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Office:
Mobile:
Email:
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Main Modification Consultation 2021
Planning Policy Team
Brentwood Borough Council
Town Hall
Ingrave Rd
Brentwood
Essex, CM15 8AY

Dear Sir/Madam,

BRENTWOOD LOCAL PLAN: RESPONSE TO MAIN MODIFICATIONS

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.**'*

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.

MM15: Policy BE03 Establishing Low Carbon Renewable Infrastructure Network

SPL *objects* to modifications to part B of the policy which seeks to group sites together that are capable of delivering more than 500 units and requires them to include energy masterplans that incorporate a decentralised energy infrastructure.

SPL is concerned that these modifications proposed will have significant impacts on scheme viability and deliverability, which has not been considered within the Local Plan evidence base. A more flexible policy approach is required to ensure that these housing sites are delivered in accordance with the Council's housing trajectory.

Accordingly, SPL is seeking the inclusion of '*where possible*' at the beginning of Policy BE03 part B.

MM35: Policy HP01 Housing Mix

SPL *objects* to the revision of policy HP01 part C that would seek to reduce the threshold from 500 units to 100 or more dwellings where part a. and b. would apply. These modifications proposed will have significant impacts on scheme viability and deliverability on schemes of a 100 units or more, which does not have the same critical mass as a larger strategic scale 500 + unit schemes, to accommodate diversified housing types and models.

It is essential that clarification is given that this requirement relates to application sites delivering 100 or more homes.

SPL looks forward to discussing these matters further, and receiving the assurance requested, through the continued work on a comprehensive masterplan and the pre-application engagement for their proposals

Yours sincerely

Michael Calder BSc (Hons) DipTP MRTPI

Director