



Ingatestone and Fryerning

Parish Council

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

12th February 2015

Dear Sirs

Re: Response on the Brentwood Borough Local Plan Consultation – January 2015

The Parish Council have already provided the Borough with a detailed response to the 2013 consultation on the Local Plan 2015-2030 preferred options. Our comments and suggestions for changes to this and the preferred options contained within it still apply. The preferred options in, or close to, our Parish in the 2013 consultation all appear in the list of suggested sites for this latest consultation and any concerns we had about their suitability still remain. These concerns should be taken as forming a part of our response to this new consultation for these areas, together with the additional comments covering the rest of the suggested sites that did not form part of the 2013 consultation. Our comments on these additional suggested areas are shown in detail below. We have enclosed a copy of our response to the 2013 consultation 23rd September 2013 for your information and for the avoidance of doubt (copy enclosed).

One of our major concerns is that the necessary infrastructure to support large numbers of additional properties in or close to our Parish just does not exist. The sewage treatment works is already at full capacity and services such as Doctors, School places and parking are all overloaded and would not be able to cope should large numbers of houses be built in our area. Due to the piecemeal nature of the 13 sites that have been identified within the Village Boundary the LDP does not take account of this method of development as individual developers would not be responsible for infrastructure improvements to cope with the additional housing. There must be a strategy in place to ensure that prior to any development taking place the infrastructure within the village must be improved to cope as it is already an issue with the development of True Loves and Bell Mead.

Of great concern is the potential erosion of the Green Belt and Special Landscape Area surrounding our parish that would result if many of these proposed sites were developed. Examples of the damaging effect on the landscape can already be seen as the inappropriate development in the Green Belt at Trueloves takes place. The Village Design Statement (VDS) created by the people of Ingatestone and Fryerning after detailed and exhaustive consultation with the residents, makes it very clear that the residents do not

support the erosion of the Green Belt and they strongly support the retention of the existing boundaries. The residents also believe that the visual breaks between Margaretting and Mountnessing should be maintained and that the existing Residential Envelope should not be extended so as to protect Ingatestone's village character (See pages 8 and 9 of the VDS). The Parish Council also supports these views and we wish to

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9.30am – 12.30pm & 1.30pm – 3.00pm

Cllr. Linda Boyce
CHAIRMAN

VAT Reg. № 103 5615 09

Mrs Abi Howe
CLERK TO THE COUNCIL

emphasise the importance of the quality of the landscape surrounding Ingatestone and Fryerning and point out the great importance of maintaining this considerable asset by careful allocation of developable land and maintaining a green separation between the villages.

With the above considerations in mind we have studied the list of suggested sites and offer the following views concerning them:-

- 1) **042 Land at Bell Mead.** We understand the land has been sold and plans are awaited from the developer. We trust that the proposals will be based on the ideas put forward at the 2 seminars we attended with BBC, our Ward Councillors and the developers with provision for 14 homes and 10 car parking spaces.
- 2) **064 Everglades Avenue Road.** Development has already started.
- 3) **078 Land at Parklands.** This is a perfect example of "blurring" of village boundaries. Any village needs green open spaces to define its beginning and end. Developing this site would be a perfect example of how to destroy Ingatestone's village character and its attractive rural approach from the South. This site is in the Green Belt and Special Landscape Area. Development here would therefore be deemed inappropriate, decrease the separation between the village and Margareting and increase urban sprawl. The site could accommodate a large number of properties increasing the demand on already stretched infrastructure and services. Its development would not be supported by the Parish Council.
- 4) **079A Land adjacent to by-pass (part bounded by Roman Road).** It is essential that a green space separation be maintained between Ingatestone and Mountnessing. Development on this site would therefore not be supported by the Parish Council and should be rejected.
- 5) **079B Land adjacent to by-pass (part bounded by Roman Road).** See comments for 079A.
- 6) **079C Land adjacent to by-pass (part bounded by Roman Road).** Proposal is to develop the land for commercial purposes. The Parish Council are not in a position to comment without further information.
- 7) **098 Ingleton House Stock Lane.** Ingleton House is the only sheltered housing in the Parish and whilst it may be in need of upgrading the PC strongly believes the site should continue to be used for this very important purpose. A number of our Councillors have been approached by residents there who are horrified at the thought that their homes might be demolished. The Parish Council would not support the loss of this essential facility in our village.
- 8) **106 Site adjacent to the Ingatestone Garden Centre.** Proposed as a new employment site in Mountnessing. Without details it is not possible to comment on the effect it might have on our parish. We would however recommend that if the Ingatestone Garden Centre development was to go ahead then this site should be considered for the re-location of the Amenity site currently located next to the garden centre as once this development has been completed who would wish to live next to a tip?
- 9) **128 Ingatestone Garden Centre.** The number of dwelling proposed for this site will put excessive pressure on Ingatestone's already overstretched public services. Additional school places, medical facilities, parking provision and drainage and sewage facilities would be required to cater for 400 or so additional residents. The Parish Council therefore object to this proposal.
- 10) **153 Land to the South of Fryerning Lane.** Development here would be a gross intrusion into the Green Belt in a prominent position opposite a busy Infants School. The development would be outside the residential envelope and blur the village boundary to the West. It would destroy attractive open Green Belt land, and cause even further traffic chaos directly opposite to a busy Infants School and would be vigorously contested by the Parish Council.
- 11) **225 The Nutshell Stock Lane.** This site is in the Green Belt and a government inspector has already refused permission for development here. The land is bounded by a traveller's site and a motor repair facility and is not considered suitable for further development.

- 12) **GT005 Poplars Farm.** This site sits right on the boundary between Ingatestone and Margaretting. Development would destroy the separation between the two parishes, and to avoid the creation of an urban sprawl. The site is in the Green belt and should therefore not be developed further.
- 13) **GT016 Willow Farm.** This site also sits in the Green Belt and only has temporary permission. The PC believes that permission to develop the site still further should not be given.

The Parish Council have spent a considerable amount of time studying these proposals and we trust that the points we have raised will be seriously considered before firm proposals on sites for development in our parish are put forward. If you require further clarification please let us know.

Kind regards



Abigail Howe
Parish Clerk and RFO
Ingatestone and Fryerning Parish Council

Enc: Draft Local Plan letter, 23rd September 2013
LDP location maps of proposed developments in Ingatestone



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—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"

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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

