

## 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	Steven Butler
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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="89"/>
Sustainability Appraisal	para(s)	<input type="text" value="-"/>
Habitat Regulations Assessment	para(s)	<input type="text" value="-"/>
Policies Map or other supporting documents	Please specify	<input type="text" value="MM117 (Appendix 3, monitoring Framework)"/>

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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.

We support the Main Modifications to policy R06 (Land off Nags Head Lane, Brentwood) set out under MM89. They clarify the policy expectations for the development of the site.

Within MM89, we note the stipulation at 3a of the policy, which requires “*off-site highways infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligations will determine the level and timing of payments for these purposes).*” Allied to this we note the Infrastructure Delivery Plan Part B Update (document reference F70) which specifies the requirements and the allocations to which they relate, including the policy R06 site. In this respect we support any relevant planning obligations associated with the development of the site where they meet the tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010, namely that they are:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development.

We also note the Appendix 1 Housing Trajectory (MM114) which identifies a delivery timetable between years 2022/3 and 2025/6 which we agree with.

However, MM117, Appendix 3 – Monitoring Framework, makes reference under the “housing delivery” indicator, to the delivery of 125 new dwellings, 35% affordable housing and 5% Self and Custom Build housing. We do not agree with the 5% Self and Custom Build element and believe it to be incorrect, because it is not referred to anywhere in the Pre-Submission version of the policy, or the schedule of Main Modifications at MM89, so there should be no reference to it here.

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.

The Appendix 3 Monitoring Framework (document MM117) should be amended so that reference to “5% Self and Custom Build” under the Housing Indicator column is removed.

Please continue on a separate sheet if necessary