

APPENDIX 1 TO ECC CMA – NOVEMBER 2019

ECC RESPONSE TO THE BRENTWOOD ADDENDUM OF FOCUSED CHANGES TO THE PRE-SUBMISSION LOCAL PLAN 2019, 26 NOVEMBER 2019

ECC Rep. No. & BBC Portal Rep. No.	Pre-Submission Local Plan Reference Section, Paragraph, Policy or Map	Is the Revised Publication Plan 1. Legally compliant Y/N 2. Complies with Duty to Cooperate Y/N 3. Sound Y/N	Reason 1. Positively prepared 2. Justified 3. Effective 4. Consistent with National Policy	Change needed to make the Revised Publication Plan sound / legally complaint	Participation at examination Y/N (if seeking modifications)
ECC 1 BBC 26727	<u>Focused Change 1</u> – Policy R01 (I): Dunton Hills Garden Village Strategic Allocation	3.N	<p>2. Justified 3. Effective 4. Consistent with National Policy</p> <p>Paragraph 31 of the NPPF requires planning policies to be underpinned by relevant and up to date evidence.</p> <p>BBC will need to be satisfied that the increase in dwelling numbers on this site is supported by the appropriate evidence base, including demonstrating that the reallocation of dwellings to this site is where the need is (paragraph 59 of the NPPF), and that all other reasonable options for reallocating the dwellings have been fully examined, including making as much use as possible of suitable brownfield sites and underutilised land, and optimising density (paragraph 137).</p> <p>BBC will need to be satisfied that the transport implications of the change in dwelling numbers on this site allocation are fully assessed through an updated transport evidence base for the Local Plan.</p>	<p>As a result of the increase in dwelling numbers for this site allocation BBC should include, within the Plan evidence and supporting text for this Policy, details to demonstrate that the reallocation of dwellings to this site is where the need is (paragraph 59 of the NPPF), and that all other reasonable options for reallocating the dwellings have been fully examined, including making as much use as possible of suitable brownfield sites and underutilised land, and optimising density.</p> <p>BBC should also update its transport evidence base for the Local Plan to fully assess the transport implications of the change in dwellings numbers on this site allocation.</p> <p>The policy needs to be further changed to address ECC's representations to this policy made to the Pre-Submission Regulation 19 Local Plan consultation in March 2019.</p>	Y

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			<p>The proposed change to this policy does not address ECC's representations to this policy made to the Pre-Submission Regulation 19 Local Plan consultation in March 2019.</p> <p>See</p> <p>ECC 67 / BBC 22434 ECC 68 / BBC 22435 ECC 69 / BBC 22436 ECC 70 / BBC 22437 ECC 71 / BBC 22438 ECC 72 / BBC 22439 ECC 73 / BBC 22440 ECC 74 / BBC 22441 ECC 75 / BBC 22442 ECC 76 / BBC 22443</p> <p>ECC's position has not changed on this matter.</p>		
ECC 2 BBC 26728	<u>Focused Change 2</u> – Policy R18: Land off Crescent Drive, Shenfield	3.N	<p>2. Justified 3. Effective 4. Consistent with National Policy</p> <p>Paragraph 31 of the NPPF requires planning policies to be underpinned by relevant and up to date evidence.</p>	As a result of the reduction in dwelling numbers for this site allocation BBC should include, within the Plan evidence and supporting text for this Policy, details to demonstrate that the site allocation makes effective and efficient use of land, and is economically viable.	Y

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			<p>BBC will need to be satisfied that the reduction in dwelling numbers on this site is supported by the appropriate evidence base, including demonstrating that the site allocation makes effective and efficient use of land (paragraphs 117, 118, 122 and 123 of the NPPF), and is economically viable (paragraph 67).</p> <p>BBC will need to be satisfied that the transport implications of the change in dwelling numbers on this site allocation are fully assessed through an updated transport evidence base for the Local Plan.</p> <p>The proposed change to this policy does not address ECC's representations to this policy made to the Pre-Submission Regulation 19 Local Plan consultation in March 2019. See ECC 82 / BBC 22450</p> <p>ECC's position has not changed on this matter.</p>	<p>BBC should also update its transport evidence base for the Local Plan to fully assess the transport implications of the change in dwellings numbers on this site allocation.</p> <p>The policy needs to be further changed to address ECC's representations to this policy made to the Pre-Submission Regulation 19 Local Plan consultation in March 2019.</p>	
ECC 3	<u>Focused Change 3</u> –	3.N	<p>2. Justified 3. Effective 4. Consistent with National Policy</p>	As a result of the reduction in dwelling numbers for this site allocation BBC should include, within the Plan evidence	Y

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BBC 26729	Policy R19: Land at Priests Lane, Shenfield		<p>Paragraph 31 of the NPPF requires planning policies to be underpinned by relevant and up to date evidence.</p> <p>BBC will need to be satisfied that the reduction in dwelling numbers on this site is supported by the appropriate evidence base, including demonstrating that the site allocation makes effective and efficient use of land (paragraphs 117, 118, 122 and 123 of the NPPF), and is economically viable (paragraph 67).</p> <p>BBC will need to be satisfied that the transport implications of the change in dwelling numbers on this site allocation are fully assessed through an updated transport evidence base for the Local Plan.</p> <p>The proposed change to this policy does not address ECC's representations to this policy made to the Pre-Submission Regulation 19 Local Plan consultation in March 2019. See ECC 93 / BBC 22474 ECC 94 / BBC 22476</p>	<p>and supporting text for this Policy, details to demonstrate that the site allocation makes effective and efficient use of land, and is economically viable.</p> <p>BBC should also update its transport evidence base for the Local Plan to fully assess the transport implications of the change in dwellings numbers on this site allocation.</p> <p>The policy needs to be further changed to address ECC's representations to this policy made to the Pre-Submission Regulation 19 Local Plan consultation in March 2019.</p>	

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			ECC 95 / BBC 22477 ECC's position has not changed on this matter.		
ECC 4 BBC 26730	<u>Focused Change 4</u> – Policy R25: Land North of Woollard Way, Blackmore	3.N	2. Justified 3. Effective 4. Consistent with National Policy Paragraph 31 of the NPPF requires planning policies to be underpinned by relevant and up to date evidence. BBC will need to be satisfied that the reduction in dwelling numbers on this site is supported by the appropriate evidence base, including demonstrating that the site allocation makes effective and efficient use of land (paragraphs 117, 118, 122 and 123 of the NPPF), and is economically viable (paragraph 67). BBC will need to be satisfied that the transport implications of the change in dwelling numbers on this site allocation are fully assessed through an updated transport evidence base for the Local Plan.	As a result of the reduction in dwelling numbers for this site allocation BBC should include, within the Plan evidence and supporting text for this Policy, details to demonstrate that the site allocation makes effective and efficient use of land, and is economically viable. BBC should also update its transport evidence base for the Local Plan to fully assess the transport implications of the change in dwellings numbers on this site allocation. The policy needs to be further changed to address ECC's representations to this policy made to the Pre-Submission Regulation 19 Local Plan consultation in March 2019.	Y

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			The proposed change to this policy does not address ECC's representations to this policy made to the Pre-Submission Regulation 19 Local Plan consultation in March 2019. See ECC 100 / BBC 22487 ECC 101 / BBC 22488 ECC 102 / BBC 22489 ECC's position has not changed on this matter.		
ECC 5 BBC 26731	<u>Focused Change 5</u> – Policy R26: Land North of Orchard Piece, Blackmore	3.N	2. Justified 3. Effective 4. Consistent with National Policy Paragraph 31 of the NPPF requires planning policies to be underpinned by relevant and up to date evidence. BBC will need to be satisfied that the reduction in dwelling numbers on this site is supported by the appropriate evidence base, including demonstrating that the site allocation makes effective and efficient use of land (paragraphs 117, 118, 122 and 123 of the NPPF), and is economically viable (paragraph 67).	As a result of the reduction in dwelling numbers for this site allocation BBC should include, within the Plan evidence and supporting text for this Policy, details to demonstrate that the site allocation makes effective and efficient use of land, and is economically viable. The policy needs to be further changed to address ECC's representations to this policy made to the Pre-Submission Regulation 19 Local Plan consultation in March 2019.	Y

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			<p>The proposed reduction in the dwelling numbers on this site has overcome the Highway Authority's previous objection to vehicular access, as raised in ECC's response to the Regulation 19 consultation in March 2019 (Reference ECC104 BBC22492 and ECC105 BBC22494). ECC are satisfied that vehicular access can now be taken from Redrose Lane as originally proposed, and is not required to be taken from Orchard Piece or Fingrith Hall Road as previously requested.</p> <p>The proposed change to this policy does not address ECC's other representation to this policy made to the Pre-Submission Regulation 19 Local Plan consultation in March 2019. See ECC 103 / BBC 22491 ECC's position has not changed on this matter.</p>		