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# Ingatestone and Fryerning Parish Council

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QUALITY  
PARISH  
COUNCIL

Planning Department  
Brentwood Borough Council  
Town Hall  
Ingrave Road  
Brentwood  
Essex  
CM15 8AY



—23 September 2013

Dear Sirs,

**Re: Draft Local Plan**

The Parish Council has studied this document at length and we offer the following comments. We note that in section 1.2 you state that the Borough will consider all comments received and may amend the plan in the light of these. The Parish Council believe that the comments it has made are valid and request that the Borough seriously considers amending the plan to accommodate our suggestions.

**Page 1 Para 1.6**

Add " including Village Design Statements." after the word produced.

The Ingatestone Village Design Statement contains details of the way its residents would like to see developments take place and is therefore relevant.

**Para 1.7**

This states that additional planning documents should only be used when justified. We believe that Village Design Statements and Conservation Area Appraisals are documents that should be used to inform the planning process and that the final Local Plan should reflect their use.

**Page 2 Sustainability Appraisal**

We are concerned that the Draft Local Plan was produced before the consultation on the Sustainability Appraisal (SA) had been carried out and that information in our response to this consultation may not have been taken into consideration. We have therefore enclosed a copy of this earlier SA response and ask you to ensure that the issues raised by us are considered in conjunction with this response.

**Page 5 Environment and Resources**

Section 1.30 refers to Conservation Areas and we seek assurance that Conservation Area Appraisal recommendations when accepted will be implemented and that the Local Plan will reflect the importance of this. The need for a robust procedure to be introduced for Locally Listing properties also needs to appear in the Local Plan to give greater protection to "at risk" buildings.

**Page 7 Para SO7**

We would like the words "from inappropriate development" to be inserted after "Safeguard the Green Belt". It is important to make it clear what the Plan seeks to safeguard.

**Para SO9**

You need to add a further sentence to read " Provide additional facilities in areas not well served"

OFFICE HOURS – TUESDAY AND THURSDAY  
9.30am – 12.30pm & 1.30pm – 3.00pm

*Cllr. Linda Boyce*  
CHAIRMAN

VAT Reg. № 103 5615 09

*Penny Fordham*  
CLERK TO THE COUNCIL

There is a need in Ingatestone to provide additional children play facilities.

**Page 8. S1 Spatial Strategy**

We welcome the statement that except for a few minor changes there will be no changes to Green Belt boundaries.

**Page 9 Option 2 Reason for objection**

You state that Ingatestone has been rejected because of infrastructure constraints but then go on to recommend the building of 130 houses on the Garden Centre. Although not in our parish we believe there is a need for you to reconsider this issue.

**Page 11 Para 2.7**

We would like you to consider changing the word "minimise" in the last line to read "avoid where possible". We believe that in view of the very strong feelings of borough residents on the question of the protection of the Green Belt that "avoid where possible" is more appropriate.

**Page 12 Para. 2.14**

Again in this section you make reference to the infrastructure constraints in Ingatestone and you talk about the modest level of development proposed. However, elsewhere in the Plan you recommend that 130 new homes should be built on our boundary. To us this is a total contradiction.

**Page 17 Land availability. Para 2.33**

Although the Parish Council was involved in the 2009 exercise the question of developing the Garden Centre was not put forward. When was its potential use considered and what reviews of its suitability have been carried out? We presume that for it to be included in the list of proposed sites the problems of sewage treatment have been overcome. Is this the position?

**Page 18. Para 2.36**

We welcome the fact that the Local Plan seeks to maximise affordable housing and this accords with the recommendations in the Village Design Statement and our views on the development of the Bell Mead site.

**Page 31 Managing growth. Section C**

Please note the reference to The Chelmsford Flood Alleviation Scheme in our response to the Sustainability Appraisal.

**Page 44. Policy CP9**

- We would like to the following sentence added at the end of this section. "It will introduce a procedure to enable buildings of historical and architectural interest to be Locally Listed". Please also see our comments on Policy DM20.

We believe that this is an important Core Policy and that there is an immediate need for a procedure to be introduced.

**Page 46 Policy CP10**

The first part of the first sentence of the policy should be changed to read "The current Green Belt boundaries across the Borough will be retained subject to etc. etc.".

We believe this is a more positive less woolly form of words than "general extent" and it still leaves open the opportunity to make minor changes.

**Page 47 Para 3.36**

We strongly believe that the first sentence should be rewritten to read "The new Local Plan provides an opportunity to consider Green Belt boundaries and allows only minor alterations to be made when justified."

We consider "refresh" does not imply that due consideration is given to any changes and no mention is made of the need to justify changes.

**Page 56**

Attractive shop fronts. We welcome the Plans' emphasis on attractive shop fronts. The control of this in conservation areas such as Ingatestone High Street is considered very important and should be particularly emphasised in the Plan.

**Page 69. Pre- application discussions**

These should include consideration of the requirements of Village Design Statements and Conservation Area status if appropriate.

**Page 97 Policy DM11**

We very much welcome the fact that extension of a domestic curtilage into the Green belt will not be permitted and that buildings in support of outside recreation will need to be justified.

**Page 101 Policy DM13**

The first sentence refers to very special circumstances but these are not defined. We believe that the sentence should read. "Proposals to extend dwellings within the Green Belt will not be permitted unless all the following criteria are met or very special circumstances are demonstrated".  
We think this is clearer and will avoid confusion.

**Page 101. Criteria B**

We are concerned that extensions of 30% to large properties could represent significant intrusion into the Green Belt and thereby affect its openness. Whilst we appreciate that criteria c. will give some protection we feel that some way of setting a maximum size should be seriously considered rather than a straight percentage figure which could give some properties too little and some far too much.

**Page 103 Policy DM14**

We support the need to replace a bungalow in the Green Belt with a bungalow as shown in Para. d. We would also like to see this principle extended to cover non GB locations such as in the residential envelope in Ingatestone. There is a shortage of bungalows in the central area of the village and consequently they are sought after and very expensive. The current Local Plan contains reference to this problem.

**Page 113/ 116 Policy DM18**

Within this policy we can see no reference to the Special Landscape Area of Highwood and Hanningfield within which Ingatestone sits. This attractive part of the Borough needs special protection and you must highlight its importance within the New Plan.

**Page 119/120 Policy DM20 Para. 4.77**

We welcome the intention of the Borough to compile a Local List of buildings but procedures for creating such a list should have been introduced many years ago. This council requested action on this matter as long ago as 2009 following recommendations by ECC contained in two Conservation Area Appraisals they carried out in Ingatestone. We have written on numerous occasions and nothing has happened. It is fair to say that one character property in Fryerning could probably have been saved from demolition if appropriate Local List provisions had been in place and a further property in the same area could well be next. The new Local Plan should say that the Borough WILL compile a list IMMEDIATELY. Your intentions to date have produced nothing and whilst this remains the position character properties throughout the Borough remain at risk.

**Page 131 Basis for site selection**

We note that sections 4.93, 4.94, 4.95, 4.96 and 4.97 lay out the criteria used when identifying both Bell Mead and The Garden Centre.

**Page 133 Policy DM24**

We note and agree with section a. which defines the number of affordable homes that will need to be built as part of the Bell Mead development.

**Page 154 Para. 4.139**

We welcome the fact that the provision of new childrens play spaces will be encouraged particularly within the residential area of Ingatestone.

**Page 165 Policy DM36**

No mention of the Chelmsford Flood Alleviation scheme appears in this policy.

The Parish Council has devoted a large amount of time reviewing the Draft Local Plan and we look forward in due course to the receipt of the definitive document. We trust that it will contain many of the suggestions we have put forward which we believe will improve it. Please feel free to contact us should require any further clarification.

Yours sincerely,



Penny Fordham  
Clerk to the Council

*Enclosed – Sustainability Proposal response*

*CC: Jennifer Candler, Roger Hirst, Ann Coe*