

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

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

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

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

Schedule of Potential Main Modifications	MM no.	<input type="text" value="MM87"/>
Sustainability Appraisal	para(s)	<input type="text"/>
Habitat Regulations Assessment	para(s)	<input type="text"/>
Policies Map or other supporting documents	Please specify	<input type="text"/>

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

Legally Compliant?

YES

NO

Sound?

YES

NO

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

Not positively prepared

Not justified

Not effective

Not consistent with national planning policy

Question 4: Please provide details of either:

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

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:

**MM87: Policy R03 Land North of Shenfield**

SPL broadly *supports* the additional text (in bold) and its deletions. In particular the modifications provide further clarification regarding the requirements for the provision of a comprehensive masterplan in part 2 a. of the policy, which is welcomed and confirms that future planning applications should be accompanied by a comprehensive masterplan and phasing strategy. SPL is working collaboratively with the "Developer Group", with involvement from Brentwood Borough Council, to produce a masterplan for the site, which will accompany each respective developers planning applications and ensure a comprehensive development.

Notwithstanding, our broad support for the overall modifications to the policy, we remain of the view that some modifications require further refinement, such as follows:

1. Amount and Type of Development Part c

Part c, as modified states:

*'c. ~~provision for~~ 5% self-build and custom build housing across the entire allocation area;'*

However, for consistency between policies across the Local Plan, part c should reflect the requirements of policy HP01 (Housing Mix). This refinement will prevent any ambiguity during the determination of planning applications on land at Policy R03. This approach has already been reflected in Policy R01, which requires 'self-build and custom build plots in line accordance with Policy HP01'.

SPL is therefore seeking an amendment to Policy R03 part c to state as follows:

*'self-build and custom build plots in line accordance with Policy HP01'*

4. Infrastructure Contributions

The modifications would benefit from refinement to accord with policy MG05 (Developer Contributions) which relates requirements back to national policy and legal tests.

SPL is therefore seeking an amendment to Policy R03 part 4 to state as follows:

*'Applicants will also be required to make necessary financial contributions, **where such contributions are compliant with national policy and the legal tests.**'*

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

SPL is therefore seeking an amendment to Policy R03 part c to state as follows:

*'self-build and custom build plots in line accordance with Policy HP01'*

SPL is therefore seeking an amendment to Policy R03 part 4 to state as follows:

*'Applicants will also be required to make necessary financial contributions, **where such contributions are compliant with national policy and the legal tests.**'*

Please continue on a separate sheet if necessary