

From: Penny Fordham
Sent: 03 July 2013 14:48
To: Planning Policy
Subject: URS Sustainability (SA) of the Brentwood Local Plan – May 2013

Dear Sirs,

As requested at the Planning Meeting held on the 29th June 2013, please find below this Parish Council's response.

Page 40 Section 8.2.1 – The spatial extent of Fluvial flood risk.

The Parish Council would bring to your attention the letter already placed on file with the BBC in relation to the proposed Flood Alleviation Scheme which, in its opinion, would make the Fluvial flooding problem potentially an even greater risk. The letter states:

CHELMSFORD FLOOD ALLEVIATION SCHEME

APPLICATION No. 12/01320/FUL

REF: DC/CBC/M9XDXIBR0AS00

Ingatestone and Fryerning Parish Council OBJECTS to this application on the following grounds:-

General observations

The construction of a 500 metre long, 10 metre high embankment with roadways, lighting and service facilities in the Wid valley all represent inappropriate development in the Green Belt and Special Landscape Area. It is by definition harmful, and will have a detrimental effect on the existing landscape.

It should be possible to provide flood protection around properties already built, and we believe are continuing to be built, on flood plains in Chelmsford and therefore this Council believes that very special circumstances have not been demonstrated. So far we have seen no assessment which shows that this particular scheme would provide increased and substantial protection for low lying land in Chelmsford, and the effectiveness of the scheme seems doubtful. Alternative solutions to the flooding of properties built on flood plains in Chelmsford might be more effective. Light pollution and the free movement of wildlife along the valley is also a cause for concern. Unless carefully designed, lighting will certainly have an adverse effect on parts of the Wid Valley.

Effects on the Parish of Ingatestone & Fryerning.

When filled to capacity the resulting area of the increased flooding envelope upstream of the dam will threaten wildlife, trees, ancient woodland and the Grade 2 Listed bridge on the Ingatestone to Stock road which will be subjected to greater pressure from the increased depth of water. This road will inevitably remain closed for longer periods of time compared to that which occurs from the current natural flooding. The embankment may help to control river levels downstream but it will result in increased flooding upstream. The Parish Council is very concerned that currently there are no plans to provide embankment protection for the Ingatestone sewage works. Local knowledge suggests that even without the additional flood water caused by the embankment, recent natural floods have come very close to the boundary of this facility. We believe that, if this scheme proceeds, this decision should be revisited and that embankments to protect this site should be provided to ensure its safe operation at times of exceptional flooding. Increased upstream flooding will also add to problems regularly experienced at Buttsbury Ford which is dangerous even when small scale flooding of the Wid occurs. A scheme to bridge this Ford should form part of the total package which will improve better access to areas such as Billericay and Basildon from Ingatestone.

Yours sincerely

Page 43 – Green Belt land

Greenbelt is already defined as established some 60 years ago and in the current Local Plan.

Landscape Improvements

Despite the general attractiveness of the rural parts of the Borough there are also some areas of poor landscape quality. Reasons for this are varied, and include industrial activities, farming practices, loss of trees through development, Dutch Elm disease and other natural events, or simply neglect, in some cases because owners hope that unsightly parts of the Green Belt may then be released for development.

There is a world of difference to the preferred original text to that which is left. We would request a return to the original text as part of this consultation as It is essential that infrastructure implications are considered for any application i.e. building a Care Home in a village location would entail further demand on resources for example dentists, doctors, transport, care services, shops, without which such homes could become, inadvertently, prisons for residents with feelings of isolation and loneliness. Such infrastructure 'improvements' would be associated with that of a town environment. What about local importance? It's subjective as to what is a valued landscape. All greenbelt is valued landscape as previously established (**this is why we need to be protected by an up to date Local Plan**). **Recent examples within Ingatestone where applications for brownfield site Development that have been turned down by both the Parish Council and the BBC but have been passed on appeal are: 1) Ref: 12/00134/FUL and 2) Ref: 12/00670/FUL**

In addition home ownership is plummeting in the UK with the advent of the buy to let market, many of which are bought by foreign investors

- There were 29,000 buy to let mortgages in 1998. In Oct 2011 this had increased to 1.34million and rising.
- 50% of tenants in rented accommodation move on within 2 years. This does little for 'ownership' of a neighbourhood, community cohesion and does not 'Encourage the feeling of community spirit'.
- There is very little control/sanction against potential 'neighbours from hell' in private buy to let accommodation on short term tenancies.
- There is no guarantee that local development will be sold to local people...despite the sales pitch of a developer

Page 49 Section 9.3 – What are the likely issues that should be a focus of SA

We as a Parish Council believe that our village Design Statement completed in 2005 for the BBC Local Plan together with the Fryerning Conservation Area Appraisal carried out by the ECC on behalf of the BBC in 2011 form the 'core' principles under which any future decisions on development within the Ingatestone and Fryerning Villages must follow to maintain and enhance the status quo.

Page 52 Section 10.2.2 – Future Baseline Assuming Business as usual.

Without the implementation of the Plan it appears likely that the landscape of the Borough will come under greater pressure from inappropriate development resulting from a higher population and associated economic development, with negative effects on landscape character. Without a coordinated approach, development is more likely to occur in landscape areas which are regarded as having a high sensitivity to change and without suitable mitigation measures. **This is especially the case at the BBC who have no Local Plan in place to protect the local Parishes whilst the government strives ahead with their latest initiative to relax the Planning Rules over the course of the next 2 years to stimulate the economy through the creation of more developments and extensions. On this basis alone both**

the Village Design Statement and the Conservation Reviews, including Local Listings, should be adopted immediately and taken into account on every application for both Developments and Extensions to existing properties.

Page 54 Section 11.2.5

It is the Parish Council's opinion that in the absence of the Local Plan, it may be the case that development more often occurs on Greenfield land in the future. This is especially the case given the far greater availability of such land in the Borough and the likely growth in the local population and economy which will make such development lucrative. Such a move towards unconstrained development may also result in a decline in development densities. Development on Greenfield land will also potentially result in the loss of best, most versatile agricultural land. A final consideration relates to the Climate change projections for Essex, which suggest a decrease in soil moisture. **Again it is vital that the Village Design Statement, the Conservation Area Reports and local listings for Ingatestone and Fryerning are adopted by the BBC with immediate effect and are considered to be a material consideration in any development application to avoid this happening.**

Page 59 section 13.2.2 The Wastewater Treatment Works

The Wastewater Treatment Works (WwTWs) at Doddinghurst and Ingatestone are currently at capacity and unable to receive any additional flow (Figure 13.1). This lack of capacity may affect growth in Tipps Cross, **Ingatestone Fryerning** and Mountnessing Wards, plus the eastern half of Brizes and Doddinghurst Ward (including Kelvedon Hatch and Doddinghurst). **It is recommended that growth in these areas be avoided. The Parish Council is extremely concerned that in spite of this recommendation the BBC has just published in the Brentwood Gazette dated the 26th June 2013 146 proposed new homes in the Ingatestone/ Mountnessing area.**

Page 64 – The Suggested Scope of Site Options Assessment - Data Availability

Again the Parish Council is of the opinion that without a local Plan (BBC), Village Design Statement, Conservation Assessment and Local Listings documentation in place to form the fundamental basis on which decisions are taken, when a Developer applies to develop a particular site within the area, irreparable damage will be done to the history and character of the villages of Ingatestone and Fryerning.

Regards,

Penny

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