Section B: Your Representation

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

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

Full Name	Michael Calder

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

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

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

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

Schedule of Potential Main Modifications	MM no.	MM13
Sustainability Appraisal	para(s)	
Habitat Regulations Assessment	para(s)	
Policies Map or other supporting documents	Please specify	

Question 2: Do you consider this **Main Modification and/or supporting document:**				
Legally Compliant?	YES	☒	NO	☐
Sound?	YES	☒	NO	☐

Question 3: If you consider the **Main Modification and/or supporting document** unsound, please indicate which of the soundness test(s) does it fail (please mark all that apply):	
Not positively prepared	☐
Not justified	☐
Not effective	☐
Not consistent with national planning policy	☐

Question 4: Please provide details of either:

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

This submission has been prepared on behalf of Stonebond Properties (Chelmsford) Ltd (SPL) in response to the Council's current consultation on the Potential Main Modifications to the Brentwood Local Plan. The response concerns SPL interests as developer and promoter of part of the land forming Local Plan allocation R03 (Land North of Shenfield).

SPL continues to work collaboratively with Croudace Homes, Redrow Homes, and Countryside Properties, the joint promoters of R03, and this "Developer Group" have submitted a joint response, which this submission should be read alongside.

SPL is generally supportive of the Potential Main Modifications as the majority of proposed changes will make the Plan more effective and consistent with national policy. However, SPL does have specific comments regarding the following Potential Main Modifications, as follows:

MM13: Policy BE03 Carbon Reduction and Renewable Energy

SPL *supports* the modification to part B (renewable energy) which recognises that it will not be possible in all major development to provide 10% of the energy demands of the development from renewable energy, and that any shortfall against target can be met through S106 or CIL contributions or an off site provision.

This recognises that each site should be considered individually, and is responsive to potential changes during the life of the Local Plan, which will support delivery of development.

Please continue on a separate sheet if necessary

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

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

Please refer to Phase 2 Planning letter dated 9.11.21

Please continue on a separate sheet if necessary