreman [8574]				
25936 - Mr Colin Foreman [4394]				
25938 - Mr Kenneth Bailey [5045]				
25940 - Mrs Pauline Farthing [7120]				
25946 - Ms Deborah Cullen [4547]				
25948 - Mr Ben Holmes [8654]				
25956 - Mr Mark Holmes [8655]				
25964 - Mr Barry Coldham [8656]				
25969 - Mr John Caton [4881]				
25972 - Mrs Beryl Caton [8657]				
25975 - Mr Colin Holbrook [4759]				
25976 - Mr Eugene Cullen [8658]				
25985 - Mrs Janice Holbrook [4700]				
25992 - Hannah Cook [8659]				
25995 - Mr David Coates [8133]				
25997 - Mrs Shirley Holmes [8660]				
25998 - Mrs Clare Corby [8186]				



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26009 - Mr James Corby [8661]				
26012 - Mr Alex Corby [8663]				
26014 - Hazel Cowing [2817]				
26016 - Miss Lucy Corby [8664]				
26018 - Ms Julie Currey [8665]				
26020 - Mr Ken Holmes [8662]				
26030 - Ms Linda Cearn [5013]				
26033 - Mrs Louise Coldham [8666]				
26039 - Mrs Nicola Holmes [8668]				
26047 - Malcolm Hurford [7304]				
26058 - Mrs Joann Cook [8669]				
26060 - Mr Tony Cook [8670]				
26062 - Mr David Chalkley [8671]				
26064 - Mr D. Cormack [1447]				
26066 - Mr. Keith Creffield [8001]				
26068 - Mr John Bell [8672]				
26070 - Mr Gary Bedford [8673]				
26072 - Mrs Christine Bedford [8674]				
26074 - Mrs Kate Hurford [4275]				
26088 - Mrs Carole Cole [8675]				
26091 - Mr David Holland [8676]				
26108 - Mr James Hughes [8677]				
26118 - Mr. James Harris [8678]				
26123 - Mr Adam Harris [8679]				
26128 - Mrs Beverley Holla [8680]				
26130 - Mrs Hazel Town [4993]				
26136 - Mrs Jane House [8681]				
26139 - Mr Christopher House [8682]				
26141 - Miss Helen Sheard [8487]				
26143 - Ms Charlotte Hall [7147]				
26145 - Mrs Margaret Brooks [8683]				
26147 - Mr Kevin Hall [6734]				
26150 - Mrs Gillian Hall [8684]				
26153 - Mr David Hall [4867]				
26158 - Laura Harris [8685]				
26163 - Susan Harris [8686]				
26165 - Mr Reginald Dawson [8687]				
26167 - Mr John Eaton [8124]				
26169 - Mr Stephen Holland [8689]				
26172 - Mr Michael Jones [8690]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26178 - Mr Ken Holmes [8691]				
26181 - Mrs Janet Jacobs [8692]				
26184 - Mrs Catherine Jennings [8693]				
26186 - Mrs Louise Woodford [8398]				
26188 - Mrs. Susan Miers [8695]				
26192 - Mr Conrad Dixon [8688]				
26194 - Mr John Eaton [8124]				
26196 - Cariss Tsui [8694]				
26200 - Mrs Jacqueline Owen [4760]				
26202 - Ms Pauline Barry [8699]				
26204 - Mr Ron Beazley [4831]				
26206 - Mrs Christina Atkins [8118]				
26207 - Mrs Eileen Beazley [8700]				
26210 - Mr Neil Beney [8701]				
26212 - Mrs Christina Atkins [8118]				
26214 - Mrs Christina Atkins [8118]				
26216 - Mrs Christina Atkins [8118]				
26218 - Mrs Christina Atkins [8118]				
26220 - Mrs Christina Atkins [8118]				
26224 - Mr John Caton [4881]				
26225 - Mrs Christina Atkins [8118]				
26228 - Mrs Christina Atkins [8118]				
26232 - Mrs Christina Atkins [8118]				
26235 - Mrs Danielle Cross [7016]				
26237 - Mrs Christina Atkins [8118]				
26239 - Mrs Christina Atkins [8118]				
26244 - Mrs Susan Capes [8702]				
26246 - Mr Joseph W E Atkins [8703]				
26248 - Mr Joseph W E Atkins [8703]				
26252 - Mr Joseph W E Atkins				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
[8703] 26255 - Mrs Beryl Caton [8704] 26256 - Mr Joseph W E Atkins [8703] 26259 - Mr Joseph W E Atkins [8703] 26261 - Mr Steven Corby [8705] 26264 - Mr Joseph W E Atkins [8703] 26265 - Mr Joseph W E Atkins [8703] 26267 - Mr Joseph W E Atkins [8703] 26270 - Mr Joseph W E Atkins [8703] 26271 - Mr Joseph W E Atkins [8703] 26273 - Mr Joseph W E Atkins [8703] 26278 - Mr Michael Williams [8706] 26283 - Mrs Julie Ann Williams [8707] 26285 - Mr Jon Watson [7112] 26288 - Mr John Wollaston [8183] 26292 - Mr Neil Warner [8709] 26296 - Mrs. Gillian Warner [8710] 26298 - Ms Nicolte Unwin [8711] 26300 - Mr Alex Atkins [8126] 26302 - Ms Hayley Atkins [8712] 26304 - Ms Margaret Allan [8713] 26306 - Mr John Allan [8714] 26308 - Mr Christopher J Atkins [8715] 26310 - Mr Paul Anthony [6823] 26313 - Mrs Lorraine Wisdom [8718] 26315 - Mr Thomas Bury [8717] 26317 - Ms Lynn Baggott [8721] 26319 - Mr Alan Bird [8722] 26326 - Ms Maria J Bennett [8723] 26331 - Mrs Sandra Wood [8720] 26333 - Mr Robert J Brittleton				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
[8724] 26335 - Mrs Kelly BRITTLETON [8097] 26337 - Mr & Mrs Melvin & Joy Wright [8725] 26339 - Mrs. P. Bakdwin [8726] 26341 - Mrs Jeannette Butcher [8727] 26343 - Mr Michael Black [1291] 26345 - Mrs Ruth Black [8728] 26347 - Mr Cliff Black [8729] 26349 - Mrs Janet Birch [8730] 26353 - Mr Arthur Birch [4769] 26357 - Mrs Maureen Butler [5017] 26359 - Mrs Beryl Burgess [5030] 26376 - Mrs Kim Barber [8731] 26384 - Mr. Colin Barber [919] 26386 - Mr Martin Clark [2456] 26391 - Mrs Anita Clark [8168] 26393 - Mr John Adkins [8734] 26397 - Ms Anne Adkins [8735] 26400 - Ms Elizabeth Arthur [8736] 26402 - Ms Mandy Anthony [8737] 26409 - Mrs Ella Bradley [4875] 26411 - Mr. Gordon John Beman [8739] 26413 - Mr. Robert Beeching [3839] 26415 - Mr Peter Burgess [4863] 26418 - Ms Margaret Boreham [8033] 26421 - Mr David Baines [8740] 26430 - Mrs Rachel Caward [8742] 26433 - Mr Lee Caward [8741] 26441 - Mr Timothy Hogan [7309] 26446 - Mrs Wendy Dunbar [8743] 26448 - Mr Reginald Dawson [8744] 26450 - Mr Lewis Pincombe [8745] 26452 - Mrs Lindsey Pavitt [8746] 26454 - Mr Anthony Pavitt [8747]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26459 - Mr John Orbell [4805] 26463 - Mrs Karen York [8748] 26466 - Cllr Roger Keeble [1990] 26492 - Mr Surinder Panesar [8749] 26495 - Mrs Annabelle Panesar [8750] 26498 - Mrs Linda Watkinson [4984] 26501 - Ms Lesley Whan [8751]		<i>Removal of proposed developments R25 and R26 from the plan and reallocation of the 70 dwellings to more suitable brownfield sites in the borough. Support the aims of the Blackmore Village Heritage Association and the Blackmore Village "Neighbourhood Plan"</i>		
25812 - Fairview New Homes Ltd (Ms Faye Wilders) [8365]	Object	<p>Parking is a nightmare, school is full, GP is at capacity, post office has closed.</p> <p>Should show there are other suitable areas for these building works can take place. I believe it will drop house prices on all property in Blackmore which is unfair to residents already having property. I give my full support for BVHA to voice my views.</p> <p><i>Should show there are other suitable areas for these building works can take place. I believe it will drop house prices on all property in Blackmore which is unfair to residents already having property. I give my full support for BVHA to voice my views. Remove R25 from the plan</i></p>	Noted. No changes proposed to policy but will update Policy NE01 Protecting and Enhancing the Natural Environment in line with the NPPF requirements for securing net gains for biodiversity.	No further action
22488 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Criterion B. a. of Policy R25 states that vehicular access should be via Redrose Lane.</p> <p>ECC as Highway 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. The policy should therefore be amended to reflect this.</p> <p><i>Amend Policy R25 B. a. as follows -</i></p> <p><i>vehicular access via Nine Ashes Road;</i></p>	The policy wording is attempting to ensure that a safe and appropriate access can be achieved to the site. The Highways Authority notes that vehicle access via Red Rose Lane may not be able to meet highways standards. In this case an amendment to add for the potential for vehicle access via Nine Ashes Road is proposed. Further assessment will be required through a planning application to determine the most appropriate access point in consultation with the Highways Authority.	Amend Policy R25 B (a) to "vehicular access via Redrose Lane or Nine Ashes Road"

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23634 - Constable Homes Limited [7333]	Support	<p>Although we object to the indicative yield and suggest amendments are needed to make the policy sound but site R25 is fully supported. It is an appropriate site for the northern villages and would contribute towards a sustainable development. Site is suitable: it is not subject to any ecological designations, raise no concern regarding surface water flooding, capable of being laid out in a way that effects on the two listed buildings can be minimised. Site can contribute towards the 5-year housing land supply. The selected house builder has track record of delivery. The masterplan complies to the policy.</p> <p><i>To make the policy sound:</i>  <i>*The policy text needs to be amended to allow provision for around 50 new homes of mixed size and type;</i>  <i>* Policy Part A.b of the policy needs to clarify that the 25% requirement would comprise of all affordable housing and would contribute to the borough-wide Policy HP05 requirement to provide 35% affordable housing onsite; it should also contains a mechanism for these units to be made available for people outside the local area in the event that they are unfulfilled by people with a 'local connection'. Addition text are recommended as followed: [A S106...of age.] These dwellings should comprise affordable housing as defined by the NPPF and, for the avoidance of doubt, should contribute towards the requirements of Policy HP05 (Affordable Housing). [A person with ...parishes or wards.] The nomination agreement will include provision for the release of such dwellings to persons on a prescribed waiting list who do not meet the above criteria, following a 3- month period of seeking to secure a letting to a local person(s) in the event the local connection remains unfulfilled.</i></p>	<p>The requirement to provide an appropriate mix of housing sizes and types is set out in Policy HP01 Housing Mix.</p> <p>The Council is sympathetic to efforts to clarify policy and would consider doing so where required on the grounds of soundness. However, in this case it is considered that the requirement is clear to provide housing for people with a strong and demonstrable local connection or those of 50 years of age. This would be comprised of all affordable housing, as the policy wording and justification text set out (para 9.198). The mechanism for units to be made available for people outside the local area if they are unfulfilled by people with a local connection, is confirmed in justification text 9.198.</p> <p>Policy HP19 Conservation and Enhancement of Historic Environment requires that all development consider heritage assets, such as impact on listed buildings and conservation areas, which would be relevant and applicable to Blackmore and development on this site.</p>	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
		<i>*Policy Part B.d should add the following text: [heritage ... Blackmore] and taking account of the potential effect on the settings of listed buildings in accordance with the NPPF.</i>		
23272 - Mid and South Essex STP (Kerry Harding) [3791]	Support	Anticipated mitigation as a result of development on this site should include contribution towards increasing capacity by means of extension, reconfiguration or refurbishment or/and recruitment costs.	The Council recognises the importance of development providing appropriate contributions for necessary infrastructure improvements. This is reflected in Policy SP04 Developer Contributions which sets out the need for developers and landowners to contribute where there is an identified need for mitigation.	No further action
		<i>Clarify contribution costs</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>9.197</i>				
22198 - Mrs Helen Whalley [8199] 22223 - Mr Peter Drew [8212] 22258 - mr Steve Whalley [4328]	Object	<p>The development of houses at the top of Fingrith Hall Lane is within Epping Forest District Council area but will impact services and infrastructure in Blackmore. Consultation between the two boroughs has not taken place.</p> <p>Developing the greenbelt beyond the edge of Blackmore village is not appropriate to the rural setting of the area. It will change the historic and rural nature of the village and have an impact on already stretched infrastructure and services.</p> <p>This site is unsuitable as floods regularly. More housing will put pressure on sewers and increase flood risk elsewhere from surface water, particularly in historic village centre.</p> <p><i>Take into account housing development nearby in Epping Forest District.</i>  <i>Consult with Epping Forest District Council on housing development.</i>  <i>Protect the rural setting of Blackmore Village.</i>  <i>Avoid further impact on stretched local services and infrastructure.</i>  <i>Avoid building on area prone to flooding.</i>  <i>Avoid exceeding sewer capacity.</i>  <i>Avoid increasing the flood risk to other sites in Blackmore.</i>  <i>Remove R215 from the plan</i></p>	<p>Policy HP19 Conservation and Enhancement of Historic Environment requires that all development consider heritage assets, such as conservation areas and local character in the case of Blackmore village. Through gathering evidence in support of the Local Plan, the Council has not identified infrastructure issues that would prevent delivery of the number of homes proposed at site R25 (see Infrastructure Delivery Plan). The housing needs of the borough have been evidenced and the Council is proposing a spatial strategy to meet that need, which includes some development in villages such as Blackmore in order to provide a flexible supply of locations for new development to meet needs, as required by the NPPF (see NPPF paragraph 68). The Council remains engaged with its neighbours such as Epping Forest District Council on strategic cross boundary matters.</p>	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.198</b>				
22191 - Mrs Helen Whalley [8199]	Object	<p>A housing needs survey has not been done. The Council has not shown that there is a housing need locally or the quantity and type of housing needed.</p> <p><i>Undertake a local housing needs survey for the Villages in the north of the Borough and use the evidence from that to plan for local housing development.</i></p>	<p>The housing needs of the borough have been evidenced and the Council is proposing a spatial strategy to meet that need, which includes some development in villages such as Blackmore in order to provide a flexible supply of locations for new development to meet needs, as required by the NPPF (see NPPF paragraph 68).</p>	No further action
<b>9.199</b>				
22489 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective. Paragraph 9.199 makes reference to the main vehicular access for the site to be via Redrose Lane.</p> <p>ECC as Highway 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. The paragraph should therefore be amended to reflect this.</p> <p><i>Amend paragraph 9.199 as follows - The development will take its main vehicular access from Nine Ashes Road.....'</i></p>	<p>The policy wording is attempting to ensure that a safe and appropriate access can be achieved to the site. The justification text reflects this. The Highways Authority notes that vehicle access via Red Rose Lane may not be able to meet highways standards. In this case an amendment to add for the potential for vehicle access via Nine Ashes Road is proposed. Further assessment will be required through a planning application to determine the most appropriate access point in consultation with the Highways Authority.</p>	Amend justification text (para 9.199) to "The development will consider an appropriate main vehicular access via Redrose Lane or Nine Ashes Road"

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22196 - Mrs Helen Whalley [8199] 22255 - mr Steve Whalley [4328]	Object	<p>This proposed main vehicular access from Red Rose Lane is completely unsuitable for this volume of traffic due to its narrow and rural nature. To alter this old rural road would not be appropriate to the rural setting of the area. Section 2.10 of the Settlement Hierarchy chapter of the LDP states 'Development should be appropriate to the rural setting of the area.'</p> <p>Red Rose Lane is unsuitable for this volume of traffic because it floods regularly.</p> <p>The three junctions with faster main roads are not suitable for this volume of traffic. I am concerned that there would be accidents.</p> <p><i>Avoid changes to the rural nature of Red Rose Lane. Avoid an increase in the volume of traffic on/off Red Rose Lane. Avoid an increase in the volume of traffic at the junctions of Red Rose Lane and the main roads. Avoid an increase in the volume of traffic on Red Rose Lane which floods regularly. Remove R25 from the plan.</i></p>	<p>The appropriateness of Red Rose Lane for vehicular access to the site is being discussed with the Highways Authority, Essex County Council. Further assessment suggests that a more appropriate vehicle access could be achieved via Nine Ashes Road.</p>	<p>Amend justification text (para 9.199) to "The development will consider an appropriate main vehicular access via Redrose Lane or Nine Ashes Road".</p>
<hr/>				
<i>Land north of Orchard Piece, Blackmore</i>				
22491 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>2. Justified. 3. Effective. 4. Consistent with National Policy.</p> <p>Request additional paragraph after paragraph 9.204 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Insert following wording as additional paragraph after 9.204 -</i></p> <p><i>The proposed development area 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. It should however be ensured that any development within this area complies with flood risk mitigation measures outlined in the Essex SuDS guide.</i></p>	<p>Policy BE08 Sustainable Drainage will require appropriate consideration of SuDS to avoid any increase in flood risk for all development. Therefore, suggested additional justification text is not considered necessary.</p>	<p>No further action</p>

## POLICY R26: LAND NORTH OF ORCHARD PIECE

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY R26: LAND NORTH OF ORCHARD PIECE</i></b>				
22492 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>3. Effective. Criterion B. a. of Policy R26 states that vehicular access should be via Redrose Lane ECC 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.</p> <p><i>Amend Policy R26 B. a. as follows - vehicular access via Orchard Piece or Fingrith Hall Road;</i></p>	<p>The policy wording is attempting to ensure that a safe and appropriate access can be achieved to the site. The Highways Authority notes that vehicle access via Red Rose Lane may not be able to meet highways standards. In this case an amendment to add for the potential for vehicle access via Orchard Piece or Fingrith Hall Lane is proposed. Further assessment will be required through a planning application to determine the most appropriate access point in consultation with the Highways Authority.</p>	Amend Policy R26 B (a) to "vehicular access via Redrose Lane, Orchard Piece or Fingrith Hall Lane"
22578 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Object	<p>Policy wording lacks a commitment to deliver biodiversity net gain. The hedgerows should be retained and enhanced, open space should be multifunctional and should include semi natural habitats for the benefit of wildlife. The scheme should deliver a measurable net gain in biodiversity.</p> <p><i>Policy wording should be amended as follows: c. provision for "multifunctional" public open space to deliver a measurable net gain in biodiversity;</i></p>	<p>Noted. No changes proposed to policy but will update Policy NE01 Protecting and Enhancing the Natural Environment in line with the NPPF requirements for securing net gains for biodiversity.</p>	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
26573 - Mr & Mrs Gunthardt [8790]	Object	Our objections to the proposed development reflected the general views expressed by our Parish Council and those of a large proportion of the Village population. We feel strongly that the proposed development including the latest revised LDP would negatively impact on the unique character of the Blackmore Village and put undue strain on its already strained infrastructure and services including traffic and parking facilities, access to the local school, lack of adequate medical facilities, flooding etc. We also understand that there are now plans to build a further 70 properties just outside our borough which will cause further strain on the resources and infrastructure of our village. We fully support the efforts and views expressed by our local Parish Council. We trust that you will fully take into account of the views expressed by the residents of our village.	Policy HP19 Conservation and Enhancement of Historic Environment requires that all development consider heritage assets, such as conservation areas and local character in the case of Blackmore village. Through gathering evidence in support of the Local Plan, the Council has not identified infrastructure issues that would prevent delivery of the number of homes proposed at site R26 (see Infrastructure Delivery Plan). The housing needs of the borough have been evidenced and the Council is proposing a spatial strategy to meet that need, which includes some development in villages such as Blackmore in order to provide a flexible supply of locations for new development to meet needs, as required by the NPPF (see NPPF paragraph 68).	No further action
<i>Remove R25 and R26 from the plan</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22197 - Mrs Helen Whalley [8199] 22203 - Mr Anthony Cross [4376] 22256 - Mr Steve Whalley [4328] 22623 - Ms Pierina Norman [8290] 22630 - Ms Pierina Norman [8290] 22631 - Ms Pierina Norman [8290] 22637 - Ms Pierina Norman [8290] 22641 - Ms Gabriella Fickling [8292] 22643 - Ms Gabriella Fickling [8292] 22649 - Ms Gabriella Fickling [8292] 22651 - Ms Gabriella Fickling [8292] 22670 - Cllr. Andrew Watley [4869] 22671 - Cllr. Andrew Watley [4869] 22672 - Cllr. Andrew Watley [4869] 22673 - Cllr. Andrew Watley [4869] 22674 - Cllr. Andrew Watley [4869] 22675 - Cllr. Andrew Watley [4869] 22692 - Mr Richard Swift [1747] 22696 - Ms Virginia Stiff [1748] 22697 - D. Rawlings [1058] 22707 - Mrs Christine Blythe [4718] 22709 - Ms Gabriella Fickling [8292] 22710 - Dr Murray Wood [7003] 22713 - Dr Murray Wood [7003] 22715 - Dr Murray Wood [7003] 22717 - Dr Murray Wood [7003] 22719 - Dr Murray Wood [7003] 22723 - Dr Murray Wood [7003] 22724 - Ms Gabriella Fickling [8292] 22725 - Ms Pierina Norman [8290] 22726 - Dr Murray Wood [7003] 22727 - Ms Pierina Norman [8290] 22728 - Ms Pierina Norman [8290]	Object	<p>Proposal is damaging to village. Inclusion of site allocations R25 and R26 in the LDP are inappropriate, unsound and not compliant with legal requirements on the following grounds: failure to prove that more suitable (brownfield) sites do not exist in the borough, or that other site allocations couldn't absorb the 70 dwellings proposed; inadequate consultation with adjoining boroughs and failure to properly consider the impact of other nearby developments on Blackmore; failure to recognise the increased flood risk resulting from the proposed development; adverse impact on roads including parking in village centre, noise levels and safety of existing road users from increased traffic; inadequate local amenities/services, impact on local school, already at capacity, GP is full and has long waiting times; impact on wildlife, impact on Green Belt; failed to provide a development strategy for the boroughs northern villages. Need to carry out a local housing need survey in the village. Consider the impact on the historical heritage of the village. Numbers proposed is out of proportion with the size of the existing village. Access roads are unsuitable for more traffic and are liable to flood. Power supply prone to power cuts, sewerage capacity not sufficient, Proposal is not sustainable. There is a lack of employment.</p>	<p>Through gathering evidence in support of the Local Plan, the Council has not identified infrastructure issues that would prevent delivery of this number of homes (see Infrastructure Delivery Plan). The housing needs of the borough have been evidenced and the Council is proposing a spatial strategy to meet that need, which includes some development in villages such as Blackmore in order to provide a flexible supply of locations for new development to meet needs, as required by the NPPF (see NPPF paragraph 68). A sequential approach to identifying locations for development has been applied, starting with existing urban areas and brownfield sites. There is not enough urban area/brownfield land to meet development needs, and so the Council has reluctantly considered release of Green Belt to meet those needs. Transport, flood risk, Green Belt and water cycle; landscape and ecology studies have been undertaken and published as part of the Local Plan evidence base, informing policies and site allocations.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22730 - Ms Pierina Norman [8290]				
22819 - Mr Kenneth Herring [4841]				
22821 - Mr Kenneth Herring [4841]				
22823 - Mr Kenneth Herring [4841]				
22825 - Mr Kenneth Herring [4841]				
22827 - Mr Kenneth Herring [4841]				
22829 - Mr Kenneth Herring [4841]				
22831 - Mr Kenneth Herring [4841]				
22862 - Mr Thomas Thwaite [4475]				
22863 - Mr Thomas Thwaite [4475]				
22864 - Mr Thomas Thwaite [4475]				
22865 - Mr Thomas Thwaite [4475]				
22866 - Mr Thomas Thwaite [4475]				
22867 - Mr Thomas Thwaite [4475]				
22868 - Mr Thomas Thwaite [4475]				
22869 - Mr Thomas Thwaite [4475]				
22870 - Mr Thomas Thwaite [4475]				
22871 - Mr Thomas Thwaite [4475]				
22876 - Holmes & Hills LLP (Mr Michael Harman) [8074]				
22877 - Holmes & Hills LLP (Mr Michael Harman) [8074]				
22878 - Holmes & Hills LLP (Mr Michael Harman) [8074]				
22885 - Mr Stephen Chapman [8245]				
22886 - Mr Stephen Chapman [8245]				
22887 - Mr Stephen Chapman				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
[8245]				
22888 - Mr Stephen Chapman				
[8245]				
22924 - Mrs Shirley Slade-				
Bennett [8240]				
22925 - Mrs Shirley Slade-				
Bennett [8240]				
22926 - Mrs Shirley Slade-				
Bennett [8240]				
22928 - Mrs Shirley Slade-				
Bennett [8240]				
22929 - Mrs Shirley Slade-				
Bennett [8240]				
22934 - Mrs Shirley Slade-				
Bennett [8240]				
22975 - Mr Tom Bennett [4388]				
22976 - Mr Tom Bennett [4388]				
22977 - Mr Tom Bennett [4388]				
22978 - Mr Tom Bennett [4388]				
22979 - Mr Tom Bennett [4388]				
22980 - Mr Tom Bennett [4388]				
22981 - Mr Tom Bennett [4388]				
22983 - Mr Anthony Cross [4376]				
22984 - Mr Anthony Cross [4376]				
22985 - Mr Anthony Cross [4376]				
22986 - Mr Anthony Cross [4376]				
22987 - Mr Anthony Cross [4376]				
22988 - Mr Anthony Cross [4376]				
22989 - Mr Anthony Cross [4376]				
22990 - Mr Anthony Cross [4376]				
23004 - Mr Gary Dimond [7055]				
23005 - Mr Gary Dimond [7055]				
23006 - Mr Gary Dimond [7055]				
23007 - Mr Gary Dimond [7055]				
23008 - Mr Gary Dimond [7055]				
23009 - Mr Gary Dimond [7055]				
23010 - Mr Gary Dimond [7055]				
23011 - Mr Gary Dimond [7055]				
23012 - Mr Gary Dimond [7055]				
23013 - Mr Gary Dimond [7055]				
23014 - Mrs Ruth Dimond [4851]				
23015 - Mrs Ruth Dimond [4851]				
23016 - Mrs Ruth Dimond [4851]				
23017 - Mrs Ruth Dimond [4851]				
23018 - Mrs Ruth Dimond [4851]				
23019 - Mrs Ruth Dimond [4851]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23028 - Mr Andrew Chambers [8300]				
23030 - Mr Andrew Chambers [8300]				
23031 - Mr Andrew Chambers [8300]				
23034 - Mr Andrew Chambers [8300]				
23036 - Mr Andrew Chambers [8300]				
23039 - Mr Andrew Chambers [8300]				
23041 - Mr Andrew Chambers [8300]				
23043 - Mr Andrew Chambers [8300]				
23050 - Miss Natalie Smith [8301]				
23053 - Miss Natalie Smith [8301]				
23056 - Miss Natalie Smith [8301]				
23058 - Miss Natalie Smith [8301]				
23059 - Miss Natalie Smith [8301]				
23062 - Miss Natalie Smith [8301]				
23064 - Miss Natalie Smith [8301]				
23066 - Miss Natalie Smith [8301]				
23069 - Miss Emily Dimond [7227]				
23071 - Mr Sonny Smith [8302]				
23073 - Mr Sonny Smith [8302]				
23075 - Miss Emily Dimond [7227]				
23077 - Mr Sonny Smith [8302]				
23079 - Mr Sonny Smith [8302]				
23081 - Mr Sonny Smith [8302]				
23083 - Mr Sonny Smith [8302]				
23084 - Miss Emily Dimond [7227]				
23086 - Mr Sonny Smith [8302]				
23087 - Miss Emily Dimond [7227]				
23088 - Miss Emily Dimond [7227]				
23089 - Miss Emily Dimond [7227]				
23090 - Miss Emily Dimond [7227]				
23091 - Miss Emily Dimond [7227]				
23092 - Miss Emily Dimond [7227]				
23093 - Miss Emily Dimond [7227]				
23098 - Mrs Sophia Severn [4876]				
23100 - Mrs Sophia Severn [4876]				
23102 - Mrs Sophia Severn [4876]				
23134 - Ms Wendy Cohen [6923]				
23135 - Ms Wendy Cohen [6923]				



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23136 - Ms Wendy Cohen [6923]				
23137 - Ms Wendy Cohen [6923]				
23138 - Ms Wendy Cohen [6923]				
23140 - Ms Wendy Cohen [6923]				
23152 - Mr Kevin Wood [6965]				
23153 - Mr Kevin Wood [6965]				
23154 - Mr Kevin Wood [6965]				
23155 - Mr Kevin Wood [6965]				
23273 - Mid and South Essex STP (Kerry Harding) [3791]				
23315 - Mr John Riley [4905]				
23317 - Mr John Riley [4905]				
23319 - Mr John Riley [4905]				
23321 - Mr John Riley [4905]				
23323 - Mr John Riley [4905]				
23325 - Mr John Riley [4905]				
23327 - Mr John Riley [4905]				
23329 - Mr John Riley [4905]				
23331 - Mr John Riley [4905]				
23334 - Mr John Riley [4905]				
23336 - Mrs Danielle Cohen [8313]				
23360 - Ms Dawn Ireland [4861]				
23361 - Ms Janet Parris [8315]				
23364 - Ms Dawn Ireland [4861]				
23365 - Ms Janet Parris [8315]				
23367 - Mr. Peter Shipton [289]				
23369 - Mr Stephen Allington [8316]				
23373 - Mr Stephen Allington [8316]				
23374 - Mr. Peter Shipton [289]				
23375 - Mr. Peter Shipton [289]				
23377 - Mr. Peter Shipton [289]				
23379 - Mr. Peter Shipton [289]				
23381 - Mr. Peter Shipton [289]				
23388 - Ms Dawn Ireland [4861]				
23400 - Ms Dawn Ireland [4861]				
23401 - Miss Heather Jones [8318]				
23403 - Miss Heather Jones [8318]				
23404 - Miss Heather Jones [8318]				
23405 - Miss Heather Jones [8318]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23406 - Miss Heather Jones [8318]				
23407 - Miss Heather Jones [8318]				
23408 - Miss Heather Jones [8318]				
23410 - Miss Heather Jones [8318]				
23411 - Miss Heather Jones [8318]				
23413 - Miss Heather Jones [8318]				
23414 - Ms Dawn Ireland [4861]				
23432 - Mr Benjamin Rumary [8324]				
23453 - Ms Christine Durdant- Pead [8117]				
23455 - Ms Christine Durdant- Pead [8117]				
23457 - Ms Christine Durdant- Pead [8117]				
23459 - Ms Christine Durdant- Pead [8117]				
23461 - Ms Christine Durdant- Pead [8117]				
23463 - Ms Christine Durdant- Pead [8117]				
23465 - Ms Christine Durdant- Pead [8117]				
23467 - Ms Christine Durdant- Pead [8117]				
23469 - Ms Christine Durdant- Pead [8117]				
23471 - Mr Marc Cohen [4268]				
23477 - Ms Leanne Hartley [8325]				
23479 - Ms Leanne Hartley [8325]				
23481 - Ms Leanne Hartley [8325]				
23483 - Ms Leanne Hartley [8325]				
23485 - Ms Leanne Hartley [8325]				
23487 - Ms Leanne Hartley [8325]				
23489 - Ms Leanne Hartley [8325]				
23491 - Ms Leanne Hartley [8325]				
23493 - Ms Leanne Hartley [8325]				
23495 - Ms Leanne Hartley [8325]				
23497 - Ms Leanne Hartley [8325]				
23499 - Ms Leanne Hartley [8325]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23501 - Ms Leanne Hartley [8325]				
23503 - Ms Leanne Hartley [8325]				
23505 - Mr Richard Thwaite [6964]				
23507 - Mr Richard Thwaite [6964]				
23509 - Mr Richard Thwaite [6964]				
23511 - Mr Richard Thwaite [6964]				
23513 - Mr Richard Thwaite [6964]				
23515 - Mr Richard Thwaite [6964]				
23517 - Mr Richard Thwaite [6964]				
23519 - Mr Richard Thwaite [6964]				
23523 - Mr Richard Thwaite [6964]				
23524 - Mr Richard Thwaite [6964]				
23525 - Mr Richard Thwaite [6964]				
23527 - Mr Richard Thwaite [6964]				
23529 - Mr Richard Thwaite [6964]				
23532 - Mr Richard Thwaite [6964]				
23533 - Mr Gary Durdant-Pead [8326]				
23537 - Mr Gary Durdant-Pead [8326]				
23540 - Mr Gary Durdant-Pead [8326]				
23542 - Mr David Barfoot [7177]				
23545 - Mr Gary Durdant-Pead [8326]				
23547 - Mr Gary Durdant-Pead [8326]				
23549 - Mrs Janet Barfoot [7200]				
23551 - Mr Gary Durdant-Pead [8326]				
23554 - Mr Gary Durdant-Pead [8326]				

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23562 - Ms Eleanora Barfoot [8328]				
23566 - Mrs Hayley Hammond [8329]				
23577 - Sadie Barfoot [8330]				
23629 - Mr Michael Evans [8332]				
23764 - Mr. David Cartwright [7193]				
23767 - Mr. David Cartwright [7193]				
23770 - Mr. David Cartwright [7193]				
23772 - Mr. David Cartwright [7193]				
23774 - Mr. David Cartwright [7193]				
23776 - Mr. David Cartwright [7193]				
23915 - Crest Nicholson Eastern [2509]				
23917 - Crest Nicholson Eastern [2509]				
23922 - Crest Nicholson Eastern [2509]				
23923 - Crest Nicholson Eastern [2509]				
24196 - Mrs. Margaret Cartwright [7195]				
24200 - Mrs. Margaret Cartwright [7195]				
24208 - Mrs. Margaret Cartwright [7195]				
24214 - Mrs. Margaret Cartwright [7195]				
24220 - Mrs. Margaret Cartwright [7195]				
24226 - Mr Callum Cartwright [8370]				
24232 - Mr Callum Cartwright [8370]				
24238 - Mr Callum Cartwright [8370]				
24244 - Mr Callum Cartwright [8370]				
24355 - Mr Michael Haynes [8138]				
24361 - Mr Michael Haynes [8138]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24362 - Mr Michael Haynes [8138]				
24363 - Mr Michael Haynes [8138]				
24365 - Mr Michael Haynes [8138]				
24366 - Mr Michael Haynes [8138]				
24367 - Mr Michael Haynes [8138]				
24368 - Mr Michael Haynes [8138]				
24369 - Mr Michael Haynes [8138]				
24370 - Mr Michael Haynes [8138]				
24371 - Mr Michael Haynes [8138]				
24374 - Mr Jack Emmett [8372]				
24376 - Mr Jack Emmett [8372]				
24378 - Mr Jack Emmett [8372]				
24380 - Mr Jack Emmett [8372]				
24382 - Mr Jack Emmett [8372]				
24390 - Mr John Fowles [8373]				
24392 - Mr John Fowles [8373]				
24395 - Mr John Fowles [8373]				
24400 - Dr. S.J. Jennings [1497]				
24404 - Dr. S.J. Jennings [1497]				
24406 - Dr. S.J. Jennings [1497]				
24408 - Dr. S.J. Jennings [1497]				
24410 - Dr. S.J. Jennings [1497]				
24412 - Dr. S.J. Jennings [1497]				
24414 - Dr. S.J. Jennings [1497]				
24416 - Dr. S.J. Jennings [1497]				
24418 - Dr. S.J. Jennings [1497]				
24420 - Miss Nicky Joiner [8374]				
24421 - Miss Nicky Joiner [8374]				
24427 - Mr Kevin Joyner [8375]				
24428 - Mr Kevin Joyner [8375]				
24429 - Mr Kevin Joyner [8375]				
24444 - Mrs Vicky Mumby [8378]				
24446 - Mrs Vicky Mumby [8378]				
24448 - Mrs Vicky Mumby [8378]				
24450 - Mrs Vicky Mumby [8378]				
24452 - Mrs Vicky Mumby [8378]				
24462 - Mr Mark Mumby [8379]				
24464 - Mr Mark Mumby [8379]				
24466 - Mr Mark Mumby [8379]				
24468 - Mr Mark Mumby [8379]				
24469 - Mr Mark Mumby [8379]				
24475 - Mr Frederick Piper [8380]				
24477 - Mr Frederick Piper [8380]				
24479 - Mr Frederick Piper [8380]				
24483 - Mrs Eileen Piper [8381]				
24486 - Mrs Eileen Piper [8381]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24487 - Mrs Eileen Piper [8381]				
24488 - Mrs Eileen Piper [8381]				
24491 - Mrs Eileen Piper [8381]				
24495 - Mr Albert Pardoe [8002]				
24499 - Mr Richard Reed [4708]				
24502 - Dr Belinda Dunbar [8382]				
24508 - Mr Peter Robinson [4899]				
24509 - Danielle Keys [8376]				
24515 - Mrs Terri Reed [4303]				
24517 - Mrs Jean Drew [8383]				
24519 - Mr Andrew Dawson [8385]				
24521 - Mrs Irene Saunders [8386]				
24523 - Ms Pauline Davidson [6327]				
24529 - Mrs Diane Smith [8388]				
24531 - Mrs Diane Smith [8388]				
24533 - Mrs Diane Smith [8388]				
24535 - Mrs Diane Smith [8388]				
24537 - Mrs Diane Smith [8388]				
24539 - Mrs Diane Smith [8388]				
24541 - Mrs Tracey Dawson [8390]				
24544 - Mrs Lorna Mitchell [8391]				
24548 - Mr Paul De Rosa [8393]				
24550 - Mr Philip Dow [8394]				
24553 - Mrs Anne Davies [8395]				
24557 - Mrs Angela Taylor [8392]				
24559 - Mrs Angela Taylor [8392]				
24561 - Mrs Angela Taylor [8392]				
24563 - Mrs Angela Taylor [8392]				
24565 - Mrs Angela Taylor [8392]				
24567 - Mrs Angela Taylor [8392]				
24569 - Mrs Angela Taylor [8392]				
24571 - Mrs Angela Taylor [8392]				
24574 - Mrs Marion Woolaston [8397]				
24576 - Mr Peter Davies [8396]				
24582 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]				
24584 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]				
24586 - Blackmore Village				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
Heritage Association (Mr William Ratcliffe) [4874]				
24588 - Blackmore Village				
Heritage Association (Mr William Ratcliffe) [4874]				
24590 - Blackmore Village				
Heritage Association (Mr William Ratcliffe) [4874]				
24592 - Blackmore Village				
Heritage Association (Mr William Ratcliffe) [4874]				
24594 - Blackmore Village				
Heritage Association (Mr William Ratcliffe) [4874]				
24596 - Blackmore Village				
Heritage Association (Mr William Ratcliffe) [4874]				
24598 - Blackmore Village				
Heritage Association (Mr William Ratcliffe) [4874]				
24602 - Mr Ronald Saunders [8384]				
24604 - Mr Anthony Walker [8401]				
24606 - Mr John Warner [5018]				
24608 - Mr David Wade [8402]				
24614 - Mr Pete Vince [8123]				
24619 - Mr Lyall Vince [8403]				
24624 - Mrs Tina Wilding [8405]				
24626 - Terence Dearlove [8404]				
24633 - Mr Nicholas Wilkinson [8406]				
24635 - Mrs Margaret Wiltshire [7141]				
24638 - Giovanni De Domonocos [8407]				
24642 - Mr Colin Wilding [8409]				
24645 - Mrs Alexandre De Dominicis [6951]				
24647 - John Drain [8410]				
24649 - Jennifer Drain [8412]				
24655 - Mrs Karen Wood [8411]				
24658 - Mrs Karen Wood [8411]				
24660 - Mrs Ruth Wade [8413]				
24667 - Mr Mark Wisdom [8414]				
24676 - Mr Eric John Webb [1830]				
24680 - Ms Shirley Dearlove				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
[8415] 24682 - Mrs Helen Haynes [8416] 24686 - Mrs Patricia Dillon [8417] 24688 - Mr Dennis Trumble [8418] 24690 - Mrs Elizabeth Thompson [5016] 24692 - Mr Stuart Townsend [8419] 24697 - Mr Desmond Temple [8420] 24699 - Miss Yasmin Tossun [8421] 24701 - Mrs Susan Tossun [8422] 24703 - Mr. Gurpal Singh Dhesi [7270] 24705 - Mrs. Bhupinder Dhesi [7269] 24707 - Mr. Gurpreet Dhesi [7268] 24709 - Mr Stuart Lucas [4956] 24711 - Mr Frank Tabor [8424] 24713 - Mr Shefik Tossun [8425] 24715 - Anna Dunk [8426] 24719 - Mrs Christine Tabor [8427] 24721 - Mrs Karen Tomey [8428] 24723 - Mrs Elisabeth Taylor [2918] 24725 - Miss Chloe Taylor [8429] 24727 - Mr James Taylor [8430] 24729 - Mr Steven Taylor [8431] 24736 - Mrs Jasdeep Dhesi [7266] 24738 - Mrs Patricia Dean [8434] 24741 - Barry Robert Dean [8435] 24744 - Mr Joe Emmett [8436] 24746 - Mrs Paula Tregent [8433] 24748 - Mr Paul Tregent [8437] 24751 - Miss Harriet Davis [8440] 24755 - Mrs Kathleen Trumble [5029] 24756 - Mr Edward Davis [8441] 24758 - Mr Robert Davis [4789] 24760 - Mr Raymond Thompson [4840] 24762 - Ms. Donna Toomey				



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
[8024]				
24764 - Ann Davis [4404]				
24771 - Mrs Angela Taylor				
[8442]				
24772 - Samantha Dunk [8438]				
24774 - Mr John Dawson [8444]				
24776 - Mr John Dawson [8444]				
24778 - Mr John Dawson [8444]				
24780 - Mr John Dawson [8444]				
24782 - Mr John Dawson [8444]				
24784 - Mr Alan Dodd [4828]				
24786 - MR David Emmett [8445]				
24793 - Mrs Deborah Thwaite				
[8175]				
24795 - Ms Jennifer Emmett				
[4896]				
24797 - Miss Donna Taylor [8446]				
24799 - Catherine Elliott [8447]				
24803 - Heather Eltham [8449]				
24807 - Ms Patricia Taylor [6880]				
24809 - Ms Patricia Taylor [6880]				
24811 - Ms Patricia Taylor [6880]				
24813 - Ms Patricia Taylor [6880]				
24815 - Kirsty Edwards [8450]				
24821 - Mrs Susan Webb [4919]				
24826 - Mr Adrian Quick [8451]				
24832 - Mr Ronald Quested				
[8452]				
24834 - Mrs Cynthia Kirby [8453]				
24836 - Mr David Kirby [8454]				
24841 - Donna Eaton [8455]				
24842 - Mrs Clare Forstner [4847]				
24844 - Mrs Clare Forstner [4847]				
24846 - Mrs Clare Forstner [4847]				
24848 - Mrs Clare Forstner [4847]				
24850 - Mrs Clare Forstner [4847]				
24852 - Mr Scott Osborne [8456]				
24854 - Mrs Beryl Fox [8457]				
24856 - Mrs Beryl Fox [8457]				
24860 - Mrs Faye Osborne [8458]				
24862 - Mrs Ceri Fisher [8459]				
24864 - Mrs Ceri Fisher [8459]				
24866 - Mrs Ceri Fisher [8459]				
24868 - Mrs Ceri Fisher [8459]				
24871 - Mrs Ceri Fisher [8459]				
24872 - Mr David Olley [8461]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24874 - Mrs Gemma Olley [8462]				
24876 - Mr Dane Fullick [8463]				
24878 - Mr Dane Fullick [8463]				
24879 - Mr Dane Fullick [8463]				
24882 - Mr Dane Fullick [8463]				
24884 - Mr Marcus Forstner [8160]				
24886 - Mr Marcus Forstner [8160]				
24888 - Mr Marcus Forstner [8160]				
24891 - Mrs Michelle Fullick [8464]				
24893 - Mrs Michelle Fullick [8464]				
24895 - Mrs Michelle Fullick [8464]				
24897 - Mrs Michelle Fullick [8464]				
24900 - Mrs Michelle Fullick [8464]				
24902 - Mrs Michelle Fullick [8464]				
24904 - Mrs Michelle Fullick [8464]				
24906 - Miss Autumn Fullick [8466]				
24911 - Jacqueline Greagsby [8465]				
24912 - Miss Autumn Fullick [8466]				
24913 - Miss Autumn Fullick [8466]				
24916 - Miss Autumn Fullick [8466]				
24918 - Mr Lee Fullick [8467]				
24920 - Mr Lee Fullick [8467]				
24922 - Mr Lee Fullick [8467]				
24924 - Mr Lee Fullick [8467]				
24926 - Mr Lee Fullick [8467]				
24929 - Kay Ginivan [8468]				
24932 - Mrs Susie Finlay [5892]				
24934 - Mrs Susie Finlay [5892]				
24936 - Mrs Susie Finlay [5892]				
24938 - Mrs Susie Finlay [5892]				
24940 - Mrs Susie Finlay [5892]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24942 - Mrs Susie Finlay [5892]				
24945 - Mr Andrew Finlay [8191]				
24947 - Mr Andrew Finlay [8191]				
24949 - Mr Andrew Finlay [8191]				
24951 - Mr Andrew Finlay [8191]				
24953 - Mr Andrew Finlay [8191]				
24955 - Mr Andrew Finlay [8191]				
24957 - Mrs Grace Furnell [8182]				
24959 - Mrs Grace Furnell [8182]				
24961 - Mrs Grace Furnell [8182]				
24963 - Mrs Grace Furnell [8182]				
24966 - Mrs Grace Furnell [8182]				
24967 - Mrs Grace Furnell [8182]				
24969 - Mrs Grace Furnell [8182]				
24971 - Mrs Lesley Fletcher [8469]				
24972 - Mrs Lesley Fletcher [8469]				
24975 - Mrs Lesley Fletcher [8469]				
24977 - Mrs Lesley Fletcher [8469]				
24980 - Mr Christoper Fletcher [8470]				
24981 - Mr Christoper Fletcher [8470]				
24983 - Mr Christoper Fletcher [8470]				
24985 - Mr Christoper Fletcher [8470]				
24987 - Edwin Fisher [1189]				
24990 - Edwin Fisher [1189]				
24991 - Edwin Fisher [1189]				
24993 - Edwin Fisher [1189]				
24995 - Mrs Aileen Fisher [8471]				
24997 - Mrs Aileen Fisher [8471]				
24999 - Mrs Aileen Fisher [8471]				
25001 - Mr Leslie Smith [8472]				
25004 - Ms Doreen Greenshields [8460]				
25006 - Mr John Ginivan [8476]				
25009 - Ms Rebecca Edwards [8477]				
25011 - Miss Claire Grant [8478]				
25017 - Mr Christopher Sanders [8474]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25019 - Mrs Jacqueline Frost [8479]				
25025 - Mr Richard Fisher [8480]				
25026 - Mr Richard Fisher [8480]				
25027 - Mr Richard Fisher [8480]				
25028 - Mr Richard Fisher [8480]				
25029 - Mr Richard Fisher [8480]				
25031 - Ms Victoria Sanders [8482]				
25035 - Mrs Karen Geary [8483]				
25039 - Ms Jill Griffiths [5024]				
25041 - Mrs Karen Geary [8483]				
25043 - Mrs Karen Geary [8483]				
25045 - Mrs Karen Geary [8483]				
25048 - Mr Alan Snook [8484]				
25051 - Mrs Karen Geary [8483]				
25053 - Mrs Karen Geary [8483]				
25055 - Mrs Karen Geary [8483]				
25057 - Mrs Sandra Eaton [8486]				
25060 - Ruth Jones [8485]				
25064 - Mr Steven Jacobs [4408]				
25066 - Ms Sylvia Pascoe [7953]				
25070 - Diane Jones [8488]				
25074 - Mrs Josephine Snook [8489]				
25076 - Mrs Alison Goddard-King [8490]				
25078 - Mrs Alison Goddard-King [8490]				
25080 - Mrs Alison Goddard-King [8490]				
25082 - Mrs Alison Goddard-King [8490]				
25084 - Mr David Greagsby [8491]				
25086 - Mr David Greagsby [8491]				
25087 - Mr David Greagsby [8491]				
25090 - Mr David Greagsby [8491]				
25092 - Mr Christopher Gill [8492]				
25094 - Mr Christopher Gill [8492]				
25096 - Mrs Joanne Gill [4758]				
25098 - Mrs Joanne Gill [4758]				
25100 - Mrs Joanne Gill [4758]				
25102 - Mrs Joanne Gill [4758]				
25104 - Mrs Joanne Gill [4758]				
25106 - Mrs Joanne Gill [4758]				
25108 - Mr Keith Godbee [4942]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25109 - Mr Keith Godbee [4942]				
25113 - Mr Keith Godbee [4942]				
25115 - Mr Keith Godbee [4942]				
25117 - Mr Keith Godbee [4942]				
25120 - Mr Bruno Giordan [8104]				
25122 - Mr Bruno Giordan [8104]				
25124 - Valerie Godbee [4943]				
25127 - Valerie Godbee [4943]				
25129 - Valerie Godbee [4943]				
25131 - Valerie Godbee [4943]				
25134 - Brenda Juniper [8493]				
25135 - Valerie Godbee [4943]				
25137 - Valerie Godbee [4943]				
25139 - Valerie Godbee [4943]				
25141 - Valerie Godbee [4943]				
25143 - Valerie Godbee [4943]				
25145 - Valerie Godbee [4943]				
25147 - Mr Paul David Jackson [7387]				
25149 - Mr Terry Geary [8494]				
25150 - Mr Terry Geary [8494]				
25152 - Mr Terry Geary [8494]				
25154 - Mr Terry Geary [8494]				
25158 - Mr Terry Geary [8494]				
25159 - Iris Jones [8495]				
25163 - Mr Terry Geary [8494]				
25165 - Mr Paul Gardiner [5703]				
25167 - Mr Paul Gardiner [5703]				
25169 - Mr Paul Gardiner [5703]				
25171 - Mr Paul Gardiner [5703]				
25173 - Mr Paul Gardiner [5703]				
25175 - Mr Paul Gardiner [5703]				
25177 - Mrs Jacqueline Lawrenson [8496]				
25179 - Mrs Jacqueline Lawrenson [8496]				
25181 - Mrs Jacqueline Lawrenson [8496]				
25183 - Mrs Jacqueline Lawrenson [8496]				
25187 - Mrs Jacqueline Lawrenson [8496]				
25189 - Mrs Jacqueline Lawrenson [8496]				
25191 - Mr Thomas Lennon [747]				
25193 - Mr Thomas Lennon [747]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25194 - Mr Thomas Lennon [747]				
25197 - Mr Thomas Lennon [747]				
25199 - Mrs Rose Linton [8497]				
25201 - Mrs Rose Linton [8497]				
25203 - Mr Terry Mander [4562]				
25205 - Mrs Rose Linton [8497]				
25207 - Mrs Rose Linton [8497]				
25209 - Mrs Rose Linton [8497]				
25211 - Mrs Jackie Locke [8498]				
25213 - Mrs Jackie Locke [8498]				
25215 - Mrs Jackie Locke [8498]				
25217 - Mrs Jackie Locke [8498]				
25219 - Mrs Jackie Locke [8498]				
25221 - Mrs Jackie Locke [8498]				
25223 - Mrs Jackie Locke [8498]				
25225 - Mrs Kim Lucas [4711]				
25227 - Mrs Kim Lucas [4711]				
25229 - Mrs Kim Lucas [4711]				
25231 - Mrs Kim Lucas [4711]				
25233 - Mrs Kim Lucas [4711]				
25235 - Mrs Margaret Laing [7046]				
25237 - Mrs Margaret Laing [7046]				
25239 - Mrs Margaret Laing [7046]				
25241 - Mrs Margaret Laing [7046]				
25243 - Mrs Margaret Laing [7046]				
25246 - Mrs Margaret Laing [7046]				
25248 - Mrs Margaret Laing [7046]				
25250 - Mrs Margaret Laing [7046]				
25252 - Mrs Margaret Laing [7046]				
25253 - Mrs Margaret Laing [7046]				
25255 - Mrs Margaret Laing [7046]				
25257 - Mrs Margaret Laing [7046]				
25258 - Mrs Margaret Laing [7046]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25263 - Mrs Michelle Morgan [4505]				
25264 - Mr John Laing [8501]				
25266 - Mr John Laing [8501]				
25268 - Mr John Laing [8501]				
25270 - Mr John Laing [8501]				
25272 - Mr John Laing [8501]				
25274 - Mr John Laing [8501]				
25276 - Mr John Laing [8501]				
25278 - Mr John Laing [8501]				
25280 - Mr John Laing [8501]				
25282 - Mr John Laing [8501]				
25284 - Mr John Laing [8501]				
25286 - Mr John Laing [8501]				
25288 - Mr John Laing [8501]				
25291 - Mrs Doreen Larney [8502]				
25293 - Mrs Doreen Larney [8502]				
25295 - Mrs Doreen Larney [8502]				
25296 - Mrs Doreen Larney [8502]				
25299 - Mrs Doreen Larney [8502]				
25301 - Mrs Doreen Larney [8502]				
25303 - Mrs Doreen Larney [8502]				
25305 - Mr Alfred Larney [4990]				
25307 - Mr Alfred Larney [4990]				
25309 - Mr Alfred Larney [4990]				
25311 - Mr Alfred Larney [4990]				
25313 - Mr Alfred Larney [4990]				
25315 - Mrs Alison Lester [8503]				
25317 - Mrs Alison Lester [8503]				
25319 - Mrs Alison Lester [8503]				
25321 - Mrs Alison Lester [8503]				
25322 - Mrs Alison Lester [8503]				
25325 - Mrs Alison Lester [8503]				
25327 - Mrs Alison Lester [8503]				
25329 - Mrs Nicola Lester [8504]				
25331 - Mrs Nicola Lester [8504]				
25333 - Mrs Nicola Lester [8504]				
25335 - Mrs Nicola Lester [8504]				
25337 - Mrs Nicola Lester [8504]				
25339 - Mrs Nicola Lester [8504]				
25341 - Mrs Nicola Lester [8504]				
25343 - Mr Graham Lawrenson [6958]				
25345 - Mr Graham Lawrenson [6958]				
25346 - Mr Graham Lawrenson				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
[6958] 25348 - Mr Graham Lawrenson [6958] 25351 - Mr Graham Lawrenson [6958] 25353 - Mr Graham Lawrenson [6958] 25354 - Mr Graham Lawrenson [6958] 25357 - Mr Graham Lawrenson [6958] 25359 - Mr Graham Lawrenson [6958] 25361 - Mr Graham Lawrenson [6958] 25364 - - Neil Stainer [2334] 25365 - Mr Christopher Blackwell [8505] 25367 - Mr Christopher Blackwell [8505] 25369 - Mr Christopher Blackwell [8505] 25373 - Mr Christopher Blackwell [8505] 25375 - Mr Christopher Blackwell [8505] 25377 - Mr Christopher Blackwell [8505] 25379 - Mr Christopher Blackwell [8505] 25382 - Mrs Paula Lennon [8506] 25383 - Mr Gary Sanders [4923] 25385 - Mr Paul Sullivan [8507] 25387 - Mrs Debbie Spencer [6959] 25389 - Mrs Anne Stockman [8508] 25391 - Mrs Paula Lennon [8506] 25393 - Mrs Paula Lennon [8506] 25395 - Mrs Paula Lennon [8506] 25398 - Mrs Debbie Stevens [8509] 25404 - Mr Craig Stevens [4958] 25408 - Mrs Malanie Sanders [8511] 25412 - Mr William A Smith [8512]				



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25413 - Mr John and Maureen Murrell [6846]				
25415 - Mr John and Maureen Murrell [6846]				
25417 - Mr John and Maureen Murrell [6846]				
25419 - Mr David Smith [4872]				
25421 - Mr John and Maureen Murrell [6846]				
25423 - Mr John and Maureen Murrell [6846]				
25425 - Mr Bryan Moreton [8513]				
25426 - Mr Bryan Moreton [8513]				
25430 - Mrs Anne Sands [8514]				
25432 - Mrs Gloria Moreton [8515]				
25434 - Mrs Karen Sullivan [8516]				
25436 - Mr Stephen Murrell [8517]				
25438 - Miss Wendy Schweitzer [8518]				
25440 - Mrs Lorraine Murrell [8519]				
25442 - Mr Sean Moore [8520]				
25444 - Mr Sean Moore [8520]				
25445 - Mrs Shui-Lin Moore [8521]				
25448 - Mr Graham Martin [8522]				
25452 - Hazel Mills [8523]				
25456 - Edward Mills [8524]				
25459 - Mr Anthony Nicholson [4709]				
25462 - Doddinghurst Infant School (Ms. Ingrid Nicholson) [4339]				
25466 - Mr Terry Sands [8525]				
25468 - Mr Gary Staples [8526]				
25470 - Mrs Jane Staples [8527]				
25472 - Mrs Margaret Saxton [4882]				
25474 - Mr David Saxton [4286]				
25476 - Mr M. Skidmore [1160]				
25478 - Mrs Elaine Stares [8528]				
25480 - Mrs Lesley Stone [8529]				
25482 - Mrs Debbie Martin [8530]				
25484 - Mrs Diane Mills [8533]				
25486 - Mr Peter Mills [6982]				
25488 - Mrs Lorraine Mitchell [8534]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25490 - Mr Steve Mitchell [8535]				
25492 - Stuart Moulder [4713]				
25494 - Mrs Carol Moulder [4719]				
25496 - Mrs Hilery Morse [8536]				
25498 - Mr Frank Stone [8538]				
25502 - Mrs Melanie Simpson [8539]				
25509 - Mrs Gladys Skinner [8540]				
25511 - Mr Peter Snelling [6960]				
25513 - Miss Carole Scott [8541]				
25515 - Mr Kenneth Sexton [4860]				
25517 - Mrs June Sexton [8542]				
25519 - Miss Faye McCarthy [8543]				
25521 - Mr Terence Stenning [8544]				
25524 - Mrs Ann Stenning [8546]				
25525 - Mr Chris McGovern [8545]				
25527 - Mrs Melanie Snelling [8547]				
25529 - Mrs Francesca McCarthy [8548]				
25535 - Mr. James Simpson [4462]				
25537 - Mr Tony Severn [8550]				
25542 - Mrs Gillian Romang [8107]				
25544 - Mrs Pauline Roberts [8551]				
25549 - Mrs Alison Ratcliffe [5040]				
25554 - Mr Richard Romang [6974]				
25556 - Mr Andrew Rothery [8552]				
25561 - Mrs Brigid Robinson [4897]				
25563 - Mrs Susan Rayner [8553]				
25565 - Mr Hugh Rayner [8011]				
25567 - Mr Lyn Robbins [8554]				
25569 - Mrs Lisa Rawlings [8555]				
25571 - Mr Geoffrey Rose [8556]				
25573 - Mrs Rosalind Rose [8557]				
25575 - Mrs Patricia Mountstevens [8559]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25577 - Mr Gerald Mountstevens [4911]				
25579 - Mr John Richardson [4858]				
25581 - Mr Neil Ratcliff [8561]				
25583 - Mr Peter Ryan [4937]				
25588 - Mr Simon Richardson [8562]				
25594 - Mr Clive Rosewell [8563]				
25596 - Mr Nicholas Rogers [8564]				
25601 - Mr Matthew Romang [8565]				
25607 - Mr David Rolfs [8566]				
25613 - Mrs Yvonne Rolfs [8567]				
25615 - Mrs Maureen Murrell [8560]				
25616 - Mr Brian Marchant [8569]				
25625 - Blackmore Village Heritage Association (Mr William Ratcliffe) [4874]				
25632 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921]				
25634 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921]				
25636 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921]				
25637 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921]				
25640 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921]				
25642 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921]				
25649 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921]				
25652 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921]				
25656 - Blackmore, Hook End				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
and Wyatts Green Parish Council (Parish Clerk) [1921] 25658 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921] 25660 - Blackmore, Hook End and Wyatts Green Parish Council (Parish Clerk) [1921] 25665 - Mrs Hazel Newcombe [8597] 25669 - Mr Colin Newcombe [8598] 25674 - Miss Charlotte Newton [8599] 25678 - Mrs Tina Newton [8600] 25680 - Mr Stephen Newton [8601] 25682 - Mrs Joan Marchant [8602] 25684 - Mrs Lesley Moss [7053] 25685 - Mr and Mrs Brian and Lesley Moss [2905] 25688 - Mr Barry Monery [8004] 25690 - Miss Jean Monery [8007] 25692 - Mrs Fleur Morgan [4848] 25699 - Mr Mark Morgan [4987] 25701 - Mr & Mrs John & Linda Hornett [8604] 25703 - Mr Alan Moody [1825] 25705 - Mr Colin Miers [3959] 25707 - Mrs Gillian Mass [8605] 25709 - Mass and Co (Mr John Mass) [3669] 25715 - Mrs Caroline Parkin [8606] 25717 - Mrs Jill Pritchard [4269] 25719 - Miss Lisa Philips [8607] 25721 - Mr Hylton Palmer [8154] 25723 - Mrs. June Palmer [3739] 25725 - Mrs Julie Pounds [8608] 25727 - Mr Darryl Pounds [8609] 25729 - Mrs Irene Power [8610] 25730 - Mr Terence Power [8611] 25733 - Mrs Beth Pardoe [8613] 25735 - Mrs Janet Pincombe [8614] 25737 - Mrs Carol Poulton [8119]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25739 - Mr Stephen Poulton [8149]				
25741 - Ms Judith Phillips [8615]				
25743 - Mr Douglas Piper [603]				
25746 - Lloyd Piper [8616]				
25748 - Mrs Kay Parkinson [4599]				
25750 - Mrs Kay Parkinson [4599]				
25754 - Mr Christopher Parkinson [8617]				
25755 - Mr Christopher Parkinson [8617]				
25758 - Mr Michael Pegram [8618]				
25760 - Mr Christopher Parkin [8619]				
25762 - Mr Peter Pritchard [8620]				
25764 - Mr Andrew Pallet [1313]				
25766 - Mr Vessenin Paounov [8621]				
25768 - Mr David Pegram [8622]				
25770 - Ms Paula Pegram [8625]				
25772 - Mr James Pegram [8626]				
25774 - Mrs Tracy Goddard-King [8627]				
25776 - Ms Tina Harrington [4779]				
25778 - Ms Tina Harrington [4779]				
25780 - Ms Tina Harrington [4779]				
25782 - Ms Tina Harrington [4779]				
25784 - Ms Tina Harrington [4779]				
25786 - Mr Andrew Harris [8628]				
25792 - Mrs Pamela Bailey [8010]				
25807 - Mrs Mandy Hamilton [8633]				
25809 - Miss Lois Hamilton [8632]				
25811 - Mr Max Hamilton [8631]				
25813 - Fairview New Homes Ltd (Ms Faye Wilders) [8365]				
25815 - Mr Graham Hesketh [8634]				
25817 - Mrs Carol Holmes [4693]				
25826 - Miss Jade Hayes [8136]				
25837 - Lisa Houston [8636]				
25847 - Mr John Hughes [4500]				
25853 - Mr Thomas Hughes [8637]				
25860 - Mrs Gail Hughes [8638]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25867 - Mr Adam Hughes [8639]				
25872 - Mrs Sara Harris [8122]				
25874 - Mr Patrick Hinchin [6750]				
25876 - Mr Anthony Helliard [8640]				
25878 - MR ALAN BOWLAND [8121]				
25880 - Mrs Judith Bowland [8642]				
25882 - Mr Allan Hilliard [8641]				
25884 - Mr Ray Brooks [8643]				
25886 - Ms Kay Hewitt [8644]				
25889 - Miss Alison Bell [8646]				
25890 - Mrs Barbara Head [8645]				
25892 - Mr Dennis Holla [8647]				
25894 - Mr Andrew Borton [8648]				
25896 - Mr David Bennett [8649]				
25900 - Mr Peter Birch [8158]				
25904 - Mr Peter Bartrop [8650]				
25908 - Mrs Carol Bartrop [8651]				
25910 - Mr Luke Holmes [8652]				
25918 - Miss Ami Holmes [8653]				
25931 - Mrs Lucille Foreman [8574]				
25937 - Mr Colin Foreman [4394]				
25939 - Mr Kenneth Bailey [5045]				
25941 - Mrs Pauline Farthing [7120]				
25947 - Ms Deborah Cullen [4547]				
25949 - Mr Ben Holmes [8654]				
25957 - Mr Mark Holmes [8655]				
25965 - Mr Barry Coldham [8656]				
25968 - Mr John Caton [4881]				
25973 - Mrs Beryl Caton [8657]				
25977 - Mr Colin Holbrook [4759]				
25978 - Mr Eugene Cullen [8658]				
25986 - Mrs Janice Holbrook [4700]				
25993 - Hannah Cook [8659]				
25996 - Mr David Coates [8133]				
25999 - Mrs Clare Corby [8186]				
26000 - Mrs Shirley Holmes [8660]				
26011 - Mr James Corby [8661]				
26013 - Mr Alex Corby [8663]				
26015 - Hazel Cowing [2817]				
26017 - Miss Lucy Corby [8664]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26019 - Ms Julie Currey [8665]				
26021 - Mr Ken Holmes [8662]				
26032 - Ms Linda Cearns [5013]				
26034 - Mrs Louise Coldham [8666]				
26035 - Ms Julie Chandler [8352]				
26036 - Mrs Trina Chambers [8348]				
26038 - Ms Elaine Harris [8667]				
26040 - Mrs Nicola Holmes [8668]				
26048 - Malcolm Hurford [7304]				
26059 - Mrs Joann Cook [8669]				
26061 - Mr Tony Cook [8670]				
26063 - Mr David Chalkley [8671]				
26065 - Mr D. Cormack [1447]				
26069 - Mr John Bell [8672]				
26071 - Mr Gary Bedford [8673]				
26073 - Mrs Christine Bedford [8674]				
26075 - Mrs Kate Hurford [4275]				
26089 - Mrs Carole Cole [8675]				
26092 - Mr David Holland [8676]				
26109 - Mr James Hughes [8677]				
26119 - Mr. James Harris [8678]				
26124 - Mr Adam Harris [8679]				
26129 - Mrs Beverley Holla [8680]				
26132 - Mrs Hazel Town [4993]				
26137 - Mrs Jane House [8681]				
26140 - Mr Christopher House [8682]				
26142 - Miss Helen Sheard [8487]				
26144 - Ms Charlotte Hall [7147]				
26146 - Mrs Margaret Brooks [8683]				
26148 - Mr Kevin Hall [6734]				
26151 - Mrs Gillian Hall [8684]				
26154 - Mr David Hall [4867]				
26159 - Laura Harris [8685]				
26164 - Susan Harris [8686]				
26166 - Mr Reginald Dawson [8687]				
26168 - Mr John Eaton [8124]				
26170 - Mr Stephen Holland [8689]				
26173 - Mr Michael Jones [8690]				
26182 - Mr Ken Holmes [8691]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26183 - Mrs Janet Jacobs [8692]				
26185 - Mrs Catherine Jennings [8693]				
26187 - Mrs Louise Woodford [8398]				
26189 - Mrs. Susan Miers [8695]				
26193 - Mr Conrad Dixon [8688]				
26195 - Mr John Eaton [8124]				
26197 - Cariss Tsui [8694]				
26201 - Mrs Jacqueline Owen [4760]				
26203 - Ms Pauline Barry [8699]				
26205 - Mr Ron Beazley [4831]				
26208 - Mrs Eileen Beazley [8700]				
26209 - Mrs Christina Atkins [8118]				
26211 - Mr Neil Beney [8701]				
26213 - Mrs Christina Atkins [8118]				
26215 - Mrs Christina Atkins [8118]				
26217 - Mrs Christina Atkins [8118]				
26219 - Mrs Christina Atkins [8118]				
26223 - Mrs Christina Atkins [8118]				
26226 - Mr John Caton [4881]				
26227 - Mrs Christina Atkins [8118]				
26229 - Mrs Christina Atkins [8118]				
26234 - Mrs Christina Atkins [8118]				
26236 - Mrs Danielle Cross [7016]				
26238 - Mrs Christina Atkins [8118]				
26240 - Mrs Christina Atkins [8118]				
26245 - Mrs Susan Capes [8702]				
26247 - Mr Joseph W E Atkins [8703]				
26249 - Mr Joseph W E Atkins [8703]				
26254 - Mr Joseph W E Atkins [8703]				



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26257 - Mrs Beryl Caton [8704]				
26258 - Mr Joseph W E Atkins [8703]				
26260 - Mr Joseph W E Atkins [8703]				
26262 - Mr Steven Corby [8705]				
26263 - Mr Joseph W E Atkins [8703]				
26266 - Mr Joseph W E Atkins [8703]				
26268 - Mr Joseph W E Atkins [8703]				
26269 - Mr Joseph W E Atkins [8703]				
26272 - Mr Joseph W E Atkins [8703]				
26274 - Mr Joseph W E Atkins [8703]				
26279 - Mr Michael Williams [8706]				
26284 - Mrs Julie Ann Williams [8707]				
26286 - Mr Jon Watson [7112]				
26289 - Mr John Wollaston [8183]				
26293 - Mr Neil Warner [8709]				
26297 - Mrs. Gillian Warner [8710]				
26299 - Ms Nicoltte Unwin [8711]				
26301 - Mr Alex Atkins [8126]				
26303 - Ms Hayley Atkins [8712]				
26305 - Ms Margaret Allan [8713]				
26307 - Mr John Allan [8714]				
26309 - Mr Christopher J Atkins [8715]				
26311 - Mr Paul Anthony [6823]				
26314 - Mrs Lorraine Wisdom [8718]				
26316 - Mr Thomas Bury [8717]				
26318 - Ms Lynn Baggott [8721]				
26320 - Mr Alan Bird [8722]				
26325 - Ms Maria J Bennett [8723]				
26332 - Mrs Sandra Wood [8720]				
26334 - Mr Robert J Brittleton [8724]				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
26336 - Mrs Kelly BRITTLETON [8097]				
26338 - Mr & Mrs Melvin & Joy Wright [8725]				
26340 - Mrs. P. Bakdwin [8726]				
26342 - Mrs Jeannette Butcher [8727]				
26344 - Mr Michael Black [1291]				
26346 - Mrs Ruth Black [8728]				
26348 - Mr Cliff Black [8729]				
26350 - Mrs Janet Birch [8730]				
26354 - Mr Arthur Birch [4769]				
26358 - Mrs Maureen Butler [5017]				
26360 - Mrs Beryl Burgess [5030]				
26377 - Mrs Kim Barber [8731]				
26385 - Mr. Colin Barber [919]				
26387 - Mr Martin Clark [2456]				
26392 - Mrs Anita Clark [8168]				
26394 - Mr John Adkins [8734]				
26398 - Ms Anne Adkins [8735]				
26401 - Ms Elizabeth Arthur [8736]				
26403 - Ms Mandy Anthony [8737]				
26410 - Mrs Ella Bradley [4875]				
26412 - Mr. Gordon John Beman [8739]				
26414 - Mr. Robert Beeching [3839]				
26416 - Mr Peter Burgess [4863]				
26419 - Ms Margaret Boreham [8033]				
26422 - Mr David Baines [8740]				
26431 - Mrs Rachel Caward [8742]				
26432 - Mr Lee Caward [8741]				
26442 - Mr Timothy Hogan [7309]				
26447 - Mrs Wendy Dunbar [8743]				
26449 - Mr Reginald Dawson [8744]				
26451 - Mr Lewis Pincombe [8745]				
26453 - Mrs Lindsey Pavitt [8746]				
26455 - Mr Anthony Pavitt [8747]				
26460 - Mr John Orbell [4805]				

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
26464 - Mrs Karen York [8748] 26467 - Cllr Roger Keeble [1990] 26493 - Mr Surinder Panesar [8749] 26494 - Mrs Annabelle Panesar [8750] 26499 - Mrs Linda Watkinson [4984] 26502 - Ms Lesley Whan [8751] 26507 - Mr John Fowles [8373]				
		<i>Removal of proposed developments R25 and R26 from the plan and reallocation of the 70 dwellings to more suitable brownfield sites in the borough. Support the aims of the Blackmore Village Heritage Association and the Blackmore Village "Neighbourhood Plan"</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22689 - Mr Richard Swift [1747] 22691 - Mr Richard Swift [1747] 22694 - Mr Richard Swift [1747] 22695 - Ms Virginia Stiff [1748] 22699 - Ms Virginia Stiff [1748] 22700 - Ms Virginia Stiff [1748] 22701 - Ms Virginia Stiff [1748] 22703 - Mrs Christine Blythe [4718] 22706 - Mrs Christine Blythe [4718]	Support	Support Policy R26 to release this site from the Green Belt to provide new homes for first time buyers, local residents and for those wishing to downsize without leaving Blackmore. The village will lose its vitality and potentially current services if it doesn't continue to thrive. The site North of Orchard Piece has good natural barriers and is only a short walk to the centre of the village. Redrose Lane represents the edge of the settlement. We have never experienced surface water flooding since 1956 on this site. A development in this site will actually improve the water management in this area. Locally based, Crest Nicholson has won national awards for the standard of its housing design and landscaping and has the expertise and capacity to deliver housing which is lacking in the local area. All the relevant evidence has been considered for this plan, taking into account all the constraints that have had to be taken into account. This site is a logical extension to the existing settlement boundary of Blackmore. It would represent limited release of Green Belt land to meet local needs to 2033 and ensure Blackmore village remains a vital "inclusive, balanced, sustainable community" (S03). The site was first supported in the SHLAA (2010) and in the Draft Site Assessment (July 2013) Ref G070A. During the past 50 years, very little housing has been allowed in the village and, given the population has increased by a third during this time, I believe now is the time to allow other families to benefit from being able to live in the village. Have known this land for 60 years and have never known it to flood.  <i>No change proposed</i>	Noted	No further action
22690 - Mr Richard Swift [1747]	Support	There has been no new development in Blackmore for almost 50 years, I imagine many local people would want to be able to move to a new modern home and remain close to their roots.  <i>No change proposed</i>	Noted	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.201</b>				
22224 - Mr Peter Drew [8212]	Object	<p>I do not agree with building on green belt land. The infrastructure currently will not support the increase in housing planned. The doctors surgery can not cope now with the population locally.</p> <p><i>I do not agree that local transport is sustainable in the future. The local bus was threatened recently. The doctors can not cope with the current population, increasing the housing will only make the situation worse.</i></p>	Through gathering evidence in support of the Local Plan, the Council has not identified infrastructure issues that would prevent delivery of the number of homes proposed at site R25 (see Infrastructure Delivery Plan). This includes engagement with the NHS regarding healthcare facilities.	No further action
22257 - mr Steve Whalley [4328]	Object	<p>A housing needs survey has not been done. The council has not shown that there is a housing need locally or the quantity and type of housing needed.</p> <p>Changes to Plan: Undertake a local housing needs survey for the Villages in the north of the Borough and use the evidence from that to plan for local housing development.</p> <p><i>Undertake a local housing needs survey for the Villages in the north of the Borough and use the evidence from that to plan for local housing development. Remove site R26 from the plan</i></p>	The housing needs of the borough have been evidenced and the Council is proposing a spatial strategy to meet that need, which includes some development in villages such as Blackmore in order to provide a flexible supply of locations for new development to meet needs, as required by the NPPF (see NPPF paragraph 68).	No further action
<b>9.202</b>				
22199 - Mrs Helen Whalley [8199]	Object	<p>A housing needs survey has not been done. The council has not shown that there is a housing need locally or the quantity and type of housing needed.</p> <p><i>Undertake a local housing needs survey for the Villages in the north of the Borough and use the evidence from that to plan for local housing development.</i></p>	The housing needs of the borough have been evidenced and the Council is proposing a spatial strategy to meet that need, which includes some development in villages such as Blackmore in order to provide a flexible supply of locations for new development to meet needs, as required by the NPPF (see NPPF paragraph 68).	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.203</b>				
22494 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Paragraph 9.203 makes reference to the main vehicular access for the site to be via Redrose Lane. ECC 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.</p> <p><i>Amend paragraph 9.203 as follows - The development will take its main vehicular access from Orchard Piece and/or Fingrith Hall Lane...'</i></p>	<p>The policy wording is attempting to ensure that a safe and appropriate access can be achieved to the site. This justification text reflects this. The Highways Authority notes that vehicle access via Red Rose Lane may not be able to meet highways standards. In this case an amendment to add for the potential for vehicle access via Orchard Piece or Fingrith Hall Lane is proposed. Further assessment will be required through a planning application to determine the most appropriate access point in consultation with the Highways Authority.</p>	<p>Amend justification text (para 9.203) to "The development will consider an appropriate main vehicular access via Redrose Lane, Orchard Piece or Fingrith Hall Lane".</p>
22200 - Mrs Helen Whalley [8199] 22259 - mr Steve Whalley [4328]	Object	<p>This proposed main vehicular access from Red Rose Lane is completely unsuitable for this volume of traffic due to its narrow and rural nature. To alter this old rural road would not be appropriate to the rural setting of the area. Section 2.10 of the Settlement Hierarchy chapter of the LDP states 'Development should be appropriate to the rural setting of the area'. Red Rose Lane is unsuitable for this volume of traffic because it floods regularly. The three junctions with faster main roads are not suitable for this volume of traffic. I am concerned that there would be accidents. Avoid changes to the rural setting of Red Rose Lane. Avoid an increase in the volume of traffic on/off Red Rose Lane. Avoid an increase in the volume of traffic at the junctions of Red Rose Lane and the main roads. Avoid an increase in the volume of traffic on Red Rose Lane which floods regularly.</p> <p><i>Remove R26 from the plan</i></p>	<p>The appropriateness of Red Rose Lane for vehicular access to the site is being discussed with the Highways Authority, Essex County Council. Further assessment suggests that a more appropriate vehicle access could be achieved via Orchard Piece or Fingrith Hall Lane.</p>	<p>Amend justification text (para 9.203) to "The development will consider an appropriate main vehicular access via Redrose Lane, Orchard Piece or Fingrith Hall Lane".</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Brentwood Enterprise Park</i>				
22499 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Request additional paragraph after paragraph 9.210 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>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 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. It should however be ensured that any development within this area complies with flood risk mitigation measures outlined in the Essex SuDS guide.</i></p>	This requirement is already covered under Policy NE06 Flood Risk and therefore not considered necessary to add to supporting text of Policy E11.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY E11: BRENTWOOD ENTERPRISE PARK</i></b>				
22501 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Criterion D. b. of Policy E11 refers to potential access points via M25 Junction 29 and Warley Street (B186) and associated slip roads. Currently unclear how access to site can be achieved directly from J29 of M25 as consequence of Lower Thames Crossing improvements to this junction, which includes segregated left turn slip road from A127 to M25 southbound. BBC therefore need to demonstrate that can achieve suitable access arrangements for all modes of travel, including appropriate mitigation/improvements. BBC should also demonstrate what discussions have taken place with Highways England, ECC as Highway Authority, and site promoter to ensure that access arrangements are deliverable and agreed.</p> <p><i>BBC need to demonstrate that suitable access arrangements for all modes of travel can be achieved, including appropriate mitigation/improvements. BBC should also demonstrate what discussions have taken place with Highways England, ECC as Highway Authority, and the site promoter to ensure that access arrangements are deliverable and agreed.</i></p>	<p>The Council has been engaged with Essex County Council as highways authority regarding the potential to access Brentwood Enterprise Park from the B186 (Warley Street). This would resolve the closure of the existing access at M25 junction 29 as a result of Lower Thames Crossing and remove any concerns from Highways England regarding the access as part of the strategic highway network. In order to achieve a compliant access scheme according to highways safety requirements, a request has been made to Essex County Council to lower the speed limit on this section of the B186 south of the A127. This is in line with the South Brentwood Growth Corridor sustainable transport vision, which sets out a vision and principles for lowering speed limits in the area, among other things, as part of ensuring transport infrastructure contributes to improved place-making for existing and new communities. The landowner and promoter for Brentwood Enterprise Park is engaged with Essex County Council on the details of how this access could be provided subject to reduced speed limit. The Council will continue to engage with partners regarding infrastructure delivery and resolve specific issues through statements of common ground.</p>	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23163 - Thurrock Borough Council (Mr Richard Hatter) [2461]	Object	It is unclear why the employment sites at Brentwood Enterprise Park (Site ref E11), Land at East Horndon Hall (site E13) and at Dunton Hills Garden Village (Site ref RO1) are proposed in the pre-submission Local Plan. It is not always the case that employment land should be located at busy junctions or along the A127 corridor where it would add to traffic flows on a road at current capacity. The sites are not located close to existing centres and are without easy access for workers other than by car. Alternative locations and options should be investigated including the A12 corridor possibly as part of edge of settlement expansion and in mixed use schemes; in principle objection due to Green Belt impact; impact of this combined with the Lower Thames Crossing.	The Council's proposed spatial strategy is to focus on our transport corridors as sustainable places to grow. These corridors flow through constrained urban areas as well as Green Belt. The Council is not able to fully meet the development needs of the borough without considering land currently within Green Belt. Development locations are proposed in both the Central Brentwood Growth Corridor and South Brentwood Growth Corridor, with reasonable alternatives tested through the Sustainability Appraisal. The Council is reluctantly proposing to release Green Belt locations in order to meet development needs. This includes the provision of jobs at Brentwood Enterprise Park in a location that maximises the strategic highway network in terms of its relationship with Greater London and the wider south east, but is also based on applying sustainable transport principles through the South Brentwood Growth Corridor sustainable transport vision, which has included engagement from relevant authorities (including Thurrock Borough Council), stakeholders, and site promoters. The principles are set to encourage sustainable transport modes and reduce the reliance on single occupancy vehicles. This work is considered through the Brentwood Local Plan Transport Assessment that sets out the cumulative traffic impacts from proposed growth, including the Lower Thames Crossing. This work informs engagement with c2c Rail regarding the role of rail infrastructure and West Horndon station, including shared cross boundary implications of growth with Thurrock Borough Council and the joint discussions that have taken place. Policy E11 allows for supporting employment uses that would be consistent with the alternative suggestion of a service station in this location. The Council is committed to joint working as part of the Association of South Essex Local Authorities (ASLEA) and efforts to produce a South Essex Joint Strategic Plan (JSP), which is to consider growth options across the wider A127 corridor. The Brentwood Local Plan commits to a review of the Plan once the JSP is in place to inform future growth locations in the area. In the meantime, Brentwood Borough Council is tasked with meeting the development needs of the borough in order to	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p><i>It is considered that site E11 should be deleted from the plan. Notwithstanding our principle objection on greenbelt and sustainability issues if the site is proposed for development an alternative use that capitalize on its M25 location (i.e. a service station) could be considered. It is considered the Brentwood Draft Local Plan and supporting evidence base will require further major revision and consultation with ongoing duty to cooperate with adjoining local authorities. In particular the preparation of the draft Brentwood Local Plan should be reviewed to take account of the outcome of testing of other spatial options being considered including the evidence by the South Essex authorities as part of the preparation of a Joint Strategic Plan. Further work is required to develop the evidence base including the justification for the selection of the spatial options and dismissal of reasonable alternatives, housing capacity and supply further transport evidence and other infrastructure. Due to the issues highlighted in this response and to the earlier documents it is considered that Brentwood Council needs to carefully consider how it proceeds with the preparation of the Local Plan and the timetable for its production. It is recommended that the Brentwood Plan with its current spatial strategy and site allocations should not be submitted for Examination.</i></p>	<p>provide new homes and jobs. The Council will continue to engage with partners regarding infrastructure delivery and resolve specific issues through statements of common ground.</p>	
23627 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	<p>The Authority has offloaded its housing and other needs to an edge of the Borough where a neighbouring borough will shoulder the infrastructure burden. And that the Authority has ignored the fact that the infrastructure on the Basildon-Southend corridor cannot realistically be improved.</p> <p><i>Remove Dunton Hills Garden Village and the Brentwood Enterprise Park from plan.</i></p>	<p>Strategic development in the south of the borough is planned at a scale that will be self-sustaining. The Council has set a series of principles for the development to achieve sustainable transport measures through better linkage with one another and West Horndon station as a public transport hub. The Council will continue to engage with neighbouring local, planning authorities and other relevant stakeholders regarding the cross-boundary impacts of development.</p>	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23623 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	<p>The Authority deemed the erection of temporary buildings on a small part of Codham Hall Farm (south of the A127) as inappropriate development in the Green Belt and yet is proposing Brentwood Enterprise Park on the same site occupying about ten times the area.</p> <p><i>In order to make the Plan justified Brentwood Enterprise Park should be removed from the Plan, and employment growth re-allocated to a site or sites in the Borough where the development would not detract from the openness of the Green Belt.</i></p>	The Council's proposed spatial strategy is to focus on our transport corridors as sustainable places to grow. These corridors flow through urban areas and Green Belt. The Council is not able to fully meet the development needs of the borough without considering land currently within Green Belt.	No further action
22579 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Object	<p>Policy wording is ambiguous and lacks a commitment to deliver biodiversity net gain.</p> <p><i>Policy wording should be amended as follows (removing the caveat "where appropriate"):</i></p>	Noted. No changes proposed to policy but will update Policy NE01 Protecting and Enhancing the Natural Environment in line with the NPPF requirements for securing net gains for biodiversity.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23184 - London Borough of Havering (Mr Martyn Thomas) [7966] 23185 - London Borough of Havering (Mr Martyn Thomas) [7966]	Object	<p>The Local Plan does not evidence why the Brentwood Enterprise Park would be an acceptable use at an important location in the Green Belt. E11 adjoined the A127, a key route into Havering and intersects with the A12 at Gallows Corner. The A127 is already well trafficked, Gallows Corner is already highly congested and has environmental problems. The extent of development along the A127 corridor was previously objected in principle. Policy E11's reasoned justifications include potential access points via Junction 29 and the expectation of development to mitigate its impacts on the local and strategic road network, this does not adequately address its implications on the wider highway network.</p> <p><i>Policy PC03 Employment Land Allocations, Policy E11 Brentwood Enterprise Park and Site Allocation E11 Brentwood Enterprise Park should be amended: * to demonstrate why the proposal is compliant with the National Planning Policy Framework * to provide explicit commentary on the likely significant implications of the proposal for the wider strategic highway network given the proximity to Havering * to recognize the importance of working with other stakeholders (such as Transport for London and London Borough of Havering so that there can be certainty that the impacts of the Brentwood Enterprise</i></p>	<p>The Council's proposed spatial strategy is to focus on our transport corridors as sustainable places to grow. These corridors flow through constrained urban areas as well as Green Belt. The Council is not able to fully meet the development needs of the borough without considering land currently within Green Belt. Brentwood Borough also faces congested roads and well trafficked junctions like the London Borough of Havering. Therefore, the Council has considered how future growth can avoid exacerbating these issues as part of a sequential approach to selecting growth locations and then applying sustainable transport principles. The Council has prepared the South Brentwood Growth Corridor sustainable transport vision with engagement from relevant authorities (including London Borough of Havering), stakeholders, and site promoters. The principles are set to encourage sustainable transport modes and reduce the reliance on single occupancy vehicles. This work is considered through the Brentwood Local Plan Transport Assessment that sets out the cumulative traffic impacts from proposed growth. This work informs engagement with c2c Rail regarding the role of rail infrastructure and West Horndon station. Alternative access arrangements to Brentwood Enterprise Park are being discussed with the local highways' authority Essex County Council in recognition of the Lower Thames Crossing proposals at M25 junction 29 and ongoing discussion with Highways England. The Council will continue to engage with partners regarding infrastructure delivery and resolve specific issues through statements of common ground.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>Park proposal are satisfactory and can be accommodated without any adverse impact on the network beyond Brentwood * to recognize the role of the established joint working between authorities along the A127 corridor to ensure that the significant growth along this corridor is understood, assessed and mitigated as necessary. * to recognize the merit of the preparation of a Statement of Common Ground or Memorandum of Understanding between relevant stakeholders to recognize the issues involved and set out a joint commitment to recognizing these and addressing them * to recognize that the scale of the Brentwood Enterprise Park proposal and the traffic it will generate is likely to have significant adverse environmental impacts for the wider area (including Havering) and that these need to be considered and mitigated * to include cross reference to Policy BE11 Strategic Transport Infrastructure</p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23200 - Highways England (Heather Archer) [8309]	Object	<p>Highways England has concerns in regards to the Local Plan developments impacts on the Strategic Road Network. Although policies BE11 and BE16 identify the need that "any significant impacts from the development on the highway network on highway safety must be effectively mitigated to an acceptable degree". The transport impacts of Dunton Hills and the Brentwood Enterprise Park site policies imply that they will be assessed in isolation. This assessment should be done as part of the wider Local Plan picture.</p> <p><i>For clarity, we suggest that the wording is amended to reflect that there is a need to mitigate the impacts of the full Local Plan rather than the developments within it individually. Any single development may have no discernible impact whereas cumulatively the Local Plan impacts may require mitigation. Accordingly we are looking for evidence on the cumulative impacts of the Local Plan. Similarly, you may wish to amend the wording of policies relating to individual allocations, particularly the strategic allocations for Dunton Hills in Policy R01 (ii) under Transport Impact Mitigations and Brentwood Enterprise Park in Policy E11. These two policies suggest that impacts for these two developments will be assessed in isolation rather than as part of a bigger Local Plan picture.</i></p>	<p>Noted. The policy is worded to ensure individual sites are required to demonstrate their impact on the highway network and adequately mitigate this. However, through the Local Plan Transport Assessment and, in this case in the south of the borough, the South Brentwood Growth Corridor sustainable transport vision, the Council has worked with highways authorities (including Highways England) and site promoters to understand the cumulative impacts of growth and resulting mitigation required. This is then reflected in the IDP. Through continued engagement the Council is committed to resolving outstanding issue with statements of common ground, and set out the apportionment of costs and implications for phasing of development with site promoters and relevant partners.</p>	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23624 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	<p>The Authority has sought to justify the location of Brentwood Enterprise Park on the basis that the site would occupy previously developed land. But the land has not been developed. Temporary permission was granted in 2010 for the use of a small portion (about 3 ha) of this site for the storage and distribution of excavated material. This was to enable a company to fulfil a contract to replace all the gas mains from Southend-on-Sea to East London. A larger area has been used, again on a temporary basis, as the depot for the widening of the M25. The position underlying these temporary uses is that the site will return to its original state. Yet in paragraph 9.205 of the Plan the Authority describes the site as previously developed land. In treating the Brentwood Enterprise Park site as developed land the Authority has based its decision on distorted evidence.</p> <p><i>In order to make the Plan justified Brentwood Enterprise Park should be removed from the Plan, and employment growth should be re-allocated to a site elsewhere in the Borough that has genuinely already been developed or is otherwise suitable.</i></p>	<p>The Council's proposed spatial strategy is to focus on our transport corridors as sustainable places to grow. These corridors flow through urban areas and Green Belt. The Council is not able to fully meet the development needs of the borough without considering land currently within Green Belt. When considering Green Belt the Council has sought a sequential approach informed by the spatial strategy, including to consider land in Green Belt that has been previously developed before greenfield land in the Green Belt. The planning history of land at the proposed Brentwood Enterprise Park has shown evidence of temporary development uses, some of which are currently in place. Therefore, the site is considered to be previously developed land.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23186 - London Borough of Havering (Mr Martyn Thomas) [7966]	Object	<p>The proposal should highlight the joint working taking place between authorities along the A127 corridor because this is an important means to the various authorities ensuring the scale and timing of development along the corridor is taken into account. Havering strongly supports the work of the A127 Task Force group of authorities and interested parties in lobbying for improvements to the A127 Corridor in the recognition of the growth planned along it.</p> <p><i>Policy PC03 Employment Land Allocations, Policy E11 Brentwood Enterprise Park and Site Allocation E11 Brentwood Enterprise Park should be amended: * to demonstrate why the proposal is compliant with the National Planning Policy Framework * to provide explicit commentary on the likely significant implications of the proposal for the wider strategic highway network given the proximity to Havering * to recognize the importance of working with other stakeholders (such as Transport for London and London Borough of Havering so that there can be certainty that the impacts of the Brentwood Enterprise Park proposal are satisfactory and can be accommodated without any adverse impact on the network beyond Brentwood * to recognize the role of the established joint working between authorities along the A127 corridor to ensure that the significant growth along this corridor is understood, assessed and mitigated as necessary. * to recognize the merit of the preparation of a Statement of Common Ground or Memorandum of Understanding between relevant stakeholders to recognize the issues involved and set out a joint commitment to recognizing these and</i></p>	<p>Noted. Brentwood Borough Council also supports the work of the A127 Economic Task Force and work to ensure investment is secured to improve the A127 in recognition of planned growth along the wider corridor. Growth planned through the Brentwood Local Plan in the south of the borough has been subject to the consideration of applying sustainable transport principles. The Council has prepared the South Brentwood Growth Corridor sustainable transport vision with engagement from relevant authorities (including London Borough of Havering), stakeholders, and site promoters. The principles are set to encourage sustainable transport modes and reduce the reliance on single occupancy vehicles. This work is considered through the Brentwood Local Plan Transport Assessment that sets out the cumulative traffic impacts from proposed growth. This work informs engagement with c2c Rail regarding the role of rail infrastructure and West Horndon station. The Council will continue to engage with partners regarding infrastructure delivery and resolve specific issues through statements of common ground.</p>	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		addressing them * to recognize that the scale of the Brentwood Enterprise Park proposal and the traffic it will generate is likely to have significant adverse environmental impacts for the wider area (including Havering) and that these need to be considered and mitigated * to include cross reference to Policy BE11 Strategic Transport Infrastructure		
23625 - Dunton Community Association (Mr Edward Cowen) [6185] 23626 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	DHGV, with Brentwood Enterprise Park and the East Horndon employment area, would further reduce the narrowest and most critical section of the Metropolitan Green Belt, would promote the coalescence of Southend with London, together with the series of employment sites proposed on the A127 corridor would constitute ribbon development, would interfere with the edges of the Green Belt as proposed would replace a strong Green Belt boundary with a weak one, does not exhibit any of the four characteristics that indicate potential suitability for Green Belt boundary adjustment and that breaking the circle of open land around London would be unlawful. This development would frustrate the objectives of the Thames Chase Community Forest.	The Council's proposed spatial strategy is to focus on our transport corridors as sustainable places to grow. These corridors flow through urban areas and Green Belt. The Council is not able to fully meet the development needs of the borough without considering land currently within Green Belt. Green Belt evidence shows that this is not the narrowest section of Green Belt in the borough. Parcels of Green Belt have been tested according the purposes of Green Belt set out in the NPPF, there is no evidence locations for growth are considered the most critical areas of Green Belt. The Council does not believe that development locations result in or promote coalescence. The Council continues to engage with the Thames Chase Community Forest regarding this area and has specified policies regarding the natural environment in the Local Plan (see policies NE01 - NE15), including a specific policy regarding Thames Chase Community Forest (NE04).	No further action
		Remove Dunton Hills Garden Village and the Brentwood Enterprise Park from plan.		

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
22329 - Essex Bridleways Association (Mrs Sue Dobson) [3855]	Object	<p>Retain and enhance the existing bridleway on site and ensure traffic safety measures on A127 bridge.</p> <p><i>It is imperative that these bridleways are preserved and the link over the A127 made safer as these two sites are to be developed, thereby increasing the volume of traffic using them. These bridleways serve to link two networks severed by the M25 and A127 and allow access to those living to the south and south west of the site to access Great Warley and Thorndon beyond.</i></p>	<p>Noted. Policies E10 Codham Hall Farm and E11 Brentwood Enterprise Park require that development proposals preserve and where appropriate enhance the public right of way through the sites. The Council will continue to engage with the bridleways Association regarding the nature of enhancements through as specific development proposals emerge.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23744 - St Modwen Properties PLC [5124]	Support	<p>The latest Lower Thames Crossing proposals include potential slip roads at Junction 29 and would therefore conflict with both the existing and currently proposed access arrangements for the BEP. Certain land around junction 29 and the A127 will likely be needed for transport works should the LTC project proceed, as shown in our Appendix B. Accordingly, Policy E11 wording should be amended to acknowledge the above access options and to provide for the land to be released from Green Belt for such purposes should that be required. This approach has been used in East Herts District.</p> <p><i>Appendix 2 of the Plan should be amended having regards to the map in our Appendix B which shows the additional land that may be necessary to be released from the Green Belt in order for it to be developed for transport works to facilitate access to the BEP Site. The first paragraph of Policy E11 should be amended to read as follows: "Land south east of M25 Junction 29, as shown on Appendix 2, is allocated to provide high quality employment development and a significant number of jobs. In addition, the areas of land (shown on the plan at Appendix 2) shall be released from the Green Belt for works to provide access to the site should this be necessary. The final extent of the land that is released for such works shall be identified in a planning application and shall be kept to the minimum necessary to provide an appropriate and safe access to the Brentwood Enterprise Park Site along with any associated highway and infrastructure works. Development proposals for the Brentwood Enterprise Park site should consider the following: [...]"</i></p>	The Council is keen to ensure only required land to meet development needs is removed from the Green Belt. Whilst it is acknowledged that development requires suitable access, if removed from the Green Belt this potentially could unlock land for development that is not currently planned. The Council is committed to continued working with site promoters and relevant stakeholders to achieve the delivery of development in a suitable way.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23733 - St Modwen Properties PLC [5124]	Support	<p>We do not concur with part C d) of Policy E11, which requires that the public right of way is preserved and enhanced. Whilst it is recognised that the right of way will need to be maintained, this may be through appropriate diversion if required. The policy wording presently is ambiguous in this regard and may imply that the right of way must be preserved in its current form. This could pose a risk to delivery and would not be a justified and effective approach.</p> <p><i>Request that sub-paragraph 'd.' of part C of Policy E11 be amended so that it reads as follows:</i>  <i>"preserve, through diversion if necessary, and where appropriate enhance the existing Public Right of Way through the site".</i></p>	<p>It is considered that the requirement to preserve existing rights of way relates to the continuation of accessibility rather than specific route. The potential for enhancement may be presented if development requires a diversion of public right of way, but this would need to be justified and deemed necessary for the facilitation of development. The rights of way on site are generally located to the boundary of the Brentwood Enterprise Park site and crossing the A127.</p>	No further action
23735 - St Modwen Properties PLC [5124]	Support	<p>References to infrastructure requirements in part D. c., d. and e. should be amended to make clear that such provision will be required where appropriate. The wording is overly prescriptive and lacks flexibility would not therefore be a justified and effective approach. It may not, for example, be appropriate to provide direct walking connection towards junction 29 and the western site boundary. The site should not be responsible for provision of new transport links alone. The implementation of a wider strategy for sustainable travel and public transport should be delivered by appropriate local authorities, with relevant contributions sought from developers.</p> <p><i>We consider this part of the policy should be amended to read: c. provide well-connected internal road layouts which allow good accessibility for bus services or sustainable transport measures where appropriate d. potential travel planning measures and connection to new public transport links with the surrounding area; and e. provision for walking and cycling connections within the site and to the surrounding area where appropriate</i></p>	<p>The policy requirements for good accessibility provision are not considered to be overly prescriptive. The requirements set the principle for how people should be able to walk and cycle through the site and connect throughout with public transport options. This is supported by the Council's work on the South Brentwood Growth Corridor sustainable transport vision, of which site promoters and stakeholders have been involved in preparing. This Council acknowledges that there will be a range of delivery mechanisms for the delivery and funding of transport infrastructure. The Council will continue to engage with partners and site promoters regarding infrastructure delivery and resolve specific issues through statements of common ground.</p>	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23282 - Wood (on behalf of National Grid) (Ms Lucy Bartley) [8094]	Support	The site is crossed or in close proximity to an electricity transmission asset: ZB Route. Please see enclosed plan referenced ET329 (GT113). The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect its assets.	Noted. The Council will continue to engage with the National Grid regarding specific development proposals at Brentwood Enterprise Park.	No further action
23741 - St Modwen Properties PLC [5124]	Support	Transport and Access: The BEP Site allocation is ideally located to provide direct access to the strategic road network for the commercial vehicles generated by the proposed business uses on site. Access to the strategic road network for BEP which is compatible with the LTC proposals for J29 is achievable, and therefore the allocation of the BEP is not compromised by the LTC. Fundamentally however, the allocation of sites including BEP, Childerditch Industrial Estate, West Horndon and DHGV along the A127 all make a strong business case for the implementation of a robust and efficient package of sustainable transport measures.	Noted	No further action
23738 - St Modwen Properties PLC [5124]	Support	Landscape Sensitivity and Landscape Capacity Study: Potential and Strategic Allocation Options report by Crestwood considers the Site E11 within the Low Landscape Character Area and to have high capacity for development. It is considered the plan has been positively prepared in the way it has considered and identified sites that have are shown to have capacity in terms of effect on the surrounding landscape.	Noted	No further action

<i><b>Representations</b></i>	<i><b>Nature</b></i>	<i><b>Summary of Main Issue/Change to Plan</b></i>	<i><b>Council's Assessment</b></i>	<i><b>Action</b></i>
23737 - St Modwen Properties PLC [5124]	Support	Removal of Site from the Green Belt: The NPPF does not define what constitutes 'exceptional circumstances'. However, case law may assist BBC and the preparation of its Local Plan in this respect, in particular, the judgment in Calverton Parish Council v Nottingham City Council & Ors. [2015] EWHC 1078. BBC has evidenced a substantial need for development; and there are clearly severe limitations on options to meet this need without altering the Green Belt. Exceptional circumstances in accordance with the NPPF and the Calverton judgment have been demonstrated to justify amending the Green Belt boundary to remove the site	Noted	No further action
23309 - Greater London Authority (Mr Jörn Peters) [6093]	Support	We note the significant allocation of additional employment land, in particular through the Brentwood Enterprise Park. In the light of its proximity to London, it could be useful to discuss related collaboration opportunities, specifically including land for distribution and logistics, as well as wider sustainability implications.	The Council will continue to engage with the Greater London Authority regarding specific development proposals at Brentwood Enterprise Park and wider aspirations for the South Brentwood Growth Corridor.	No further action
23285 - Wood (on behalf of National Grid) (Ms Lucy Bartley) [8094]	Support	Site is crossed or in close proximity to National Grid gas transmission asset FM18. Please see enclosed plan referenced GT113 (ET329). The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.	The Council will continue to engage with the National Grid regarding specific development proposals at Brentwood Enterprise Park	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23740 - St Modwen Properties PLC [5124]	Support	<p>Modification in terms of jobs provision needed. The Economic Futures states that Brentwood Enterprise Park will provide a total of 4,070 new jobs. We do not consider this figure to be justified, principally because it is based on an over-assumption of the amount of office space that may be provided. The number of jobs will depend on final mix of uses however estimates based on employment density guidance indicates in the region of 2,000 jobs, due mainly to the lower estimation for the amount of office space to be provided by the scheme.</p> <p><i>Estimated number of jobs that Brentwood Enterprise Park can provide, based on employment density guidance, is in the region of 2,000 jobs.</i></p>	Noted	No further action
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9.206				
22496 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>BBC needs to satisfy itself that Local Plan has clear economic strategy, with robust phasing and delivery mechanisms in place to ensure that full employment requirements can be delivered over whole Plan period, in line with NPPF paragraph 23. It is important given 55% of BBC's employment land allocation in Plan is proposed at BEP. Site still has uncertainty over access and how and when will be delivered. Furthermore, BBC's evidence base (Economic Futures 2013-2033 Report 2018) indicates there is need for site to be delivered early in Plan period, in order to accommodate local businesses that may be affected by employment land re-allocation proposed in Plan.</p> <p><i>Clarity is sought on the deliverability and phasing of employment land allocations in order to meet requirements outlined in the Local Plan.</i></p>	Subject to agreement on vehicular access via the B186 (Warley Street) and engaged with Essex County Council as highways authority to reduce the speed limit of the road, the Council anticipates delivery of new employment land at Brentwood Enterprise Park could see first occupation within the first five years post Local Plan adoption. The site promoter has provided evidence of delivery as part of representations to the Plan and remains engaged regarding the delivery of infrastructure to facilitate development, as presented in the IDP.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.208</b>				
22502 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Criterion D. b. of Policy E11 refers to potential access points via M25 Junction 29 and Warley Street (B186) and associated slip roads. Currently unclear how access to site can be achieved directly from J29 of M25 as consequence of Lower Thames Crossing improvements to this junction, which includes segregated left turn slip road from A127 to M25 southbound. BBC therefore need to demonstrate that can achieve suitable access arrangements for all modes of travel, including appropriate mitigation/improvements. BBC should also demonstrate what discussions have taken place with Highways England, ECC as Highway Authority, and site promoter to ensure that access arrangements are deliverable and agreed.</p> <p><i>Paragraph 9.208 needs to be amended to demonstrate the latest position in respect of access to the site, and what discussions have taken place with Highways England, ECC, and the site promoter to ensure that access arrangements are deliverable and agreed.</i></p>	<p>The Council has been engaged with Essex County Council as highways authority regarding the potential to access Brentwood Enterprise Park from the B186 (Warley Street). This would resolve the closure of the existing access at M25 junction 29 as a result of Lower Thames Crossing and remove any concerns from Highways England regarding the access as part of the strategic highway network. In order to achieve a compliant access scheme according to highways safety requirements, a request has been made to Essex County Council to lower the speed limit on this section of the B186 south of the A127. This is in line with the South Brentwood Growth Corridor sustainable transport vision, which sets out a vision and principles for lowering speed limits in the area, among other things, as part of ensuring transport infrastructure contributes to improved place-making for existing and new communities. The landowner and promoter for Brentwood Enterprise Park is engaged with Essex County Council on the details of how this access could be provided subject to reduced speed limit. Subject to the outcome of this request and wider work to set out the masterplanning of Brentwood Enterprise Park, including access, the justification text could be amended to reflect the agreed requirements.</p>	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>9.209</b>				
22498 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Currently it is unclear how access to the site can be achieved directly from J29 of the M25 as a consequence of the Lower Thames Crossing improvements to this junction, which includes a segregated left turn slip road from the A127 to M25 southbound. BBC therefore need to demonstrate that suitable access arrangements for all modes of travel can be achieved, including appropriate mitigation/improvements. BBC should also demonstrate what discussions have taken place with Highways England, ECC as Highway Authority, and the site promoter to ensure that access arrangements are deliverable and agreed.</p> <p><i>BBC need to demonstrate that suitable access arrangements for all modes of travel can be achieved, including appropriate mitigation/improvements.</i></p>	<p>The Council has been engaged with Essex County Council as highways authority regarding the potential to access Brentwood Enterprise Park from the B186 (Warley Street). This would resolve the closure of the existing access at M25 junction 29 as a result of Lower Thames Crossing and remove any concerns from Highways England regarding the access as part of the strategic highway network. In order to achieve a compliant access scheme according to highways safety requirements, a request has been made to Essex County Council to lower the speed limit on this section of the B186 south of the A127. This is in line with the South Brentwood Growth Corridor sustainable transport vision, which sets out a vision and principles for lowering speed limits in the area, among other things, as part of ensuring transport infrastructure contributes to improved place-making for existing and new communities. The landowner and promoter for Brentwood Enterprise Park is engaged with Essex County Council on the details of how this access could be provided subject to reduced speed limit. Subject to the outcome of this request and wider work to set out the masterplanning of Brentwood Enterprise Park, including access, the justification text could be amended to reflect the agreed requirements.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Employment Allocations</i>				
23730 - Sphere 25 - Planning Consultancy (Mr Peter Jeffery) [8235]	Object	<p>The Plan is unsound because it does not identify the required quantum of employment land to deliver the economic and employment growth objectives of the plan. Inclusion of Land Lying to the South of Brook Street would resolve this as it would help to provide a high quality site in a strategic location to deliver a range and mix of jobs and inward investment during the Plan period to 2033. The plan allows for growth to meet employment targets but does not allocate land, which can generate significant growth and prosperity.</p> <p><i>Further employment land needs to be allocated within the plan. Please refer to the detailed submission made by Sphere 25 on behalf of Cambria Autos Plc, regarding the proposed allocation of the Land Lying South of Brook Street.</i></p>	<p>Noted. The Council's strategy for meeting employment needs looks to allocate land capable of providing new jobs in line with evidence set out in the Brentwood Economic Futures report and noting the changing economic landscape. The spatial strategy for growth reflects this along with housing requirements, balancing the sustainability objectives for the location of development along with impacts on Green Belt, landscape, and transport, among many other things. The land proposed for employment use to the south of Brook Street and adjacent to M25 junction 28 has not been deemed suitable for development through the Council's site assessment process as part of plan-making in Brentwood. This also reflects the late nature of the site coming forward in the plan-making process, and so can be considered through future site assessment and review of the Brentwood Local Plan.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>Childerditch Industrial Estate</i>				
22504 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	Request additional paragraph after paragraphs 9.214, 9.219, and 9.224 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.	Policy BE08 Sustainable Drainage will require appropriate consideration of SuDS to avoid any increase in flood risk for all development. However, given parts of the site are at potential risk of flooding according the Environment Agency, it is considered that additional justification text would be helpful to add as suggested.	Add the following paragraph after existing paragraph 9.214: "The proposed development area is at potential risk of flooding from surface water as shown on the Environment Agency surface water flooding maps. Any development within this area should be directed away from areas of existing flooding and, where possible, should 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 flood risk mitigation measures outlined in the Essex SuDS guide."
		<i>Insert following wording as additional paragraph after paragraphs 9.214, 9.219, and 9.224 - The proposed development area 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. It should however be ensured that any development within this area complies with flood risk mitigation measures outlined in the Essex SuDS guide.</i>		

## POLICY E12: CHILDERDITCH INDUSTRIAL ESTATE

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY E12: CHILDERDITCH INDUSTRIAL ESTATE</i></b>				
22503 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Criterion B. c. of Policy E12 makes reference to development having consideration of improvements to A127 junction. The detailed information for access to this site should be set out in the Policy, consistent with the other site allocation policies. This should be informed by the outputs of the transport modelling for the Local Plan, which is currently on-going.</p> <p><i>The detailed information for access to this site should be set out in the Policy, consistent with the other site allocation policies. This should be informed by the outputs of the transport modelling for the Local Plan, which is currently on-going.</i></p>	<p>The Council's South Brentwood Growth Corridor sustainable transport vision looks at innovative mitigations to reduce speed and improve traffic flows at the junction for Childerditch Industrial Estate. However, at present this is not a proposal of the highways authority Essex County Council. Therefore, the Local Plan Transport Assessment has considered access to the site as currently provided. The Transport Assessment concludes that no specific mitigation is required as a result of high level flows. However, through any future planning application the detailed issues relating to site access would need to be considered through an application transport assessment. The policy sets out the requirement for development to consider improvements to the junction, if required, to facilitate employment growth at the site, as justified in paragraph 9.212.</p>	No further action

## POLICY E12: CHILDERDITCH INDUSTRIAL ESTATE

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24364 - Childerditch Industrial Estate [8371]	Support	<p>Childerditch Industrial Estate: Policy E12 is supported. We consider that it is justified, effective, consistent with national policy and necessary for the reasons set out elsewhere in these representations. Policy E12 proposes to allocate land that has previously been promoted at the Range North (site 112D) and the land to the south (site 112E), in addition to the existing Childerditch Industrial Estate, to provide a total developable area of 20.64 hectares across the entire Estate. The release of these sites from the Green Belt is justified and will ensure that the Plan has been positively prepared. At present, Childerditch Industrial Estate offers some 35 units. As part of the work supporting these representations, CMP Architects have undertaken an analysis of the Estate to identify how the existing Park could be regenerated for existing occupiers, redeveloped in areas to maximise efficiency, and expanded for future employment growth demand. The proposed masterplan at Appendix 1 provided for indicative purposes to support these representations, demonstrates the deliverability of the site over a period of time. The proposed allocations will extend the size of the Estate and as a whole, it is considered that it has the potential to accommodate around 50 units following redevelopment. The development of The Range North (site 112D) as a first phase will assist with the provision of funding to begin the process of upgrading the existing units and infrastructure at the Estate, which will ultimately lead to the development of the southern extension. This infrastructure will include an improved primary route through the core of the site and a number of secondary routes stemming from this to provide access to the different areas of the site. . It is very much expected that development will commence on site within the first few years of the Plan period. . In respect of Part B, criterion b) of Policy E12, we support the principle of improving walking and cycling links within the land owned by our client, which extends to Little Warley Hall Lane. However, we object to Part B, criterion c) of Policy E12, as it is not considered to be necessary (refer to Appendix 2</p> <p><i>Part B, criterion b) should be removed from Policy E12.</i></p>	<p>The Council's South Brentwood Growth Corridor sustainable transport vision looks at innovative mitigations to reduce speed and improve traffic flows at the junction for Childerditch Industrial Estate. However, at present this is not a proposal of the highways authority Essex County Council. Therefore, the Local Plan Transport Assessment has considered access to the site as currently provided. The Transport Assessment concludes that no specific mitigation is required as a result of high level flows. However, through any future planning application the detailed issues relating to site access would need to be considered through an application transport assessment. The policy sets out the requirement for development to consider improvements to the junction, if required, to facilitate employment growth at the site, as justified in paragraph 9.212.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>Codham Hall Farm</i></b>				
22506 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	Request additional paragraph after paragraphs 9.214, 9.219, and 9.224 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.	Policy BE08 Sustainable Drainage will require appropriate consideration of SuDS to avoid any increase in flood risk for all development. However, given parts of the site are at potential risk of flooding according the Environment Agency, it is considered that additional justification text would be helpful to add as suggested.	Add the following paragraph after existing paragraph 9.219: "The proposed development area is at potential risk of flooding from surface water as shown on the Environment Agency surface water flooding maps. Any development within this area should be directed away from areas of existing flooding and, where possible, should 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 flood risk mitigation measures outlined in the Essex SuDS guide."
<i>Insert following wording as additional paragraph after paragraphs 9.214, 9.219, and 9.224 - The proposed development area 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. It should however be ensured that any development within this area complies with flood risk mitigation measures outlined in the Essex SuDS guide.</i>				
<b><i>POLICY E10: CODHAM HALL FARM</i></b>				
22580 - Essex Wildlife Trust (Dr Annie Gordon) [2414]	Object	Policy wording lacks a commitment to deliver biodiversity net gain. Policy wording is ambiguous and includes an unnecessary caveat; this creates a potential loophole that could allow developers to forego enhancements.  <i>Policy wording should be amended and the caveat "where appropriate" removed, as follows: b. protect and enhance the adjoining Local Wildlife Site (Codham Hall Wood) to deliver a measurable net gain in biodiversity;</i>	Noted. No changes proposed to policy but will update Policy NE01 Protecting and Enhancing the Natural Environment in line with the NPPF requirements for securing net gains for biodiversity.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22330 - Essex Bridleways Association (Mrs Sue Dobson) [3855]	Object	<p>Please see our representations against site allocation E11 as the comments here apply equally to this site. The existing bridleways in both of these sites are linked by the A127 bridge which needs to include some safety measures eg a traffic light system due to the number of HGV's using the bridge.</p> <p><i>Retain and enhance the existing bridleways on this site and improve the safety and traffic management on the A127 bridge to ensure users' safety.</i></p>	<p>Noted. Policies E10 Codham Hall Farm and E11 Brentwood Enterprise Park require that development proposals preserve and where appropriate enhance the public right of way through the sites. The Council will continue to engage with the bridleways Association regarding the nature of enhancements through as specific development proposals emerge</p>	No further action
23727 - S&J Padfield and Partners (SJP) [6122]	Support	<p>Potential Access and Impact of Lower Thames Crossing: It is important that the Codham Hall Farm allocation reflects the potential need for enhanced access to the Brentwood Enterprise Park (BEP). The plan in Appendix A shows the potential land required to support the BEP access solution, which could affect the land currently shown as white land under E10. It is considered that the employment land lost to support this access solution, if utilised, is sourced elsewhere on the site to ensure no overall loss.</p> <p><i>The whole land within Policy E10 should be shown as white (released from Green Belt), allowing the employment and ancillary uses to be located within the site as required without compromising the amount of employment floor space provided. Such flexibility in where the uses are provided will be justified and positively prepared.</i></p>	<p>Noted. The amendments to the proposals map that show the allocation of land at Codham Hall Farm and its proposed removal from Green Belt attempt to reflect the location of existing employment uses on site. Land outside of this and highlighted yellow or hatched, i.e. without existing employment uses, reflects the need to landscape this area and keep free from development, as reflected in policy wording (E10 A a. and b.). Given discussion with the landowner and promoter of Brentwood Enterprise Park regarding vehicular access, it is proposed that Policy E10 B a. is amended to allow for access from the B186 and potentially through Brentwood Enterprise Park should the existing access via M25 junction 29 be closed to facilitate highways mitigation at the junction, as set out in the Local Plan Transport Assessment.</p>	Amend E10 B a. as follows: "access via M25 Junction 29 and/or Warley Street (B186);"

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23728 - S&J Padfield and Partners (SJP) [6122]	Support	<p>Support site allocation but object to: Criteria b regarding the adjoining Local Wildlife Site Codham Hall Wood. The LWS is outside of the allocation area and our client's control. The policy should therefore not require enhancement and this part of the requirement should be removed. Criteria c regarding Public Right of Way: whilst the need to maintain public rights of way is recognised the current wording fails to provide for potential diversion if required. Criteria d regarding walking and cycling connections should be changed to state "potential to walking and cycling connections".</p> <p><i>Amend the development principle criteria as suggested.</i></p>	The policy requirement is to protect and where appropriate enhance the nearby Local Wildlife Site. It is considered appropriate that development proposals should at the very least protect this habitat designation and through engagement with relevant stakeholders at the planning application stage identify where that protection could enhance the site, if appropriate.	No further action
23722 - S&J Padfield and Partners (SJP) [6122]	Support	At 9.6 ha of employment land, the Codham Hall site is one of the largest employment sites and therefore provides a significant proportion of the employment land requirement; it is important that its development is supported and encouraged. Its allocation therefore assists in the Local Plan strategy relating to economic growth being positively prepared and justified.	Noted	No further action
23726 - S&J Padfield and Partners (SJP) [6122]	Support	Removal of Site from the Green Belt: The NPPF does not define what constitutes 'exceptional circumstances'. However, case law may assist BBC and the preparation of its Local Plan in this respect, in particular, the judgment in Calverton Parish Council v Nottingham City Council & Ors. [2015] EWHC 1078. It has been demonstrated that removal of the site from the Green Belt will not cause significant harm to the Green Belt as a whole. Exceptional circumstances in accordance with the NPPF and the Calverton judgment have been demonstrated to justify amending the Green Belt boundary to remove the site.	Noted	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23725 - S&J Padfield and Partners (SJP) [6122]	Support	<p>In the absence of Policies map and clarity within Policy E10, it is not clear whether the whole site is removed from the Green Belt. With the majority of the site already being utilised for employment purposes and the whole site not contributing to the Green Belt purposes, the whole site should be removed from Green Belt. Currently the whole site is not shown as white land and has green hatching. Policy should clarify that landscaping, amenity, access and ancillary uses are appropriate in this area.</p> <p><i>Allocation Boundary: Policy E10 should therefore be clear that the site as a whole is removed from the Green Belt. It would be clearer and more effective if the site as a whole was shown as white land to clarify that landscaping, amenity, access and ancillary uses are appropriate in this area. There is otherwise the risk that a planning application for such uses could be considered against Green Belt policies rather than as being in accordance with Policy E10.</i></p>	The Council is keen to ensure only required land to meet development needs is removed from the Green Belt. In this case, land currently used for employment purposes is proposed to be allocated by removal from Green Belt (Policy E10 A a.). Land not currently used for employment purposes is within the site area but not proposed to be removed from Green Belt (Policy E10 A b.). This is clarified in the proposed changes to Policies Maps.	No further action
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9.219				
23729 - S&J Padfield and Partners (SJP) [6122]	Object	<p>Paragraph 9.219 seeks the submission of a workplace travel plan to promote sustainable transport. In the case of site E10 this is regularisation of existing uses and that additional infrastructure improvements are unlikely to be justified. A Framework Travel Plan will consider the implications of increased growth at the site and opportunities for sustainable transport. There is currently no travel plan in place on the site for the existing employment uses, with the production of a travel plan for the whole site therefore being an improvement of the current situation and a benefit of allocating of the site.</p>	Noted. The policy requires for a travel plan to be provided triggered by any future planning application on the site for new development. Even if this is redevelopment of existing uses, the local planning authority and highways authority will need to be satisfied that travel considerations have been made and are satisfactory, including provision of sustainable movement principles.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>East Horndon Hall</i>				
22507 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	Request additional paragraph after paragraphs 9.214, 9.219, and 9.224 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.	Policy BE08 Sustainable Drainage will require appropriate consideration of SuDS to avoid any increase in flood risk for all development. However, given parts of the site are at potential risk of flooding according the Environment Agency, it is considered that additional justification text would be helpful to add as suggested.	Add the following paragraph after existing paragraph 9.224: "The proposed development area is at potential risk of flooding from surface water as shown on the Environment Agency surface water flooding maps. Any development within this area should be directed away from areas of existing flooding and, where possible, should 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 flood risk mitigation measures outlined in the Essex SuDS guide."
<i>Insert following wording as additional paragraph after paragraphs 9.214, 9.219, and 9.224 - The proposed development area 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. It should however be ensured that any development within this area complies with flood risk mitigation measures outlined in the Essex SuDS guide.</i>				
<i>POLICY E13: EAST HORNDON HALL</i>				
23621 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	That the developments at Dunton Hills and East Horndon would ruin the setting of All Saints' Church East Horndon, a Grade I listed building and would harm the setting of several Grade II listed buildings.	Policy E13 requires that development preserves the setting of nearby listed buildings at East Horndon Hall and All Saints Church. Through the detail of a planning application it is expected that development proposals consider this issue and satisfy the requirement. In addition, policies HP19 - HP23 set out expectations for the consideration of heritage assets for all development proposals.	No further action
<i>Remove Dunton Hills Garden Village and East Horndon Hall from plan</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23619 - Dunton Community Association (Mr Edward Cowen) [6185] 23620 - Dunton Community Association (Mr Edward Cowen) [6185] 23622 - Dunton Community Association (Mr Edward Cowen) [6185]	Object	That Dunton Hills Garden Village, together with Brentwood Enterprise Park and the East Horndon employment area, would further reduce the narrowest and most critical section of the Metropolitan Green Belt, would replace a strong Green Belt boundary with a weak one, will have an unacceptable impact on SSSI's and would promote the coalescence of Southend with London.	The Council's proposed spatial strategy is to focus on our transport corridors as sustainable places to grow. These corridors flow through urban areas and Green Belt. The Council is not able to fully meet the development needs of the borough without considering land currently within Green Belt. Green Belt evidence shows that this is not the narrowest section of Green Belt in the borough. Parcels of Green Belt have been tested according the purposes of Green Belt set out in the NPPF, there is no evidence locations for growth are considered the most critical areas of Green Belt. The Council does not believe that development locations result in or promote coalescence. The Sustainability Appraisal and Habitats Regulation Assessment for the Local Plan do not indicate unacceptable impacts on SSSIs as a result of proposals.	No further action
<i>Remove Dunton Hills Garden Village and East Horndon Hall from plan</i>				
22251 - Mr and Mrs Paul McEwen [4610]	Support	Extra employment sites are vital to the plan.	Existing wording for paragraph 9.229 is still considered appropriate to meet the aims of what is being described.	No further action
23868 - East Horndon Developments Ltd [8341]	Support	Support allocation of East Horndon Hall as employment allocation and release from the Green Belt. Site location at the junction of the A128 and A127 has been identified as a key gateway area. It is well related to public transport infrastructure and the primary road network. The allocation of site is in line with Policy PC01, PC02 and PC03. The Council's evidence base including the Sustainability Appraisal shows that this is a site that performs well.	Noted	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23845 - MM Properties Ltd [6076]	Support	<p>Strongly support site E13. Site makes a significant contribution to the provision of new employment floorspace in Brentwood, is deliverable and appropriate to be released from the Green Belt. However, the draft wording of Policy E13 is not clear which part of the site the 5.5ha of employment land relates and whether this comprises additional employment land or whether it should include existing business uses within the red line area, see attached. Moreover, the extent of the developable area and floorspace should include the existing garden centre and East Horndon Hall, previously developed sites, and the additional floorspace.</p> <p><i>The wording of the site allocation policy should therefore be amended as follows:</i>  <i>"5.5 ha of *additional* employment floorspace (principally use classes B1, B2, B8 and any associated employment generating sui generis uses). Any planning application shall include elements of landscaping to improve visual amenity".</i></p>	Noted	No further action
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<i>Land adjacent to A12 and Slip Road, Ingatestone</i>				
22508 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Request additional paragraph after paragraph 9.229 to ensure factual representation of the current position in respect of flooding, in line with paragraphs 155 and 156 of the NPPF.</p> <p><i>Insert following wording as additional paragraph after 9.229 - The site falls within the Mounthnessing 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.</i></p>	XXX	YYY

## POLICY E08: LAND ADJACENT TO A12 AND SLIP ROAD, INGATESTONE

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b><i>POLICY E08: LAND ADJACENT TO A12 AND SLIP ROAD, INGATESTONE</i></b>				
22510 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Criterion B. a. of Policy E08 states that vehicular access should be via Roman Way. ECC have previously advised that vehicular access via Roman Road may not be able to meet highway standards, and that BBC need to provide the evidence to demonstrate that safe and suitable access(es), for all highway users, including pedestrians and cyclists can be achieved. This will need to be undertaken in consultation with ECC as the Highway Authority, and Highways England who control the A12 and its slip roads.</p> <p><i>Replace criterion B. a. with the following wording - safe and suitable access(es) for all highway users, including pedestrians and cyclists to be achieved in consultation with, and subject to the satisfaction of the Highway Authority, and Highways England who control the A12 and its slip roads;</i></p>	Assessment of the site indicates that access via Roman Road would be the only suitable option, it is not proposed that access be provided via the A12 (including slip road). Through the decision-making process and any planning application it would be expected that this issue is resolved to the satisfaction of the highways authority, and Highways England if necessary. Policy E08 B b. sets out requirements for improved walking and cycling connections.	No further action
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<b><i>9.227</i></b>				
22511 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Paragraph 9.227 makes reference to the main vehicular access for the site to be from Roman Road. ECC have previously advised that vehicular access via Roman Road may not be able to meet highway standards, and that BBC need to provide the evidence to demonstrate that safe and suitable access(es), for all highway users, including pedestrians and cyclists can be achieved. This will need to be undertaken in consultation with ECC as the Highway Authority, and Highways England who control the A12 and its slip roads.</p> <p><i>Replace first sentence of paragraph 9.227 with the following wording - The development should achieve safe and suitable access(es), for all highway users, including pedestrians and cyclists. This will need to be undertaken in consultation with ECC as the Highway Authority, and Highways England who control the A12 and its slip roads.</i></p>	Assessment of the site indicates that access via Roman Road would be the only suitable option, it is not proposed that access be provided via the A12 (including slip road). Through the decision-making process and any planning application it would be expected that this issue is resolved to the satisfaction of the highways authority, and Highways England if necessary. Paragraph 9.228 sets out expectation sustainable forms of movement (i.e. walking and cycling).	No further action

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
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## Appendix 1: Local Development Plan Housing Trajectory

### Appendix 1: Local Development Plan Housing Trajectory

23787 - RS2 Properties Ltd [8339]	Object	Dunton Hills Garden Village is identified as being capable of delivering 2,700 dwellings during the plan period, with the site being capable of delivering 100 dwellings starting from 2022/23 (i.e. within 3 years), and then between 150 - 300 dwellings each year thereafter. This level of growth from such a strategic allocation does not appear realistic; it is unlikely that the Local Plan will be adopted until 2020 at the earliest.  <i>Review the deliver timescale</i>	The Council has projected a housing trajectory based upon engagement with relevant land promoters. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.	No further action
23671 - M Scott Properties Ltd [8054]	Object	There is a long process before development on larger sites can begin, which render their ability to come forward quickly uncertain; therefore, it is totally unrealistic to project that 100 homes will be completed at Dunton Hills Garden Village as early as 2022/23, or for strategic sites are expected to deliver 1,555 dwellings within 5yrs of adoption. It would not be justified to rely on these sites to meet short term housing delivery.  <i>Appendix 1 should be amended to reflect the evidence provided by available evidence on the delivery of major developments. Additional smaller sites capable of providing homes in the early years of the plan period also need to be allocated.</i>	The Council has projected a housing trajectory based upon engagement with relevant land promoters. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23657 - EA Strategic Land LLP [279]	Object	<p>Furthermore, the proposed stepped housing trajectory is unjustified and simply reinforces the affordability challenges in the borough which need to be urgently addressed. There are a range of delivery issues with the housing trajectory for the first five year of the plan period which further demonstrates that the Council need to allocate additional land in order to meet their housing requirements.</p> <p><i>Site West of Thorndon Avenue, West Horndon is fully in accordance with the spatial strategy focused on transit orientated growth and should be allocated. No significant constraints with developing an urban extension at West Horndon, in addition to Dunton Hills Garden Village was identified by the Sustainability Appraisal. If Brentwood is to attempt to meet the housing needs, this approach is required.</i></p>	The Council has projected a housing trajectory based upon engagement with relevant land promoters. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required. Land West of Thorndon Avenue, West Horndon has been tested as a reasonable alternative site through the Sustainability Appraisal.	No further action
24090 - Countryside Properties [250]	Object	<p>Site R16&amp;17 can be delivered earlier than the stated timescales in Appendix 1 of the PSLP. In order to make the housing trajectory sound, amendments to the trajectory must be made to reflect the earlier delivery of the site in the plan period.</p> <p><i>Amendments to the trajectory must be made to reflect the earlier delivery of site R16&amp;17 in the plan period.</i></p>	Noted. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.	No further action
23702 - BPM Investments Ltd [8338]	Object	<p>There is a long process before development on larger sites can begin, which render their ability to come forward quickly uncertain; therefore, it is totally unrealistic to project that 100 homes will be completed at Dunton Hills Garden Village as early as 2022/23, and for strategic sites are expected to deliver 1,555 dwellings within 5yrs of adoption. It would not be justified to rely on these sites to meet short term housing delivery.</p> <p><i>Appendix 1 should be amended to reflect the evidence provided by available evidence on the delivery of major developments. Additional smaller sites capable of providing homes in the early years of the plan period also need to be allocated.</i></p>	xxxx	yyy

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23693 - Catesby Estates Plc. [7463]	Object	<p>We would caution against some of the anticipated delivery in the housing trajectory, which is overly optimistic. There is a long process before development on larger sites can begin, it would not be justified to rely on these sites to meet short term housing delivery. The stepped trajectory with a high reliance on strategic sites has less flexibility compared with allocating further smaller sites in providing short term housing land supply.</p> <p><i>The Council should take the opportunity to allocate further smaller sites within the Local Plan, assisting in providing flexibility and improving housing delivery in the short term.</i></p>	<p>The Local Plan sets out a strategy to meet the borough's housing needs in full during the plan period, which requires an immediate uplift in delivery from historic levels and so a stepped trajectory is proposed in Policy SP02. A range of sites are proposed in order meet the targets of the stepped trajectory. The Council has projected a housing trajectory based upon engagement with relevant land promoters. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.</p>	No further action
24145 - Mr Mr J Nicholls and Mr A Biglin (Land owners) [8368]	Object	<p>The housing trajectory suggest that DHGV will deliver 750 dwellings by 2026. However, given the recent research, adopting the lag of seven years from a Plan adoption date by end of 2019 (which is highly ambitious) would mean there would be no deliveries on site until after 2026. Paragraph 9.33 states that of the 6,700 homes, 4,000 are to be delivered after 2033. However, this is caveated by the statement 'subject to further feasibility and assessment of impact', calling into doubt whether 4,000 can be delivered on site.</p> <p><i>The Plan places significant reliance on the timely delivery of Dunton Hills Garden Village. This is not a positive strategy for meeting housing need and does not provide the flexibility required to address changes in circumstances. The allocation should be complemented by the allocation of small sites, to improve deliverability.</i></p>	<p>The Council has projected a housing trajectory based upon engagement with relevant land promoters. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.</p>	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24089 - Countryside Properties [250] 24110 - Marden Homes Ltd [8363] 24168 - Turn2us [6753]	Object	<p>Concerned to note that Dunton Hills Garden Village is anticipated to deliver housing completions from 2022/23, falling within the first five years of the plan. DHGV is a proposed major strategic development, intended to provide a new settlement supported by a range of facilities and infrastructure, and delivery of which will require a long process, therefore should not be relied on for short term housing delivery. To ensure the Local Plan is sound, there is a need for smaller sites to be supported by policies which will allow their short term delivery.</p> <p><i>To ensure the Local Plan is sound, there is a need for smaller sites to be supported by policies which will allow their short term delivery.</i></p>	<p>The Local Plan sets out a strategy to meet the borough's housing needs in full during the plan period, which requires an immediate uplift in delivery from historic levels and so a stepped trajectory is proposed in Policy SP02. A range of sites are proposed in order meet the targets of the stepped trajectory. The Council has projected a housing trajectory based upon engagement with relevant land promoters. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.</p>	No further action
23171 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>Delivery of DHGV will commence in 2022/23 at a rate of 100 homes per annum, climbing to 300 homes per annum by 2026/27. This seems overly optimistic given that the allocation is currently within Green Belt, requires masterplanning and will need to go through a planning application and elements of the condition discharge process before development can commence. No evidence is provided as to how the housing trajectory has been developed. No evidence or any form of a development framework/ masterplan for DHGV explains how the proposed accelerated rate of delivery will be possible.</p> <p><i>Basildon Council therefore seeks for evidence to be provided demonstrating the realistic delivery trajectory for DHGV so that the potential short-medium term pressures on services and facilities in nearby settlements can be assessed, understood and planned for by service providers and neighbouring authorities. This will help ensure adequate mitigation provisions can be put in place to reduce any potential negative impacts on Basildon Borough residents living nearby. This will make the Plan justified and effective.</i></p>	<p>The Council has engaged with stakeholders, including adjoining authorities, regarding masterplanning Dunton Hills Garden Village. The Masterplan Framework has progressed and production of Detailed Design Guidance is underway, these inform both the allocation and planning application(s) for the delivery of the garden village. The Council has projected a housing trajectory based upon engagement with relevant land promoters. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24153 - Mr Mr J Nicholls and Mr A Biglin (Land owners) [8368]	Object	<p>Appendix 1 of the Plan sets out this housing trajectory, which demonstrates that no units will be delivered in 2019/2020 from the site allocations, and only 66 units are proposed to be delivered in 2020/2021, with 318 in 2021/2022 and 632 in 2023/2024. This does not comply with the requirements of the NPPF, which states in paragraph 23 that:</p> <p>'Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.'</p> <p><i>The Plan should be amended to allocate a number of additional smaller and medium sized sites, as required by paragraph 68 of the NPPF, which will ensure provision of a five year housing supply, to enable continued delivery of homes throughout the Plan period.</i></p>	<p>The Local Plan sets out a strategy to meet the borough's housing needs in full during the plan period, which requires an immediate uplift in delivery from historic levels and so a stepped trajectory is proposed in Policy SP02. A range of sites are proposed in order meet the targets of the stepped trajectory. The Council has projected a housing trajectory based upon engagement with relevant land promoters. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.</p>	No further action
23106 - Basildon Borough Council (Mr. Matthew Winslow) [369]	Object	<p>The housing target for Brentwood as approved in November 2018 is likely to be subject to a recalculation following Government's indication that it will make clear in national Planning Practice Guidance that the 2014-based CLG Household Projections should be used instead of the 2016-based ONS Household Projections; which identified an OAN for Brentwood is 452 homes per annum. This could cause the plan to be less effective and justified.</p> <p><i>1) The Local Plan must be adjusted to incorporate previously discounted development sites, particularly in the Central Brentwood Growth Corridor to restore the flexibility in site supply across a broader range of spatial locations, thereby improving the Plan's effectiveness and deliverability. 2) The methodology to the Local Plan's Housing Trajectory needs to be published and open for comment and challenge of its assumptions.</i></p>	<p>Noted. Chapter 4 (Managing Growth), subheading "Local Housing Need" (paragraphs 4.11 to 4.21) are proposed to be updated in line with the change to Planning Practice Guidance and use of the standard method to calculate housing need. As set out in these paragraphs, this change was foreseen at the drafting of the plan and a buffer applied accordingly. Therefore, it is considered that the overall housing need expressed in Policy SP02 Managing Growth does not require change.</p>	Amend Chapter 4 paragraphs 4.11 - 4.21 (Managing Housing Growth), to update context of calculating housing need according to the standard method as set out in Planning Practice Guidance.

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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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*Local Development Plan Housing Trajectory*

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24383 - Chelmsford Diocesan Board of Finance [2627]	Object	<p>The Council is required to demonstrate a five-year housing land supply at any point in the plan period. In terms of the five-year housing requirement, the NPPF (paragraph 73) confirms a 20% buffer should be applied to the initial calculation in the event the results of the Housing Delivery Test show that delivery has fallen below 85% of the requirement. The PPG confirms the requirement to apply such a buffer in such circumstances also applies where the Local Planning Authority are seeking to confirm their five-year housing land supply through a recently adopted Local Plan. The 2018 Housing Delivery Test measurement for Brentwood Borough shows that only 51% of the Borough's housing requirements were met over the last three years; well below the figure required to avoid a 20% buffer having to be applied. The Borough's most recent reported five-year housing land supply (Five Year Housing Land Supply Statement as at 31 March 2018 (November 2018) ('HLSS') is 4.1 years. However, this is predicated on a requirement which, when considered in relation to the latest guidance, understates need; and a supply which, again when considered in relation to latest guidance, overstates supply. As such, the actual housing land supply is considerably less. Looking at this in detail, the HLSS considers an annual need of 343 dwellings, resulting in a total requirement once the 20% has been applied of 2,058 dwellings. However, applying the latest guidance and the Standard Method, the Borough's housing requirement is 452 dwellings per annum. Applying the 20% buffer, this results in a five-year requirement of 2,712 dwellings. In terms of supply, the HLSS includes sites without detailed planning permission and without evidence such sites will be delivered within five years. As per the NPPF, such sites cannot be considerable deliverable for the purposes of the five-year housing land supply. Table 1 of the HLSS suggests that at least 1,042 dwellings in the reported supply; 2 Paragraph: 038 Reference ID: 3-038-20180913; 3 Paragraph: 037 Reference ID: 3-037-20180913; did not have planning permission. Once these are removed from the supply calculation, the five-year supply comprises 653 dwellings. It is unclear if and how many of the dwellings categorised as having extant planning permission are on major sites which</p>	<p>The Local Plan sets out a strategy to meet the borough's housing needs in full during the plan period, which requires an immediate uplift in delivery from historic levels and so a stepped trajectory is proposed in Policy SP02. A range of sites are proposed in order to meet the targets of the stepped trajectory. The Council has published a Housing Action Plan in line with requirements to consider the updated housing supply position along with new monitoring data. The Council has projected a housing trajectory based upon engagement with relevant land promoters. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>only benefit from outline permission. Such sites would also have to be discounted. As such, the figure of 653 dwellings may overstate housing supply. A five-year supply of 653 dwellings compared to a requirement of 2,712 represents a 1.2-year housing land supply. The acute housing land supply shortage underlines the importance of allocating sites through the Local Plan which can deliver early in the plan period, and the need to avoid over reliance on large strategic sites which inevitably take a considerable time to bring forward. The housing trajectory provided as Appendix 1 to the PSLP projects that it will enable completion of 2,305 dwellings between 2019/20 and 2023/24 (or, to be precise, it projects 2,305.1 dwellings). Having regard to the Standard Method and the need to apply a 20% buffer to the housing requirement, the total five-year requirement for the Borough is 2,712 dwellings. Therefore, even before critical review of the supply, the PSLP will not provide a five-year supply of housing.</p> <p><i>Additional smaller sites capable of providing homes in the early years of the plan period also need to be allocated in order to ensure the Local Plan is sound - i.e. land to the south of Lodge Close, Hutton.</i></p>		
23762 - Strutt & Parker LLP (Jen Carroll) [6751]	Object	<p>The results of the 2018 HDT confirmed that Brentwood have delivered 50% of the housing requirement over the last three years and this is below the threshold - 20% buffer. The Borough's most recent reported five-year housing land supply is 4.1 years. This is predicated on a requirement which, when considered in relation to the latest guidance, understates need and an overstated supply. A five-year supply of 653 dwellings compared to a requirement of 2,712 represents a 1.2-year housing land supply.</p> <p><i>This acute housing land supply shortage demonstrates the importance of allocating sites through the Local Plan which can delivery early in the plan period, and support the existing supply of housing.</i></p>	Noted	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24268 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Object	<p>A total of 7,752 dwellings be provided in the Borough between 2011-2033 with 310 homes per year to 2022/23 and then 584 per year from 2022/23 taking forward a "stepped delivery" approach to deal with a projected shortfall in the first 5 years of the PSLP. This is mainly because a greater proportion of homes to be delivered in the PSLP comprise sites located in the Green Belt, resulting in longer lead in times to delivery. Whilst we do not raise objections in principle to the stepped approach as far as our clients are concerned there is a prospect that some sites in the Green Belt have the prospect of coming forward earlier, particularly smaller and medium sized developments. This certainly includes this site R24, and R23 that is the subject of a separate representation. The stepped approach proposed, there are still issues with BBC's over-optimistic estimates and assumptions on the delivery of larger strategic sites proposed for allocation in the PSLP. Of the new allocations, 4,578 homes are made up of strategic allocations (of which 2,700 are at DHGV and are to be delivered in the Plan period) and 1,510 are other allocations. The strategic sites therefore represent 68% of the total number of new homes of which some 59% are allocated at DHGV. The ability of larger strategic sites to come forward quickly has been the subject of recent assessments in the Independent Review of Build Out, the Letwin Review (2018); and issues with their complexity, have been ably set out in the Lichfield's study From Start to Finish (2016). Both provide empirical evidence that the early delivery of such sites can be problematical due to a range of factors, including establishing required infrastructure requirements and the timing of housing delivery associated with those requirements, as well as the prolonged or protracted nature of the planning process. The Lichfield's report confirms that the planning process takes, on average, 2.5 years for the planning application determination period for up to 500 units; this can double for sites over 1,000 units. Two of the strategic sites within the PSLP's allocations also comprise developed sites currently in employment uses. The strategic sites are expected to deliver some 1555 homes within 5 years of an assumed adoption in 2020/21. Given the issues set out above it is considered that this is unrealistic and it</p>	<p>The Local Plan sets out a strategy to meet the borough's housing needs in full during the plan period, which requires an immediate uplift in delivery from historic levels and so a stepped trajectory is proposed in Policy SP02. A range of sites are proposed in order meet the targets of the stepped trajectory. The Council has projected a housing trajectory based upon engagement with relevant land promoters. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>would not be justified or the most appropriate strategy to rely on these sites for short term housing delivery. Therefore emphasises the need to review the ability of smaller or medium sized sites such as R23 and R24 to provide for greater flexibility and more homes which have a far greater prospect for short term delivery to ensure the Local Plan is sound.</p> <p><i>Need to review the ability of smaller or medium sized sites such as R23 and R24 to provide for greater flexibility and more homes which have a far greater prospect for short term delivery to ensure the Local Plan is sound.</i></p>		
24155 - Wiggins Gee Homes Ltd [2788]	Object	<p>Reliance and build rate of Dunton Hills Garden suburb is not realistic. This will squeeze delivery at Dunton Hills into an eight-year period with a resulting annual build rate requirement of nearly 340. The planning permission is likely to be slower than described, there are no documents of support from Basildon Council. The Emerging Basildon Local Plan shows no proposals relating to the Dunton Hills project on its side of the border. Instead it shows the whole area as Metropolitan Green Belt land. All the above indicates that there has been a lack of cross-border cooperation on the Dunton Hills proposed land allocation since 2016. The quantity and timing of new housing delivery from this site, set out in the Pre-Submission Document, are not soundly based. We believe the whole project is now mired in a controversy that involves two of the Borough's local authority neighbours. This must cast doubt on whether the Duty to Cooperate has been fully followed. Therefore at present the whole project is surely in jeopardy.</p> <p><i>The Pre-Submission Document relies very heavily on the Dunton Hills Strategic Allocation. If it were not accepted, or only partially accepted, a review of all the Plan's allocations would be needed and alternatives, like our client's site at Pilgrims Hatch, be reconsidered to make up the deficit.</i></p>	<p>Dunton Hills Garden village is planned as a self-contained community. Work with neighbouring authorities has informed the emerging Masterplan Framework and Detailed Design Guidance for the site. The Local Plan sets out a strategy to meet the borough's housing needs in full during the plan period, which requires an immediate uplift in delivery from historic levels and so a stepped trajectory is proposed in Policy SP02. A range of sites are proposed in order to meet the targets of the stepped trajectory. The Council has projected a housing trajectory based upon engagement with relevant land promoters. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24311 - Strutt & Parker LLP (Mr. Andy Butcher) [2741]	Object	<p>A total of 7,752 dwellings be provided in the Borough between 2011-2033 with 310 homes per year to 2022/23 and then 584 per year from 2022/23 taking forward a "stepped delivery" approach to deal with a projected shortfall in the first 5 years of the PSLP. This is mainly because a greater proportion of homes to be delivered in the PSLP comprise sites located in the Green Belt, resulting in longer lead in times to delivery. Whilst we do not raise objections in principle to the stepped approach as far as our clients are concerned there is a prospect that some sites in the Green Belt have the prospect of coming forward earlier, particularly smaller and medium sized developments. This certainly includes this site R24, and R23 that is the subject of a separate representation. The stepped approach proposed, there are still issues with BBC's over-optimistic estimates and assumptions on the delivery of larger strategic sites proposed for allocation in the PSLP. Of the new allocations, 4,578 homes are made up of strategic allocations (of which 2,700 are at DHGV and are to be delivered in the Plan period) and 1,510 are other allocations. The strategic sites therefore represent 68% of the total number of new homes of which some 59% are allocated at DHGV. The ability of larger strategic sites to come forward quickly has been the subject of recent assessments in the Independent Review of Build Out, the Letwin Review (2018); and issues with their complexity, have been ably set out in the Lichfield's study From Start to Finish (2016). Both provide empirical evidence that the early delivery of such sites can be problematical due to a range of factors, including establishing required infrastructure requirements and the timing of housing delivery associated with those requirements, as well as the prolonged or protracted nature of the planning process. The Lichfield's report confirms that the planning process takes, on average, 2.5 years for the planning application determination period for up to 500 units; this can double for sites over 1,000 units. Two of the strategic sites within the PSLP's allocations also comprise developed sites currently in employment uses. The strategic sites are expected to deliver some 1555 homes within 5 years of an assumed adoption in 2020/21. Given the issues set out above it is considered that this is unrealistic and it</p>	<p>The Local Plan sets out a strategy to meet the borough's housing needs in full during the plan period, which requires an immediate uplift in delivery from historic levels and so a stepped trajectory is proposed in Policy SP02. A range of sites are proposed in order meet the targets of the stepped trajectory. The Council has projected a housing trajectory based upon engagement with relevant land promoters. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.</p>	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
		<p>would not be justified or the most appropriate strategy to rely on these sites for short term housing delivery. Therefore emphasises the need to review the ability of smaller or medium sized sites such as R23 and R24 to provide for greater flexibility and more homes which have a far greater prospect for short term delivery to ensure the Local Plan is sound.</p> <p><i>Need to review the ability of smaller or medium sized sites such as R23 and R24 to provide for greater flexibility and more homes which have a far greater prospect for short term delivery to ensure the Local Plan is sound.</i></p>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24127 - Ford Motor Company (Mr Clive Page) [3769]	Object	<p>It is noted that the current PSD makes provision for 7,752 new residential dwellings (net) to be built in the Borough over the plan period 2016-2033 at an annual rate of 310 dwellings per year to 2022/23, followed by 584 dwellings per year from 2023/24-2033. This approach adopts a stepped trajectory; resulting in the backloading of housing delivery beyond 2023 which we understand is in part due to a high proportion of Draft designated GB edge of settlement sites not being available for development until later in the plan period. Whilst our Client supports BBC's ascertain to direct housing growth to allocated sites in highly accessible locations along the transit/growth corridor, our Client considers that the starting point for examination of the Plan should be that a straight, rather than stepped trajectory should be used - to avert a significant, historic under-delivery of housing to persist(acknowledging that BBC are continuing to under-supply against its housing requirement until at least 2022/3).</p> <p><i>In light of comments raised above (in addition to our Client's comments to Draft Policy RO4 and RO5), we contend that the housing trajectory referenced within Appendix 1 of the PSD should be reviewed and adjusted to recognise that the Ford Warley site (both the northern and southern parcel) can be delivered earlier in the plan period (1-5 years versus the 9-17 years as currently drafted), irrespective and in isolation of the Council Depot - which our Client has indeed raised in both previous rounds of consultation on the local plan (including the Call for Sites and PSA). Indeed, and as BBC officers are aware, Ford will be vacating the Warley Site in 2019, with Conceptual masterplanning already undertaken and submitted to BBC; demonstrating the deliverability and suitability of the Site for a significant quantum of residential development on the Site (please refer to 'Garden in the Woods' Conceptual Masterplan at Appendix A2; as submitted to BBC in May 2017 as part of the Call for Sites consultation).</i></p>	<p>The Local Plan sets out a strategy to meet the borough's housing needs in full during the plan period, which requires an immediate uplift in delivery from historic levels and so a stepped trajectory is proposed in Policy SP02. A range of sites are proposed in order meet the targets of the stepped trajectory. The Council has projected a housing trajectory based upon engagement with relevant land promoters. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23832 - Strutt & Parker LLP (Mr Alasdair Sherry) [6713]	Object	The Borough's most recent reported five-year housing land supply is 4.1. However, when considered in relation to the latest guidance, understates need; and a supply which is overstated. Having regard to the Standard Method and the need to apply a 20% buffer to the housing requirement, the total five-year requirement for the Borough is 2,712 dwellings. Even before critical review of the supply, the PSLP will not provide a five-year supply. We are concerned to note that Dunton Hills Garden Village is projected to delivery housing completions from 2022/23. begun. The ability of larger sites to come forward quickly is unlikely and problematic.	The Local Plan sets out a strategy to meet the borough's housing needs in full during the plan period, which requires an immediate uplift in delivery from historic levels and so a stepped trajectory is proposed in Policy SP02. A range of sites are proposed in order meet the targets of the stepped trajectory. The Council has projected a housing trajectory based upon engagement with relevant land promoters. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.	No further action
		<i>no specific change proposed</i>		
23808 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738]	Support	SUPPORT & COMMENT: the timing of the supply of houses accords with the proposed phasing and Hermes' management of the existing leases on the estate. Please note comments in relation to the numbers of new dwellings the site can accommodate.  <i>Proposing more dwellings on the West Horndon Industrial Estate.</i>	Noted	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<b>Appendix 2: Site Allocations</b>				
<i>Appendix 2: Site Allocations</i>				
26390 - Dr Eleanor Beddoe [8732] Object		<p>Site R25 in appendix 2 appears to be in direct contravention of the strategic development objectives in section 3. It is outside the strategic growth areas, in a category C village which does not possess the infrastructure required to support this number of new houses. It does not consider neighbouring developments by Epping council and the combined impact on the village. There is not demonstrable evidence that will consideration of alternatives including brownfield site has be considered.</p> <p><i>Revise site allocations to focus on urban extension to Brentwood or similar in identified growth areas. This would make the proposed development and associated plan more consistent and suitable when measured against its own objectives.</i></p>	<p>The housing needs of the borough have been evidenced and the Council is proposing a spatial strategy to meet that need, which includes some development in villages such as Blackmore in order to provide a flexible supply of locations for new development to meet needs, as required by the NPPF (see NPPF paragraph 68).</p>	No further action
22591 - Mr Sasha Millwood [4539] Object		<p>Resubmission of documents; sets out the response given to the site allocations in the consultation in 2018 (NB: reference numbers are different -- why did the Council change them all, I wonder?). The Council seems to have largely ignored my comments.</p> <p><i>Make the Green Belt an absolute priority. For the sites that remain after having discounted the Green Belt ones, impose a minimum density, requiring developers to opt for blocks of flats rather than houses. Where a developer wishes to build houses, they must be terraced, and a strong justification made for the lower density.</i></p>	<p>The density and type/size of properties has been considered in relation to the constraints of the sites and their location and identified housing need, amongst other issues. It would not be appropriate to develop only flatted accommodation as this would be contrary to this evidence.</p> <p>The original reference numbers were from the evidence base where more than 300 sites were listed, numbered and considered. The new reference umbers aims to provide a contiguous list for simple reference in the Reg 19 local plan.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
23736 - St Modwen Properties PLC [5124]	Support	<p>The reference in Appendix 2 to the Brentwood Enterprise Park Site's delivery forecasting being "Years 5-15" should be amended instead to state: "Years 1 - 15" in order to reflect the intentions of the landowners and St Modwen and in particular the potential for early delivery of a phase of development using the existing access arrangements.</p> <p><i>Changes to Plan:</i>  <i>The reference in Appendix 2 to the Brentwood Enterprise Park Site's delivery forecasting being "Years 5-15" should be amended instead to state: "Years 1 - 15".</i></p>	The Council has projected a development trajectory based upon engagement with relevant land promoters. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required	No further action
<i>Residential-led Site Allocations</i>				
25712 - Ms Norma Jennings [5444]	Object	<p>I believe that problems besetting the Clapgate scrapyard site include difficulties involving access. Yet to invest in providing this could help to solve the problems. Traffic from the large amount of houses destined for Pilgrims Hatch, with access to the Doddinghurst Road, will make the road even more congested at peak times and will result in "rat runs" along minor roads. Traffic from those houses on the William Hunter Way site will put an ENORMOUS amount of pressure on Brentwood's congested unofficial ring road, comprising Western Avenue and Western Road. The junction with the latter and Weald Road is totally inadequate with traffic lights so close to the mini roundabout there. To build these houses will deprive the town of valuable car parking space and dissuade outsiders from visiting Brentwood.</p> <p><i>No specific change proposed.</i></p>	The Council's Local Plan Transport Assessment includes growth proposed from all site allocations as well as background growth planned in surrounding areas. The methodology has been developed through engagement from highways authorities (Essex County Council and Highways England). The assessment sets out the approach to transport modelling, modelling results and junction capacity assessments. It highlights the junctions that may require mitigation, sustainable measures proposed to support growth and the impact this has on junction assessments. The assessment prioritises the sustainable transport requirements of the Local Plan. This work has been undertaken in line with requirements. Mitigation is considered as part of the work and listed in the Council's Infrastructure Delivery Plan. Site accesses from Priests Lane will need to comply with highways authority standards, including safety.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22513 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Within the site allocation proformas there is an inconsistency in the format between the employment and residential allocations (employment years 1-5 etc, residential 2012/22 - 2022/23). It is recommended that one format is used.</p> <p><i>Amend format to ensure consistency.</i></p>	<p>Noted. The difference reflects the higher-level trajectory of employment land delivery. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.</p>	No further action
26396 - Mr Gareth Beedoe [8733]	Object	<p>Site R25 will have a detrimental impact on both the human and natural environment of the village. It fails to adhere to the strategic objectives of the plan. The village of Blackmore has a substantial heritage value to Essex and as such development should only be considered if no further option is available. Brentwood Borough Council have not demonstrated that there are not other brownfield sites in the key growth areas which should take priority over this proposed greenfield development. Equally, there has been no housing needs survey to demonstrate why Blackmore is even being considered in the local plan.</p> <p><i>Removal of development site R25 would move the local plan consistent with the strategy outlined within the document. By focusing on brownfield sites in the key growth areas, the borough council would be demonstrating for greater sensitivity to the heritage of the area and preserve an idyllic rural village location</i></p>	<p>Policy HP19 Conservation and Enhancement of Historic Environment requires that all development consider heritage assets, such as conservation areas and local character in the case of Blackmore village. The Council's proposed spatial strategy is to focus on our transport corridors as sustainable places to grow. These corridors flow through urban areas and Green Belt. The Council is not able to fully meet the development needs of the borough without considering land currently within Green Belt. Housing needs evidence for the borough has informed the levels of housing growth required.</p>	No further action
24058 - Mr Terry Haynes [8359] 24063 - Mr Terry Haynes [8359]	Object	<p>The forecasted delivery times for the proposed sites in the plan is ambitious. The level of growth for strategic sites such as Dunton Hills is not realistic and there is no evidence to support this. The plan is unlikely to be adopted until 2020 at the earliest and with the complexity of the applications for Dunton Hills, this will be delayed still further so the timetable there is unrealistic. Therefore more smaller sites are needed to be flexible to meet the 5 year land supply for housing. Land at rear of Mill House Farm is suitable and should be added. Evidence base should be revisited. Site is a suitable urban extension to Hook End, it would be well placed to assist in enhancing the villages. The Green Belt study confirms suitability of the site with moderate impact on the Green Belt. Other sites with similar impact are in the plan.</p> <p><i>Add Land at rear of Mill House Farm to plan</i></p>	<p>Land at rear of Mill House Farm has been assessed through the site assessment process and is not deemed suitable for development. The Local Plan sets out a strategy to meet the borough's housing needs in full during the plan period, which requires an immediate uplift in delivery from historic levels and so a stepped trajectory is proposed in Policy SP02. A range of sites are proposed in order meet the targets of the stepped trajectory. The Council has projected a housing trajectory based upon engagement with relevant land promoters. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
25801 - Mr Matthew Ionescu [8576]	Object	<p>Sawyers Hall Lane development would result in loss of greenery and increase in local pollution. Urbanisation in these areas could further effect the biodiversity and quality if further traffic is added.</p> <p><i>Has considered local opinion to an extent but requires further local consultation with residents.</i></p>	Noted. Land at Sawyers Hall Lane has been assessed through the site assessment process and is not deemed suitable for development.	No further action
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<i>R02 - Strategic Allocation - West Horndon Industrial Estate</i>				
23809 - Hermes Fund Managers Limited (Mr. Matthew Chillingworth) [3738]	Support	<p>Its unclear how BBC have worked out the gross and net figures as set out in the table. Its also the case that the Plan's gross to net calculations given for all the larger residential allocation sites varies, sometimes considerably. R02 site measures 17.6ha in total, which nets down to 15ha in the latest draft masterplan. The current layout is showing the number of dwellings to be nearer to 750, well over the figure of "around 580 new homes" set out in the policy. Its also noted that the density of development is lower in the Hermes' latest masterplan (50dph) than that suggested by LP (56.7dph), although this depends on the chosen base.</p> <p><i>Clarification suggested</i></p>	The 580 dwellings on site represents what is considered a reasonable estimate of the likely yield of the site based on average densities. Policy would not preclude a development coming forward that is higher or lower than the dwelling numbers indicated provided it is in conformity with policies in the Plan.	No further action
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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*R03 - Strategic Housing Allocation - Land north of Shenfield*



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24172 - Redrow Homes (Jenny Massingham) [7948]	Object	<p>he site is allocated for development and signposted in Policy SP02: Managing Growth. The site is currently in the Green Belt and the allocation anticipates the development of around 825 homes and associated infrastructure and facilities. The land to the east of the Chelmsford Road is in two ownerships, and both land promoters have agreed the principles of an overall master plan with Brentwood Borough Council. The Draft Local Plan anticipates that the homes will be delivered between 2023/24 and 2030/31; Redrow Homes is intending to see its portion of the new housing completed prior to this period, enabling it to contribute to the 5-Year Housing Land Supply. Redrow Homes, concerned to see its part of the Draft Plan implemented as quickly as possible, which requires the Draft Plan to be adopted equally soon, has considered the case made in the Draft Plan for the release of land from the Green Belt.</p> <p><i>Redrow Homes propose: 1- A new policy to follow on from Policy SP02, in Chapter 4 (Managing Growth): Alteration of Green Belt Boundaries The areas of land covered by the following policies are removed from the Green Belt: R03, (and all others concerned) The Council has arrived at these alterations on the basis of a sequential examination of brownfield and other sites not in the Green Belt, of a review of densities of development and of discussions with neighbouring local authorities to test the scope for them meeting some of the need for housing arising in Brentwood. The exceptional circumstances that justify the alterations are the severe shortage of land not within the Green Belt and suitable for development, making it impossible for the Council to meet its housing need other than through limited alterations of Green Belt boundaries. The Council has selected sites for boundary alterations where there will be least harm to the purposes of the Green Belt. 2- A new line to be added in the sequential test set out in para 3.23 Using Land Sequentially and the table revised to focus on land types: - Brownfield land within urban areas - Greenfield land within urban areas - Brownfield land within the Green Belt - Greenfield land within the Green Belt 3- Policy NE13 (Site Allocations in the Green Belt) is altered as follows: These sites are de-allocated from the Green Belt to allow development to take place...4- Para 8.117 is deleted.</i></p>	The Council has projected a housing trajectory based upon engagement with relevant land promoters. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
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*R04 - Ford Headquarters and Council Depot, Warley - Southern Site*

## Residential-led Site Allocations, R04 - Ford Headquarters and Council Depot, Warley - Southern Site

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24134 - Ford Motor Company (Mr Clive Page) [3769]	Object	<p>Ford notes that Draft Figure 7.6 and Appendix 2 of the PSD includes Part of allocation RO4 - 'Ford offices Eagle Way' (southern parcel of the Ford owned land) as an Existing Employment Site, whereby 2ha of land is proposed to be retained for employment purposes. However, there is no further evidence and/or explanation provided for this designation, which our Client indeed questioned and requested within our previous representations to the PSA consultation. With the new employment allocations alone, BBC appear to have more than supply of employment land to meet its overall forecast needs over the plan period - questioning the requirement to retain 2ha of employment floorspace at the Ford site (whereby there appears to be very limited, or indeed no market demand for such space with no real planning basis for the 2ha figure referenced). Accordingly, it is anticipated that the new supply through the 'Proposed Allocations' should sufficiently compensate for the full release of the Ford site for residential with the Draft allocation for the Site revised accordingly including the removal for the requirement for 2ha of employment land. It is also considered that the distance from Brentwood and Shenfield town centres and train stations would not be an attractive location for commercial investment - acknowledging that typically businesses requiring commercial properties of this size today, would pursue sites within close proximity of strategic infrastructure, trunk roads and more extensive local facilities and services. As such, and in light of current national policy parameters which specifically seek to promote sustainable forms of development, Ford wishes to object to the retention of employment uses at the Site - acknowledging that such a use is not considered an appropriate, or viable use of the Site in the future (contrary to the NPPF 2018).</p> <p><i>Client therefore respectfully requests that the Site is removed from the listed 'Existing Employment Allocations' under Draft Figure 7.6. We also note that no reference is made to the re-provision of the Council Depot which we understand is likely to be retained for employment purposes into the early years of the plan period (given its current operational status).</i></p>	<p>Noted. Policy R04 and R05 are linked and set out the provision of employment land will be considered on both or one of those sites. The Council (as landowner of R05) is in discussion with the landowner of R04 through a joined-up approach to development proposals to ensure the policy requirement is met.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>R05 - Ford Headquarters and Council Depot, Warley - Northern Site</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
24135 - Ford Motor Company (Mr Clive Page) [3769]	Object	<p>Ford notes that Draft Figure 7.6 and Appendix 2 of the PSD includes Part of allocation R04 - 'Ford offices Eagle Way' (southern parcel of the Ford owned land) as an Existing Employment Site, whereby 2ha of land is proposed to be retained for employment purposes. However, there is no further evidence and/or explanation provided for this designation, which our Client indeed questioned and requested within our previous representations to the PSA consultation. With the new employment allocations alone, BBC appear to have more than supply of employment land to meet its overall forecast needs over the plan period - questioning the requirement to retain 2ha of employment floorspace at the Ford site (whereby there appears to be very limited, or indeed no market demand for such space with no real planning basis for the 2ha figure referenced). Accordingly, it is anticipated that the new supply through the 'Proposed Allocations' should sufficiently compensate for the full release of the Ford site for residential with the Draft allocation for the Site revised accordingly including the removal for the requirement for 2ha of employment land. It is also considered that the distance from Brentwood and Shenfield town centres and train stations would not be an attractive location for commercial investment - acknowledging that typically businesses requiring commercial properties of this size today, would pursue sites within close proximity of strategic infrastructure, trunk roads and more extensive local facilities and services. As such, and in light of current national policy parameters which specifically seek to promote sustainable forms of development, Ford wishes to object to the retention of employment uses at the Site - acknowledging that such a use is not considered an appropriate, or viable use of the Site in the future (contrary to the NPPF 2018).</p> <p><i>Client therefore respectfully requests that the Site is removed from the listed 'Existing Employment Allocations' under Draft Figure 7.6. We also note that no reference is made to the re-provision of the Council Depot which we understand is likely to be retained for employment purposes into the early years of the plan period (given its current operational status).</i></p>	<p>Noted. Policy R04 and R05 are linked and set out the provision of employment land will be considered on both or one of those sites. The Council (as landowner of R05) is in discussion with the landowner of R04 through a joined-up approach to development proposals to ensure the policy requirement is met.</p>	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>R12 - Land at Hunter House, Brentwood</i>				
22598 - Cllr Philip Mynott [8283]	Object	Site R12 should never have been retained in the final version of the plan. [Should take design led approach to density and retain office space].	The spatial strategy provides for sites to come forward in sustainable locations, such as town centres, to maximise land in order to meet local development needs. This is particularly important as the Council is not able to meet full development needs without considering Green Belt release, and so the sequential approach to site selection suggests that redevelopment opportunities should be maximised. The site has been promoted by the landowner for residential development and is seemed to be in a suitable location. Whilst its current use is an office, it is not allocated within the 2005 Replacement Local Plan for employment purposes, instead being within the Brentwood urban area.	No further action
<i>Remove site R12</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>R13 - Chatham Way car park, Brentwood</i>				
22293 - Daniel Lucas [6973]	Object	<p>In a nutshell the policy is not treating it's community/residents and potential new residents/business owners fairly. It is not a true representation of each sites outcome it is just a site allocation.</p> <p>1. The local plan needs to consider its adjoining residents by confirming that it will only impact an entrance and exit via Chatham Way. As it stands it does not detail the environmental impact and access points that could later become part of the plan and it is this that makes a non compliant true representation.</p> <p>2. Transparency upon the sites use needs to be indicated and with it such environmental concerns factored, non compliance to full visibility is the problem.</p> <p>3. Address parking visitor spaces, business spaces, resident spaces and there number allocation.</p> <p>4. Drainage resolution indicated, facts to be provided and a resolution sort first and foremost.</p> <p>5. Estimated heights, sizes provides greater transparency accuracy.</p>	<p>The spatial strategy provides for sites to come forward in sustainable locations, such as town centres, to maximise land in order to meet local development needs. This is particularly important as the Council is not able to meet full development needs without considering Green Belt release, and so the sequential approach to site selection suggests that redevelopment opportunities should be maximised. The Council, as landowner, and as an authority considering the role of the town centre in terms of economic growth, is committed to retaining sufficient car parking levels through the consideration of future needs and a changing market (retail needs, visitor experience, technology changes etc). The Council has published the Brentwood Town Centre Design Guide SPD to inform the need for quality buildings and spaces - this includes consideration of building massing and heights etc.</p>	No further action



<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>R14 - William Hunter Way car park, Brentwood</i>				
22208 - Mr Matthew Vice [8213]	Object	<p>In summary, there is an extensive list of fundamental design issues with the current proposals which WILL have a negative impact on not only my property but the borough as a whole. Its clear that the Council have a brief to provide a certain number of residential units and they are looking to provide them without considering the blatantly obvious implications. Simply postponing these issues to the next stage is not acceptable as they need to be resolved prior to any further progress.</p> <p>1. The car parking provision needs to be resolved and the only way for this to be achieved is a below ground basement to house the car parking. The existing car park is full on most days and if the number of spaces is reduced this will have a detrimental effect on the town center.</p> <p>2. The number of residential units is not appropriate given the already congested nature of the town center. The development should be dominated by commercial units to improve the high streets retail offering. This needs to include a cinema and restaurants to attract visitors from outside the town.</p> <p>3. The height of the buildings should be reduced to lessen the impact on daylight for the existing buildings.</p>	<p>The spatial strategy provides for sites to come forward in sustainable locations, such as town centres, to maximise land in order to meet local development needs. This is particularly important as the Council is not able to meet full development needs without considering Green Belt release, and so the sequential approach to site selection suggests that redevelopment opportunities should be maximised. The Council, as landowner, and as an authority considering the role of the town centre in terms of economic growth, is committed to retaining sufficient car parking levels through the consideration of future needs and a changing market (retail needs, visitor experience, technology changes etc). The Council has published the Brentwood Town Centre Design Guide SPD to inform the need for quality buildings and spaces - this includes consideration of building massing and heights etc.</p>	No further action

Representations	Nature	Summary of Main Issue/Change to Plan	Council's Assessment	Action
22593 - Mr Sasha Millwood [4539]	Support	The density of this site could be made much higher, given the town centre location. Blocks of flats would be preferable to houses.	Noted. The spatial strategy provides for sites to come forward in sustainable locations, such as town centres, to maximise land in order to meet local development needs. This is particularly important as the Council is not able to meet full development needs without considering Green Belt release, and so the sequential approach to site selection suggests that redevelopment opportunities should be maximised. At the same time, a balance is required between maximising density and maintaining local character. The Local Plan attempts to strike that balance.	No further action
		<i>Increase density on this site with flats. .</i>		
<hr/>				
<i>R21 - Land south of Ingatestone</i>				
22176 - Mrs Lisa Bryanton [5596]	Object	<p>Our home is on this land you have squared off so does that mean our house is going? The rain water goes into a stream on our land, once concrete is down then this will have to take the excess of water and our garden will be flooded.</p> <p><i>Our house is not showing on the land which is worrying and we need to know we are not going to be put in hardship by our garden flooding as well as issues with our home insurance. The field flood all the time and Redrow have been provided with evidence of this. We would ask building work is comply complete on the land that was built on with the Nursery and the land not built on the leads to the railway line is left as it always has been.</i></p>	The boundaries indicate the broad site area to be allocated in line with removing the site area from the Green Belt and according to existing Green Belt boundaries. As landowner you are under no obligation to sell or redevelop the land. The Council is aware of discussion with the site promoter on land adjoining (Policy R21), and the issues that should be resolved through development provided continued communication is maintained. The Council is committed to assisting in this process if required.	No further action

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
22181 - mr James Kemble [8176]	Object	<p>Site R21 includes the Council Recycling/Waste facility south of the former Garden Centre. The Recycling/Waste facility should be retained in its present location on the edge of the village but away from residences. The proposal to build houses on the field currently used as a gravel depository south of the Recycling / Waste Centre ignores the dangerous access to the A12 which would be created.</p> <p><i>Delete Site R21 (former Garden Centre, Recycling/Waste Centre and field south of Recycling/Waste Centre) from the list for building on.</i></p>	The Council is in discussion with Essex County Council about the future use and location of waste facilities. Policy R21 requires suitable access to be provided as will be expected through a planning application in consultation with the relevant highways authorities.	No further action
<i>R25 - Land north of Woollard Way, Blackmore</i>				
22211 - MR NEIL MILLER [8214]	Object	<p>I do not believe that the area has adequate infrastructure to support new housing. The is very little public transport serving this location.</p> <p><i>Improve public transport, Another doctors surgery in the locality</i></p>	Through gathering evidence in support of the Local Plan, the Council has not identified infrastructure issues that would prevent delivery of the number of homes proposed at site R25 (see Infrastructure Delivery Plan). The housing needs of the borough have been evidenced and the Council is proposing a spatial strategy to meet that need, which includes some development in villages such as Blackmore in order to provide a flexible supply of locations for new development to meet needs, as required by the NPPF (see NPPF paragraph 68)	No further action
22529 - Holmes & Hills LLP (Mr Michael Harman) [8074]	Object	<p>R25 is inherently unsuitable developments because of inadequate access</p> <p><i>Remove site R25 from plan</i></p>	The appropriateness of Red Rose Lane for vehicular access to the site is being discussed with the Highways Authority, Essex County Council. Further assessment suggests that a more appropriate vehicle access could be achieved via Nine Ashes Road. Policy R25 and justification text (para 9.199) to "The development will consider an appropriate main vehicular access via Redrose Lane or Nine Ashes Road".	No further action

## Residential-led Site Allocations, R26 - Land north of Orchard Piece, Blackmore

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>R26 - Land north of Orchard Piece, Blackmore</i>				
22530 - Holmes & Hills LLP (Mr Michael Harman) [8074]	Object	R26 inherently unsuitable developments because of inadequate access,	The appropriateness of Red Rose Lane for vehicular access to the site is being discussed with the Highways Authority, Essex County Council. Further assessment suggests that a more appropriate vehicle access could be achieved via Orchard Piece or Fingrith Hall Lane.	Amend Policy R26 B (a) to "vehicular access via Redrose Lane, Orchard Piece or Fingrith Hall Lane".
<i>Remove site R26 from plan</i>				
<i>Employment Site Allocations</i>				
22514 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	Within the site allocation proformas there is an inconsistency in the format between the employment and residential allocations (employment years 1-5 etc, residential 2012/22 - 2022/23). It is recommended that one format is used.	Noted. The difference reflects the higher-level trajectory of employment land delivery. The Council is committed to presenting justified and accurate evidence in support of the trajectory and will continue to engage with site promoters and relevant stakeholders to ensure this is provided through the Examination in Public as required.	No further action
<i>Amend format to ensure consistency.</i>				

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>E11 - Brentwood Enterprise Park</i>				
22515 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	Access is stated as being M25 Junction 29 and/or Warley street (B186). Currently unclear how access to site can be achieved directly from J29 of M25 as consequence of Lower Thames Crossing improvements to this junction, which includes segregated left turn slip road from the A127 to M25 southbound. BBC therefore need to demonstrate that suitable access arrangements for all modes of travel can be achieved, including appropriate mitigation/improvements. BBC should also demonstrate what discussions have taken place with Highways England, ECC as Highway Authority, and the site promoter to ensure that access arrangements are deliverable and agreed.	The Council has been engaged with Essex County Council as highways authority regarding the potential to access Brentwood Enterprise Park from the B186 (Warley Street). This would resolve the closure of the existing access at M25 junction 29 as a result of Lower Thames Crossing and remove any concerns from Highways England regarding the access as part of the strategic highway network. In order to achieve a compliant access scheme according to highways safety requirements, a request has been made to Essex County Council to lower the speed limit on this section of the B186 south of the A127. This is in line with the South Brentwood Growth Corridor sustainable transport vision, which sets out a vision and principles for lowering speed limits in the area, among other things, as part of ensuring transport infrastructure contributes to improved place-making for existing and new communities. The landowner and promoter for Brentwood Enterprise Park is engaged with Essex County Council on the details of how this access could be provided subject to reduced speed limit. The Council will continue to engage with partners regarding infrastructure delivery and resolve specific issues through statements of common ground.	No further action
		<i>BBC need to demonstrate that suitable access arrangements for all modes of travel can be achieved, including appropriate mitigation/improvements. BBC should also demonstrate what discussions have taken place with Highways England, ECC as Highway Authority, and the site promoter to ensure that access arrangements are deliverable and agreed.</i>		

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>E13 - East Horndon Hall</i>				
22708 - Mr Colin Foan [2992]	Object	<p>I strongly object to the site south of East Horndon Hall being re-designated from Greenbelt to an Employment site (Policy E13) with the proposed intensification of building an industrial estate on the site. The evidence - namely Greenbelt change of designation, flood risk, and transport and infrastructure - as presented does not justify the change and a series of possible alternatives have not been examined in this consultation or the preceding Regulation 18 consultation.</p> <p><i>I recommend that the proposed E13 part of the plan is removed and if necessary the requirement for employment land is fulfilled by using space at other nearby sites.</i></p>	<p>The Council's proposed spatial strategy is to focus on our transport corridors as sustainable places to grow. These corridors flow through urban areas and Green Belt. The Council is not able to fully meet the development needs of the borough without considering land currently within Green Belt. Through gathering evidence in support of the Local Plan, the Council has not identified infrastructure issues that would prevent delivery of this number of homes (see Infrastructure Delivery Plan). Policy BE08 Sustainable Drainage will require appropriate consideration of SuDS to avoid any increase in flood risk for all development. However, given parts of the site are at potential risk of flooding according to the Environment Agency, it is considered that additional justification text would be helpful to add.</p>	<p>Add the following paragraph after existing paragraph 9.224: "The proposed development area is at potential risk of flooding from surface water as shown on the Environment Agency surface water flooding maps. Any development within this area should be directed away from areas of existing flooding and, where possible, should 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 flood risk mitigation measures outlined in the Essex SuDS guide."</p>

<i>Representations</i>	<i>Nature</i>	<i>Summary of Main Issue/Change to Plan</i>	<i>Council's Assessment</i>	<i>Action</i>
<i>E08 - Land Adjacent to A12 and Slip Road, Ingatestone</i>				
24102 - Freeths LLP (Mr Paul Brailsford) [5642]	Object	<p>Although broad support is given for the flexible approach of the required employment size, this flexibility should be reflected in the stated "Development Principles" that underpin the Policy as per the November 2018 draft rather than relegated to the reasoned justification. The National Planning Practice Guidance is explicit that "the local plan should make it clear what is intended to happen over the life of the plan, where and when this will occur and how it will be delivered". As drafted Policy E08 is not sufficiently clear and the support for flexibility in terms of accessible uses should therefore be reinstated under the Development Principles part of the Policy.</p> <p><i>Suggest redrafting the text to stated "other uses outside of Class B that enable job opportunities, taking account of market needs." The requested changes are wholly consistent with the statement at paragraph 9.226 that the "primary purpose of the policy is to deliver jobs for the local area" and should therefore be acceptable.</i></p>	The Council considers that the supporting text clearly sets out the intention for the site to deliver employment land that provides for job opportunities.	No further action
24103 - Freeths LLP (Mr Paul Brailsford) [5642]	Support	<p>Support removal from the Green Belt</p> <p><i>No change proposed.</i></p>	Noted	No further action

## ***Appendix 3: Monitoring Framework***

### ***Table 1: Monitoring Framework. Broad parameters for monitoring policy implementation***

22516 - Essex County Council (Mrs Anne Clitheroe) [6776]	Object	<p>Chapter 8 Natural Environment NE01. 3. Effective.</p> <p>Additional monitoring point required.</p> <p><i>Insert the following text after the third sentence - Increase in Positive Conservation Management of Local Sites (LoWS and LoGS) for reporting to Government SDL 160-00</i></p>	Noted. Changes proposed to Policy NE01 Protecting and Enhancing the Natural Environment in line with NPPF requirements for securing net gains for biodiversity (NPPF para 170 d and 174 b).	Amend Appendix 3 (Monitoring Framework), Chapter 8, NE01 Protecting and Enhancing the Natural Environment (Page 362), under "indicators" column after third indicator, Insert the following: "Increase in Positive Conservation Management of Local Sites (LoWS and LoGS) for reporting to Government SDL 160-00."
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**Representations****Nature Summary of Main Issue/Change to Plan****Council's Assessment****Action****Appendix 4: Proposed changes to the Brentwood Policies Map****Appendix 4: Proposed changes to the Brentwood Policies Map**

23731 - JTS Partnership LLP (Mr. James Govier) [2587]

The Appendix 4 of the pre-submission, Regulation 19 Document identifies that the production of a new Policies Map will require changes to the 2005 Proposals Map. Maps setting out the changes to the Plan were stated to be published as part of the Regulation 19 but this has not happened. As such, the plan preparation and consultation process has not adhered to requirements in failing to publish all relevant documents for consultation. The assessment of the site boundaries / inclusion of Protected Urban Open Space, particularly land at Playfield at Brentwood Ursuline is unknown and formal representation is not possible.

*Publication of the Policies Proposals Map to enable it to be consulted upon and to provide context to the references to it within the draft Submission Plan.*

Appendix 4 sets out areas of change on the Policies Map. No changes are proposed to the protected urban open spaces designation in the borough other than allocation of residential development at site R19 (Land at Priests Lane), which was published as a change. Land designated protected urban open space at Playfield (Brentwood Ursuline) is not proposed to be amended, therefore remaining as the same designation.

No further action

**Appendix 6: Glossary****Appendix 6: Glossary**

22264 - Essex County Council (Mrs Anne Clitheroe) [6776]

Object

The text accompanying 'Heritage Asset' relates to infrastructure not a Heritage Asset.

Noted and agreed.

Amend definition of heritage asset (page 378) as follows: "A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing)."

*Replace the existing text with the following -*

*A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).*