



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

September 2021

## REPRESENTATION FORM

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

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

Please note this form has two sections:

Section A – Personal information

Section B – Your representation

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

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

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

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

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

### Data Protection

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

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

**Guidance Note on Legal Compliance**

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

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

**Guidance Note on Soundness**

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

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

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

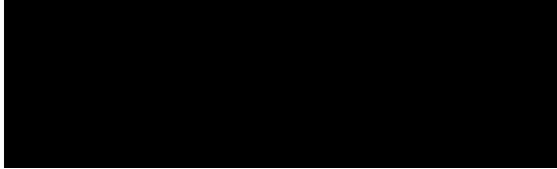
**Effective** - The Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

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

The preparation of the Local Plan has had regard to all policies in the NPPF. However, insofar as your comments relate to the Main Modifications, you may take the view that the Local Plan:

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

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

Section A: Personal Details	
Title	Mr
First Name	Mike
Last Name	Taylor
Job Title (if applicable)	Director
Organisation (if applicable)	Chilmark Consulting Ltd On behalf of: <b>U+I Group Plc</b>
Address	Cambridge House Henry Street Bath
Post Code	BA1 1BT
Telephone Number	
Email Address	

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

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

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

Full Name	U+I Group Plc
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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="4"/>
Sustainability Appraisal	para(s)	<input type="text"/>
Habitat Regulations Assessment	para(s)	<input type="text"/>
Policies Map or other supporting documents	Please specify	<input type="text"/>

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

Legally Compliant?

YES

NO

Sound?

YES

NO

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

Not positively prepared

Not justified

Not effective

Not consistent with national planning policy

Question 4: Please provide details of either:

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

Please see the attached representation submission

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 see the attached representation submission

Please continue on a separate sheet if necessary

## **Brentwood Local Plan Examination: Schedule of Potential Main Modifications**

### **MM4 – Strategic Policy MG01: Spatial Strategy**

**For and on behalf of: U+I Group Plc**

**November 2021**

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#### **Introduction**

1. This submission to the Brentwood Borough Local Plan Examination is for and on behalf of U+I Group Plc.
2. It is concerned with the Consultation on the Schedule of Potential Main Modifications (September 2021) and particularly with **MM4** (at page 12 of the Schedule of Potential Main Modifications) concerning the revision of Strategic Policy SP02 which is to be re-titled MG01: Spatial Strategy.
3. U+I Group Plc has acquired the land interest and position taken formerly by LaSalle Land Limited Partnership (LLLLP) with respect to the Brentwood Borough Local Plan (BBLP) submitted for Examination by Brentwood Borough Council (BBC).

#### **Overview**

4. Potential Main Modification **MM4** is concerned with revision to Policy SP02 (including re-titling the policy as MG01: Spatial Strategy).
5. U+I Group Plc object to the inclusion of the proposed stepped housing delivery trajectory in policy MG01 as set out at A(a.).
6. The stepped trajectory at MG01 A(a.) identifies an annual average rate of development of new housing at 300 dwellings per annum (dpa) to 2023/24, rising to 400 dpa to 2029/30 and then 984 dpa to 2032/33. The proposed stepped trajectory is also shown and described in **MM114 – Annexe 1** (see also U+I Group's separate response to that Potential Main Modification).



7. The stepped trajectory in the remaining 12 years of the plan period is unrealistic as U+I Group have previously identified. It would result in a significant residual risk in the last few years of the plan period (particularly 2030/31 – 2032/33) of under-delivery of housing for which there would be no planned remedy (further allocations or similar that could be drawn forward) and now a reliance on an early plan review.
8. The NPPF is clear that local authorities should significantly boost the supply of housing. Brentwood Borough is an area with a persistent record of under-delivery of housing over many years resulting in a significant shortfall to identified needs. The stepped trajectory approach supports a continued under-delivery in an area with an acute need for new housing now.
9. The South Essex Strategic Growth Locations Study (May 2020) (**F34A**) identified sustainable opportunities for housing growth including in and around Brentwood town as providing the opportunity for growth in the shorter term while other areas of South Essex progress their own plans.
10. There is therefore evidence available now that shows a more sustainable and appropriate direction for the Local Plan's spatial development strategy that could be brought forward to secure a meaningful five year housing land supply instead of relying upon an unrealistic stepped housing delivery trajectory as **MM4** proposes. This includes the allocation of additional residential and commercial development sites focused more on the main existing urban centres in the Plan's settlement hierarchy (especially Brentwood town and immediate surroundings).

## Remedy

11. U+I Group Plc has previously set out the necessary remedies for the Housing Trajectory. The Council should be directed to set out modifications that:
  - a. remove, or at the very least flatten, the extreme upward delivery rate curve of the stepped housing trajectory (as per the previous Main Modification proposed in **MM12** set out in **F9A** at page 10 which U+I Group supported);
  - b. take a much more positive and proactive approach to meeting, in full and with some significant contingency / headroom built in, the Borough's

housing requirement arising in the whole plan period, including in the next five years.

12. This should be achieved by allocation of more housing land and sites at sustainable, suitable and available locations including around Brentwood town that was highlighted in the South Essex Strategic Growth Locations Study (May 2020) (**F34A**). Such sites should include Land at Honeypot Lane, Brentwood –site ref: **022** (previously included as an allocation for residential development in the BBLP) and which the Plan's SA confirms as being a reasonable, sustainable and achievable location for housing.
13. The South Essex Strategic Growth Locations Study has emphasised (see section 8.3 at paragraph 8.3.4) the need for the Brentwood Local Plan (and Basildon's Plan) to be the vehicles for early years' housing land supply to assist in meeting more of the shorter term housing needs evident across South Essex while other South Essex authorities, whose plans are currently less advanced, have greater responsibility in meeting needs in later years.