



Strategic Growth Options consultation

I refer to your consultation regarding Strategic Growth Options for housing and employment and in particular the sites you have identified along the A12 corridor. I note that the A12 corridor proposal is one of three development options, the other two being the north of the borough and the A127 corridor but my concern as an Ingatestone resident centres on how the A12 corridor proposals will specifically affect Ingatestone and Mountnessing.

I note that that the two A12 plans published for this consultation are caveated to make clear that they present options rather than proposals and also that the sites have been put to you via approaches made to the council rather than put forward by yourselves.

Nevertheless, irrespective of their origins, specific sites have been clearly identified on a map and are identifiable on the ground for anyone wishing to assess them further.

Because such detail is available, it follows that your staff must have carried out some form of evaluation of these sites. The council would surely not consult the public on options which were obviously incapable of implementation because of failings of planning policy or detail. Unacceptable or undevelopable sites must have been screened out first because you would be inviting a lot of criticism in including them.

On the assumption that all the sites for both housing and employment are developable choices it is a reasonable prospect that at some time in the future any one of these sites might come under pressure for development, whether they survive the current consultation or not.

I therefore have concerns about the wisdom of identifying sites in the way you have. Basically what you have done is to flag up to the development industry that here are a number of sites you have judged to be at a prospect for development in the Green Belt no matter what their local plan status.

As a result you have weakened the council's position against refusal of planning permission on any of the sites (whether adopted at this stage or not) because a speculative developer could make the point that the council offered these sites as physically developable options in a public consultation irrespective of caveats.

It would have been better to have consulted on the principle of exceptionally allowing limited infill in the Green Belt along the A12 corridor without identifying any sites but made subject to the caveat that to be approved, each proposal must comply with national and local planning policy regarding Green Belt, along with all other council planning criteria. In other

words you should consider an A12 corridor development planning brief which is very tight and limits the amount of development that can take place overall including matters like building height and density. Specific sites you've found or which have been put to you should be kept confidential unless already in the public domain. Subsequent planning applications could then be dealt with on merit without the danger of an applicant claiming that the site had already been identified as an option. Would you please consider whether this might still be an acceptable way forward.

Some of the sites look completely unacceptable so may I ask you directly. Did you include every site suggested to you, no matter where it came from or how fanciful. Did you screen them all for inclusion in the options and if so what criteria did you use?

In order to consider the overall impact of the proposed sites the residential and employment plans must be put together and viewed as one. This reveals an extensive strip of potential development between and alongside both villages.

It is not clear from the residential plan whether open land to the north side of the A12 encircled by the A1023 and the entrance slip onto the A12 by-pass is included or not. I assume however that this land is site 079B as sites 079 A and C are annotated on the south east side of the A12. Would you kindly confirm that I am referring to the correct parcel of land.

All the sites are within the Green Belt and in addition both Ingatestone and Mountnessing are contained within Special Landscape Areas designation which extends over open countryside in all directions. As all the sites are within areas of protection there are fundamental issues of policy and principle to be addressed before any site can be developed.

With regard to the Green Belt I'm not aware that its status with regard to new development has been affected by Government policy revisions in that very special circumstances still need to be demonstrated before unacceptable can take place. Development for housing and employment remain unacceptable in principle in the absence of very special circumstances.

I can see no evidence in your consultation of the very special circumstances needed to justify any of the site options individually, cumulatively or as part of a strategic assessment of the overall housing and employment needs of the Borough. The Borough needs more housing but I can find no evidence demonstrating that it is essential to develop small areas of Green Belt between two villages on the A12 corridor compared with the housing or employment that can be gained on previously developed land elsewhere in the Borough or on other major proposed housing sites including strategically released areas of Green Belt elsewhere. The A12 sites near Ingatestone and Mountnessing are small, piecemeal and will make limited contribution to meet overall need.

The Council's consultants (URS) evaluated earlier proposals but seemed to have looked at only two sites, the garden centre (130 dwellings) and the Mountnessing roundabout, 2.6ha for employment. URS found considerable negative landscape impact due to the need to develop sensitive sites in the Green Belt. This lends considerable weight to my point about very special circumstances needing to be clearly demonstrated as the Council's own consultants cannot produce justification for these two sites alone, let alone to reach the higher bar needed for the cumulative impact of additional sites.

One of the fundamental purposes of the Green Belt is to prevent the coalescence of settlements within it. Ingatestone and Mountnessing are indeed separated by a wide corridor of open rural land on either side of the A12. Consequently they are discrete settlements with their own rural character and setting in their own distinctive rural environments.

Mountnessing is the first village on the A12 in Essex to have a properly rural setting beyond the Brentwood/Shenfield conurbation and it is vital to keep the remaining open land to the east of Shenfield as protected as possible from development so as to maintain the rhythm of settlement to countryside which exists along the A12 corridor to the borough boundary to the east and beyond to Chelmsford.

The importance of the open land between Ingatestone and Mountnessing can be appreciated from the 3 main vehicular routes passing through it. These are :

- 1) From the old A12 (A1023) east of Mountnessing where the landscape opens up to fields on both sides of the road giving an open aspect at the entrance to Ingatestone between Roman Triangle and the A12 bridge.
- 2) On Roman Road leaving Ingatestone where the land opens out beyond the garden centre and tip to provide a wide area of open land defining the end of the Heybridge part of the village separating it from the eastern end of Mountnessing.
- 3) On the A12 itself which is straight and on a falling gradient passing through fields on both side of the road before passing under the old road (A1023).

The proposed housing site between Roman Road and the A12 (079A) would completely change the character of the gateway into Ingatestone from all three routes and consolidate development in the gap to Mountnessing. If the land surrounded by the slip road to the north of the A12 is included (079B ?) the effect would be the further reduction of separation. If the wide and unsightly Roman Triangle travellers site is taken into account there would be development over a substantial part of the way through apart from the remaining strip of land between the slip road and Roman triangle.

It is proposed to have an employment site option on land to the south side of the A12 where the London bound slip road from the A12 would define the southern boundary of a long triangle of developable land (079C). Coupled with the housing site opposite (079A) all vestige of soft open land forming the gateway into Ingatestone would be lost at this point and a new gateway of commercial character would be created with a wide hard urban edge to greet visitors arriving along the A1023 which is the primary vehicular route in from the west. This gives a very poor gateway into Ingatestone, an attractive village and conservation area. In addition the employment site 079C may well have vehicular access difficulties given that both the A12 and the slip road could not be conveniently used. The only realistic option for access would be from the A1023 opposite the Roman Road junction possibly requiring a roundabout at this point.

Leaving Ingatestone heading to the A12 westbound along Roman Road the built up area of Heybridge is to the left hand side with the garden centre and “tip” forming the end of the built up area . The garden centre site is intended as a housing option for 130 dwellings and an approach has already been made for this development. If developed a continuous façade of new housing is likely to be created fronting the slip road. I note the comment on the consultation plan that landscaping should be provided “to maintain a clear boundary

between Ingatestone village, the A12 and Mountnessing village". I find it difficult to see how landscaping could be provided in a way to achieve this objective when you have a new employment proposal for the large site immediately beyond the tip (site106) which is on open land, albeit used as an occasional open storage depot for A12 maintenance materials and vehicles. If site 106 is developed there would be a continuous ribbon of development on the south side of the slip road up to and beyond the point where it joins the A12 and which would actually adjoin the first parts of Mountnessing unacceptably closing the distinctive and essential open gap.

If site 106 is no longer needed for A12 maintenance purposes then it should be returned to open Green Belt uses as its current use is surely temporary and exceptionally justified only because of the specific needs of the A12.

The A12 itself passes at an angle between Ingatestone and Mountnessing dividing the original Roman road. There is a strong sense of space on either side of the A12 as it passes between the villages but the development of the sites would substantially reduce this, especially on the south side of the A12 where sites 079 A and C come close to the boundary with the A12 but also on the north side where site 079B would do the same.

There is a site described as land to the south of Fryering Lane (site152) which is next to the north west of Fryerning Lane bridge over the A12 on rising open Green Belt land. This site would be visible from a wide area if developed for housing and is clearly beyond the village perimeter as defined at this point by the A12. It might be argued by developers to be a wide infill site connecting with the long established housing further up Fryerning Lane but to the contrary this site provides the only separation between these houses and the rest of Ingatestone. It is a visually important piece of open farmland and developing it would introduce the impression of continuous development extending Ingatestone northwards to Fryerning.

This site would be another example of intrusive development to the north of the A12 in open land of landscape value, others being the housing estate currently being built next to Trueloves and site 079B. These sites if permitted for housing will erode the strength of your defence against further similar developments as more precedents are set. Not only should you not be putting such sites forward for housing in your consultation but there is a good case that the revised local plan should contain a policy stating the importance of keeping the land to the north and west of the A12 open and undeveloped.

The Parishes of Ingatestone and Mountnessing between them have 17 site options where housing is proposed. The remainder are employment including the large scrapyard site where either use are options.

Have you considered the effect of these sites on local services were they to be developed ? I appreciate that many of the sites may not get built just yet, but the largest sites (Bellmead, garden centre and scrapyard) are already in the planning system at some stage or another.

Are you aware how congested Ingatestone is ? The doctors surgery seems overloaded and I am sure they can provide figures to support this.

Car parking generally is a steadily worsening situation, particularly with commuter parking. The controls against on-street parking have simply forced commuters into residential side

roads and to the extremities of the village where they interfere with traffic flow. It can be a nightmare driving through the village centre at any time of day due to congestion and commuter parking now typically extends along the A1023 carriageway past Seymore field.

Has any thought been given to school capacity from pre-school provision upwards ?

Do you know how all other services will cope such as drainage, sewage etc etc ?

Your option 3 – development at settlements with rail stations- seems on the face of it a reasonably sustainable suggestion until you look at the constraints Ingatestone has with its support services and parking. I understand that later this year platforms at the station are to be widened. I cannot see how this might be done without reducing the size of the car park on either side. This is just another factor to be taken into account

Before allowing piecemeal housing and employment schemes which cumulatively add a lot of new people in the village have you looked at these issues, evaluated the impact new schemes will have in the village infrastructure and devised a formal policy to strengthen negotiations with developers so as to get them to provide proper contributions for vital improvements via the planning process. For example to the surgery or for traffic calming from one end of the village to the other.

Regarding the garden centre proposal the site is only partly built upon and it has extensive gardens separate from the developed portion. Were the garden centre to apply for planning permission to carry out development to enhance its current use there would be all sorts of tests with regard to impact of new buildings and extensions in the Green Belt. You would be considering issues regarding height of any new structures, proposed site coverage before and after, footprint comparisons and the extent and impact of new buildings intruding into open parts of the site.

You should be applying similar tests to a housing scheme and look at whether any such proposals would meet the same tests as would be applied had the garden centre put its own scheme for extensions or development forward. It is only the core area of buildings on the site which is previously developed, the gardens and car park are open and provide a setting but have never been built on other than minor small ancillary and temporary structures. The gardens have over time spread south eastwards and sporadically encroach onto the open land between the established site and the railway. Your small scale proposals plan implies the larger site up to the railway for development, presumably in its entirety and this is backed up by the number of dwellings proposed (130 dwellings) and its quoted size at 3.25ha. (the units aren't given in the schedule but I presume hectares). This would give a density of 40 dwellings per hectare and above your baseline density of 30 dph for development not in the green Belt. The Garden Centre is within the Green Belt so a lower figure should apply perhaps more in line with the national housing density average of 25dph or less.

Notwithstanding the above there are strong objections to any proposal on the garden centre site which materially extends the area covered by existing buildings. The large well landscaped setting and car park provide a wide open buffer between the buildings and the tip and to the railway in line with your comment on the options plan.

Have you considered the effect a widened A12 might have on all the option sites which are near to it? I believe the government are now looking at improved transport links in the Anglia

region and widening the A12 to 3 lanes is back on the table which will include the need to safeguard any widening lines.

I am not clear regarding the status of the three traveller sites you have identified in the schedule and whether they are included as options for housing development. I am concerned about the Roman Triangle site principally. As you know, Roman Triangle was an unauthorised site and has a complex history involving enforcement action and temporary permissions. Has it now been made lawful as a permanent site to help meet the borough's needs for traveller accommodation? Roman Triangle is a very untidy and intrusive site with a wide frontage to the A1023. Its appearance lends it a poor ramshackle character but developing it for housing (if this is proposed) would lead to a formal urbanisation to the site closing the gap to Ingatestone much more effectively than its current appearance. If the travellers ever moved away, its return to its former open use could be achieved from its current condition but obviously not if developed for permanent housing. If it were a housing site, then questions arise as to where the travellers would go and what replacement provision would then be required elsewhere in the borough.

I apologise for the length of this letter and I hope you will take my comments into account. I would like responses to any questions I have asked.

Finally, although I have appeared critical of some of your proposals, may I say that your consultation and the thought that has gone into it along with its presentation is excellent. It is of credit to your staff that such a comprehensive and well thought out body of work has been produced and in such a clear form. All this is done at a time of cutbacks which must put intolerable strain on your planning and related resources. As a concerned resident thank you and well done.

