



# Agenda

## Policy, Resources & Economic Development Committee

Wednesday, 13 July 2022 at 7.00 pm

Council Chamber, Town Hall, Ingrave Road, Brentwood CM15 8AY

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### Membership (Quorum – 3 )

Cllrs Hossack (Chair), Poppy (Vice-Chair), Kendall, Lewis, Mynott, Naylor, Mrs Pearson, Russell and White

### Substitute Members

Cllrs Aspinell, Fryd, Gelderbloem, McLaren and Parker

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### Agenda

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### Live broadcast

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Jonathan Stephenson  
Chief Executive

Town Hall  
Brentwood, Essex  
05.07.2022

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### Information for Members

#### Substitutes

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The names of substitutes shall be announced at the start of the meeting by the Chair and the substitution shall cease at the end of the meeting.

Where substitution is permitted, substitutes for quasi judicial/regulatory committees must be drawn from Members who have received training in quasi- judicial/regulatory decision making. If a casual vacancy occurs on a quasi judicial/regulatory committee it will not be filled until the nominated member has been trained.

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#### Rights to Attend and Speak

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Any Members may attend any Committee to which these procedure rules apply.

A Member who is not a member of the Committee may speak at the meeting. The Member may speak at the Chair's discretion, it being the expectation that a Member will be allowed to speak on a ward matter.

Members requiring further information, or with specific questions, are asked to raise these with the appropriate officer at least two working days before the meeting.

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#### Point of Order/ Personal explanation/ Point of Information

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##### Point of Order

A member may raise a point of order at any time. The Mayor will hear them immediately. A point of order may only relate to an alleged breach of these Procedure Rules or the law. The Member must indicate the rule or law and the way in which they consider it has been broken. The ruling of the Mayor on the point of order will be final.

##### Personal Explanation

A member may make a personal explanation at any time. A personal explanation must relate to some material part of an earlier speech by the member which may appear to have been misunderstood in the present debate, or outside of the meeting. The ruling of the Mayor on the admissibility of a personal explanation will be final.

##### Point of Information or clarification

A point of information or clarification must relate to the matter being debated. If a Member wishes to raise a point of information, he/she must first seek the permission of the Mayor. The Member must specify the nature of the information he/she wishes to provide and its importance to the current debate. If the Mayor gives his/her permission, the Member will give the additional information succinctly. Points of Information or clarification should be used in exceptional circumstances and should not be used to interrupt other speakers or to make a further speech when he/she has already spoken during the debate. The ruling of the Mayor on the admissibility of a point of information or clarification will be final.

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### Information for Members of the Public

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#### Access to Information and Meetings

You have the right to attend all meetings of the Council and Committees. You also have the right to see the agenda, which will be published no later than 5 working days before the meeting, and minutes once they are published.

Dates of the meetings are available at [www.brentwood.gov.uk](http://www.brentwood.gov.uk).

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#### Guidelines on filming, photography, recording and use of social media at council and committee meetings

The council welcomes the filming, photography, recording and use of social media at council and committee meetings as a means of reporting on its proceedings because it helps to make the council more transparent and accountable to its local communities.

Where members of the public use a laptop, tablet device, smart phone or similar devices to make recordings, these devices must be set to 'silent' mode to avoid interrupting proceedings of the council or committee.

If you wish to record the proceedings of a meeting and have any special requirements or are intending to bring in large equipment then please contact the Communications Team before the meeting.

The use of flash photography or additional lighting may be allowed provided it has been discussed prior to the meeting and agreement reached to ensure that it will not disrupt proceedings.

The Chair of the meeting may terminate or suspend filming, photography, recording and use of social media if any of

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these activities, in their opinion, are disrupting proceedings at the meeting.

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 **Private Session**

Occasionally meetings will need to discuss some of its business in private. This can only happen on a limited range of issues, which are set by law. When a Committee does so, you will be asked to leave the meeting.

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  **Access**

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 **Evacuation Procedures**

Evacuate the building using the nearest available exit and congregate at the assembly point in the Car Park.



## Minutes

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### Policy, Resources & Economic Development Committee Wednesday, 9th March, 2022

#### Attendance

Cllr Hossack (Chair)	Cllr Lewis
Cllr Parker (Vice-Chair)	Cllr Mynott
Cllr Barrett	Cllr Mrs Pearson
Cllr S Cloke	Cllr Wagland

#### Apologies

Cllr Poppy

#### Also Present

Cllr Bridge  
Cllr White  
Barnes

#### Officers Present

Phoebe Barnes	-	Corporate Manager - Finance
Phil Drane	-	Corporate Director (Planning and Economy)
Laurie Edmonds	-	Corporate Manager - Economic Development
Zoey Foakes	-	Governance & Member Support Officer
Steve Summers	-	Strategic Director (Deputy Chief Executive)
Jacqueline Van Mellaerts	-	Corporate Director (Finance & Resources)
Richard Wilson	-	Commercial Consultant

#### LIVE BROADCAST

[Live broadcast to start at 7pm and available for repeat viewing.](#)

#### 332. Apologies for absence

Apologies were received from Cllr Poppy.

### **333. Minutes of the previous meeting**

The minutes of the Policy, Resources and Economic Development meeting held on 2<sup>nd</sup> February 2022 were approved as a true record.

### **334. Year in Review Presentation**

A presentation was received by officers Phil Drane and Jacqueline Van Mellaerts highlighting all that had been achieved by this committee for the municipal year 2021-22.

The Chair and members applauded the work undertaken by the Council officers during this time.

### **335. Corporate Asset Strategy 2022-25**

The Council's Corporate Strategy 2020-25 was adopted in January 2020 and outlined the Council's key corporate priorities and objectives. The report sought approval to adopt a Corporate Asset Strategy 2022-2025, which would complement and underpin the Corporate Strategy across all priorities.

The Corporate Asset Strategy provided a vision for the Councils asset portfolio, our approach to classify our assets as well as set seven key priorities that will deliver aims and objectives for our asset base.

After a full discussion, Cllr Hossack **MOVED** and Cllr Parker **SECONDED** the recommendations in the report. A vote was taken and it was **RESOLVED**.

**Members are asked to:**

**R1. Adopt the Corporate Asset Strategy as set out in Appendix A.**

**R2. Approve that delegated authority be given to the Corporate Director of Finance & Resources, in consultation with the Chair of Policy, Resources and Economic Development Committee, to make minor artwork and formatting changes to the Corporate Asset Strategy in advance of publication.**

#### **Reasons for Recommendation**

The Corporate Asset Strategy 2022-2025 is critical to the delivery of the Corporate Strategy 2020-2025.

### **336. Click It Local Extension**

In the face of lockdowns and restricted access to retail businesses during COVID-19, the council has signed up to the Click It Local platform to help generate sales for local retail businesses. This is in line with 2021-22 key objectives to encourage people to do business in the borough as part of the wider corporate priority to grow the economy. Click It Local allows customers to purchase from multiple independent businesses in one place, make one

payment and have one consolidated delivery or collection. The platform is currently supporting 32 local independent businesses.

The contract with Click It Local ends in March 2022. This report provided an update on the impacts that the platform is having with regard to economic growth, as part of regular updates to the committee.

Members asked officers to provide a more detailed breakdown of local retail sector performance in advance of contract expiry, in order to inform further decisions about the longevity of the Click it Local platform in the borough.

After a full discussion, Cllr Hossack **MOVED** and Cllr Parker **SECONDED** the recommendations in the report. A vote was taken and it was **RESOLVED UNANIMOUSLY**.

**Members are asked to:**

**R1. Endorse extending the council's Click It Local contract by six months.**

#### **Reasons for Recommendation**

It is recommended that the Click It Local Brentwood contract be renewed for an additional six months. With the funding from Essex County Council, the extension is risk free. The council will continue to work with Click It Local to help them onboard more businesses, support existing participating shops and develop a higher customer profile in the community.

A six-month extension will bring the council's contract into line with Rochford District Council and the North Essex Economic Board, ensuring that our businesses are receiving the same support as neighbouring authorities. Updates on the performance of Click It Local in Brentwood will be brought to the committee in future to inform decisions about the contract beyond six months.

### **337. Community Infrastructure Levy**

The report updated members on the progress of preparing Community Infrastructure Levy (CIL) in the borough. It provided an overview of CIL and how Section 106 agreements can continue to be used alongside.

Before a CIL Charging Schedule can be adopted it must be subject to two rounds of consultation followed by an independent examination. The first stage of consultation, the Preliminary Draft Charging Schedule was undertaken in October 2016. The second stage is the publication of a final Draft Charging Schedule.

Following examination of the Brentwood Borough Local Plan 2016-2033, the Council is now in a position to progress work to finalise the Draft Charging Schedule for the second stage of consultation.

After a full discussion, Cllr Hossack **MOVED** and Cllr Parker **SECONDED** the recommendations in the report. A vote was taken and it was **RESOLVED UNANIMOUSLY**.

**Members are asked to:**

**R1. Approve that further work be undertaken to introduce the Brentwood Borough Community Infrastructure Levy (CIL) Charging Schedule, including updating viability evidence and the production of a final Draft Charging Schedule, to be brought to committee prior to examination submission.**

**R2. Approve that work begin to consider options for setting up a local panel that would decide on the priorities and spending of CIL and Section 106 monies, to be brought to committee in due course.**

**R3. Approve that options be considered and presented to a future committee for the creation of a CIL Officer role to lead on the administration and negotiation of development contributions.**

#### **Reasons for Recommendation**

Given the amount of CIL revenue potentially available through allocation sites in the new Brentwood local plan, and the long-term nature of the proposals in the White Paper, it is recommended that the Council progress with the production of a CIL Charging Schedule. This will enable the Council to obtain additional infrastructure funding while any future changes to the CIL process, and the wider planning system, are considered, agreed, and implemented accordingly.

The introduction of a CIL Charging Schedule will maximise the potential for new development to generate income for the delivery of new infrastructure, while also ensuring that proposed rates do not render new development in the borough financially unviable.

It will be important to identify how CIL funds are collected and monitored alongside S106 contributions. For this reason, options should be presented on how members and key partners can take part in decisions through a form of panel arrangement. In addition, administrative functions can be part funded by CIL and so options should be presented to a future committee on the potential for creating a new officer role to lead and monitor wider developer contributions

### **338. Urgent Business**

Cllr Hossack varied the agenda in order to take Urgent Business ahead of the Exempt agenda item.

An item for Urgent Business was brought to this committee by Cllr Barrett in relation to recent events in Ukraine.



After a full discussion, Cllr Hossack **MOVED** and Cllr Parker **SECONDED** recommendations below. A vote was taken and it was **RESOLVED UNANIMOUSLY**.

**Members agreed that:**

R1. This Committee recommends to the next Ordinary Council Meeting, that we as a Council condemn the illegal invasion of Ukraine by Putin, and that the Mayor, as first citizen of the Borough, endorses this position on behalf of the Council, alongside a minute's silence for the victims of this invasion.

We, as Brentwood Borough Council, stand together with our residents if Ukrainian heritage and will support them in their hour of need.

We have residents of Ukrainian heritage in our Borough. They are understandably fearing for the lives of their loved ones in Ukraine. The Borough has already demonstrated our solidarity with the Ukrainian community by lighting up the Town Hall in the colours of Ukraine and we are flying the flag of Ukraine.

We welcome the actions of Brentwood Mutual Aid and other groups in bringing the community together to support the people of Ukraine.

That we acknowledge this is an act of aggression by Putin, not by residents of Russian heritage living and working in Brentwood.

We must support all of our residents here to live peaceful lives without fear or anxiety.

We pride ourselves in welcoming residents from all over the world. We will warmly welcome Ukrainians to our Borough as part of any national refugee effort.

We urge:

- Peace.
- Residents to come together in difficult times and support each other when the burden can seem heavy.
- People to support the Ukrainian communities across Essex who are mobilising in support of Ukraine by donating to funds which they have set up to provide critical support for Ukraine at this time.
- The Government to do everything possible to support the Ukrainian people who are being displaced from their homeland including welcoming them into this country.

**R2.** Officers are asked to respond to the following as soon as practicable:

- Confirm if our housing department has contracts for the supply of gas with Gazprom, and if so that this is the Russian state-owned gas company.
- That if confirmed, this contract may directly fund the Putin-regime and in effect have an impact on the illegal invasion of Ukraine.
- Confirm that many companies, organisations and countries have chosen to exit contracts with Gazprom on this basis.

That Officers will:

- Endeavour to find a legal route to exit this contract at the earliest opportunity.

- That an urgent report is brought to the next appropriate committee meeting of Brentwood Borough Council with a proposal to exit this contract by the most expedient legal means, when the status is confirmed.
- If necessary, and no appropriate meeting is available, an extra meeting of an appropriate committee to be called as soon as is practicable.

**339. Exclusion of the Press and Public**

A motion was **MOVED** by Cllr Hossack and **SECONDED** by Cllr Parker that the public be excluded from the meeting on the items of business 7 on the grounds that the disclosure of exempt information as defined in schedule 12A of the Local Government Act 1972.

A vote was taken by a show of hands and was **RESOLVED UNANIMOUSLY**.

**340. EXEMPT - Seven Arches Investments Limited 2021/22 Business Plan**

At 9.00pm in accordance with Rule 10.1 of the Council's procedural rules, Members resolved to continue the meeting for a further 30 minutes.

A presentation was given to members on the Seven Arches Investment Limited 2021/22 Business Plan.

A motion was **MOVED** by Cllr Hossack and **SECONDED** by Cllr Parker and was **RESOLVED**.

**The meeting concluded at 9.15pm**

# Agenda Item 3

<b>Committee(s):</b> Policy, Resources & Economic Development Committee	<b>Date:</b> 13 July 2022
<b>Subject:</b> 2021/22 Financial Outturn	<b>Wards Affected:</b> All
<b>Report of:</b> Jacqueline Van Mellaerts, Corporate Director (Finance and Resources)	<b>Public</b>
<b>Report Author/s:</b> Name: Phoebe Barnes, Corporate Manager - Finance Telephone: 01277 312500 E-mail: phoebe.barnes@brentwood.gov.uk	<b>For Information</b>

## Summary

This report gives a summary of the overall financial outturn position for the financial year 2021/22.

The key elements of the provisional outturn are:

### General Fund

- 1) The outturn for the general fund is balanced position for 2021/22 compared to a budgeted surplus set at £240k
- 2) In March 2022 it was forecasted that the outturn position would be of a break-even position.
- 3) Working balances remain at £2.874 million this is still within the minimum level of reserves.
- 4) General Fund earmarked reserves have increased by £1.663 million to £12.446 million. Of which £5.196 million is committed for COVID-19 mitigation, £0.617 million is committed for specific future commitments, £2.362 million is committed for service level expenditure and £4.271 million is committed for future financial mitigation.

### Housing Revenue Account

- 1) The outturn reflects a net underspend of £447k against the working budget of £434k.
- 2) The HRA working balance has increased significantly to £1.922 million as at the 31<sup>st</sup> March 2022
- 3) The HRA earmarked reserves remain have increased by £100k to £2.5 million

### Capital

- 1) The capital outturn was £15.390 million compared to a reported revised budget of £33.306 million
- 2) Requested slippage of £17.532 million will be carried forward into 2022/23

## Treasury Management

- 1) The treasury activity and relevant prudential indicators for the year is listed in Appendix B.

The Draft Annual Financial Statements 2021/22 have been prepared and will be reported to Audit & Scrutiny Committee on 25<sup>th</sup> July 2022 to meet the Council's publication deadline by the end of July. The draft accounts are subject to an external audit process, which will later in the year. Until the audit is finalised the figures included within this report is a provisional outturn and could be subject to change. Any changes to the outturn will be reported back to this committee once the Annual Financial Statements 2021/22 have been audited.

## **Main Report**

### **Introduction and Background**

1. The provisional outturn forms part of the preparation of the Council's Statement of Accounts for 2021/22. The outturn is reported prior to the audit of the Council's Accounts by the Council's external auditors – Ernst & Young LLP.
2. The provisional outturn does not usually change because of the audit, however due to the ongoing impact of COVID-19 on the local economy as well as the current economic climate there is likely to be more challenges facing the Council's financial position. The Council must consider these impacts ensuring the Council can demonstrate it remains a going concern as an entity.
3. In line with the Local Government Act 2003, the relevant CIPFA codes of Practice and the Council's associated Treasury Management Policy and Practices, the outturn is presented to Members.

### **Issue, Options and Analysis of Options**

#### **General Fund and Housing Revenue Account (HRA)**

4. Appendix A summarises the outturn position for each of the Council's revenue funds, general fund and HRA. Page 12 of Appendix A details the variances per corporate priority. It compares it to working budget for 2021/22 to the outturn and then the outturn adjusted by the movement in reserves. The high-level summaries of the General Fund and HRA are tabled below.

### General Fund Outturn 2021/22

	2021/22 Budget £'000	2021/22 Outturn £'000	Variance
Total Cost of Services	8,571	9,148	577
Total Funding	(8,811)	(9,148)	(338)
Deficit/(Surplus)	(240)	0	240
Working Balance b fwd	2,874	2,874	0
<b>Working Balance C fwd</b>	<b>3,114</b>	<b>2,874</b>	<b>240</b>

### HRA Outturn 2021/22

	2021/22 Budget £'000	2021/22 Outturn £'000	Variance
Total Expenditure	10,371	10,544	174
Total Income	(13,245)	(13,461)	(216)
Non-Service Expenditure	2,440	2,475	35
Deficit/(Surplus)	(434)	(442)	(8)
Working Balance b fwd	1,480	1,480	0
<b>Working Balance C fwd</b>	<b>1,914</b>	<b>1,922</b>	<b>8</b>

5. To analyse the variances a subjective analysis per cost centre under each corporate strategy heading has been produced be found within Appendix A

6. In summary the £240k variance caused within the General fund was associated to the following:

#### Growing Our Economy

The adjusted variance was a pressure of £38k against a current budget of £1,088k. This is attributable to:

- External supplies and services costs under asset development were assumed to be funded by a contribution from earmark reserves. Instead, the costs have been offset against other savings within the budget.

- Small underspend on agency costs regarding LDP costs and planning enforcement.

### Protecting Our Environment

The adjusted variance was a pressure of £162k against a current budgeted income of £2,248k. This is attributable to:

- Parking Income has seen a significant decline associated with the impact of the COVID-19 pandemic. Income lost was £768k. The drawdown on earmarked reserve is to fund the consultancy support in developing the car park strategy.
- Additional pressures are from the increase in transport costs regarding fuel and vehicle repairs and maintenance on the Council's ageing fleet.
- Asset management has seen an increase in income associated to Childerditch rent reviews increasing generating additional returns. With savings made against premises costs.
- Building control have held a vacancy during the year to generate a saving to offset the decrease in income.
- CCTV underspend is due to vacancies within the structure.
- Cemeteries have seen an increase in income from fees and charges increases as well a saving on the establishment due to vacancies.
- Depot Management underspends are linked to vacancies held whilst revised management structures are trialled.
- Licensing has seen a pressure on income from the impact of the pandemic. With Taxi income falling along with other licenses.
- Street Services underspend is made up from vacancy savings with employee expenditure.
- The change is how the Council recycles has generated the Council additional income over the budgeted amount. The success of the scheme has reduced costs which have been utilised to support the additional staffing costs for the scheme as well as for the social distancing that was required during 2021/22.

### Developing Our Communities

The adjusted variance was a saving of £181k against a current budget of £995k. This is attributable to:

- Communities' health and leisure the costs of the Council operating the Brentwood Centre until SLM were awarded the contract are captured here. Some of the costs were offset by a grant from Sport England, as well as a contribution from earmark reserves.
- Golf Course underspend is mainly attributable to an increase in income from the increase and changes made to Fees and Charges.

### Delivering an Efficient & Effective Council

The adjusted variance was a saving of £3,844k against a current budget of £5,250k. This is attributable to:

- Expectation that income would be made from loaning to the joint venture to develop sites within the borough. Delay to the schemes have resulted in the savings target to materialising.
- Corporate Finance savings are linked long term vacancy held whilst the structure is looked at and revised, as well as not utilising contingency budget.
- Corporate Management overspend is attributable to the increase costs in brokerage fees and audit fees.
- Corporate Support underspend is due to a vacancy within the structure.
- Council Tax and NNDR overspend is delay to the One Source debt collection scheme due to the pandemic.
- Customer and Performance have held vacancies with the contact centre to determine options around the delivery of the service for the future, plus the recharge to the HRA has increased as more calls have been taking for tenants.
- Design & Print Services decrease in costs are due to less printing and photocopying now officers work hybrid.
- Digital Services & transformation recently implemented a new structure. Vacancies have been held in this structure that has generated a saving to offset pressures around contracted services for the cloud environment. However, these posts are now currently being advertised.
- Electoral Services underspend is due to a vacant post.
- Executive Board underspend is due to the vacant Strategic Director post remaining vacant for the year whilst the Council explored and developed the Rochford Partnership.
- Human resources underspend is due to underspend on the apprenticeship levy and the corporate training budget. Due to leavers during the year some fees have been repaid, these are to be earmarked to support future staff development. The contingency budget has not been drawn down on whilst the service is reviewed to determine the requirement and therefore the structure needed to deliver.
- Office Accommodation has seen a decrease in costs required on premises as well as additional income regarding commercial income for office space and rental income from the flats being fully occupied.

### Improving Housing

The adjusted variance was a pressure of £803k against an income budget of £649k. This is attributable to:

- The unrealised target of £759k for the housing delivery model that is no longer going ahead. This pressure has been offset by contributing less to earmark reserves.

## Net Non-Service Expenditure

Total pressure on net non-service expenditure is £822k. This is attributable to:

- Decrease in general bad debt provision. The decrease is due to reviewing debt and no longer making an additional provision for covid as assumption assume the debt levels now account for the covid impact.
- Interest payable is higher than budget, due to taking the opportunity to replace short term debt with long term PWLB debt when rates dropped below internal thresholds. Therefore, the additional pressure is the cost of carrying this debt earlier than planned.
- Interest on surplus cash has not achieved the budget forecast.
- Investment properties budget needs to be realigned with revised forecasts within the lease register.
- Underspends on the pension fund contribution and MRP provision are to be earmarked into an inflation and financing reserve to support the financial risk to the council regarding the current economic climate.

## Funding

Funding increased by £338k compared to a current budget of £8,811k. Much of this increase is associated to the extension of the covid income compensation grant into the first quarter of the budget year. The £254k was not built into the current budget and the additional income offsets some of the parking income loss the Council has incurred.

7. For the HRA the increased in the budgeted surplus of £8k was due to the following factors:
  - a) An increase in repairs & maintenance costs.
  - b) Utility charges are increasing, for 2021/22 this are associated with the cost of holding sites void that have been earmarked for development under the SHDP programme.
  - c) Due to the pandemic and being unable to chase arrears the rent arrears has increased, in turn, this has resulted in a larger provision of bad debt being provided against the arrears balance.
  - d) Garage Income is less than budget this is for sites that are now void as they are earmarked to be developed.
  - e) Pension costs are higher and this budget needs aligning going forward.



- f) The HRA has contributed less revenue to its capital program. This has allowed the HRA working balance to rejuvenate.

### Collection Fund

- 8. The Collection Fund is a statutory account relating to the administration of Council Tax and Business Rates. The account is administered by Brentwood as “billing authority” on behalf of relevant precepting authorities, including the Borough, and, in the case of Business Rates, also the central government. The account records all income due in respect of Council Tax and Business Rates. The precepts due to the participating bodies are debited to the account. Any balance remaining on the account following these transactions is normally shared proportionately between the precepting bodies in the following financial years. For deficits arising in 2021/22, the Government permits these to be phased over the following two years.
- 9. For 2021/22 the financial position of the Collection Fund is as follows:
  - a) Business Rates. There is a deficit of £14,393k, of which the Council's share is £5,757k. The deficit is mainly due to the business rate reliefs awarded by the Government to businesses to support them during the pandemic. The government compensated the Council directly for the loss of income due to these reliefs. This leaves a deficit of £1,110k, which will be debited to the General Fund in a phased approach over the next three financial years. £610k of this amount will be debited in 2021/22, but this will be partly offset by £512k grant from the Government to compensate the Council for loss of tax income in 2020/21.

The Council is member of the Essex Business Rates Pool. The Council's business rates income for 2020/21 was below the level at which a levy was payable.

- b) Council Tax. There is a surplus of £708k, of which the Council's share is £82k. The Council gave reliefs to Council Tax Payers totalling £319k, which were funded through Council Tax Hardship Grant from the Government.

## Earmarked Reserves

10. Within Appendix A, it sets out the drawdown to and from earmarked reserves in detail. In summary the following movement on earmarked reserves is as follows:

	<b>Opening Balance</b>	<b>Contribution To/(From)</b>	<b>Closing Balance</b>
Mitigation	1,944	2,327	4,271
Service	1,738	624	2,362
Specific	1,059	(442)	617
COVID-19	6,042	(846)	5,196
<b>Total</b>	<b>10,783</b>	<b>1,663</b>	<b>12,446</b>

11. The detail regarding earmarked reserves is within Appendix A. The new earmarked reserves to be created are as follows:

<b>Reserve Name</b>	<b>Type</b>	<b>Amount £'000</b>
Inflation & Financing Mitigation	Mitigation	810
Rochford Partnership	Service	300
Staff Achievement & Recognition	Service	3
Other Licences	Service	3
HR Corporate Training	Service	18
HR Apprenticeship Incentive Training	Service	8
ARG Grant	COVID	24
New Burdens re Post Assurance Reconciliation	COVID	131

<b>Total</b>		<b>1,297</b>
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### Capital and Investment Strategy

12. Enclosed within Appendix B is the capital and investment report. Capital projects approved as part of the 2021/22 budget cycle are tabled and compared to the projects working budget.

13. In summary the capital outturn is as follows:

	<b>2021/22 Budget £'000</b>	<b>2021/22 Outturn £'000</b>	<b>Variance</b>
Total General Fund Capital Programme	17,193	9,114	(8,079)
Total HRA Capital Programme	16,113	6,276	(9,837)
<b>Total Capital Programme</b>	<b>33,306</b>	<b>15,930</b>	<b>(17,916)</b>
Total General Fund Capital Funding	17,193	9,114	(8,079)
Total HRA Capital Funding	16,113	6,276	(9,837)
<b>Total Capital Funding</b>	<b>33,306</b>	<b>15,390</b>	<b>(17,916)</b>

14. For 2021/22 there has been external factors that have delayed delivery of certain capital projects. The ongoing impacts of the pandemic are still affecting the market, enhanced with the war in Ukraine and leaving the EU. These external factors have affected contractors to resource and deliver, the price of materials meaning some projects become unviable financially, and sourcing materials and parts delaying the delivery of purchased items, all impact the end customer.

15. As part of the strategy, slippage for certain projects have been requested by services and reviewed by the section 151 officer. The total amount of slippage requested is £17.532 million and does not exceed what has previously been approved for specific projects by Ordinary Council. The reason for the requirement of slippage is detailed within the appendix B.

16. Finally, Appendix B also includes a review of the Council's treasury Management activities during the year. Alongside this is an update on Council's prudential indicators for the year.

### **Consultation**

17. The Outturn has been presented to the senior leadership team, the leader, deputy leader and the Chairs of Committees.

### **References to Corporate Plan**

18. The outturn underpins the ability to be able to deliver the aspirations outlined within the Corporate Strategy by managing our finances and contracts robustly to ensure best value for money and deliver services meets the needs of our residents.

### **Implications**

#### **Financial Implications**

**Name/Title: Jacqueline Van Mellaerts, Corporate Director (Finance & Resources)**

**Tel/Email: 01277 312500/jacqueline.vanmellaerts@brentwood.gov.uk**

19. Financial implications have been included within the main body of the report and appendices.

#### **Legal Implications**

**Name & Title: Amanda Julian, Corporate Director (Law & Governance) and**

**Monitoring Officer**

**Tel & Email: 01277 312500/amanda.julian@brentwood.gov.uk**

20. The Council is obliged under Section 151 of the Local Government Act 1972 to make proper arrangements for the management of its financial affairs.

#### **Economic Implications**

**Name/Title: Phil Drane, Corporate Director (Planning and Economy)**

**Tel/Email: 01277 312500/philip.drane@brentwood.gov.uk**

21. Growing our economy is a corporate priority. Everything the council does contributes to or impacts the borough's economy in some way, either directly or indirectly. It is important that the council maintains a budget that considers such implications. In this case, it is important to regularly monitor and publish the final overall financial outturn position.

**Other Implications**

Risk Management – Managing the Council's finances

**Background Papers**

Medium Term Financial Strategy 2021/22

**Appendices to this report**

Appendix A: General Fund Revenue Outturn 2021/22

Appendix B: Capital & Investment Strategy Outturn 2021/22

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**BRENTWOOD  
BOROUGH COUNCIL**

Brentwood Borough Council  
Revenue  
2021/22 Outturn

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## General Fund 2021/22

### Introduction

This enclosure summarises the provisional outturn position (subject to external audit process) for each of the Council's revenue funds and compares these with the corresponding working budget for the year.

A summary of the net position is set out below. There is an overall balanced position in the net cost of services compared to the surplus of £240k that was set.

The current budget is the original budget for the year plus items brought forward from the previous year plus other budget amendments approved during the year.

Some of the costs incurred during the year have been funded from earmarked reserves and surplus income received have been earmarked for specific purposes. The table below looks to highlight the impact of the contribution to and from reserves on the actual position on the total cost of services.

Service Net Expenditure	Current Budget	Actuals	Variance	Earmarked Reserve Adj	Revised Actual	Revised Variance
	£'000	£'000	£'000	£'000	£'000	£'000
Developing Our Communities	995	979	(16)	(164)	814	(181)
Efficient & Effective Council	5,250	4,814	(435)	51	4,865	(385)
Growing Our Economy	1,087	772	(316)	354	1,126	39
Improving our Housing	(649)	154	803	0	154	803
Protecting Our Environment	(2,248)	(2,015)	233	(72)	(2,086)	162
Contingency & Savings	(175)	0	175	0	0	175
<b>Total Corporate Priority Spend</b>	<b>4,260</b>	<b>4,704</b>	<b>444</b>	<b>169</b>	<b>4,873</b>	<b>613</b>
Debt Impairments	112	(47)	(159)	159	112	0
Interest Payable	2,223	2,388	165	0	2,388	165
Investment Income	(3,189)	(2,707)	482	0	(2,707)	482
Pension Fund	1,108	929	179	179	1,108	0
Provision for Loan Repayment	1,289	1,071	218	218	1,289	0
<b>Total Non-Service Expenditure</b>	<b>1,543</b>	<b>1,634</b>	<b>91</b>	<b>556</b>	<b>2,190</b>	<b>822</b>
Appropriations	2,768	2,085	(683)	0	2,085	(683)
<b>Total Cost of Services</b>	<b>8,571</b>	<b>8,423</b>	<b>(148)</b>	<b>725</b>	<b>9,148</b>	<b>577</b>

The total Net Service Expenditure has been funded as set out in the table below.

	Current Budget	Actuals	Variance	Earmarked Reserve Adj	Revised Actual	Revised Variance
	£'000	£'000	£'000	£'000	£'000	£'000
Council Tax	(6,438)	(6,438)	0	0	(6,438)	0
New Homes Bonus	(529)	(529)	0	0	(529)	0
Other Grants	(71)	(154)	(83)	0	(154)	(83)
Business Rates Retention	(1,634)	(5,421)	(3,787)	3,787	(1,634)	0
COVID-19 Grant	(309)	(309)	0	0	(309)	0
Income Compensation Grant	0	(254)	(254)	0	(254)	(254)
Collection Fund Deficit	170	5,125	4,955	(4,955)	170	0
<b>Total Funding</b>	<b>(8,811)</b>	<b>(7,980)</b>	<b>831</b>	<b>(1,168)</b>	<b>(9,148)</b>	<b>(337)</b>

When the funding has been considered the overall outturn is a drawdown on working balance of £240k.

	Current Budget	Actuals	Variance	Earmarked Reserve Adj	Revised Actual	Revised Variance
	£'000	£'000	£'000	£'000	£'000	£'000
Total Cost of Services	8,571	8,423	(148)	725	9,148	577
Total Funding	(8,811)	(7,980)	831	(1,168)	(9,148)	(337)
<b>Deficit/(Surplus)</b>	<b>(240)</b>	<b>443</b>	<b>683</b>	<b>(443)</b>	<b>0</b>	<b>240</b>

The General Fund Working Balances is £2.874m for the year ending 31<sup>st</sup> March 2022 and will be shown on the Council's balance sheet.

	Current Budget	Actuals	Variance
	£'000	£'000	£'000
Working Balance B/fwd	2,874	2,874	0
Deficit/(Surplus)	(240)	0	240
Working Balance C'fwd	3,114	2,874	240

## Earmarked Reserves Adjustment

The presented outturn position is a balanced position by utilising adjustments to and from earmarked reserves. This section looks to highlight the reason for these adjustments.

### Developing Our Communities

Grant income totalling £36k for test & trace and the Health & Wellbeing board have been earmarked as these grants are ringfenced specifically to costs incurred for these schemes.

The Council has utilised £200k of the Leisure Reserve set aside to support the costs of supplying agency staff at the Brentwood Centre as the Centre came back under Council control following the pandemic

### Efficient & Effective Council

Following the pandemic there were delays to elections. The costs (£70k) for the local elections held in 2021/22 were funded through the earmark reserve created the previous financial year. A further £84k has been draw upon to support the additional legal fees incurred for the large projects the Council currently undertaking.

The outturn forecast the creation of two reserves one for corporate training (18k) and the other to offer apprenticeship incentives (8k), these are from underspends within the current budgets.

Due to an underspend within the Emergency Planning budget, it is proposed this underspend is contributed to the risk and insurance reserve to support future costs arising from risk management.

New burdens grant funding received of £166k is required to be earmarked and support costs in the next financial year.

### Growing Our Economy

Grant income received regarding COVID-19 grants totalling £154k are required to be earmarked as they are unspent and ringfenced grants, meaning the income cannot contribute to other costs that are not specific to the grant funding requirements.

During 2021/22 planning application income exceeded budget, some of the income has been used in year to offset the pressures resulting from the adoption on the Local Development Plan. The net balance of £198k has been earmarked to support Planning Enforcement costs as well as resourcing required to support the Planning Team now the LDP has been adopted with future planning applications.

### Protecting Our Environment

Earmark reserves have been drawn down upon to fund, consultancy support for the Parking Strategy, to fund the costs associated with funding the climate and sustainability officer and to utilise the Night-time Economy grant received the previous year in supporting legislation imposed during the pandemic.

## Total Non-Service Expenditure

The Council reviewed its bad debt impairments at the end of year, this review highlighted that the Council believes it has over provided on the debts and therefore the budgeted provision was not required. In addition, there have been underspends on the Council's pension budget and minimum revenue provision. These underspends are to be contributed to a new reserve to help support the future mitigation of inflation and financing costs. The Council believes based on the current economic climate it is prudent to set aside some money to help smooth future pressures that could arise.

## Funding

Contributions to and from the NDR Collection Fund Deficit and Tax Income Guarantee Scheme to offset future deficits on the Collection Fund. These deficits arise from the granting by Government of business rates relief to businesses in the retail, hospitality & leisure sectors. The loss of business rates income is paid in advance to the Council as S31 grant and is held in these earmarked reserves to offset future Collection Fund deficits.

## Earmarked Reserves

As part of the year end procedures the Council must review its Earmarked Reserves. These Reserves are required to comply with proper accounting practice, whilst others have been created to earmark resources for known or predicted liabilities.

After taking into account the earmark reserve adjustments highlighted to present a balanced budget. The total reserve balance at 31st March 2022 is £12,446k; the in year movement was a net position of £1,663k.

The reserves are grouped into 4 types of reserves.

- Service – Monies requested by the service from existing budgeted to be used on specific plans or projects.
- Specific – Monies that the Council has received that have restricted conditions on how the money can be used.
- Mitigation – Earmarked specifically to mitigate financial risks to the Council.
- COVID-19 – Specific Monies set aside due to funding received during the pandemic to be utilised in the short-term as the pandemic impact continues.

Reserve	Opening Balance April 2021  £'000	Drawdown/ Contribution  £'000	Closing Balance* March 2022  £'000
<b>Total General Fund Earmarked Reserves</b>	<b>10,783</b>	<b>1,663</b>	<b>12,446</b>
<b>Total Mitigation Reserves</b>	<b>1,944</b>	<b>2,327</b>	<b>4,271</b>
Funding Volatility	1,343	0	1,343
Housing benefit Subsidy	150	0	150
Insurance and Risk Management	25	12	37
In Borough Regeneration	426	1,505	1,931
Inflation & Finance Mitigation	0	810	810
<b>Total Service Reserves</b>	<b>1,738</b>	<b>624</b>	<b>2,362</b>
Asset Management	164	0	164
Economic Development	300	0	300
Electoral Registration	43	0	43
Planning Delivery Grant	0	0	0
High Street Fund	200	0	200
Environmental Initiatives	92	108	200
Planning Enforcement	130	50	180
Service Investment and Initiatives	196	4	200
Leisure Contingency	200	(128)	72
Legal Resource	100	0	100
LGV Driver Training	10	0	10
Parking Strategy/MSCP Clean	21	(21)	0
ICT/Digital Transformation	134	0	134
Planning Development	78	149	227
Election Costs	70	(70)	0
Rochford partnership	0	300	300
Street Scene Initiatives	0	200	200
Other Licences	0	3	3
Corporate Training	0	18	18
Apprentice Incentives	0	8	8
Staff Recognition & Awards	0	3	3

Reserve	Opening Balance April 2021 £'000	Drawdown/ Contribution £'000	Closing Balance* March 2022 £'000
<b>Total Specific Reserves</b>	<b>1,059</b>	<b>(442)</b>	<b>617</b>
Duchess Of Kent/Nightingale	298	(6)	292
Health and Wellbeing	81	22	103
Land at Hanover House	10	0	10
Neighbourhood Plan	26	0	26
Preventing Homelessness	100	0	100
Willowbrook Rosen Crescent (S106)	7	0	7
Waste Management	405	(405)	0
EU EXIT	53	(53)	0
Open Data Funding to LA's	1	0	1
Brentwood community hospital	40	0	40
Community rights	38	0	38
<b>Total COVID Specific Reserves</b>	<b>6,042</b>	<b>(846)</b>	<b>5,196</b>
COVID 19	412	0	412
NNDR Collection Fund Deficit	4,740	(1,016)	3,724
Tax Income Guarantee Scheme (CT and NNDR)	591	(151)	440
ARG Grant	0	24	24
New Burdens Post Payment Reconciliation	0	131	131
ECC - Night Time Economy Grant	14	(14)	0
Council Tax Hardship Fund	26	0	26
New Burdens for SBSG (covid-19) Discretionary scheme	130	0	130
New Burdens LADGF (covid-19)	59	166	225
Test and Trace Admin	50	14	64
New burdens CT Hardship Fund and BRR	20	0	20

\*Closing balance is subject to approval of Audited Financial Statements 2021/22

## Earmarked Reserve Detail

### Mitigation Reserves

- Funding Volatility** - Fund to mitigate the uncertainty and financial risks regarding the Government Funding
- Housing Benefit Subsidy Smoothing** - To support the funding of subsidy claims
- Insurance and Risk Management** – To support and mitigate high risks identified through the risk register.

- d. **In Borough Regeneration** – Specifically set aside to mitigate future financing risk on redevelopment of Town Centre project.
- e. **Inflation & Financing Mitigation** – Funds to support the uncertainty of the Council's short term finances regarding the current cost of living crisis.

#### Service Reserves

- e. **Asset Management** – Support Asset management team for reactive compliance works.
- f. **Economic Development** – To be drawn down in delivering the corporate strategy aim of growing the economy.
- g. **Election Costs** – To fund election services costs - Reserve has been reduced to zero as it has met the objectives of its purpose.
- h. **Electoral Registration** – fund to be utilised for any unexpected upcoming elections
- i. **Environmental Initiatives** – specifically set aside to support the green agenda for the Council.
- j. **Digital, Customer & Comms** – To fund schemes such as customer service accreditation, customer contact training and development of social media engagement
- k. **High Street Fund** – Held to invest in improving the high streets, generating, and retaining economic growth.
- l. **HR Corporate Training** – Repayment of professional fees have been earmarked to support investment in staff for the future.
- m. **HR Apprentice Incentive Programme** – to maintain a rolling programme of apprenticeships at the Council.
- l. **Legal Resource** – To support legal services with unexpected case work.
- m. **Leisure Contingency** – To support the interim direct management by the Council of the Brentwood Leisure Centre - Reserve has been reduced to zero as it has met the objectives of its purpose.
- n. **LGV Driver Training** – To fund mandatory CPC training for LGV drivers
- o. **Other Licences** – pavement licence grant to be utilised in the next financial year.
- o. **Parking Improvements** – To fund specialised cleansing in the multi storey Car park and Parking Strategy. Reserve has been reduced to zero as it has met the objectives of its purpose
- p. **Planning Development** – To fund future costs associated with dealing with planning applications
- q. **Planning Enforcement** – To aid in supporting the planning enforcement work across the borough.
- r. **Rochford Partnership** – New Reserve - To set aside funding required for partnership – Subject to Full Council Decision
- s. **Service Investment and Initiatives Reserve** – to support the Council in mitigating one off costs against the agreed budget for any identified service investment or initiatives in year.
- t. **Staff Achievement & Recognition** – Funds to recognise and celebrate staff achievements
- t. **Street Scene Initiatives** – New Reserve - To fund development of one off initiatives within Street Scene service area.



### Specific Reserves

- u. **Community Rights** – Government grant provided to assist in the implementation of the Localism act.
- v. **EU Exit** – To fund preparations required of the Council when the UK exits the EU. Reserve has been reduce to zero as it has met the objectives of its purpose
- w. **Health & Wellbeing** – Available for projects determined by the Brentwood health & Wellbeing board
- x. **Neighbourhood Plan** – A carry forward of government grants to be used in the connection with Doddinghurst and West Horndon neighbourhood plans.
- y. **Open Data Funding** - To support the anticipated additional work for DCN authorities related to open UPRN/USRN data
- z. **Preventing Homelessness** – to aid in meeting the requirements of homelessness and any legislative changes
  - aa. **Section 106** – For contributing to costs for public open space improvements; maintaining grounds from previous S106 receipts.
  - bb. **Waste Management** - To fund the development of waste management within the Borough. Reserve has been reduced to zero, moved to service reserves and renamed as street scene initiatives.

### COVID-19 Reserves

- cc. **ARG** – Grant funding that has conditions and has been earmarked as pending the reconciliation process this may need to be repaid to Government.
- dd. **Council Tax Hardship Fund** – To fund Council Tax financial hardship for Council Tax Payers
- dd. **COVID 19 Funding Volatility** – To mitigate any financial pressures on services caused by the COVID-19 pandemic
- ee. **ECC – Night Time Economy Grant** – To fund night time economy within the Borough
- ff. **NDR Collection Fund Deficit** – To carry forwards S31 Grants received in 2020/21 to offset the deficit carried forward on the NDR Collection Fund due to the extended Retail Relief Scheme in 2020/21
- gg. **New Burdens CT Hardship Fund & BRR** – To fund the administration of delivering Council Tax and Business Rate Relief
- hh. **New Burdens LADGF** – To fund administration of local authority discretionary grants
- ii. **New Burdens Post Payment Assurance Rec** – To fund the resources required to reconcile and evidence all the data required back to Central Government regarding all administered grants.
- ii. **New Burdens SBSG** – To fund administration of COVID-19 grants to support small businesses
- jj. **Test and Trace Admin** – To fund administration of Test & Trace
- kk. **Tax Income Guarantee Scheme** – To offset future deficits of the Collection Fund

## General Fund Subjective Variances

Detailed in the tables below are the subjective variances for each area under each corporate strategy heading. This is to highlight the variances and costs associated in delivering the Corporate Strategy. Adjustments between earmarked reserves have been presented to show the impact of utilising reserves this financial year.

	Budget	Actual outturn	Variance	Earmark Reserves Adjustments Drawdown	Earmark Reserve Adjustment Contribution to	Revised Actual	Variance to CB
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
<b>Brentwood 2025– Service Expenditure</b>							
<b>Growing Our Economy</b>	1,088	772	(316)	0	354	1,126	38
<b>Asset Development</b>	0	51	51	0	0	51	51
Supplies & Services	51	51	(0)			51	(0)
Third Party Payments	1	1	0			1	0
Income - Transfers/Appropriatio	(51)	0	51			0	51
<b>Economic Development</b>	180	25	(154)	0	155	180	1
Employee Related Expenditure	91	107	16			107	16
Premises Related Expenditure	0	0	0			0	0
Transport Related Expenditure	0	0	0			0	0
Supplies & Services	230	1,244	1,014			1,244	1,014
Third Party Payments	0	0	0			0	0
Transfer Payments	0	0	0			0	0
Government Grants	(135)	(1,247)	(1,112)		155	(1,092)	(957)
Income - Transfers/Appropriatio	0	0	0			0	0
Other Grants & Reimbursements	(6)	(78)	(72)			(78)	(72)
<b>Land Charges</b>	(26)	(68)	(41)	0	0	(68)	(41)
Employee Related Expenditure	62	62	0			62	0
Supplies & Services	34	4	(29)			4	(29)
Third Party Payments	31	30	(1)			30	(1)
Customer & Client Receipts	(153)	(164)	(11)			(164)	(11)
<b>Planning Development Managemt</b>	(149)	(257)	(107)	0	199	(58)	91
Employee Related Expenditure	667	688	21			688	21
Transport Related Expenditure	2	2	(0)			2	(0)
Supplies & Services	182	178	(5)			178	(5)
Third Party Payments	183	182	(2)			182	(2)
Transfer Payments	0	0	0			0	0
Customer & Client Receipts	(1,184)	(1,306)	(122)		199	(1,107)	77
Income - Transfers/Appropriatio	0	0	0			0	0
Other Grants & Reimbursements	0	0	0			0	0
<b>Planning Enforcement</b>	247	197	(50)	0	0	197	(50)
Employee Related Expenditure	245	195	(50)			195	(50)
Transport Related Expenditure	1	0	(0)			0	(0)
Supplies & Services	1	1	(0)			1	(0)
Third Party Payments	0	0	0			0	0
Income - Transfers/Appropriatio	0	0	0			0	0
<b>Planning Policy</b>	838	824	(14)	0	0	824	(14)
Employee Related Expenditure	226	213	(14)			213	(14)
Transport Related Expenditure	0	0	(0)			0	(0)
Supplies & Services	346	345	(1)			345	(1)
Third Party Payments	266	266	0			266	0
Transfer Payments	0	0	0			0	0
Government Grants	0	0	0			0	0
Income - Transfers/Appropriatio	0	0	0			0	0

	Budget	Actual outturn	Variance	Earmark Reserves Adjustments Drawdown	Earmark Reserve Adjustment Contribution to	Revised Actual	Variance to CB
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
<b>Protecting Our Environment</b>	<b>(2,248)</b>	<b>(2,015)</b>	<b>233</b>	<b>(76)</b>	<b>4</b>	<b>(2,086)</b>	<b>162</b>
<b>Asset Management</b>	<b>(3,509)</b>	<b>(3,632)</b>	<b>(123)</b>	<b>0</b>	<b>0</b>	<b>(3,632)</b>	<b>(123)</b>
Employee Related Expenditure	118	99	(19)			99	(19)
Premises Related Expenditure	491	411	(81)			411	(81)
Transport Related Expenditure	0	0	(0)			0	(0)
Supplies & Services	42	45	3			45	3
Third Party Payments	21	21	(0)			21	(0)
Customer & Client Receipts	(3,944)	(4,062)	(118)			(4,062)	(118)
Other Grants & Reimbursements	(20)	(19)	1			(19)	1
Recharges - Internal Income	(218)	(126)	92			(126)	92
<b>Building Control</b>	<b>92</b>	<b>53</b>	<b>(39)</b>	<b>0</b>	<b>0</b>	<b>53</b>	<b>(39)</b>
Employee Related Expenditure	362	299	(63)			299	(63)
Premises Related Expenditure	0	0	0			0	0
Transport Related Expenditure	10	7	(3)			7	(3)
Supplies & Services	18	15	(3)			15	(3)
Customer & Client Receipts	(297)	(267)	30			(267)	30
<b>CCTV</b>	<b>154</b>	<b>103</b>	<b>(51)</b>	<b>0</b>	<b>0</b>	<b>103</b>	<b>(51)</b>
Employee Related Expenditure	193	148	(45)			148	(45)
Premises Related Expenditure	1	1	0			1	0
Transport Related Expenditure	0	0	0			0	0
Supplies & Services	10	5	(6)			5	(6)
Recharges - Internal Income	(51)	(51)	0			(51)	0
<b>Cemeteries</b>	<b>27</b>	<b>(22)</b>	<b>(49)</b>	<b>0</b>	<b>0</b>	<b>(22)</b>	<b>(49)</b>
Employee Related Expenditure	90	64	(26)			64	(26)
Premises Related Expenditure	26	19	(7)			19	(7)
Transport Related Expenditure	2	1	(1)			1	(1)
Supplies & Services	14	14	0			14	0
Customer & Client Receipts	(102)	(119)	(17)			(119)	(17)
Other Grants & Reimbursements	(2)	0	2			0	2
<b>Countryside Recreation Mtnce</b>	<b>42</b>	<b>63</b>	<b>21</b>	<b>0</b>	<b>0</b>	<b>63</b>	<b>21</b>
Premises Related Expenditure	49	71	22			71	22
Supplies & Services	2	1	(1)			1	(1)
Customer & Client Receipts	(10)	(9)	0			(9)	0
Government Grants	0	0	0			0	0
<b>Depot Management &amp; Admin</b>	<b>731</b>	<b>658</b>	<b>(73)</b>	<b>0</b>	<b>0</b>	<b>658</b>	<b>(73)</b>
Employee Related Expenditure	585	519	(66)			519	(66)
Premises Related Expenditure	134	118	(16)			118	(16)
Transport Related Expenditure	7	7	(0)			7	(0)
Supplies & Services	8	7	(1)			7	(1)
Third Party Payments	11	10	(1)			10	(1)
Customer & Client Receipts	(3)	(2)	1			(2)	1
Income - Transfers/Appropriatio	(11)	0	11			0	11
Recharges - Internal Income	0	(1)	(1)			(1)	(1)
<b>Env Health &amp; Licensing Admin</b>	<b>90</b>	<b>100</b>	<b>11</b>	<b>(14)</b>	<b>0</b>	<b>87</b>	<b>(3)</b>
Employee Related Expenditure	61	199	138			199	138
Transport Related Expenditure	0	10	10			10	10
Supplies & Services	2	7	4			7	4
Third Party Payments	26	44	17			44	17
Transfer Payments	0	0	0			0	0
Government Grants	0	(71)	(71)	(14)		(84)	(84)
Income - Transfers/Appropriatio	0	0	0			0	0
Other Grants & Reimbursements	0	(88)	(88)			(88)	(88)

	Budget	Actual outturn	Variance	Earmark Reserves Adjustments Drawdown	Earmark Reserve Adjustment Contribution to	Revised Actual	Variance to CB
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
<b>Environmental Initiatives</b>	<b>8</b>	<b>49</b>	<b>40</b>	<b>(40)</b>	<b>0</b>	<b>8</b>	<b>(0)</b>
Employee Related Expenditure	21	22	0			22	0
Premises Related Expenditure	0	1	1			1	1
Transport Related Expenditure	12	6	(6)			6	(6)
Supplies & Services	18	20	2			20	2
Income - Transfers/Appropriatio	(43)	0	43	(40)		(40)	3
Other Grants & Reimbursements	0	0	0			0	0
<b>Environmental Maintenance</b>	<b>(58)</b>	<b>(58)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>(58)</b>	<b>0</b>
Other Grants & Reimbursements	(58)	(58)	0			(58)	0
<b>Grounds Maintenance</b>	<b>405</b>	<b>404</b>	<b>(1)</b>	<b>0</b>	<b>0</b>	<b>404</b>	<b>(1)</b>
Employee Related Expenditure	618	539	(79)			539	(79)
Premises Related Expenditure	12	11	(1)			11	(1)
Transport Related Expenditure	25	86	61			86	61
Supplies & Services	27	34	7			34	7
Third Party Payments	0	11	11			11	11
Customer & Client Receipts	(17)	(17)	0			(17)	0
Income - Transfers/Appropriatio	0	0	0			0	0
Other Grants & Reimbursements	0	(2)	(2)			(2)	(2)
Recharges - Internal Income	(259)	(258)	1			(258)	1
<b>Licensing</b>	<b>(38)</b>	<b>(31)</b>	<b>7</b>	<b>(1)</b>	<b>4</b>	<b>(28)</b>	<b>10</b>
Employee Related Expenditure	131	121	(10)			121	(10)
Transport Related Expenditure	2	0	(2)			0	(2)
Supplies & Services	36	13	(23)			13	(23)
Third Party Payments	37	37	0			37	0
Transfer Payments	0	0	0			0	0
Customer & Client Receipts	(243)	(197)	46			(197)	46
Government Grants	0	(4)	(4)	(1)	4	(1)	(1)
<b>Other Environmental Services</b>	<b>221</b>	<b>216</b>	<b>(6)</b>	<b>0</b>	<b>0</b>	<b>216</b>	<b>(6)</b>
Employee Related Expenditure	199	154	(45)			154	(45)
Premises Related Expenditure	0	0	0			0	0
Transport Related Expenditure	4	0	(4)			0	(4)
Supplies & Services	24	21	(3)			21	(3)
Third Party Payments	18	63	45			63	45
Capital Financing Costs	0	0	0			0	0
Customer & Client Receipts	(5)	(5)	(0)			(5)	(0)
Government Grants	0	0	0			0	0
Other Grants & Reimbursements	(1)	(1)	0			(1)	0
Recharges - Internal Income	(17)	(17)	(0)			(17)	(0)

	Budget	Actual outturn	Variance	Earmark Reserves Adjustments Drawdown	Earmark Reserve Adjustment Contribution to	Revised Actual	Variance to CB
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
<b>Parking</b>	<b>(1,447)</b>	<b>(766)</b>	<b>681</b>	<b>(21)</b>	<b>0</b>	<b>(787)</b>	<b>660</b>
Employee Related Expenditure	206	131	(75)			131	(75)
Premises Related Expenditure	383	379	(4)			379	(4)
Transport Related Expenditure	1	1	(0)			1	(0)
Supplies & Services	138	93	(44)			93	(44)
Third Party Payments	51	36	(15)			36	(15)
Customer & Client Receipts	(2,174)	(1,406)	768			(1,406)	768
Income - Transfers/Appropriatio	(51)	0	51	(21)		(21)	30
<b>Street Services</b>	<b>517</b>	<b>464</b>	<b>(53)</b>	<b>0</b>	<b>0</b>	<b>464</b>	<b>(53)</b>
Employee Related Expenditure	582	536	(46)			536	(46)
Premises Related Expenditure	28	26	(2)			26	(2)
Transport Related Expenditure	4	2	(1)			2	(1)
Supplies & Services	55	40	(16)			40	(16)
Third Party Payments	30	23	(7)			23	(7)
Customer & Client Receipts	(30)	(34)	(3)			(34)	(3)
Other Grants & Reimbursements	(136)	(129)	7			(129)	7
Recharges - Internal Income	(15)	(0)	15			(0)	15
<b>Vehicle Fleet Management</b>	<b>855</b>	<b>933</b>	<b>78</b>	<b>0</b>	<b>0</b>	<b>933</b>	<b>78</b>
Employee Related Expenditure	50	46	(3)			46	(3)
Premises Related Expenditure	4	1	(3)			1	(3)
Transport Related Expenditure	799	885	86			885	86
Supplies & Services	25	26	1			26	1
Third Party Payments	3	1	(1)			1	(1)
Transfer Payments	0	0	0			0	0
Capital Income	(10)	(11)	(2)			(11)	(2)
Customer & Client Receipts	0	0	0			0	0
Income - Transfers/Appropriatio	0	0	0			0	0
Other Grants & Reimbursements	(7)	(8)	(1)			(8)	(1)
Recharges - Internal Income	(7)	(6)	2			(6)	2
<b>Waste Management</b>	<b>(339)</b>	<b>(550)</b>	<b>(211)</b>	<b>0</b>	<b>0</b>	<b>(550)</b>	<b>(211)</b>
Employee Related Expenditure	1,301	1,565	263			1,565	263
Premises Related Expenditure	0	0	0			0	0
Transport Related Expenditure	15	5	(10)			5	(10)
Supplies & Services	520	280	(239)			280	(239)
Customer & Client Receipts	(1,210)	(1,514)	(303)			(1,514)	(303)
Government Grants	0	0	0			0	0
Income - Transfers/Appropriatio	(30)	0	30			0	30
Other Grants & Reimbursements	(934)	(881)	53			(881)	53
Recharges - Internal Income	0	(4)	(4)			(4)	(4)

	Budget	Actual outturn	Variance	Earmark Reserves Adjustments Drawdown	Earmark Reserve Adjustment Contribution to	Revised Actual	Variance to CB
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
<b>Developing Our Communities</b>	<b>995</b>	<b>979</b>	<b>(16)</b>	<b>(227)</b>	<b>62</b>	<b>814</b>	<b>(181)</b>
<b>Communities, Health &amp; Leisure</b>	<b>645</b>	<b>759</b>	<b>114</b>	<b>(227)</b>	<b>62</b>	<b>595</b>	<b>(51)</b>
Employee Related Expenditure	618	609	(9)			609	(9)
Premises Related Expenditure	197	452	255			452	255
Transport Related Expenditure	6	6	0			6	0
Supplies & Services	285	516	230	(200)		316	30
Third Party Payments	328	356	28			356	28
Transfer Payments	8	0	(8)			0	(8)
Customer & Client Receipts	(534)	(492)	42			(492)	42
Government Grants	(7)	(152)	(144)	(27)	62	(116)	(109)
Income - Transfers/Appropriatio	0	0	0			0	0
Other Grants & Reimbursements	(255)	(536)	(281)			(536)	(281)
<b>Community Safety</b>	<b>96</b>	<b>96</b>	<b>(0)</b>	<b>0</b>	<b>0</b>	<b>96</b>	<b>(0)</b>
Employee Related Expenditure	211	199	(12)			199	(12)
Premises Related Expenditure	3	3	0			3	0
Transport Related Expenditure	7	6	(1)			6	(1)
Supplies & Services	5	3	(1)			3	(1)
Third Party Payments	5	5	0			5	0
Transfer Payments	0	0	0			0	0
Customer & Client Receipts	(1)	(19)	(18)			(19)	(18)
Other Grants & Reimbursements	(33)	(33)	0			(33)	0
Recharges - Internal Income	(100)	(69)	31			(69)	31
<b>Golf Course</b>	<b>(69)</b>	<b>(167)</b>	<b>(98)</b>	<b>0</b>	<b>0</b>	<b>(167)</b>	<b>(98)</b>
Employee Related Expenditure	176	189	13			189	13
Premises Related Expenditure	27	7	(20)			7	(20)
Supplies & Services	32	26	(6)			26	(6)
Transport Related Expenditure	32	23	(9)			23	(9)
Customer & Client Receipts	(337)	(412)	(75)			(412)	(75)
<b>Health &amp; Food Safety</b>	<b>219</b>	<b>185</b>	<b>(34)</b>	<b>0</b>	<b>0</b>	<b>185</b>	<b>(34)</b>
Employee Related Expenditure	139	145	6			145	6
Transport Related Expenditure	1	0	(1)			0	(1)
Supplies & Services	21	16	(6)			16	(6)
Third Party Payments	62	62	0			62	0
Transfer Payments	0	0	0			0	0
Customer & Client Receipts	(5)	(7)	(3)			(7)	(3)
Income - Transfers/Appropriatio	0	0	0			0	0
Other Grants & Reimbursements	0	(31)	(31)			(31)	(31)
<b>Open Spaces</b>	<b>104</b>	<b>105</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>105</b>	<b>1</b>
Premises Related Expenditure	182	193	11			193	11
Transport Related Expenditure	11	6	(5)			6	(5)
Supplies & Services	27	26	(1)			26	(1)
Customer & Client Receipts	(116)	(118)	(1)			(118)	(1)
Government Grants	0	0	0			0	0
Other Grants & Reimbursements	0	(2)	(2)			(2)	(2)

	Budget	Actual outturn	Variance	Earmark Reserves Adjustments Drawdown	Earmark Reserve Adjustment Contribution to	Revised Actual	Variance to CB
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
<b>Delivering An Efficient &amp; Effective Council</b>	5,250	4,814	(435)	(154)	205	4,865	(384)
<b>Commercial Activity</b>	(200)	0	200	0	0	0	200
Customer & Client Receipts	(200)	0	200			0	200
<b>Communications</b>	77	81	4	0	0	81	4
Employee Related Expenditure	100	86	(14)			86	(14)
Transport Related Expenditure	0	0	0			0	0
Supplies & Services	1	21	20			21	20
Third Party Payments	0	0	0			0	0
Customer & Client Receipts	0	(0)	(0)			(0)	(0)
Other Grants & Reimbursements	0	(3)	(3)			(3)	(3)
Recharges - Internal Income	(24)	(23)	1			(23)	1
<b>Corporate Finance</b>	628	562	(67)	0	0	562	(67)
Employee Related Expenditure	611	563	(48)			563	(48)
Transport Related Expenditure	1	0	(1)			0	(1)
Supplies & Services	125	147	21			147	21
Third Party Payments	0	0	0			0	0
Transfer Payments	61	0	(61)			0	(61)
Customer & Client Receipts	0	0	0			0	0
Other Grants & Reimbursements	(31)	(44)	(14)			(44)	(14)
Recharges - Internal Income	(139)	(104)	35			(104)	35
<b>Corporate Fraud</b>	(18)	(20)	(2)	0	0	(20)	(2)
Employee Related Expenditure	64	63	(0)			63	(0)
Supplies & Services	6	7	1			7	1
Third Party Payments	0	0	0			0	0
Recharges - Internal Income	(89)	(91)	(2)			(91)	(2)
<b>Corporate Health &amp; Safety</b>	(6)	4	9	0	0	4	9
Employee Related Expenditure	0	0	0			0	0
Transport Related Expenditure	0	0	0			0	0
Supplies & Services	1	0	(1)			0	(1)
Third Party Payments	7	8	1			8	1
Transfer Payments	0	0	0			0	0
Customer & Client Receipts	0	0	0			0	0
Income - Transfers/Appropriatio	0	0	0			0	0
Other Grants & Reimbursements	0	0	0			0	0
Recharges - Internal Income	(13)	(4)	9			(4)	9

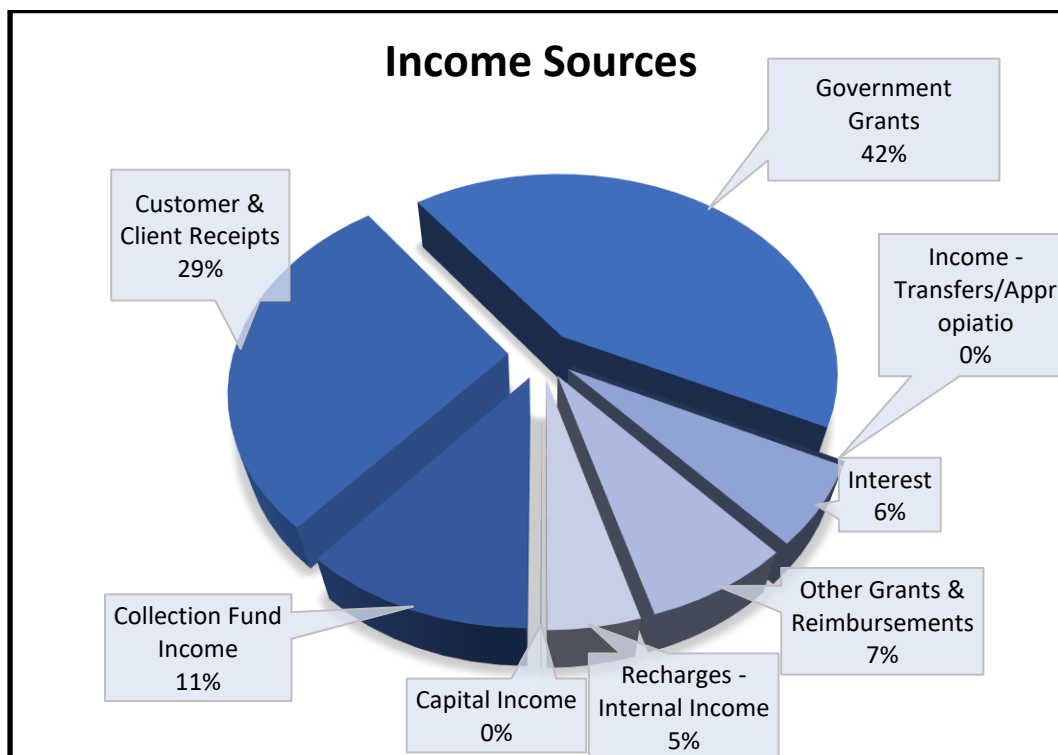
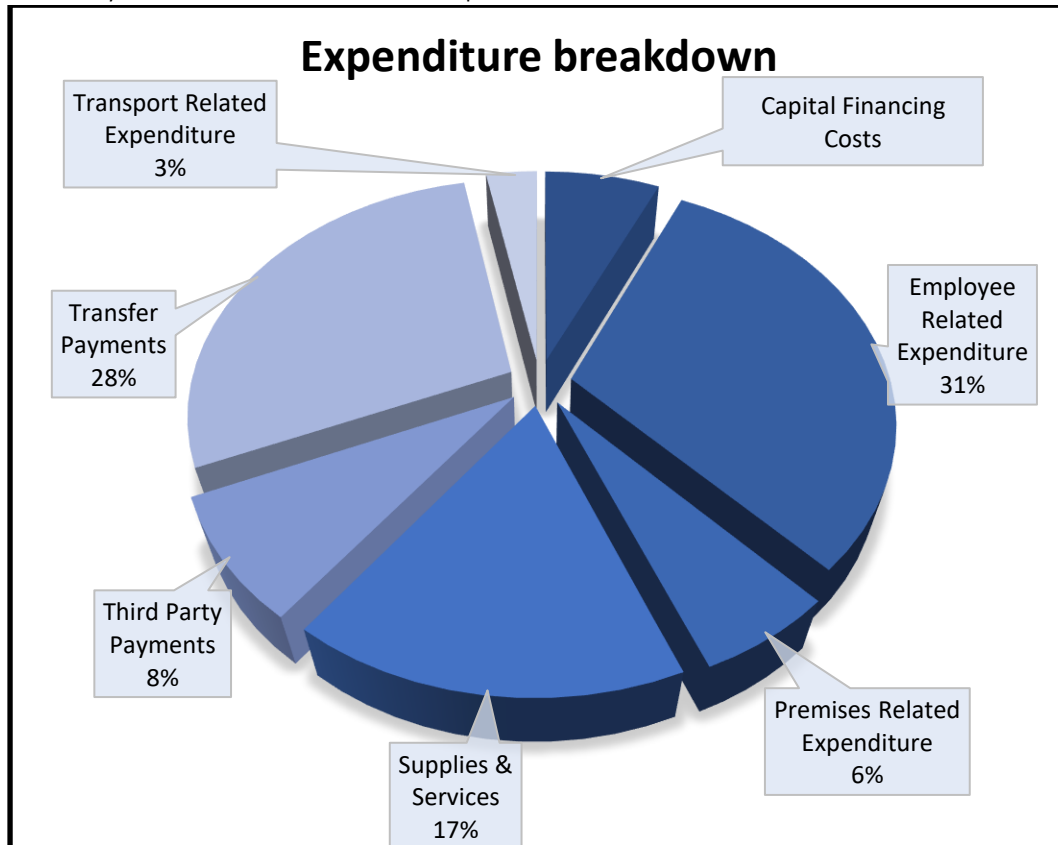
	Budget	Actual outturn	Variance	Earmark Reserves Adjustments Drawdown	Earmark Reserve Adjustment Contribution to	Revised Actual	Variance to CB
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
<b>Corporate Management</b>	<b>(7)</b>	<b>56</b>	<b>63</b>	<b>0</b>	<b>0</b>	<b>56</b>	<b>63</b>
Premises Related Expenditure	0	0	0			0	0
Supplies & Services	192	340	148			340	148
Third Party Payments	13	19	6			19	6
Customer & Client Receipts	0	(101)	(101)			(101)	(101)
Government Grants	0	(27)	(27)			(27)	(27)
Other Grants & Reimbursements	0	(10)	(10)			(10)	(10)
Recharges - Internal Income	(211)	(164)	47			(164)	47
<b>Corporate Support</b>	<b>200</b>	<b>183</b>	<b>(17)</b>	<b>0</b>	<b>0</b>	<b>183</b>	<b>(17)</b>
Employee Related Expenditure	117	97	(20)			97	(20)
Premises Related Expenditure	0	0	0			0	0
Supplies & Services	119	110	(9)			110	(9)
Other Grants & Reimbursements	(6)	(6)	0			(6)	0
Recharges - Internal Income	(31)	(19)	12			(19)	12
<b>Council Tax &amp; Nndr</b>	<b>192</b>	<b>65</b>	<b>(127)</b>	<b>0</b>	<b>167</b>	<b>231</b>	<b>40</b>
Premises Related Expenditure	0	0	0			0	0
Supplies & Services	15	11	(4)			11	(4)
Third Party Payments	685	685	(0)			685	(0)
Transfer Payments	0	0	0			0	0
Customer & Client Receipts	(45)	(10)	35			(10)	35
Government Grants	(106)	(269)	(163)		167	(102)	4
Other Grants & Reimbursements	(358)	(353)	5			(353)	5
<b>Customer &amp; Performance</b>	<b>318</b>	<b>239</b>	<b>(79)</b>	<b>0</b>	<b>0</b>	<b>239</b>	<b>(79)</b>
Employee Related Expenditure	447	394	(53)			394	(53)
Transport Related Expenditure	0	0	0			0	0
Supplies & Services	4	1	(3)			1	(3)
Recharges - Internal Income	(134)	(157)	(23)			(157)	(23)
<b>Democratic Services &amp; Support</b>	<b>298</b>	<b>288</b>	<b>(10)</b>	<b>0</b>	<b>0</b>	<b>288</b>	<b>(10)</b>
Employee Related Expenditure	141	127	(15)			127	(15)
Transport Related Expenditure	2	2	0			2	0
Supplies & Services	324	304	(20)			304	(20)
Customer & Client Receipts	(5)	0	5			0	5
Recharges - Internal Income	(165)	(144)	20			(144)	20
<b>Design And Print Services</b>	<b>53</b>	<b>40</b>	<b>(13)</b>	<b>0</b>	<b>0</b>	<b>40</b>	<b>(13)</b>
Employee Related Expenditure	32	33	1			33	1
Supplies & Services	22	8	(14)			8	(14)
Customer & Client Receipts	0	0	0			0	0
Recharges - Internal Income	(2)	(1)	0			(1)	0



	Budget	Actual outturn	Variance	Earmark Reserves Adjustments Drawdown	Earmark Reserve Adjustment Contribution to	Revised Actual	Variance to CB
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
<b>Digital Servs &amp; Transformation</b>	<b>1,215</b>	<b>1,172</b>	<b>(43)</b>	<b>0</b>	<b>0</b>	<b>1,172</b>	<b>(43)</b>
Employee Related Expenditure	733	618	(114)			618	(114)
Customer & Client Receipts	0	0	0			0	0
Government Grants	0	(3)	(3)			(3)	(3)
Transport Related Expenditure	1	0	(1)			0	(1)
Third Party Payments	0	11	11			11	11
Supplies & Services	715	716	2			716	2
Income - Transfers/Appropriatio	(30)	0	30			0	30
Other Grants & Reimbursements	0	0	0			0	0
Recharges - Internal Income	(204)	(146)	57			(146)	57
Recharges To Hra	0	(25)	(25)			(25)	(25)
<b>Electoral Services</b>	<b>254</b>	<b>307</b>	<b>53</b>	<b>(70)</b>	<b>0</b>	<b>237</b>	<b>(17)</b>
Employee Related Expenditure	218	202	(16)			202	(16)
Transport Related Expenditure	0	0	(0)			0	(0)
Supplies & Services	36	44	8			44	8
Third Party Payments	0	0	0			0	0
Transfer Payments	92	90	(1)			90	(1)
Customer & Client Receipts	0	(2)	(2)			(2)	(2)
Government Grants	(27)	(27)	0			(27)	0
Income - Transfers/Appropriatio	(65)	0	65	(70)		(70)	(5)
Other Grants & Reimbursements	0	0	0			0	0
<b>Emergency Planning</b>	<b>13</b>	<b>1</b>	<b>(12)</b>	<b>0</b>	<b>12</b>	<b>13</b>	<b>0</b>
Employee Related Expenditure	12	0	(12)		12	12	(0)
Supplies & Services	1	1	0			1	0
<b>Executive Board</b>	<b>655</b>	<b>459</b>	<b>(196)</b>	<b>0</b>	<b>0</b>	<b>459</b>	<b>(196)</b>
Employee Related Expenditure	981	876	(105)			876	(105)
Premises Related Expenditure	0	0	0			0	0
Transport Related Expenditure	2	1	(1)			1	(1)
Supplies & Services	67	70	3			70	3
Third Party Payments	106	49	(56)			49	(56)
Transfer Payments	0	0	0			0	0
Income - Transfers/Appropriatio	(28)	0	28			0	28
Other Grants & Reimbursements	(338)	(424)	(86)			(424)	(86)
Recharges - Internal Income	(135)	(115)	20			(115)	20
<b>Hsg Benefit &amp; C.Tax Support</b>	<b>69</b>	<b>124</b>	<b>55</b>	<b>0</b>	<b>0</b>	<b>124</b>	<b>55</b>
Supplies & Services	121	154	33			154	33
Third Party Payments	274	274	(0)			274	(0)
Transfer Payments	9,574	8,786	(788)			8,786	(788)
Customer & Client Receipts	(150)	(45)	105			(45)	105
Government Grants	(9,750)	(9,046)	705			(9,046)	705

	Budget	Actual outturn	Variance	Earmark Reserves Adjustments Drawdown	Earmark Reserve Adjustment Contribution to	Revised Actual	Variance to CB
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
<b>Human Resources</b>	<b>393</b>	<b>238</b>	<b>(156)</b>	<b>0</b>	<b>26</b>	<b>264</b>	<b>(130)</b>
Employee Related Expenditure	335	259	(77)		18	277	(59)
Transport Related Expenditure	0	0	0			0	0
Supplies & Services	49	50	1			50	1
Third Party Payments	20	7	(13)			7	(13)
Transfer Payments	97	0	(97)			0	(97)
Customer & Client Receipts	(18)	(18)	(0)			(18)	(0)
Government Grants	(0)	(8)	(8)		8	0	0
Other Grants & Reimbursements	0	(0)	(0)			(0)	(0)
Recharges - Internal Income	(90)	(51)	39			(51)	39
<b>Internal Audit</b>	<b>84</b>	<b>90</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>90</b>	<b>6</b>
Supplies & Services	0	0	0			0	0
Third Party Payments	90	90	(0)			90	(0)
Recharges - Internal Income	(6)	0	6			0	6
<b>Legal Services &amp; Data Protect</b>	<b>373</b>	<b>457</b>	<b>84</b>	<b>(84)</b>	<b>0</b>	<b>373</b>	<b>(0)</b>
Employee Related Expenditure	28	0	(28)			0	(28)
Supplies & Services	508	500	(7)			500	(7)
Third Party Payments	100	93	(7)			93	(7)
Income - Transfers/Appropriatio	(150)	0	150	(84)		(84)	66
Other Grants & Reimbursements	(34)	(42)	(8)			(42)	(8)
Recharges - Internal Income	(79)	(95)	(16)			(95)	(16)
<b>Office Accommodation</b>	<b>184</b>	<b>(13)</b>	<b>(197)</b>	<b>0</b>	<b>0</b>	<b>(13)</b>	<b>(197)</b>
Employee Related Expenditure	127	146	19			146	19
Premises Related Expenditure	432	296	(136)			296	(136)
Transport Related Expenditure	2	2	(0)			2	(0)
Supplies & Services	58	21	(37)			21	(37)
Third Party Payments	3	1	(1)			1	(1)
Customer & Client Receipts	(354)	(429)	(75)			(429)	(75)
Other Grants & Reimbursements	(8)	(30)	(22)			(30)	(22)
Recharges - Internal Income	(75)	(19)	56			(19)	56
<b>Payroll</b>	<b>35</b>	<b>49</b>	<b>13</b>	<b>0</b>	<b>0</b>	<b>49</b>	<b>13</b>
Transport Related Expenditure	0	1	1			1	1
Supplies & Services	0	(0)	(0)			(0)	(0)
Third Party Payments	50	59	10			59	10
Other Grants & Reimbursements	0	(1)	(1)			(1)	(1)
Recharges - Internal Income	(14)	(11)	3			(11)	3
<b>Procurement</b>	<b>28</b>	<b>24</b>	<b>(4)</b>	<b>0</b>	<b>0</b>	<b>24</b>	<b>(4)</b>
Employee Related Expenditure	49	51	2			51	2
Supplies & Services	6	7	2			7	2
Third Party Payments	0	0	0			0	0
Recharges - Internal Income	(27)	(34)	(7)			(34)	(7)
<b>Revs &amp; Bens Customer Support</b>	<b>411</b>	<b>411</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>411</b>	<b>0</b>
Supplies & Services	0	0	0			0	0
Third Party Payments	411	411	0			411	0

An analysis of the General Funds Expenditure and Income is visualised below:



^ Government grants includes approximately 67% of Housing Benefit Income.

## Housing Revenue Account

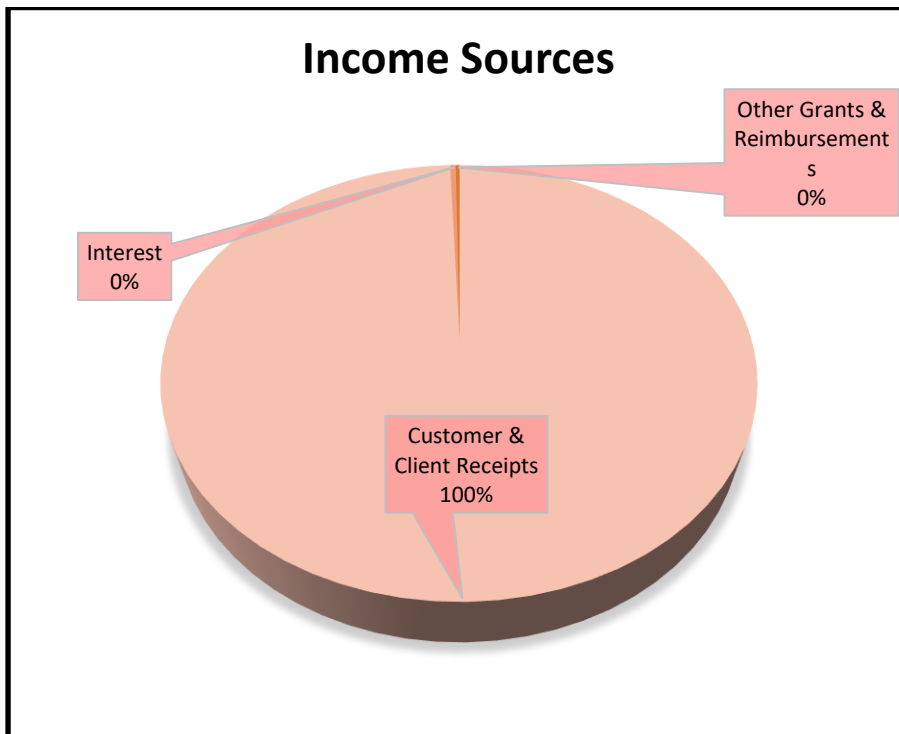
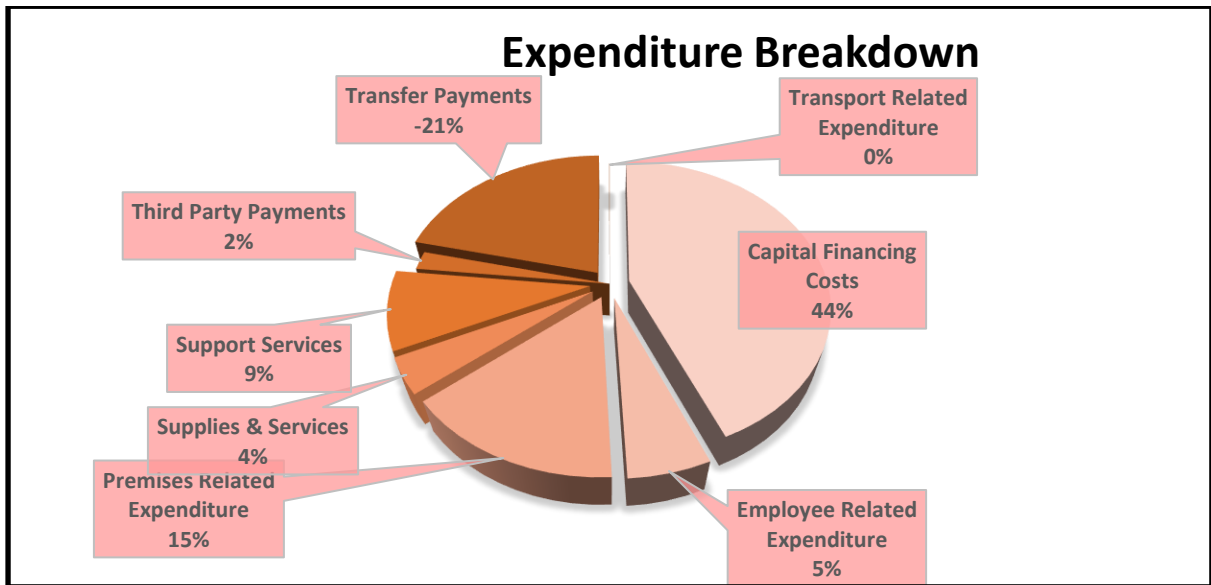
The net expenditure for the year was a surplus of £442k increasing the HRA working balance to a more sustainable level. The table below summarises the HRA outturn position for the year:

	Budget £'000	Outturn £'000	Variance £'000
Repairs & Maintenance	3,008	3,063	55
Supervision & Management	3,911	3,879	(32)
Rents Rates Taxes & Other Charges	134	170	35
Depreciation (major repairs reserve)	2,941	3,124	183
Corporate & Democratic Core	376	308	(68)
<b>Total Expenditure</b>	<b>10,371</b>	<b>10,544</b>	<b>174</b>
Dwelling Rent	(12,197)	(12,205)	(8)
Non-Dwelling Rent	(347)	(265)	82
Charges for Services & Facilities	(906)	(960)	(54)
Contributions to Expenditure	206	(31)	(236)
<b>Total Income</b>	<b>(13,245)</b>	<b>(13,461)</b>	<b>(216)</b>
<b>Net Cost of Services</b>	<b>(2,874)</b>	<b>(2,917)</b>	<b>(43)</b>
Bad Debt Provision	60	156	96
Interest Payable	2,000	2,016	16
Pension Contributions	180	237	57
Investment Income	(50)	(33)	16
Revenue Contribution to Capital	250	0	(250)
Contribution to reserves	0	100	100
<b>Total Non Service Expenditure</b>	<b>2,440</b>	<b>2,475</b>	<b>35</b>
<b>Deficit/(Surplus)</b>	<b>(434)</b>	<b>(442)</b>	<b>(8)</b>
Working Balance bfwd	1,480	1,480	0
Working Balance cfwd	1,914	1,922	8

## HRA subjective variance analysis.

	Budget	Actual outturn	Variance
	£'000	£'000	£'000
<b>Expenditure:</b>	<b>10,371</b>	<b>10,544</b>	<b>174</b>
<b>Repairs and Maintenance</b>	<b>3,008</b>	<b>3,063</b>	<b>55</b>
Premises Related Expenditure	2,739	2,800	61
Transport Related Expenditure	0	0	0
Supplies & Services	249	241	(8)
Third Party Payments	20	21	1
<b>Supervision and Management</b>	<b>3,911</b>	<b>3,879</b>	<b>(32)</b>
Employee Related Expenditure	1,326	1,272	(54)
Premises Related Expenditure	251	307	56
Transport Related Expenditure	8	5	(3)
Supplies & Services	362	565	204
Third Party Payments	418	438	20
Transfer Payments	3	0	(3)
Support Services	1,546	1,330	(216)
Customer & Client Receipts	0	0	0
Other Grants & Reimbursements	(2)	(1)	1
Recharges - Internal Income	0	(37)	(37)
<b>Rent, Rates, Taxes and Other Charges</b>	<b>134</b>	<b>170</b>	<b>35</b>
Premises Related Expenditure	127	161	34
Transport Related Expenditure	5	5	(0)
Supplies & Services	2	3	2
<b>Corporate and Non-Corporate Democratic Core</b>	<b>376</b>	<b>308</b>	<b>(68)</b>
Support Services	376	308	(68)
<b>Depreciation and Impairment</b>	<b>2,941</b>	<b>3,124</b>	<b>183</b>
Capital Financing Costs	2,941	3,124	183
<b>Income:</b>	<b>(18,245)</b>	<b>(13,461)</b>	<b>4,784</b>
<b>Dwelling Income</b>	<b>(12,197)</b>	<b>(12,205)</b>	<b>(8)</b>
Customer & Client Receipts	(12,197)	(12,205)	(8)
<b>Non-Dwelling Income</b>	<b>(347)</b>	<b>(265)</b>	<b>82</b>
Customer & Client Receipts	(347)	(265)	82
<b>Charges for Services and Facilities</b>	<b>(906)</b>	<b>(960)</b>	<b>(54)</b>
Supplies & Services	(60)	(64)	(4)
Customer & Client Receipts	(834)	(894)	(60)
Other Grants & Reimbursements	(12)	(2)	10
<b>Contributions to Expenditure</b>	<b>(4,795)</b>	<b>(31)</b>	<b>4,764</b>
Transfer Payments	(4,792)	0	4,792
Other Grants & Reimbursements	(3)	(31)	(28)
<b>Net (Income) on HRA Services</b>	<b>(7,874)</b>	<b>(2,917)</b>	<b>4,957</b>
<b>HRA Share of Other Operating Income &amp; Expenditure</b>	<b>7,440</b>	<b>2,475</b>	<b>(4,965)</b>
Movement in the Allowance for Bad Debts	60	156	96
Interest Payable and similar charges	2,000	2,016	16
Interest and Investment Interest	(50)	(33)	16
Contribution to Capital Financing	5,250	0	(5,250)
Net Interest on the Net Defined benefit liability	180	237	57
Contribution to reserves	0	100	100
<b>HRA Services (Surplus)</b>	<b>(434)</b>	<b>(442)</b>	<b>(8)</b>

An analysis of the HRA's Expenditure and Income is visualised below:





**BRENTWOOD  
BOROUGH COUNCIL**

Brentwood Borough Council  
Capital & Investment Strategy  
2021/22 Annual Report

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# Capital and Investment Annual Report

## Introduction

2021/22 was the year that the country began a roadmap of lockdown easing following the COVID-19 pandemic. Although the country was no longer imposed to any further lockdowns, capital projects have felt an impact from the pandemic this financial year. There is back log that is affecting all nationally. For the Capital Programme some projects start dates have slipped where contractors try and catch up on projects that have been delayed from the previous year. Resourcing has become an issue

Other external factors such as the UK departing from the European Union and the war in Ukraine have impacted the market which has had an external impact on the ability for the Council to deliver its capital programme. The building market has seen an increase in costs of 16.9% in the 12 months to March 2022, which can make some schemes financially unviable to deliver.

The year did see the successful opening of the new King Georges Pavilion the Pavilion had its official open day in March 2022. The new facilities include a fully accessible pavilion building, which has new changing rooms, toilet and showers, golf club lounge, sensory room, changing places facility, new café, indoor soft play, and TAG active, which is an indoor assault course that can be done as an individual or against friends and family. The Splash Pad and outdoor Adventure Play opened in the Spring of 2022 with the warmer weather.

Finally, the Council completed the build of 3 new affordable homes within the HRA, known as Whittington Mews. These properties have been completed at a former garage site at Barnston Way. Whittington Mews consists of three townhouse style properties. Two of these are fully adaptable with ground floor level entry bathrooms. The internal specification is to a high standard with integrated storage and cycle provision and air source heat pumps. Each dwelling has onsite parking provision with electric vehicle charging and landscaping.

## Capital Program Outturn

	2020/21 £'000	Actual £'000	Variance £'000
<b><u>Protecting Our Environment</u></b>			
Vehicle Replacement Programme	1,544	718	(826)
Low Emissions Infrastructure	138	0	(138)
Cemetery Headstones	8	0	(8)
Open Spaces Infrastructure	100	97	(3)
Cemetery Infrastructure	50	6	(44)
Car Park Improvements	193	0	(193)
<b>Total Protecting Our Environment</b>	<b>2,033</b>	<b>821</b>	<b>(1,212)</b>
<b><u>Developing Our Communities</u></b>			
Brentwood Leisure Centre	250	0	(250)
Community Halls	122	24	(98)
Play Area Refurbishments	948	811	(137)
Open Spaces – Car Parks	149	0	(149)
King Georges Redevelopment	6,769	6,261	(508)
Football Hub	791	59	(732)
Section 106 programs	95	95	0
<b>Total Developing Our Communities</b>	<b>9,124</b>	<b>7,250</b>	<b>(1,874)</b>
<b><u>Improving Housing</u></b>			
Home Repair Assistance Grant	5	0	(5)
Disabled Facilities Grant	250	342	92
HRA Decent Home Programme	7,528	4,430	(3,098)
Affordable Housing Development	8,585	1,846	(6,739)
<b>Total Improving Housing</b>	<b>16,368</b>	<b>6,618</b>	<b>(9,750)</b>
<b><u>Delivering an Effective and Efficient Council</u></b>			
ICT Strategy	55	26	(29)
ICT Hardware	44	30	(14)
ICT Licences	36	17	(19)
Printing Equipment	9	11	2
Strategic Acquisitions	4,650	0	(4,650)
Asset Management	629	406	(223)
Asset Development	288	183	(105)
Financial System Infrastructure	70	19	(51)
<b>Total Delivering an Effective and Efficient Council</b>	<b>5,781</b>	<b>701</b>	<b>(5,080)</b>
<b>Total Capital Programme</b>	<b>33,306</b>	<b>15,390</b>	<b>(17,916)</b>

Capital Program for 2021/22 has been financed by the following:

	2020/21 £'000	Actual £'000	Variance £'000
Total General Capital Programme	17,193	9,114	(8,079)
Total HRA Capital Programme	16,113	6,276	(9,837)
<b>Total Capital Programme</b>	<b>33,306</b>	<b>15,390</b>	<b>(17,916)</b>
Funded By:			
General Fund Capital Receipts	200	147	53
Government Grants	297	342	(45)
Other Government Grants	95	95	0
Borrowing	16,601	8,530	(8,030)
<b>Total General Fund Capital Funding</b>	<b>17,193</b>	<b>9,114</b>	<b>(8,038)</b>
HRA Capital Receipts	2,230	1,069	(1,162)
Major Repairs Reserve	7,528	4,430	(3,098)
HRA Borrowing	6,355	777	(5,578)
<b>Total HRA Capital Funding</b>	<b>16,113</b>	<b>6,276</b>	<b>(9,837)</b>

## 2021/22 Slippage

Scheme	£'000
Vehicle Fleet Management	826
Cemetery Headstones	8
Low Emissions Infrastructure	138
Cemetery Infrastructure	44
<b>Total Protecting Our Environment</b>	<b>1,016</b>
KGPF Development	508
Football Hub Development	732
Community Halls	98
Leisure Facilities	250
<b>Total Developing Our Communities</b>	<b>1,588</b>
Strategic Housing Development programme - Regeneration	6,739
HRA Decent Homes Programme – Capital Maintenance	3,098
<b>Total Improving Housing</b>	<b>9,837</b>
Asset Management Strategy	223
Asset Development	105
Strategic Acquisitions	4,650
Financial System Infrastructure	51
ICT Strategy	29
ICT Hardware	14
ICT Licences	19
<b>Total Delivering an Effective and Efficient Council</b>	<b>5,091</b>
<b>Total Capital Programme</b>	<b>17,532</b>
<b>Financed By</b>	
HRA Capital Receipts	(2,696)
HRA Borrowing	(7,142)
GF Borrowing	(7,694)
<b>Total Capital Funding</b>	<b>(17,532)</b>

### Slippage Requests

The following slippage requests have been requested by services and reviewed by the section 151 Officer. Slippage does not exceed what has previously been approved for specific projects by Ordinary Council.

The reason required for the slippage is detailed below:

Vehicle Fleet Management – Delays in obtaining vehicles in the current market conditions has resulted in vehicle lead times taking longer than expected. Therefore, the slippage is to finance the vehicles that have been purchased but are still awaiting delivery.

Cemetery Headstones – Works had slipped in to 22/23 due to resourcing issues. Very few improvements made in 21/22, so work will take place in 22/23.

Low Emissions Infrastructure – Financial contribution to Essex County Council to support their active travel plans. County have not requested the funding and therefore slippage is required to ensure we can financially commit to this scheme.

Cemetery Infrastructure – Works had slipped in to 22/23 due to resourcing issues. Very few improvements made in 21/22, so work will take place in 22/23.

KGPF Development – The Pavilion was opened and completed this financial year however financial resource is still required to complete the whole site with landscaping and enhancements to the car parking.

Football Hub Development – Ongoing discussions continue with the Football Foundation to determine the appropriate operating model for the site, once the operating model is resolved the project can progress.

Community Halls – To fund a new boiler and heating system at Hutton poplars Hall. Delays were caused by assessments of the best action to take.

Leisure Facilities – To support improvement works at the Brentwood leisure centre such as the roof. It was not possible to get this completed in 21/22 due to resources, assessments of what was needed and contracting a provider.

Strategic Housing Development Programme – Brookfield Close continues to progress and the conversion of Crescent Road commenced this financial year. The project budgets need realigning to cashflow needs and revised profiling of the programme over the 5-7 year period will be presented during 2022/23.

HRA Decent Homes Programme – The HRA Decent Homes programme as primarily been focused on compliance regarding the housing stock. Projects regarding communal heating commenced in 2021/22 however will not be completed until the following financial year. Delays in specification sign off due to the complexity of balcony renewals and fire risk works resulted in the programme not commencing until the new financial year (2022/23).

Asset Management Strategy – Funds had already been committed for compliance improvements, however works had slipped in to 22/23. Delays have been caused by resourcing issues.

Asset Development – To fund ongoing to developments to Kind Edwards property. Additionally, to support development in the borough.

Strategic Acquisitions – Ensuring the Council has funding available to purchase sites within the borough for the benefit of the borough.

Financial System Infrastructure – Due to external contractors not being able to resource the consultancy support required to upgrade the financial system, the upgrade has been rescheduled to the following financial year.

ICT Strategy – The ICT Strategy, Hardware and Licence slippage will be combined into one total. The delay transpires around deciding on how the organisation should work following the restrictions being eased from the pandemic. There is now an organisation wide project to

support new ways of working as we now live with Covid. the Slippage will support in delivering the technology so the organisation can work agile.

## Treasury Management 2021/22

### Review of Activities during 2021/22

The year saw the replacement of maturing short-term borrowings with long term PWLB borrowings. The rationale for this switch was to take advantage of the fixed interest rates at historically low levels. This approach will add certainty to the Council's medium term financial strategy and will reduce the risk of maturing short-term borrowing needing to be refinanced at higher interest rates.

Short-term borrowing reduced from £129.5m at the start of the year to £36m at the end of the year, with a corresponding increase in long-term borrowing during the year from £103m to £192m.

Average interest rates during the year were 0.15% for short term borrowings, 1.99% for long-term general fund borrowings and 3.21% for long-term HRA borrowings.

During the year the Council entered into two deferred loan agreements with a market lender, Phoenix Life. Under these agreements, the Council will draw down £25m in August 2023, and a further £20m in June 2024. Both loans are repayable over 40 years at competitive interest rates. Arranging these loans in advance has secured finance for the Council's future capital programme in future years.

There was a modest amount of low-risk investment activity during the year. This involved placing funds in call accounts or in short-term fixed rate investments with UK banks, and with the Debt Management Agency Deposit Facility provided by HM Treasury. The investment balance at the end of the year was £11m, and interest earnings for the year were £0.041m, representing an average rate of return of 0.30%.

The Corporate Director - Finance & Resources confirms that all treasury activity during the year was in accordance with the Treasury Management Strategy for 2021/22:

### Prudential and Treasury Indicators.

The following tables set out the Prudential and Treasury Indicators for 2021/22. They show the outturn position for the year, compared to the outturn position for the previous year and the estimate for 2021/22.

### Capital expenditure and financing.

The first two tables show the capital expenditure for 2021/22 and how this was financed.

	2020/21 outturn	2021/22 Estimate	2021/22 outturn
	£000	£000	£000
General Fund	121,441	11,140	9,114
HRA	4,396	8,993	6,276
<b>Sub total</b>	<b>125,837</b>	<b>20,133</b>	<b>15,390</b>

	2020/21 outturn	2021/22 Estimate	2021/22 outturn
	£000	£000	£000
Capital receipts	(668)	(400)	(1,214)
Capital grants & contributions	(226)	(250)	(437)
Revenue contributions	(500)	0	0
Major repairs reserve	(2,820)	(6,408)	(4,430)
Internal borrowing	0	0	0
External Borrowing	(121,623)	(13,075)	(9,309)
<b>Total Financing</b>	<b>(125,837)</b>	<b>(20,133)</b>	<b>(15,390)</b>

Capital Financing Requirement (CFR) The CFR is the Council's underlying need to borrow to finance capital expenditure is termed the Capital Financing Requirement (CFR).

	2020/21 outturn	2021/22 Estimate	2021/22 outturn
	£000	£000	£000
<b>Total CFR</b>	<b>240,596</b>	<b>250,503</b>	<b>248,715</b>
Gross borrowing position	232,844	233,343	228,019
<b>Under funding of CFR</b>	<b>7,752</b>	<b>17,160</b>	<b>20,696</b>

To ensure that borrowing levels are prudent over the medium term, the Council should ensure that its gross external borrowing does not, except in the short term, exceed the total

of the capital financing requirement in the preceding year plus the estimates of any additional capital financing requirement for the current and next two financial years. The Council has complied with this prudential indicator as the gross borrowing position is lower than the CFR.

The Operational Boundary.

This is the level above which borrowing is not expected to rise (occasions where the actual position is either below or over the boundary are acceptable subject to the authorised limit not being breached).

The Authorised Limit.

This is the “affordable borrowing limit” required by Section 3 of the Local Government Act 2003. This represents a limit beyond which external debt is prohibited. The table below demonstrates that during 2021/22 the Council maintained gross borrowing within this limit.

	2020/21 outturn £000	2021/22 Estimate £000	2021/22 outturn £000
Gross debt	232,844	233,343	228,019
Operational Boundary	229,534	245,000	245,000
Authorised Limit	247,500	293,000	293,000

Actual financing costs as a proportion of net revenue stream.

This indicator identifies the trend in the cost of capital (borrowing and other long-term obligation costs net of investment income) against the net revenue stream.

	2020/21 outturn	2021/22 Estimate	2021/22 outturn
General Fund	9%	42%	35%
HRA	16%	15%	16%
Commercial activities	-11%	-23%	-13%



#### Maturity Structure of the fixed rate borrowing portfolio.

The Council sets target upper limits for borrowings that has the same maturity structure in order to minimise its exposure to large amounts of borrowing needing to be refinanced in the same year, potentially at higher interest rates. These are shown in the following table:

	31 March 2021 £000	Proportion of total borrowing	Target upper limit	31 March 2022 £000	Proportion of total borrowing	Target upper limit
> 1 year	129,500	56%	50%	36,000	16%	50%
1-2 years	0	0%	50%	0	0%	50%
2-5 years	0	0%	50%	0	0%	50%
6-10 years	20,400	9%	50%	27,400	12%	50%
10+ years	82,944	36%	100%	164,796	72%	100%
<b>Total</b>	<b>232,844</b>	<b>100%</b>		<b>228,196</b>	<b>100%</b>	

#### Exposure to Fixed and Variable Rates.

The Council was not exposed to changes in variable interest rates during as all its borrowings were at fixed interest rates. This continues to be the policy in 2021/22.

#### Credit Risk Exposure.

Credit risk was mitigated during 2021/22 by restricting investments to short term investments and short-term deposits with UK banks and with the Debt Management Agency Deposit Facility.

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<b>Committee(s):</b> Policy Resources and Economic Development Committee	<b>Date:</b> 13 <sup>th</sup> July 2022
<b>Subject:</b> Budget Guidelines & Financial Forecasts 2023/24	<b>Wards Affected:</b>
<b>Report of:</b> Jacqueline Vanmellaerts Corporate Director (Finance & Resources)	<b>Public</b>
<b>Report Author/s:</b> Name: Phoebe Barnes Corporate Finance Manager Telephone: 01277 312500 E-mail: phoebe.barnes@brentwood.gov.uk	<b>For Information</b>

## Summary

The report sets out the proposed budget timetable and guidelines that will be followed to develop the budget for 2023/24 and the financial forecast for 2024/25 to 2026/27.

A 10-year financial forecast is included to assist Members in understanding the longer-term financial trajectory of the Council and to identify actions that can be taken to address the continuing deficit of resources over expenditure. These actions will assist Members in having to take decisions at future committees to address future deficit forecasts..

The 10 year forecast includes various static assumptions and includes the use of earmarked reserves to maintain working balances above the minimum required level until 2030/31.

## Main Report

### **Introduction and Background**

1. The Medium-Term Financial Strategy (MTFS) approved for 2022/23 outlined the budget deficits facing the council with a do nothing approach.
2. With the financial impact of the Covid-19 pandemic there is a continued need to generate efficiencies to meet the increasing budget deficits of service delivery and continue to deliver on the Council's aspirations as outlined in the Corporate Strategy.
3. Members were sent communication on 20<sup>th</sup> May, (attached in Appendix C) from the Section 151 Officer highlighting the ongoing financial challenges, not only for Brentwood Council's finances but also potential challenges for the Council's residents regarding the year ahead.
4. Local government finance continues to experience external pressures and uncertainties. There continues to be an absence of reliable forecasting data beyond 2022/23 and proposed changes to the way government funds local government (covered by the Fair Funding Review) have been delayed. In addition, there has been restrictions associated with borrowing from the public works loan

board PWLB. Currently the UK economy reacting to external factors impacting on all of society. Currently at the time of writing this report the UK base rate has increased to 1.25%, CPI (Consumer price index) has reached 9.1% and is expected to climb further with added pressures of utility costs set to rise by 40%.

5. This report sets out the current assumptions assumed within the financial forecasting for the Councils Budget setting Cycle for 2023/24. Appendix A provides a 10-year financial forecast based on high level current assumptions to date. Alongside the budget guidelines as outlined in Appendix B to be issued to officers. These guidelines will be used to prepare draft budgets that will be presented to committee in February 2023 for approval to Ordinary Council.

## **Issue, Options and Analysis of Options**

### **COVID-19**

6. There is a lasting financial effect to the Council’s financial position that is still to be quantified. The revised 10-year MTFS forecast included in Appendix A reflects current assumptions in respect of COVID-19 as for 2022/23 the income budgets affected by the pandemic were reduced.
7. For Brentwood, we are assuming an approx. decrease of £960k across various income streams such as trade waste income, season ticket income, car parking income and licensing income. The situation currently is extremely fluid and is being monitored on an ongoing basis.

### **Interest Payable**

8. At the time of setting the MTFS current PWLB interest rates were assumed.

2022/23	2023/24	2024/25+
1.9%	2.0%	2.0%

9. In response to the external factors world-wide, rates have increased. For budget purposes the interest payable forecasts have been recalculated using the following rates as guided by our Treasury Management Advisors. This will add additional pressure to the MTFS for current borrowing proposals.

2022/23	2023/24	2024/25+
3.4%	3.0%	3.0%

## **Saving Initiatives**

10. The Savings initiatives built within the MTFS are set out in the table below. The current MTFS forecast assumes that these will all be achieved. However, they are RAG rated to highlight the initiatives that are at risk of not being achieved. These initiatives are monitored through the Council's budget monitoring process. Any of these initiatives that were not accomplished would add further pressure to the MTFS.

	2022/23	2023/24	2024/25
<b>Proposed Saving Targets</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>
Corporate Vacancy Factor	(459)	(470)	(479)
Capitalisation Staff Costs *	(50)	(50)	(50)
Digital Efficiencies*	(30)	(30)	(30)
Vehicle Fleet Maintenance	(135)	(135)	(135)
<b>Total Efficiency Targets</b>	<b>(674)</b>	<b>(685)</b>	<b>(694)</b>
Waste Service Income	(365)	(365)	(365)
Leisure Strategy Income	(175)	(175)	(175)
Service Income Generation	(130)	(135)	(136)
<b>Total Income Generation Targets</b>	<b>(670)</b>	<b>(675)</b>	<b>(676)</b>
<b>Total Saving Targets</b>	<b>(1,344)</b>	<b>(1,360)</b>	<b>(1,370)</b>

\*Previously in part incorporated within the 2022/23 base budget

11. The proposed Savings Targets highlighted amber is due to the projects associated in delivering these savings are not yet completed therefore, there is a higher risk that the target may not be achieved.

## **Vacancy Factor**

12. A vacancy factor of 4% is applied to employee costs. This encourages management of appointments to vacant positions to generate efficiencies. It is recognised that not every budget manager will be able to generate these savings. Senior managers are expected to work collectively to achieve this efficiency across the organisation.

13. For 2021/22 the vacancy factor was 7.93% for the General Fund and 7.03% within the HRA establishment. Current market conditions are demonstrating the struggle local government is facing in recruiting permanent positions. Options are to leave posts vacant or to use agency cover as an interim. Services will be reviewed and long term vacant posts reviewed to determine, whether they are needed, whether the budget can be utilised elsewhere or if the budget is required to do something different to deliver an improved service.

## **Regional and Local Pay Award**

14. The MTFs continues to assume a 2% pay award per annum. For information purposes the below table tracks the pay award awarded by the Council compared to the NJC pay awards.

Year	Brentwood Pay Award	NJC Pay award	Difference
2015/16	2.2%	2.2%	0%
2016/17	0%	1%	1%
2017/18	0%	1%	1%
2018/19	1%	2%	1%
2019/20	2%	2%	0%
2020/21	2%	2.75%	0.75%
2021/22+	2%	1.75%	(0.25%)
2022/23*	TBC	TBC	TBC

\* Subject to approval; + NJC 2.75% SCP1

15. There is a fine balance of managing costs of the pay award and ensuring that the Council's pay remains competitive with neighbouring authorities enabling the ability to retain staff and recruit individuals to the right level in the organisation.

16. Although the Council currently sets local pay awards, we have a statutory duty to apply the National Living Wage (NLW) increase to the lower end of our pay scales. Local Pay Commission (LPC) forecasts that the NLW is expected to increase to £10.70 by 2024 (currently £9.50 from April 2022). Therefore, our budgeted future 2% increases already included within the MTFs will not be enough to meet the statutory requirements to reach the predicted levels. The chancellor is expected to announce the 2023/24 NLW in the autumn spending review.

17. Work has commenced on what higher pay awards would look like on the Councils MTFs for 2022/23 if additional pay awards were to be applied in that year only, and the subsequent implications on the future years of 2% increases. The table below is for information and is subject to review and refinement to deliver on an appropriate strategy.

<b>Additional pressure on budget</b>				
	2022/23	2023/24	2024/25	2025/26
Current 2% (Forecast in MTFS)	220,550	229,857	234,454	239,143
Additional 1% (3% total)	335,478	232,156	236,799	241,535
Additional 2% (4% total)	450,407	234,454	239,143	243,926
Additional 3% (5% total)	567,634	236,799	241,535	246,365

### **Inflation and Fees & Charges**

18. Where there are contractual obligations that costs are reviewed in line with specific increases these are reflected within the budget within inflation. Inflation has been applied based on the Treasury's forecast as below.

2023/24	2024/25	2025/26	2026/27+
10.0%	6.0%	2.0%	2.0%

19. Fees and charges are expected to rise in line with inflation. However due to the current cost of living crisis, fees and charges setting for 2023/24 are expected to be reviewed to ensure they are not putting financial burdens on the resident of the Borough whilst balancing the increase cost of delivering the services. Officers are expected to ensure that fees and charges are on a cost recovery basis unless determined by statute.

### **Council Tax**

20. The revised MTFS will assume a Council Tax Increase from 2023/24 or 2% per annum. It is then members decision whether to change this assumption when setting the budget.

21. The Council tax base is assumed will grow by 0.5% per annum, however an annual reconciliation process is carried out and the Council Tax base is realigned to actual levels each year. Ongoing modelling work is currently being carried out by officers in order to take account of future economic changes.

## **General Fund 10-year Forecast**

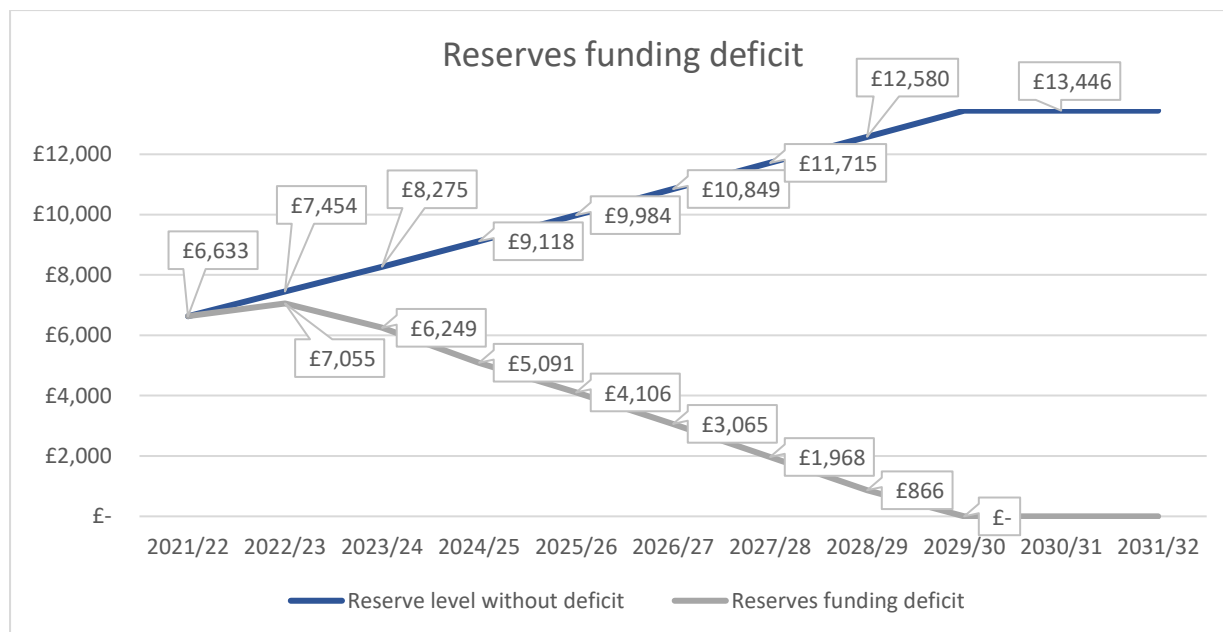
22. Attached in Appendix A is a high level 10-year financial forecast for the General Fund that accounts for all the assumptions outlined above to arrive at the figures presented.
23. In addition to the assumptions outlined, the figures assume the level of government-controlled funding sources will continue as per recent years.
24. Local Pay & Council Tax increases have been included within the Total General Fund Net Expenditure and Total Funding, while additional forecasted adjustments have been itemised separately.
25. Useable earmarked reserves (Total of Service and Mitigation reserves balances as at March 2022 are £6,633k) have been utilised to mitigate projected future deficits.
26. The table indicates there is a continued commitment within the MTFS to contribute regeneration income to earmarked reserve balances of £878k. However, even with this contribution earmarked reserves will be fully depleted by 2029/30 and working balances will fall below minimum levels by 2030/31.
27. Any one of these assumptions may prove to be incorrect but they provide a basis on which to plan for the future in a very uncertain climate. The Council needs to continue to transform the way that it delivers services for the foreseeable future to ensure financial sustainability and reduce future projected deficits.
28. The Council has an ambitious significant investment and regeneration aspiration across the borough. To deliver the planned pipeline of projects, the Council will be required to borrow to finance these projects. Therefore, the Council needs to ensure that its revenue budget can afford the capital financing costs associated to these projects whilst managing future projected deficits.
29. The 10 year forecast is a 'do nothing' approach based on the known assumptions to date included within it.

## **Reserves**

30. The graph below shows the utilisation of mitigation and service earmarked reserves balances only and assumes future projected deficits will reduce the balances to zero by 2029/30, if future projected deficits cannot be mitigated.



31. While the graph below highlights the Council has an appropriate level of mitigation and Service Earmarked Reserves that could be used to reduce future projected deficits in the short term, they can only be utilised once and do not address the underlying deficit within the budget for operating the services. However it is expected that reserves will be utilised in the interim until Central Government deliver more certainty on the future of Local Government Finance.



### **Addressing the Budget Deficit**

32. The strategy for managing the future budget gaps will be developed during the budget setting process. It is expected that it will include elements such as:

- Service redesign and delivery of service strategies
- Maximising income generating opportunities.
- Shared services with other local authorities.
- Ensuring full cost recovery for services.
- Reviewing how services are delivered to reduce costs.
- Reduce off payroll salary costs where appropriate.
- Reviewing and rationalising Council Assets
- Generating new ideas for delivering efficiencies

### **Housing Revenue account**

33. The budget guidelines outlined in Appendix B are applicable to the HRA. A 30-year forecast for the HRA is produced annually. The current version was presented to Ordinary Council as part of the Budget.

34. Officers are currently working on revising the 30 year business plan to take account of the following factors:

- CPI forecasts higher than the current base
- Rent Increase proposals – (not in line with CPI plus 1%)
- Inflation to the Axis contract
- Retro-fitting on existing stock
- Utility Costs

### **Consultation**

35. The assumptions and 10-year Forecast have been presented to the Senior Leadership Team.

### **References to Corporate Plan**

36. The budget underpins the ability to be able to deliver the aspirations outline within the Corporate Strategy by managing our finances and contracts robustly to ensure best value for money.

### **Implications**

#### **Financial Implications**

**Name/Title: Jacqueline Van Mellaerts, Corporate Director (Finance & Resources)**

**Tel/Email: 01277 312500/jacqueline.vanmellaerts@brentwood.gov.uk**

37. Financial implications have been included within the main body of the report.

#### **Legal Implications**

**Name & Title: Amanda Julian, Corporate Director (Law & Governance) and Monitoring Officer**

**Tel & Email: 01277 3127500/amanda.julian@brentwood.gov.uk**

38. There are no direct legal implications arising from this report.

#### **Economic Implications**

**Name/Title: Phil Drane, Corporate Director (Planning and Economy)**

**Tel/Email: 01277 312500/philip.drane@brentwood.gov.uk**

39. Growing our economy is a corporate priority. Therefore, everything the Council does contributes or impacts the borough's economy in some way, either directly or indirectly. It is important that the Council maintains a budget that considers such

implications. In this case, it is important to look ahead and cast a 10-year financial forecast that includes consideration of the economy over time in line with corporate priorities.

**Other Implications** (where significant) – i.e. Health and Safety, Asset Management, Risk Management, Section 17 – Crime & Disorder, Sustainability, ICT.

36. Risk Management – Included within the Strategic Risk Register - Failure to ensure that the net expenditure is contained within the approved budget will result in significant deterioration in the Council's overall financial position and fall below minimum level of reserves.

### **Background Papers**

Medium Term Financial Strategy 2022/23

### **Appendices to this report**

Appendix A: 10-Year Financial Forecast

Appendix B: 2023/24 Budget Setting Guidelines

Appendix C: Memo to Councillors – 20<sup>th</sup> May 2022

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**General Fund 10 Year Forecast**

	<u>2020/21</u>	<u>2021/22</u>	<u>2022/23</u>	<u>2023/24</u>	<u>2024/25</u>	<u>2025/26</u>	<u>2026/27</u>	<u>2027/28</u>	<u>2028/29</u>	<u>2029/30</u>	<u>2030/31</u>	<u>2031/32</u>	<u>10 year</u> <u>Cummulative</u> <u>£'000</u>
	<u>£'000</u>	<u>£'000</u>	<u>£'000</u>	<u>£'000</u>	<u>£'000</u>	<u>£'000</u>	<u>£'000</u>	<u>£'000</u>	<u>£'000</u>	<u>£'000</u>	<u>£'000</u>	<u>£'000</u>	
Total General Fund Net Expenditure	12,063	9,148	9,147	9,881	10,473	10,705	10,941	11,183	11,429	11,680	11,936	12,197	109,571
Total Funding	(11,820)	(9,148)	(9,025)	(8,477)	(8,647)	(8,821)	(8,999)	(9,181)	(9,369)	(9,561)	(9,757)	(9,959)	(91,795)
<b>Deficit/(Surplus)</b>	<b>243</b>	<b>0</b>	<b>122</b>	<b>1,404</b>	<b>1,826</b>	<b>1,884</b>	<b>1,943</b>	<b>2,001</b>	<b>2,060</b>	<b>2,119</b>	<b>2,178</b>	<b>2,238</b>	<b>17,776</b>
<b>Adjustments</b>													
Energy Inflation			214	218	223	227	232	237	241	246	251	256	2,346
All other inflation			228	281	315	321	327	333	340	347	354	361	3,206
Inflation income						(155)	(158)	(161)	(164)	(168)	(171)	(174)	(1,152)
Joint partnership savings			(166)	(255)	(341)	(427)	(437)	(447)	(457)	(467)	(477)	(487)	(3,957)
No Contribution to Earmarked Reserves										(878)	(878)	(878)	(2,634)
<b>Revised Deficit /(Surplus)</b>	<b>243</b>	<b>0</b>	<b>399</b>	<b>1,649</b>	<b>2,023</b>	<b>1,851</b>	<b>1,907</b>	<b>1,963</b>	<b>2,020</b>	<b>1,200</b>	<b>1,257</b>	<b>1,316</b>	<b>15,584</b>
<b>Use of Useable Earmarked Reserves</b>			(399)	(1,649)	(2,023)	(1,851)	(1,907)	(1,963)	(1,968)	(866)	0	0	(12,625)
<b>Net contribution to Reserves included in General Fund Net Expenditure</b>	688	2,951	821	843	866	866	866	866	866	0	0	0	5,992
<b>Total Useable Earmarked Reserve balance</b>	3,682	6,633	7,055	6,249	5,091	4,106	3,065	1,968	866	0	0	0	28,401
<b>Working Balance Bfwd</b>	3,117	2,874	2,874	2,874	2,874	2,874	2,874	2,874	2,874	2,822	2,487	1,230	
<b>Working Balance Cfd</b>	2,874	2,874	2,874	2,874	2,874	2,874	2,874	2,874	2,822	2,487	1,230	(86)	
<b>Difference</b>	<b>0</b>	<b>0</b>	<b>277</b>	<b>245</b>	<b>197</b>	<b>(34)</b>	<b>(36)</b>	<b>(38)</b>	<b>(40)</b>	<b>(920)</b>	<b>(921)</b>	<b>(922)</b>	<b>(2,191)</b>

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**BRENTWOOD  
BOROUGH COUNCIL**

Brentwood Borough Council  
Guidelines for Budget Setting  
2023/24

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## Medium Term Financial Strategy (MTFS)

These guidelines apply to the General Fund, Housing Revenue Account, and the Capital Programme.

### General Fund

The Council's General Fund budget for 2022/23 through to 2024/25 was approved by Ordinary Council on 23<sup>rd</sup> February 2022. The General Fund Working Balances and projected budgets deficits were agreed as detailed below:

	2022/23 Budget £'000	2023/24 Budget £'000	2024/25 Budget £'000
Total General Fund Net Expenditure	9,147	9,881	10,473
Total Funding	(9,025)	(8,477)	(8,647)
Deficit/(Surplus)	122	1,404	1,826
Use of Earmarked Reserves	(122)	0	0
Deficit/(Surplus)	0	1,404	1,826
Working Balance b/fwd	2,874	2,874	1,470
(Deficit)/Surplus	0	(1,404)	(1,826)
Working Balance c/fwd	2,874	1,470	(356)

Included in the table below are the current saving targets built within the General Fund budget for 2022/23 and future years:

	2022/23	2023/24	2024/25
Proposed Saving Targets	£'000	£'000	£'000
Corporate Vacancy Factor	(459)	(470)	(479)
Capitalisation Staff Costs *	(50)	(50)	(50)
Digital Efficiencies*	(30)	(30)	(30)
Vehicle Fleet Maintenance	(135)	(135)	(135)
<b>Total Efficiency Targets</b>	<b>(674)</b>	<b>(685)</b>	<b>(694)</b>
Waste Service Income	(365)	(365)	(365)
Leisure Strategy Income	(175)	(175)	(175)
Service Income Generation	(130)	(135)	(136)
<b>Total Income Generation Targets</b>	<b>(670)</b>	<b>(675)</b>	<b>(676)</b>
<b>Total Saving Targets</b>	<b>(1,344)</b>	<b>(1,360)</b>	<b>(1,370)</b>

\*Previously in part incorporated within the 2021/22 base budget.

The budget approach for the General Fund will be focused on how the Council will deliver a balanced budget; the overall aim of the Council is to be financially self-sufficient and resilient over the term of the MTFs; whilst maintaining high standards of services to the general public.

The ability of the council to deliver a balanced or surplus budget given ongoing uncertainties will be a challenge for 2023/24. Key challenges and approaches have been highlighted below.

#### *Central Government funding*

Continues to reduce over time and now focuses on ring fenced funding to deliver central government initiatives. Therefore, the Council needs to identify ways to replace this funding to continue to support the costs of current services. This will include identifying ways of generating sustainable income from assets, services, and business interests, to support service delivery in the long term.

#### *Ongoing impact of COVID-19*

There is continued uncertainty over the financial impact of the pandemic on the Council. The budget strategy will be prepared on the basis of business adjusted by the current known impacts of COVID-19, with anticipated longer-term impacts being reviewed.

### *Service Changes*

Alternative service delivery proposals will continue to be part of the budget strategy process to fulfil continuous improvement and provide value for money, without adversely affecting services received by residents.

### *Regional and Local Pay*

Brentwood Council is not part of the National Joint Committee (NJC) which sets regional local government pay and can currently make local decisions, we have a statutory duty to apply the NLW increase to the lower end of our pay scales. This in turn causes added pressures throughout, ensuring they remain competitive and appropriate.

Using the Local Pay Commission (LPC) forecasts the NLW is expected to increase to £10.70 by 2024 (currently £9.50 from 1st April 2022) and recently the Local Government Association (LGA) have advised that our budgeted future 2% pay awards will not be enough to meet the statutory requirements. We continue to work on capturing the future pressures that may arise and deliver on an appropriate strategy for future Pay.

### *Rochford/Brentwood Partnership*

The Council entered into a shared Partnership with Rochford District Council on 26<sup>th</sup> January 2022. This partnership initially shares a Chief Executive and Senior Management Team. The Partnership will develop over the next 3 years to look at individual services and develop individual business cases to improve service delivery and deliver savings.

### *Inflation and Cost of Living*

At the time of writing the economic outlook for the UK is bleak. Consumer Price index is expected to reach 10% or higher by the Autumn which Retail Price Index forecast to hit around 13%. In addition to this Electricity and Gas that has already increased looks to increase further by another 30%. The Council will need to balance the ability to absorb some of these costs to ensure further financial burden is not passed onto residents who are already feeling the pressures currently.

### *Council Tax and Business Rates Income*

There is continued uncertainty over the financial impact of the pandemic and the degree of economic recovery, especially on Business Rates. NNDR collection fund deficits are being managed by government grants that have been earmarked within reserves. Local businesses and residents may continue to feel pressures with cost of living increases and higher fuel and energy prices rising. In turn this will continue to put the Council under pressure with potentially lower Council Tax and Business Rate collection Income.

## Housing Revenue Account (HRA)

The Council's Housing Revenue Account for 2022/23 through to 2024/25 was approved by Ordinary Council on 23<sup>rd</sup> February 2022. The HRA forecasts and Working Balances are detailed below:

	2022/23 £'000	2023/24 £'000	2024/25 £'000
Deficit/(Surplus)	(34)	(483)	(461)
Working Balance bfwd	1,480	1,514	1,997
Working Balance cfwd	1,514	1,997	2,457

The budget approach for the HRA will be focused on the provision of a budget which is financially sustainable in the medium term (7 years), generating a materially improved in year surplus year on year and replenishing balances to a level which matches the risks associated with the operation of the HRA.

Rent increases will be in line with Central Government direction of CPI (as at September 2021) plus one per cent - current estimated to be **11%** for 2023/24 which is not acceptable. Central Government have not issued any guidance yet as to the expectation around rent setting, the Council continues to model other increases that are less than this percentage to determine what the minimum increase is required to protect tenants but allow the Council to deliver the service.

### *Repairs contract*

Continues to be bedded in and there will be ongoing pressure to ensure value for money for the service. The introduction of the Building and Regulation Act for Social Landlords will generate a workstream that needs to be funded. Alongside the retro fit requirement for the Council's existing stock.

## Budget Setting Timetable

The Medium-Term Financial Strategy for 2023/24-2025/26 will be reviewed by Policy, Resources and Economic Development Committee on 8 February 2023. This committee will then recommend the final budget for approval including Council Tax setting to Ordinary Council on 1<sup>st</sup> March 2023. The timetable highlights the process and key deadlines officers need to adhere to meet the budget setting requirements for the Council:

<b>Deadline</b>	<b>Action</b>
<b>May</b>	
27 <sup>th</sup>	Draft Outturn Presented to SLT
24 <sup>th</sup>	Draft Outturn presented to Leader and Chairs
<b>June</b>	
28 <sup>th</sup>	Budget Guidelines and Assumptions presented to SLT and ELT
<b>July</b>	
8 <sup>th</sup>	Growth Bid Templates (GF,HRA & Capital) Circulated
8 <sup>th</sup>	Fees & Charges Review Commences
13 <sup>th</sup>	Outturn Report and Budget Guidelines present to PRED committee
TBC	Monthly Financial Update to SLT
TBC	Monthly Finance Session with Leader Chairs & SLT
31 <sup>st</sup>	Partial Exemption Calculation Finalised
<b>August</b>	
TBC	Monthly Financial Update to SLT
TBC	Monthly Finance Session with Leader Chairs & SLT
30 <sup>th</sup>	Budget Consultation goes live
<b>September</b>	
2 <sup>nd</sup>	Council Establishment Review
2 <sup>nd</sup>	Recharge Model allocations reviewed
9 <sup>th</sup>	Capital Growth Bid Deadline
12 <sup>th</sup>	Review of Capital Growth and Financing
TBC	Capital Growths presented to SLT for Review
TBC	Monthly Finance Session with Leader Chairs & SLT
14 <sup>th</sup>	Budget Update presented to PRED Committee
30 <sup>th</sup>	Recharge Allocations returned and recharge model updated.
<b>October</b>	
3 <sup>rd</sup>	Bad Debt and Provisions Reviewed
2 <sup>nd</sup>	Budget Consultation Ends
7 <sup>th</sup>	Rent Model Updated
TBC	Meeting with Treasury Advisors
TBC	CTB1 Submitted – Council Tax Base
TBC	Initial Business Rates Forecast
TBC	Budget Consultation Responses presented to SLT
TBC	Monthly Finance Session with Leader Chairs & SLT
28 <sup>th</sup>	All Growth Bids Submitted

28 <sup>th</sup>	All Fees & Charges Amendments to be submitted
28 <sup>th</sup>	Interest Payable and Receivable Budgets Calculated
<b>November</b>	
TBC	Members Remuneration Panel Held
TBC	Growth Bids and Savings targets presented to SLT
TBC	Monthly Finance Session with Leader Chairs & SLT
23 <sup>rd</sup>	First Draft MTFS presented to PRED
<b>December</b>	
1 <sup>st</sup>	Parish Council's contacted regarding Parish Precept for 2023/24
12 <sup>th</sup>	Housing Committee – Fees & Charges and Rent Setting Approved
19 <sup>th</sup>	Community, Environment & Enforcement Committee – Fees & Charges approved
20 <sup>th</sup>	Planning & Licensing Committee – Fees & Charges approved
TBC	Provisional Settlement Received
TBC	Monthly SLT Finance Update
TBC	Monthly Finance Session with Leader Chairs & SLT
<b>January</b>	
TBC	Final Budget presented to SLT
TBC	Monthly Finance Session with Leader Chairs & SLT
24 <sup>th</sup>	Budget Assumptions presented to Audit Committee
TBC	All Member Briefing on Budget Report 2023/24
31 <sup>st</sup>	Deadline for Parish Precept returns
<b>February</b>	
3 <sup>rd</sup>	Parishes notified of their Council Tax Bandings
8 <sup>th</sup>	Budget presented to PRED committee
<b>March</b>	
1 <sup>st</sup>	Ordinary Council – Budget Set and Council Tax Set

## Budget Setting and Monitoring Guidelines

The Council's budget for 2022/23 through to 2024/25 was approved by Ordinary Council in February 2022. This includes the General Fund, Housing Revenue Account, Capital Programme and Treasury Management Strategy.

Managers are expected to work within the budgets set by Council and no changes will be made to the budget unless approved by the Section 151 Officer and in line with the Financial Regulations as set out in the Constitution.

When reviewing budgets in year and for future years, managers should consider the following:

- Resources should be aligned to deliver the Corporate Strategy.
- Anticipated long term operational impact of COVID-19 should be highlighted by managers early and discussed with their Link Accountants.
- Managers are required to use Collaborative Planning every month to record their estimated outturn for the current year. Working alongside their Link Accountant managers should be highlighting any issues that may affect the outturn and future financial years budgets. It is the Managers responsibility to provide outturn estimates and explanations to variances.
- The year-end outturn is the expected variance between the budget set at Ordinary Council and estimated actual net expenditure. Managers need to ensure they undertake all reasonable actions to manage any budget pressures, as well as maximise any underspends and over-recovery of income. All variances are reported monthly to the Chief Executive, Section 151 Officer, and the Senior Leadership Team.
- Budget update reports will be taken to Policy Resources and Economic Development Committees during the year, allowing members of the committee to review and comment. The reports will be taken to the committees throughout the year.
- Managers are required to review the base budget for the next financial year as agreed at Ordinary Council. This budget is reviewed in Collaborative Planning and allows managers to identify any potential financial issues and capture them when developing the MTFS.
- Managers should be highlighting to their Link Accountants any future legislative, demand or service delivery change which will have a financial impact. The revenue impact of any capital investment also needs to be factored into the MTFS. Link Accountants can work with managers to model the financial impact and update the MTFS accordingly.

Salaries, Fees & Charges, Other Non-Salary Expenditure, Other Income and Growth Bids must be reviewed and considered using guidance as set out below.

## Salary Budgets

When budgeting for the Council's establishment, the following will be applied:

- All vacant posts will be budgeted at the bottom of the grade.
- There will be a vacancy factor set at 4% for all years, this will be held centrally.
- Pay scales are reviewed on an annual basis. The current assumption is that 2% pay inflation will be built into the current pay scales. However, Corporate Finance in light of the cost of living crisis are currently working of other options alongside the financial impact on the MTFS. This will be presented to Chairs and SLT and recommended to PRED as part of the budget setting timetable.
- Increments will be calculated allowing for one additional increment per annum until the employee is at the top of the grade.
- All establishment growth for 2023/24 to 2025/26 will require the approval of a growth bid approved by the Senior Leadership Team and Section 151 Officer.
- Managers need to take into consideration staff who are delivering work on capital projects, as these costs can be charged directly to the capital budget. These arrangements come under external audit review annually and therefore managers need to ensure that there is an adequate audit trail to support the decision.
- Managers will be required to review their establishment information and confirm back to their link accountant that the information is accurate.

## Support Service Recharges

- Support Service areas are required to be recharged to the Direct Service areas. Most of these support areas are considered 'back office', examples include, Finance, ICT, Payroll, HR etc.
- Finance will circulate a proforma to each recharging service area. It is the responsibility of managers to complete the allocation for their service area.
- Managers are requested to supply specific information to support the allocations provided.
- Finance will collate the completed allocations to calculate the recharges which are then built into the budget.

## Other Non-Salary Expenditure

- Inflation, CPI for May was confirmed at 9.1%. The rise was mainly due to a further leap in food price inflation from 6.7% to a 13-year high of 8.5%. With agricultural commodity prices having risen rapidly over the past year and set to continue. Inflation will be monitored throughout the year and will be set by Corporate Finance in the Autumn.
- Insurance budgets will be calculated based on 2022/23 premiums, with an inflation factor applied later on in the year.
- The HRA Repairs and Maintenance contract will have an inflation factor of **2.4%** applied to reflect the higher cost of building materials.



## Fees and Charges

Non-Statutory Fees and Charges income budgets will usually be increased by the estimated CPI of 2022/23, because of the current economic outlook further work needs to be undertaken by Corporate Finance to ascertain a balanced increase. For the purpose of this guidance **2%** is to be set as a minimum. Given the current economic situation, there may be areas which cannot bear the increase in CPI and may even experience a material reduction in income. These areas of income need to be separately identified in the budget preparation along with key assumptions.

The general principle remains that all fees and charges are set on a full cost recovery basis and should be reviewed annually.

It is important that Service Managers review their fees and charges thoroughly and ensure that all charges are included in the schedule. A charge should not be made to members of the public without formal approval by Members.

Any proposed changes should be considered in terms of the impact on the budgeted income levels along with usage/volumes. With the ongoing financial challenges that the Council is facing, managers should have a clear understanding of what drives service income.

Increasing Fees and Charges above the average increase, or not changing them at all needs to be explained and justified in the cover sheet that supports the Fees & Charges schedule. This cover sheet goes to all individual committees to support the Fees & Charges schedules that members are being asked to approve.

All Fees and Charges information will be collated and will be presented to individual committees in December, as outlined in the Budget Setting timetable within this guidance for formal approval.

The VAT liability of each fee and charge will be determined by Finance, in consultation with the Manager if appropriate, and this will be clearly indicated on the schedule of fees and charges approved by Council and posted on the Council's website. Managers should ensure that the correct VAT liability is always applied. Any queries concerning the VAT liability of a fee or charge should be raised with Finance as soon as possible.

## Other Income

- Business Rates for Council properties are reviewed, and any increase is based on the national multiplier, which is restricted to CPI. In the absence of any formal notification, the multiplier should be increased by **2%**. Business Rates retention forecasts will be maintained at safety net levels.
- Council Tax is assumed to increase annually by **2%**. The Council Tax base will increase by **0.5%** growth year on year, however an annual reconciliation process is carried out and the council tax base is realigned to actual levels each year. Further modelling work is being carried out to strengthen future forecasting.

## Growth Bids - Capital and Revenue

When reviewing the base budget for future years, managers are expected to consider whether these budgets are realistic for the delivery of the service. Any increase in the base budget needs a growth bid completed.

Growth bids are to be discussed with the managers Link Accountant and relevant Director. Managers should be mindful of their budgets and whether they are deemed sufficient to deliver the current service and future demand for the service.

No growth will be added to the budget without completion of a growth bid which has gone through the approval process. The growth bid template and guidance on completing the template will be circulated to all managers in July.

All Growth bids will be reviewed by Finance and presented to the Senior Leadership Team for scrutiny. Growth bids will be reflected in the budget once scrutinised by SLT and approved by the Section 151 Officer.

## Capital Financing

When considering capital projects, budget holders need to determine how the project will be financed. Capital Projects can be financed by the following:

- Capital Receipts
- Section 106 – Planning Obligations
- External Grants & Contributions
- Revenue Contributions
- Balances and Reserves
- Borrowing

Capital projects that cannot be funded from any other source can be funded from Prudential Borrowing. The Council must be able to afford the borrowing repayment and interest charges on the loan from existing revenue budgets or the Council must see this as their key priority for the budget process and to be factored into the Medium-Term Financial Strategy accordingly.

The Council does not have excess capital receipts, revenue or reserves to contribute to capital projects that are not within the existing Capital Programme. Therefore, projects that cannot secure funding are assumed 100% funded by borrowing. This will have revenue implications to the Council's revenue budget.

Capital projects will assume that these projects will be short term borrowed during development. On completion of the project, the short-term borrowing will be replaced with long term borrowing aligned with the development's life.

Interest rates to be assumed are:

Short- term rate at 2.5%

Long-term Rates

<b>Period</b>	<b>Forecast Interest Rate (%)</b>
5 Years	3.2
10 Years	3.4
25 Years	3.7
50 Years	3.4

Minimum Revenue Provision (MRP) is based on the Council's MRP policy as outlined in the Capital and Investment Strategy.

Minimum revenue provision for new capital expenditure incurred wholly or partly by unsupported (Prudential) borrowing will be determined by reference to the expected life of the asset on an annuity basis. The asset life is deemed to begin once the asset becomes operational. Minimum revenue provision will commence from the financial year following the one in which the asset becomes operational.

For forecasting, 3.5% is the MRP rate to use on an annuity basis.

There is no requirement on the HRA to make a minimum revenue provision but under HRA reform there is a requirement to charge depreciation on its assets, which will have a revenue effect. The HRA business plan will need to fund this depreciation over the life of the assets.

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## Appendix C

**From:** Jacqueline Van Mellaerts  
**Sent:** 20 May 2022 15:43  
**To:** All Councillors  
**Cc:** Senior Leadership Team; ELT - Corporate Managers  
**Subject:** Financial Challenges

Good afternoon Councillors,

As you are aware, since the 2022/23 budget was approved on 23<sup>rd</sup> February 2022, there have been a number of national and worldwide challenging events that have and continue to take place. I wanted to reach out to you all, to highlight the ongoing challenges, not only for Brentwood Council's finances but also for our residents. I also want to outline the support that is available to our residents during these difficult times.

We are acutely aware that the Ukrainian conflict will have very real impacts on our residents, businesses and communities, and on the services we provide to them. This may well increase the concerns being raised to you by residents in your wards due to the rising cost of living and inflationary pressures i.e the significant increase in fuel and energy prices, which will bring new pressures throughout the year.

Firstly I want to assure you, that we are working closely with central government and Essex County Council in the Homes for Ukraine scheme and the various local authority subgroups by following specific guidance to ensure homes being provided by sponsors are safe and suitable accommodation. Homes are being visited by officers and our community services team are providing extra support to sponsors and our Ukrainian guests by making personal calls and sign posting where appropriate. Our Ukrainian guests are also now receiving their £200 immediate cash payments (and/or bank transfer if their UK banks have already been set up by the help of their sponsors) and our first sponsor £350 monthly payment will be made as soon as they meet all 5 accommodation and safeguarding checks following national guidance.

As stated above, the Ukrainian crisis is not the only challenge we currently find ourselves in, the cost-of-living impacts that are of particular concern are:

- **Household budgets and financial security of our residents** – Brentwood is administering the national energy rebate scheme and following my email on 25<sup>th</sup> April 2022, we are in a position to administer these payments to our Direct Debit payers and they have been receiving their £150 energy rebate directly to their bank accounts from 28<sup>th</sup> April. Our website continues to be updated with new information and our non direct debit users have been contacted and will be supported to complete an online form (ensuring personal details are kept safe and secure) to also receive their energy rebate payments. You may experience your ward residents reaching out to you for further financial support, where you can sign post them to our revenues and benefits team and our website to provide guidance and support should they be experiencing hardship.
- **Financial pressures on Brentwood Council** – The increasing rise in fuel and energy prices will increase the cost of running our own vehicle fleet

(currently budgeted at approx. £426k which included a 4% inflation pressure) and other council services/operations with heavy usage of fuel and energy (such as HRA and Asset management). It is reasonable to assume that these will now exceed forecasted assumptions for 2022/23 set budgets. In the recent spring statement we are seeing RPI inflation rising to 10.3% from 4.6% from the 2021 spending review, but this is predicted to reduce back down to 3.6% in 2023/24. We will continue to monitor these pressures and update you on the impact to our General fund and HRA throughout the year.

In addition to this, we should be mindful that the combination of rising energy and food prices will compound further pressures on many of our residents, therefore this may have implications for rent arrears, housing benefit, council tax support as well as our homelessness services (among other things).

- **Local businesses** - higher fuel and energy prices will put pressure on businesses and could have an impact on business tax revenues throughout the year.
- **Disruption to supply chains and availability of materials** - this has the potential to delay or increase the cost of our capital projects, for instance an impact on our housing development programme. However, we are not seeing a fundamental issue currently, but I am raising this as a potential risk of the future viability of projects.

Another challenging area for this year's budget cycle will be managing the expected National Living Wage (NLW) increases. Although Brentwood Council is not part of the National Joint Committee (NJC) and can currently make local decisions on pay (for 2021/22 we awarded 2%, and have budgeted a further 2% for 2022/23) we have a statutory duty to apply the NLW increase to the lower end of our pay scales. This in turn causes added pressures throughout, ensuring they remain competitive and appropriate.

Using the Local Pay Commission (LPC) forecasts the NLW is expected to increase to £10.70 by 2024 (currently £9.50 from 1st April 2022) and recently the Local Government Association (LGA) have advised that our budgeted future 2% pay awards will not be enough to meet the statutory requirements. Our HR colleagues continue to work with finance and other local authorities as well as myself to ensure we are capturing the future pressures that may arise and deliver on an appropriate strategy.

Finally although COVID restrictions have lifted within the recent months and we are finding multiple sectors are returning back to the 'new normal'. The Council has still budgeted for approximately a £960k decrease on various incomes streams, mainly parking, especially season ticket income as working from home looks set to continue. As we start to see shoppers, workers and residents potentially return to life similar to pre covid, we will be closely monitoring the impact on our economy and the subsequent impact on our finances.

**What are we doing?** As well as the national schemes that are being implemented for our residents and communities, internally we continue to keep the focus by monitoring, reviewing and escalating known pressures within our finances, when

they arise. As you know the finance team has been under significant pressure administrating additional support schemes, and this looks set to continue. In the meantime we continue to focus to apply ourselves to our annual accounts processes and statutory routines. However our leadership teams are and will be engaged throughout the course of the year to manage and deliver within existing budgets as well as working closely with the administration to overcome the challenges highlighted above.

It is important for me to update you on the current financial challenges we continue to face as an organisation and I will continue to do so throughout the year and through the appropriate committees.

If you have any concerns or queries please do feel free to reach out to me or my colleagues to assist.

Many Thanks

Jacqueline Van Mellaerts | **Corporate Director (Finance & Resources) & Section 151 Officer** |  
**Brentwood Borough Council**  
| [www.brentwood.gov.uk](http://www.brentwood.gov.uk) |

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<b>Committee(s):</b> Policy, Resources & Economic Development Committee	<b>Date:</b> 13 <sup>th</sup> July 2022
<b>Subject:</b> Energy Rebate	<b>Wards Affected:</b> All
<b>Report of:</b> Jacqueline Van Mellaerts - Corporate Director (Finance & Resources)	<b>Public</b>
<b>Report Author/s:</b> Name: Jacqueline Van Mellaerts – Corporate Director (Finance & Resources) E-mail: <a href="mailto:jacqueline.vanmellaerts@brentwood.gov.uk">jacqueline.vanmellaerts@brentwood.gov.uk</a>  Name: Robert Manser – Shared Service Revenues & Benefits Manager Email: <a href="mailto:Robert.manser@basildon.gov.uk">Robert.manser@basildon.gov.uk</a>	<b>For :</b> Decision

## Summary

The purpose of the report is to seek authority from Policy, Resources & Economic Development Committee to administer a Local Discretionary Energy Rebate scheme. As well as give information to members on the main energy rebate scheme announced by Government on 3 February 2022.

## Recommendation(s)

**Members are asked to:**

- R1. To give delegated authority to the Corporate Director (Finance & Resources in consultation with the Chair of Policy, Resources & Economic Development to implement a Local Discretionary Energy Rebate scheme as set out in the criteria within this report.**

## Main Report

### **Introduction and Background**

On 3 February 2022, the government announced measures to help protect millions of households from rising energy costs. This included a £150 Council Tax energy rebate. A government initiative energy rebate information leaflet was included to all households with annual Council Tax bills.

The Government has provided funding for billing authorities to give all households in England whose primary residence is valued in Council Tax bands A to D on 1 April 2022, a one-off Council Tax energy rebate payment of £150 (Phase 1). This payment will operate outside of the Council Tax system but will use Council Tax data to identify eligible households.

In Brentwood, there are 19,154 properties which fall into bands A to D. The payments that Brentwood have administered under the automatic rebate scheme total £2,873,100.

Government funding allocations announced confirm that Brentwood's share will be £2,758,900 for the main £150 rebates and £206,100 for the Discretionary scheme (discussed later in this report under Phase 2). Authorities will receive compensation through new burdens funding for the administration of the awards.

Any over-funding of grant to Brentwood will be required to be paid back to Government and any under-funding, as appears likely in Brentwood's case, will be settled with billing authorities following a reconciliation later in the year.

## **Phase 1 – the £150 Rebate**

### Eligibility for the £150 Energy Rebate

Government guidance was issued on the 23 February 2022, updated 16 March 2022 and this sets out the steps local authorities (LAs) must follow to administer the schemes. To be eligible for the £150 automatic rebate, a household must:

1. Be valued in Council Tax bands A – D. This includes property that is valued in band E but has an alternative valuation band of band D, as a result of the disabled band reduction scheme;
2. Is someone's sole or main residence.
3. Is a chargeable dwelling, and
4. The person who is liable to pay the Council Tax (or would be where the property not exempt) is not a local authority, a corporate body or other body such as a housing association, the government or governmental body.

This list is not exhaustive, and Brentwood has used its judgement in consideration of the aims of the scheme, which is to support households with domestic energy costs.

This means that:

- A property that meets all the criteria but has a nil Council Tax liability as a result of local Council Tax support, will be eligible.
- A property that has no permanent resident and is someone's second home will not be eligible.
- An unoccupied property (for the purposes of calculating Council Tax) will not be eligible.

For the purpose of the £150 Energy Rebate, a household is a person or group of persons occupying a single dwelling, as defined in section 3 of the Local Government Finance Act 1992.

Eligibility is determined based on the position at the end of the day on 1 April 2022. Payments will need to be made no later than 30 September 2022 as a reconciliation of funds allocated will take place at that time with any unspent funds by the said date required to be repaid to Government.

The £150 Energy Rebate is made directly to Council Tax payers by Brentwood. This does not need to be repaid. This one-off payment will benefit around 81% of all homes in Brentwood (19,154 out of 34,469 domestic properties on Brentwood's valuation list and 100% of all eligible households whose homes are in bands A-D).

The amount was not a discount or credit to be applied to the tax payers Council Tax account, rather it was a payment that Brentwood made directly to the tax payers bank account (where Brentwood already held bank details from the Council Tax Direct Debit).

Currently, around 55% of our 34,469 Council Tax payers in Council Tax bands A to D pay by Direct Debit. On 26 April 2022 Brentwood successfully made Phase 1 payments to residents that we held existing bank details for. Each resident also received either a text message, email or letter, depending on the contact details held, which confirmed receipt of the energy rebate payment, and publicised the scheme.

In order to make Phase 1 payments where Brentwood did not hold live direct debit details for an eligible household, the government expected Brentwood to make all reasonable efforts to contact households as early as possible to make them aware of the scheme and invite them to make a claim.

Non-Direct Debit Council Tax payers have been contacted either by email or letter, depending on the contact details held, publicising the scheme and asking for them to make an online claim providing their bank details to enable payment. The letter also advised residents that if we didn't receive contact from them by 30 June 2022, that the Council would credit the £150 rebate onto their Council Tax accounts, this is in line with government guidance.

There was also a central publicity campaign undertaken to draw resident's attention to the energy rebate scheme.

All new bank account details provided are subject to 'Spotlight' checks and our normal payment governance to ensure fraud and multiple claims are eradicated or minimised. 'Spotlight' is government's online automated due-diligence tool and highlights areas of risk to inform grant-making decisions.

Staff are available in person and on the phone to support residents applying for their energy rebate. The Revenues & Benefits visiting staff are also available to support vulnerable residents in their homes where there was a need. Where no contact is received from the customer, the default will be for the Council to rebate the credit to the resident's Council Tax account.

As at 30<sup>th</sup> June 15,135 Brentwood Residents have received their £150 Payments out of 19,154 that entitled to the energy rebate scheme. This equates to 79% of households totalling £2,270,250.

## **Phase 2 - The Local Discretionary Energy Rebate Scheme**

The government recognises that billing authorities may also wish to provide support to other energy bill payers who are not eligible under the terms of the core scheme, including Council Tax Bands E to H, or to provide carefully targeted 'top-up' payments to the most vulnerable households in Council Tax Bands A to D. Local authorities will receive a share of £144 million discretionary funding to support this.

Brentwood's share of this pot is £206,100. This funding is to be passed on directly as one-off grants to households that Brentwood chooses to support. Allocations from the discretionary fund will need to be spent by 30 November 2022.

Brentwood need to implement a local discretionary scheme and administer these discretionary payments. Authority is therefore requested from the Policy, Resources & Economic Development Committee to authorise the Corporate Director (Finance & Resources) to draft, implement and administer a Local Discretionary Energy Rebate scheme in accordance with the guidance issued, adopting the following criteria.

### Local Discretionary Energy Rebate Criteria

1. Brentwood Council has determined that the following households will be eligible for a Local Discretionary Energy Rebate payment of £150:
  - a) The household must have gas/electricity/heating oil liabilities if they do not already have a Council Tax liability; and,
  - b) The household must be solely or mainly resident in their property in the Council's area as at 1 April 2022; and,
  - c) The household must be in receipt of either Council Tax Support or Council Tax Reduction as at 1 April 2022, and resident in a Council Tax Band E, F, G or H property in the Council's area; or
  - d) The household qualifies for a means-tested benefit as at 1 April 2022, regardless of Council Tax band e.g. houses of multiple occupation (HMO's).

For the purpose of 1(a), to be treated as having a gas, electricity or heating oil liability, one, or more, members of the household must be legally liable to make payments to a third party for the supply of fuel to heat and light their residence. This may be in the form of an account with a gas, electricity or heating oil supplier or a liability to contribute to a share of the bills as a condition of a tenancy agreement. Only one payment will be made per tenancy agreement.

Where the household is in receipt of means-tested benefits, the name of the main claimant of the means-tested benefit does not need to match the name on the fuel supply account so long as both names are part of the same household. For example,

one partner could be the claimant of the means-tested benefit, the other partner could have the fuel liability in their name.

### The Energy Rebate award

1. Where the household is in receipt of either Council Tax Support or Council Tax Reduction as at 1 April 2022, the discretionary Energy Rebate award amount for a resident in a Council Tax Band A, B, C, D (including a property that is valued in band E but has an alternative valuation band of band D as a result of the disabled band reduction scheme), they will receive an initial payment of £150, then an extra £40 will be awarded, totalling £190 for those residents on a low income.
2. Where the household is in receipt of either Council Tax Support or Council Tax Reduction on 1 April 2022, the discretionary Energy Rebate award amount for a resident in a Council Tax Band E, F, G or H property will be a single payment of £190.
3. No payment of Local Discretionary Energy Rebate will be made after 30 November 2022.

Non-Direct Debit Council Tax payers will be contacted either by email or letter, depending on the contact details held, publicising the discretionary scheme, asking for them to make an online claim providing their bank details to enable payment. The letter will also advise residents that if we don't receive contact from them by 31 August 2022 we would credit the discretionary energy rebate onto their Council Tax accounts, this is in line with government guidance.

There was also a central publicity campaign undertaken to draw resident's attention to the energy rebate scheme.

All new bank account details provided are subject to 'Spotlight' checks and our normal payment governance to ensure fraud and multiple claims are eradicated or minimised. 'Spotlight' is government's online automated due-diligence tool and highlights areas of risk to inform grant-making decisions.

Bank account details will be subject to 'Spotlight' checks and our normal payment governance to ensure fraud and multiple claims are eradicated or minimised. 'Spotlight' is government's online automated due-diligence tool and highlights areas of risk to inform grant-making decisions.

Staff will be available in person at the Council Offices and on the phone to support residents applying for their energy rebate. The Revenues & Benefits visiting staff will also be available to support vulnerable residents in their homes where there is a need.

New burdens funding will be given to LAs to compensate them for the administrative burden of running the scheme and making the payments. This will be on top of the £3.7million programme funding to be paid to Brentwood's residents.

## Breakdown of Energy Rebate payments

Governments £150 Allocation	£2,758,950	
Required £150 Allocation	£2,873,100	(19,154 - Customers)
Additional £150 Allocation Required	-£114,150	

Ctax Band	Non CTS/CTR @ £150			CTS/CTR @ £150			CTS/CTR additional £40		
	No's Customers	Rebate (£)	Total (£)	No's Customers	Rebate (£)	Total (£)	No's Customers	Rebate (£)	Total (£)
A	513	-£150.00	-£76,950	178	-£150.00	-£26,700	178	-£40.00	-£7,120
B	2,156	-£150.00	-£323,400	914	-£150.00	-£137,100	914	-£40.00	-£36,560
C	5,626	-£150.00	-£843,900	1,196	-£150.00	-£179,400	1,196	-£40.00	-£47,840
D	7,913	-£150.00	-£1,186,950	658	-£150.00	-£98,700	658	-£40.00	-£26,320
	16,208		-£2,431,200 (a)	2,946		-£441,900 (b)	2,946		-£117,840 (c)
					Total £150	-£2,873,100 (a)+(b)		Total £40	-£117,840 (c)
								Ctax Band A to D Total	-£2,990,940

Discretionary allocation	£206,100	(354 - Customers)
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Ctax Band	Non CTS/CTR @ £150			CTS/CTR @ £150			CTS/CTR additional £40		
	No's Customers	Rebate (£)	Total (£)	No's Customers	Rebate (£)	Total (£)	No's Customers	Rebate (£)	Total (£)
E	0	£0.00	£0	261	-£150.00	-£39,150	261	-£40.00	-£10,440
F	0	£0.00	£0	65	-£150.00	-£9,750	65	-£40.00	-£2,600
G	0	£0.00	£0	28	-£150.00	-£4,200	28	-£40.00	-£1,120
H	0	£0.00	£0	0	-£150.00	£0	0	-£40.00	£0
	0		£0	354		-£53,100	354		-£14,160
					Total £150	-£53,100		Total £40	-£14,160
								Ctax Band E - H Total	-£67,260

Total £150 Rebate required allocation	£2,873,100
Total Discretionary Rebate allocation	£206,100
Total Energy Rebate allocation	£3,079,200
Total Council Tax Band A to D Rebate	-£2,990,940
Total Council Tax Band E to H Rebate	-£67,260
Total Energy Rebate Payable	-£3,058,200
Balance	£21,000

CTR - Working aged customers in receipt of Council Tax Reduction  
CTS - Pension aged customers in receipt of Council Tax Support

In Brentwood, there are 16,208 properties which fall into bands A to D, entitled to receive an energy rebate of £150, and 2,946 properties that fall into bands A-D that are also in receipt of either Council Tax Support or Council Tax Reduction, entitling them to also receive an energy rebate of £150.

Following the Local Discretionary scheme criteria above, In Brentwood, the 2,946 properties that are in receipt of either Council Tax support or Council Tax reduction which qualify for the main scheme will also be allocated an additional top up of £40 bringing their total allocation to £190. There will also be 354 properties which fall into bands E to H (that don't qualify for the main scheme) but are in receipt of either Council Tax Support or Council Tax Reduction, and will be awarded a single energy rebate allocation of £190.

The remaining £21,000 will be available to support the most vulnerable and those in receipt of income related benefits in Houses of multiple occupation (HMO's).

## **Issue, Options and Analysis of Options**

The Committee may decide to not to authorise the Corporate Director (Finance & Resources) to draft, implement and administer a Local Discretionary Energy Rebate scheme. This is not considered to be appropriate because the proposed Local Discretionary Energy Rebate Scheme criteria is in line the guidance issued and maximises the Energy Rebate funding awarded to Brentwood's residents and would also result in a delay in the payments being made.

## **Reason for Recommendation**

To ensure the Council has a Local Discretionary rebate scheme in place in order to distribute the allocated funding to Brentwood Residents.

## **Consultation**

None

## **References to Corporate Plan**

Ensures the Council is providing quality customer service to Brentwood residents and continues to deliver services that are providing value for money to meet the needs of our residents.

## **Implications**

### **Financial Implications**

**Name/Title: Jacqueline Van Mellaerts, Corporate Director (Finance & Resources) and Section 151 Officer**

**Tel/Email: 01277 312500/jacqueline.vanmellaerts@brentwood.gov.uk**

The Energy Rebate scheme is fully funded by Government. Funding allocations confirm that Brentwood's share will be £2,758,950 for the main £150 rebates and £206,100 for the Discretionary scheme. This funding has been received.

Any over-funding of grant to Brentwood will be required to be paid back to Government and any under-funding will be settled with billing authorities following a reconciliation later in the year.

Authorities will receive compensation through new burdens funding for the administration of the awards.

### **Legal Implications *(Please complete for Director review)***

**Name & Title: Amanda Julian, Corporate Director (Law & Governance) and Monitoring Officer**

**Tel & Email: 01277 312500/amanda.julian@brentwood.gov.uk**

A billing authority is defined at section 1(2) of the Local Government Finance Act 1992

A household is defined as a person or group of persons occupying a single dwelling at section 3 of the Local Government Finance Act 1992

The disabled band reduction scheme refers to reductions provided under the Council Tax (Reductions for Disabilities) Regulations 1992

A chargeable dwelling is as defined at section 4 of the Local Government Finance Act 1992

A local authority is as defined at section 270 of the Local Government Act 1972 and includes any authority listed at section 138 C(1) of that Act

The Regulations require that from 1 April 2022 all local Council Tax support/reduction schemes must disregard scheme payments for eligibility for a Council Tax reduction and the amount of any such reduction in the Council Tax (Demand Notices and Reduction Schemes) (England) (Amendment) Regulations 2022, which came into force on 12 February 2022

**Economic Implications (*Please complete for Director review*)**

**Name/Title: Phil Drane, Corporate Director (Planning and Economy)**

**Tel/Email: 01277 312500/philip.drane@brentwood.gov.uk**

The Energy Rebate scheme is a national scheme that the Government has put in place to help protect millions of households from rising energy costs. This included a £150 Council Tax energy rebate and a discretionary scheme for local design to support vulnerable households. A government initiative energy rebate information leaflet was included to all households with annual Council Tax bills.

**Equality and Diversity Implications**

**Name/Title: Kim Anderson, Corporate Manager (Communities, Leisure & Health)**

**Tel/Email: 01277 312500/kim.anderson@brentwood.gov.uk**

There are no implications arising from the recommendations within this report; the local authority is simply acting as an agent in delivering a prescribed scheme for Government.

However, when Officers have designed the Local Discretionary scheme, taking into account of any guidance issued, the Local Discretionary scheme has due regard to the public sector equality duty, as set out in section 149 of the Equalities Act 2010, and a Service Impact Assessment has been undertaken to ensure that any potential adverse impact to groups that share a protected characteristic are identified, evaluated and mitigated wherever possible.

**Background Papers**

None



<b>Committee(s):</b> Policy, Resources and Economic Development Committee	<b>Date:</b> 11 July 2022
<b>Subject:</b> East Anglia GREEN Non-Statutory Public Consultation	<b>Wards Affected:</b> All
<b>Report of:</b> Phil Drane, Corporate Director (Planning and Economy)	<b>Public</b>
<b>Report Author/s:</b> Name: Camilla Carruthers, Policy Planner Telephone: 01277 312652 E-mail: camilla.carruthers@brentwood.gov.uk	<b>For Decision</b>

## Summary

National Grid Electricity Transmission (NGET) has recently held a non-statutory consultation regarding the East Anglia Green Energy Enablement (GREEN) project. East Anglia GREEN is a proposal to build a new high voltage network reinforcement between Norwich, Bramford and Tilbury. This project is a Nationally Significant Infrastructure Project (NSIP).

This report provides an overview of the project and its potential impacts on Brentwood borough. A draft response had been submitted to comply with the consultation deadline and is subject to committee approval in line with the recommendation (Appendix A). The response objects to the proposed East Anglia GREEN scheme on the basis that it has not been clearly explained why an offshore route cannot be provided, direct impacts on the delivery of Dunton Hills Garden Village, and impacts on Green Belt, heritage, landscape and ecology. This is consistent with other responses from affected local authorities, including Essex County Council (Appendix B) and leaders (Appendix C)

This non-statutory consultation is the starting point for the project. There will be further statutory consultation in 2023. The council requests further ongoing engagement with National Grid on the scheme to help resolve its objections

## Recommendation

**Members are asked to:**

**R1. Approve the response to the East Anglia GREEN non-statutory consultation, as set out in Appendix A.**

## Main Report

### **Introduction and Background**

1. National Grid Electricity Transmission (NGET) are proposing network upgrades called the East Anglia Green Energy Enablement (GREEN) project. The East Anglia GREEN project seeks to upgrade the capacity of the electricity network to facilitate an increase in transmission capacity from 3,200 MW of generation capacity (currently) to 15,000 MW of new generation, plus a further 4,500 MW of new connections in the Eastern region. The project would also connect two new offshore wind farms off the Essex coast to the network, as well as having the capacity to connect new additional offshore proposals that may come forward.
2. The proposal is aimed at helping the country to decarbonising its energy economy, increasing UK produced electricity, and facilitating net zero emissions by 2050, which is a government target. The project in its entirety proposes the following:
  - a) A new 400 kV electricity transmission line over a distance of approximately 180km and a new 400 kV connection substation.
  - b) The reinforcement comprises mostly of overhead line (including pylons and conductors) and underground cabling through the Dedham Vale Area of Outstanding Natural Beauty (AONB) and a new 400 kV connection substation in Tendring district.
  - c) Cable sealing end compounds to connect sections of the underground cable with the overhead lines.
3. The preferred route for the 400kV powerline would enter Brentwood borough to the northeast of Ingatestone (from the Chelmsford area) and broadly run close to the borough's eastern boundary with Basildon borough.
4. As a Nationally Significant Infrastructure Project, the planning process will be overseen by the government through a specialist unit of the Planning Inspectorate. National Grid will be seeking a 'Development Consent Order' (DCO) from the government, as opposed to planning permission from the local planning authority. Brentwood Borough Council, like the other affected councils, are classified as 'Host Authorities' for the purposes of the Planning Act 2008 and The Infrastructure Planning (EIA) Regulations 2017. As a Host Authority, the council plays an important role in helping to shape and assess the impacts of the proposals. However, the Planning Inspectorate are the determining authority for the development.

5. The project is currently at a non-statutory consultation stage. It is expected that National Grid will undertake extensive community engagement and liaison with the host authorities between now and the submission of the Development Consent Order. The Council will be seeking to agree a Planning Performance Agreement (PPA) with National Grid to agree project inputs and outputs, timeframes and reimbursement of relevant council costs.
6. The currently anticipated timescales for the Development Consent Order process are as follows:
  - a) Statutory Consultation during Q2 2023
  - b) Environmental Impact Assessment from Q3 2022 to Q2 2024
  - c) Submission of Development Consent Order application to the Planning Inspectorate during Q3 2024
  - d) Examination, recommendation by the Planning Inspectorate and decision by the Secretary of State from Q4 2024 to Q2 2026
  - e) Build by National Grid commences during Q1 2027
  - f) Operation begins in 2030
7. The council has been and will continue to work closely with all of the affected local authorities impacted by the proposed preferred route, through forums such as the Essex Leaders and Chief Executives forum, and Association of South Essex Local Authorities (ASELA). This has enabled the sharing of concerns and consistency of response with one voice, aligning the authority with colleagues in Essex, Suffolk and Norfolk.
8. With its partners 'Place Services', Essex County Council has led on the coordination and submission of a technical response to the consultation on behalf of affected authorities in Essex, Suffolk and Norfolk (Appendix B). This sets out a strong objection to the East Anglia GREEN proposals as currently proposed.

## **Issue, Options and Analysis of Options**

### **Project Proposals in Brentwood Borough**

9. The proposed route area enters Brentwood borough to the northeast of Ingatestone, from the Chelmsford area. Running north-south it crosses the A12, the railway line and Stock Lane, before passing adjacent to the grounds of Ingatestone Hall. The route then travels south within the borough, passing midway between Hutton on the west and Billericay on the east, crossing Rayleigh Road to the west of Havering's Grove. Continuing southward largely through agricultural land, running broadly parallel to the Brentwood/Basildon boundary, crossing in places. The route crosses the A127 and proceeds to

track the borough eastern boundary passing through the Dunton Hills Garden Village site, before exiting the borough by crossing the railway line on the border of Thurrock district. It is stated that within this section the proposed route will be made up of new overhead powerlines supported by steel lattice pylons.

10. National Grid is undertaking a phased options appraisal and assessment process when developing proposals for reinforcement of its network. The process seeks to meet National Grid duties and follow relevant policy and guidance when deciding on the project. National Grid is currently at the options identification and selection stage of the process and is seeking feedback during this consultation on the work carried out to date.
11. The Corridor and Preliminary Routeing and Siting Study Report (CPRSS), outlines a number of different types of alternative options available, which includes technology for offshore connections. However, the appraisal of strategic options has concluded that the East Anglia GREEN project should be comprised of onshore reinforcement with a new 400kV onshore line.
12. There has been limited discussion on the consultation documents or offshoring cabling options, suggesting that the proposed route option has not been fully considered or open for full scrutiny by the public. This is a point raised within the council's draft consultation response (Appendix A, paragraphs 5 & 6), and stated in the response from the Chair of the Essex Leaders and Chief Executives Group (Appendix C), amongst others. In addition, other borough specific issues are identified below. Until it can be demonstrated that the options for an offshore approach to delivery of the transmission network have been thoroughly considered, it is proposed that the council should object to the proposed development.

### **Borough specific Issues**

13. As referred to previously a response, coordinated by Essex County Council in partnership with 'Place Services', on behalf of the affected local authorities is focused on the wider archaeology, heritage, conservation, and ecology implications of the proposal (as set out in Appendix B). In addition to this joint high-level response the BBC response emphasises the need for further consideration of the following key issues of local significance (as set out in Appendix A):

#### ***Dunton Hills Garden Village***

14. The council's draft response sets out disappointment with the lack of pre-engagement from National Grid prior to publication of the consultation

documents. Most notably, this has led to a lack of recognition of the proposed route passing through new development planned at Dunton Hills Garden Village, which has recently been allocated in the Brentwood Local Plan alongside a live planning application and several years' worth of collaborative masterplanning (of which National Grid were involved).

15. Through its consultation response, the response highlights fundamental inaccuracies with the East Anglia GREEN options appraisal (CPRSS), which incorrectly concludes that there are no local plan allocations directly affected by the proposed route (Appendix A, paragraphs 9-14).
16. The preferred route of the transmission line has the potential to seriously undermine the delivery of Dunton Hills Garden Village (which is to provide 21% of the boroughs total housing provision to 2033), and in doing so will have clear negative implications for housing delivery in the borough and across South Essex. This is an area of acute housing need and affordability pressures, coupled with strong projected population growth.
17. The response supports a separate response submitted by CEG, the lead developer for the garden village, which provides a more focused and technical impact assessment of the preferred route.

### ***Green Belt***

18. The proposed route passes through Green Belt land within the borough. The scheme will pose significant impacts on the openness of the Green Belt and the council has raised concern in this regard. This is a point also made by other Essex authorities, including Basildon Borough Council informed by engagement between Brentwood and Basildon councils.

### ***Heritage***

19. The proposed route will pose a significant impact on the setting of Ingatestone Hall and Heron Hall and potentially direct impact for significant Ancient Monuments. The council has stressed the importance of a full assessment of the impact of the proposal on the historic, architectural, and associative value of these heritage assets and all other effected heritage assets across the route.

### ***Landscape and Ecology***

20. The council has highlighted the potential landscape and visual effects on Thorndon Country Park and requested that information on views be provided, from which need to be carefully considered and assessed. In addition, the

response highlights the need to carefully consider the sensitivity of the Writtle Forest Ancient Landscape, through which the route passes close to.

### **Summary of response**

21. In summary the council's response objects to the proposed East Anglia GREEN scheme as presented, with an emphasis on the below considerations/options:
  - a) To minimise onshore infrastructure and the associated impact on communities and environment, the council's strong preference is for an offshore approach to deliver the transmission network.
  - b) The council request that National Grid reconsider its evaluation and selection of the preferred corridor prior to undertaking statutory consultation.
  - c) In the event that the need for onshore cables can be demonstrated and that rerouting not be reassessed to be a favourable option, the council requests that the proposed transmission line is moved further to the east away from the Dunton Hills Garden Village allocation, with due consideration given to additional mitigation measures, principally being undergrounding or the use of T-pylons.
22. The council requests further ongoing engagement with National Grid on the scheme to help resolve its objections.

### **Consultation**

23. National Grid has undertaken a non-statutory consultation for an eight week period, from 21 April to 16 June 2022. The council's response (Appendix A) was submitted to comply with the consultation deadline and is subject to committee approval.
24. National Grid publicised the consultation via a range of measures, including sending out newsletters to residents, parish councils, local authorities and businesses within a 1km radius from the edge of the preferred option corridor. The non-statutory consultation included webinars, face to face events and information points open to the public. This included a public information event held at Ingatestone and Fryerning Community Centre on 28 April 2022, where National Grid staff were in attendance to discuss the project and answer questions.
25. This non-statutory consultation is the starting point for the project. There will be further statutory consultation in 2023.

## **References to Corporate Plan**

26. The Corporate Strategy identifies priority areas, which include protecting our environment, growing our economy, improving housing, and developing our communities. The project affects strategic priorities through its proposals.

## **Implications**

### **Financial Implications**

**Name/Title: Jacqueline Van Mellaerts, Corporate Director (Finance & Resources)**  
**Tel/Email: 01277 312829/jacqueline.vanmellaerts@brentwood.gov.uk**

27. The council will commence negotiations with National Grid to cover the costs of engaging in the project via a Planning Performance Agreement (PPA). This is to cover the local planning authority costs associated with assessing the impact of the project at the various stages.

### **Legal Implications**

**Name & Title: Amanda Julian, Corporate Director (Law & Governance) and Monitoring Officer**  
**Tel & Email: 01277 312500/amanda.julian@brentwood.gov.uk**

28. The Planning Act 2008 sets out provisions for the Nationally Significant Infrastructure Project pre-application process, including a duty for the proposer to consult parties including local authorities and communities affected.
29. The comments submitted by the council respond to this non-statutory consultation and the council will need to continue to engage in the project as it progresses with further statutory consultation.

### **Economic Implications**

**Name/Title: Phil Drane, Corporate Director (Planning and Economy)**  
**Tel/Email: 01277 312610/philip.drane@brentwood.gov.uk**

30. The proposed route puts the delivery of Dunton Hills Garden Village at risk in that it reduces the development and therefore viability, among other things. That would have negative implications for housing delivery in the borough and across the South Essex, which by extension impacts specific employment land to be delivered as part of the garden village as well as the wider economic benefits that would be reduced or lost entirely. Therefore, it is important that the council identifies these issues and engages with National Grid to help identify alternatives.

## **Equality and Diversity Implications**

**Name/Title: Kim Anderson, Corporate Manager (Communities, Leisure and Health)**

**Tel/Email: 01277 312500/kim.anderson@brentwood.gov.uk**

31. Ongoing consultation undertaken by National Grid will need to include consideration of equality and diversity.

**Other Implications** (where significant) – i.e. Health and Safety, Asset Management, Risk Management, Section 17 – Crime & Disorder, Sustainability, ICT.

32. The council has sought confirmation in its response that full consideration be given to health implications associated with the proposed route and wider project.

## **Background Papers**

- Supporting information for the East Anglia GREEN project is provided on the National Grid website at: <https://www.nationalgrid.com/electricity-transmission/network-andinfrastructure/infrastructure-projects/east-anglia-green>

## **Appendices to this report**

- Appendix A: Brentwood Borough Council response to the East Anglia GREEN project, non-statutory consultation, June 2022
- Appendix B: Essex County Council response to the East Anglia GREEN project, non-statutory consultation, June 2022
- Appendix C:





## **Brentwood Borough Council response to the East Anglia Green Energy Enablement (GREEN) project, non-statutory consultation, June 2022**

1. Brentwood Borough Council welcomes the opportunity to engage with National Grid on the East Anglia Green Energy Enablement (GREEN) project to build a new high voltage network reinforcement between Norwich, Bramford and Tilbury. This is a complex project and one which as proposed, has a direct impact upon Brentwood borough, with part of the preferred route for the new high voltage overhead transmission line proposed to go through the east and southeast of the borough.
2. The council recognises the significance of the proposal and is grateful for the opportunity to provide feedback ahead of the formal stage of statutory consultation, which as noted, is proposed to take place in 2023.
3. Please note, this response forms only part of the council's representation to the consultation. In addition to this response a joint consultation response, coordinated by Essex Place Services on behalf of the affected Local Authorities, has been produced with a focus on the wider archaeology, heritage, conservation, and ecology implications. The council has also engaged with adjoining authorities who will be making similar responses and is a partner in the Association of South Essex Local Authorities (ASELA), who should be engaged going forward about this nationally significant infrastructure project.

### **Principle of development**

4. The council is disappointed with the lack of pre-engagement from National Grid prior to publication of the consultation documents. Most notably, this has unfortunately led to a lack of recognition of the proposed route passing through new development planned at Dunton Hills Garden Village, which has recently been allocated in the Brentwood Local Plan alongside a live planning application and several years' worth of collaborative masterplanning (that National Grid have been involved in). A point emphasised within the consultation response from the Chair of the Essex Leaders and Chief Executives Group.
5. To minimise onshore infrastructure and the associated impact on communities and environment, the council's strong preference is for an offshore approach to deliver the transmission network. There is limited discussion in the

consultation documents of any merits or otherwise in offshoring the cabling, indicating that this route option has not been fully considered at present.

6. Until it can be demonstrated that the options for an offshore approach to delivery of the transmission network have been properly considered and the impacts and concerns highlighted within this response have been addressed, Brentwood Borough Council objects to the proposed development.
7. We endorse the response made by Gateley Hamer, on behalf of CEG Land Promotions Ltd (the principal land promoters for the allocated site at Dunton Hills Garden Village). This sets out in detail the impact of the proposed high voltage development on the delivery of this site allocation to deliver much needed new homes, jobs and supporting community facilities.
8. Notwithstanding the council's position of objection, and without prejudice to that position, the following technical and issue specific comments are offered.

### **Critique of 'Corridor and Preliminary Routeing and Siting Study (CPRSS)**

9. The council wishes to bring attention to the fact that there is a fundamental inaccuracy/oversight in the options appraisal in relation to corridor section 'R' (a section routeing north of Colchester and to the south of Ardleigh Reservoir). Appendix D of the Corridor and Preliminary Routeing and Siting Study (CPRSS) (April 2022) states *"In terms of local plan allocations in the Colchester, Braintree and Brentwood LPA areas there are no local plan allocations directly affecting the section" (D15)*. Following years of extensive consultation, the Brentwood Local Plan was adopted on 23 March 2022. The Local Plan contains strategic allocation R01 'Dunton Hills Garden Village', which has an indicative capacity for around 4,000 homes together with necessary community, retail and employment development and comprehensive infrastructure to support a self-sustaining, thriving and healthy garden village. Section R within the CPRSS runs directly through the Dunton Hills Garden Village allocation site, rendering this statement within the options appraisal inaccurate and calling into question the robustness of the options appraisal through which the preferred route, which includes section 'R', has been identified.
10. It's noted within the CPRSS document itself, reference is made to the Dunton Hills Garden Village allocation, as extracted below:

*"Section R also passes through an area allocated for residential development, referred to in the Brentwood Emerging Local Plan as the Dunton Hills Garden Village. This area, to the west of Basildon, has two existing overhead lines passing directly across it and as a result it is considered that high voltage overhead lines have not been seen as a barrier to development coming forward on this site. This allocation is therefore not considered to be a differentiating factor between the options." (Page 117)*

11. As referred to previously, the Brentwood Local Plan was adopted on 23 March 2022 within which Dunton Hills Garden Village forms a strategic allocation. The Council wishes to bring attention to the fact the conclusions drawn within this statement are not correctly made, because the adopted Dunton Hills Garden Village allocation site's redevelopment is predicated on the undergrounding of the existing 132kV + 11kV overhead lines that run across the site. This undergrounding will be required to deliver the site's projected quantum and quality of development, which has been informed by comprehensive masterplanning work that forms part of the Council's Local Plan's evidence base, of which National Grid have been involved.
12. It is further noted the CPRSS makes no reference to the fact an active planning application for the majority of the garden village has been received (validation date 13 September 2021) by the council as local planning authority and is in the process of being determined.
13. This evaluation of the CPRSS suggests a route was chosen with little knowledge as to what exists and what development is planned in the borough. As a result, National Grid has yet to assess the comprehensive feasibility of undergrounding the proposed 400kV power lines within the Garden Village site, and we are aware that in consequence there is possibly a need to explore alternative options such as an offshore approach to deliver the transmission network or completely circumventing the Dunton Hills Garden Village site.
14. Given the strategic importance of the garden village, its allocation within an adopted local plan, and in light of the identified inaccuracies, the council requests that National Grid reconsider its evaluation and selection of the preferred corridor section 'R' prior to undertaking statutory consultation.

### **Impact of the proposal on Dunton Hills Garden Village**

15. The preferred route of the transmission line has the potential to seriously undermine the delivery of the adopted Dunton Hills Garden Village allocation (which is to provide 21% of the boroughs total housing provision to 2033), and in doing so will have clear negative implications for housing delivery in the borough and across the South Essex Housing Market Area. An area of acute housing need and affordability pressures, coupled with strong projected population growth. The delivery of this allocation being a public interest point.
16. It's not simply the physical impact of the overhead line but the 'stand offs' creating no build areas, on a site that is already constrained by a gas main running across the site, with a "no-build" easement strip. The potential for further infrastructure constraints within the allocation site risks prejudicing the quantum of development that can be achieved, the garden community principles upon which the allocation was formed, as well as Brentwood's growth strategy. Viability of the allocation will be adversely affected by virtue of the scheme, with a detrimental effect on outlook from any properties

towards what will be large pylons. Again, serving to undermine the garden community principles.

17. To this extent in the event that the need for onshore cables can be demonstrated and that the rerouting of corridor section 'R' not be reassessed to be a favorable option, the council requests that the proposed transmission line is moved further to the east away from the Dunton Hills Garden Village allocation, with due consideration given to additional mitigation measures, principally being undergrounding or the use of T-pylons.

### **Other impacts**

18. As referred to previously a joint response, coordinated by Essex Place Services, on behalf of the affected local authorities is focused on the wider archaeology, heritage, conservation, and ecology implications of the proposal. In addition to this joint high-level response the council wishes to emphasise the need for further consideration of the following key issues of local significance (please note, this list is not exhaustive and does not prejudice the consideration of any other issue):

- a) **Green Belt:** It is noted the proposed route passes through Green Belt land within the borough. Clearly the scheme will pose significant impacts on the openness of the Green Belt and the council wishes to raise concern in this regard. The council acknowledges the starting point is for 'overgrounding' of cabling and infrastructure on schemes of this nature, other than in extremely sensitive areas such as Areas of Outstanding Natural Beauty (AONB). However, undergrounding appears to have been ruled out on grounds of cost, but there is little evidence showing that a conventional viability assessment has been undertaken. Furthermore, it's noted there is limited discussion of any merits or otherwise in offshoring the cabling. In order to minimise onshore infrastructure and the associated impact on communities and environment, the Council requests that an offshore approach to deliver the transmission network be fully considered, and its assessment set out clearly within the supporting documentation.
- b) **Heritage Assets:** It's noted the proposed route passes through the grounds of Ingatestone Hall (Grade I listed) and passes within close proximity to Heron Hall (Grade II listed). These areas contain both above ground built heritage of high designation status but also contain Scheduling's for which Historic England act as statutory consultees. The scheme as proposed will pose a significant impact on the setting of these listed buildings and potentially direct impact for significant Ancient Monuments and as such the council wishes to stress the importance of a full assessment of the impact of the proposal on the historic, architectural, and associative value of these heritage assets (above and below ground) and all other effected heritage assets across the route. Detailed advice with the regional team at Historic England Cambridge is advised.

- c) **Thorndon Country Park:** The council wishes to highlight the potential landscape and visual effects on Thorndon Country Park, the views from which should be carefully considered and assessed. The site is on the Historic England Register of Parks and Gardens of Special Historic Interest (Grade II\*) as well as a regionally important country park.
- d) **Writtle Forest Ancient Landscapes:** It is noted the proposed route passes close to this natural heritage asset in the northeast corner of the borough, this landscape includes designated ancient woodland and protected lanes. The council wishes to highlight it as an area of particular sensitivity
- e) **Public Health:** The council seeks confirmation that full consideration has been given to health implications associated with the proposed route and wider project.

### **Future Engagement and Resolution of Objections**

- 19. The council requests further ongoing engagement with National Grid on the scheme to help resolve its objections.
- 20. We thank National Grid for involving the council in this early non-statutory consultation and note the effort that has gone into preparing consultation material and holding public information events. The council looks forward to continued dialogue on the concerns identified in this response.

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# Appendix B

Essex County Council  
County Hall  
Market Square  
Chelmsford  
CM1 1QH



Mr Simon Pepper  
Senior Project Manager  
National Grid  
East Anglia Green

Our Ref: MW/EAG.NSR22  
Date: 16 June 2022

[simon.pepper@nationalgrid.com](mailto:simon.pepper@nationalgrid.com)  
[EastAngliaGREEN@nationalgrid.com](mailto:EastAngliaGREEN@nationalgrid.com)

Dear Mr Pepper

**RE: Town and Country Planning Act 2008. National Strategic Infrastructure Project East Anglia Green. Non Statutory Consultation Q2 2022.**

Thank you for consulting Essex County Council (ECC) in our role as statutory consultee on the above-mentioned non statutory consultation (21 April - 16 June). This response represents the corporate technical response from ECC at this time. ECC reserves the right to update our formal position which is one of objection, based on evidence, engagement and other matters during the progress of this project.

In summary ECC wishes to strongly object to the scheme as submitted within this non-statutory consultation and raises the following headline issues:

- ECC stand with the affected communities and Councils along the route of the proposal in objection to the development as is proposed at this time due to its significant and lasting detrimental impact on its residents, communities, landscape, environment and quality of life.
- ECC's wish is for the development to focus on a sea link solution negating the need for an overland based option.
- The route as given to us comes almost as fixed without the necessary evidence or engagement in pre consultation, hence this consultation itself is considered premature and misguided at this time.
- The proposals ignore in combination effects with other NSIP proposals including those coming forward for transport infrastructure including the A12 and potentially the A120.
- The development will prejudice planned for and potential areas of future growth in Essex.
- All options moving forward should be the subject of extensive consultation.

## **Overview**

In addition to our statutory role, ECC has a wider leadership role in protecting and promoting the interests of the county's communities, businesses and environment which are of utmost importance. We also recognise the contribution ECC makes to the unique character and quality of Essex as a place within the wider eastern region. Whilst acknowledging the Government's net zero objectives, ECC are mindful of energy security, carbon reduction and energy poverty issues related to the delivery of energy development schemes and offer this response in the context of how these issues affect the County and the wider region.

Within Essex there has been a notable increase recently in the number of NSIP proposals and other large-scale energy developments coming forward with a high proportion located within the eastern region. This means that some communities are seeing a multiple number of proposals being promoted in the same area. East Anglia Green makes the total of nine live NSIP projects in Essex at same time. Whilst it is understood that this NSIP proposal comes forward at this time, ECC remains concerned that there is no overall co-ordination between the projects, nor any assessment of their potential cumulative impacts, which is an omission that needs to be addressed.

Although ECC recognises the challenge of achieving net zero as set out by Government, to meet both the ongoing energy security concerns and recognises it's role in contributing to the government's climate change objectives, the EAG NSIP proposal would, by means of its size, nature and extent have substantial, lasting and seriously detrimental impacts on the residents, communities, businesses, infrastructure and environment of Essex. Hence ECC fails to be satisfied that this project, at this early non-statutory consultation stage represents the most appropriate solution to the network reinforcement objectives it is intended to address.

ECC's objective is to seek a coordinated, offshore approach to deliver the transmission network reinforcement objectives of this and other projects in the region, in order to minimise onshore infrastructure and the associated impacts on the Districts, City and Borough communities and the wider environment. The sheer scale and extent of this proposal as presently proposed should not be underestimated, as presented it will have a lasting impact on Essex for generations.

At this time, and on the basis of the information submitted by way of this consultation, and in the absence of greater clarity around the options for strategic offshore coordination of transmission reinforcement and a sub-sea alternative for this project, Essex County Council **strongly objects** to the proposed development at this time.

## **Background**

It is understood the EAG seeks to upgrade the capacity of the electricity network to facilitate an increase in transmission capacity from 3,200 MW of generation capacity currently to 15,000 MW of new generation plus a further 4,500 MW of new connections in the Eastern region. EAG would also connect two new offshore wind farms off the Essex Coast to the network (North Falls offshore and Five Estuaries currently in early project



development but predicted to be operational by the end of the decade) as well as having the capacity to connect new additional offshore proposals as may come forward to the Grid.

We understand the purpose of bringing forward this proposal has to align with decarbonising our energy economy, increasing UK produced electricity, and facilitating Net Zero emissions by 2050 which is a Government target.

The Government's Climate Change Committee predicts that electricity demand will double by 2050 and to respond it is recommended that renewable energy projects are deployed at a scale to include 40 GW of offshore wind by 2030 and 140GW by 2050 with 400,000 additional jobs required to service the sector. It is correct that 60% of offshore wind development brings energy along the East coast and consequently the existing network needs to be updated to meet this challenge of getting this consented power to the consumer.

We note that the National Grid publish annual recommendations in their Network Options Assessment Report (NOA). The need to reinforce the network within East Anglia has been identified as critical in both the 2020 and 2021 NOA reports to not only accommodate developments consented off the East Anglian coast, but to facilitate the development of others which are currently in the system.

National Grid have a duty under the Electricity Act 1989 to develop transmission network proposals in an efficient, coordinated, and economical way, and in manner which considers both people and places. Options to deliver additional network capacity must be evaluated against these statutory duties.

As a project, EAG seeks to reinforce the transmission network between the existing substations at Norwich Main in Norfolk, Bramford in Suffolk to Tilbury, Essex. This is mostly via an overhead 400KV line with lattice/other pylons and conductors with underground cabling through the Dedham Vale and Stour Valley AONB. A new substation is also proposed in Tendring District (Little Bromley). Cable Sealing End Compounds (CSE) are needed to connect sections of underground cable with the overhead line where the line moves from above/underground. The vast majority of the proposal hereby consulted on will run the entire length of Essex.

This non-statutory consultation presents EAG as a scheme which has undergone change to its route selection since conception. A number of options and/or technologies have been put forward including:

- On shore connection via Alternating Current (AC) overhead lines and underground cables through the AONB national designation.
- Offshore high voltage Direct Current (HVDC) cables.
- Onshore HVDC cables
- Upgrading existing infrastructure to 400 KV where currently operating at lower voltages.

## **Discussion and Recommendations.**

However, none of this optioneering process has been the result of consultation with ECC nor any other District Council in Essex or stakeholders as far as we are aware, and the reason given for the same is speed. It is acknowledged that there is a need to meet set targets, however with the proliferation of NSIPs' being consented and proposed, it seems that this Grid project is very late to being considered and has little if any early engagement within Essex or our communities. With development on and off the so called "Energy Coast", having been proposed and promoted for many years, it is correct to ask why EAG is so late to being put forward. To ECC it looks and feels like the EAG proposal has come forward as afterthought and has been promoted in a hurry, whilst it could have been appropriately planned, programmed and considered with both statutory consultees and with the many local communities it will significantly impact. This should have happened at a much earlier stage.

It is particularly unclear why sub-sea cabling options have not been brought forward for the eastern region in the same way as is being developed for the north of England and Scotland. Whilst this will have an impact, the value of doing this will be hugely significant as it will remove the need for an overhead connection throughout the centre of Essex, and indeed Suffolk and Norfolk, removing its massive impact on the landscape, communities, amenity, environment etc.

ECC share the view of many of our local communities that, as far as is practicable, new offshore generated electricity should be transmitted offshore, making landfall as close to the target population centres as possible. ECC acknowledge OffSET and the campaign for a comprehensive and joined-up offshore grid, which we believe is firmly in the interests of business - both offshore windfarms themselves and wider interests such as Sizewell, Felixstowe and Harwich Freeport East (Bathside Bay) would have significant and lasting environmental and social benefits and would help to futureproof the network making it more adaptable to future change.

It is also correct that the route as is proposed at this time would prejudice areas of planned for housing growth. The route as it is at this time, taking one example, proposes to go across the Dunton Hills Garden village, allocated in the recently adopted Brentwood Local Plan for strategic housing growth. In addition, placing the cable route on the periphery of many Essex towns and villages would restrict potential areas of planned future growth.

Essex contributes significantly to agricultural food production, the presence of a power connection could prejudice production of crops across its length, ruling out the use of some of the best and most versatile agricultural land as a result.

Essex also has an advanced strategic road network for the easy flow of goods and people throughout the County, contributing to its economic value. The route as is proposed has an unplanned for and confused relationship with the existing and proposed strategic road network including but not limited to the A12 (where it crosses the road twice) and the A120 which themselves are either currently proposed by, or anticipated to be the subject, of NSIP submissions. It does not appear that the current proposals plan for or take into account either at this time.

A NSIP project being progressed through the Development Consent Order process, has the duty to consult under the 2008 Planning Act, as well as the 2017 Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. As a project of this size, what is proposed will need to be accompanied by an Environmental Impact Assessment (EIA). The principle of the same is as set out in both statute and in accompanying case law.

The proposal as presented acknowledges that the development is at an early stage, with at least one additional stage of formal consultation as is currently proposed. It has to be remembered that the total length of this NSIP proposal measures 180km hence the potential significant, generational life changing impact on multiple communities cannot be understated. At this time as presented this very much feels like the NG's focus is on consulting on one chosen route corridor and one option within the same, and this is considered premature at this important time. We need to see alternative options and the evidence that sits behind each of these.

Therefore it is apparent that the NG is consulting on one route corridor and have either discounted or not fully assessed the other alternative options. This non statutory consultation has taken place after these decisions have been made by NG and in advance of stakeholders being able to see and evaluate the impacts of the alternatives.

The Project documentation states that studies will be carried out to inform design and decision making, which will then inform, for example, transport and construction plans. However, it is considered that as submitted the consultation does not, in any meaningful way, consider the material impacts of the currently discounted alternatives in either relative or absolute terms whatsoever. The consultation documents are all high level and consider what could be affected by the alternatives without looking at the actual environmental and social implications of the same.

Hence it is reasonable and correct to conclude at this time that NG have fixed the route and discounted alternative options, including additional undergrounding and undersea routes, upgrading existing infrastructure etc and without first evaluating and providing evidence necessary to the DCO process so the environmental and social impacts of the preferred corridor, when set against the alternative options, cannot, in any reasonable way, be considered as appropriate. ECC is of the view that the decision to fix the route within the currently consulted corridor is premature and unsupported by evidence, hence the preferred corridor route is also premature.

The current non-statutory consultation is therefore considered to fall unacceptably short in terms of providing evidence and information to make an informed comment on the environmental impact. In terms of what NG propose in mitigation to offset the significant impact of the proposal this is considered wholly underdeveloped.

Although it is acknowledged that the consultation is non-statutory, it nevertheless seeks to place value in the DCO process, and without evidence being provided as to the options within it, it cannot be foreclosed. ECC consider that the process needs to be revisited, considered and examined so responses to the alternatives, including an undersea link,

can be appropriately considered. The preferred route is set in this consultation as almost a “fait accompli” which in itself is not based on sound evidence and consideration.

It is remembered that there are other comparable NSIP proposals for Grid connection proposals, and here the current live Bramford to Twinstead project by NG is referenced. This project underwent significant pre-consultation discussions on route options over a long period of time, yet EAG has undergone none of this pre engagement whatsoever. This is considered a demonstrative and significant flaw in the process at this time with which proper planning could and should have been undertaken.

It is questioned whether this round of consultation fails to demonstrate the need for the connection as is proposed at this time, as it is lacking within the current electricity 10-year statement which would provide prima facie evidence on need. Similarly, the project is presented in advance of the proposed and imminent offshore transmission review, and the amended Network Options Assessment which will accompany it.

In the absence of greater clarity around the options for strategic offshore coordination of transmission reinforcement and a sub-sea alternative for this project, ECC consider that the overland alternatives for this are detrimental to both the new places that are being planned for, and the local communities it effects. The environmental harm caused by the development fails to be adequately explained, planned for, or mitigated against at this time.

Whilst recognising this is an early pre-application phase of engagement, there is absolutely no support from ECC as to the route as is preferred at this time. There appears to be scant explanation or justification for what was being proposed as this seems to have jumped to a solution rather than looking at options. EAG has departed from other energy infrastructure projects by looking at route options in isolation, and not in consultation with stakeholders, hence the option that is proposed seems imposed rather than on the basis of evidence or justification.

This consultation as submitted shows the project not at a formative stage, it is considered that there are insufficient reasons to substantiate the “preferred option” to enable constructive and informed responses for all consultees, which and as it stands significantly and demonstrably harms the consultation process for both the consultees and NG. It is acknowledged that the consultation at this time is non statutory, nevertheless its purpose is to seek to develop and shape the proposals as they come forward. Without adhering to the basic principles of consultation at the outset this means that the entire process will be ill informed, biased and skewed to its lasting detriment. Without an acknowledgment this proposal has been poorly prepared and inadequately communicated and evidenced, hence in the view of ECC this will be extremely difficult for NG to take forward without a pause and a serious rethink.

At this early non-statutory consultation stage, no background evidence is provided in support or explanation for scrutiny. Simply stating this will follow in later stages of engagement is not good enough. The project timetable seeks to submit a formal DCO application in December 2024 which is considered unrealistic given that the information that supports this consultation is required, to evidence options properly considered and to

be scrutinised. Whilst the Council and other stakeholders will be involved in a series of thematic working groups to investigate and influence how the proposal can best be finessed to minimise impacts on the environment, economy and communities, the route as is proposed at this time is underdeveloped and inadequately evidenced and will cause demonstrable harm to interests of acknowledged importance and the communities it will directly effect.

Without a detailed evidence base to assess the route options it is simply not possible to critically evaluate the validity of the suggested approach and conclusions drawn on technology, including but not limited to an undersea link, and routing to enable the magnitude of impact of the preferred scheme on key constraints to be objectively evaluated. The scale and extent of this development on Essex cannot be understated as this development will cause significant impact on the affected communities leaving them deeply concerned and fearful about the potential impacts. It is necessary for ECC, and its partner Local Authorities, to seek to ensure that these adverse impacts are minimised by the most appropriate choice of technology and detailed route planning, not simply the most economical solution for NG, or a route choice which is considered acceptable to without prior evidence gathering and engagement.

The discussion of offshore options in the Corridor and Preliminary Routeing and Siting Study Report (CPRSSR) are considered by ECC to be difficult to follow and not evidenced in terms of why the only offshore option to be progressed (as a separate project) is the Sea Link (Sizewell to Richborough). The constraints that have precluded taking forward offshore options of HVDC Cables for Norwich to Grain and Richborough to Sizewell, in conjunction with an AC Overhead line from Bramford to Tilbury (collectively Reinforcement Option East 12) are not readily apparent from the CPRSSR. Nor is it apparent why there is such a marked disparity in the cost benefit analysis between Option East 12 and NGET's preferred Option 7, when both include an offshore cable from Richborough to Sizewell and both include an Overhead line from Bramford to Tilbury. ECC remains concerned, as do our neighbours at Suffolk County Council, and as set out in their consultation response, that offshore options have been too readily discounted and excluded as options going forward without the necessary evidence. This is considered a significant omission to the proper planning of this DCO project.

ECC retains the strongly held view that that more comprehensive and cohesive evidence is required to show that an offshore link or links is not a feasible nor a desirable alternative. ECC remains unconvinced that the current submission provides an adequate explanation of NG's reasoning for discounting a more extensive offshore solution.

For example, the CPRSSR does not set out in simple understandable terms what an offshore maximum counterfactual scenario might look like, nor indeed goes it go far enough in setting out the rationale as to why this cannot be achieved. Furthermore, it does not take into account the forthcoming Holistic Network Design or the revised Network Options Assessment, which is due to be published at the end of June 2022 and which follows this consultation period. Hence ECC requests that this material is sent out after the end of June 2022, to provide a clear rationale as to whether and if so why is it suggested that the option of a maximum offshore alternative no longer remains as ECC believe that it should for the demonstrable benefits it would include.

Like other Authorities along the route, ECC consider that the scheme as it stands appears to be imposed on the host communities without the appropriate evidence. Which, it is considered, goes against the way DCO's should be properly planned for.

This DCO submission will be considered under the Town and Country Planning Act 2008. The relevant policy framework (which is not the Local Plans) is set out in the National Policy Statements (NPS), specifically EN1- Overarching Energy NPS (2011 and with recent draft) and EN-5 – Energy Transmission and Distribution Networks.

In addition, NG has to comply with the "Holford Rules" which in turn provide the guidelines for the routing of new overhead lines and were originally set out in 1959. These guidelines, intended as a common-sense approach to overhead line route design, were reviewed and updated by the industry in the 1990's. The NPS requires that they should be embodied in developers' proposals for new overhead lines.

Put briefly such rules set out that the following should be applied:

- Avoid altogether, if possible, the major areas of highest amenity value, by careful planning of the general route of the line in the first place, even if total mileage is somewhat increased in consequence
- Avoid smaller areas of high amenity value or scientific interest by deviation, provided this can be done without using too many angle towers, i.e., the bigger structures which are used when lines change direction other things being equal, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers
- Choose tree and hill backgrounds in preference to sky backgrounds wherever possible. When a line has to cross a ridge, secure this opaque background as long as possible, cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees
- Prefer moderately open valleys with medium or moderate levels of tree cover where the apparent height of towers will be reduced, and views of the line will be broken by trees
- Where country is flat and sparsely planted, and unless specifically preferred otherwise by relevant stakeholders, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration of lines or 'wirescape'
- Approach urban areas through industrial zones, where they exist; and when pleasant residential and recreational land intervenes between the approach line and the substation, carefully assess the comparative costs of undergrounding.

When the current scheme is considered against the above it is questionable if the current as proposed route meets the above in totality. It is acknowledged that some areas of high amenity value are avoided with some mitigation being proposed, particularly in the areas immediately within the Stour Valley AONB. Nevertheless, the entire route is of such value with the landscape being open, heavily populated, and hugely sensitive to change that EAG's lasting impact will be seriously detrimental to the Essex countryside.

ECC wishes to comment on the route as submitted in the non-statutory consultation. However, the comments which follow are predicated by the fact that ECC reserve the right to make any additional comments as it sees fit and relevant to the scheme as it develops.

ECC will continue to work in partnership with affected Authorities in Essex, Suffolk and Norfolk and its partners Place Services as the DCO develops.

ECC recognises the recent growth of large-scale energy developments within the region and invite National Grid to enter into a much closer dialogue with ECC, other affected councils and relevant parties to discuss coordination of project delivery as well as the exploration of opportunities for the sharing of assets / infrastructure so as to minimise the physical impacts of growth on the communities.

ECC notes the government's intention to consult on the delivery of community benefits from energy developments and encourage National Grid to engage with officers to provide a proactive position in respect of community benefits.

It is recognised that the as proposed link will be undergrounded where adopted National Policy indicates it should be, these being specifically within the area in Essex shown as the Dedham Vale and Stour Valley Area of Outstanding Natural Beauty (AONB). This makes up the first part of the Essex link where it enters Braintree before returning overground close to the Tendring border.

However, there is considerable concern with the route taking the path as shown on the proposals at this time. Taking the route overground in this location will result in a sealing end compound, then overhead lines down to a substation close to the Lawford substation, before returning north on another cable array to enter Colchester. This effectively means this link will see a proliferation of overhead lines which will provide a seriously detrimental visual impact and feeling of enclosure to the adjacent communities, effectively from Ardleigh to the Lawford substation. The landscape here is flat and open dominated by agriculture and interspersed with settlement and properties; a proliferation of overhead lines here is considered completely unacceptable.

ECC fully supports the comments as made in consultation by the Dedham Vale AONB Project Board and Suffolk County Council in asking for undergrounding of the lines as they leave Suffolk and the AONB and approach the Lawford substation because of the potential impact upon the Dedham Vale AONB and the local residents close to the proposed substations in Lawford and Ardleigh who would be effectively "boxed in" by lines travelling both to and from Lawford substation.

In addition, it is considered necessary to underground the lines as they leave Lawford substation in their return towards Colchester and the A12 because of the potential impact otherwise on the Dedham Vale AONB and the residents close to the proposed substations who would again be "boxed in" by overhead lines travelling both to and from Lawford substation. Such comments are consistent with the response by Suffolk CC and the Dedham Vale AONB Project Board, and would also remove any potential conflict to the flying activities at the nearby historic Boxted airfield

The route is then taken to the north, and enters Colchester at a restricted pinch point to the north of Ardleigh where the Dedham Road meets Fen Lane, before turning east to meet the A12 north of Colchester. Here the chosen corridor is very narrow. This will severely restrict the ability of the proposal to be adequately screened and its impact mitigated against causing an overbearing feeling of enclosure within this area. ECC consider that this this apparent proliferation of doubling up of overhead lines and the sharp changes of direction as proposed do not comply with the Holford Rules.

It is not understood why the NSIP route needs to be taken into Tendring. Whilst it is acknowledged that this is to potentially pick up the connection point from the current as proposed North Fall and Five Estuaries Wind Farms, which are live NSIPs, why does this connection point, which will reach Lawford by means of an underground link, have to be here? Moving this to the west towards north Colchester would negate the need for this link, effectively removing its impact and potentially reduce costs.

If this cannot be achieved then ECC remain of the view that due to the impact of the development in this area the entire link from the Stour Valley AONB, to Lawford, then back out around Ardleigh to Colchester should be placed undergrounded in its entirety. National Grid have an obligation as set out in the current Overarching National Policy Statement for Energy (EN-1) as well as the emerging Draft to look to conserve landscapes and local communities where the impact of overhead lines is acute, and this is considered wholly relevant in this location and applicable to this part of the route.

If it is that this line comes forward ECC, support the conclusions made by Suffolk County Council in removing the line which crosses Dedham Vale in the AONB as this would be superfluous to need if EAG progresses, and the impacts on removing this from Dedham would be significant in respect of landscape and heritage impacts.

The route corridor contains a number of particular constraints including, but not limited to the following:

- Where the route crosses the A127 it passes over the allocated mixed use new settlement which is an important growth site in the recently adopted Brentwood Local Plan This new settlement is entitled Dunton Hills Garden Village which has an allocated Garden Community for over 4,000 homes, jobs and schools etc and is a key quality development supporting the delivery of housing growth.
- Where the route passes over the A129 (between Woodland School and The Meskin Hutton) this is an area that locally is considered to be of high if not equivalent to an Area of Outstanding Natural Beauty and forms the only green break/wedge in between what is a continuous strip of housing.
- The current proposed route is close to a high number of historic buildings, including but not limited to Margaretting Hall Fryerning Hall and Ingatestone Hall amongst others creating a high degree of visual impact and intrusion and loss of amenity and important historical setting in an otherwise tranquil rural area.



- The route corridor shows close proximity to Broomfield Hospital which includes an air ambulance facility and safe landing could be impeded by nearby pylons.
- Close to the preferred route are the Anglo-European Secondary School, Ingatestone, Fryerning Infant and Junior Schools and Woodland School in Hutton.
- To the north of Chelmsford, the route corridor stands very close to former landfill sites.
- The route crosses through an area in Braintree which has been identified as a Climate Action Zone by the Independent Essex Climate Action Commission. The route also crosses the preferred proposed new route of a dual A120 known as route D. It should also be noted that a proposal for a 35m incinerator chimney at Rivenhall Airfield here was rejected by Essex County Council on grounds of landscape impact. These proposals are for a series of 50m pylons, and therefore the likely significant landscape impact is clear to see. The Council would therefore expect that the impact of the proposed transmission route be carefully considered in light of other existing and proposed developments in the vicinity of it as its cumulative impact and not in isolation.
- The impact the route would have on the character of the Essex Landscape including the Dedham Vale and Stour Valley AONB, the Can and Wid river valleys, the Heybridge Wooded Farmland Plateau, and the Upper Chelmer Valley, amongst others.
- Its unproven and awkward coalescence with the major infrastructure network including national rail and the strategic road network.

What follows in the following Appendixes are the comments as received covering a wide range of our statutory functions.

If you require further information or clarification on any points raised in this response please contact the case officer, their details are set out below.

Yours Sincerely,

*Graham Thomas.*

Graham Thomas  
Head of Planning and Sustainable Development

Enquiries to: Mark Woodger  
Principal Planner, Growth and Development

## Appendix One

### **Community benefits**

ECC notes the government's intention to consult on the delivery of community benefits from energy developments and encourage National Grid to engage with officers to provide a proactive position in respect of community benefits.

ECC believe that the impacts and disturbance placed on local communities by the construction and operation of onshore transmission networks cannot be adequately dealt with through the planning system and it is necessary for National Grid to provide a voluntary Community Benefit Contribution (CBC) package to host local communities. The CBC package would recognise the role of local communities that are being asked to host nationally significant infrastructure projects that will contribute significantly to the government's commitment to Net Zero and energy security.

ECC would welcome the opportunity to work with National Grid to establish a CBC package, which:

- Provides a clear and transparent framework which formally commits to the concept of a CBC package as part of the East Anglia Green project.
- Addresses the inherent inconsistency between renewable and low carbon energy generation with onshore transmission network projects for host communities.
- Reflects the overall scale, nature and national significance of the East Anglia Green project and the particular local needs and circumstances of the host communities.
- Provides short and long-term benefits to host communities, reflecting the longevity of onshore transmission networks.

ECC will look to, and work with the National Grid to set up and the NG to financially support an Environmental Improvement Fund to be used on local initiatives, such as the provision of community woodlands, tree and hedgerow planting, the establishment of traditional orchards and the enhancement of wildlife habitats. Community groups, parish councils and voluntary sector organisations would be encouraged to make applications to this fund. ECC would welcome further discussions to explore opportunities to secure benefits for the host communities arising from the development.

ECC considers that, notwithstanding embedded mitigation and potential modifications to the scheme as proposed above, it is unavoidable for the development to result in serious and lasting negative residual impacts on the community and locality, including on amenity, loss/reduced quality of recreational opportunity for the community, tourism, culture and heritage, and health and wellbeing. ECC expects appropriate and robust mitigation for such residual impacts, which could be, for example, include but not be limited to, funding for alternative outdoor recreational offers, access and amenity improvements, green space, cultural and heritage enhancements.

## **Health and Wellbeing**

ECC is working in close partnership with the NHS, CCG and the Blue Light Emergency Services on all NSIPs and therefore supports the comments as are made by the same on this consultation.

ECC consider it necessary that the EAG project includes the submission of a detailed Construction Management Plan (CMP) to mitigate and compensate against any as proposed construction impact on health and wellbeing. The CMP should have regard to BS 5228:2009 Code of Practice of Noise and Vibration Control on Construction and Open Sites.

It is necessary that an appropriate noise assessment to be undertaken, will need to address the construction phases of the proposal and the operational noise. Methodology of the aforementioned assessment shall be to be agreed once specific details of the proposal are known. A lighting assessment will also be necessary.

A site-specific risk assessment will be required which should include calculations of the maximum possible levels of non-ionizing radiation at the nearest residential properties at various floor levels. The values obtained shall then be compared to the current guidelines of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) limits for exposure to electromagnetic radiation. The levels quoted shall be during operation at maximum capacity/power. A valid ICNIRP certificate must also be submitted.

It is considered that overhead power lines do give potential to raise electric and magnetic fields which fall off with distance. Burying power lines underground effectively shields the electric fields but less so the magnetic and it is the latter that have given rise to most health issues which are a major concern for the multitude of residents and communities that are affected by these proposals. There are good aesthetic and practical reasons for replacing overhead power lines by underground ones. However undergrounding power lines in response to health concerns could be considered a precautionary measure.

Appropriate studies need to be presented and evidenced on the impacts of electromagnetic fields above certain levels and biological effects, adult and childhood illness.

## **Climate Change**

ECC acknowledges that there is demand for renewable energy generation and recognises the legal obligation to achieve net zero emissions by 2050. In addition, it acknowledges the Government's stated position that the UK's economic recovery from the COVID-19 pandemic should prioritise the delivery of low carbon projects.

ECC is committed to taking action on climate change and as part of this supports proposals that seek to increase the amount of renewable energy generated in Essex and reduce carbon emissions from the electricity grid subject to other planning considerations such as landscape and visual impact and impact on local communities provided there are no significant adverse environmental impacts that cannot be managed and/or mitigated.

ECC welcomes National Grid's Future Energy Scenarios and highlighting key critical areas of improvement within the existing electricity infrastructure, to ensure a smooth transition to a low carbon and net zero future. As mentioned in the East Anglia Green project document handbook, the east of England will be a prime location and crucial for meeting Government's targets for net zero.

Firstly, it is important to note since the publication of the document, Government have published "The Energy Security Strategy". This has included updates to several key targets, perhaps the most critical one relating to this work, is 50 GW of offshore wind by 2030. With this new target in mind, reconsideration must be given to its impact on these proposals, with potential new capacity being added to the East of England, and how it affects the feasibility of all the options considered within the proposals.

Secondly, it is noted that there will be significant onshore reinforcement of approximately 60km of overhead transmission lines between Norwich main and Bramford and 120 km of overhead transmissions lines between Bramford and Tilbury, via the Tendring peninsula. The project as proposed will utilise overhead steel lattice pylons. With steel manufacture being incredibly carbon intensive, questions must be raised about the overall carbon impact of this project including embodied carbon. It must be made clear how National Grid will account, report, and mitigate the emissions brought about by delivery of this project in whole life terms, both operational and embodied carbon. Furthermore, further detail must be provided that takes account of scope 1, 2 and 3 carbon emissions for the project.

Additionally, work carried out on this scale, across the existing network infrastructure in Essex, will likely cause some disruption. Further detail is needed on how this may affect the transmission and distribution grid in terms of renewable energy additionality in the short term, especially given the recommendations set out by the Essex Climate Action Commission, with significant carbon reductions being modelled for 2030 and beyond. Moreover, with current energy markets being exceptionally volatile, renewable energy can provide robust resilience to customers affected by market forces. Thus, it has been noted that the indicative timeline for delivery and completion of this project will be in 2031, is there a way to accelerate this timeline, in view of the above goals and drivers, should consent be given.

We note that National Grid are running an innovation project in conjunction with SSE, on harnessing waste energy from transformers. It is stated that this has the potential to save millions of tonnes of carbon dioxide emissions. Will this innovative technology be available for the new substations planned for as part of the EAG project? There are several projects regarding upgrading the grid infrastructure, at various stages in the planning process in this region, submitted by National Grid. What synergy will exist between them, in terms of learning and delivery to ensure that these projects are completed in an efficient, environmentally friendly manner.

For the proposal A Whole Life Carbon (WLC) assessment should be carried out, and mitigation measures to reduce the emissions put forward and evaluated. A WLC assessment would cover both operational and embodied carbon emissions which are described below:

- Operational emissions – for example this would include the emissions from the maintenance practices and vehicles used, and a mitigation measure which would help tackle this would be a proportion (or all) of vehicle movements to be electric.

- Embodied emissions – this would include the materials used in the construction process, and the transportation used in the construction process as an example. Mitigation measures that could be explored would review the materials used to see if there were alternatives that have a lower carbon intensity, and also evaluate where the materials come from in order to minimise the distance travelled and by what method of transport is used for example. There is a growing body of guidance for assessing embodied emissions which could be adapted to this project, the following link being one <https://www.oneclicklca.com/> which provides a number of tools through varying levels of detail.

Residual emissions caused as a result of the project should be properly mitigated. In doing so priority should be given to reducing emissions at source, but the residual emissions should then be offset by delivering local carbon offsetting projects. In doing so full range of options should be looked at, for example local retrofitting programmes, new renewable energy installations, significant tree-planting and habitat creation measures. If such green/blue infrastructure projects were used, these should be in addition to the measures required to mitigate any biodiversity and other GI impacts, and as mentioned in the following section.

The opportunity to deliver other climate-related co-benefits of the project should be explored in order to make best use of the infrastructure being put in place. For example, educational benefits could be delivered in terms of education information boards at suitable locations, and school workshops etc, explaining the role of the project in delivering a decarbonised national grid, UK energy security, strategy and tackling climate change

### **Green Infrastructure (GI)**

Whilst there are no statutory requirements for GI, Government's 25 Year Environment Plan and Environment Act (2021) place significant importance on protecting and enhancing GI, accessibility, and biodiversity net gain.

Having reviewed the and the associated documents which accompanied the planning application, ECC raise the following points.

### **Biodiversity Net-Gain**

At present, the Environment Act identifies a minimum 10% gain required in biodiversity. The Environment Bill received Royal Assent on 9 November 2021, meaning it is now an Act of Parliament. At present mandatory biodiversity net gain is likely to become law in Winter 2023 including the following key components:

- *Minimum 10% gain required calculated using Biodiversity Metric and approval of net gain plan*
- *Habitat secured for at least 30 years via obligations/ conservation covenant*
- *Habitat can be delivered on-site, off-site or via statutory biodiversity credits*
- *There will be a national register for net gain delivery sites*
- *The mitigation hierarchy still applies of avoidance, mitigation and compensation for biodiversity loss*
- *Will also apply to Nationally Significant Infrastructure Projects (NSIPs)*
- *Does not apply to marine development*

- *Does not change existing legal environmental and wildlife protections*

The following guidance has already been produced to assist the calculation and delivery of biodiversity net gain:

- an updated [Biodiversity Metric 3.1](#) was published in April 2022.
- CIEEM, IEMA and CIRIA have set out [Good Practice Principles for Development](#) and an associated [Practical Guide](#) and [Case Studies](#).
- a British Standard on biodiversity net gain and development projects: [BS 8683:2021 Process for designing and implementing Biodiversity Net Gain](#)

ECC will look to ensure this proposal delivers a minimum of 10% Biodiversity Net-Gain (BNG) in line with the Environment Act. GI features located within the preferred option corridors ought to be protected and retained, where possible, to support the delivery of BNG. However, it is recognised that this might not always be conceivable, and off-site BNG delivery can provide additional benefits and be used to protect areas of land that are of local natural and wildlife value.

### Existing Landscape Assets

ECC expects this proposal, where possible, to protect and retain green and blue infrastructure features. Moving forward, we recommend a GI Audit is completed to outline and access the existing site GI within the preferred option corridors. Any existing GI needs to be incorporated as a part of the route design wherever possible, with strongly worded commitments made for the retention of these features. Where the removal of high value GI is unavoidable, a suitable location will need to be identified for the GI to be replaced to an equal or enhanced standard.

### Ancient Woodland

The preferred option corridor includes multiple patches of ancient woodland of varying sizes. Paragraph 5.4.13 of the Overarching National Policy Statement for Energy (EN-1) states that *“the secretary of state should not grant development consent for any development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location clearly outweigh the loss of the woodland habitat”*. ECC recommends that the EAG proposal refers to the appropriate landscape buffers, and that the preferred option corridor is designed and planned to avoid detrimental direct and indirect impacts. This includes, the risk of water-borne pollution, air pollution, dust deposit, change to local hydrology, increased recreational pressure and informal access points and soil compaction.

### Local Wildlife Sites

No reference is made to Local Wildlife Sites (LWSs) in the documentation provided. LWSs are wildlife-rich sites selected for their local nature conservation value and can contain important, distinctive, and threatened habitats and species. Moving forward, the proposal should seek to minimise the impact on these sites.

### GI Strategy

Moving forward, ECC would ask for the production of a Green Infrastructure Strategy for the route, based on the Essex Green Infrastructure Strategy (2020) and Emerging GI Standards to provide a more detailed an assessment of the ecological context of the development. The scheme should include but not be limited to:

- The design of the development to deliver Biodiversity Net Gain and wider environmental net gain. This that forms an important component of nature recovery networks and the wider landscape scale GI network.
- A Green Infrastructure Plan outline the implementation of green infrastructure across the proposed preferred option corridor, the timescale for the implementation of each aspect and, the details of the quality standard of construction, management and maintenance that will occur.

### Essex GI Strategy and Standards

Consideration should be given to the use of the [Essex Green Infrastructure Strategy \(2020\)](#) and emerging [Essex Green Infrastructure Standards](#) in securing multifunctional green infrastructure. ECC is also establishing a Local Nature Partnership (LNP) covering Greater Essex along with a Local Nature Recovery Strategy. The works of this group should be supported and acknowledge moving forward.

### **Minerals and Waste**

The 'application site' forms the basis for the minerals and waste safeguarding assessment set out below.

This response deals with mineral policy matters and waste policy matters in turn. A spatial representation of the application site and the matters discussed can be found in Appendix Two. A list of relevant designations and specific facilities which would potentially be affected are listed, with their most recent planning application reference where relevant, in Appendix Three. There then follows comments relating to the East Anglia Green Energy Enablement Corridor and Preliminary Routeing and Siting Study Report, 2022.

### **Mineral Matters**

#### **Safeguarding Mineral Resources**

A significant proportion of the proposals are located across land which is designated as a Mineral Safeguarding Area (MSA) and therefore the application is subject to Policy S8 of the Essex Minerals Local Plan 2014 (MLP). The MLP can be viewed on the County Council's website via the following link:

<https://www.essex.gov.uk/minerals-waste-planning-policy/minerals-local-plan>

Policy S8 of the MLP requires that a non-mineral proposal located within an MSA which exceeds defined thresholds must be supported by a Minerals Resource Assessment to establish the existence, or otherwise, of a mineral resource capable of having economic

importance. This will ascertain whether there is an opportunity for the prior extraction of that mineral to avoid the sterilisation of the resource, as required by the National Planning Policy Framework (Paragraph 210). The NPPF requires policies that encourage the prior extraction of mineral where it is practical and environmentally feasible.

The area of land associated with the proposed development that lies within an MSA for sand and gravel exceeds the 5ha threshold upon which local resource safeguarding provisions are applied for this mineral. Part of the application site also falls within a MSA for brick clay and exceeds the threshold of one dwelling for this mineral. These thresholds are defined in Policy S8 of the MLP. Policy S8 of the MLP therefore applies, and this states “... *Proposals which would unnecessarily sterilise mineral resources or conflict with the effective workings of permitted minerals development or Preferred Mineral site allocation shall be opposed.*”

**Therefore, a Minerals Resource Assessment (MRA) is required as part of a planning application** to establish the practicality and environmental feasibility of the prior extraction of mineral such that the resource is not sterilised where this can be avoided. If found to be practical and environmentally feasible, prior extraction is expected to take place ahead of sterilisation by non-mineral development.

The relationship between the sand and gravel MSA and the application site is shown in Appendix Two.

The scope and level of detail of a Minerals Resource Assessment will be influenced by the specific characteristics of the site’s location, its geology, and the nature of the development being applied for. However, a number of key requirements can be identified which are likely to satisfy the MWPA that the practicality and environmental feasibility of prior extraction have been suitably assessed in the MRA. The detail to be provided should be in proportion to the nature of the proposed application. The MWPA welcomes early engagement to clarify the requirements of MRA.

<b>Minerals Impact Components</b>	<b>Infrastructure Assessment</b>	<b>Information requirements &amp; sources</b>
Site location, boundaries and area		Application site area in relation to safeguarded site(s), Description of proposed development, Timescale for proposed development,
Description of infrastructure potentially affected		Type of safeguarded facility e.g. wharf, rail depot, concrete batching plant; asphalt plant; recycled aggregate site, Type of material handled/processed/supplied, Throughput/capacity.
Potential sensitivity of proposed development as a result of the operation of existing or allocated		Distance of the development from the safeguarded site at its closest point, to include the safeguarded facility and any access routes,



safeguarded infrastructure (with and without mitigation)	<p>The presence of any existing buildings or other features which naturally screen the proposed development from the safeguarded facility,  Evidence addressing the ability of vehicle traffic to access, operate within and vacate the safeguarded development in line with extant planning permission,  Impacts on the proposed development in relation to:</p> <ul style="list-style-type: none"> <li>• Noise</li> <li>• Dust</li> <li>• Odour</li> <li>• Traffic</li> <li>• Visual</li> <li>• Light</li> </ul>
Potential impact of proposed development on the effective working of the safeguarded infrastructure/allocation	Loss of capacity – none, partial or total, Potential constraint on operation of facility – none or partial.
Mitigation measures to be included by the proposed development to reduce impact from existing or allocated safeguarded infrastructure	External and internal design & orientation e.g. landscaping; living & sleeping areas facing away from facility, Fabric and features e.g. acoustic screening & insulation; non-opening windows; active ventilation.
Conclusions	How the MIIA informed the final layout of the proposed development. Potential sensitivity of proposed development to effects of operation of the safeguarded infrastructure/facility and how these can be mitigated satisfactorily; or If loss of site or capacity, or constraint on operation, evidence it is not required or can be re-located or provided elsewhere.

An MRA is expected to be evidence based and informed by quantified information.

To ensure that a comprehensive assessment of the mineral resource at risk of sterilisation is undertaken, it is recommended that:

- Any questions regarding the scope of an MRA are discussed with the MWPA as early as possible.
- A draft borehole location plan is agreed prior to commencement, and preferably as part of pre-application.
- The borehole depths should be sufficient to prove the depth of the safeguarded deposit.
- Borehole analysis must note the depth of the water table.

- A non-stratified sampling technique is applied. An initial spacing of approximately 100m-150m centre to centre should be considered, with additional locations if required to determine the extent of deposits on site; and
- The MRA provides documented evidence confirming any commercial interest in working the resource at risk of sterilisation based on its quality, quantity, and viability of prior extraction.

The MRA should be prepared using the [Pan-European Standard for Reporting of Exploration Results, Mineral Resources and Reserves \(PERC\) Standard](#), which was revised and published on 23 May 2013.

Any application, through a MRA or otherwise, is required to be submitted with sufficient information such that the issues raised through Policy S8 of the MLP can be appropriately considered.

### **Safeguarding Mineral Infrastructure**

The application site passes through a number of Mineral Consultation Areas as shown in Appendix Two and listed in Appendix Three. With regard to Mineral Consultation Areas, Policy S8 of the MLP seeks to ensure that existing and allocated mineral sites and infrastructure are protected from inappropriate neighbouring developments that may prejudice their continuing efficient operation or ability to carry out their allocated function in the future. Policy S8 of the MLP defines Mineral Consultation Areas as extending up to 250m from the boundary of an infrastructure site or allocation for the same.

Paragraph 187 of the NPPF states that “Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”

**Due to the proposed project passing through Mineral Consultation Areas, a Mineral Infrastructure Impact Assessment (MIIA) is required as part of a planning application.** The MWPA has designed a generic schedule of information requirements that should be addressed as relevant through an MIIA. The detail to be provided should be in proportion to the nature of the proposed application.

### **Mineral Infrastructure Impact Assessment Components**

<b>Waste Infrastructure Assessment Components</b>	<b>Information requirements &amp; sources</b>
Site location, boundaries and area	<ul style="list-style-type: none"> <li>• Application site area in relation to safeguarded site(s)</li> <li>• Description of proposed development</li> <li>• Timescale for proposed development</li> </ul>

Description of infrastructure potentially affected	<ul style="list-style-type: none"> <li>• Nature of relevant safeguarded facility</li> <li>• Type of material handled/processed/supplied</li> <li>• Throughput/capacity</li> </ul>
Potential sensitivity of proposed development as a result of the operation of existing or allocated safeguarded infrastructure	<ul style="list-style-type: none"> <li>• Distance of the development from the safeguarded site at its closest point, to include the safeguarded facility and any access routes.</li> <li>• The presence of any existing buildings or other features which naturally screen the proposed development from the safeguarded facility</li> <li>• Evidence addressing the ability of vehicle traffic to access, operate within and vacate the safeguarded development in line with extant planning permission.</li> <li>• Impacts on the proposed development in relation to: <ul style="list-style-type: none"> <li>○ Noise</li> <li>○ Dust</li> <li>○ Odour</li> <li>○ Traffic</li> <li>○ Visual</li> <li>○ Light</li> </ul> </li> </ul>
Potential impact of proposed development on safeguarded infrastructure/ allocation	<ul style="list-style-type: none"> <li>• Loss of capacity – none, partial or total</li> <li>• Potential constraint on operation of facility – none, partial or full</li> </ul>
Measures to mitigate potential impacts of operation of infrastructure on proposed development	<ul style="list-style-type: none"> <li>• External and internal design &amp; orientation eg landscaping; living &amp; sleeping areas facing away from facility.</li> <li>• Fabric and features e.g. acoustic screening &amp; insulation; non-opening windows; active ventilation</li> </ul>
Conclusions	<ul style="list-style-type: none"> <li>• Sensitivity of proposed development to effects of operation of safeguarded infrastructure/facility can be mitigated satisfactorily; or</li> <li>• If loss of site or capacity, or constraint on operation, evidence it is not required or can be re-located or provided elsewhere</li> </ul>

A MIIA is expected to be evidence based and informed by quantified information. It is recognised that the requirements of an MIIA may be addressed through other evidence base documents, such as those addressing transport, odour and noise issues. In these instances, it would be acceptable for the MIIA to signpost to the relevant section of complementary evidence supporting the planning application. The MWPA welcomes early engagement to clarify the requirements of MIIA.

## **Waste Matters**

### **Safeguarding Waste Infrastructure**

The application site passes through a number of Waste Consultation Areas as shown in Appendix Two. Its location within these Waste Consultation Areas means that an application would be subject to Policy 2 of the Essex and Southend-on-Sea Waste Local Plan 2017 (WLP). The WLP can be viewed on the County Council’s website via the following link:

<https://www.essex.gov.uk/minerals-waste-planning-policy/waste-local-plan>

Policy 2 of the WLP seeks to ensure that existing and allocated waste sites and infrastructure are protected from inappropriate neighbouring developments that may prejudice their continuing efficient operation or ability to carry out their allocated function in the future. Policy 2 defines Waste Consultation Areas as extending up to 250m from the boundary of existing or allocated waste infrastructure, unless they are Water Recycling Centres, where the distance increases to 400m.

**Due to the proposed project passing through a Waste Consultation Area, a Waste Infrastructure Impact Assessment (WIIA) is required as part of a planning application.** In order to satisfy the provisions of Policy 2, the MWPA has designed a generic schedule of information requirements that should be addressed as relevant within the supporting evidence of any application which falls within a Waste Consultation Area. The detail to be provided should be in proportion to the nature of the proposed application.

### Waste Infrastructure Assessment Components

Waste Infrastructure Assessment Components	Information requirements & sources
Site location, boundaries and area	<ul style="list-style-type: none"> <li>• Application site area in relation to safeguarded site(s)</li> <li>• Description of proposed development</li> <li>• Timescale for proposed development</li> </ul>
Description of infrastructure potentially affected	<ul style="list-style-type: none"> <li>• Nature of relevant safeguarded facility</li> <li>• Type of material handled/processed/supplied</li> <li>• Throughput/capacity</li> </ul>
Potential sensitivity of proposed development as a result of the operation of existing or allocated safeguarded infrastructure	<ul style="list-style-type: none"> <li>• Distance of the development from the safeguarded site at its closest point, to include the safeguarded facility and any access routes.</li> <li>• The presence of any existing buildings or other features which naturally screen the proposed development from the safeguarded facility</li> <li>• Evidence addressing the ability of vehicle traffic to access, operate within and vacate the safeguarded development in line with extant planning permission.</li> </ul>

	<ul style="list-style-type: none"> <li>• Impacts on the proposed development in relation to: <ul style="list-style-type: none"> <li>○ Noise</li> <li>○ Dust</li> <li>○ Odour</li> <li>○ Traffic</li> <li>○ Visual</li> <li>○ Light</li> </ul> </li> </ul>
Potential impact of proposed development on safeguarded infrastructure/ allocation	<ul style="list-style-type: none"> <li>• Loss of capacity – none, partial or total</li> <li>• Potential constraint on operation of facility – none, partial or full</li> </ul>
Measures to mitigate potential impacts of operation of infrastructure on proposed development	<ul style="list-style-type: none"> <li>• External and internal design &amp; orientation eg landscaping; living &amp; sleeping areas facing away from facility.</li> <li>• Fabric and features eg acoustic screening &amp; insulation; non-opening windows; active ventilation</li> </ul>
Conclusions	<ul style="list-style-type: none"> <li>• Sensitivity of proposed development to effects of operation of safeguarded infrastructure/facility can be mitigated satisfactorily; or</li> <li>• If loss of site or capacity, or constraint on operation, evidence it is not required or can be re-located or provided elsewhere</li> </ul>

A WIIA is expected to be evidence based and informed by quantified information. It is recognised that the requirements of a WIIA may be addressed through other evidence base documents, such as those addressing transport, odour and noise issues. In these instances, it would be acceptable for the WIIA to signpost to the relevant section of complementary evidence supporting the planning application. The MWPA welcomes early engagement to clarify the requirements of WIIA.

**Site Waste Management Plan**

Paragraph 8 of the NPPF recognises the importance of “using natural resources prudently and minimising waste” to ensure the protection and enhancement of the natural environment and to achieve sustainable development. It also reiterates the need to mitigate and adapt to climate change and move towards a low carbon economy. An efficient and effective circular economy is important to achieving these objectives.

Policy S4 of the Minerals Local Plan (2014) advocates reducing the use of mineral resources through reusing and recycling minerals generated as a result of development/ redevelopment. Not only does this reduce the need for mineral extraction, it also reduces the amount sent to landfill. Clause 4 specifically requires “The maximum possible recovery of minerals from construction, demolition and excavation wastes produced at development or redevelopment sites. This will be promoted by on-site re-use/ recycling, or if not

environmentally acceptable to do so, through re-use/ recycling at other nearby aggregate recycling facilities in proximity to the site.”

It is vitally important that the best use is made of available resources. This is clearly set out in the NPPF and relevant development plan documents. We would therefore recommend that, in lieu of these issues being addressed prior to a decision, conditions are attached to require the applicant to prepare an appropriately detailed waste management strategy through a Site Waste Management Plan.

A SWMP would be expected to:

- Present a site wide approach to address the key issues associated with sustainable management of waste, throughout the stages of site clearance, design, construction and operation,
- Establish strategic forecasts in relation to expected waste arisings for construction,
- Include waste reduction/recycling/diversion targets, and monitor against these,
- Advise on how materials are to be managed efficiently and disposed of legally during the construction phase of development, including their segregation and the identification of available capacity across an appropriate study area.

### **East Anglia Green Energy Enablement Corridor and Preliminary Routeing and Siting Study Report, 2022**

ECC is pleased to note that the EAG Enablement Corridor and Preliminary Routeing and Siting Study Report, 2022 (PRSS) through its appendices recognises the role of the Essex Minerals Local Plan 2014 and the fact that the proposed development has implications for the safeguarding of mineral resources and mineral development. It is noted that the PRSS further recognises that the proposed development has implications for the safeguarding of waste development although it is noted that there is no reference to the Essex and Southend-on-Sea Waste Local Plan 2017. This is an omission and references should be added to this document where relevant.

With respect to the safeguarding of mineral resources, the PRSS states, with respect to the Bramford to EAC Options Selection at Paragraph 5.5.20, that *‘the corridors all pass through areas either allocated for minerals extraction or waste sites. As these county designations (Supplementary Note 3) are common they are not considered to be a differentiator in the selection of a preferred corridor.’* This is questioned to the extent that where routes would have less impact on safeguarded mineral resources or infrastructure, then this should be carried through into relevant assessments. This is particularly the case when potential impacts on existing, permitted or allocated minerals and/ or waste infrastructure are being assessed as the contribution these facilities make to the strategic issues of minerals supply and waste management form part of a County’s long-term strategy with regards to these issues. It is also clarified that although these county designations may be ‘common’, that this does not obviate the need to comply with relevant minerals and waste policy.

The Appendices associated with the PRSS go into more detail with regards to individual sections of the proposed route. The assessments of individual sections of the route

contain both generalised and bespoke statements with regards to minerals and waste safeguarding as considered appropriate for the context of each section.

With regard to safeguarded mineral resources, it is often stated in the report something similar to *'Much of the section would fall within areas of minerals safeguarding (sand and gravel) under the Essex Minerals Local Plan (for the areas of the section falling within (X) and (Y)...'* *Safeguarding ensures protection of mineral resources from risk of sterilisation as the result of development.'* The PRSS is however largely silent on the implications of this within Essex, which is set out in Section 'Mineral Matters – Safeguarding Mineral Resources' above. As also set out above, The MWPA would welcome the opportunity to discuss the scope of an MRA.

The PRSS further states that *'It is not considered that siting of pylons would cause significant sterilisation of any mineral resources due to the small pylon footprint, however, careful routeing and siting, and consultation with the relevant minerals planning authorities should help to avoid significant effects.'* The rationale behind this conclusion should be set out in an MRA as part of a future planning application such that this conclusion and any consultation with the MWPA on this matter is appropriately documented.

As shown in Appendix Two and Appendix Three, the proposed development falls within a number of MCAs and/ or WCAs. As set out under Mineral Matters – Safeguarding Mineral Infrastructure and Waste Matters – Safeguarding Waste Infrastructure, this triggers the need for a MIIA and/ or WIIA to be carried out based on the schedules identified above. As also set out above, the MWPA would welcome the opportunity to discuss the scope of MIIAs and WIAs.

The PRSS contains a number of bespoke sections recognising where particular sections of the overall route have potential implications for one or more allocated, permitted or active minerals and waste infrastructure. At this stage, the MWPA does not consider that it is proportionate to comment on these individually until the promoters have carried out initial MIIAs and WIAs to inform an assessment of potential impacts. It is noted that the PRSS have scoped in operations at Martells, Wivenhoe, Fingringhoe and Sandon. The MWPA notes that these facilities are all more than 400m away from the proposed route and therefore outside of Mineral Consultation Areas.

## **Archaeology**

**General Comments:** At present the high-level assessment has only considered designated heritage assets without any assessment of the Historic Environment Record data. This information will need to be considered in advance of the final route decision and as part of any proposed application and EIA. The cropmark data held on the HER will be important in assessing the location for the route, and especially the sub-station in Tendring. With the majority of the route proposed as overhead lines careful assessment of the Historic Environment Record should allow much of the known below ground heritage assets to be protected.

The proposed undergrounding section, due to the destructive impact on surviving archaeological deposits, will require advance evaluation prior to submission of the DCO

both in the form of geophysical assessment and trial trenching/bore hole assessment/palaeo-environmental assessment. As this area traverses a highly sensitive landscape which has been largely preserved from the medieval period, there is a high potential for both landscape features and below ground deposits to survive. Similarly, as this bisects the river valley there is a high potential for important palaeo-environmental deposits, as well as waterlogged deposits surviving in the valley.

**Section Specific Comments:**

The following table provides more specific comments by section:

Section	Comment
3.2.8	There is concern that the data retained within the Historic Environment Records has not been used to inform the constraint mapping. Any detailed design will need to include this detail.
3.3.7-8	This section identifies the fact that undergrounding has the potential for impact on archaeological deposits with the associated photos indicating the potential significant impact considering the land-take that is required. Large complex sites of heritage significance are frequently found on undergrounding projects and it is vital that these are identified as part of the initial phase of assessment so that an informed decision can be made by the inspector. An understanding of the significance and complexity of the archaeological deposits is important to have at the time of submission so that a clear and robust mitigation or preservation in situ strategy can be agreed.
5.2.7	Although the large Scheduled Monument is identified at Ardleigh this fails to understand that the important cropmark complex extends much further than the scheduled area and that similar and potentially as important deposits are located within the vicinity of Ardleigh. A similar situation occurs in many areas within the Stour Valley.
5.5.4	There are concerns that the presence of extensive cropmark complexes may not have been taken into consideration for the undergrounding elements.
5.5.4	There is no consideration of below ground archaeological deposits and the destruction and finite nature of the archaeological deposits.



Section	Comment
5.5.16 - 5.5.25	No mention is given of the significance of archaeological deposits destroyed or damaged by the undergrounding work.
5.5.26 and 5.5.27	In both cases the lack of assessment of the archaeological deposits/HER within this area is not identified. The loss of the archaeological deposits in this area will be a permanent impact.
6.5.5	There is no evidence that the consultants have assessed the data within the Historic Environment Record and historic environment impact seems to be restricted to where listed buildings are located.

## **Historic Buildings**

### **General Comments**

Whilst the following Built Heritage Advice relates solely to the proposals which fall within Essex, the scheme should be considered holistically when developing the proposals to ensure a high-quality project which is sympathetic to the historic built environment. The following advice is designed to inform the next steps in developing the proposals including the preparation of an Environmental Impact Assessment (EIA), and statutory consultations.

The EIA should include a Heritage Desk-Based Assessment (DBA), the objective of which is to identify all heritage assets which have the potential to be impacted by the proposals and which should therefore be taken forward for further assessment. A methodology for this should be provided and it is recommended that this is informed by *Historic Environment Good Practice Advice in Planning Note 12: Statements of Heritage Significance* and *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition)*, which provides for a staged approach to proportionate decision-taking as follows:

**Step 1:** Identify which heritage assets and their settings are affected

**Step 2:** Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

**Step 3:** Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it

**Step 4:** Explore ways to maximise enhancement and avoid or minimise harm

**Step 5:** Make and document the decision and monitor outcomes

In identifying which heritage assets and their settings may be affected (Step 1) it is recommended, given the scale and nature of the proposals, that a study area of 5km from the graduated swathe boundary is adopted. All heritage assets within this study area including Listed Buildings, Scheduled Monuments, Conservation Areas, Registered Parks and Gardens, and non-designated heritage assets should be identified.

The National Planning Policy Framework notes that the extent of a heritage asset's setting is not fixed and may change as the asset and its surroundings evolve. As such, heritage assets that are landmark buildings or buildings located on a higher topography may be situated outside of the study area but still require assessment. Therefore, it is recommended that a Zone of Theoretical Visibility (ZTV) is established. A ZTV overlaid with a Designations Map showing the location of all Listed Buildings, Scheduled Monuments, Conservation Areas, Registered Parks and Gardens, and non-designated heritage assets would be considered valuable in identifying those heritage assets which should be taken forward for further assessment.

Should it be determined that a heritage asset should be scoped out and not taken forward for further assessment, a clear and convincing justification for this should be provided.

Once all of the identified heritage assets which have the potential to be impacted by the proposals have been identified, the degree to which their settings and views make a contribution to the significance of the heritage assets or allow their significance to be appreciated, should be assessed (Step 2). This should seek to establish a heritage baseline for each asset.

The DBA should seek to demonstrate a sound understanding of historic use/land use and ownership, and identify which farm(s)/field(s) the heritage assets were historically and/or functionally associated with, in order to fully assess the impact of the proposals on the historic, architectural, and associative value of the heritage assets.

Furthermore, the views from and to each heritage asset should be carefully considered. The following would be considered valuable in establishing a heritage baseline:

- A ZTV overlaid with a Designations Map and a Viewpoint Location Plan, naming all Listed Buildings, Scheduled Monuments, Conservation Areas, Registered Parks and Gardens, and non-designated heritage assets

The methodology for the views and visual representations should be in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) and guidance notes provided by the Landscape Institute. It is further recommended that views be undertaken during winter months at a minimum, to reflect and consider the 'worst case scenario.' All viewpoints should be consulted and agreed.

The following publications and advice notes from Historic England are also useful guidance:

- Historic Environment Good Practice Advice in Planning 2: *Managing Significance in Decision-Taking in the Historic Environment*
- Historic Environment Good Practice Advice in Planning Note 3: *The Setting of Heritage Assets – (Second Edition)*
- Historic England Advice Note 7: *Local Heritage Listing – Identifying and Conserving Local Heritage (Second Edition)*
- Historic England Advice Note 10: *Listed Buildings and Curtilage*
- Historic Environment Good Practice Advice in Planning Note 12: *Statements of Heritage Significance*

Any heritage assets which are identified as being potentially impacted by the proposals should be taken forward for further assessment during which the effects of the proposed development, whether beneficial or harmful, on the significance of the heritage asset or on the ability to appreciate it, should be assessed (Step 3).

The third stage of any analysis is to identify the effects a development project may have on settings and to evaluate the resultant degree of harm or benefit to the significance of the heritage assets. Again, the guidance provided in *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition)* should inform the methodology for analysis.

Given the scale and nature of the proposals, it is recommended that the evaluation extend to include an assessment of cumulative impacts which may arise from other large-scale developments or similar schemes. Furthermore, complex impacts arising from the development which may not be solely visual should also be assessed.

Once the extent to which heritage assets are impacted by the proposals, through change within their setting, is fully understood, ways to maximise enhancement and avoid or minimise harm should be explored (Step 4). There may be design amendments which could mitigate any identified harm, and these should be carefully considered.

Should the proposals result in residual 'less than substantial' harm, despite mitigation efforts, then paragraph 202 of the NPPF would be a relevant consideration and the Local Planning Authority is required to make a balanced judgement between the level of harm and the public benefits.

Paragraph 199 should also be considered as this gives great weight to the conservation of heritage assets, as well as the statutory duty of Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 under which local planning authorities should have special regard to the desirability of preserving the settings of listed buildings and the character and appearance conservation areas.

## **Landscape**

Whilst the following Landscape Advice relates solely to the proposals which fall within the counties of Essex and Suffolk, the scheme should be considered holistically when developing the proposals to ensure a high-quality project which is sympathetic to the natural environment. The following advice is designed to inform the next steps in

developing the proposals including the preparation of an Environmental Impact Assessment (EIA).

### Current route and design

ECC have reviewed the Corridor and Preliminary Routeing and Siting Study Report and appendices as well as the Public Consultation Strategy (all National Grid, April 2022). This provides comments on the North East Anglia connection (Norwich to Bramford) and the South East Anglia connection (Bramford to Tilbury). We also note the references to the Overarching National Policy Statement for Energy – EN1 and EN5, which references landscape and visual factors

We note that the routeing constraints in Tables 3.1 and substation siting constraints only refer to nationally designated sites and residential properties. However, we recommend that locally designated sites and similar e.g. Special Landscape Areas are also included as mapped landscape and visual constraints. It would also be beneficial for valued landscape qualities for landscape character areas to be analysed as these would be particularly useful in ensuring landscapes outside of designations are appropriately reviewed and impacts minimised as far as practicably possible by routeing revisions, design optioneering and mitigation measures.

Para 3.2.10 states that the potential to route parallel in close proximity to existing 400kV overhead lines is a principal opportunity and would restrict the geographic extent of environmental effects associated with such infrastructure. Earlier indications of the proposed power line corridor showed this was the case, however, under the new proposals, a large section of the new overhead lines will be distanced from the existing line, introducing landscape visual impacts in areas where the baseline landscape has not yet been affected by electricity infrastructure. We note that the Holford and Horlock rules have been used as a guide to routeing and siting of new infrastructure, however we would advise further details on the existing constraints are provided to justify the new routeing proposals.

In addition, given the new route alignment, we would recommend alternative designs such as T-Pylons across the Essex region are explored to mitigate the visual impact of transmission infrastructure.

The location of Cable Sealing End (CSE) compounds and proposed substations must not only be carefully considered in terms of impacts on visual amenity and landscape character, but also in regard to the setting of the AONB. The Dedham Vale AONB Position Statement (revised Nov 2016) states that “The setting of the Dedham Vale AONB does not have a geographical border. The location, scale, materials or design of a proposed development or land management activity will determine whether it affects the natural beauty and special qualities of the AONB. A very large development may have an impact even if some considerable distance from the AONB boundary.” and “Adverse impacts might not be visual. The special qualities of the Dedham Vale AONB include tranquillity. A development which is noisy may well impact adversely on tranquillity even if not visible from the AONB.” It is therefore considered that different locations of CSE compounds at

extended distances from the AONB are explored to fully understand impacts on setting and natural beauty.

We also highlight that any undergrounding in visually sensitive areas such as AONBs, may result in increased landscape impacts from trenching and construction of Cable Sealing End (CSE) compounds and we would expect a full audit of the landscape features and habitats on site to be undertaken to inform the alignment and mitigation proposals.

The National Grid's Landscape Enhancement Initiative, which is part of the Visual Impact Provision project, is very much relevant to the AONB area. However, we would advise a similar framework approach is applied to the project as a whole given the evidence available that demonstrates the overall sensitivity of the landscape. Therefore, the extant and rationale for offsite planting and landscape improvement works should align with this initiative.

To help reduce adverse landscape and adverse impacts along the proposed route, we would recommend that strategic opportunities are taken to rationalise and upgrade/remove the existing 132kv lines where possible.

#### Norwich to Bramford – Sections C-E

As noted in Recommendation no.1, other landscapes outside of nationally designated landscapes should be appropriately analysed and the route designed accordingly. The Draft NPS EN-1 (Para 2.11.20) states "The Secretary of State should also have special regard to nationally designated landscapes, where the general presumption in favour of overhead lines should be inverted to favour undergrounding. Away from these protected landscapes, and where there is a high potential for widespread and significant landscape and/or visual impacts, the Secretary of State should also consider whether undergrounding may be appropriate, now on a case-by-case basis, weighing the considerations outlined above."

Therefore, we would advise that a detailed assessment of other valued landscapes such as the Waveney Valley and Gipping Valley are undertaken and in turn National Grid considers additional undergrounding in these areas.

#### Bramford to East Anglia Connection (EAC)

The landscape south of the AONB contributes towards its setting and therefore careful consideration for the route and design need to be taken. We note that the landscape around Lawford and the proposed substation location is an open and exposed plateau with a low density and rural settlement pattern, therefore any changes to the skyline in the form of multiple pylons may have detrimental impacts on both character and visual amenity. Currently the proposed routes to and from the EAC are proposed as overhead pylons, however given the pylons will be seen in combination with each other, the potential impacts could be significant. For this reason, we would recommend National Grid explore options to continue the proposed undergrounding through the AONB, to the EAC.

The landscape response to cumulative impacts at and around the Bramford Sub-station needs to be carefully considered. Currently there is a number of live and upcoming applications in and around the Bramford area of an industrial character, that will have a detrimental impact on the landscape and Bramford as a settlement. Mitigation measures such as the reinforcement of historic field boundaries, restoring and planting hedgerows, as well as increasing the stock of hedgerow trees are important measures to consider on site.

We would expect preliminary consultations on other national grid schemes to be provided at the earliest opportunity to allow us to understand the cumulative impacts and assess whether there are opportunities for cumulative mitigation measures both on and off site.

### Next Steps

The National Planning Statement (NPS) EN-1 Section 5.9 also sets out recommendations and requirements in relation to landscape and visual impact. These are detailed below in *italics*:

*The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England (NPS EN-1 Para 5.9.5).*

In Suffolk, the primary source of information for the landscape baseline is the Suffolk Landscape Character Assessment, which has informed the district level BMSDC Landscape Guidance (2015) and the Managing a Masterpiece LCA.

On this basis it is recommended that the Suffolk LCA provides the overarching framework for the baseline study, with further reference to the BMSDC Guidance and Managing a Masterpiece Study for localised details on local character and cultural heritage within the AONB and the Stour Valley project area.

In Essex, the primary sources of information for the landscape baseline include [but are not limited to]:

- Essex Landscape Character Assessment (Chris Blandford Associates, 2003);
- Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessments (Chris Blandford Associates, 2006);
- Tendring Landscape Character Assessment Volume 1 and 2 (LUC, 2001); and
- Land of the Fanns Landscape Character Assessment (Alison Farmer Associates, 2016)

On this basis it is recommended that the Essex LCA provides the overarching framework for the baseline study, with further reference to the District level assessments. That said, given most of the baseline documents are now over 15 years old, we would recommend

National Grid consider undertaking a review/update of the LCA / Detailed Landscape Characterisation Study to help inform the routeing and design options for the new network, as well as landscape mitigation and enhancement measures.

“The applicant’s assessment should include the effects during construction of the project and the effects of the completed development and its operation on landscape components and landscape character” (Para 5.9.6).

GLVIA3 recognises that landscape value is not always signified by designation: ‘the fact that an area of landscape is not designated either nationally or locally does not mean that it does not have any value’ (paragraph 5.26).

In determining landscape value, TGN 02-21 ‘Assessing the Value of Landscapes Outside National Designations’ has recently been published and builds on the details within GLVIA3 and the assessment of value (GLVIA3 Box 5.1).

For instance, Table 1 of the TGN provides a range of factors that can be considered when identifying landscape value. This includes the incorporation of cultural associations (natural heritage and cultural heritage) into consideration of landscape value, which is greatly supported.

*“National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty (Para 5.9)*

*... consideration of such applications should include an assessment of:*

- *the need for the development, including in terms of national considerations, and the impact of consenting or not consenting it upon the local economy;*
- *the cost of, and scope for, developing elsewhere outside the designated area or meeting the need for it in some other way; and*
- *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.” (Para 5.10)*

It would be expected that the following reference/guidance documents are considered and used as part of any future assessment. This includes:

- Dedham Vale AONB and Stour Valley Management Plan
- Dedham Vale AONB Natural Beauty and Special Qualities and Perceived and Anticipated Risks (July 2016)
- Managing a Masterpiece Evaluation Report (Dec 2013)
- Valued Landscape Assessment Stour Valley Project Area (March 2020)

## **Ecology**

### Current route and design

We have reviewed the Corridor and Preliminary Routeing and Siting Study Report and appendices as well as the Public Consultation Strategy (all National Grid, April 2022). This provides comments on the South East Anglia connection (Bramford to Tilbury) including a new East Anglia Connection substation.

We note that the routeing constraints in Tables 3.1 only refer to statutory designated sites and we strongly recommend that non-statutory designated sites e.g. LoWS are also included as mapped ecological constraints although many are ancient woodland, an irreplaceable habitat. We welcome that the substation siting constraints in Table 3.2 include Priority habitats but again recommend that non-statutory designated sites e.g. LoWS are also included to avoid significant ecological impacts as this could trigger the need to deliver compensatory habitat.

We highlight that any undergrounding in visually sensitive areas such as AONBs, may result in increased ecological impacts from trenching and construction of Cable Sealing End (CSE) compounds and we are willing to be involved in fine tuning the locations and methodologies, with site visits as considered appropriate.

We appreciate that the details for ecological survey & assessment for protected and Priority species likely to be present in the Preferred Corridor and would be affected, will come at a later stage.

We note that if any ecology constraints are scoped out of the Options Appraisal, they would still be covered in the Environmental Statement for assessment.

#### Bramford to East Anglia Connection (EAC)

We understand that the route in this section, as well as the substation site, will need to fit in with other projects e.g. Bramford to Twinsted NSIP, and we would welcome the opportunity to input local knowledge to this element of the project.

We note that para 5.5.3 recognised that from a Biodiversity and Ecology perspective, Options BE1 and BE2 were considered to perform more poorly than other options due to the potential for a Likely Significant Effect (LSE) on the Stour and Orwell Estuaries SPA and supporting Cattawade Marshes SSSI (which forms part of the SPA). We welcome this as NPS- EN5 states that particular attention will be needed to minimise the likelihood of large birds such as swans and geese colliding with overhead lines associated with power infrastructure particularly in poor visibility.

We recommend that crossing the Suffolk/Essex county boundary needs careful consideration as Swans are a qualifying feature of the Stour & Orwell Estuaries SPA which includes Cattawade Marshes SSSI. We highlight that this would trigger a requirement for a shadow HRA screening report to assess impacts from EA GREEN, either alone or in combination with other plans and projects.

We note that, overall, western options (Options BE3 and BE4) are preferred from a Biodiversity and Ecology perspective as they would not be likely to result in LSEs on these designations. However, with the exception of Option BE3, which contains (though does



not route through) the Hintlesham Great Wood SSSI, all options avoid smaller areas of high amenity value or scientific interest (Holford Rule 2). Whilst Options BE3, BE4 and BE5 do contain more areas of woodland than the other options, the corridors are considered to be of sufficient width to allow the identification of alignments which would avoid such woodland. We agree that further work is required as part of the detailed routing process to refine an alignment to comply with this rule as far as possible. Whilst more westerly options are preferred from a Biodiversity and Ecology perspective, Option BE5 is assessed to have the least potential of those that pass through the Dedham Vale AONB to have potential for effects resulting in LSEs on the designations of the Orwell Estuaries SPA and Cattawade Marshes SSSI (part of the above SPA).

Based on the information provided, we support the graduated swathe for Bramford to EAC based on **Option BE5 is the preferred option.**

### EAC

We note that from an Ecology and Biodiversity perspective in relation to the siting of the substation, all the siting option zones were considered comparable when applying standard best practice mitigation measures. With regard to the 400kV overhead lines, all corridors were assessed as neutral, and could support a route alignment, subject to appropriate and localised mitigation hierarchy mitigation and habitat reinstatement.

Based on the information provided, we support **Zone A as the preferred option for the EAC.**

We understand that the substation site will need to fit in with other projects e.g. Five Estuaries and North Falls NSIPs, and we would welcome the opportunity to input local knowledge to fine tuning this element of the project to confirm a location with the chosen siting zone around the existing substation.

### EAC to Tilbury

We note that Abberton Reservoir SPA falls wholly within the Study Area (it is surrounded) and is included for the same reason. Species dependant on these designated areas may forage, roost or migrate (on a daily and/or seasonal basis) on non-designated habitats surrounding the designations or further inland.

We also note that from a Biodiversity and Ecology perspective, corridor options composed of sections furthest from the coast (Sections F, G, H, J, K and R) are preferred from the EAC substation to Tilbury. These corridor options are not likely to result in adverse effects on the integrity of internationally designated sites, or at the very least present significantly less risk in respect of Likely Significant Effects (LSEs) on the integrity of the international and supporting nationally designated sites. The relevant sites are listed below:

- Section N (Colne Estuary SPA, Colne Estuary Ramsar, Colne Estuary SSSI, Blackwater Estuary SPA, Blackwater Estuary Ramsar, Blackwater Estuary SSSI, Essex Estuaries Special Area

of Conservation, Abberton Reservoir SPA, Abberton Reservoir Ramsar and Abberton Reservoir SSSI);

- Section P (Blackwater Estuary SPA, Blackwater Estuary Ramsar, Blackwater Estuary SSSI, Essex Estuaries SAC Essex Estuaries (and component SSSIs); and
- Section S (Crouch and Roach Estuaries SPA, Crouch and Roach Estuaries Ramsar, Crouch and Roach Estuaries SSSI, Benfleet and Southend marshes SPA, Benfleet and Southend Marshes Ramsar (and component SSSIs), Thames Estuary and Marshes SPA, Thames Estuary and Marshes Ramsar (and component SSSIs), Outer Thames Estuary SPA, Outer Thames Ramsar , SAC Essex Estuaries SAC and Blackwater Estuary SPA, Blackwater Estuary Ramsar , Blackwater Estuary SSSI and Pitsea Marsh, Langdon, Vange & Fobbing Marshes, Holehaven Creek Mucking Flats and Marshes SSSIs).

These designated sites (which include highly mobile qualifying interest features) and functionally linked habitats, are sufficiently close to the corridor options east of Colchester and which are close to the coast, to mean that direct or indirect effects would result in LSEs on the integrity of the designated sites. In addition, these corridor options cross potential connectivity pathways to the designated sites (e.g. River Blackwater) which would be likely to result in LSEs and with potential for Adverse Effects on Integrity (AEol) of the designated sites, during both construction and operation of the transmission connection. This potential long term operational effect arises from the potential collision of those species with overhead lines (the earthwire is typically of most concern in 400kV overhead line connections due to its lower visibility) as highlighted above in relation to NPS EN5. The employment of alternative technology such as undergrounding in the ZOI is a potential mitigation, but in itself, may result in LSE or AEol so would trigger a requirement for a shadow HRA screening report to assess impacts from EA Green, either alone or in combination with other plans and projects.

We acknowledge that the Blackwater Estuary and Abberton Reservoir are likely to have a considerable level of exchange of birds between them (a functional relationship that is not fully understood at this stage of appraisal), including species that are known to be vulnerable to risk of overhead line collision. This has the potential to apply to some or all of the other designations along the coastal corridor options. Thus, it confers further significant complexity in terms of both approach to survey and assessment, and thus the evidential burden on the project in terms of the quality and amount of the survey data required to rule out AEol beyond all reasonable scientific doubt, in consultation with Natural England.

It is acknowledged that section R would fall within close proximity to the Thames Estuary and Marshes SPA (and Ramsar site) with the potential for LSEs. However, due to the orientation of section R, which approaches the coast from inland rather than running parallel to the coast, it is not in such close proximity to the designations. It is therefore likely to have less adverse effects than of section S, the only alternative to link to Tilbury

Substation. Therefore, whilst there is potential for some LSEs to occur, the weight of probability is that any AEol are potentially more capable of being adequately negated through mitigation measures. Should AEol remain, it would be necessary to demonstrate no better alternative (section S does not provide this) and Imperative Reasons of Overriding Public Interest (IROPI), and clear and demonstrably sufficient levels of compensatory measures to demonstrate the maintenance of overall coherence of the designated site affected, would be required. Section R thus provides the preferable alternative to section S, which is adjacent to the designated sites and the expert assessment is that the latter is more likely to result in AEol.

We therefore welcome that Option ET1, routeing to the north of Colchester and to the west of Chelmsford (composed of either Section F and G, or Sections H and J, plus Sections K and R) was therefore considered the preferred option from a Biodiversity and Ecology perspective.

Based on the information provided, we support the graduated swathe for EAC to Tilbury based on **Option ET1 is the preferred option.**

### **Other matters**

We are concerned that more information is needed to understand the impacts on hedgerows along the route, particular those that could be important for bat foraging and commuting routes for Barbastelle bats or Dormouse.

### **Next Steps**

We seek to inform choices on micro routeing to avoid ecological features including veteran trees (irreplaceable habitat) and species options for restoration planting schemes as well as securing temporary mitigation measures during construction

### **Highways and Transportation**

This non statutory consultation represents an early strategic consultation and from a highways viewpoint and any comments that are made at this time can only be based on the limited information it contains in terms of the impact on Highways and Transportation. A such it is similar to other NSIP proposals at, for example, Bramford-Twinstead, North Falls and Five Estuaries in that we can only really enter into meaningful dialogue once there is clarity on the route of the East Anglia Green scheme, working areas and method of construction that will start to determine requirements for access points, HGV traffic/volumes, temporary road /PROW closures or mitigation works and workforce which will temporarily impact on the operation of the highway network.

However, and at this time, the proposal as presented by EAG are lacking in any detail whatsoever to make a qualified, considered and informed professional comment on the impact of the development from a highways and transportation perspective. It is disappointing that the consolation lacks any detail and it is assumed that this important topic has not been used to qualify or evaluate the effectiveness or otherwise of any rote choice whatsoever.

Going forwards proposals will be required to demonstrate that the local and strategic highway network will be able to accommodate the type and number of vehicle movements proposed during the construction, and operational phases of the site. In addition, proposals will need to demonstrate that both the site access(s) and vehicle movements to and from the site will have no adverse impacts on highway safety, including consideration to any impact on vulnerable road users and Public Rights of Way.

Offsite mitigation may be required to ensure that the network is suitable for the expected level of construction traffic. As such the NSIP should be accompanied by a detailed Transport Assessment and Construction Traffic Management Plan, the scope of which should be agreed with the Highway Authority. In this regard applicants are strongly encouraged to engage with Essex Highways prior to the submission of the NSIP to the Planning Inspectorate.

Where opportunities exist for access to significant development sites to be made by active and sustainable travel modes during the construction period these shall be exploited and/or further enhanced by improvements to the highway network for walking, cycling and public transport. A Travel Plan will also be required for all development sites to (where possible) promote the use of active and sustainable modes of travel and also to support initiatives such as car sharing and/or mini bus shuttle services that may be applicable to more isolated rural locations.

It is essential that all NSIPs are accompanied by up to date information regarding the extent of the highway boundary and any affected Public Rights of Way insofar as affected by the development site, site access(s) and any proposed offsite highway mitigation.

When looking at the EAG scheme website it is noted that the project is in very close proximity to the A12 and is proposed to start on site in 2027. If the projects commence on time there will be a construction overlap. With this in mind it is not correct to state at 4.4.4 that "there will be no construction overlap" as this is clearly not the case. It is necessary therefore to show how this overlap will affect each proposal in combination.

In addition it is likely that in the near future the as anticipated dualling of the A120 from Braintree to Marks Tey will come forward. It is not known how EAG will interface with the same.

### **Lead Local Flood Authority**

ECC as the LLFA notes the current documentation provided shows very limited if any meaningful consideration in relation to flood risk. While the development may have a minimal physical footprint, it should not lead to the exclusion of flood risk from the constraints to be considered, including haul routes, compounds, river crossings, horizontal drilling, soil storage etc.

Overarching National Policy Statement for Energy (EN-1) clearly indicates that Flood risk is a 'generic impact' that requires consideration on all energy projects. While Section 5.7 of EN1 states that "*Although flooding cannot be wholly prevented, its adverse impacts can*

*be avoided or reduced through good planning and management."* However, no high-level consideration is currently demonstrated in relation to this project at this time.

Some further consideration of all sources of flood risk would need to be provided in the route selection process for both the temporary and permanent works proposed to be included within the scheme.

### **Socio Economics**

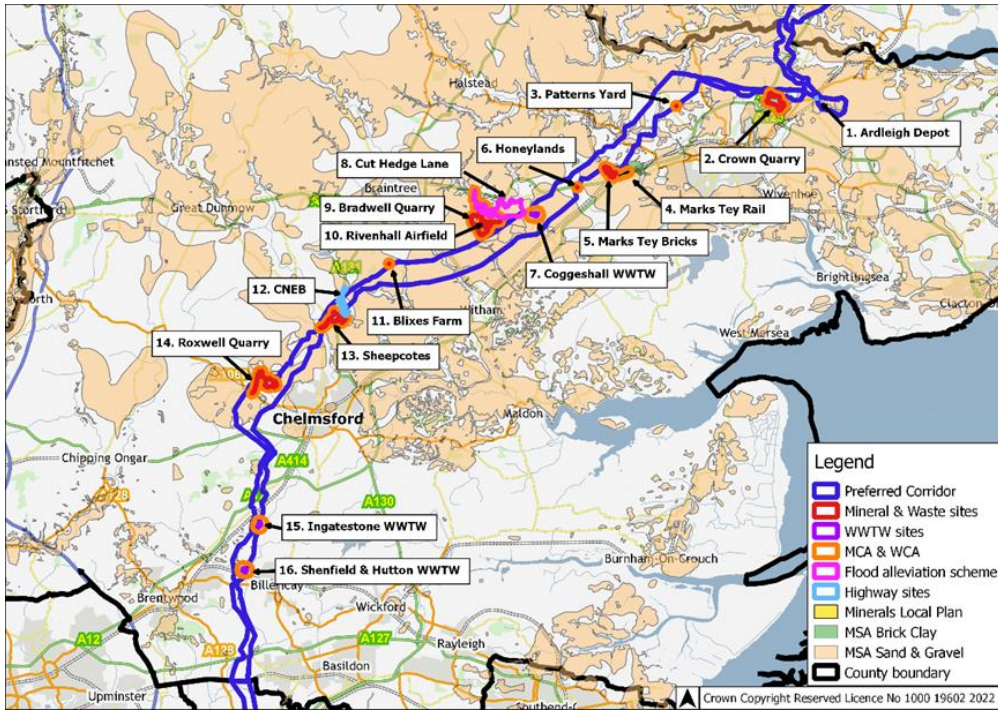
The potential socio economic impact of this DCO proposal is both hugely significant and understated in the current round of consultation to the detriment of the submission.

ECC are keen to work with the developers to establish an Essex Adult Skills Programme, based on other schemes that they've set up elsewhere in the country. We'd wish to target specific groups and help local people find new jobs through this Adult Skills programme. We would also encourage the developer's early intervention with Essex schools to prep the future workforce and assist in the general CEIAG agenda.

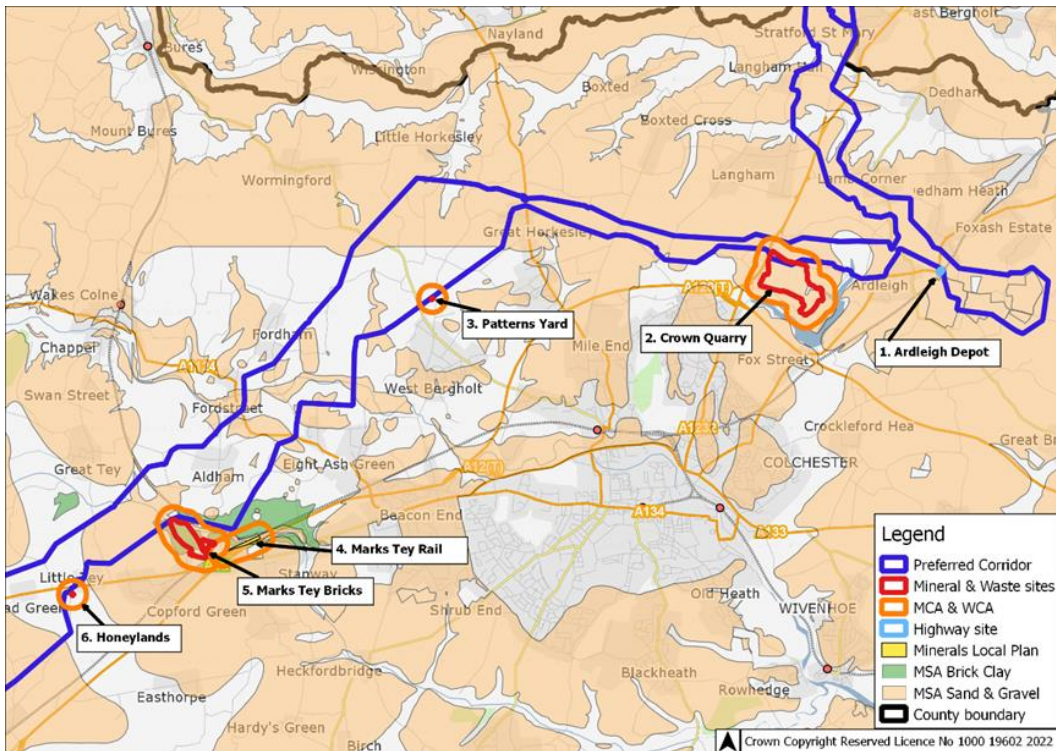
By working directly with us and our partners, East Anglia Green can join an established network of skills providers and Anchor institutions with a clear focus on developing the skills base of Essex residents whilst meeting the needs of NSIPs and other projects. We are keen to identify local skills gaps in the construction industry and develop targeted training programmes to help plug any gaps.

## **Appendix Two**

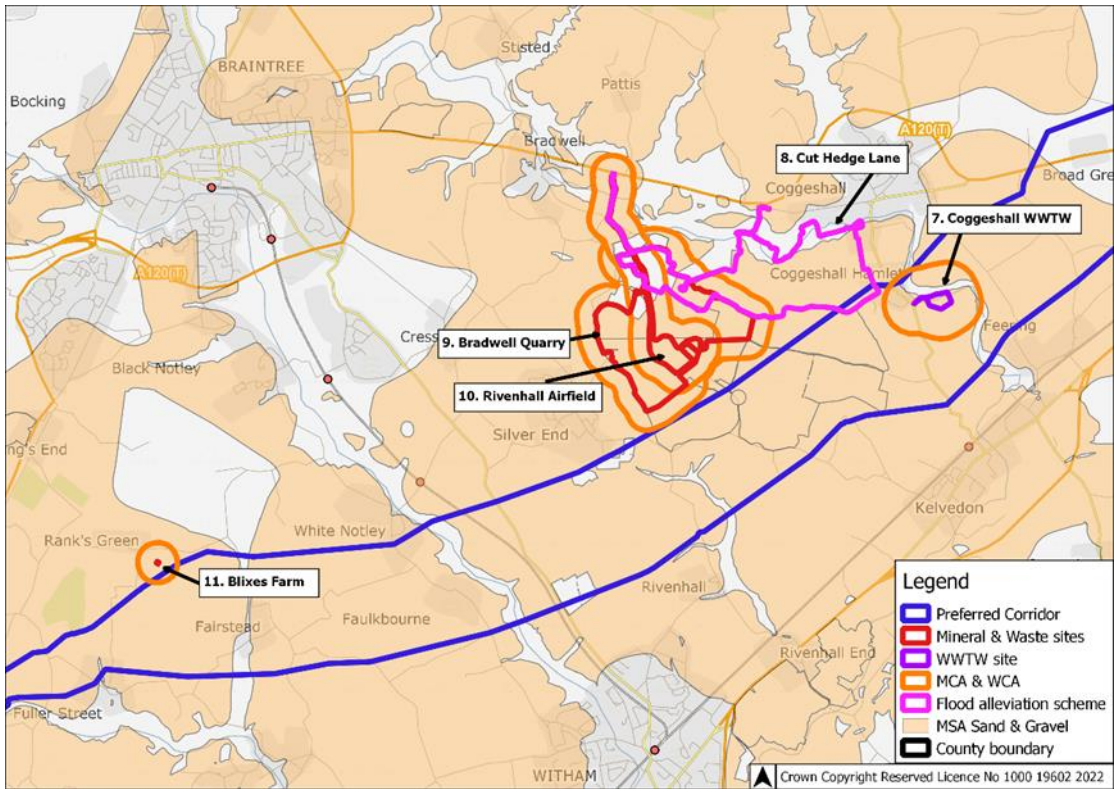
Map 1 – Minerals and Waste Safeguarding Screening – Full Extent of Proposed Development



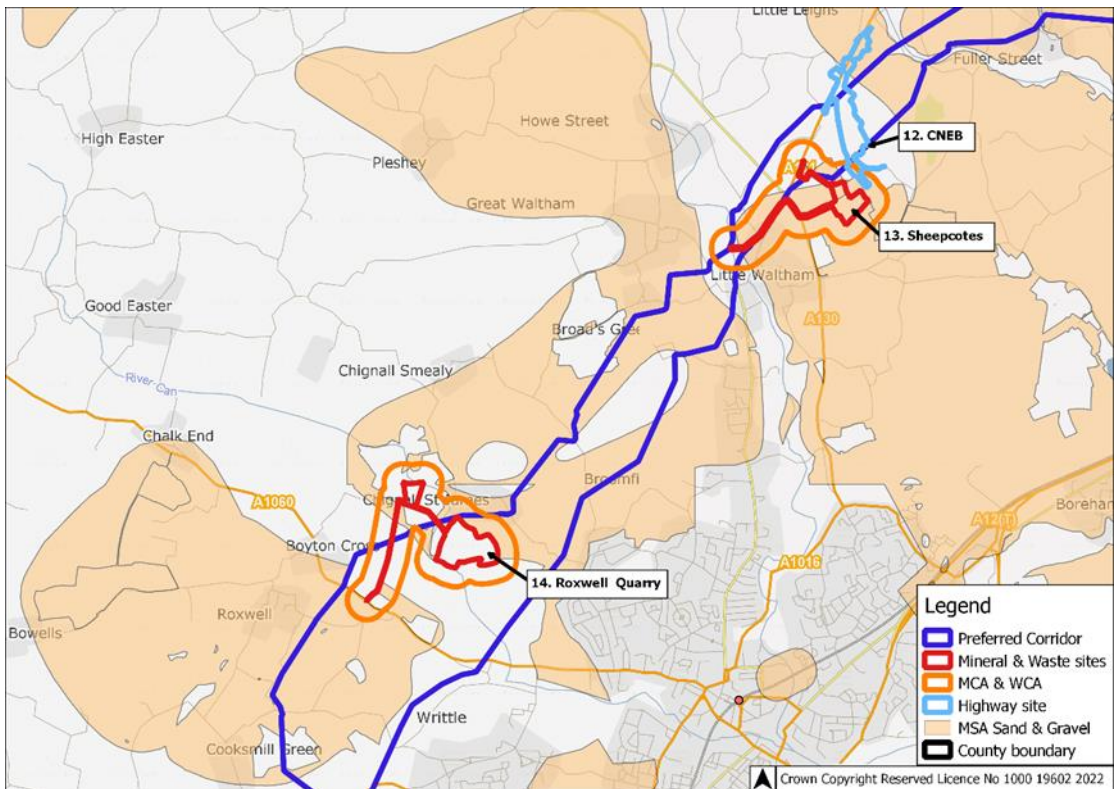
Map 2 – North East Essex



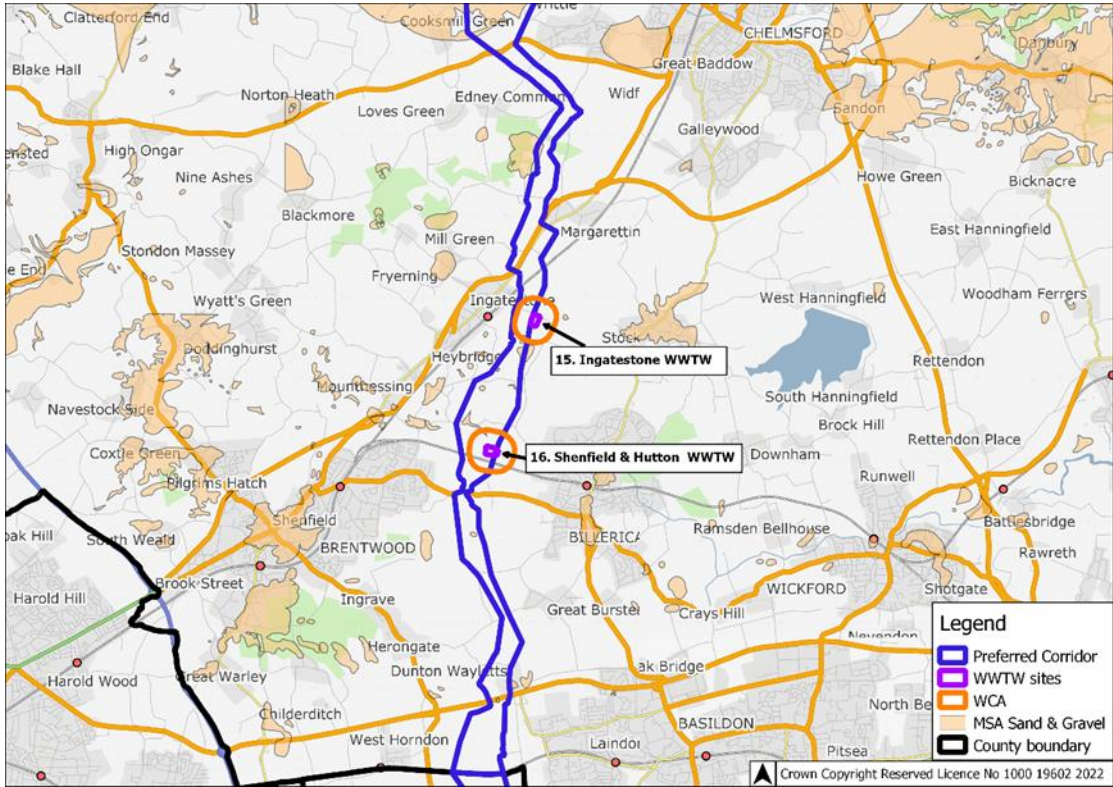
Map 3 – North Essex



Map 4 – Central Essex



Map 5 – South Essex





### Appendix Three

#### Schedule of Safeguarding Designations and Safeguarded Minerals and Waste Infrastructure Relevant to The Application Site

#### Schedule of mineral infrastructure and designations within the application site

Details of planning applications can be viewed on the [ECC website](#), by accepting the disclaimer and then searching on the planning reference

Site type	Site name	Planning application number	Further Details
Mineral Safeguarding Areas  Policy implications set out under 'Mineral Matters – Safeguarding Mineral Resources'. Subject to MSA designation – Policy 8 of the Essex Minerals Local Plan 2014  Spatial extent shown in Appendix Two.	Sand and gravel	N/A	
MLP Allocations or Safeguarded Mineral Development Sites  Policy implications set out under 'Mineral Matters – Safeguarding Mineral	2. Wick Farm, Ardleigh RESERVOIR, Crown Quarry (Ardleigh Reservoir Extension), Old Ipswich Road, Tendring, Colchester, CO7 7QR	ESS/57/04/TEN - Winning & Working of minerals, removal of surplus soils & erection of a low profile processing plant concrete batching plant & ancillary buildings (inc a workshop). Interim restoration to lakes & subsequent construct of a public water storage.	17/07/2028 permission end date

<p>Infrastructure'. Subject to MCA designations – Policy 8 of Essex Minerals Local Plan 2014.</p> <p>Spatial extent shown in Appendix Two.</p>			
	4. Marks Tey Rail Siding	MLP2014 Site F3 (p181)	
	5. Marks Tey Bricks, Church Lane, Marks Tey, Colchester, Essex, CO6 1LN.	ESS/26/08/COL - Periodic review of mineral permission IDO/COL/1/92A for the extraction of brickearth clay and use in the adjacent brickworks	
	8. Land North of Cuthedge Lane, Grange Farm, Coggeshall, CO6 1RE	ESS/01/19/BTE/SPO - EIA Scoping Opinion Request re: Creation of a passive flood alleviation scheme through the construction of a low level “on-line” embankment (or dam) across the River Blackwater and the creation of an “off-line” flood storage area and connection points within the flood plain of the Blackwater Valley which will be delivered through the phased extraction of approximately 13 million tonnes sand and gravel and the restoration of land for agricultural purposes with a wetland flood meadow using the underlying clay	Opinion Issued – 25/02/2019
	9. Bradwell Quarry	MLP2014 – Sites A3, A4, A5, A6, A7 (p145 – 151)	
	<p><b>Site A5</b> <b>Extant Permission</b></p> <p>ESS/03/18/BTE - Site A5 came forward as a planning application in 2018 and was granted planning permission. Extraction and progressive restoration is ongoing within site A5, with anticipated completion in 2022.</p>		

		<p><b>Current Application(s)</b></p> <p>ESS/35/20/BTE - to allow extended week day hours for the dry silo mortar plant for the life of the development following the 12-month trial period. (Decision pending a legal agreement)</p> <p>ESS/79/20/BTE - to allow amended timescales for phasing of working and restoration, such that restoration is required to be completed by July 2021, one year later than previously permitted. (Decision pending a legal agreement)</p> <p><b>Site A6</b></p> <p>No applications have been submitted on this site.</p> <p><b>Site A7</b></p> <p>ESS/12/20/BTE - Extraction of 6.5 million tonnes of sand and gravel (Decision pending a legal agreement)</p>	
	<p>13. Land at Sheepcotes Farm, Sheepcotes Lane, Little Waltham, CM3 3LU</p>	<p>ESS/01/18/CHL - The construction of an agricultural reservoir involving the extraction, processing and exportation of sand and gravel and soils; the erection and use of an on-site processing plant with ancillary</p>	<p>Commencement required by 31/07/2022. Once commenced, mineral extraction to be completed within 5 years; with</p>

		facilities; and highway and access improvements. Together with the construction of an associated irrigation pipeline from the proposed abstraction point (River Chelmer at Langleys, Great Waltham)	restoration due within a further 12 month period
	14. Roxwell Quarry	Previously subject to ESS/70/17/CHL	The landfill or quarry are not active anymore. The eastern side of the site is restored and landfill gas is being extracted. The western side of the site is currently being restored and is due to have seeds planted in the next few months.

#### Schedule of waste infrastructure and designations within the application site

Site type	Site name	Planning application number	Further Details
Waste management infrastructure (subject to WCA designations – Policy 2 of Essex and Southend-on-Sea Waste Local Plan)	1. Ardleigh Highway Depot	CC/TEN/83/05 - The construction of a 14m high 'dome' building for the storage of Road Salt, with the formation of hard surfacing and the erection of 2.5m high steel palisade fencing to site perimeter	
	3. Patterns Yard, Nayland Road, West Bergholt, Colchester, CO6 3DG	ESS/41/11/COL - Retrospective importation of inert waste material (hardcore, concrete and soils), together	

		with storage and recycling of the same prior to export from the site.	
	6. Honeylands Farm, Little Tey, Marks Tey, Colchester, CO6 1HU	ESS/41/08/COL - Change of use of an industrial unit to a waste transfer station to be used for the recycling of waste arising from highway gullies, including the construction of concrete pads, sumps, ancillary equipment, office and welfare facilities	
	7. Coggeshall WWTW, Blackmore End, Braintree CM7 4DF	Braintree District Council permission 76/00763/P – Construction of new sewage treatment works and access road.	
	10. Land at Rivenhall Airfield, Coggeshall Road (A120), Braintree CO5 9DF	ESS/34/15/BTE – (inter-alia) ‘The Integrated Waste Management Facility comprising: Anaerobic Digestion Plant treating mixed organic waste, producing biogas converted to electricity through biogas generators; Materials Recovery Facility for mixed dry recyclable waste to recover materials e.g. paper, plastic, metals; Mechanical Biological Treatment facility for the treatment of residual municipal and residual commercial and industrial wastes to produce a solid recovered fuel; De-inking and Pulping Paper	Likely to recommence implementation in 2021.

		<p>Recycling Facility to reclaim paper; Combined Heat and Power Plant (CHP) utilising solid recovered fuel to produce electricity, heat and steam; extraction of minerals to enable buildings to be partially sunken below ground level within the resulting void; visitor/education centre; extension to existing access road; provision of offices and vehicle parking; and associated engineering works and storage tanks. And approval of details...'</p> <p>WLP2017 - IWMF Rivenhall - IWMF2</p>	
	<p>11. Slaughter House at Blixes Farm, Ranks Green Road, Fairstead, Essex, CM3 2BH</p>	<p>Earliest ECC electronic record</p> <p>ESS/33/15/BTE - Installation of a sealed rectangular plastic coated polyester fabric bladder tank complete with vent pipes and drum type activated filters, measuring 29.20m long x 25.66m wide x 2.80m deep of which 1.1m would be above ground level to facilitate the storage of abattoir wash water</p>	
	<p>15. Ingatestone WWTW</p>	<p>Earliest ECC electronic record</p>	

		ESS/22/05/BRW - Construction of kiosk to house electrical equipment to control plant on site. Can't find Brentwood permission.	
	16. Shenfield & Hutton WWTW	ESS/46/17/BRW - Lawful Development Certificate	

### Other County Matters

Site type	Site name	Planning application number
Road Scheme	12. Chelmsford North-east Bypass (CNEB)	CC/CHL/85/21 – Chelmsford North East Bypass (CNEB): A single carriageway road between Roundabout 4 of the Beaulieu Park Radial Distributor Road (RDR1) and a new roundabout on the A131 at Chatham Green plus dualling of the existing A131 between Chatham Green and Deres Bridge roundabout. With one intermediate roundabout, 3 road overbridges and 1 pedestrian/cycle/horse overbridge. Together with other associated works and landscaping.

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# Agenda Item 7

<b>Committee:</b> Policy, Resources and Economic Development Committee	<b>Date:</b> 13 July 2022
<b>Subject:</b> Ingatestone and Fryerning Neighbourhood Plan (2020-2033) Update	<b>Wards Affected:</b> Ingatestone and Fryerning
<b>Report of:</b> Phil Drane, Corporate Director (Planning and Economy)	<b>Public</b>
<b>Report Author:</b> Name: Andrea Pearson, Senior Policy Planner Telephone: 01277 312572 E-mail: andrea.pearson@brentwood.gov.uk	<b>For Information</b>

## Summary

This report provides an update on the Ingatestone and Fryerning Neighbourhood Plan. Brentwood Borough Council has taken responsibility for the neighbourhood plan through the examination process and beyond, as required by regulations.

The council approved the designation of Ingatestone and Fryerning Parish as a Neighbourhood Plan Area in October 2017. The parish council neighbourhood planning group subsequently prepared a draft neighbourhood plan and consulted on the document before formally submitting the draft plan to Brentwood Borough Council in November 2021. The neighbourhood plan was brought to Policy, Resources and Economic Development Committee on 24 November 2021, where the committee formally accepted the draft plan, agreed to undertake required consultation, approved delegated powers to make any modifications as determined through the examination process, and proceed to referendum.

The neighbourhood plan has since been consulted on. An independent examination of the plan was undertaken by a Planning Inspector who has concluded that the plan can proceed to referendum provided the required modifications are made (Appendix A). The required modifications have been made to the plan and the referendum process commenced on 30 June 2022 (Appendix C). The referendum will run for 28 working days and the vote held on Thursday 4 August 2022. Residents within the parish area who are eligible to vote will be able to vote on whether the plan should be approved (or 'made'). A majority vote is required for the plan to be made. If the plan is made it will then form part of the council's planning development framework and need to be considered for any planning application in the area.

## Main Report

### **Introduction and Background**

1. The 2011 Localism Act introduced new powers for local communities to produce neighbourhood plans, which can be used to guide and shape future development in an area. Once adopted a neighbourhood plan forms part of a statutory Development Plan for the area and it is used in the determination of planning applications alongside the Brentwood Local Plan and other material planning considerations, including the National Planning Policy Framework.
2. Brentwood Borough Council approved the designation of the Ingatestone & Fryerning parish as a Neighbourhood Plan Area on 11 October 2017 (Planning & Licensing Committee, Item 136). The neighbourhood plan was subsequently drafted by the parish council and published for public consultation as required under Regulation 14 for six weeks between September and October 2020. Brentwood Borough Council responded to the Regulation 14 consultation, expressing general support for the plan but highlighting the need for a screening opinion report in relation to the potential need for a Strategic Environmental Assessment (SEA) and Habitat Regulation Assessment (HRA). The SEA / HRA screening opinion is the responsibility of the local planning authority. This work was completed in July 2021 and the neighbourhood planning group undertook a focussed consultation with the required environmental bodies at this time, as required by the Neighbourhood Planning Regulations.
3. National planning practice guidance states that a neighbourhood plan must meet basic conditions as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. The submission of the Ingatestone & Fryerning Neighbourhood Plan under Regulation 15 included a statement that set out how the plan met the basic conditions, as set out below:
  - a) The neighbourhood plan has regard to national policies and advice contained in guidance issued by the Secretary of State;
  - b) How the neighbourhood plan contributes to the achievement of sustainable development;
  - c) The neighbourhood plan conforms with the strategic policies of the Brentwood Local Plan;
  - d) The neighbourhood plan must be in conformity with the EU obligations; and

- e) Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with proposals within the neighbourhood plan.
4. The final draft version of the neighbourhood plan was brought to Policy, Resources and Economic Development Committee on 24 November 2021 (Item 185). The committee formally accepted the draft plan, agreed to undertake the required consultation (Regulation 16), approved delegated powers to make any modifications as determined through the examination process, and proceed to referendum.

#### **Update since November 2021**

5. The council undertook the Regulation 16 consultation between December 2021 and March 2022. The plan was then submitted for examination on 7 April 2022 following the appointment of an independent planning inspector, Mr. Derek Stebbing BA (Hons) DipEP MRTPI (Regulation 17) via Intelligent Plans Examinations (IPE).
6. The inspector sent five questions to the council and Qualifying Body (the neighbourhood planning group), most of which were points of clarification that the council responded to on 4 May 2022 (Appendix B).
7. The inspector's final report was received and published on 16 June 2022. It concluded that the plan could proceed to referendum provided the required modifications were made.
8. The neighbourhood plan has now reached Regulation 19 stage: Referendum. The referendum period will run between 30 June to 4 August 2022, in line with requirements. Voting on whether the neighbourhood plan should be adopted (referred to in the neighbourhood planning regulations as being 'made'), will take place on 4 August 2022. Local residents who live within the parish boundary and are registered to vote will be sent a polling card asking the following "yes" or "no" question:
- "Do you want Brentwood Borough Council to use the Neighbourhood Plan for Ingatestone & Fryerning to help it decide planning applications in the neighbourhood area?"*
9. The neighbourhood plan will be adopted at Regulation 20 provided at least 50% of residents vote to do so through the referendum process.

## **Issue, Options and Analysis of Options**

10. Neighbourhood plans give local communities direct power to develop a shared vision and shape the development and growth of their area. The neighbourhood plan has undergone the necessary examination process and has been permitted to proceed to referendum, provided the required modifications were made. The required modifications are summarised below. These modifications have been made prior to the commencement of the referendum, as required.

### **Policy 1: Housing**

11. Policy 1 consists of three core parts:
  - a) Addresses the allocation of site R22 in the adopted Brentwood local plan, and the specific planning requirements for the development of the site;
  - b) Sets out the requirement for planning contributions to be sought for the provision of the necessary infrastructure improvements, in terms of education facilities, open space and community facilities, arising from the development of site R22 and its impacts on the surrounding area; and
  - c) States that other proposals for new residential development in the plan area will be supported where they meet and achieve twelve planning criteria set out as part of the Policy, that reflect the Plan's vision and objectives for securing high-quality residential developments.
12. The inspector felt that this policy was justified and generally well written. However, some minor amendments were needed to address representations received from Essex County Council, generally for improved clarity for future users of the plan.

### **Policy 2: Housing Design (newly titled: Design of New Development)**

13. Policy 2 consists of three core parts:
  - a) Sets out 17 planning criteria which development proposals in the plan area should seek to achieve in the design of new housing, covering matters such as sustainable drainage systems, energy efficiency, off-street car parking, on-site waste storage facilities, the preservation of local landmarks, open space and green infrastructure and tree planting;
  - b) New proposals for older people's housing should demonstrate how the principles of the 'Housing our Ageing Population: Panel for Innovation'

(HAPPI) reports have been incorporated into the design of the development; and

- c) Non-residential development should achieve a minimum of Building Research Establishment Assessment Method (BREEAM) 'very good' rating in terms of a buildings environmental performance.

14. The inspector was satisfied that the policy was justified and seeks to achieve high standards of housing design. Modifications were proposed for the purpose of improving clarity for future users of the plan. Specifically, the policy did not include design criteria for non-residential development and included a modification to change the title of the policy to make it clear that it relates to the design of all new development in the plan area, rather than just residential development.

### **Policy 3: Heritage**

15. Policy 3 has two core parts:

- a) States that development within Conservation Areas should demonstrate how the proposals will protect and where possible enhance the character, appearance, setting and historic interest of the Conservation Area; and
- b) States that development proposals should seek to protect and where appropriate enhance heritage assets within the parish. Proposals which affect a designated or non-designated heritage asset should also outline the historical significance of the asset to the character and appearance of Ingatestone and Fryerning and should clearly outline the impacts of the proposed development on the significance and local importance of such assets.

16. Through the course of the examination, the inspector requested maps for the three Conservation Areas identified within Policy 3. The recommended amendments for this policy include the requirement to provide a copy of these Conservation Area maps in an appendix of the plan and make appropriate reference to the appendix in the supporting text for this chapter.

### **Policy 4: Economy**

17. Policy 4 consists of four key parts:

- a) Identifies and supports the employment land allocation (reference: Site E08) contained in the adopted Brentwood local plan for the development

of land totalling 2.08 hectares adjacent to the A12 road and its slip road at Ingatestone for employment uses;

- b) States that the parish council will be supportive of proposals that increase employment opportunities in the local area and support the local economy. It sets out eight criteria for the assessment of employment generating development proposals, in order to ensure that such proposals enhance the local economy in an appropriate and sustainable manner;
  - c) States that parts of Ingatestone High Street are designated as primary retail frontage areas in the adopted Brentwood local plan and that development proposals which support retail and ancillary uses on ground floors in this area will be supported; and
  - d) States that the design of shopfronts in the primary retail frontage areas should seek to maintain and enhance the character of Ingatestone High Street
18. The inspector noted that since the draft version of the neighbourhood plan had been consulted on, the national Use Classes Order had been updated in 2021 and therefore modifications were required to ensure the use classes listed aligned with those listed in the adopted Brentwood local plan and the updated Use Classes Order.

#### **Policy 5: Transport**

19. Policy 5 consists of two core parts:
- a) Proposals that provide or contribute towards new or improved car parking provision in Ingatestone will be supported. In addition, proposals for new or improved bridleways, pedestrian and cycle routes linking Ingatestone and Fryerning, and within the settlements of Ingatestone, Fryerning and Mill Green, will be supported; and
  - b) The Policy sets out a series of 12 criteria for the assessment of transport-related considerations in proposals for new development in the plan area, and that major development proposals should assess the impact of the scheme on local highway capacity and public transport services.
20. The inspector noted that within the justified text reference was made to 'Safe Routes' in relation to pedestrian and cycle paths. However, there was no mention of safe routes within the policy itself. This was raised through the examination process and the borough and parish councils jointly prepared a response to the inspector. This was considered alongside the representations

received from Essex County Council as local highways authority. The inspector recommended some minor amendments to assist with the clarity of the policy and remove reference to safe routes, instead replacing this with more descriptive language to read “Ingatestone pedestrian and cyclist safety improvements”.

### **Policy 6: Environment**

21. Policy 6 consisted of four key objectives:
  - a) To maintain and protect the natural environment and green space within the parish;
  - b) To enhance the biodiversity of the parish;
  - c) To reduce carbon emissions within the parish in order to combat climate change; and
  - d) To ensure all residents living within the parish breathe clean air.
22. The inspector was satisfied that this policy was justified and reflected the objectives of the plan. However, he stated that the length of the policy could make it difficult for some users. Therefore, modifications were suggested to restructure the policy to make it more effective and easier to use.

### **Policy 7: Wellbeing, Leisure, and Community Facilities**

23. Policy 7 requires development proposals to contribute proportionately towards the provision of leisure and community facilities to meet the needs for future residents.
24. The inspector noted that Table 4: Potential improvements to community facilities, set out within the supporting text of the plan, was not suitably cross referenced in the policy. Therefore, amendments were suggested to address this.

### **Monitoring and Review**

25. The inspector noted that there was not a Monitoring and Review section within the submitted plan. It was his view that the plan would likely need to be reviewed during the plan period, particularly following the anticipated Brentwood local plan early review. The following text was added to the plan as a modification under the new Monitoring and Review heading:

*“The Parish Council will monitor the effectiveness of the policies in this Plan to ensure that they contribute to achieving the Plan’s objectives. However, there is likely to be a necessity to formally review the Plan in due course, particularly following future reviews of the BLP and any relevant changes in national policy.*

*It will be the role of the Parish Council, working with Brentwood Borough Council, to review the Neighbourhood Plan at the appropriate time to ensure that its policies take into account national and local policy, are responsive to climate and other environmental changes and are meeting the vision for the future of Ingatestone and Fryerning.”*

### **Other Matters**

26. The inspector listed additional minor plan modifications under ‘PM9’, consisting of changes / additions such as:
  - a) Ensure all maps have a title;
  - b) Removing the word ‘emerging’ in reference to the Brentwood local plan;
  - c) Ensure correct titles to Essex County Council evidence / document referred to in the plan;
  - d) Ensure page numbering is present on all pages; and
  - e) Remove reference to The Code for Sustainable Homes as this is no longer in force.
27. These amendments have been made to the neighbourhood plan (Appendix C) and the referendum period commenced on 30 June 2022.
28. The referendum vote is scheduled to take place on Thursday 4 August 2022, and provided a majority vote in favour of the plan, the Ingatestone & Fryerning Neighbourhood Plan will then form part of the development plan for the council as local planning authority to take into account when making decisions on planning applications within the parish.

### **Consultation**

29. The neighbourhood plan has been through various stages of public consultation in line with regulatory requirements and will be subject to a referendum vote to determine whether it is ‘made’ (adopted).



## References to Corporate Plan

30. Subject to the upcoming referendum, this neighbourhood plan will form part of the development plan for planning decision making, alongside the council's local plan and other planning documents. Delivery of a local plan is a corporate priority. It provides a blueprint for the delivery of several other corporate objectives. Therefore, it is important that there is consistency between neighbourhood plans and the borough local plan.

## Implications

### Financial Implications

**Name/Title: Jacqueline Van Mellaerts, Corporate Director (Finance & Resources) and Monitoring Officer**

**Tel/Email: 01277 312500/jacqueline.vanmellaerts@brentwood.gov.uk**

31. Government grants and technical support is available directly to neighbourhood planning groups immediately following area designation.
32. Neighbourhood Planning Regulations require that the local planning authority (the council) bear the cost of examination and referendum for neighbourhood plans or orders. Current arrangements from the Department for Levelling Up, Housing and Communities enable local planning authorities to claim some financial support towards neighbourhood planning. Currently, this is £20,000 for each neighbourhood plan once a date has been set for referendum (limited to five neighbourhood plans in the borough). So far, the Council has received £5,000 of grant monies following designation of the Ingatestone & Fryerning Neighbourhood Plan Area. The remaining £15,000 can be claimed upon completion of the referendum.
33. It is estimated that the level of grant that can be claimed in relation to the preparation of the Ingatestone & Fryerning Neighbourhood Plan, will broadly cover expenditure incurred to meet the council's prescribed responsibilities. Any surplus will remain within a ringfenced budget to be spent on the support of neighbourhood planning across the borough.

### Legal Implications

**Name & Title: Amanda Julian, Corporate Director (Law & Governance) and Monitoring Officer**

**Tel & Email: 01277 312500/amanda.julian@brentwood.gov.uk**

34. It is a statutory requirement to support the preparation of neighbourhood plans and for the council to adopt (or 'make') them, if supported by the referendum. Relevant legislation includes the Neighbourhood Planning (General) Regulation

2012 (as amended) and the Town and Country Planning (Use Classes) Order 1987 (as amended).

35. The neighbourhood plan is currently at referendum stage as part of Regulation 19 stage. The council's Elections team is responsible for running the referendum process and is supported by the Planning Policy team.

### **Economic Implications**

**Name/Title: Phil Drane, Corporate Director (Planning & Economy)**

**Tel/Email: 01277 312500/philip.drane@brentwood.gov.uk**

36. The Ingatestone and Fryerning Neighbourhood Plan includes a range of policies that can assist efforts to achieve economic growth, including a specific policy regarding economy (Policy 4). The plan is consistent with the borough local plan, of which an integral part of the strategy is to achieve economic growth. Therefore, subject to the referendum outcome, the development framework for the parish area would be enhanced with an adopted neighbourhood plan and benefit the local economy.

### **Equality and Diversity Implications**

**Name/Title: Kim Anderson, Corporate Manager (Communities, Leisure and Health)**

**Tel/Email: 01277 312500/kim.anderson@brentwood.gov.uk**

37. The Public Sector Equality Duty applies to the council when it makes decisions. The duty requires that the council has regard to the need to:
- a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act. In summary, the Act makes discrimination etc. on the grounds of a protected characteristic unlawful;
  - b) Advance equality of opportunity between people who share a protected characteristic and those who do not; and
  - c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.
38. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, gender, and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a).

**Other Implications** (where significant) – i.e. Health and Safety, Asset Management, Equality and Diversity, Risk Management, Section 17 – Crime & Disorder, Sustainability, ICT.

None

### **Background Papers**

- Item 185, Policy, Resources, and Economic Development Committee, 24 November 2021, Ingatestone & Fryerning Neighbourhood Plan (2020-2033), Regulation 15
- Item 571, Planning & Licensing Committee, 11 November 2020, Response to Ingatestone & Fryerning Draft Neighbourhood Plan Regulation 14 Consultation
- Item 136, Planning & Licensing Committee, 11 October 2017, Ingatestone & Fryerning Parish Neighbourhood Plan Area Designation

### **Appendices to this report**

- Appendix A: Inspectors Report on the Ingatestone & Fryerning Neighbourhood Development Plan (2020-2033), June 2022
- Appendix B: Brentwood Borough Council and Ingatestone & Fryerning Parish Council (Qualifying Body) Response to the Planning Inspector's Questions, May 2022
- Appendix C: Ingatestone & Fryerning Neighbourhood Plan (Referendum version), June 2022

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# **Report on Ingatestone & Fryerning Neighbourhood Development Plan 2020-2033**

**An Examination undertaken for Brentwood Borough Council with the support of Ingatestone & Fryerning Parish Council on the November 2021 Submission version of the Plan.**

Independent Examiner: Derek Stebbing BA (Hons) DipEP MRTPI

Date of Report: 16 June 2022

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## **Main Findings - Executive Summary**

From my examination of the Ingatestone & Fryerning Neighbourhood Development Plan (the Plan) and its supporting documentation including the representations made, I have concluded that subject to the modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- the Plan has been prepared and submitted for examination by a qualifying body – the Ingatestone & Fryerning Parish Council (the Parish Council);
- the Plan has been prepared for an area properly designated – the Ingatestone & Fryerning Neighbourhood Area, as identified on the map at page 7 of the Plan;
- the Plan specifies the period to which it is to take effect – from 2020 to 2033; and,
- the policies relate to the development and use of land for a designated neighbourhood plan area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

## **1. Introduction and Background**

### **Ingatestone & Fryerning Neighbourhood Development Plan 2020-2033**

- 1.1 The Parish of Ingatestone and Fryerning in Brentwood district is located between the town of Brentwood and the city of Chelmsford, close to the A12 trunk road linking London with Colchester, Ipswich and Great Yarmouth. The main railway line between London and Norwich passes through Ingatestone, and the station at Ingatestone has regular services southwards to London and northwards to other parts of Essex. There are local bus services to Brentwood and Chelmsford. These excellent transport links have ensured that Ingatestone is a popular and attractive place of residence for many people commuting to work in London, and also in other parts of Essex.
- 1.2 Both Ingatestone and the smaller village of Fryerning have their origins in the Saxon period when the word 'Ing' meant settlement. Much of the land in Ingatestone was owned by Barking Abbey from around 950AD until the dissolution of the monasteries in 1539. The land was then acquired by Sir William Petre, an influential adviser to King Henry VIII. The Grade I listed Ingatestone Hall was built by Sir William Petre between 1539 and 1556, and his descendants continue to live in the Hall. Ownership of the manor

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of Fryerning passed through several hands until it was acquired by Sir Nicholas Wadham, the founder of Wadham College, Oxford, in 1607. Much of the land around the village continues to be owned by Wadham College.

- 1.3 There are three designated Conservation Areas in the Parish, the High Street and Station Lane Conservation Areas in Ingatestone and the Fryerning Conservation Area in Fryerning. The Parish contains a significant number of designated heritage assets and non-designated heritage assets.
- 1.4 The population of the Parish was 4,785 persons at the 2011 Census within 2,095 households, and the population was estimated to have increased to over 5,000 persons by 2019. Much of the Parish beyond the village of Ingatestone is within the designated Metropolitan Green Belt, which places a major policy constraint upon development in the area. This has ensured that the Parish retains a strong rural character, with attractive landscapes particularly in the northern parts of the Parish around Fryerning and the small hamlets of Mill Green and Beggar Hill where there are several areas of ancient woodland, including parts of the former royal hunting forest known as Writtle Forest. There are 15 designated Local Wildlife Sites within the Parish.
- 1.5 The majority of retail and commercial businesses in the Parish are concentrated in Ingatestone, and the High Street in Ingatestone contains over 100 shops and businesses, together with the Parish church of St. Edmund and St. Mary, dating from the Norman period, plus a range of community buildings.
- 1.6 The civil parish was formed in 1889 by merging the parishes of Ingatestone and Fryerning. The Parish Council is responsible for a wide range of local amenities and community facilities within the Parish, including the recreation facilities at the Fairfield Recreation Ground (which is leased from Lord Petre) and Seymour Field (which is leased from Brentwood Borough Council).
- 1.7 There is an Infants and Junior School in Ingatestone, together with the large Anglo European Secondary School which draws pupils from a large part of Essex. Other children of secondary school age travel outside the Parish mainly to schools in Chelmsford and Brentwood.

#### The Independent Examiner

- 1.8 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Plan by Brentwood Borough Council (the Council), with the agreement of the Parish Council.
- 1.9 I am a chartered town planner, with over 46 years of experience in planning. I have worked in both the public and private sectors and have experience of examining both local plans and neighbourhood plans. I have also served on a Government working group considering measures

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to improve the local plan system and undertaken peer reviews on behalf of the Planning Advisory Service. I therefore have the appropriate qualifications and experience to carry out this independent examination.

- 1.10 I am independent of the qualifying body and the local authority and do not have an interest in any of the land that may be affected by the Plan.

### The Scope of the Examination

- 1.11 As the independent examiner, I am required to produce this report and recommend either:

(a) that the neighbourhood plan is submitted to a referendum without changes; or

(b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or

(c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.

- 1.12 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The examiner must consider:

- Whether the plan meets the Basic Conditions.
- Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
  - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
  - it sets out policies in relation to the development and use of land;
  - it specifies the period during which it has effect;
  - it does not include provisions and policies for 'excluded development'; and
  - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.
- Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) ('the 2012 Regulations').

1.13 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

### The Basic Conditions

1.14 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan for the area;
- be compatible with and not breach European Union (EU) obligations (under retained EU law)<sup>1</sup>; and
- meet prescribed conditions and comply with prescribed matters.

1.15 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the Neighbourhood Plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 ('the Habitats Regulations').<sup>2</sup>

## 2. Approach to the Examination

### Planning Policy Context

2.1 The Development Plan for this part of Brentwood Borough Council (BBC), not including documents relating to excluded minerals and waste development, consists of the adopted Brentwood Local Plan 2016-2033 (BLP) (adopted 23 March 2022).

2.2 The BLP sets out the spatial planning vision and objectives and strategy for the spatial development and growth of the Brentwood district. It contains a suite of strategic policies with the majority of future growth during the period up to 2033 being directed to the Borough's two strategic transit growth corridors, the Central Brentwood Growth Corridor and the

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<sup>1</sup> The existing body of environmental regulation is retained in UK law.

<sup>2</sup> This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

South Brentwood Growth Corridor. In the Plan's settlement hierarchy, Ingatestone is categorised as one of the larger villages in a rural setting, with high levels of accessibility and public transport provision, including rail services. They provide a range of services and facilities to the immediate residential areas and nearby settlements in designated District and Local Centres. Fryerning is categorised as one of the remote and small rural villages and hamlets, with poor public transport, limited or no shops, jobs and community facilities.

- 2.3 The BLP includes development management policies under the themes managing growth, resilient built environment, housing provision, prosperous communities and natural environment. The BLP contains two non-strategic site allocations for residential development in the Ingatestone area, refs. R21 (for 161 new dwellings) and R22 (for 57 new dwellings) and one non-strategic site allocation for employment development, ref. E08. Site R21 is not within the designated Neighbourhood Area, being situated at the south-western edge of Ingatestone within the adjoining parish of Mountnessing. The BLP does not contain any site allocations affecting the smaller village of Fryerning.
- 2.4 The Basic Conditions Statement (at pages 6-19) provides an assessment of how the policies proposed in the Plan have regard to national policy and are in general conformity with the relevant strategic policies in the now superseded adopted Brentwood Replacement Local Plan (BRLP) (2005) and the recently adopted BLP (2022). Having been adopted in 2022, the BLP provides an up-to-date strategic planning context for the Neighbourhood Plan, and the progress of the BLP during 2020-2022 has enabled the Neighbourhood Plan and its policies to be prepared.
- 2.5 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised NPPF was published on 20 July 2021. All references in this report are to the 2021 NPPF and its accompanying PPG.

### Submitted Documents

- 2.6 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:
- the draft Ingatestone & Fryerning Neighbourhood Development Plan 2020-2033 Submission Version (November 2021) and its Appendix;
  - the Strategic Environmental Assessment Screening Opinion Report (July 2021);
  - the Basic Conditions Statement (November 2021);
  - the Consultation Statement (November 2021); and

- all the representations that have been made in accordance with the Regulation 16 consultation.<sup>3</sup>

## Supporting Documents

2.7 I have also considered the various supporting documents to the submission Plan, including:

- Neighbourhood Plan Business Questionnaire Results Report (Rural Community Council of Essex) (December 2018);
- Neighbourhood Plan Household Questionnaire Results Report (Rural Community Council of Essex) (February 2019); and,
- Rural community profile for Ingatestone and Fryerning (Parish) (Action with Communities in Rural England) (ACRE) (October 2013).<sup>4</sup>

## Preliminary Questions

2.8 Following my appointment as the independent examiner and my initial review of the draft Plan, its supporting documents and representations made at the Regulation 16 stage, I wrote to the Council and the Parish Council on 20 April 2022<sup>5</sup> seeking further clarification and information on four matters contained in the submission Plan, as follows:

- firstly, with regard to the Brentwood Local Plan 2016-2033, I noted that the Plan was adopted by the Council on 23 March 2022, which will require a number of consequential amendments to references in the submission Plan (albeit noting the Basic Conditions Statement includes an assessment of the emerging BLP policies as at November 2021). I sought the Council's confirmation that the content of the paragraphs on page 13 in the Plan, and accompanying Map 2 (on page 12), regarding Site R22 remain accurate and up to date regarding the proposed development of 57 dwellings. I also sought confirmation that the correct site allocation reference in the BLP for this site is R22, and that the reference to R21 in the third line of text in the second paragraph (left column) on page 13 is an error and should be R22;
- secondly, with regard to Policy 3, I noted that the Policy refers to the conservation areas "*which are identified on the parish map*". I noted that I do not identify a map or plan within the submission Plan that shows the boundaries of the three designated Conservation Areas and that, in my view, such a map or plan will be necessary to enable future users of the Plan to correctly interpret Policy 3. I therefore invited the Parish Council to provide me with a map(s) (at a suitable scale) clearly showing the boundaries of the three Conservation Areas, which I considered should be placed

<sup>3</sup> View at: <https://www.brentwood.gov.uk/-/ingatestone-and-fryerning-np>

<sup>4</sup> View at: <https://www.ingatestone-fryerningpc.gov.uk/neighbourhood-plan/get-involved>

<sup>5</sup> View at: <https://www.brentwood.gov.uk/-/ingatestone-and-fryerning-np>

within the Heritage section of the Plan, and which I may consider as a potential modification to the Plan;

- thirdly, with regard to Policy 4, I noted that clause (a) of the Policy sets out a range of potential Use Classes that would be supported at employment site allocation ref. E08 (Land adjacent to the A12 and slip road, Ingatestone). I further noted that the uses listed in clause (a) of the Policy do not correspond in full to the uses listed in the preceding paragraph of supporting text, specifically regarding the additional various Class A and Class D uses that are listed in that paragraph. I noted that, in my assessment, the Policy and its supporting justification could lead potentially to some misunderstandings for users of the Plan regarding the extent of proposals which would be supported at this site. I considered that the Policy and its supporting text should better reflect the adopted BLP in order to meet the Basic Conditions. I therefore invited the Parish Council to consider this matter, and if appropriate to provide draft text for suitable amendments to clause (a) of Policy 4 and its supporting justification, to ensure that there is clarity on the nature of the potential uses that will be supported at Site E08, and which I may consider as a potential modification to the Plan; and
- fourthly, with regard to Policy 5, I noted that the supporting justification for this Policy states on page 34 that "*The area of Ingatestone village associated with concerns for the safety of pedestrians, proposed speed reductions and proposed School Clear Zones is identified within Policy 5 as a 'Safe Route'*". I further noted that within the text of the draft Policy there is no specific reference to 'Safe Routes', although there is a more generic reference to safe pedestrian and cycles routes in the 7<sup>th</sup> bullet point of the third paragraph of text. I therefore invited the Parish Council to consider whether the Policy should identify the allocated 'Safe Route' for Ingatestone village more specifically, and if appropriate to provide some suitable text for an additional clause or bullet point that I may consider as a potential modification to the Plan.

2.9 In response to my letter of 20 April 2022, the Council and the Parish Council provided me with a consolidated response to the four questions listed above on 4 May 2022.<sup>6</sup> I have taken full account of the additional information contained in these responses as part of my assessment of the draft Plan, alongside the documents listed at paragraphs 2.6 and 2.7 above.

#### Site Visit

2.10 I made an unaccompanied site visit to the Neighbourhood Plan Area on 15 May 2022 to familiarise myself with it and visit relevant sites and areas referenced in the Plan, evidential documents and representations.

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<sup>6</sup> View at: <https://www.brentwood.gov.uk/-/ingatestone-and-fryerning-np>  
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## Written Representations with or without Public Hearing

2.11 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections and comments regarding the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum. I am satisfied that the material supplied is sufficiently comprehensive for me to be able to deal with the matters raised under the written representations procedure, and that there was not a requirement to convene a public hearing as part of this examination. In all cases, the information provided has enabled me to reach a conclusion on the matters concerned.

## Modifications

2.12 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications in full in the Appendix.

## 3. Procedural Compliance and Human Rights

### Qualifying Body and Neighbourhood Plan Area

- 3.1 The Plan has been prepared and submitted for examination by Ingatestone and Fryerning Parish Council. An application to the Council for the Parish of Ingatestone and Fryerning to be designated a neighbourhood planning area was made on 8 August 2017<sup>7</sup> and was approved by the Council on 11 October 2017, following public consultation.
- 3.2 The designated Neighbourhood Area comprises the whole of the Parish of Ingatestone and Fryerning. The designated area is shown on the map at page 7 in the submission Plan. The Ingatestone and Fryerning Neighbourhood Plan is the only neighbourhood plan in the designated area.
- 3.3 Ingatestone and Fryerning Parish Council is the Qualifying Body for the preparation of the Plan. The preparation of the Plan has been led by a Neighbourhood Plan Advisory Committee (NPAC), which was established in October 2017, with up to 15 members comprising Parish Councillors and a number of local residents.

### Plan Period

3.4 The draft Plan specifies (on the front cover) the period to which it is to take effect, which is for the period 2020 to 2033. The Plan period

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<sup>7</sup> View at: <https://www.brentwood.gov.uk/-/ingatestone-and-fryerning-np>  
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encompasses the plan period for the adopted BLP. I make a recommendation (see paragraph 4.51 below and proposed modification PM8) with regard to the future review of the Plan to take account of future reviews of the BLP by the Council and any relevant changes to national policy.

## Neighbourhood Plan Preparation and Consultation

- 3.5 The Consultation Statement and its Appendices sets out a comprehensive record of the Plan's preparation and its associated engagement and consultation activity between Summer 2017 and Autumn 2021. The decision to undertake the preparation of the Neighbourhood Plan was taken in Summer 2017, with initial meetings of the newly-established NPAC being held in Autumn 2017 following the designation of the Neighbourhood Area. The preparation of the Plan and the associated community engagement and consultation has involved three principal stages, as follows:
- Stage 1: Initial work with the distribution of business and household questionnaires, data collection, local community engagement events, publication of a neighbourhood plan newsletter and public exhibitions of the initial work taking place on the Plan (January-September 2018).
  - Stage 2: Further data collection, social media polls, leading to the pre-submission consultation on the draft Neighbourhood Plan (Regulation 14) (Spring-Autumn 2020).
  - Stage 3: Submission to the Council, Regulation 16 consultation and commencement of the examination (Autumn 2021 to Spring 2022).
- 3.6 During Stage 1, the NPAC worked with the Rural Community Council for Essex (RCCE) to analyse the results of the business and household questionnaires. The reports and analysis of those surveys are contained at Appendices 2 and 3 to the Consultation Statement. At this stage, other engagement events took place, for example a discussion with students at the Anglo European School, a roadshow event at the Ingatestone Community Club alongside a consultation on the emerging Brentwood Local Plan, and displays at other local community events in both Ingatestone and Fryerning.
- 3.7 During Stage 2, work was focused on further targeted surveys, particularly using social media polls, in order to inform the development of draft policies in the Plan. The draft Plan was then prepared for Regulation 14 consultation, which took place between 1 September and 31 October 2020. The consultation was accompanied by extensive local publicity, with details being distributed to every household in the Parish, together with separate notifications to local businesses, statutory consultees and other stakeholders. Appendices 5-7 to the Consultation Statement set out the list of statutory consultees, a copy of the statutory consultation letter and a review of each of the 132 comments received during the consultation period.



- 3.8 Work during Stage 3 then focused on preparing the draft Plan and its supporting documents for formal submission to the Council for examination, with a number of amendments and additions to the content of the Plan being made to take account of Regulation 14 consultation responses. Appendix 7 to the Consultation Statement sets out the actions taken by the NPAC with regard to each of those responses.
- 3.9 The Consultation Statement provides a full record of the consultation and engagement work that was undertaken during the preparation of the Plan prior to its submission to the Council, including at Appendix 1 a copy of the Community Engagement Strategy that was prepared to guide and monitor the process of community and stakeholder engagement at each stage of the Plan's preparation.
- 3.10 The Parish Council duly resolved at its meeting held on 4 November 2021 to submit the Plan to the Council for examination under Regulation 15, and the Plan was then formally submitted on 17 November 2021 and formally accepted at the meeting of the Council's Policy, Resources and Economic Development (PRED) Committee held on 24 November 2021. Regulation 16 consultation was then held for a period of thirteen weeks from 16 December 2021 to 17 March 2022. I have taken account of the responses received<sup>8</sup>, as well as the published Consultation Statement. I am satisfied that a transparent, fair and inclusive consultation process has been followed for the Plan, that has had regard to advice in the PPG on plan preparation and engagement and is procedurally compliant in accordance with the legal requirements.

### Development and Use of Land

- 3.11 I am satisfied that the draft Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act.

### Excluded Development

- 3.12 From my review of the documents before me, the draft Plan does not include policies or proposals that relate to any of the categories of excluded development.<sup>9</sup>

### Human Rights

- 3.13 Neither the Council nor any other party has raised any issues concerning a breach of, or incompatibility with Convention rights (within the meaning of the Human Rights Act 1998). From my assessment of the Plan, its accompanying supporting documents and the consultation responses made to the Plan at the Regulations 14 and 16 stages, I am satisfied that

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<sup>8</sup> View at:

<https://www.brentwood.gov.uk/documents/20124/539377/IFNP+Regulation+16+Reps+Received.pdf>

<sup>9</sup> The meaning of 'excluded development' is set out in s.61K of the 1990 Act.

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the Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act 1998. I consider that none of the objectives and policies in the Plan will have a negative impact on groups with protected characteristics. Many will have a positive impact.

## **4. Compliance with the Basic Conditions**

### EU Obligations

- 4.1 The Council issued a Strategic Environmental Assessment (SEA) Screening Opinion report (prepared by AECOM) in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations') in July 2021, and this was prepared on the basis of the policies contained in the pre-submission draft Plan and followed the Regulation 14 consultation in September-October 2020. This Screening Opinion is submitted alongside the draft Plan and concluded (at Section 4) that the policies in the pre-submission draft Plan are not likely to have significant environmental effects on the environment, and therefore that a full SEA is not deemed to be required. The Screening Opinion report was the subject of consultation with the Environment Agency, Natural England and Historic England during July 2021 (and the responses from those bodies are summarised at Appendix 8 to the Consultation Statement).
- 4.2 I have considered the SEA screening methodology and assessment set out in the Screening Opinion report (at Section 3) by which the Plan was duly screened to determine whether the Plan is likely to have potential environmental effects. Overall, I am satisfied that a proportionate approach has been taken and that the Plan was screened to take full account of any potential effects upon interests of environmental, landscape, historic and heritage importance.
- 4.3 Consideration of Habitats Regulations Assessment (HRA) under the Habitats Regulations was also considered by the Council, albeit a formal screening was not produced on the draft Plan. This is because the Basic Conditions Statement (at Section 6) notes that, based upon the conclusions of the HRA undertaken as part of the preparation of the BLP, only new development proposals to the east of Ingatestone village within the 22 kilometres Zone of Influence for recreational pressure within the Blackwater Estuary Ramsar site and Special Protection Area (SPA) and the Essex Special Area of Conservation (SAC), would require a HRA Screening Assessment to be undertaken. AECOM advised that there would be no pathway of impact to those European sites emerging from the Plan, and therefore a HRA Screening Assessment would not be required. I concur with that assessment.
- 4.4 Therefore, I consider that on the basis of the information provided and my independent consideration of the SEA Screening Opinion report, the Basic

Conditions Statement and the Plan itself, I am satisfied that the Plan is compatible with EU obligations under retained EU law.

## Main Assessment

- 4.5 The NPPF states (at paragraph 29) that *“Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan”* and also that *“Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”*. The NPPF (at paragraph 11) also sets out the presumption in favour of sustainable development. It goes on to state (at paragraph 13) that neighbourhood plans should support the delivery of strategic policies contained in local plans; and should shape and direct development that is outside of these strategic policies.
- 4.6 Having considered above whether the Plan complies with various legal and procedural requirements, it is now necessary to deal with the question of whether it complies with the remaining Basic Conditions (see paragraph 1.14 of this report), particularly the regard it pays to national policy and guidance, the contribution it makes to sustainable development and whether it is in general conformity with strategic development plan policies.
- 4.7 I test the Plan against the Basic Conditions by considering specific issues of compliance of the Plan’s seven policies, which address the following themes: Housing; Housing Design; Heritage; Economy; Transport; Environment; and Wellbeing, Leisure and Community Facilities. As part of that assessment, I consider whether the policies in the Plan are sufficiently clear and unambiguous, having regard to advice in the PPG. A policy should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.<sup>10</sup> I recommend some modifications as a result.

## Overview

- 4.8 The Plan is addressing the period from 2022 to 2033 and seeks to provide a clear planning framework to allow development within Ingatestone and Fryerning to take place in an appropriate way for the Parish, whilst guiding and managing future growth, protecting the character and history of the Parish, promoting a flourishing local economy and containing policies that seek to have a positive effect on the environment. The Plan contains specific policies in respect of each of the themes listed above.

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<sup>10</sup> PPG Reference ID: 41-041-20140306.

- 4.9 The opening section of the Plan sets out the Vision Statement for the Plan which is:

*“Ingatestone and Fryerning are vibrant and distinctive rural villages with easy access to fields and the countryside. We strive to respect and reflect the views of our communities, to evolve and expand whilst retaining our unique and distinctive character and to provide a good quality of life for current and future generations of residents.”*

This is followed by the various actions that are proposed by the Parish Council to support the Vision of the Plan.

- 4.10 The Introduction to the Plan provides a synopsis of the neighbourhood planning process undertaken in Ingatestone and Fryerning following the designation of the Parish as a Neighbourhood Area in October 2017. It also describes the relevant spatial planning context for the Brentwood Borough area. The Local Planning Context section of the Introduction will require some updating following the recent adoption of the BLP, and this is addressed by recommended modification PM9 (see paragraph 4.52 below).
- 4.11 The Introduction is then followed by separate policy sections of the Plan. These address Housing, Housing Design, Heritage, Economy, Transport, Environment and Wellbeing, Leisure and Community Facilities. Then follows a Glossary of Terms and an Appendix setting out the various documents and supporting studies that have been used to inform and help produce the draft Plan, including those listed at paragraph 2.7 above.
- 4.12 The policy sections (with the exception of Housing Design) each contain a vision and relevant Objectives that are appropriate to the topic concerned, together with a comprehensive description of the context, in terms of the local factors and issues, that lead to each of the proposed Policies. Each section contains a short summary of how community involvement and engagement in the Plan has further informed the Plan-making process and the specific Policies concerned.
- 4.13 The Basic Conditions Statement (at Sections 4 and 5) describes how the Plan, and its objectives and policies, has regard to national policies contained in the NPPF, generally conforms with local strategic planning policies and contributes to the achievement of sustainable development. Pages 9-19 of the Basic Conditions Statement set out in detail how each of the Plan’s seven policies are in general conformity with the strategic policies in the former, and now superseded, Brentwood Replacement Local Plan and the then emerging, and since adopted, BLP.
- 4.14 I consider that overall, subject to the specific modifications that I recommend to specific policies below, that individually and collectively the Plan’s policies will contribute to the achievement of sustainable patterns of development in the Parish. There are also a small number of detailed matters which require amendment to ensure that the policies have the

necessary regard to national policy and are in general conformity with the strategic policies of the Council. Accordingly, I also recommend modifications in this report in order to address these matters.

## Specific Issues of Compliance

4.15 I turn now to consider each of the proposed policies in the draft Plan, which are contained in the policy sections described above. I have taken into account, where appropriate, the representations that have been made concerning the policies, which lead, in some instances, to recommended modifications to the draft Policies.

## Housing

4.16 The Housing policy section of the Plan contains two Objectives related to the Vision Statement, which are:

- Supporting measured, proportionate, timely and sustainable development to meet local requirements, particularly those of our young people and older residents; and
- Influence key 'age friendly' issues, including housing.

4.17 A further four housing-related objectives have been identified by the NPAC to guide the Plan's housing policies. In summary, these seek to promote an integrated approach to achieving sustainable and quality residential environments; to promote the comprehensive planning and development of residential areas; to ensure that adequate provision is made for infrastructure and appropriate local neighbourhood facilities; and to promote quality residential development that creates attractive and distinctive places, respects and enhances features of value and local character and reduces reliance on the private car.

4.18 The Plan takes account of the two housing allocation sites (sites R21 and R22) contained in the adopted BLP, which are shown on Map 2 in the Plan. However, in the case of site R22, Policy 1 (Housing) in the Plan sets out more detailed site-planning requirements than those identified in the BLP. I have given careful consideration to those additional planning requirements and the representations made, noting also that the Council did not comment in this regard. I have concluded that the Policy is appropriate and justified in seeking to ensure that a high-quality residential environment is created at site R22 in accordance with the Plan's objectives.

4.19 As noted at paragraph 2.8 above, as one of my questions to the Council, following my initial assessment of the draft Plan, I sought confirmation that, following the recent adoption of the BLP, the proposed development of 57 new dwellings at site R22 remains an accurate figure. I also noted an apparent typographic error in the supporting justification to Policy H1. The Council responded to me on 4 May 2022 confirming that the site is allocated for the development of 57 dwellings, but also advising me that

two corrections are necessary to the text of the supporting justification for Policy 1, including the error identified in my question. These corrections are addressed as part of recommended modification **PM1** (see paragraph 4.22 below).<sup>11</sup>

- 4.20 Policy 1 (Housing) contains three separate parts. Part a) addresses the allocation of site R22 in the adopted BLP, and the specific planning requirements for the development of the site, as discussed at paragraph 4.19 above. Part b) sets out the requirement for planning contributions to be sought for the provision of the necessary infrastructure improvements, in terms of education facilities, open space and community facilities, arising from the development of site R22 and its impacts on the surrounding area. Part c) states that other proposals for new residential development in the Plan area will be supported where they meet and achieve twelve planning criteria set out as part of the Policy, that reflect the Plan's vision and objectives for securing high-quality residential developments.
- 4.21 I have given very detailed consideration to the draft Policy. Overall, I consider that the Policy is well drafted and provides clear and appropriate guidance for the consideration of proposals for future residential development in the Plan area. However, I have noted that Essex County Council, as part of their representations to the Plan, have sought some minor amendments and additions to the text of the Policy and its supporting justification, generally for improved clarity for future users of the Plan, which together with the corrections referenced in paragraph 4.19 above, are all addressed by recommended modification **PM1**.
- 4.22 With recommended modification PM1, I consider that the draft Plan's section on Housing and its accompanying policy (Policy 1) is in general conformity with the strategic policies of the adopted BLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

## Housing Design

- 4.23 The Housing Design policy section of the Plan does not set out any specific Objectives but instead takes account of the National Design Guide (MHCLG, 2019) and its statement that "*creating high quality buildings and places is fundamental to what the planning and development process should achieve. The long-standing fundamental principles for good design are that it is: fit for purpose: durable: and brings delight.*" This section of the Plan also endorses the aims of the Essex Design Guide in promoting a high standard of design within new development.
- 4.24 Policy 2 (Housing Design) is in three parts. Part A sets out 17 planning criteria which development proposals in the Plan area should seek to

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<sup>11</sup> Modifications for the purpose of correcting errors is provided for in Paragraph 10(3)(e) of Schedule 4B to the 1990 Act.

achieve in the design of new housing, covering matters such as sustainable drainage systems, energy efficiency, off-street car parking, on-site waste storage facilities, the preservation of local landmarks, open space and green infrastructure and tree planting. These criteria reflect the Plan's objectives to achieve high-quality design in new residential developments. Part B states that new proposals for older people's housing should demonstrate how the principles of the 'Housing our Ageing Population: Panel for Innovation' (HAPPI) reports have been incorporated into the design of the development. Part C of the Policy states that all non-residential development should achieve a minimum of BREEAM 'very good' rating in terms of a building's environmental performance.

- 4.25 I have given careful consideration to the Policy text and have taken into account the representations that have been made concerning the Policy. I am satisfied that the Policy is justified and seeks to achieve high standards of housing design. However, I do consider that some minor amendments are necessary to improve the clarity of the Policy for future users of the Plan. In particular, as the Policy does also include design criteria for non-residential developments, I consider that the title of the Policy should be amended to make it clear that it relates to the design of new development in the Plan area, rather than just residential development. I therefore recommend modification **PM2** to address the various amendments to the Policy.
- 4.26 With recommended modification PM2, I consider that the draft Plan's section on Housing Design and its accompanying policy (Policy 2) is in general conformity with the strategic policies of the adopted BLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

## Heritage

- 4.27 The Heritage policy section of the Plan contains a single Objective, which is:
- To conserve and enhance the historic environment within the Parish.
- 4.28 Policy 3 (Heritage) has two parts. Part a) states that development within Conservation Areas should demonstrate how the proposals will protect and where possible enhance the character, appearance, setting and historic interest of the Conservation Area. Part b) states that development proposals should seek to protect and where appropriate enhance heritage assets within the Parish. Proposals which affect a designated or non-designated heritage asset should also outline the historical significance of the asset to the character and appearance of Ingatstone and Fryerning and should clearly outline the impacts of the proposed development on the significance and local importance of such assets.

- 4.29 Upon my initial assessment of the Plan, I noted that the three designated Conservation Areas within the Plan area are not identified on a map or plan within the Plan. I consider that Policy 3 requires the boundaries of those Conservation Areas to be shown on maps of a suitable scale within the Plan, in order that users of the Plan can correctly interpret the Policy. Accordingly, in response to my question on this matter (see paragraph 2.8 above), the Parish has provided suitable maps of each Conservation Area as an Appendix to their response.
- 4.30 I consider that the three maps provided by the Parish Council should be included as additional Appendices to the Plan, with appropriate cross-references being made to the Policy text and to its supporting justification. These matters are addressed by recommended modification **PM3**.
- 4.31 With recommended modification PM3, I consider that the draft Plan's section on Heritage and its accompanying policy (Policy 3) is in general conformity with the strategic policies of the adopted BLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

## Economy

- 4.32 The Economy policy section of the Plan contains five Objectives, which are:
- Supporting measured, proportionate, timely and sustainable development to meet local requirements, particularly those of our young people and older residents.
  - Promoting a flourishing local economy with a range of successful independent businesses.
  - As an existing commuter village, Ingatestone will increase its local employment base with the aim of reducing its export of people.
  - The growing population of the Parish will be supported with employment sites, appropriate retail outlets and a thriving economy.
  - The Parish will have the transport connections, available space, facilities and infrastructure to support new and expanding businesses as and when the need arises and the Parish Council will be active in searching out opportunities for bringing new employment to Ingatestone and Fryerning.
- 4.33 Policy 4 (Economy) has four parts. Part a) identifies and supports the employment land allocation (ref. Site E08) contained in the adopted BLP for the development of land totalling 2.08 hectares adjacent to the A12 road and its slip road at Ingatestone for employment uses. The site is identified on Map 6, although this is not cross-referenced within the Policy. Part b) states that the Parish Council will be supportive of proposals which increase employment opportunities in the local area and support the local economy. It sets out eight criteria for the assessment of employment generating development proposals, in order to ensure that such proposals enhance the local economy in an appropriate and



sustainable manner. Part c) states that parts of Ingatestone High Street are designated as Primary Retail Frontage Areas in the adopted BLP and that development proposals which support retail and ancillary uses on ground floors in this area will be supported. Part d) states that the design of shopfronts in the Primary Retail Frontage Areas should seek to maintain and enhance the character of Ingatestone High Street

- 4.34 Upon my initial assessment of the Plan, I noted that the potential employment uses that would be supported at the employment land allocation (re. Site E08) do not correspond in full to the uses listed in the supporting justification for Policy 4. In my assessment, the Policy and its supporting justification as drafted could therefore lead to some potential misunderstandings for users of the Plan, and I considered that the Policy and its supporting text should better reflect the adopted BLP regarding the future development of Site E08. I therefore invited the Parish Council to consider the matter and, if appropriate, to provide draft text for suitable amendments to part a) of the Policy and the supporting justification (see paragraph 2.8 above). I have taken account of the Parish Council's response dated 4 May 2022 in assessing the Policy.
- 4.35 I am satisfied that the Policy is justified and accords with the Plan's objectives to promote a flourishing local economy in the Plan area. However, some amendments are necessary to ensure that it meets the Basic Conditions, particularly in respect of its general conformity with the adopted BLP. These amendments are addressed by recommended modification **PM4**.
- 4.36 With recommended modification PM4, I consider that the draft Plan's section on Economy and its accompanying policy (Policy 4) is in general conformity with the strategic policies of the adopted BLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

## Transport

- 4.37 The Transport policy section of the Plan contains seven Objectives, which are:
- Giving consideration to effective transport links, the staffed train station, the bus service and access routes for the movement of cyclists and pedestrians.
  - To reduce the rate and incidence of congestion.
  - To enhance accessibility to key services and facilities within the Parish.
  - To improve safety on the road network and to enhance and promote a safer travelling environment around the Parish.
  - To manage the impact of road transport on air pollution.
  - To maintain highways and public rights of way to a standard appropriate to their use.
  - To support and encourage new technologies such as autonomous vehicles and electric charging points.

- 4.38 Policy 5 (Transport) is a lengthy policy covering a number of transport-related matters. It states that proposals that provide or contribute towards new or improved car parking provision in Ingatestone will be supported and also that proposals for new or improved bridleways, pedestrian and cycle routes linking Ingatestone and Fryerning, and within the settlements of Ingatestone, Fryerning and Mill Green, will be supported.
- 4.39 The second part of the Policy sets out a series of twelve criteria for the assessment of the transport-related considerations in proposals for new development in the Plan area, and that major development proposals should assess the impact of the scheme on local highway capacity and public transport services. Finally, the Policy states that proposals which improve the safety of pedestrians and cyclists will be encouraged and supported.
- 4.40 Upon my initial assessment of the Plan, I noted that the supporting justification (on page 34) for the Policy referred to a 'Safe Route' for pedestrians being identified within Ingatestone village, but that the Policy itself made no specific reference to that 'Safe Route'. I therefore invited the Parish Council to consider this issue (see paragraph 2.8 above), and if appropriate to provide some suitable text for an additional clause that may be inserted into the text of the Policy. I have taken account of the Parish Council's response on this matter dated 4 May 2022 which proposes some amendments to the Policy's supporting justification, rather than to the Policy itself.
- 4.41 I have also taken into consideration the representations that have been made concerning the Policy, particularly those made by Essex County Council as the Highways and Transportation authority.
- 4.42 Overall, I am satisfied that the principles of this Policy are justified. However, I consider that the text of the Policy should be re-structured, as the existing second part of the Policy constitutes the most important part for the assessment of development proposals within the Plan area, and that other elements of the Policy are of lesser precedence in that context. Furthermore, Essex County Council is seeking a number of amendments to the Policy, to appropriately reflect its established policies. I therefore recommend proposed modification **PM5** which consolidates the various amendments to the Policy and its supporting justification.
- 4.43 With recommended modification PM5, I consider that the draft Plan's section on Transport and its accompanying policy (Policy 5) is in general conformity with the strategic policies of the adopted BLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

## Environment

- 4.44 The Environment policy section of the Plan contains four Objectives, which are:
- To maintain and protect the natural environment and green space within the Parish.
  - To enhance the biodiversity of the Parish.
  - To reduce carbon emissions within the Parish in order to combat climate change.
  - To ensure all residents living within the Parish breathe clean air.
- 4.45 Policy 6 (Environment) is also a lengthy policy covering a very wide range of environmental matters. Whilst I am satisfied that the Policy is fully justified, and reflects not only the objectives of the Plan but also national policies and the strategic policies of the adopted BLP, the length of the draft Policy and the breadth of issues covered makes it difficult for future users of the Plan to interpret and fully understand. I therefore consider that, as with Policy 5, the text of this Policy necessitates being re-structured to secure its legibility. I also take into account the representations that have been made concerning the Policy and, where appropriate, recommend some amendments to ensure that the Policy and its supporting justification is entirely accurate. **(PM6)**
- 4.46 With recommended modification PM6, I consider that the draft Plan's section on Environment and its accompanying policy (Policy 6) is in general conformity with the strategic policies of the adopted BLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

## Wellbeing, Leisure and Community Facilities

- 4.47 The Wellbeing, Leisure and Community Facilities policy section of the Plan contains two Objectives, which are:
- Supporting measured, proportionate, timely and sustainable development to meet local requirements, particularly those of our young people and older residents.
  - Influence key 'age friendly' issues e.g. community safety, housing, planning, street lighting, green spaces, playing fields and parks, community centres, war memorials, seats and shelters, public toilets.
- 4.48 Policy 7 (Wellbeing, Leisure and Community Facilities) states that development proposals should contribute proportionately towards the provision of leisure and community facilities within the Parish to meet the needs of the future residents of those developments. It goes on to state that development proposals which would result in the net loss of existing community facilities or public open space will only be supported where it can be demonstrated that the benefits of the project outweigh any identified harm created by the loss or that the facility is no longer viable or in active use and has no prospect of being brought back into use.

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- 4.49 I am satisfied that the Policy is justified and is consistent with current national policy and guidance particularly in respect of seeking appropriate contributions towards the provision of community infrastructure, and therefore sustainable patterns of development. However, there is not a suitable cross-reference to Table 4 in the supporting justification to the Policy, and I address this point by recommended modification **PM7**.
- 4.50 With recommended modifications PM7, I consider that the draft Plan's section on Wellbeing, Leisure and Community Facilities and its accompanying policy (Policy 7) is in general conformity with the strategic policies of the adopted BLP, has regard to national guidance, would contribute to the achievement of sustainable development and so would meet the Basic Conditions.

### Monitoring and Review

- 4.51 There is the likelihood that there will be a need to formally review the Plan during the Plan period, particularly following an anticipated forthcoming review of the BLP. The Plan does not at present include a clear statement regarding the monitoring and review of the Plan, and I consider that the Introduction should contain an additional sub-section addressing this matter, to indicate that the Plan will be subject to review at regular intervals up to 2033 to ensure that its policies continue to take into account national and local policy, are responsive to climate and other environmental changes and are meeting the overall strategic vision for the future of Ingatestone and Fryerning. I therefore recommend modification **PM8** to address the matter.

### Other Matters

- 4.52 The Plan contains a number of statements and references which need to be updated or amended as result of the formal adoption of the BLP on 23 March 2022. Additionally, there are a number of minor errors in the text of the Plan which should be corrected. Recommended modification **PM9** identifies the relevant parts of the Plan where such corrections should be made.
- 4.53 Other minor, non-material changes that may be identified following examination can be undertaken by the Council and Parish Council.<sup>12</sup> As an advisory comment, when the Plan is being redrafted to take account of the recommended modifications in this report, it should be re-checked for any typographical errors and any other consequential changes, etc.

### Concluding Remarks

- 4.54 I conclude that, with the recommended modifications to the Plan as summarised above and set out in full in the accompanying Appendix, the

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<sup>12</sup> PPG Reference ID: 41-106-20190509.

Ingatstone & Fryerning Neighbourhood Plan 2020-2033 meets the Basic Conditions for neighbourhood plans.

## 5. Conclusions

### Summary

- 5.1 The Ingatstone & Fryerning Neighbourhood Plan 2020-2033 has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard to all the responses made following consultation on the Plan, and the supporting documents submitted with the Plan together with the Parish and Council's responses to my questions.
- 5.2 I have made recommendations to modify certain policies and other matters to ensure that the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

### The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. I conclude that the Ingatstone & Fryerning Neighbourhood Plan 2020-2033, as modified, has no policy or proposal which I consider to be significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond that boundary. I therefore recommend that the boundary for the purposes of any future referendum on the Plan, should be the boundary of the designated Neighbourhood Plan Area.

### Overview

- 5.4 It is clear that the Ingatstone & Fryerning Neighbourhood Plan is the product of much hard work undertaken since 2017 by the Parish Council, its Neighbourhood Plan Advisory Committee and the many individuals and stakeholders who have contributed to the preparation and development of the Plan. In my assessment, the Plan reflects the land use aspirations and objectives of the Ingatstone & Fryerning community for the future planning of their Parish up to 2033. The output is a clear and well-drafted Plan which should help guide the area's development over that period, making a positive contribution to informing decision-making on planning applications by Brentwood Borough Council.

*Derek Stebbing*

Examiner

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## Appendix: Modifications

Proposed modification number (PM)	Page no./ other reference	Modification
PM1	Pages 13 and 14	<p><u>Housing</u></p> <p>Page 13 - left column – 2<sup>nd</sup> paragraph, 3<sup>rd</sup> line of text – replace “R21” with “R22”.</p> <p>Page 13 – right column - 5<sup>th</sup> paragraph – replace the first sentence with the following text:</p> <p><b>“BBC has proposed an affordable housing requirement of 35% on proposed developments of 10 or more (net) units.”</b></p> <p><u>Policy 1</u></p> <p>Part a) – first sentence – amend to read as follows:</p> <p><b>“The Plan allocates site R22 (Land adjacent to the A12, Ingatestone), as included in the adopted Brentwood Local Plan 2016-2033 and shown on Map 2, for the development of 57 new dwellings.”</b></p> <p>Part a) – 5<sup>th</sup> bullet point - amend to read as follows:</p> <p><b>“Provide street tree planting as recommended within the Essex County Council Material Guide: Design and Good Practice 2012, together with proposals for the satisfactory long-term maintenance of newly-planted trees.”</b></p> <p>Part b) – add additional bullet points, as follows:</p> <ul style="list-style-type: none"> <li>• <b>“Highways and transportation provision</b></li> <li>• <b>Flood and water management</b></li> <li>• <b>Digital infrastructure</b></li> <li>• <b>Energy and environmental provision”</b></li> </ul>

		<p>Part c) - 5<sup>th</sup> bullet point - amend to read as follows:</p> <p><b>“Is accessible to local services and facilities by good quality walking and cycling routes, including where necessary new connections to the existing walking and cycling network.”</b></p> <p>Part c) – 9<sup>th</sup> bullet point - amend to read as follows:</p> <p><b>“Provides parking in accordance with the Essex County Council Parking Standards – Design and Good Practice (2009), or as subsequently amended.”</b></p>
PM2	Page 17	<p><u>Housing Design</u></p> <p><u>Policy 2</u></p> <p>Amend title of Policy to <b>“Design of New Developments”</b> (with a similar amendment to the Contents on Page 3).</p> <p>Part A – 7<sup>th</sup> bullet point - add the words <b>“and water quality”</b> after the word “source” in the second line of text.</p> <p>Part A – 16<sup>th</sup> bullet point – delete existing text and replace with the following:</p> <p><b>“Incorporate sustainable design features which promote energy efficiency and conservation, renewable energy generation, innovative low carbon technology, water efficiency, flood resilience, biodiversity gains and sustainable waste and mineral management. Proposals should take account of the relevant recommendations of the Essex Climate Action Commission (ECAC) report ‘Net Zero: Making Essex Carbon Neutral’ in the design of new developments.”</b></p> <p>Part A – delete final bullet point (which duplicates part of the 7<sup>th</sup> bullet point)</p>
PM3	Pages 19-21	<p><u>Heritage</u></p>

		<p>Page 19 – right column – 2<sup>nd</sup> paragraph – add the words “<b>shown on the map at Appendix 2</b>” after the words “High Street Conservation Area” in the first line of text.</p> <p>Page 19 – right column – 3<sup>rd</sup> paragraph – add the words “<b>shown on the map at Appendix 3</b>” after the words “Station Lane Conservation Area” in the first line of text.</p> <p>Page 20 – left column – 2<sup>nd</sup> paragraph - add the words “<b>as shown on the map at Appendix 4</b>” after the word “Fryerning” in the first line of text.</p> <p>Include the maps of the Ingatestone High Street Conservation Area, the Station Lane Conservation Area and the Fryerning Conservation Area (as contained in the response from the Parish Council dated 4 May 2022<sup>13</sup>) as new Appendices 2, 3 and 4 respectively, and amend the Contents on page 4 accordingly.</p> <p><u>Policy 3</u></p> <p>Amend the text of part a) to read as follows:</p> <p><b>“Development within the three Conservation Areas within the Plan area, which are shown on the maps at Appendices 2-4, should demonstrate how the proposals will protect and where possible enhance the character, appearance, setting and historical interest of the Conservation Area.”</b></p>
PM4	Page 29	<p><u>Economy</u></p> <p>Page 29 – left column – 3<sup>rd</sup> paragraph – replace the existing seven bullet points with the following:</p> <ul style="list-style-type: none"> <li>• <b>“Financial services (E(c)(i) use)</b></li> <li>• <b>Professional services (E(c)(ii) use)</b></li> <li>• <b>Gymnasium (E(d) use)</b></li> </ul>

<sup>13</sup> View at: <https://www.brentwood.gov.uk/-/ingatestone-and-fryerning-np>



		<ul style="list-style-type: none"> <li>• <b>Managed Shared Office (B1 use)</b></li> <li>• <b>Retail (E(a) use)</b></li> <li>• <b>Medical or Health services (E(e) use)</b></li> <li>• <b>Offices with administrative functions (E(g)(i) use)</b></li> <li>• <b>Storage or distribution (B8 use)</b></li> </ul> <p><u>Policy 4</u></p> <p>Part a) – Insert the words <b>“as shown on Map 6”</b> at the end of the first sentence.</p> <p>Part a) – first bullet point – amend “principle” to <b>“principal”</b>.</p> <p>Part a) – second bullet point – delete existing text and replace with:</p> <p><b>“E(a-f) and ancillary uses, where it is demonstrated that the location of these uses will not inhibit the operation of the principal uses on the site.”</b></p> <p>Part b) – add new 8<sup>th</sup> bullet point, as follows:</p> <ul style="list-style-type: none"> <li>• <b>“Provide appropriate surface water management in accordance with the LLFA’s Sustainable Drainage Systems (SuDS) Design Guide.”</b></li> </ul>
PM5	Pages 34, 35 and 36	<p><u>Transport</u></p> <p>Page 34 -right column – 2<sup>nd</sup> paragraph – add new final sentence, as follows:</p> <p><b>“Any changes to speed limits will need to be compliant with the Essex County Council Speed Management Strategy and will require the support of the County Council and Essex Police.”</b></p> <p>Page 34 – right column - 4<sup>th</sup> paragraph – delete existing text and replace with:</p> <p><b>“The IFNP questionnaire identified pedestrian safety as a concern. As identified in Table 1, there are some areas within the Parish boundary where safety concerns have been identified. The Parish Council will seek opportunities to improve safety for pedestrians and cyclists where possible, including the provision of:”</b>.</p>

		<p>Page 35 – Table 2 – left column – delete the words “Ingatestone Safe Route, including” and replace with <b>“Ingatestone pedestrian and cyclist safety improvements, including”</b>.</p> <p><u>Policy 5</u></p> <p>3<sup>rd</sup> paragraph – delete 3<sup>rd</sup> and 8<sup>th</sup> bullet points</p> <p>3<sup>rd</sup> paragraph – amend 7<sup>th</sup> bullet point to insert the words <b>“and infrastructure”</b> after “public transport improvements”.</p> <p>4<sup>th</sup> paragraph – Replace the words “Major development (10 dwellings or more) proposals” and also reference no. 27 and replace with <b>“Development proposals for 25 or more dwellings”</b>. (Note – this amendment is to reflect Essex County Council’s Development Management policy).</p> <p>Re-structure the Policy text, as amended by the above revisions, such that the existing 3<sup>rd</sup> and 4<sup>th</sup> paragraphs become the 1<sup>st</sup> and 2<sup>nd</sup> paragraphs respectively, the existing 5<sup>th</sup> paragraph becomes the 3<sup>rd</sup> paragraph, the existing 2<sup>nd</sup> paragraph becomes the 4<sup>th</sup> paragraph and the existing 1<sup>st</sup> paragraph becomes the 5<sup>th</sup> paragraph.</p>
PM6	Pages 40 and 42	<p><u>Environment</u></p> <p>Page 40 – right column – 1<sup>st</sup> paragraph – delete final sentence.</p> <p>Page 40 – right column – add new 2<sup>nd</sup> paragraph to read as follows:</p> <p><b>“Ingatestone and Fryerning falls within a zone of influence where additional residential development may increase visitor numbers to sensitive coastal areas, potentially increasing disturbance to birds and their habitats. An Essex-wide strategy (called the Recreation disturbance Avoidance and Mitigation Strategy, or RAMS) has been prepared, identifying the potential for disturbance and the types of mitigation that might be needed. Requirements are set out in Policy NE02 of the adopted BLP, and</b></p>

		<p><b>contributions will be secured from qualifying developments in the Plan area towards mitigation measures in accordance with the RAMS.”</b></p> <p>In addition, the RAMS should be listed in the References (with an appropriate reference number linked to the above text) and in the Glossary.</p> <p>(<u>Note</u> – the above amendments relate to the first Page 40).</p> <p>Page 40 – left column – add new 4<sup>th</sup> paragraph as follows:</p> <p><b>“Development proposals in the Parish will also need to take account of the Government’s net-zero carbon targets and standards, and the relevant recommendations of the Essex Climate Action Commission (ECAC) report ‘Net Zero: Making Essex Carbon Neutral’.”</b></p> <p>Page 40 – right column – add new 6<sup>th</sup> and 7<sup>th</sup> paragraphs as follows:</p> <p><b>“There are two Critical Drainage Areas (CDA) within the Parish. Any development within the CDA’s should be directed away from areas of existing flooding and where possible should seek to have a positive impact on existing areas of flood risk downstream of the development. Early engagement with Essex County Council as Lead Local Flood Authority (LLFA) and consideration of the most up-to-date Surface Water Management Plan (SWMP) Action Plan is critical to ensure that existing and potential flood risk is properly managed.</b></p> <p><b>Development should be designed to manage surface water at its source and water quality using a variety of SuDS methods such as infiltration, interception, rainwater harvesting and greywater recycling, which include source control features such as permeable paving, water butts, rain gardens, green roofs and site</b></p>
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		<p><b>control features such as swales, ponds and detention basins.”</b></p> <p>(Note – the above amendments relate to the second Page 40).</p> <p><u>Policy 6</u></p> <p>5<sup>th</sup> paragraph – 3<sup>rd</sup> bullet point - add the words <b>“including proposals for the long-term maintenance of newly-planted trees”</b> at the end of the existing text.</p> <p>5<sup>th</sup> paragraph – 5<sup>th</sup> bullet point - add the words <b>“net-zero carbon standards”</b> after the word “promote” in the 1<sup>st</sup> line of text, and <b>“renewable energy generation,”</b> after the words “ and efficiency,” in the 4<sup>th</sup> line of text.</p> <p>5<sup>th</sup> paragraph – final bullet point – add the words <b>“and water quality”</b> after the word “source”.</p> <p>6<sup>th</sup> paragraph – delete existing text, and replace with:</p> <p><b>“Development proposals should incorporate Sustainable Drainage Systems (SuDS) where appropriate to manage greenfield surface water runoff rates and to reduce the potential for flooding. Sustainable Drainage Systems should be designed to deliver multi-purpose space to enhance biodiversity net gain and ecosystems within new developments. SuDS proposals should be designed appropriately to manage surface water and water quality.”</b></p> <p>Re-structure the Policy text, as amended by the above revisions, such that:</p> <p>The 1<sup>st</sup> and 2<sup>nd</sup> paragraphs are combined and preceded by the letter <b>A</b>.</p> <p>The 3<sup>rd</sup> paragraph is preceded by the letter <b>B</b>.</p> <p>The 5<sup>th</sup> paragraph is preceded by the letter <b>C</b>.</p> <p>The 6<sup>th</sup> paragraph is preceded by the letter <b>D</b>.</p> <p>The 7<sup>th</sup> paragraph is preceded by the letter <b>E</b>.</p>
PM7	Page 45	<u>Wellbeing, Leisure and Community Facilities</u>

		<p>Page 45 – right column – 2<sup>nd</sup> paragraph – add new 3<sup>rd</sup> sentence as follows:</p> <p><b>“Potential improvements to community facilities within the Parish are listed in Table 4 below with an indication of potential funding sources for each project including developer contributions negotiated through Section 106 agreements.”</b></p>
PM8	Page 9	<p><u>Introduction</u></p> <p>Insert new sub-section entitled “<b>Monitoring and Review</b>”, comprising two paragraphs, to follow the sub-section on Local Planning Context and to read as follows:</p> <p><b>“The Parish Council will monitor the effectiveness of the policies in this Plan to ensure that they contribute to achieving the Plan’s objectives. However, there is likely to be a necessity to formally review the Plan in due course, particularly following future reviews of the BLP and any relevant changes in national policy.</b></p> <p><b>It will be the role of the Parish Council, working with Brentwood Borough Council, to review the Neighbourhood Plan at the appropriate time to ensure that its policies take into account national and local policy, are responsive to climate and other environmental changes and are meeting the vision for the future of Ingatestone and Fryerning.”</b></p>
PM9	Various	<p><u>Amendments and Corrections</u></p> <p>Page 7 – Map 1 lacks a title.</p> <p>The content of this page will need to be generally updated to reflect the fact that Regulation 14 and Regulation 16 consultations took place in 2020 and 2021/22 respectively.</p> <p>Page 9 – <u>Local Planning Context</u></p> <p>The second paragraph of text should be updated with the reference to the superseded Brentwood Replacement Local Plan being deleted.</p>

		<p>The word “<b>emerging</b>” should be deleted from references to the IFNP.</p> <p>Page 9 (and at various other pages in the Plan e.g. pages 13, 24 and 34) – references to the Brentwood Local Development Plan or the Brentwood LDP should be changed to the adopted Brentwood Local Plan (BLP) for consistency across the Plan.</p> <p>Page 13 – Left column, 2<sup>nd</sup> paragraph – the reference to site R21 in the 3<sup>rd</sup> line of text should read “<b>R22</b>”.</p> <p>Page 13 – <u>Affordable Housing</u></p> <p>4<sup>th</sup> line – “meters” should read “<b>metres</b>”.</p> <p>Page 26 – there are two pages presently numbered 26.</p> <p>Pages 26-28 – Maps 3, 4 and 5 would benefit by having larger and more prominent titles, each with a reference to the Key (on page 28) for their interpretation.</p> <p>Page 28 – Asset no. 47B is mis-placed in the Key (on page 28).</p> <p>Page 34 – there are two pages presently numbered 34.</p> <p>Page 40 – there are two pages presently numbered 40.</p> <p>Page 47 – delete existing Nos. 14 and 16 and replace with “Essex County Council Parking Standards – Design and Good Practice (2009), adopted by Brentwood Borough Council as a Supplementary Planning Document (SPD) in 2011.” in each case.</p> <p>Page 50 – The most recent version of the NPPF is dated 2021, and references in the Plan to earlier versions should be deleted or amended accordingly.</p> <p>Pages 48 and 52 – <u>The Code for Sustainable Homes</u> is no longer in force and the reference should therefore be deleted.</p>
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# Ingatestone & Fryerning Neighbourhood Plan 2020-2033

Examination Ref: 01/DAS/IFNP

## Introduction

1. The below sets out Brentwood Borough Council and the Ingatestone & Fryerning Parish Council (Qualified Body) response to the Inspectors questions from the letter dated 20<sup>th</sup> April 2022.

## Question 1: Brentwood Local Plan 2016-2033 (page 12/13)

**I note that the Brentwood Local Plan 2016-2033 (BLP) was adopted by the Council on 23 March 2022, which will require a number of consequential amendments to references in the submission Plan (albeit noting the Basic Conditions Statement includes an assessment of the emerging BLP policies as at November 2021).**

**Can the Council please confirm that the content of the paragraphs on page 13 in the Plan, and accompanying Map 2 (on page 12), regarding Site R22 remain accurate and up to date regarding the proposed development of 57 dwellings. I also seek confirmation that the correct site allocation reference in the BLP for this site is R22, and that the reference to R21 in the third line of text in the second paragraph (left column) on page 13 is an error and should be R22.**

2. As noted by the Inspector the Brentwood Local Plan has been adopted, however a number of consequential amendments were made in order for the Local Plan to be found sound. Reading the content on page 13 of the IFNP, it is noted that the majority of the content reflects what is in the newly adopted Local Plan. However, amendments are needed to the first sentence under the heading of Affordable housing in the Plan on page 13. Therefore, the Council proposes the following changes as outlined below to ensure the text aligns with what it published in the Brentwood Local Plan:

**'BBC has proposed affordable housing requirement of 35% on proposed developments of 11 10 or more (net) units ~~or sites of 10 or less units which have a combined gross internal floorspace in excess of 1,000 square meters.~~**

3. The Council can confirm that Map 2 in the Plan is accurate and up to date with the Brentwood Local Plan policies map, as illustrated in the images below.

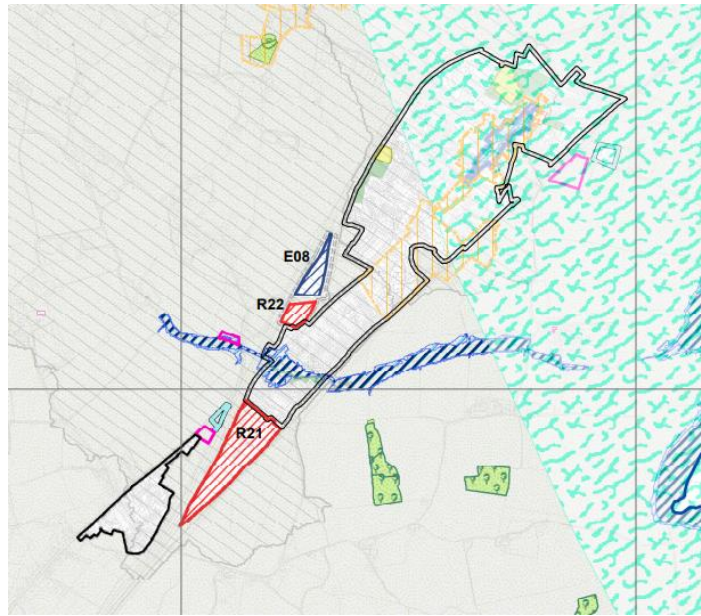


Image 1: Brentwood Local Plan Policies Map<sup>1</sup> extract of R21, R22, and E08



Image 2: Ingatestone & Fryerning Neighbourhood Plan Map extract from page 12

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<sup>1</sup> Brentwood Local Plan Policies Map can be view on-line via <https://www.brentwood.gov.uk/documents/20124/533660/Policies+Map+%2823.3MB%29.pdf/ef717ec2-7839-9e3b-ea8d-d983ed181e63?t=1648470136682>



4. The Council can confirm the site reference in the third line of the second paragraph of the Plan should read R22. Therefore, it is proposed that the text be amended to read:

'The LDP has allocated 57 dwellings in the parish on site ~~R21~~ R22 (Map 2) land adjacent to the A12 bypass on the south eastern edge of Ingatestone.'

## Question 2: Policy 3 (page 21)

**I note that Policy 3 refers to the conservation areas “*which are identified on the parish map*”.**

**I do not identify a map or plan within the submission Plan that shows the boundaries of the three designated Conservation Areas. In my view, such a map or plan will be necessary to enable future users of the Plan to correctly interpret Policy 3.**

**Can the Qualifying Body please provide me with a map(s) (at a suitable scale) clearly showing the boundaries of the three Conservation Areas, which I consider should be placed within the Heritage section of the Plan, and which I may consider as a potential modification to the Plan.**

5. There are three conservation areas within the Ingatestone & Fryerning Parish boundary – Ingatestone High Street, Ingatestone Station Lane, and Fryerning.
6. The maps for these conservation areas are published on both the Brentwood Borough Council, Conservation page and can be found via the links provided below:

Ingatestone High Street:

<https://document.brentwood.gov.uk/pdf/05092012164930u.pdf>

Ingatestone Station Lane:

<https://document.brentwood.gov.uk/pdf/05092012165220u.pdf>

Fryerning:

<https://document.brentwood.gov.uk/pdf/05112014101941u.pdf>

7. The Ingatestone & Fryerning Parish Council have included these maps within the Parish's Conversation Area Appraisal Management Plans published on the Parish Council's website via the links provided below:

Ingatestone High Street:

<https://document.brentwood.gov.uk/pdf/06022009144704u.pdf>

Ingatestone Station Lane:

<https://document.brentwood.gov.uk/pdf/06022009145001u.pdf>

Fryerning:

<https://document.brentwood.gov.uk/pdf/05092012170002u.pdf>

8. Copies of the three conservation areas maps have been provided in Appendix 1 at the end of this document.
9. It is also proposed that these maps be included in an appendix at the end of the Plan. If the inspector is agreeable to this, then it is proposed that the following amendments to the Plan be made to correctly direct the user to the conservation maps:

**Context heading:**

**Paragraph 3**

'The High Street Conservation Area (**Appendix 2**) contains 35 designated heritage assets and a number of protected trees within the historic core village.'

**Paragraph 4**

'The Station Lane Conservation Area (**Appendix 3**) contains five designated heritage assets and is predominately residential containing substantial detached houses in large garden plots set back from the road edge.'

**Paragraph 6**

'The third conservation area in the parish is located in Fryerning (Figure 9)(**Appendix 4**)

**Policy 3:**

'a) Development within conservation areas which are identified on the Parish **Conservation** Maps found in **appendices 2-4**, and should demonstrate how the

proposals will protect and where possible enhance, the character, appearance, setting and historical interest of the conservation area.'

### Question 3: Policy 4 (page 29)

**I note that clause (a) of the Policy sets out a range of potential Use Classes that would be supported at Employment site allocation ref. E08 (Land adjacent to the A12 and slip road, Ingatestone).**

**The uses listed in clause (a) do not correspond in full to the uses listed in the preceding paragraph of supporting text, specifically regarding the additional various Class A and Class D uses that are listed in that paragraph.**

**In my assessment, the Policy and its supporting justification could lead potentially to some misunderstandings for users of the Plan regarding the extent of proposals which would be supported at this site. I consider that the Policy and its supporting text should better reflect the adopted BLP in order to meet the Basic Conditions.**

**I therefore invite the Qualifying Body to consider this matter, and if appropriate to provide draft text for suitable amendments to clause (a) of Policy 4 and its supporting justification, to ensure that there is clarity on the nature of the potential uses that will be supported at Site E08, and which I may consider as a potential modification to the Plan.**

10. The supporting text and policy of the Plan has been reviewed alongside policy E08 in the Brentwood Local Plan. In order to ensure consistency and reduce possible confusion the Qualifying Body has considered amendments to both the supporting text and policy 4.

11. The Qualified Body proposes that reference to use class A, C2 and D be removed from the supporting text as outlined below:

#### **Context – Employment allocations in the Brentwood Borough Local Plan**

##### **Paragraph 2:**

'The parish council supports this employment allocation and would also be supportive of the following additional uses on the site alongside employment related uses where appropriate:

- ~~A residential care home (C2 use)~~
- ~~Early year childcare facilities (D1 use)~~

- Financial services (E(c)(i) use) and
- Professional services (A2 use E(c)(ii) use)
- Gymnasium (~~D2~~ E(d) use)
- Managed Shared Office (B1 use)
- Retail (E(a) use)
- Medical or health services (E(e) use)
- Offices with administrative functions (E(g)(i) use)
- Storage or distribution (B8 use)
- ~~Banking facilities (A2 use)~~

12. In addition, the following amendments are proposed for policy 4:

‘a) Land adjacent to the A12 and slip road, Ingatestone, identified in the Policies Map as Site E08, is allocated for 2.06ha of employment land. The following uses are permitted on this site:

- E(g), B2, B8 and any associated employment generating sui generis uses as principle use on sites
- E(~~a-f, b, c~~), ~~C2~~, ~~E(e-f)~~ and ~~E(d)~~ ancillary uses, where it is demonstrated that the location of these uses will not inhibit the operation of the principle uses on the site.’

#### Question 4: Policy 5 (page 36)

**The supporting justification for this Policy states on page 34 that “*The area of Ingatestone village associated with concerns for the safety of pedestrians, proposed speed reductions and proposed School Clear Zones is identified within Policy 5 as a ‘Safe Route’*”. Within the text of the draft Policy, there is no specific reference to ‘Safe Routes’, although there is a more generic reference to safe pedestrian and cycles routes in the 7<sup>th</sup> bullet point of the third paragraph of text.**

**I therefore invite the Qualifying Body to consider whether the Policy should identify the allocated ‘Safe Route’ for Ingatestone village more specifically, and if appropriate to provide some suitable text for an additional clause or bullet point that I may consider as a potential modification to the Plan.**

13. As part of the evidence base stage, the Qualifying Body undertook a resident’s survey to ascertain what some of the key issues and priorities were for the local community. As seen in table 1 of the Plan, safety, particularly when considering

active modes of travel are a key concern for the residents of Ingatestone and Fryerning Parish.

14. The Qualifying body has therefore, indicated within the Plan some of their ambitions to improve the safety for pedestrians, and cyclists, which has been referred to as 'Safety Routes'.
15. The 'Safety Routes' ambitions for the Parish Council include speed limit reductions to 20 mph, School Clear Zones to create safer walking and cycling routes for school children to get to and from school, new pavements or designated areas of the road for pedestrians, traffic calming measures, and improved road markings.
16. However, the 'Safety Routes' are currently an identified priority for the local community, subject to further detail work. Ongoing discussions are held regarding how pedestrian and cyclist routes could be made safer through the Brentwood Highways Panel.
17. 'Safety Routes' have not been formally allocated. The Parish Council is working alongside Essex County Council (the highways authority) to make these ambitions a reality, however this is still work in progress. Therefore, it is proposed that the last paragraph under the heading Safety (page 34) be amended to read as follows:  
  

**'The IFNP questionnaire identified pedestrian safety as a concern. area of Ingatestone village associated with concerns for the safety of pedestrians proposed speed reduction and proposed School Clear Zones is identified within Policy 5 as a 'Safe Route'. Within the allocated Safe Route, As identified in Table 1, there are some areas within the parish boundary where safety concerns have been identified. T**the parish council will seek opportunities to improve safety for pedestrians and cyclists where possible, including the provision of:...
18. Provided the Inspector is agreeable to the above proposed amendment, Table 2 (page 35) is also proposed to amend the last item under Project to read **Ingatestone pedestrian and cyclist safety improvements** and remove reference to 'Safe Routes' to avoid confusion.
19. The Parish Council currently has three working groups which each look at ways to improve the access and safety of active travel which all feed into the Parish Full Council meetings – the climate emergency working group, the health and

wellbeing working group, and the economic development working group. Officers from both Brentwood Borough Council and Essex County Council are involved with these working groups along with other community stakeholders including local residents. It is through these working groups and the Brentwood Highways Panel, the Parish Council intends to progress their aspirations to create safer pedestrian and cycle routes.

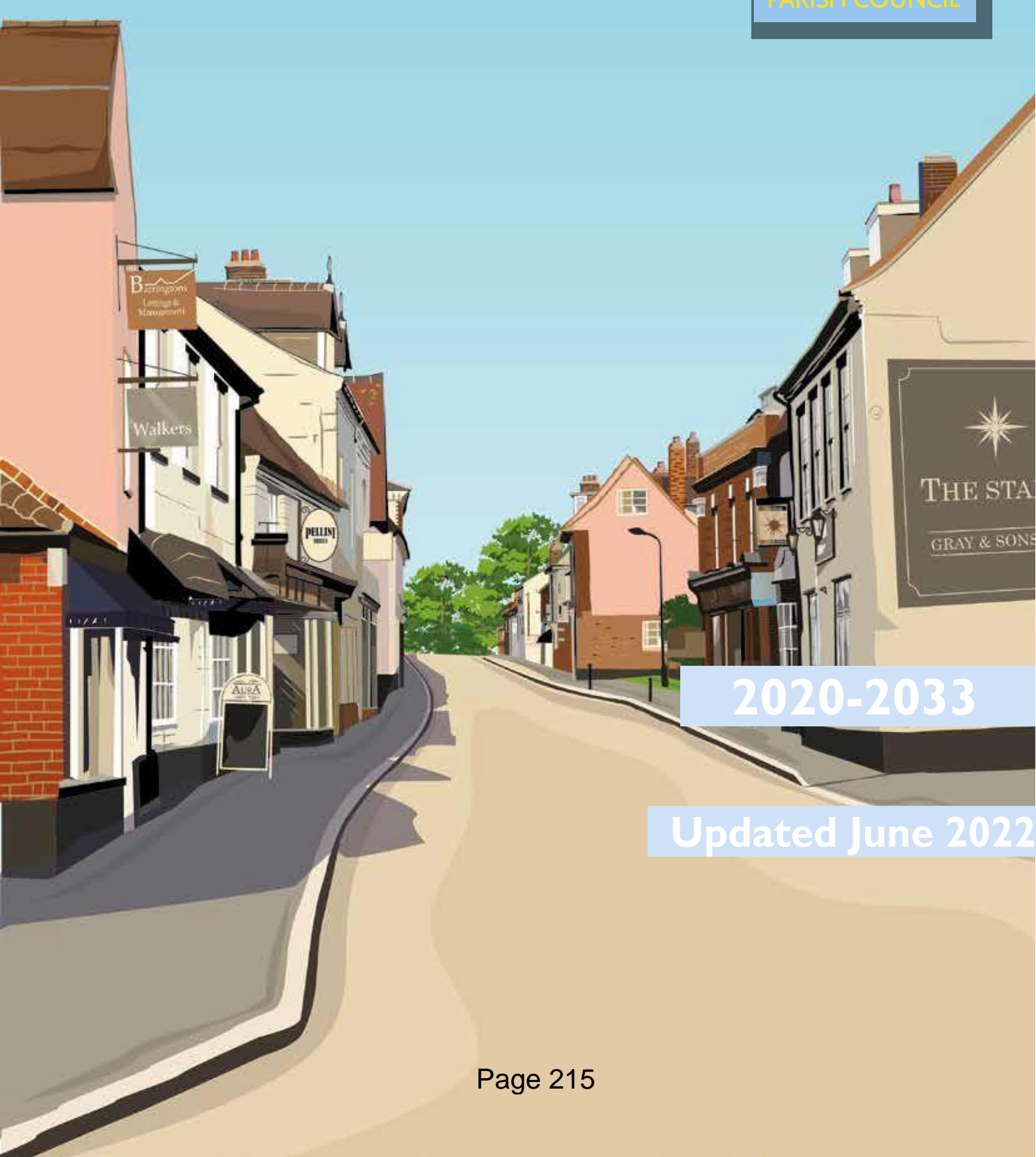
20. Assuming the above amendments identified within paragraphs 16 and 17 are agreeable to the Inspector, then it is the Qualified Body's and Brentwood Borough Council's view that no amendments would be needed to policy 5.

# Neighbourhood Plan

Appendix C



INGATESTONE  
& FRYERNING  
PARISH COUNCIL



2020-2033

Updated June 2022



## FRONT COVER



Cover illustration by local artist  
Geraldine Burles.

Geraldine specialises in vintage travel  
inspired posters, historic villages and  
coastal scenes.

[www.geraldineburlesillustration.co.uk](http://www.geraldineburlesillustration.co.uk)

## CREDITS

### Ingatestone and Fryerning Neighbourhood Plan 2020-2033

Ingatestone and Fryerning Parish Council

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The production of the Plan was overseen by the Neighbourhood Plan  
Advisory Committee (NPAC) chaired by Cllr. Jane Winter.

This document is also available at  
[www.ingatestone-fryerningpc.gov.uk](http://www.ingatestone-fryerningpc.gov.uk).

Hard copies can be viewed by contacting Ingatestone and  
Fryerning Parish Council or Brentwood Borough Council.

With thanks to the communities of Ingatestone and Fryerning, the  
Rural Communities Council of Essex, Tim Parton of DAC Planning  
([www.dacplanning.com](http://www.dacplanning.com)) who provided planning policy advice and  
drafting support, Sue Lees Consultancy ([www.suelees.co.uk](http://www.suelees.co.uk)) and  
Brentwood Borough Council.

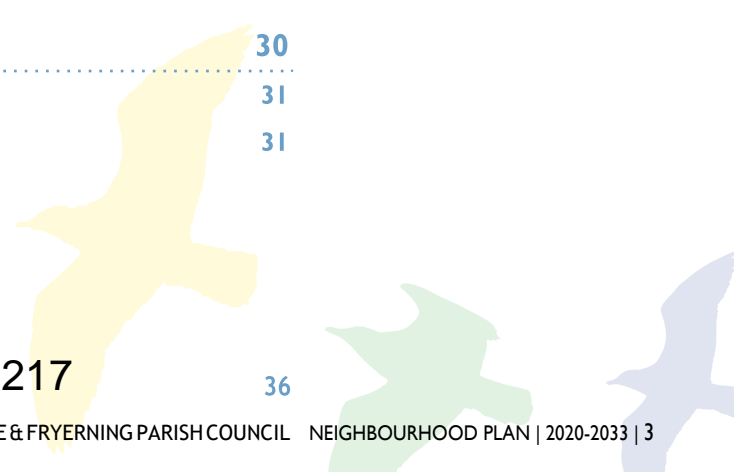
The Neighbourhood Plan Advisory Committee comprised Cllr.  
Jane Winter (chair), Aileen Donnelly (resident), Cllr. Toby Blunsten,  
Cllr. Martyn Hart, Elaine Jeater (resident), Cllr. Paul  
Jeater (Chair of IFPC), Marilyn Marston (resident), Paul McCann  
(resident), Cllr. Darryl Sankey.

With thanks to: Cllr. Dawn Jelley for her advice and professional  
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meetings and assisted our communications with the residents  
via our social media channels and Dr Roger Winter for photographs.



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## VISION STATEMENT

The Ingatestone and Fryerning Neighbourhood Plan (IFNP) covers the period 2020-2033. The Plan presents a vision for the future of the parish and provides planning policies which will help to guide development and community projects, protect valued assets and deliver our identified vision for the future.

Through consultation with the local community and a comprehensive assessment of the parish, the Ingatestone and Fryerning Neighbourhood Plan Advisory Committee (NPAC) has identified the following vision for the future of the parish.

Ingatestone and Fryerning are vibrant and distinctive rural villages with easy access to fields and the countryside. We strive to respect and reflect the views of our communities, to evolve and expand whilst retaining our unique and distinctive character and to provide a good quality of life for current and future generations of residents.

Through the Neighbourhood Plan, the parish council will support this vision by:

- recognising and protecting the character and history of the neighbourhood area, its conservation areas (Fryerning, Ingatestone High Street, Station Lane and Tor Bryan), listed buildings and sites.

- supporting measured, proportionate, timely and sustainable development to meet local requirements, particularly those of our young people and older residents.
- influencing key 'age friendly' issues, for example, community safety, housing, planning, street lighting, green spaces, playing fields and parks, community centres, war memorials, seats, shelters and public toilets.
- engaging residents, particularly older people in the creation of social networks, enabling action for safer, kinder, cleaner, inclusive and connected communities (both online and offline).
- promoting a flourishing local economy with a range of successful independent businesses.
- giving consideration to effective transport links, the staffed train station, the bus service and access routes for movement around the village of cyclists and pedestrians.
- endorsing policies that have a positive effect on the environment, including those that remove or minimise flood risk, mitigate climate change, reduce our carbon footprint and minimise the impact of traffic to protect the quality of air within the parish.

Ingatestone and Fryerning Parish Council at work





# INTRODUCTION

## WHAT IS NEIGHBOURHOOD PLANNING?

The 2011 Localism Act introduced new powers for local communities to produce neighbourhood plans, which can be used to guide and shape future development in an area. Once 'made' (adopted), a neighbourhood plan forms part of the statutory Development Plan for the area and it is used in the determination of planning applications alongside the adopted Brentwood Local Plan (BLP) and other material planning considerations, including the National Planning Policy Framework (NPPF)<sup>1</sup>.

Neighbourhood plans must be subject to public consultation, examination and local referendum prior to adoption and policies contained within a neighbourhood plan should be supported by evidence based documents and Strategic Environment Assessment/Habitats Regulation Assessment as necessary. Neighbourhood plans must accord with the overall aims and objectives of the NPPF, particularly in relation to supporting and promoting sustainable development.

Neighbourhood plans give communities direct power to guide and shape future development. Where a Neighbourhood Plan is aligned with the strategic needs and priorities of the wider local area, neighbourhood planning can provide a powerful set of tools for local people to ensure that future development meets the needs and requirements of the local community.

The Planning Practice Guidance<sup>2</sup> states that a neighbourhood plan must meet the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990<sup>3</sup>. The submission of the final version of the Ingatestone and Fryerning Neighbourhood Plan to Brentwood Borough Council (BBC) will include a statement setting out how the plan meets the requirements of the basic conditions set out below:

- The neighbourhood plan has regard to national policies and advice contained in guidance issued by the Secretary of State.
- The making of the neighbourhood plan contributes to the achievement of sustainable development.
- The making of the neighbourhood plan is in general conformity with the strategic policies contained in the Local Plan.
- Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with proposals within the neighbourhood plan.

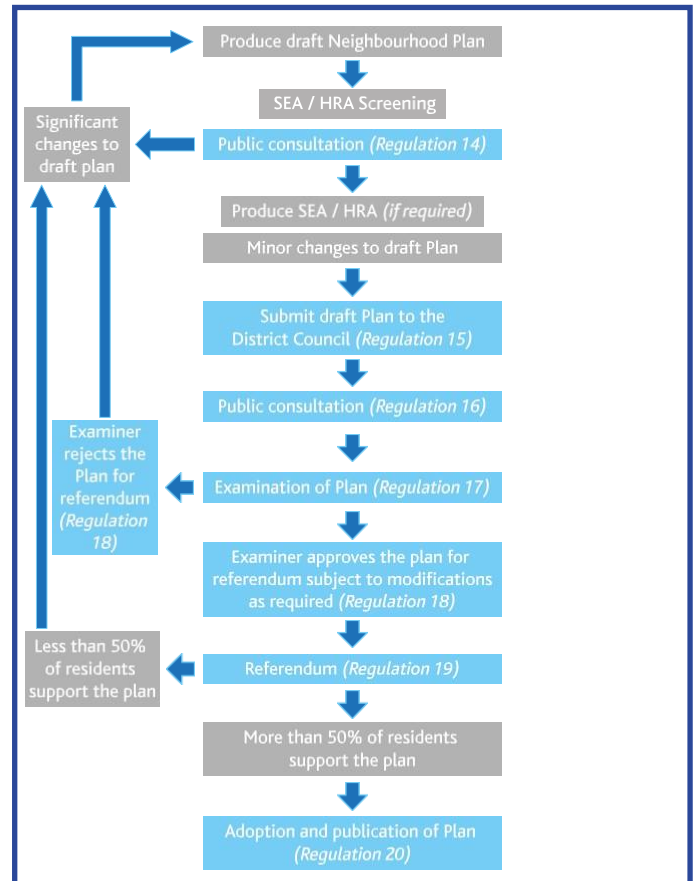


Figure 1: Guide to producing a neighbourhood plan

The Neighbourhood Planning (General) Regulations 2012 (as amended) set out the statutory stages which must be completed in the production of a neighbourhood plan. Figure 1 presents this process and identifies which stage we are currently at in the production of the IFNP.

## WHY DOES INGATESTONE AND FRYERNING PARISH NEED A NEIGHBOURHOOD PLAN?

Neighbourhood planning gives communities direct power to develop a shared vision and shape the development and growth of their local area. Community groups can produce plans that have real statutory weight in the planning system to shape future growth. The production of a neighbourhood plan provides the community with the opportunity to establish objectives and requirements to guide and manage future development proposals in the parish in order to ensure that local needs are met, but also to ensure that the valued characteristics of the parish can be maintained and protected for future generation.

### Footnotes

<sup>1</sup> National Planning Policy Framework, HM Government, February 2019.

<sup>2</sup> The Planning Practice Guidance (PPG) is an online portal which provides guidance on implementing aims and objectives of the NPPF. The PPG provides specific guidance on a range of planning related topics.

<sup>3</sup> See paragraph 65 of the PPG.

## PROGRESSION OF THE INGATESTONE AND FRYERNING NEIGHBOURHOOD PLAN

The concept of producing a neighbourhood plan for Ingatestone and Fryerning parish was first presented to the community at the Ingatestone and Fryerning Horticultural Show on Saturday 15 July 2017. This was followed by further information on neighbourhood planning being published in the August 2017 Ingatestone and Fryerning Parish Council newsletter, which is delivered to every household in the parish.

In October 2017, BBC designated Ingatestone and Fryerning Parish as a Neighbourhood Area for the purposes of producing a neighbourhood plan, and the Neighbourhood Plan Advisory Committee (NPAC) was established to support the parish council in developing the IFNP.

Residents and stakeholders were invited to participate in the committee using social media and the Ingatestone and Fryerning Parish Council website. The terms of reference for the committee were formulated and agreed by the parish council in November 2017.

Since 2017, the NPAC has undertaken extensive research and analysis of current and potential future issues in the parish and undertaken a range of community events in order to inform the production of the draft IFNP.

During summer 2018 a questionnaire was posted to all households and businesses in the Parish. The analysis of responses to the questionnaires has been an important component in formulating the vision, aims, objectives and policies contained within the draft IFNP.

## PURPOSE OF THE REGULATIONS 14 AND 16 CONSULTATIONS ON THE INGATESTONE AND FRYERNING NEIGHBOURHOOD PLAN

As outlined in Figure 1, the Neighbourhood Planning (General) Regulations 2012 (as amended) require the neighbourhood plan to be subject to two public consultations before the plan can be submitted for examination.

Both the Regulation 14 (September 2020) and Regulation 16 (December 2021) consultation were undertaken prior to the neighbourhood plan being submitted to an independent inspector.

### Footnotes

<sup>1</sup> 2011 Census, Office for National Statistics, 2011.

## OUTCOME OF THE NEIGHBOURHOOD PLAN EXAMINATION

The neighbourhood plan commenced the examination process on 7<sup>th</sup> April 2022 and concluded on 17<sup>th</sup> June 2022. The Inspector concluded that the neighbourhood plan could proceed to Regulation 19: Referendum provided the required modifications were made. For details on the Inspectors Report and required modifications can be viewed at [www.brentwood.gov.uk/-/ingatestone-and-fryerning-np](http://www.brentwood.gov.uk/-/ingatestone-and-fryerning-np)

## ABOUT INGATESTONE AND FRYERNING PARISH

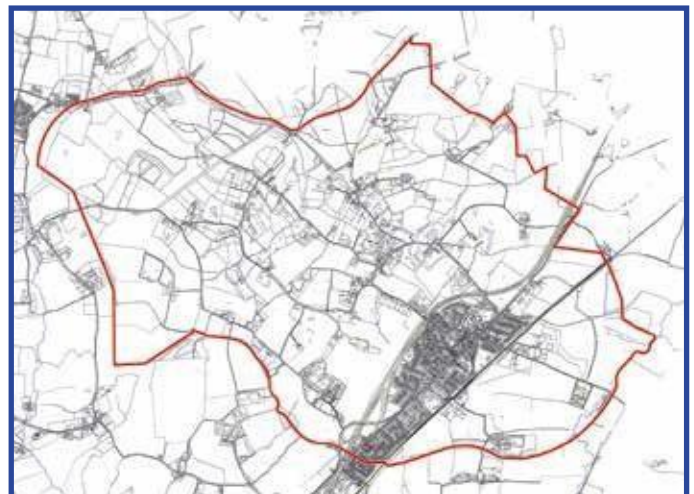
### Location and context

The parish of Ingatestone and Fryerning is located in the Borough of Brentwood, Essex. The designated Neighbourhood Area for the purposes of producing the Neighbourhood Plan is consistent with the parish boundary presented in Map 1.

Ingatestone and Fryerning parish includes two villages surrounded by Metropolitan Green Belt and open farmland. The villages have a combined population of 4,785 people<sup>4</sup>, including 2,095 households.

The main settlement of Ingatestone is excluded from the green belt and lies within an area bounded by the railway to the east, the A12 trunk road to the west, New Road to the north and the Hey Brook to the south. Fryerning and the surrounding small settlements of Mill Green and Beggar Hill are all situated within the Green Belt. The parish is bounded by the River Wid to the south east and much of the west consists of woodland.

Map 1: Map of Parish boundary. Copyright Phill Poston.





Villages in the parish have a rural atmosphere, character and appearance. Short walks from the centre of Ingatestone and Fryerning lead into open fields with a good network of public footpaths and bridleways in the green belt. There are small local businesses and a good range of shops and services within the local villages.

## History

Both Ingatestone and Fryerning have their origins in the Saxon period when Ingatestone was called 'Ingattestone' and Fryerning was 'Friarsing'. 'Ing', a common Saxon word, could mean pasture, possession of, or settlement. Therefore, 'Ing Atte Stone' could have meant 'settlement at the stones' and 'Friars Ing' 'Friars settlement'. The stones relate to sandstone blocks known as 'sarsens stones', two of which exist on the junction of Fryerning Lane and the High Street.

From about 950AD, Ingatestone was in the possession of Barking Abbey, but with the dissolution of the monasteries in 1539 it was sold by the crown to Doctor William Petre who had Ingatestone Hall built in the 1540's.

After the Norman Conquest, Fryerning was given to the Norman baron Robert Gernon and passed to the Knights Hospitallers of St. John until the order was dissolved by Henry VIII in 1540. The estate was eventually passed to Nicholas and Dorothy Wadham in 1607, who founded Wadham College in Oxford. On their deaths the estate passed into college ownership and much of it remains in their hands to this day.

Ingatestone developed alongside the route of the old Roman Road built to connect London with Roman outposts such as Colchester. Very early maps show ribbon development along the road edges which include buildings such as The Crown pub.

Ingatestone was a day's ride on horseback from London, and therefore became an important location for stagecoaches and Royal Mail coach horses to be changed and travellers to rest for the night. As a result there were large numbers of inns, in addition to a blacksmiths, wheelwrights and harness makers. Before the advent of the railway around 50 coaches a day would pass through the village. Only The Bell pub remains on the Roman Road, where as many as 20 inns would once have existed. The railway arrived in 1843 and the stagecoach trade ceased. Ingatestone Station was built in 1846 and is now located in Station Lane between Ingatestone Hall and the village centre.

Market Place, in the centre of Ingatestone has a mural depicting some of the villages' history. Ingatestone and Fryerning formed one Civil Parish in 1889. The Roman Road passing through the village was the A12 trunk road. However, increases in traffic levels resulting in congestion in the narrow High Street led to the building of the bypass in 1958/9.

## Conservation areas

Ingatestone's High Street Conservation Area was established in November 1969 and contains a large number of grade II listed buildings and a grade I listed parish church.

The Station Lane Conservation Area was established in September 1981 and includes many Arts and Crafts style properties designed by George Sherrin, the grade II listed railway station, the Catholic church and Tor Bryan estate. Outside this area is Ingatestone Hall, which includes a listed granary and gatehouse.

The Fryerning Conservation Area was established in March 1991 and contains the listed St. Mary the Virgin Church, Mill Green Windmill, Fryerning Hall and medieval barns and many other listed properties. Mill Green also has evidence of medieval brick kilns where ancient pottery has been found.

## Services and facilities

Ingatestone has several churches of different denominations, two church halls, an infant and junior school and the Anglo European School. There are preschools, playgroups and a nursery. Christy Hall provides space for community groups and events.

A good range of shops, public houses, wine bars, restaurants and cafés exist along the High Street, with free two-hour parking bays in the Market Place and Bell Mead. Shops include two supermarkets, a florists, a delicatessen, clothes shops, stationers, jewellers, hardware store, off-licence, galleries, hairdressers, newsagents and more. Other services include a post office, estate agents, optician, veterinary surgery, doctor's surgery, dentist and an undertaker.

Fryerning village includes two public houses, a church and the Fryerning Parish Rooms.

## Parks and leisure facilities

Recreation facilities exist on Fairfield, leased from Lord Petre by the parish council, where cricket matches are played in the summer. There is a cricket pavilion, two children's play areas and a historic pond. Mill Green Common, owned by Lord Petre, is available for use, as is Seymour Field, leased from Brentwood Borough Council.

Seymour Field and its newly renovated pavilion (Figure 21) are managed by the parish council. There are a number of playing fields used by local football teams and it hosts the annual horticultural show. The Community Club (Figure 23) on the High Street has a hall and stage for shows and events, a members' bar, tennis courts (Figure 26) and a bowling green (Figure 24) to the rear.

Fishing lakes and two allotment sites (Figure 25) exist within the parish and there is a common at Mill Green in Fryerning. Christy Hall hosts guides, scout groups and clubs.

## Local planning context

New development in the parish is currently guided by the policies contained within the adopted Brentwood Replacement Local Plan, together with other material considerations (including National Planning Policy). The Local Plan sets a framework for future growth in the area, identifying the level of need and locations for new housing, employment and retail development. The Local Plan also includes specific policies which guide the design, scale, impact and location of new development and infrastructure, as well as policies related to protecting and enhancing heritage assets, the environment, town centres and rural areas.

The new Brentwood Local Plan was recently adopted in March 2022, replacing the Brentwood Replacement Plan (2008). This document forms the Development Plan for the Borough. BBC are updating the BLP through the Brentwood Local Plan (BLP) form the new Development Plan for the area. Consultation on the BLP was undertaken in 2016 and 2018 and consultation on the pre-submission BLP was undertaken in February 2019. Further consultation on 'focused changes' to the pre-submission BLP was undertaken in November 2019 and was submitted to the Secretary of State for examination in 2020. The Inspectors reviewing the BLP concluded the plan could be adopted provided main modifications were undertaken. The BLP was formally adopted by the council in March 2022.

Essex County Council (ECC) is the Waste Planning Authority (WPA) for the Plan area and is responsible for preparing planning policies and assessing applications for waste management development. The Essex and Southend-on-Sea Waste Local Plan (WLP) was adopted in July 2017 forming part of the statutory Development Plan and should be read alongside the Brentwood Local Plan and the IFNP. The WLP covers the period from 2017 to 2032. It sets out where and how waste management developments can occur and contains the policies against which waste management planning applications are assessed.

ECC is the Minerals Planning Authority for the Plan area and is responsible for preparing planning policies and assessing applications for mineral development. The Essex Minerals Local Plan 2014 (EMLP) forms part of the statutory Development Plan and should be read alongside the Brentwood Local Plan and the IFNP.





# HOUSING





# HOUSING

## VISION AND OBJECTIVES

The following housing related objectives form part of the vision statement for the Ingatestone and Fryerning Neighbourhood Plan (IFNP):

- Supporting measured, proportionate, timely and sustainable development to meet local requirements, particularly those of our young people and older residents.
- Influence key 'age friendly' issues, including housing.

The following housing related objectives have been identified by the Neighbourhood Plan Advisory Committee (NPAC) to guide the production of the IFNP housing policies.

- To promote an integrated approach to achieving sustainable and quality residential environments.
- To promote the comprehensive planning and development of residential areas and ensure that adequate information accompanies planning applications which will enable the delivery of an improved design quality.
- To ensure that adequate provision is made for infrastructure and appropriate local neighbourhood facilities as an integral part of residential development.
- To promote quality residential development that:
  - Creates places for people which are attractive, locally distinctive and appropriate to their surroundings, safe, convenient, adaptable and easy to maintain.
  - Respects and enhances features of value and local character and promotes biodiversity.
  - Reduces reliance on the private car, supports movement by pedestrians and cyclists, provides adequate and convenient access to public transport and connects well with the wider locality.

## CONTEXT

### Housing statistics

The Rural Community Profile for Ingatestone and Fryerning (RCCE, 2013) highlighted the following key statistics<sup>5</sup> associated with housing in the parish:

- The parish has a population of 4,785 and 2,095 households.
- The majority of households in the parish consist of married couples.
- The parish has a lower than national average proportion of one person households.

### Footnotes

<sup>5</sup> Unless specified otherwise, all statistics are from 2011 census data.

<sup>6</sup> A summary of the results of the IFNP Residents' Questionnaire is available in the Neighbourhood Plan evidence base on the parish council website [www.ingatestone-fryerningpc.gov.uk](http://www.ingatestone-fryerningpc.gov.uk).

- The parish has a higher proportion of pensioner households than the national average.
- The majority of dwellings in the parish are detached owner-occupied houses.
- There is a lower proportion of terraced houses and flats in the parish than the national average.
- There is a lower proportion of social and private rented properties in the parish than the national average.
- Median house prices in the parish are higher than national averages for all types of dwellings. Housing in Ingatestone and Fryerning is therefore less affordable than in other areas of the country.

### Questionnaire results on housing

Comments raised by local people during Neighbourhood Plan consultation events and through the IFNP Residents' Questionnaire<sup>6</sup>, together with consultations organised by Brentwood Borough Council (BBC) for the production of the adopted Brentwood Local Plan (BLP) include:

- Acceptance of the need to accommodate sustainable housing development in accordance with the LDP and ensure that the development of sites is appropriate for the village.
- Ensure that the design, style and density of new housing are in keeping with the character of the parish and the rural environment and that it is sustainable, free from flood risk and includes adequate parking provision and appropriate landscaping.
- Ensure that the mix of housing types and supply of social and affordable housing meets the needs of the parish.
- Increase the provision of bungalows and smaller homes for elderly people in particular.

In relation to the future housing requirements of the area, the IFNP Residents' Questionnaire identified that the greatest needs in the area are for three or four bedroom market housing and bungalows. Housing needs identified in the parish through the questionnaire were consistent with the types of houses existing residents would like to see built in the area, where the preference was for two to four bedroom properties. The questionnaire also identified support for more affordable homes, starter homes and housing for older people within the parish.

In relation to housing design within new development, questionnaire responses identified a preference towards designs which respect the scale and style of existing buildings and the use of traditional local building materials.



Figure 2: The Fulongs



Figure 3: Huskards, Fryerning

In relation to location of new housing in the parish, the questionnaire responses identified a preference towards using brownfield land and seeking to protect greenfield land.

### Existing housing in the area

Existing housing in Ingatestone consists of a wide range of styles and designs, often in small estates from various time periods which relate to past expansions of the village. The majority of housing within the village is low density, detached and semi-detached two storey housing, predominantly with front gardens and off-street parking (Figure 2). Older Victorian style properties in the central areas of the village are larger in scale and are located on significantly larger plots with extensive gardens. In the south of the village adjacent to the parish boundary are a higher proportion of smaller bungalows, however along Roman Road leading out of the parish towards Mountnessing housing remains characterised by low density, detached and semi-detached two storey housing with front gardens and off-street parking.

In comparison to Ingatestone, housing areas in Fryerning (Figure 3) are more rural in character and at significantly lower densities. Dwellings are predominantly much larger in scale and located on plots which predominantly include a gated driveway, separate garage and densely vegetated boundaries with extensive gardens. Other rural areas of the parish are characterised by hamlets and dispersed predominantly two storey dwellings on large plots.

### Housing requirements in the area

Local housing needs change on a consistent basis and therefore require regular review in order for the parish council to have a good understanding of current housing needs in the area. The parish council will work with BBC to maintain a local housing need register which can inform the allocation of housing in the area and the type and mix of housing being delivered. The parish council will also work with BBC to consider how affordable housing can be prioritised for people with a local connection to the parish and how affordable housing can be retained in the future for people with a local connection.

Paragraph 65 and 66 of the National Planning Policy Framework (NPPF) state that strategic policy making authorities should set

Map 2: Site allocation R22, land adjacent to the A12 bypass, Ingatestone. Copyright Brentwood Borough Council.

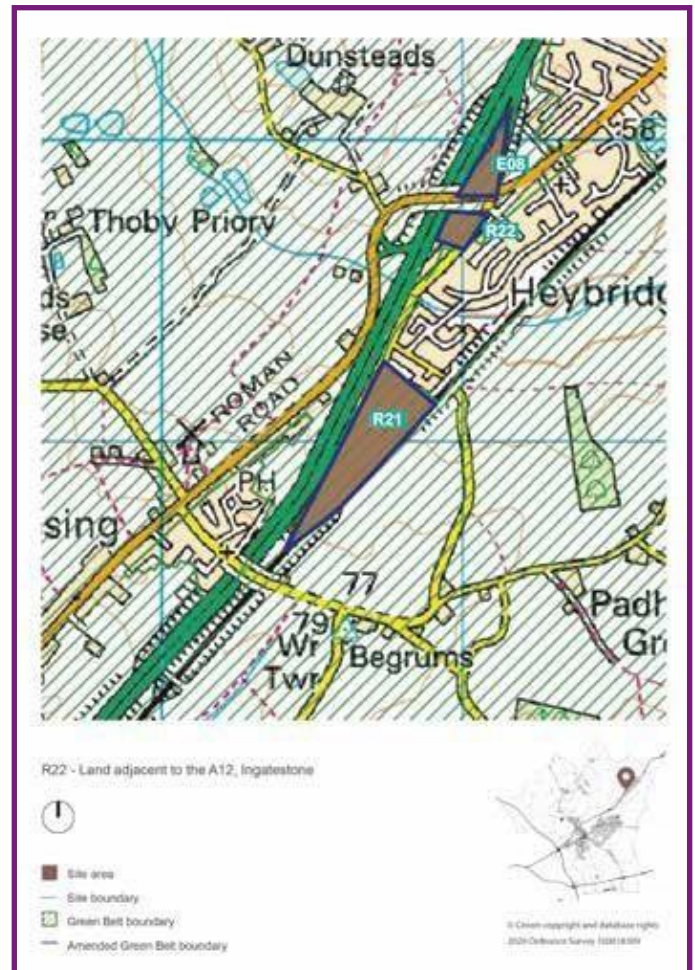




Figure 4: Tor Bryan I

out a housing requirement figure for designated neighbourhood areas and where this is not possible an indicative figure should be provided. In accordance with these requirements, BBC has concluded that the IFNP should seek to allocate a minimum of 57 new homes up to 2033.

### Housing allocation in the Local Development Plan (LDP)

The Brentwood LDP seeks to deliver an average of 456 new dwellings per annum in the Borough up to 2033. The LDP has allocated 57 dwellings in the parish on site R22 (Map 2), land adjacent to the A12 bypass on the south eastern edge of Ingatestone. The LDP also requires the provision of 35% affordable housing, public open space and a landscape buffer adjacent to the A12. The parish council supports this housing allocation within the LDP and therefore includes this site as an allocation within IFNP Policy I.

The BLP has also allocated 161 dwellings on land south of Ingatestone, east of the A12, identified as Site R21 in the Local Plan. While this site is located outside of the Neighbourhood Area within Mountnessing, it will still have a significant impact on local infrastructure within the Ingatestone and Fryerning parish. This Neighbourhood Plan will therefore consider and seek to address the impacts arising from the proposed development of Site R21 in Ingatestone and Fryerning parish.

### Ingatestone and Fryerning Neighbourhood Plan housing allocation

IFNP Housing Policy I allocates Site R22, land off Roman Road, Ingatestone, for the development of 57 dwellings. The site is located at the southern periphery of the village where it effectively forms a gateway site when approached from both Brentwood and Billericay directions.

The site falls within the Mountnessing Critical Drainage Area (CDA). Any development within this area should be directed away from areas of existing flooding and where possible should

try to have a positive impact on existing areas of flood risk downstream of the development. Early engagement with the Lead Local Flood Authority (LLFA) and consideration of the most up to date Surface Water Management Plan (SWMP) and associated SWMP Action Plan, is critical to ensure that existing and potential flood risk is properly managed.

Along Roman Road the immediate neighbouring properties to the east date from the 1930's and consist of single two storey detached and semi-detached properties of a low density suburban character. All possess front gardens and have off street parking. South of the site Ingatestone House, a substantial extended Georgian house, exists. Further south are some large detached houses within their own grounds and constructed in the 1970's whereas to the east (opposite) side of Roman Road the Hare Bridge Estate was completed some 13 years ago.

Ingatestone generally contains a mix of all periods, styles and design ranging from Tudor and Georgian to Victorian as well as early and mid 20th century estates and infill sites, including the contemporary private Tor Bryan Estate (Figure 4). This latter is now recognised as being: "a striking and innovative example of a post-war housing development with bold modern architecture, varied detailing and a distinctive palette of materials"<sup>7</sup>. The estate is now included in a conservation area.

Taking into account the site's key location at the entrance to the village, an exceptionally high standard of design is expected, including a scheme that integrates well into its surroundings, creates a positive sense of place and identity and relates well to the existing local area in relation to layout, patterns of form, scale, appearance and materials.

### Affordable housing

BBC has proposed an affordable housing requirement of 35% on proposed developments of 10 or more (net) unit. Site R22 is therefore required to provide 35% affordable housing, which would provide 20 new affordable dwellings within the parish. Ingatestone and Fryerning have high average house prices and there is a shortage of affordable housing in the area. Whilst it is acknowledged that the requirement of 35% affordable housing is based on the viability testing of strategic sites undertaken as part of the production of the BLP to meet local affordable housing needs, the NPAC would support a higher rate of affordable housing where it can be demonstrated that the higher rate would not render the site financially unviable.

New developments within the parish should seek to create inclusive, integrated and well-connected communities. The integration of communities can often be more challenging within new developments where the affordable housing is segregated into one area of the site. The parish council therefore

### Footnotes

<sup>7</sup> Station Lane Ingatestone Conservation Area Appraisal and Management Plan, ECC, 2008.

expects affordable housing to be integrated throughout new developments. To ensure a high quality of design throughout the development, the design of affordable units should be indistinguishable from market housing on the site in relation to building design and quality.

BBC manages a sheltered housing scheme within Ingatestone which in total comprises 67 dwellings, including a main building with 10 bedsits and four one bedroom flats, a mixture of bungalows and one bedroom flats on Stock Lane and Wadham Close and Steen Close bungalows off of Fryerning Lane. Ingleton House is part of the sheltered housing scheme located on Stock Lane and has been identified by the NPAC as containing units which are no longer fit for purpose. The existing layout of buildings on the site does not maximise its development potential and it is considered that a reconfiguration of the site could accommodate more housing on the site.

### Housing design

The parish council expects new housing development within the parish to be high-quality and affordable, seeking to ensure

that everyone has access to a decent home in a human-scale environment that they can afford. The parish council expects new development to enhance local distinctiveness by using architecture styles and design which are characteristic of the parish. Further details are contained in the Housing Design section.

### Housing type

The parish has an ageing population, with many residents seeking opportunities to downsize from family sized three or four bedroom properties. The provision of additional older people's housing in the parish would therefore meet this need and would also make available additional family housing to enable younger families to move into or remain in the parish. The Neighbourhood Plan will therefore be supportive of proposals which include housing designed for older people.

## POLICY I: HOUSING

a) The Plan allocates site R22 (Land adjacent to the A12, Ingatestone), as included in the adopted Brentwood Local Plan 2016-2033 and shown on Map 2 as shown on Map 2, for the development of 57 new dwellings. Development proposals on Site R22 should:

- Respond positively and integrate with existing development surrounding the site, particularly in relation to layout, form, scale, appearance and use of materials.
- Create a strong and positive sense of place and identity.
- Provide planting and landscaping on the western boundary of the site to contribute towards the attenuation of traffic noise from the A12.
- Incorporate noise attenuation measures for dwellings on the west of the site, adjacent to the A12, to meet BS8233:2014 standards[1].
- Provide street tree planting as recommended within the Essex County Council Street Material Guide: Design and Good Practice 2012[1], together with proposals for the satisfactory long-term maintenance of newly-planted trees.
- Provide attractive pedestrian and cycle access to Roman Road from all areas of the site.
- Provide appropriate surface water management in accordance with the LLFA's most up to date Sustainable Drainage Systems (SuDS) Design Guide.

b) To address the impacts of the development on the surrounding area, Site R22 should provide contributions towards all necessary infrastructure to be secured and delivered, including:

- Education facilities.
- Open space.
- Community facilities
- Highways and transport provision
- Flood and water management
- Digital infrastructure
- Energy and environmental provision

c) Proposals for residential development will be supported where the proposed development:

- Is located within defined development limits.
- Provides as a minimum a rate of affordable housing which is in accordance with the requirements set out in the Brentwood Borough Local Plan. Development proposals which include affordable housing should outline current local social housing needs and demonstrate how the proposed housing mix will assist in meeting the identified local needs.
- Locates affordable housing throughout the development, which is designed to be identical in design and quality as market housing within the new development.
- Includes housing types and tenures which meet the current and future housing needs of the parish taking into account the existing housing stock. Development proposals should outline current local housing needs and demonstrate how the proposed housing mix will assist in meeting the identified local needs.
- Is accessible to local services and facilities by good quality walking and cycling routes, including where necessary new connections to the existing walking and cycling network.
- Provides appropriate surface water management in accordance with the LLFA's most up to date SuDS Design Guide and provides appropriate waste water drainage.
- Contributes positively towards green infrastructure within the parish.
- Would not result in significant harm to heritage assets (both designated and non-designated) in the surrounding area.
- Provides parking in accordance with the Essex County Council Parking Standards – Design and Good Practice (2009), or as subsequently amended.
- Would not result in a detrimental impact on local highways safety and where possible improves highway safety within the parish.
- Protects and enhances important features of the natural environment and biodiversity of the site and its surroundings.
- Provides enhanced connectivity to local services, amenities and public transport.



# DESIGN OF NEW DEVELOPMENTS



## HOUSING DESIGN

The National Design Guide<sup>8</sup> states that: “creating high quality buildings and places is fundamental to what the planning and development process should achieve. The long-standing fundamental principles for good design are that it is: fit for purpose; durable; and brings delight”.

All new development should seek to provide the highest possible design standards. The RIBA House of the Year 2019, a low budget basic house in Northern Ireland and the RIBA Stirling Prize 2019, public housing in Goldsmith Street, Norwich, both demonstrate that good design does not need to be expensive and difficult to achieve.

All that is needed is vision together with a determination to leave a lasting legacy that rises above the mundane and the ordinary. Tor Bryan (Figure 4) in Ingatestone, when created, was different and very contemporary, has stood the test of time and is now a legacy to good design of its time. New development within the parish should seek to undertake a similar approach to design, providing innovative designs and striking aesthetics founded on vernacular principles.



Figure 4: Tor Bryan

The parish council supports the use of innovative design features which will enhance the overall quality of the development. The parish council encourages the use of natural materials, incorporating features such as green roofs, to enhance the design quality of the building and respond effectively to challenges associated with climate change. New development should seek to create sustainable development with a strong sense of identity.

### Footnotes

<sup>8</sup> National Design Guide, Ministry of Housing, Communities and Local Government, 2019, quotes from pages 2 and 3.

<sup>9</sup> <https://www.bregroup.com/greenguide/podpage.jsp?id=2126>

<sup>10</sup> [www.passivhaustrust.org.uk](http://www.passivhaustrust.org.uk)

Schemes should ensure that unique attributes assigned to individual properties contribute to an overall sense of coherent identity for the development. In addition, ancillary buildings and screen walls should seek to reflect the style, detail and materials of the main property.

In relation to the use of materials, it is recommended that:

- New development proposals use a limited palette of materials so as to reinforce the identity of the whole.
- Soft red/orange bricks, dark stained timber and render for walls and plain tiles and pantiles for roofs would assist new developments in contributing positively to the character and appearance of the area.
- Patinated or quartz zinc and non-combustible coloured panels such as Rockpanel are suitable modern materials which would contribute positively to the character and appearance of the area.
- The Building Research Establishment (BRE) Green Guide to Specification<sup>9</sup> should inform the selection of materials within new developments to ensure the use of the most sustainable available materials.

New development proposals should demonstrate how buildings have been designed in a sustainable manner which seek to reduce carbon emissions, for example taking into account building orientation, solar gain, insulation and airtightness.

In order to achieve this, the parish council encourages developments to incorporate Passivhaus<sup>10</sup> standards which seeks to significantly reduce energy consumption for the heating and cooling of buildings.

Since 2009 a government panel has been considering issues associated with housing for older people, called Housing our Ageing Population: Panel for Innovation (HAPPI). The HAPPI reports have identified 10 recommendations to improve housing quality for older people, which include:

1. Generous/flexible space standards.
2. Natural light (including circulation spaces).
3. Avoidance of internal corridors and single aspect dwellings for light and ventilation.
4. ‘Care ready’ homes to accommodate emerging technologies.
5. Circulation that avoids institutional isolation and encourages interaction.
6. Lively multi-purpose social spaces that link with the community.

7. Engagement with the street.
8. Energy efficient 'green' buildings.
9. Adequate storage inside and outside the home.
10. Shared outside spaces with pedestrian priority.

The parish council supports the approach to the design of older peoples' housing set out in the HAPPI reports and therefore expects these principles to be implemented within new older peoples' housing developments.

The parish council supports the aims of the Essex Design Guide in promoting a high standard of design within new development. The parish council supports the guide where it states that:

"Current solutions to entice the buying public involve the application of 'historic features' provided for their symbolic, rather than visual, qualities. The objective should be to abandon pointless efforts and return to basic good design"<sup>11</sup>.

"...there is still room for a range of new inventions that respect the visual and technical limitations of the format while achieving a special new impact. The answer lies partly in rediscovering and exploiting old virtues such as texture and modelling"<sup>12</sup>.

"While we tend to look to the towns and villages of the past for inspiration, new circumstances should give rise to new experiences"<sup>13</sup>.

## POLICY 2: DESIGN OF NEW DEVELOPMENTS

### A. Development proposals should:

- Contribute positively to the existing local historic character and appearance of the area, presenting modern design features which reflect locally distinctive architectural styles.
- Include a high-quality design which will contribute positively to the character and appearance of the surrounding area.
- Reflect, integrate and respond positively to the scale, design, character, density and layout of existing development in the surrounding area and not result in significant harm to neighbouring residential amenity.
- Where appropriate, create a strong and positive sense of place and identity.
- Incorporate an appropriate use of materials which enhances the quality of design, defines routes and spaces and preserves and enhances the character of the area.
- Consideration of the layout and orientation of buildings within sites when seeking to achieve energy efficiency, energy conservation and efficiency, flood resilience, and sustainable waste and water management.
- Design appropriate SuDS proposals to manage surface water at its source and water quality using a variety of SuDS methods such as infiltration, interception, rainwater harvesting, and greywater recycling, which include source control features such as permeable paving, water butts, rain gardens, green roofs, and site control features such as swales, ponds and detention basins.
- Where possible, create interesting views in and out of development through public open spaces.
- Provide an appropriate provision of off-street parking in accordance with the adopted Essex County Council Parking Standards.
- Seek to limit the visual impact of car parking through the use of garages, car ports, off rear parking areas and planting. Any

solutions should be in accordance with BBC's parking standards – Parking Standards: Design and Good Practice 2009, which they adopted as a Supplementary Planning Document (SPD) on 10 March 2011.

- Provide appropriate on-site waste storage facilities.
- Provide street tree planting as recommended within the Essex County Council Street Material Guide: Design and Good Practice 2012<sup>14</sup>.
- Preserve views of local landmarks, open space, green infrastructure and the wider rural landscape, which contribute to the rural character and appearance of the area.
- Create an accessible and inclusive design for all age groups and abilities.
- Provide a safe and secure environment, including measures through design and layout which will seek to reduce and prevent crime and enhance personal safety.
- Incorporate sustainable design features which promote energy efficiency and conservation, renewable energy generation, innovative low carbon technology, water efficiency, flood resilience, biodiversity gains and sustainable waste and mineral management. Proposals should take account of the Essex Climate Action Commission (ECAC) report 'Net Zero: Making Essex Carbon Neutral' in the design of new developments..

B. New proposals for older people's housing should demonstrate how the HAPPI principles have been incorporated into the design of the development. In new developments of 20 or more, a minimum of 5% of new homes should be built to Building Regulations Part M4 (3) a standard which ensures that at least some new homes will be suitable for occupation by wheelchair users.

C. All non-residential development should achieve a minimum of BREEAM 'very good' rating or be supported by a bespoke assessment that demonstrates appropriate environment performance results above current Building Regulation requirements.

### Footnotes

<sup>11</sup> Essex Design Guide, 2018, Architectural Details VI, page 22, paragraph 1.62.

<sup>12</sup> Essex Design Guide, 2018, Architectural Details VI, page 22, paragraph 1.64.

<sup>13</sup> Essex Design Guide, 2018, Architectural Details VI, page 22, paragraph 1.67.

<sup>14</sup> Street Materials Guide, Design and Good Practice, ECC, 2012, or any future replacement document.



# HERITAGE



# HERITAGE

## VISION AND OBJECTIVES

To conserve and enhance the historic environment within the parish.

## CONTEXT

For the purposes of this policy, heritage assets are buildings, monuments, sites, places, areas or landscapes which are identified as having a degree of significance meriting consideration in planning decisions because of their heritage interest. This includes designated heritage assets and non-designated heritage assets which are included within the BBC local list of non-designated heritage assets.



Figure 5: The Bell

The parish contains a large amount of heritage assets, including three conservation areas identified within the assets maps (Maps 3, 4 and 5). Two conservation areas are located within Ingatestone, which was a major and prosperous coaching village from the end of the 18th century and early 19th century, mainly due to its location on the old Roman Road between London and Colchester. The village still contains some historic

Figure 6: Almshouses



Figure 7: Ingatestone Station

coaching inns (Figure 5) where the predominant architectural style is Georgian. The village also still retains the original medieval street plan with many property boundaries dating from that period.

The High Street Conservation Area, as shown on the map at Appendix 2, contains 35 designated heritage assets and a number of protected trees within the historic core of the village. Traditional shop fronts are an important character feature of the High Street and there are a large number of undeveloped rear yards accessed through carriage arches and narrow openings in the building line. The brick tower of the church of St. Edmund and St. Mary provides a landmark feature which contributes to attractive views throughout the village. The High Street is densely built up with buildings predominantly abutting the pavement edge.

The Station Lane Conservation Area, as shown on the map at Appendix 3, contains five designated heritage assets and is predominantly residential containing substantial detached houses in large garden plots set back from the road edge. The character is derived largely from houses built in the late 19th and 20th centuries, including Victorian buildings which provide strong architectural character to the area.

The Ginge Petre Almshouses (Figure 6) and the railway station (Figure 7) are important Grade II listed buildings within the conservation area, built in the 1840's in a picturesque red brick



Figure 8: House designed by George Sherrin

Tudor revival style. The conservation area contains buildings by Victorian architect George Sherrin (Figure 8). These buildings have shaped the character and appearance of the conservation area, often featuring red brickwork, clay tiles and false half-timbered gables. The Red House Lake was associated with Sherrin's own home, the Gate House and therefore forms an important historic landscape feature within the conservation area.

The third conservation area in the parish is located in Fryerning, as shown on the map at Appendix 4, (Figure 9). The village is located on a gently hilly landscape which would have been attractive to early settlement and St Mary's church is located on a prominent hill at the southern end of the conservation area and village. The Fryerning Conservation Area consists of detached houses set on spacious plots. Large oak trees make a significant contribution to the character of the conservation area, enhancing the seclusion of the individual houses and shading the lanes. Apart from one or two late medieval and Georgian buildings, most of the houses are 20th

century in the Arts and Crafts style. The houses around Mill Green Road form a notable group of buildings in this style.

The parish has a historic character and appearance which should be preserved and where appropriate enhanced, for the enjoyment of current and future generations.

Figure 9: Fryerning Sign



### POLICY 3: HERITAGE

a) Development within the three Conservation Areas within the Plan area, which are shown on the maps at Appendices 2-4 conservation areas which are identified on the Parish Map and should demonstrate how the proposals will protect the character, appearance, setting and historical interest of the Conservation Area.

b) Development proposals should seek to protect and where appropriate enhance, heritage assets within the parish. Development proposals which affect a designated or non-designated heritage asset should outline the historical significance of the asset and the local importance of the asset to the character and appearance of Ingatestone and Fryerning

and should clearly outline the impacts of the proposed development on the historical significance and local importance of the asset.

Relevant evidence base documents:

- Ingatestone High Street Conservation Area Appraisal and Management Plan, ECC, 2008.
- Fryerning Conservation Area Appraisal and Management Plan, ECC, 2011.
- Station Lane, Ingatestone, Conservation Area Appraisal and Management Plan, ECC, 2008.

# ECONOMY

THE STAR

GRAY & SONS

INGATESTONE and FRYING  
PARISH COUNCIL

No Access For  
Unauthorised Vehicles

STAR LANE



# ECONOMY

## VISION AND OBJECTIVES

The following economy related objectives form part of the vision statement for the IFNP:

- Supporting measured, proportionate, timely and sustainable development to meet local requirements, particularly those of our young people and older residents.
- Promote a flourishing local economy with a range of successful independent businesses.

As an existing commuter village, Ingatestone will increase its local employment base with the aim of reducing its export of people.

The growing population of the parish will be supported with employment sites, appropriate retail outlets and a thriving economy.

The parish will have the transport connections, available space, facilities and infrastructure to support new and expanding businesses as and when the need arises and the parish council will be active in searching out opportunities for bringing new employment to Ingatestone and Fryerning.

The following economy related aims have been identified by NPAC to guide the production of the IFNP economic policies:

- Preserve and grow the High Street (Figure 10) with predominantly thriving independent shops.
- Encourage business, especially those that can employ local people and are in growth sectors such as technology, creative arts, healthcare, renewable energy, professional education and tourism.
- Maintain and grow the key local economic drivers within the parish.

## CONTEXT

### Economic Statistics

The Rural Community Profile for Ingatestone and Fryerning<sup>15</sup> identified the following key statistics<sup>16</sup> associated with the economy of the parish.

- There are 2,271 economically active residents in the parish, including 1,252 people employed on a full-time basis.
- The proportion of economically inactive residents in the parish is higher than the national average. This may relate to the higher age demographic in the area.

- There are 421 self employed residents in the parish. This represents a higher proportion of the population than the national average.
  - 165 people work from home in the parish. This is also a higher proportion of the population than the national average.
  - The parish has a lower proportion of residents claiming jobseekers allowance in comparison to the national average.
  - There is a higher than national average proportion of residents in the parish with degree level qualifications.
- The largest employment sectors in the parish are financial and insurance, retail and education.
- There is a higher than national average proportion of residents in the parish employed in managerial, professional or administrative roles.
- There is a lower than national average proportion of residents in the parish employed in skilled and elementary<sup>17</sup> occupations.



Figure 10: High Street

### The local economy

The parish contains two key transport routes which act as key economic drivers for the area. The A12 runs along the western and northern edge of Ingatestone and the slip road in the south of the parish provide good access to the wider highways network.

On the south eastern edge of Ingatestone is the Great Eastern Main Line providing regular service to London, Chelmsford and beyond. Ingatestone is serviced by a station, making the village an important location for commuters to use local businesses, services and facilities, before travelling to work or going home. The quality of the transport connections within the parish encourage businesses to locate in the area and also makes the area a more attractive location for tourists.

There are 215 operating businesses in the parish, predominantly located within Ingatestone. To inform the production of the Neighbourhood Plan, in summer 2018 a business questionnaire was published which sought to identify priorities and issues for local businesses in the area. The majority of respondents

<sup>15</sup> Rural Community Profile for Ingatestone and Fryerning, Rural Community Council for Essex (RCCE), 2013.

<sup>16</sup> Unless specified otherwise, all statistics are from 2011 census data.

<sup>17</sup> An elementary occupation consists of simple and routine tasks, such as cleaners, agricultural labourers, food preparation assistants and refuse workers.

to the survey were from businesses on or near the High Street in Ingatestone, which therefore included a large proportion of wholesale and retail related businesses. The questionnaire identified the following key issues for the area:

A high proportion of local employees live more than five miles from their place of work.

- 75% of local employees use a car to get to work.
- Over half of respondents believe that theft through burglary/shoplifting is a current problem in the parish.
- There is a need for more local events, markets and schemes to encourage passing trade and new business to the High Street.
- Transport and parking were cited as the biggest issues for the recruitment and retention of staff in the area (67%), followed by issues with finding the right skills (40%), wage competition (33%) and shortage of affordable housing for employees in the local area (29%).
- The most significant infrastructure challenges for local businesses in the area were identified as mobile coverage (75%), parking (63%) and trade waste (43%).
- 60% of respondents plan to stay within the parish over the next five to 15 years.
- New retail space was identified as the most required type of new business premises in the parish.
- Businesses in the area would like more parking to be made available, preferably free parking, better mobile/broadband provision and more parish council support to encourage local shopping and support small businesses.

The extent of people working on or near the High Street travelling to work by car highlights the need to consider further parking arrangements within the centre of Ingatestone and particularly parking for local businesses, as well as exploring how these employees might be encouraged to travel sustainably.

The parish council is awaiting the outcome of a parking safety audit being undertaken by Essex County Council (ECC) to consider a future approach to improve parking arrangements in the central area of Ingatestone. Through discussions with ECC and developers associated with sites allocated in this Plan, the parish council will seek opportunities to provide additional car parking to service the central area of the parish.

### Retail on Ingatestone High Street

The adopted Brentwood Local Plan (BLP) Policy PC08, retail hierarchy of designated centres, identifies Ingatestone as a District Shopping Centre where Brentwood BBC would support “localised retail, commercial, flexible workspace, community facilities and services that reduce the need to travel and contribute towards more sustainable and neighbourhood-scale living”.

To retain the retail offer and the provision of community services and facilities considered appropriate within the District Shopping Centre, LDP Policy PC10, Mixed Use Development Centres, seeks to retain the use of retail premises and associated

uses in Ingatestone High Street for purposes appropriate for a District Shopping Centre. The LDP outlines the appropriate uses for Ingatestone High Street.

The majority of retail premises in the parish are located on Ingatestone High Street and the active shop frontages along the High Street are important to the character of this area as the centre of the village. To protect and support existing retail premises on the High Street and to maintain the function and character of this area, sections of Ingatestone High Street identified in Map 3 have been allocated as ‘Primary Retail Frontage Areas’. New development within the Primary Retail Frontage Areas should support and enhance retail and associated uses within the area, providing active frontages at ground floor level which respond to character of the area as the centre of the village.

The parish council will support the following uses at ground level within the Primary Retail Frontage Areas along Ingatestone High Street:

- Shops (E(a)).
- Financial and professional services (E(c)). Cafés and restaurants (E(b)).
- Drinking establishments (A4 uses).
- Takeaways (A5 uses).
- Hotels (C1).
- Non-residential institutions such as healthcare, nurseries, schools, libraries and places of worship (D1 uses).
- Certain sui generis uses typically found in centres, including theatres, nightclubs, amusement arcades, launderettes, tattooists, beauty parlours.

A greater range of uses will be appropriate at first floor level within the Primary Retail Frontage Areas, provided that the above uses do not inhibit the use of the ground floor for the uses listed above. The ground floor change of use of premises within the Primary Retail Frontage Areas from the uses listed above will not be supported by the parish council unless the applicant can provide compelling evidence and justification that the existing use is no longer viable. This must include evidence that the site has been appropriately and effectively marketed over a sustained period of time (a minimum of 12 months) at a rate which is compared to local market value for its existing use, or as a redevelopment opportunity for other similar uses, together with evidence of the level of interest in the site during the marketing period.

As a direct result of engagement with local businesses the parish council has recently overseen, or is currently in the process of developing, a range of improvements to support businesses on or near Ingatestone High Street, including:

- The repositioning of mobile phone antennae to improve mobile signal.
- Improvements to CCTV to provide increased surveillance coverage and improved safety.



- Seeking to appoint two Community Police Officers. Developing
- a business support network.

The business questionnaire has revealed overwhelming support for retaining Ingatestone High Street as a vital and active retail area. The parish council is keen to support businesses on or near Ingatestone High Street and is seeking to develop projects which will:

- Increase footfall.
- Improve travel into the High Street area.
- Provide additional parking for businesses employees and customers.
- Provide training for retailers.
- Provide growth and development support to local businesses.
- Create events or attractions to encourage visitors to Ingatestone as a tourist destination.
- Providing community WiFi or 5G along Ingatestone High Street.

The parish council is an active participant of the Brentwood Business Partnership (BBP)<sup>18</sup> and is included in developing activities aimed at increasing local trade, such as the annual Easter Egg Hunt for children looking for egg pictures in shop windows, an art trail and the Summer Hunt searching for emblems associated with summer.

Protecting existing employment uses in the parish in order to maintain and improve the status of the area as a thriving economic centre, the parish council will seek to protect existing employment land in the area. Through IFPC Economy Policy 4, the parish council is seeking to expand the provision of employment and safeguard existing employment land within the parish. Proposals which seek to change the use of an existing employment site (class B1, B2, B8 or sui generis use of an employment nature) at a rate which is comparable to the local market value for its existing use, or as a redevelopment opportunity for other similar uses, together with evidence of the level of interest in the site during the marketing period.

### The future economy of the parish

Tourism has been identified as an opportunity to increase retail trade on Ingatestone High Street. Ingatestone has an interesting character, a good range of retail premises, cafés, bars and restaurants, good links to the surrounding countryside, Ingatestone Hall and many historic buildings, good accessibility by public transport and from the wider highway network and is in close proximity to large centres of population in Chelmsford

and London. Through the establishment of additional events and attractions in the parish, tourism through local and regionally based day visitors could provide an additional boost to the local economy.

As an additional attraction for the area, funding has been received for the completion of the Ingatestone Museum (Figure 11). Greater Anglia are in the process of restoring the building adjacent to the level crossing on Station Lane, through a combination of funding from Greater Anglia and



Figure 11: Museum site

the Railway Heritage Society, to provide the building for use as the Ingatestone Museum. The project will be managed by a charitable trust and restoration work is expected to be completed in 2020. Alongside the museum, the parish council intends to improve signage throughout the villages to improve the overall experience for visitors.

Demographic census information<sup>19</sup> of the parish demonstrates that there is a high proportion of people aged 65 and over in the parish and this trend is likely to continue in the future. Employment within the older age care and healthcare sectors within the parish is therefore likely to increase in the future. The Neighbourhood Plan will seek to encourage more employment opportunities within the parish to encourage economically active people to the area, to create a sustainable balance of older and younger people living and working within the parish.

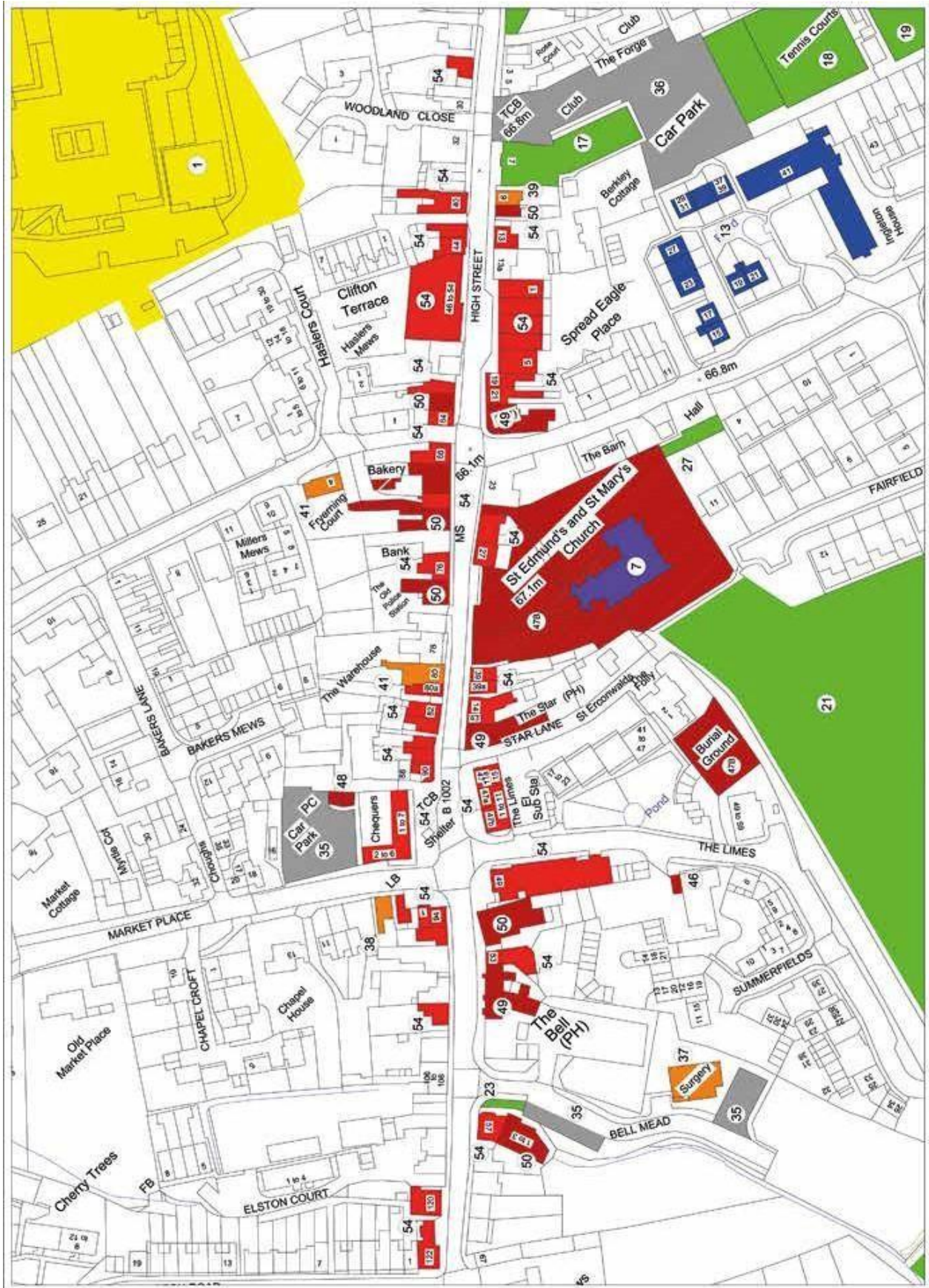
Subject to compliance with other policies in this plan, the parish council will be supportive of development proposals which increase employment opportunities in the local area and support the local economy. Based on the high proportion of residents educated to degree level and beyond, the high proportion of managerial and professional workers in the area and the small scale nature of business which would be likely to locate within the parish, the parish council will encourage new business development proposals associated with growth sectors such as advanced technologies, creative arts, education, renewable energy and low carbon, health and care sectors and tourism.

### Footnotes

<sup>18</sup> Brentwood Business Partnership is a partnership between Brentwood businesses, local business organisations and Brentwood Borough Council. The Partnership seeks to raise awareness of Brentwood as a thriving place for businesses, visitors and residents; increase footfall and encourage local spend to grow the local economy; support retailers, businesses, tourism and the night-time economy; and sponsor events and projects to attract more business and improve the public realm. Further information is available from: <http://www.discoverbrentwood.co.uk/Business/brentwood-business-partnership.asp>.

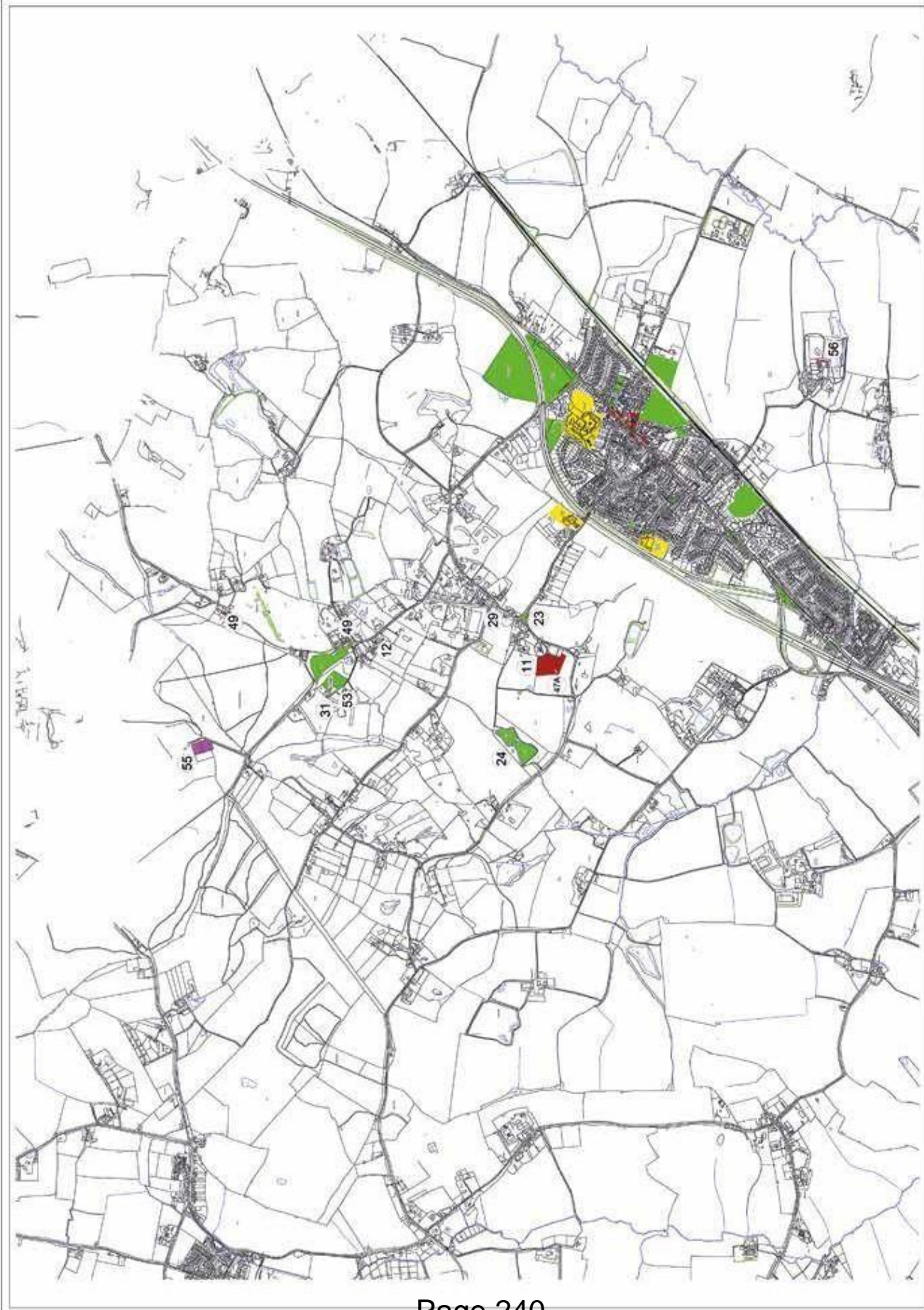
<sup>19</sup> Rural Community Profile for Ingatestone and Fryerning, Rural Communities Local Plan Essex (RCCE), 2013.

Map 3: High Street Map. Copyright Phill Poston/Elaine Jeater 2019



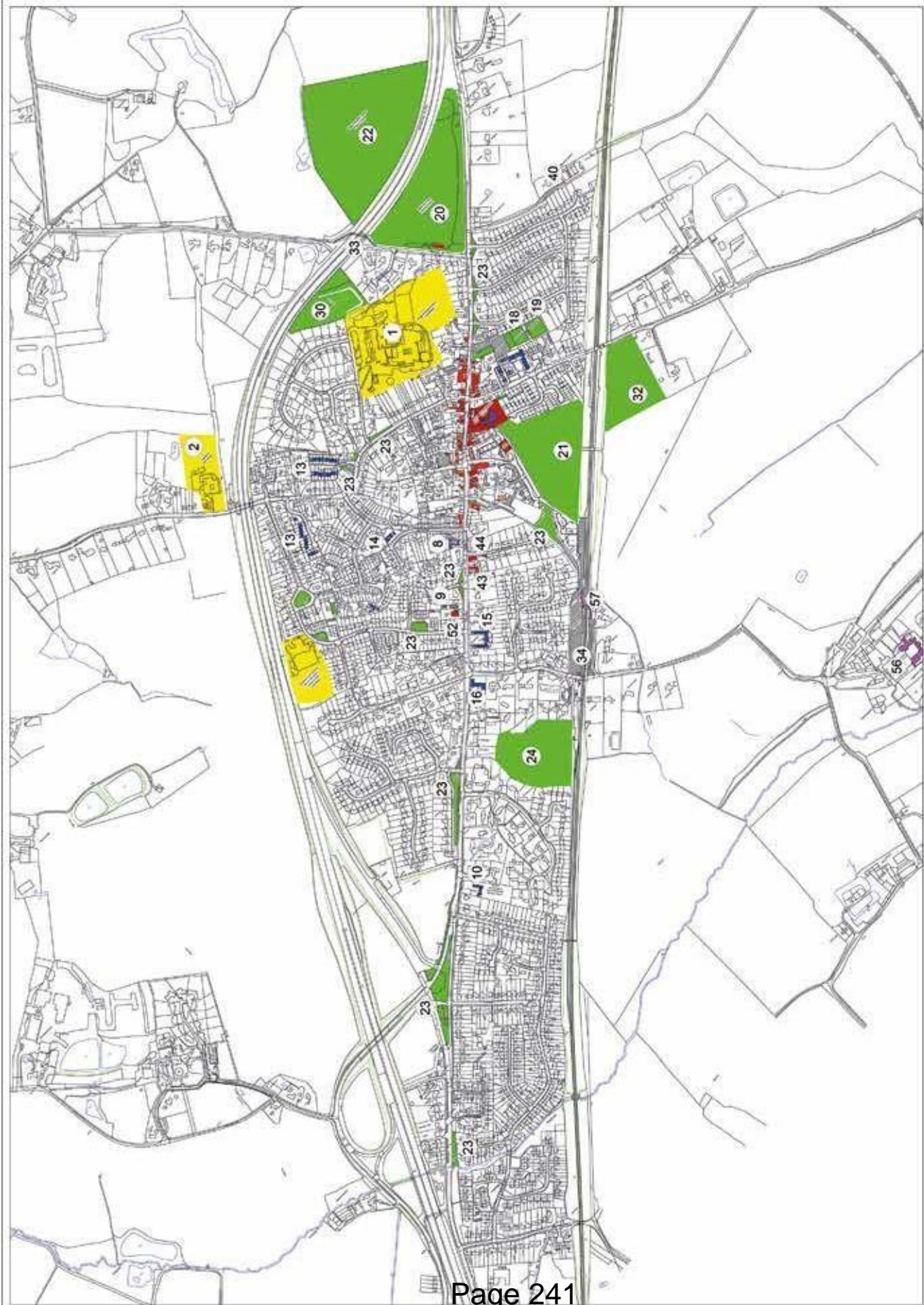


Map 4: Parish Map. Copyright Phill Poston/Elaine Jeater 2019.





Map 5: Village Map. Copyright Phill Poston/Elaine Jeater 2019.





## KEY TO COMMUNITY ASSETS MAP (Maps 3, 4 and 5)

### COLOUR AMENITY/ NUMBER IDENTIFICATION ASSET

Yellow	Education	1	Anglo European School
		2	Ingatestone Infant School
		3	Ingatestone and Fryerning C of E (voluntary aided) Junior School
		4	Wright Start Day Nursery
		5	Roman Road Pre-school URUS playgroup
		6	EMU under 5's club
Purple	Religious establishments	7	St Edmund and St Mary Church of England Parish Church, Ingatestone
		8	United Reformed Church
		9	Elim Church
		10	St John the Evangelist and St Erconwald Catholic Church
		11	St Mary the Virgin Church of England Parish Church, Fryerning
		12	Mill Green Gospel Chapel
Blue	Specialist Housing	13	Brentwood Borough Council sheltered accommodation
		14	Essex CC Youngperson assisted living
		15	The Almshouses
		16	Ardtully nursing residence
Green	Community recreational land and buildings	17	Ingatestone Community Club
		18	Ingatestone Tennis Club
		19	Ingatestone Bowls Club
		20	Seymour Field and Pavilion (BBC owned)
		21	Fairfield Cricket ground and children's play areas (leased by Parish Council)
		22	Anglo European playing fields
		23	Amenity greens, roundabouts (BBC)
		24	Fishing lakes + ponds
		25	Ingatestone Boys' Own Club
		26	Christy Hall
		27	C of E Church parish rooms Ingatestone
		28	URC hall
		29	Parish Rooms Fryerning (Community Club)
		30	Copse
		31	Mill Green common
		Grey	Parking and underpasses
34	Railway car park (private)		
35	Public car park		
36	Private car park (Community Club)		

### COLOUR AMENITY/ NUMBER IDENTIFICATION ASSET

Orange	Healthcare	37	Doctors' surgery	
		38	Private dentist	
		39	Optician	
		40	Veterinary surgeon	
		41	Pharmacist/chemist	
		42	Chiropodist	
Brown	Services	43	Library	
		44	Post Office and sorting office	
		45	Railway Station	
		46	Parish Council Offices	
		47 A	Parish cemetery (Parish Council) – open	
		47B	Closed burial grounds	
		48	Public toilets	
		49	Public houses	
		50	Restaurants	
		51	Cafes	
Black Stripe	Area of Special Scientific Interest	52	Fire Station	
		53	Mill Green Common	
Red	Shops	54	Shops	
Pink	Historical:	Scheduled monument	55	Roman villa (near Handley Barns) List entry Number: 1008875
		Special historical/ archaeological interest	56	Ingatestone Hall List entry Number: 1187315 Grade 1 listed
			57	Name: Ingatestone Railway Station List entry Number: 1279577 Grade 2 listed
		Historic England	58	Mill Green Windmill List entry Number: 1297199
		Historic England	59	The Viper public house 1460278 Grade 2 listed
Black Cross	Special features/ infrastructure	60	The 3 Stones (sarsens)	
		61	Red Telephoneboxes	
		62	Milestone	
		63	War memorials	
		64	Parish council owned 'bus shelters	

## ECONOMY continued...

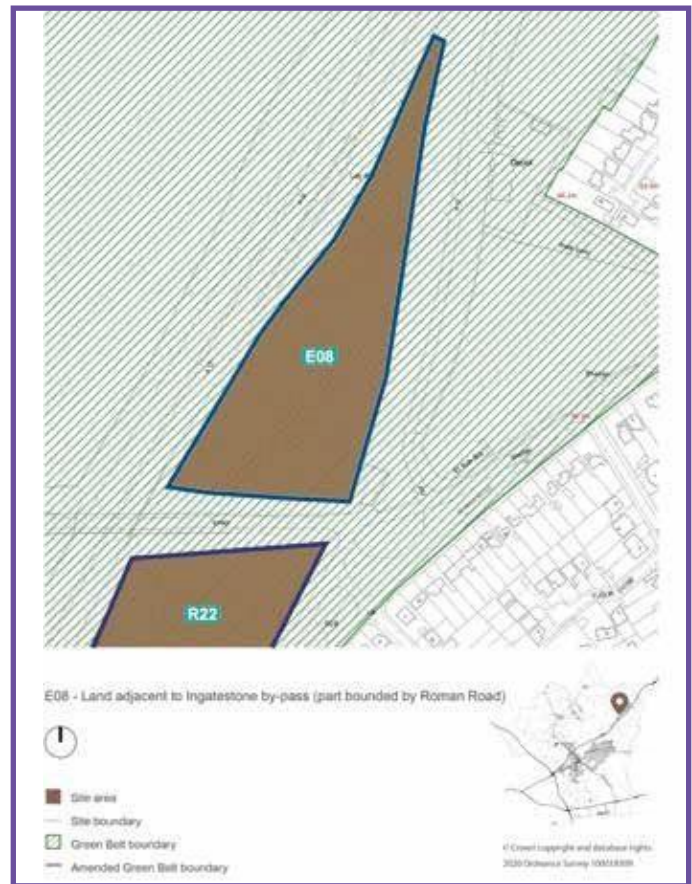
The parish council will also be supportive of development proposals which provide infrastructure which supports and enhances economic activity in the parish, particularly in relation to improving public transport services and facilities and enhanced provision of mobile services and ultra-fast broadband, and at least of superfast speeds.

### Employment allocations in the Brentwood Borough Local Plan

Site E08 of the LDP proposes the allocation of 2.06ha of employment land adjacent to the A12 and slip road in Ingatestone (Map 6). Site E08 is proposed for uses B1, B2, B8 and any associated employment generating sui generis<sup>20</sup> uses, with access from Roman Road (B1002).

The parish council supports this employment allocation and would also be supportive of the following additional uses on the site alongside employment related uses where appropriate:

- Financial services (E(c)(i) use)
- Professional services (E(c)(ii) use)
- Gymnasium (e(d) use)
- Managed Shared Offices (B1 use)
- Retail (E(a) use)
- Medical or Health services (E(e) use)
- Offices with administrative functions (E(g)(i) use)
- Storage or distribution (B8 use)



Map 6: Employment land allocation, E08, land adjacent to A12 and slip road, Ingatestone<sup>20</sup>

## POLICY 4: ECONOMY

a) Land adjacent to the A12 and slip road, Ingatestone, identified in the Policies Map as Site E08 as shown on Map 6, is allocated for 2.06ha of employment land. The following uses are permitted on this site:

- E(g), B2, B8 and any associated employment generating sui generis uses as principal uses on site.
- E(a-f) and ancillary uses, where it is demonstrated that the location of these uses will not inhibit the operation of the principle uses on the site.

b) The parish council will be supportive of development proposals which increase employment opportunities in the local area and support the local economy. To enhance the local economy in an appropriate and sustainable manner, employment generating development proposals will be supported where they:

- Diversify the local economy e.g. technology/business park.
- Enable new businesses to locate within the parish, e.g. financial and healthcare facilities.
- Protect, support and improve existing businesses and employment land within the parish.
- Provide benefits to the local economy and community which outweigh any harmful impacts of the proposals.
- Are located in areas which are accessible to the surrounding highways network and sustainable transport network including public transport services and cycle and pedestrian routes, without

having a significant detrimental impact on the levels of traffic or congestion in the parish.

- Will not detrimentally impact upon residential amenity, health and quality of life of existing residents.
- Provide additional tourist attractions and/or facilities for visitors within the parish.
- Provide infrastructure which supports the use of ultrafast broadband and 5G mobile telecommunications.
- Provide appropriate surface water management in accordance with the LLFA's Sustainable Drainage Systems (SuDS) Design Guide.

c) Sections of Ingatestone High Street identified in the Policies Map are designated as Primary Retail Frontage Areas. Development proposals which support and enhance retail and associated ancillary uses (E uses, E(e-f) and F1 and sui generis uses typically found in centres) on ground floors in this area will be supported and encouraged.

d) The design of shop fronts in the Primary Retail Frontage Area should seek to maintain and enhance the character of Ingatestone High Street as the centre of the village, particularly through active retail frontages at the ground floor level facing the High Street.

### Footnotes

<sup>20</sup> Map from the Brentwood Borough Local Plan, pre-submission version, February 2019



# TRANSPORT

# TRANSPORT

## VISION AND OBJECTIVES

The following transport related aims and objectives form part of the vision statement for the IFNP and have been identified to guide the production of the IFNP transport policy:

- Giving consideration to effective transport links, the staffed train station (Figure 7), the bus service and access routes for the movement of cyclists and pedestrians.
- To reduce the rate and incidence of congestion.
- To enhance accessibility to key services and facilities within the parish.
- To improve safety on the road network and to enhance and promote a safer travelling environment around the parish.
- To manage the impact of road transport on air pollution.
- To maintain highways and public rights of way to a standard appropriate to their use.
- To support and encourage new technologies such as autonomous vehicles and electric charging points.



Figure 7: Railway station

## CONTEXT

### Access by car and parking

The B1002 runs through the centre of Ingatestone, forming the High Street and Roman Road beyond. Ingatestone is a linear village sited between the A12 on the north western edge of the village and the Great Eastern Main Line on the south eastern edge. The A12 provides a bypass for Ingatestone for vehicles travelling between Brentwood, Chelmsford and beyond. There are around 3,000 cars available to households in the Parish, which equates to around 1.44 cars per household<sup>22</sup>. This

### Footnotes

<sup>22</sup> Based on 2011 Census data.

<sup>23</sup> Rural Community Profile for Ingatestone and Fryerning, Rural Community Council for Essex (RCCE), 2013.

<sup>24</sup> Brentwood Parking Strategy, Strategic Options Development Report, JMP Consultancy Ltd, 2016.

is higher than the Essex and national averages for car ownership, which reflects the rural nature of many areas of the parish<sup>23</sup>.

There are a total of 398 car parking spaces in Ingatestone, including parking areas in Market Place, the Community Centre, the High Street and Bell Mead. The train station provides 251 car parking spaces, managed by NCP. Parking at the station currently costs £6.80 per day, £27 for a weekly pass and is open 24 hours a day. There are also 48 bicycle parking spaces.

There are few designated street parking spaces in Fryerning, with the exception of two-three spaces outside the Parish Rooms and the church of Saint Mary the Virgin.

In 2016, BBC published the Brentwood Parking Strategy, Strategy Options Development Report<sup>24</sup>, which reviewed all BBC owned and operated off-street parking facilities across the borough. The report acknowledged that Ingatestone has parking demand and supply problems, but notes: “that there are limited opportunities to improve the situation due to the size of the town and its geographic location between the railway line (to the south) and A12 (to the north)”.

In relation to Ingatestone, the strategy concluded that:

- The provision of additional short-term parking in Ingatestone would be beneficial for accessing the available retail offer, however geographical constraints impede the ability to expand current parking provisions in the area.
- Given the key role of Ingatestone as a commuter location, an appropriate balance between short-stay and commuter parking is required.
- Improved wayfinding and signage infrastructure can help to improve navigation for visitors and help to identify the location of all car parks.
- Effective enforcement can help to improve the efficiency and management of parking and minimise incidences of inappropriate parking and speeding.

The parish council recognises the need for additional car parking provision within Ingatestone and will therefore be supportive of development proposals which provides or contributes towards improved additional parking. ECC are currently undertaking a parking safety survey of Ingatestone.

This survey is expected to identify areas of the village where parking arrangements may need to be amended to ensure the safety of all users. Through the progression of this work, the parish council will seek to work with ECC to consider how parking within the village, particularly around the High Street, could be improved and expanded to meet existing and future parking requirements.



In addition, the parish council will also liaise with Abellio Greater Anglia and Network Rail to consider the possibility of increasing car parking facilities at Ingatestone train station. If parking provision at the station cannot be increased sufficiently, consideration could be given to the development of paid parking elsewhere in the village.

IFNP Transport Policy 5 seeks to improve and where possible increase parking provision for local businesses, customers and commuters within the parish. The parish council will therefore not be supportive of proposals which may reduce the provision of parking within Ingatestone.

With the exception of the NCP train station car park, the majority of parking within Ingatestone is free and feedback from the summer 2018 IFNP questionnaires identified that local people consider existing parking provision in the parish to be vital in supporting Ingatestone's shops and businesses. The questionnaires identified parking as one of the top three items of concern for respondents.

Questionnaire responses identified the following parking related issues in the parish:

- The lack of all-day parking around New Road and the High Street.
- The cost and availability of parking for employees without their own spaces.
- Dangerous parking in the High Street and its junctions.
- Parking around the schools at drop-off and pick up times.
- The provision of sufficient parking within new housing developments.

BBC adopted the Essex Parking Standards<sup>25</sup> as a Supplementary Planning Document (SPD) in 2011 and continues to expect new development to comply with these design and provision standards. The IFNP supports this approach and will therefore expect all new development proposals in the parish to accord with the Essex Parking Standards. The provision of car parking in new developments needs to be carefully designed and positioned to create a distinctive sense of place and ensure that the parking area does not dominate the public realm.

### Sustainable transport

The Climate Change Act commits the UK to reducing CO<sub>2</sub> emissions and at international level the Paris Agreement commits the UK to taking action on climate change to reduce global average temperatures. The approach to transport planning within IFNP Transport Policy 5 should reflect the need to reduce CO<sub>2</sub> emissions in the parish to support climate change mitigation.

Sustainable modes of transport are transport modes which do not rely on the car, such as walking and cycling and public transport such as buses and trains. Encouraging the use of sustainable modes of transport will support a reduction in carbon emissions within the parish. This approach is therefore connected to the aims and objectives of the IFNP Chapter on Environment, Environment Policy 6.

As outlined in chapter five, in addition to encouraging sustainable modes of transport, electric vehicles will also provide an opportunity to reduce carbon emissions and air pollution.

The inclusion of electric vehicle charging points within new development will therefore be supported and encouraged, or as a minimum infrastructure to support the provision of charging points in the future should be provided.

Public transport services in the parish are only available within Ingatestone. The Great Eastern Main Line runs between London Liverpool Street and Norwich, with access to the Braintree spur line and services to Clacton on Sea and Ipswich. The 23 mile journey to London Liverpool Street from Ingatestone takes around 32 minutes, with regular services at peak times, reduced half hourly off peak services on weekdays and Saturdays and hourly services on Sunday. Ingatestone Station and all trains serving it are currently operated by Abellio Greater Anglia.

Ingatestone Station opened in 1844 and the station is a Grade II listed building. Facilities at the station include a waiting room, part-time café, toilets, a quick fare ticket machine and a staffed ticket sales office.

Feedback within the IFNP questionnaires highlighted the importance of maintaining staff at the station, which is considered important for the safety of passengers, particularly in relation to the safety of a large number of school children that commute into the village daily to attend the Anglo European School.

In recent years passenger numbers at Ingatestone Station have significantly increased. This is due to the accessibility of the station from surrounding areas and the availability of parking facilities near the station. As outlined above, the increased use of the station has detrimentally affected the availability of parking in the village during weekdays, as many commuters will park cars for the day within the village.

The only bus service operating in the parish is the 351 bus route which runs along Ingatestone High Street, providing services between Brentwood and Chelmsford, half hourly from 6am until 6pm on weekdays, hourly services to 8pm on Saturdays and limited services on Sundays.

In relation to facilities for pedestrians and cyclists, there are no dedicated cycle routes within the parish, pavements in

### Footnotes

<sup>25</sup> Parking Standards, Design and Good Practice, ECC, 2009.



Figure 12: Narrow pavement

some areas of Ingatstone are narrow and difficult to use for people with prams or using wheelchairs and mobility scooters and there are no pavements on some roads leading out of Ingatstone, throughout Fryerning and on the majority of rural roads in the parish (Figure 12). Policies within the Local Development Plan (LDP) seek to provide new cycle lanes as part of new developments to increase opportunities for cycling safely.

IFNP chapter six refers to the importance of accessibility and opportunities to exercise through walking and cycling, for people's wellbeing and quality of life. Policy 5 seeks to enhance and improve pedestrian and cycle routes and accessibility to

services and facilities, throughout the parish. Improving the safety and quality of pedestrian and cycle routes within the parish is key to encouraging people to consider walking and cycling as viable alternatives to the car.

The parish council will support development proposals which positively address the needs of pedestrians, cyclists and horse riders. Careful consideration should be given to creating convenient and safe links to surrounding areas. The parish council is also keen to encourage children to develop travel habits relating to walking and cycling which they will continue throughout their lives. Proposals which improve walking and cycling access to schools within the parish will therefore be supported.

A path on Fryerning Lane connects Ingatstone and Fryerning, however the path does not have lighting along the length of the route and is inconsistent in relation to size and quality. An improved path, sufficient to accommodate both pedestrians and cyclists, would encourage the use of this route by pedestrians and cyclists. Within Fryerning there are no pavements, cycle lanes and limited bridleway routes and within Ingatstone there are a number of roads (see Table 1) with poor quality or no pavements. The parish council would therefore be supportive of proposals which improve and increase the provision of bridleways, pedestrian and cycle links within the area. The parish council will also seek to ensure that any new proposals for bridleways, pedestrian and cycle links take into account the needs of all users, particularly people that rely on wheelchairs and mobility scooters.

Table 1: Areas of concern for the safety of pedestrians in the parish

LOCATI ON	ISSU E
High Street, adjacent to the steps entrance to the Star Inn Public House, Ingatstone village.	The pavement is narrow, only 78cm wide.
High Street, on the corner of the Bella Blake shop, Ingatstone village.	
High Street, near Budgens, Ingatstone village.	The pavement is narrow, only 91cm wide.
Stock Lane, Ingatstone village.	No pavement in an area which is likely to have a demand for pedestrian access as a result of surrounding existing buildings and the location of the allotments.
Sections of Bakers Lane, Ingatstone village. The junction of Fryerning Lane and the High Street, Ingatstone village.	No pavement in an areas which are likely to have a demand for pedestrian access as a result of surrounding existing buildings. These roads are also used by pupils of the Anglo European School coming to and from Ingatstone Station and bus service on the High Street.



Figure 13: Fryerning Lane and High Street-stones

## Safety

The lack of separated cycle routes and good quality pavements in some areas of the parish was identified as a safety concern within the results of the IFNP questionnaire.

Table 1 lists areas of the parish where there are safety concerns for pedestrians relating to the provision and quality of pavements. The identified sections of pavement on the High Street are in areas which have high numbers of pedestrians through people accessing shops, pubs, restaurants and St. Edmund and St. Mary's Church.

Sections of Fryerning Lane (Figure 13) and Bakers Lane (Figure 14) without pavements are of particular concern in relation to pedestrian access for pupils of the Anglo European School coming from the train station. On weekdays, hundreds of children walk from the station and from bus services on the High Street to the school at least twice a day and there are safety concerns on sections of the route without pavements. The safety of these children in walking through the village from passing traffic is a significant concern for the parish council.

Through the IFNP questionnaire local residents have raised their concerns regarding the safety of pedestrians and cyclists in the parish where there are no dedicated cycle lanes and poor-quality paths. Unless improvements to the safety of pedestrians.

and cyclists can be implemented, it is unlikely that the level of cycling and walking will increase within the parish.

The speed limit on roads within the village, including those where there are safety concerns for pedestrians, is 30 mph. To increase the safety of the village in areas where pedestrian footfall is highest, the parish council will seek to engage with ECC to consider reducing speed limits to 20 mph. These areas include the walking route for pupils of the Anglo European School to go to and from Ingatestone station. Any changes to speed limits will need to be compliant with Essex County Council Speed Management Strategy and will require the support of the County Council and Essex Police.

To increase the safety of pedestrians around schools, the parish council is also considering the creation of 'School Clear Zones' within Ingatestone, which are areas around schools where the parking or stopping of cars is restricted at specific times of the day associated with school opening and closing times. The purpose of the zone is to significantly reduce traffic from around the immediate vicinity of the school, improving safety for pedestrians and cyclists and also improving air quality around the school. The pupils will be encouraged to walk or cycle from home or drop off zones, encouraging additional physical activity. The proposed location of the School Clear Zone in Fryerning Lane is currently being investigated by the parish council.

The IFNP questionnaire identified pedestrian safety as a concern. As identified in Table 1, there are some areas within the Parish boundary where safety concerns have been identified. The parish council will seek opportunities to improve safety for pedestrians and cyclists, where possible, including the provision of:

- New pavements or designated areas of the road for pedestrians.
- Improved road markings. A
- school clear zone.
- Speed reductions.
- Features which reduce the speed of vehicles, such as speed humps, reduced road widths, speed cameras and additional signage requesting vehicles to reduce speed.



Figure 14: Bakers Lane



## Air Quality

IFNP Policy 5 seeks to ensure that new development does not result in an increase in traffic and congestion which could have a detrimental impact on air quality in the parish.

This requirement is connected to the aims and objectives of the IFNP Chapter on Environment, IFNP Policy 6.

As outlined in chapter five, the parish council will consult with BBC to consider options for air quality monitoring within the parish on Ingatestone High Street and close to Ingatestone Infant School on Fryerning Lane. In the absence of any regular

monitoring, all new major developments (10 dwellings or more<sup>26</sup>) in the parish will be required to demonstrate an understanding of the current air quality surrounding the development site and outline the potential wider air quality implications of the proposed development on the parish.

## Proposed transport improvements for the parish

Through the IFNP summer 2018 questionnaires and additional research to inform the production of this plan, the key transport related projects listed within Table 2 have been identified to maintain and improve accessibility and transport links within the parish.

Table 2: Key transport related projects for the parish

PROJECT	ACTIONS REQUIRED
Improve and increase car parking for commuters using Ingatestone Station.	Engage with Abellio Greater Anglia and BBC to consider options for the future.
Improve and increase car parking within Ingatestone village.	<ul style="list-style-type: none"> <li>NPAC/IFPC to develop specific projects.</li> <li>Engage with BBC to further develop proposed projects.</li> <li>Engage with local developers (where appropriate) to develop car parking projects alongside new development proposals.</li> <li>Identify potential funding sources.</li> </ul>
Improve bridleways, pedestrian and cycle routes throughout the parish. Key locations include: <ul style="list-style-type: none"> <li>Fryerning Lane, connecting Ingatestone to Fryerning. Throughout Fryerning and Mill Green.</li> <li>Ingatestone village, locations identified within Table 1.</li> </ul>	<ul style="list-style-type: none"> <li>NPAC/IFPC to develop specific projects.</li> <li>Engage with BBC and ECC to further develop proposed projects.</li> <li>Engage with local developers (where appropriate) to develop transport projects alongside new development proposals.</li> <li>Identify potential funding sources.</li> </ul>
Ingatestone pedestrian and cyclist safety improvements, including: <ul style="list-style-type: none"> <li>New pavements.</li> <li>Designated areas of the road for pedestrians.</li> <li>Improved road markings. A</li> <li>School Clear Zone.</li> <li>Speed reductions.</li> <li>Features which reduce the speed of vehicles, such as speed humps, reduced road widths, speed cameras and additional signage requesting vehicles to reduce speed.</li> </ul>	<ul style="list-style-type: none"> <li>NPAC/IFPC to develop specific projects.</li> <li>Engage with BBC and ECC to further develop proposed projects.</li> <li>Engage with local developers (where appropriate) to develop transport projects alongside new development proposals.</li> <li>Identify potential funding sources.</li> </ul>

## Footnotes

<sup>26</sup> Major developments as defined within the Town and Country Planning (Development Management Procedure) (England) Order 2015

## POLICY 5: TRANSPORT

Proposals for new development should:

Provide car and cycle parking in accordance with the Essex County Council Parking Standards [16].

Not result in a reduction in car parking spaces within Ingatestone.

- Not result in any detrimental impact on local highway safety and where possible improve highway safety, within the parish.
  - Where possible, protect and enhance public rights of way, pedestrian and cycle routes and bridleways throughout the parish.
  - Not significantly increase levels of congestion within the parish.
  - Where appropriate, improve accessibility and increase the use of sustainable modes of transport within the parish by providing or contributing towards public transport improvements and infrastructure and providing safe pedestrian and cycle routes to surrounding areas, public transport and local services and facilities.
  - Not detrimentally impact air quality and public health within the parish as a result of increased traffic flows and congestion.
  - Create safe and accessible environments, particularly for those with limited mobility.
- Incorporate appropriate and sympathetic lighting to public

- areas which will enhance accessibility and safety.
- Provide infrastructure to support electric and low emission vehicles.

Development proposals for 25 or more dwellings in the parish should assess and clearly demonstrate the impact of the scheme on the local highway capacity and public transport services.

Proposals which improve the safety of pedestrians and cyclists will be encouraged and supported.

Relevant evidence base documents:

Brentwood Parking Strategy, Strategic Options Development Report, JMP Consultants Ltd, 2016.

Parking Standards, Design and Good Practice, ECC, 2009.

Rural Community Profile for Ingatestone and Fryerning, Rural Community Council for Essex (RCCE), 2013.

- Town and Country Planning (Development Management Procedure) (England) Order 2015.

- Proposals for new or improved bridleways, pedestrian and cycle routes connecting Ingatestone and Fryerning and within Ingatestone, Fryerning and Mill Green, will be supported.

Proposals that provide or contribute towards new or improved car parking provision within Ingatestone will be supported.



# ENVIRONMENT





## ENVIRONMENT VISION AND OBJECTIVES

- To maintain and protect the natural environment and green space within the parish.
- To enhance the biodiversity of the parish.
- To reduce carbon emissions within the parish in order to combat climate change.
- To ensure all residents living within the parish breathe clean air.

## CONTEXT

The parish has a strong rural character. The village of Ingatestone is surrounded by open and agricultural land which separates it from Fryerning to the north west and other nearby settlements of Mountnessing, Margaretting and Stock. Outside the villages of Ingatestone and Fryerning the parish consists of predominantly open countryside. Inside the village boundaries the largest areas of green infrastructure<sup>28</sup> and open space<sup>29</sup> are Fairfield Recreation Ground (Figure 15) and Seymour Field (Figure 16).

The parish contains areas of mature woodland at Mill Green, Fryerning Wood and College Wood and there are several small lakes primarily used for angling. Mill Green Common (Figure 17) is part of the ancient royal hunting forest known as Writtle Forest. Some parts of this area have changed little since the early medieval period.

There are 15 local wildlife sites (LWS) located throughout the parish<sup>30</sup>, consisting predominantly of woodland areas. The woodland and open fields (Figure 18) provide good habitats for fauna and flora. There are large tracts of agricultural land, predominantly arable farming, which are listed as Grade 2 and Grade 3 agricultural land. Fields are separated by hedgerows which in themselves provide valuable habitats.

### Protecting and maintaining the natural environment, open space and green infrastructure

The open countryside areas of the parish provide a variety of habitats for fauna and flora. Many species depend on the natural environment for food and shelter. Where human development impacts upon the ability of wildlife to survive we have a responsibility to current and future residents of the parish and beyond to protect our natural environment.

IFNP Environment Policy 6 aims to maintain and protect the natural environment from human impact, especially relating



Figure 15: Fairfield pond

to new developments within the countryside on the edge of existing settlements. This approach reflects views identified through the IFNP residents questionnaire undertaken in summer 2018, which identified that features which residents considered most important for the area included proximity to countryside, an attractive village environment and public open space.

Account should be taken of Natural England's desire 'to leave our environment protected and enhanced for the future' (Defra 2018a).

Through policies and proposed projects in the IFNP, the parish council is seeking to enhance the natural environment within the parish. Where possible and appropriate, new development proposals should seek opportunities to create wildlife corridors and improve access to the countryside for recreation. Development proposals which will have an impact on the natural environment will be required to clearly demonstrate the potential impacts of development, preferably through an ecological assessment.

Where development proposals are likely to impact upon the natural environment, open space or green infrastructure, they will be required to clearly demonstrate how the benefits arising from the development will outweigh the negative impacts. Such benefits could include access to the countryside for recreation, creation of wildlife corridors, overall long-term net biodiversity

## Footnotes

<sup>28</sup> Green infrastructure is a network of multifunctional green spaces in rural and urban areas, which supports natural ecological processes to deliver a range of environmental and quality of life benefits that are integral to successful sustainable communities.

<sup>29</sup> Open space relates to all spaces of public value, including land and areas of water such as rivers and lakes (also referred to as blue infrastructure), which offer opportunities for sport and recreation and provide visual amenity.

<sup>30</sup> [www.essexwtrecords.org.uk](http://www.essexwtrecords.org.uk)



Figure 16: Seymour Field. Copyright Forever Callie Ltd [www.forevercallie.com](http://www.forevercallie.com)

gains and the achievement of other objectives set out in this plan.

Where mitigation measures are required to support new development, the parish council may consider a 'like for like' replacement, relocation and/or compensation towards the loss of habitats where it can be demonstrated that such measures will result in a net biodiversity gain for the area and improvements to habitats in relation to quantity, quality and connectivity. Any compensatory habitat created should

be delivered as close as possible to the development site and should be ecologically functional in advance of any loss. Account should be taken by developers of the Recreational Disturbance Avoidance & Mitigation Strategy (RAMS) as this impacts the parish.

IFNP questionnaire results identified that local residents would prefer new development to be located on previously developed land to protect undeveloped countryside areas and local wildlife habitats.

Figure 17: Church Green



Figure 18: Fryerning open field





Figure 19: Solar panel

Public access is limited to Fairfield Recreation Ground and Seymour Field. It is imperative that these areas are maintained and where possible enhanced, not only for recreational and sporting activities as outlined, but also to provide habitats to local flora and fauna.

### Climate change

The parish will face environmental challenges over the next 30 years. The Climate Change Act 2008 first committed the UK to drastically reduce its carbon emissions by 2050. However, recent studies, including work undertaken by the United Nations International Panel on Climate Change (IPCC), suggest we need to decarbonise by 2030 to have a meaningful impact on the effect of climate change.

At the international level the Paris Agreement commits the UK to 'keeping global average temperatures 'well below' two degrees centigrade above pre-industrial levels'. As a result, Policy 6 seeks to encourage development proposals which mitigate against climate change and promote adaption. Climate change is a cross cutting theme, therefore sustainability and resilience is embedded throughout the IFNP.

Improving the energy efficiency of buildings within the parish will provide an important contribution towards reducing carbon emissions within the parish. While IFNP Housing Design Policy 2, seeks to encourage sustainable design features within new developments, this will only influence a small proportion of the total buildings in the parish. To reduce carbon emissions in the parish, it is therefore essential that we seek to encourage and support improvements to the energy efficiency of existing buildings within the parish.

Encouraging the use of sustainable modes of transport<sup>31</sup> will also support a reduction in carbon emissions within the parish. IFNP Transport Policy 5, presents policies and projects to encourage the use of sustainable modes of transport. In addition

to encouraging sustainable modes of transport, electric vehicles will also provide an opportunity to reduce carbon emissions and air pollution. The inclusion of electric vehicle charging points within new developments will therefore be supported and encouraged, or as a minimum infrastructure to support the provision of charging points in the future should be provided. This could include for example electric cabling adjacent to car parking spaces and sufficient space adjacent to the parking bay to provide a charging point.

To support the environment the parish council will seek opportunities to plant new trees within the parish and will encourage new developments to include new tree planting.

Ingatestone and Fryerning falls within a zone of influence where additional residential development may increase visitor numbers to sensitive coastal areas, potentially increasing disturbance to birds and their habitats. An Essex-wide strategy (called the Recreation disturbance Avoidance and Mitigation Strategy, or RAMS) has been prepared, identifying the potential for disturbance and the types of mitigation that might be needed. Requirements are set out in Policy NE02 of the adopted Brentwood Local Plan, and contributions will be secured from qualifying developments in the Plan area towards mitigation measures in accordance with the RAMS<sup>32</sup>.

### Extreme weather and flooding

It is predicted that climate change will result in more extreme weather events. With increased rainfall comes the increased risk of flooding. Longer heat waves may also affect water supplies.

In several locations in the parish roads flood after heavy rainfall and drains are often blocked. The main area of flooding is farmland adjacent to the River Wid.

New developments should promote water efficiency by incorporating rainfall harvesting technology. Tree planting will also be encouraged to improve water infiltration levels within new developments. Sustainable urban drainage systems should be included within new development proposals which include new houses.

There are two Critical Drainage Areas (CDA) within the Parish. Any development within the CDA's should be directed away from areas of existing flooding and where possible should seek to have a positive impact on existing areas of flood risk downstream of the development. Early engagement with Essex County Council as Lead Local Flood Authority (LLFA) and consideration of most up to date Surface Water Management Plan (SWMP) Action Plan is critical to ensure that existing and potential flood risk is properly managed.

Development should be designed to manage surface water at its source and water quality using variety of SuDS methods such as infiltration, interception, rainwater harvesting and greywater recycling, which include source control features such as permeable paving, water butts, rain gardens, green roofs and site control features such as swales, ponds and detention basin.

### Footnotes

<sup>31</sup> Sustainable modes of transport are transport modes which do not rely on the car, such as walking and cycling and public transport such as buses and trains.

<sup>32</sup> Essex Recreational disturbance Avoidance Strategy (RAMS), September 2020

## Renewable energy

Government has set a target to deliver 15% of UK energy consumption by renewable means by 2020. The costs of installing solar (Figure 19) and wind energy have fallen dramatically in recent years and therefore provides an opportunity for more renewable energy to be produced locally. The parish council will work with the local community through the establishment of a Community Energy Group to consider where and how renewable energy developments could be provided within the parish and to produce a Sustainable Energy Plan for the parish.

Development proposals in the Parish will also need to take account of the Government's net-zero carbon targets and standards, and the relevant recommendations of the Essex Climate Action Commission (ECAC) report 'Net Zero: Making Essex Carbon Neutral'

## Noise and air pollution

In recent years evidence has been produced demonstrating the serious health consequences of air pollution. BBC no longer monitors air pollution within the parish. Where no monitoring is taking place, it is unclear if there are any air quality issues which need to be addressed within the parish. This is an issue of concern for local residents, particularly due to the location of the Ingatestone Infant and Ingatestone Junior Schools close to the A12.

The parish council will consult with BBC to consider options for air quality monitoring within the parish of Ingatestone High Street and close to Ingatestone Infant School on Fryerning Lane. In the absence of any regular monitoring, all new major developments (10 dwellings or more<sup>33</sup>) in the parish will be required to demonstrate an understanding of the current air quality surrounding the development site and outline the potential wider air quality implications of the proposed development on the parish.



## POLICY 6: ENVIRONMENT

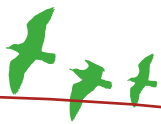
- A. Development proposals should protect and where possible enhance the natural environment. All development proposals should seek to deliver net biodiversity gain, in addition to protecting existing habitats and species. Any proposals which negatively affect, or have the potential to negatively affect, the natural environment should demonstrate that any negative impacts on biodiversity, including flora, fauna and wildlife habitats, will be adequately mitigated. Development proposals which may have an impact on wildlife habitats in the parish should be accompanied by an ecological assessment which will clearly demonstrate any potential impacts.
- B. Development proposals will be encouraged that seek to enhance the provision of and access to green infrastructure and open space in the parish by:
- Creating new areas of green infrastructure and open space.
  - Improve the connectivity between wildlife habitat areas and green infrastructure and open space through wildlife corridors and/or improvements to the Public Right of Way and cycle, bridleway and footpath networks.
  - Enhancing the visual characteristics and biodiversity of green infrastructure and open space in close proximity to new development.
- C. Development proposals which would result in the net loss of green infrastructure or areas of open space will only be supported where it can be demonstrated that:
- The benefits of the project outweigh any identified harm created by the loss
  - Overall the development results in a net biodiversity gain for the area and improvements to habitats in relation to quantity, quality and connectivity
  - Any compensatory wildlife habitat is created as close as possible to the development site and should be ecologically functional in advance of any loss.
- D. New development proposals should seek opportunities to reduce carbon emissions by:
- Encouraging the use of sustainable modes of transport within the design of developments through safe walking and cycling routes which provide connections to surrounding public transport and local services and facilities.
  - Encouraging home working by designing homes to be adaptable and ensuring good quality mobile phone and broadband connections
  - Seeing new tree planting within new development schemes in the parish, including proposals for long-term maintenance of newly planted trees.
  - Providing electric car charging points within new developments, or as a minimum ensuring essential infrastructure is in place to enable charging points to be provided in the future.
  - Incorporating sustainable design features which promote net zero carbon standards, energy efficiency, biodiversity gains, innovative low carbon technology, water efficiency, energy conservation and efficiency, renewable energy generation, flood resilience, sustainable waste and mineral management. Management, such as infiltration, interception, rainwater harvesting, and grey water recycling, which include source and water quality control features such as permeable paving, water butts, rain gardens, green roofs, and site control features such as swales, ponds, and detention basins.
- E. Development proposals should incorporate Sustainable Drainage Systems (SuDS) where appropriate to manage greenfield surface water runoff rates and to reduce the potential for flooding. Sustainable Drainage Systems should be designed to deliver multi-purpose space to enhance biodiversity net gain and ecosystems within new developments. SuDS proposals should be designed appropriately to manage surface water and water quality.

The frequent flooding of the River Wid should be addressed by Brentwood Borough Council and Chelmsford City Council jointly as an s106/CIL device.





# **WELLBEING, LEISURE AND COMMUNITY FACILITIES**



# WELLBEING, LEISURE AND COMMUNITY FACILITIES

## VISION AND OBJECTIVES

The following community facilities, leisure and wellbeing related objectives form part of the Vision Statement for the IFNP:

- Supporting measured, proportionate, timely and sustainable development to meet local requirements, particularly those of our younger people and older residents.
- Influence key 'age friendly' issues e.g. community safety, housing, planning, street lighting, green spaces, playing fields and parks, community centres, war memorials, seats and shelters, public toilets.

### Context

The consideration of wellbeing within the IFNP relates to local residents' quality of life and happiness, including both physical and mental wellbeing. Individual wellbeing can be significantly affected by the provision of accessible community services, facilities and leisure activities within the area. Physical and mental wellbeing can often be connected to the physical environment. The parish benefits from close proximity to the countryside for walking, riding and cycling through the network of public footpaths and bridleways and also the availability of open space and green infrastructure in the parish.

The following definitions are relevant to the purposes of this policy:

- Green infrastructure is a network of multifunctional green spaces in rural and urban areas, which supports natural ecological processes to deliver a range of environmental and quality of life benefits that are integral to successful sustainable communities.
- Open space relates to all spaces of public value, including land and areas of water such as rivers and lakes (also referred to as blue infrastructure), which offer opportunities for sport and recreation and provide vital amenity.
- Leisure and community facilities refers to publicly accessible halls, buildings, green infrastructure, open space, sports facilities, churches, groups and organisations and the library.

25.5% of the population of the parish is aged 65 or over<sup>33</sup>. This is a higher proportion of the population than the national average. Ongoing improvements to people's health and healthcare services will be likely to increase the population of older residents in the parish. The wellbeing and provision of services and facilities for older people is therefore an important consideration for the future of the parish.

The IFNP questionnaire identified that proximity to the countryside, the attractiveness of the village environment,

### Footnotes

<sup>33</sup> Rural Community Profile for Ingatestone and Fryerning, Rural Community Council for Essex (RCCE), 2013.



Figure 20: Fairfield Recreation Ground

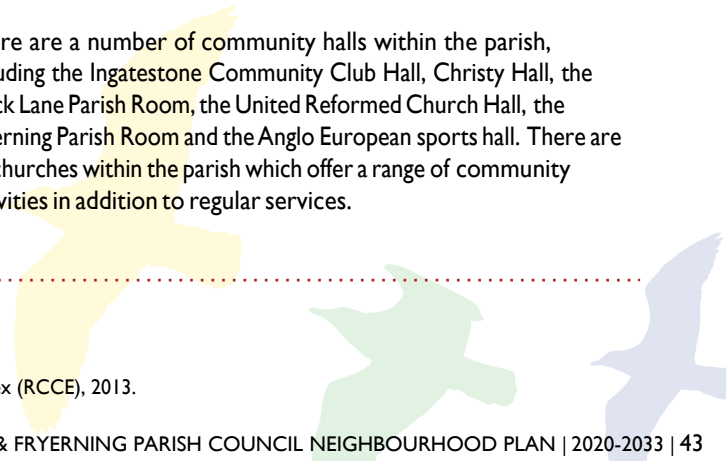
public open space and conservation areas within the parish are considered to be important and contribute to the quality of life of local residents. These are all features which could have an impact on the wellbeing of residents.

### Existing leisure and community facilities within the parish

Leisure and community facilities within the parish are listed within Table 3. There are a wide range of leisure activities within the villages which cater for all age groups, including playgroups, scouts, the Historical Society, Camera Club, the Women's Institute and the Ingatestone and Fryerning Horticultural Society who present an annual summer show on Seymour Field. These clubs and societies provide opportunities for social interaction, developing a community spirit and positively benefiting people's wellbeing. Additional community services and facilities are also available in the larger nearby towns of Brentwood and Chelmsford, both accessible from the Ingatestone by regular public transport services.

The three largest publicly accessible areas of open space in the parish are Fairfield Recreation Ground (Figure 20), Seymour Field and Mill Green Common, used for sports, walking, dog exercising and as a social meeting place. In May 2019 the Seymour Pavilion (Figure 21) was refurbished through Football Foundation funding to provide two changing rooms, an officials' changing room, community hall, kitchen, toilets and storage space.

There are a number of community halls within the parish, including the Ingatestone Community Club Hall, Christy Hall, the Stock Lane Parish Room, the United Reformed Church Hall, the Fryerning Parish Room and the Anglo European sports hall. There are six churches within the parish which offer a range of community activities in addition to regular services.







**Future provision of leisure and community facilities within the parish**

The BBC Playing Pitch Strategy<sup>34</sup> has assessed the quality of playing pitches within the parish and identified the following key conclusion:

- Ingatestone Bowls Club has a good standard of green and clubhouse facilities, however some improvements to an ancillary facility are required.
- Fairfield Recreation Ground is currently over capacity in relation to the use of cricket squares. There is currently no capacity for additional adult or junior cricket teams.
- Football pitch facilities at Seymour Field for both adult and youth are at capacity. However, there is currently no identified demand in the area for additional football pitches.

Recommended improvements to Fairfield Recreation Ground are:

- Resurfacing/ replacement of the existing non turf pitch and improvement of the grass wickets in order to increase the capacity of the site.
- Refurbish ancillary facilities to ensure that the site is fit for purpose.
- Improve signage or add CCTV to the site to reduce vandalism.

The parish council has been undertaking maintenance improvements to increase the capacity of football pitch facilities at Seymour Field. The parish council has identified a need for

Table 3: Leisure and community facilities

TYPE OF LEISURE AND COMMUNITY FACILITY	NAME	LOCATION	FACILITIES
Community facility	Ingatestone Library	Ingatestone village	Includes facilities for community groups, meetings and events.
Green infrastructure/ Open Space / Sports facility	Seymour Field	Ingatestone village	Playing fields and open space.
	Fairfield Recreation Ground	Ingatestone village	Cricket field used by 3 teams, pavilion and children’s play areas, hard court, climbing wall, youth shelter and skate park.
Open space	Mill Green Common	Mill Green	Common land.
Sports facility	Fishing lakes (Red House Lake, Oakwood Fisheries, Fryerning Fisheries)	Ingatestone village, Fryerning and Blackmore Road	Private fisheries.
Green infrastructure	Stock Lane Allotments Roman Road Allotments	Stock Lane, Ingatestone Roman Road	Allotments.
Sports facility	Ingatestone Bowls Club	Ingatestone village	Outdoor bowls.
Sports facility	Ingatestone and Fryerning Tennis Club	Ingatestone village	3 outdoor tennis clubs.

**Footnotes**

<sup>34</sup> Brentwood Borough Council Playing Pitch Strategy 2018-2033, 4global Consulting, 2018.

a new multi-use games area within Seymour Field, however funding has not yet been identified for this project.

While there are a number of halls within the parish which are available for community uses, the parish does not have a large village hall which provides a focal point for community activities. It is therefore important that groups are able to use existing facilities within the parish where appropriate for community activities. The parish council is therefore currently considering how use of the recently refurbished Seymour Pavilion and Ingatestone Library (Figure 22) can be maximised for community activities in the future. The parish council is also currently in discussions with ECC regarding the potential for increasing opening times at the library.

Wellbeing is also related to people's ability to safely access services and facilities, to participate in recreational walking and cycling on the local road network and the health of residents in relation to air and noise pollution associated with vehicle movements in the parish. These issues are considered further within the Transport section of the IFNP, where identified policy requirements and projects will provide wellbeing benefits as well as transport benefits for the parish.

The protection and enhancement of leisure and community facilities is vital in ensuring the future wellbeing of residents in the parish. IFNP Wellbeing, leisure and community facilities Policy 7 therefore seeks to protect existing facilities in the parish, while also encouraging development proposals which support the delivery of new and improved leisure and community facilities. Potential improvements to community facilities within the parish are listed in Table 4 below with indication of potential funding sources for each project including developer contributions negotiated through Section 106 agreement.

Table 4: Potential improvements to community facilities

FACILITY	PROJECT	STATUS/FUNDING
Ingatestone Bowls Club	Improvements to ancillary facilities.	Project not started. Costs to be determined. Funding required.
Fairfield Recreation Ground	Resurfacing/replacement of the existing non turf pitch and improvement of the grass wickets in order to increase the capacity of the site.	Not started. Costs to be determined. Funding required. Potential funding sources include Big Lottery Fund, Sport England, S106 development contributions.
Fairfield Recreation Ground and renovation of younger children's playground	Refurbish ancillary facilities to ensure that the site is fit for purpose.	Not started. Costs to be determined. Funding required. Potential funding sources include Big Lottery Fund, Sport England, S106 development contributions.
Fairfield Recreation Ground	Improve signage or add CCTV to the site to reduce vandalism.	Not started. Costs to be determined. Funding required. Potential funding sources include IFPC, BBC, community funding.
Seymour Field	New Outdoor gym facility.	Not started. Costs to be determined. Funding required. Potential funding sources include Big Lottery Fund, Sport England, S106 development contributions.

## POLICY 7: WELLBEING, LEISURE AND COMMUNITY FACILITIES

Development proposals should contribute proportionately towards the provision of leisure and community facilities within the parish which will meet the needs of the future residents of the development. Development proposals which address, or contribute towards, needs for new or improved leisure and community facilities in the parish will be supported.

Development proposals which would result in the net loss of existing community facilities or public open space will only be supported where it can be demonstrated that:

- The benefits of the project outweigh any identified harm created by the loss.

- The facility is no longer viable or in active use and has no prospect of being brought back into use.

Relevant evidence base documents:

- Brentwood Borough Council Sport, Leisure and Open Space Assessment, Ploszajski Lynch Consulting Ltd, August 2016.
- Brentwood Borough Council Playing Pitch Strategy 2018-2033, 4global Consulting, 2018.
- Rural Community Profile for Ingatestone and Fryerning, Rural Community Council for Essex (RCCE), 2013.
- Brentwood Built Facilities Strategy and Brentwood Leisure Strategy



Figure 22: Ingatestone Library



Figure 24: Ingatestone Bowling Club

Any proposals which would result in the loss of a community facility will be required to provide evidence that the facility is no longer viable, or that the facility is no longer in active use and has no prospect of being brought back into use. This should include reasonable and appropriate marketing of the site over a sustained period of time (a minimum of 12 months) and evidence of the level of interest in the site during the marketing period.

Figure 23: Ingatestone and Fryerning Community Association



Figure 25: Ingatestone Allotment Association



Figure 26: Ingatestone Tennis Club





## Monitoring and Review

The Parish Council will monitor the effectiveness of the policies in this Plan to ensure that they contribute to achieving the Plan's objectives. However, there is likely to be a necessity to formally review the Plan in due course, particularly following future reviews of the BLP and any relevant changes in national policy.

It will be the role of the Parish Council, working with Brentwood Borough Council, to review the Neighbourhood Plan at the appropriate time to ensure that its policies take into account national and local policy, are responsive to climate and other environmental changes and are meeting the vision for the future of Ingatestone and Fryerning.

## REFERENCES

- [1] Unless specified otherwise, all statistics are from 2011 census data.
- [2] A summary of the results of the IFNP Residents' Questionnaire is available in the Neighbourhood Plan evidence base on the parish council website [www.ingatestone-fryerningpc.gov.uk](http://www.ingatestone-fryerningpc.gov.uk)
- [3] Station Lane Ingatestone Conservation Area Appraisal and Management Plan, ECC, 2008.
- [4] Rural Community Profile for Ingatestone and Fryerning, Rural Community Council for Essex (RCCE), 2013.
- [5] Unless specified otherwise, all statistics are from 2011 census data.
- [6] An elementary occupation consists of simple and routine tasks, such as cleaners, agricultural labourers, food preparation assistants and refuse workers.
- [7] Brentwood Business Partnership is a partnership between Brentwood businesses, local business organisations and Brentwood Borough Council. The Partnership seeks to raise awareness of Brentwood as a thriving place for businesses, visitors and residents; increase footfall and encourage local spend to grow the local economy; support retailers, businesses, tourism and the night-time economy; and sponsor events and projects to attract more business and improve the public realm. Further information is available from: <http://www.discoverbrentwood.co.uk/Business/brentwood-business-partnership.asp>
- [8] Rural Community Profile for Ingatestone and Fryerning, Rural Community Council for Essex (RCCE), 2013
- [9] Certain uses do not fall within any use class and are considered 'sui generis'. Such uses include: betting offices, shops, pay day loan shops, theatres, larger houses in multiple occupation, hostels providing no significant element of care, scrap yards. Petrol filling stations and shops selling or displaying motor vehicles, retail warehouse clubs, nightclubs, launderettes, taxi businesses and casinos.
- [10] Map from the Brentwood Local Plan, pre-submission version, February 2019.
- [11] Based on 2011 Census data.
- [12] Rural Community Profile for Ingatestone and Fryerning, Rural Community Council for Essex (RCCE), 2013.
- [13] Brentwood Parking Strategy, Strategic Options Development Report, JMP Consultants Ltd, 2016.
- [14] Essex County Council Parking Standards – Design and Good Practice (2009), adopted by Brentwood Borough Council as a Supplementary Planning Document (SPD) in 2011
- [15] Major developments as defined within the Town and Country Planning (Development Management Procedure) (England) Order 2015.
- [16] Essex County Council Parking Standards – Design and Good Practice (2009), adopted by Brentwood Borough Council as a Supplementary Planning Document (SPD) in 2011
- [17] Major developments as defined within the Town and Country Planning (Development Management Procedure) (England) Order 2015.
- [18] Green infrastructure is a network of multifunctional green spaces in rural and urban areas, which supports natural ecological processes to deliver a range of environmental and quality of life benefits that are integral to successful sustainable communities.
- [19] Open space relates to all spaces of public value, including land and areas of water such as rivers and lakes (also referred to as blue infrastructure), which offer opportunities for sport and recreation and provide visual amenity.
- [20] [www.essexwtrecords.org.uk](http://www.essexwtrecords.org.uk)
- [21] Sustainable modes of transport are transport modes which do not rely on the car, such as walking and cycling and public transport such as buses and trains.
- [22] Major developments as defined within the Town and Country Planning (Development Management Procedure) (England) Order 2015.
- [23] Rural Community Profile for Ingatestone and Fryerning, Rural Community Council for Essex (RCCE), 2013.
- [24] Brentwood Borough Council Playing Pitch Strategy 2018-2033, 4global Consulting, 2018.





## GLOSSARY

ACRONYM	SUBJECT	EXPLANATION
	Air Quality	The Ingatestone and Fryerning Neighbourhood Plan has included policies that seek to ensure that new developments do not result in an increase in traffic and congestion which could have a detrimental impact on air quality in the parish.
	Affordable Housing	Brentwood Borough Council has proposed an affordable housing requirement of 35% on proposed developments of 11 or more (net) units or sites of 10 or less units which have a combined gross internal floor space in excess of 1,000 square metres.
BBP	Brentwood Business Partnership	A partnership between Brentwood businesses, local businesses organisations and Brentwood Borough Council.
BLP	Brentwood Local Plan	The National Planning Policy Framework requires local planning authorities to produce a Local Plan for their area. Brentwood Borough Council's BLP was submitted to the Planning Inspectorate for examination on behalf of the Secretary of State (Regulation 22) in March 2020.
	Brentwood Parking standards and Strategy	BBC adopted the Parking Standards Design and Good Practice 2009 as a Supplementary Planning Document (SPD) as of 10 March 2011. Strategic options development report, prepared by JMP Consultants Ltd 2016.
	Brentwood Borough Council Sport, Leisure and Open Space Assessment	A policy document prepared by Ploszajski Lynch Consulting Ltd in August 2016 to support the LDP recommendations.
	Brentwood Borough Council Playing Pitch Strategy 2018-33	A policy document prepared by 4global Consulting in 2018 to support the LDP recommendations.
	Brentwood Replacement Local Plan adopted 2005	The Local Plan sets a framework for future growth in the area, identifying the level of need and locations for new housing, employment and retail development.
	Building Research Establishment Green Guide to Specification	Describes the selection of materials within new developments to ensure the use of the most sustainable available materials.
	Conservation Area	There are three, Fryerning - established in 1991, Ingatestone High Street - established in 1969 and Station Lane established in 1981 and extended to cover Tor Bryan.
	Consultation Plan	A Consultation Plan accompanying the Ingatestone and Fryerning Neighbourhood Plan is required by the Localism Act. The Consultation Plan must set out what consultation was undertaken and how this informed the Neighbourhood Plan.

ACRONYM	SUBJECT	EXPLANATION
	Design Brief	Design briefs are required for all allocated residential sites in the Ingatestone and Fryerning Neighbourhood Plan. Design briefs are documents that provide clear guidance for the detailed design of new development.
ECC	Essex County Council (ECC)	<p>ECC is the Waste Planning Authority for the Plan area and is responsible for preparing planning policies and assessing applications for waste management development. It is also the Mineral Planning Authority for the Plan area and is responsible for preparing planning policies and assessing applications for mineral development.</p> <p>ECC is the Highway and Transport Authority (including responsibility for the delivery of the Essex Local Transport Plan), the Local Education Authority, including Early Years and Childcare (EYYC), Special Education Needs and Disabilities (SEND), and Post 16 education, the Local Flood Authority (LLFA) and the lead advisor on Public Health and adult social care (in relation to the securing the right housing mix which takes account of the housing needs of older people and adults with disabilities).</p>
	Essex Design Guide	Published in 2018 it gives architectural details for new developments and other important elements such as older peoples' housing, climate change and energy efficiency.
	Evidence Base	The researched, documented, analysed and verified basis for preparing the Ingatestone and Fryerning Neighbourhood Plan. It consists of many documents produced over a period of years, many of which have been produced by Brentwood Borough Council as part of the process of developing their Local Development Plan.
	George Sherrin	A Victorian architect who designed and built a number of properties in the Station Lane Conservation area.
	Greater Anglia and Railway Heritage Trust	Working with the parish council to develop the Ingatestone Museum in a disused railway building.
	Green Corridors	Green spaces that provide avenues for wildlife movement, often along streams, rivers, hedgerows or other natural features. They connect green spaces together and often provide pleasant walks for the public away from main roads.
	Green Infrastructure	Green infrastructure is a network of multifunctional green spaces in rural and urban areas, which supports natural ecological processes to deliver a range of environmental and quality of life benefits that are integral to successful sustainable communities.
	Habitats Regulations	The European Union Habitats Directive aims to protect the wild plants, animals and habitats that make up our diverse natural environment. The directive created a network of protected areas around the European Union of national and international importance. They are called Natura 2000 sites. If development is likely to affect a Natura 2000 site, an assessment under the Habitats Regulations is required.
HAPPI	Housing our Ageing Population: Panel for Innovation	Since 2009 a government panel has been considering issues associated with housing for older people, called Housing our Ageing Population: Panel for Innovation.
	Listed Buildings	Buildings and structures which are listed by the Department for Culture, Media and Sport as being of special architectural and historic interest and whose protection and maintenance are the subject of special legislation. Listed building consent is required before any works are carried out on a listed building.

ACRONYM	SUBJECT	EXPLANATION
	Local Planning Authority	The Local Planning Authority is Brentwood Borough Council.
	Localism Act	An Act of Parliament that became law in April 2012. The Act introduces a new right for local people to draw up Neighbourhood Development Plans for their local area.
	Metropolitan Green Belt	The Metropolitan Green Belt is a statutory green belt around London, England. It comprises parts of Greater London and the six adjoining 'home counties', parts of two of the three districts of the small county of Bedfordshire and a small area in Copthorne, Sussex. It was created to check the unrestricted sprawl of large built-up areas, to prevent neighbouring towns from merging into one another, to assist in safeguarding the countryside from encroachment and to preserve the setting and special character of historic towns.
	National Design Guide	Issued by the Ministry of Housing, Communities and Local Government 2019. The long-standing fundamental principles for good design are that it is: fit for purpose, durable and brings delight.
NPPF	National Planning Policy Framework	The National Planning Policy Framework was published by the government in March 2012 and revised in 2019 and 2021. It sets out the government's planning policies for England and how these are expected to be applied.
NPAC	Neighbourhood Plan Advisory Committee	Committee of the Ingatestone and Fryerning Parish Council comprising parish councillors and residents convened to produce the Neighbourhood Plan.
	Neighbourhood Plan	The full title in the Localism Act is 'Neighbourhood Development Plan' but this is commonly shortened to 'Neighbourhood Plan'. It is a plan document for defined area subject to examination in public and approval by referendum. It will be used on approval in the determination of applications.
	Office for National Statistics	The 2011 Census provided data for the production of the Neighbourhood Plan.
	Parking Standards	Essex County Council Parking Standards are a Supplementary Planning Document produced in 2011 and continues to expect new development to comply with these design and provision standards.
	Passivhaus Trust	Passivhaus standards seek to significantly reduce energy consumption for the heating and cooling of buildings.
PPG	Planning Practice Guidance	The PPG is an online portal which provides guidance on implementing aims and objectives of the NPPF. The PPG provides specific guidance on a range of planning related topics.
	Referendum	A general vote by the electorate on a single political question that has been referred to them for a direct decision. In the case of the Ingatestone and Fryerning Neighbourhood Plan, the referendum will decide whether or not to adopt the Plan.
RCCE	Rural Community Profile for I&F	Report prepared by the Rural Community Council for Essex on the parish based on the 2011 census data.
	Site R21	Site allocated for employment purposes in the BBC's LDP. The site is adjacent to the A12 and slip road in Ingatestone.

ACRONYM	SUBJECT	EXPLANATION
	Site R22	This is the land allocated for housing development in the Local Development Plan. The site is located at the southern periphery of the village where it effectively forms a gateway site when approached from both Brentwood and Billericay directions.
RAMS	Retraction disturbance Avoidance Mitigation Strategy	Ingatestone and Fryerning falls within a zone of influence where additional residential development may increase visitor numbers to sensitive coastal areas, potentially increasing disturbance to birds and their habitats. An Essex-wide strategy (called the Recreation disturbance Avoidance and Mitigation Strategy, or RAMS) has been prepared, identifying the potential for disturbance and the types of mitigation that might be needed. Requirements are set out in Policy NE02 of the adopted BLP, and contributions will be secured from qualifying developments in the Plan area towards mitigation measures in accordance with the RAMS. For further details please view the RAMS Strategy: <a href="https://birdaware.org/essex/our-strategy/">https://birdaware.org/essex/our-strategy/</a>
SEA	Strategic Environment Assessment	Assessments made compulsory by a European Directive (the SEA Directive). To be implemented in planning through Sustainability Appraisal of Development Plan Documents and Neighbourhood Plans where required.
	Sustainable Transport	The Climate Change Act commits the UK to reducing CO2 emissions. Sustainable modes of transport are transport modes which do not rely on the car such as walking and cycling and public transport such as buses and trains.
	Sui generis	Unique or different.
	Sustainable Urban Drainage Systems	A drainage system that controls the rate and quantity of run-off surface water from developments.
	Town and Country Planning Act 1990	This is the legislation that the Neighbourhood Plan must comply with to be 'made'.
	Vision Statement	Vision for the future of the parish 2020-2033.
	Windfall Sites	Sites not allocated for development in the Ingatestone and Fryerning Neighbourhood Plan that unexpectedly comes forward for development.



## APPENDIX I

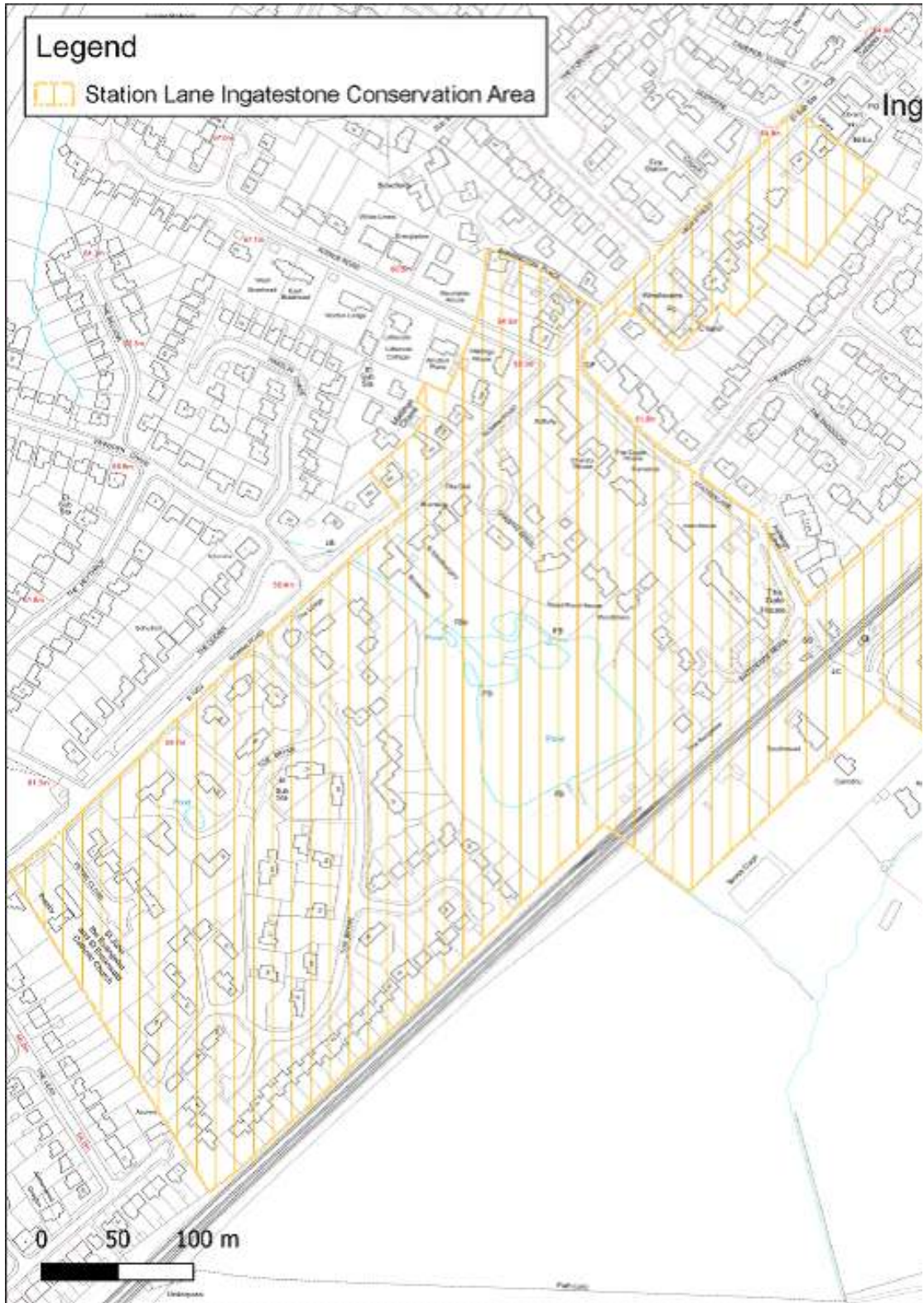
The following documents have been used to help produce the Ingatestone and Fryerning Neighbourhood Plan. Those highlighted in **Taupe** are available to download from Ingatestone and Fryerning Parish Council's website ([ingatestone-fryerningpc.gov.uk](http://ingatestone-fryerningpc.gov.uk)). The remainder are available to download from the relevant websites.

The Neighbourhood Plan Advisory Committee also produced discussion papers during the evidence gathering process, which influenced the policies produced.

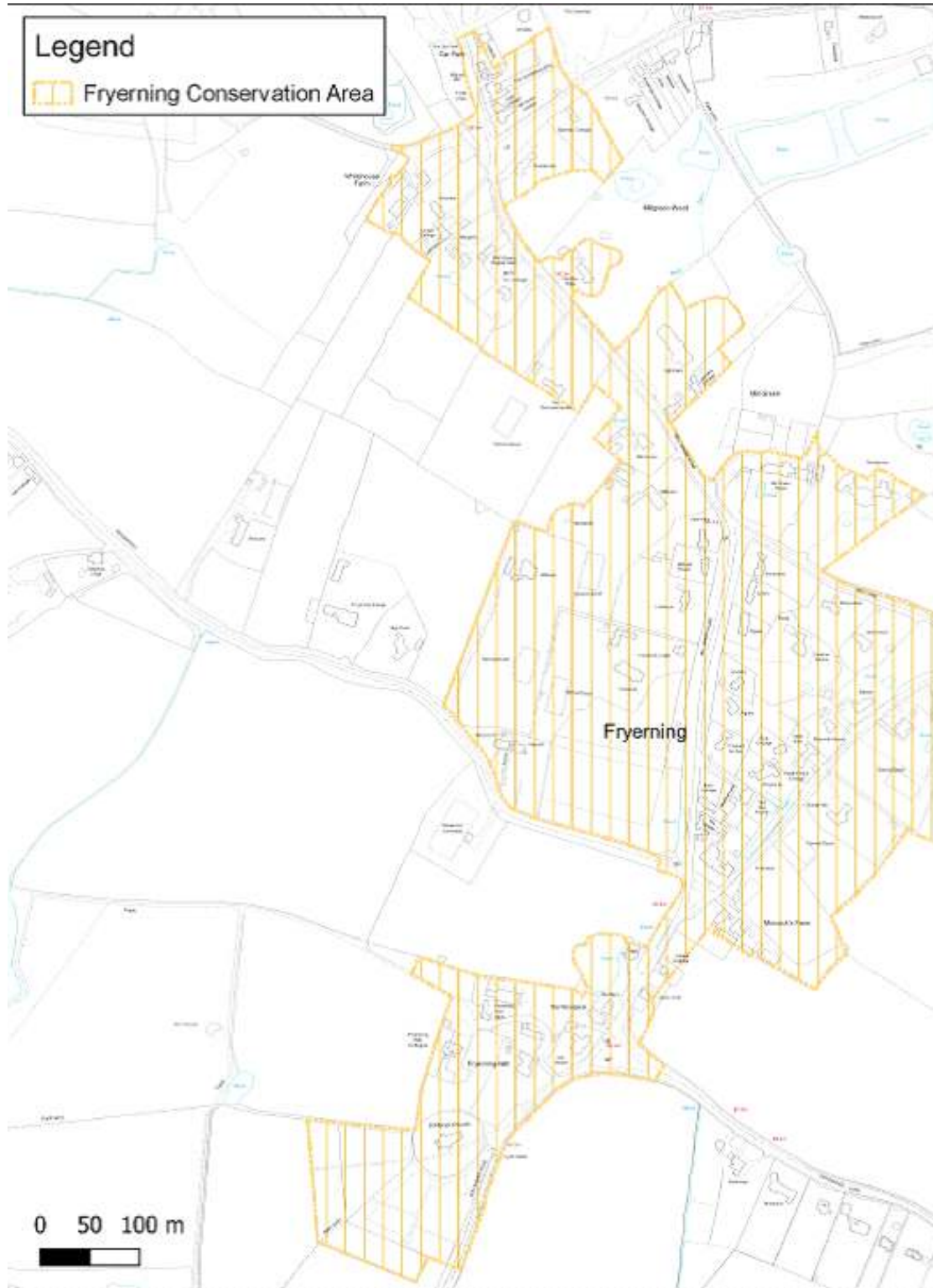
An early decision was taken to adopt the policies within the Brentwood Borough Council Local Development Plan. These are listed under that heading at [brentwood.gov.uk](http://brentwood.gov.uk).

1. Brentwood Borough Council Local Development Plan submitted under Regulation 22 in March 2020.
2. Parking Standards: Design and Good Practice 2009, adopted as a Supplementary Planning Document (SPD) 10 March 2011.
3. Brentwood Parking Strategy. JMP Consultants Ltd 2016.
4. Brentwood Borough Council Playing Pitch Strategy 2018-2033. 4global Consulting 2018.
5. **Brentwood Borough Council Sport, Leisure and Open Space Assessment. Ploszajski Lynch Consulting Ltd. August 2016.**
6. Brentwood Borough Council - Strategic Housing Market Assessment Summary. Peter Brett Associates, September 2017.
7. **Business Questionnaire Analysis. RCCE 2019.**
8. Census 2011. Office for National Statistics.
9. Climate Change Act.
10. **Community Engagement Strategy 2017.**
11. **Conservation Area Appraisals – Station Lane, Fryerning, High Street. Tor Bryan Estate - statement of the enlargement of the Station Lane Appraisal 2011.**
12. Essex County Council Rights of Way Improvement Plan 2009.
13. Essex Design Guide 2018.
14. Essex Green Infrastructure Strategy 2020.
15. **Household Questionnaire Analysis, RCCE February 2019.**
16. **Ingatestone and Fryerning Village Design Statement 2005.**
17. Localism Act 2012.
18. National Planning Policy Framework.
19. **Rural Community profile for Ingatestone and Fryerning. RCCE.**
20. Strategic Environment Assessment/Habitats Regulation Assessment (European Directive - the SEA Directive).
21. Town and Country Planning (Development Management Procedure) (England) Order 2015.
22. **Windfall Sites in Ingatestone and Fryerning 2014-19.**





APPENDIX 4: FRYERNING CONSERVATION AREA





**Press Release**

**Ingatstone & Fryerning Neighbourhood Plan Update**

Date: 23 June 2022

The Ingatstone & Fryerning Neighbourhood Plan was formally submitted to Brentwood Borough Council in November 2021. Since then, the neighbourhood plan was consulted on between December 2021 and March 2022 and submitted to an Independent Planning Inspector for examination.

The neighbourhood plan sets out additional policy requirements for any development proposal within the Parish.

On 16 June 2022, Brentwood Borough Council and Ingatstone & Fryerning Parish Council were notified that the Ingatstone & Fryerning Neighbourhood Plan had been approved to proceed to the referendum stage provided the required modifications were made.

All residents who reside within the Ingatstone & Fryerning Parish and are currently registered to vote will be receiving a polling card to vote on whether the neighbourhood plan should be adopted. This process is referred to as a referendum.

The referendum will commence on 30<sup>th</sup> June 2022 and polling stations open on 4<sup>th</sup> August 2022. Residents will be able to see more information on their poll cards.

Details about the neighbourhood plan can be viewed on both the Parish Council's and Brentwood Borough Council's websites via the links provided below.

Ingatstone & Fryerning Parish Council: [www.ingatstone-fryerningpc.gov.uk/](http://www.ingatstone-fryerningpc.gov.uk/)

Brentwood Borough Council: [www.brentwood.gov.uk/-/ingatstone-and-fryerning-np](http://www.brentwood.gov.uk/-/ingatstone-and-fryerning-np)

A copy of the Ingatstone & Fryerning Neighbourhood Plan can also be viewed at the following locations:

- Brentwood Borough Council Offices - Town Hall, Ingrave Road, Essex, CM15 8AY
- Ingatstone Library - High Street, Ingatstone CM4 9EU
- Ingatstone & Fryerning Parish Council Offices - 2, 4 The Limes, Ingatstone CM4 0BE

For further information or advice please contact the Policy Team by email on [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk) or by telephone on 01277 312500

**ENDS**

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<b>Committee(s):</b> Policy, Resources & Economic Development Committee	<b>Date:</b> 13 July 2022
<b>Subject:</b> Brentwood Local Plan Timetable (Local Development Scheme 2022-2025)	<b>Wards Affected:</b> All
<b>Report of:</b> Phil Drane, Corporate Director (Planning and Economy)	<b>Public</b>
<b>Report Author/s:</b> Name: Jonathan Quilter, Corporate Manager (Strategic Planning) Telephone: 01277 312500 E-mail: jonathan.quilter@brentwood.gov.uk	<b>For Decision</b>

## Summary

As part of the plan-making process a revised Local Development Scheme (LDS) (local plan timetable) has been prepared. This provides an update to the currently published version, approved in September 2019.

The timetable requires updating to reflect the review and update required to the Brentwood Local Plan 2016-2033 under Policy MG06. This sets out the need to prepare a revised local plan to accommodate objectively assessed housing needs and submit to the Secretary of State for independent examination within 28 months of adoption, which is July 2024. An update to the timetable is also required for the preparation of Community Infrastructure Levy (CIL) and Supplementary Planning Documents (SPDs).

## Recommendation(s)

**Members are asked to:**

- R1. Approve the Brentwood Local Development Scheme 2022-2025, as set out in Appendix A.**

## Main Report

### **Introduction and Background**

1. The Planning and Compulsory Purchase Act 2004 requires the council to prepare a Local Development Scheme (LDS) and keep it up to date. The main purpose of the LDS is to set out the rolling programme for the preparation of planning documents that will form Brentwood Borough Council's Development Plan and planning guidance. It identifies the key stages and timescales for the preparation of planning documents. This will provide the public and other

relevant stakeholders with information on what documents are being produced and the predicted timescales involved.

2. The council's most recent LDS timetable was approved in September 2019 (Item 168, Policy, Resources and Economic Development Committee). Since then the local plan has been submitted, examined and adopted. A review of the plan is underway and so a new timetable needs to be approved for this work.
3. The proposed updated timetable covers the period 2022-2025 (Appendix A).

### **Issue, Options and Analysis of Options**

4. Policy MG06 of the Brentwood Local Plan 2016-2033 commits the council to immediately begin a partial review and update of the plan to account for longer-term growth needs towards the end of the plan period and beyond. To define what partial means, a scope will need to be set to identify what parts of the plan are to be updated. This has been partly confirmed by the wording of Policy MG06 in terms of identifying sites to meet housing needs and identifying necessary highways and transport infrastructure to support this growth. However, it could also include a review of policies according to potential changes to the planning system and on swiftly evolving themes, such as green/environmental needs and ambitions, for example. This would be similar to what some other local planning authorities have included in recent local plan reviews.
5. The timeframes for undertaking this update are specified in Policy MG06, which requires work to commence immediately upon the adoption of the plan with submission of the update for examination within 28 months. This means that submission of the update should take place by 31 July 2024. This is alongside progressing the adoption of Community Infrastructure Fund (CIL) and Supplementary Planning Documents (SPDs).
6. It is important to keep the timetable up-to-date to provide accurate information to stakeholders using the document as well as meeting legislative requirements. The previous version of the LDS was published in September 2019. Since then, the local plan has been submitted and undergone examination, resulting in a conclusion of soundness. At the Extraordinary Council meeting on the 23 March 2022, the Brentwood Local Plan 2016-2033 was adopted (Item 373). This also included approval of Recommendation 4, which stipulated that the Local Development Scheme be revised and presented to a future meeting of the Policy, Resources and Economic Development Committee (see Item 373, Recommendation 4). This was to reflect the preparation of the local plan review, CIL and SPDs.

7. The LDS is split into a number of different sections. The first section sets out the current national and local planning policy context relevant to Brentwood borough. The second part of the document provides the timetable for the preparation of development plan documents, CIL and SPDs. The final sections of the document provide information regarding monitoring and reviewing and an analysis of the risks and contingencies involved.
8. An alternative option would be not to approve the updated LDS and continue to use the version published in September 2019, which is now out-of-date. However, this would result in stakeholders being less well informed on changes to the Development Plan, CIL, SPDs and other relevant information.

### **Reasons for Recommendation**

9. It is necessary to have an up-to-date local plan timetable. Delivery of the plan against the published timescales is monitored by the Department for Levelling Up, Housing and Communities. The revised Local Development Scheme sets out the timetable for preparation of the Local Plan Review, as well as supporting documents such as Community Infrastructure Levy and Supplementary Planning Documents.

### **Consultation**

10. Public consultation on the LDS is not specifically required by the Regulations. Each document highlighted in the LDS will be subject to specific public consultation in line with the statutory regulations at the appropriate time.

### **References to Corporate Plan**

11. The Local Development Scheme sets out the timetable for the production of the local plan, which is a delivery vehicle for several the council's Corporate Strategy objectives. The plan's policies contribute towards key priorities to grow the economy, protect the environment, develop communities, improve housing and delivering an effective and efficient council.
12. Linked to these key priorities are the council's underpinning strategies across service areas. Many of these have or are being prepared alongside the local plan, such as the Economic Development Strategy, Environment Strategy, Corporate Asset Strategy, Leisure Strategy, Housing Strategy and Parking Strategy. New strategies or future reviews will need to consider the local plan's strategic objectives and policies.
13. CIL provides a source of funding for the council and its partners to deliver infrastructure projects in the borough. Funds would be secured from development in an agreed and transparent manner. This directly contributes

towards the corporate priority to grow the economy, and objectives to support and promote major infrastructure improvements.

## **Implications**

### **Financial Implications**

**Name/Title: Jacqueline Van Mellaerts, Corporate Director (Finance & Resources) and Section 151 Officer**

**Tel/Email: 01277 312500/jacqueline.vanmellaerts@brentwood.gov.uk**

14. The timetables set out in the Local Development Scheme 2022-2025 are considered to be realistic and achievable within existing agreed budgets. Human Resource requirements will continue to be monitored to ensure that appropriate required support can be secured when needed to avoid timetable slippage.

### **Legal Implications**

**Name & Title: Amanda Julian, Corporate Director (Law & Governance) and Monitoring Officer**

**Tel & Email: 01277 312500/amanda.julian@brentwood.gov.uk**

15. The Planning and Compulsory Purchase Act 2004 requires the council to prepare a Local Development Scheme and keep it up to date. Accordingly the recommendations set out within this report ensure that the council is meeting its statutory obligations.
16. Furthermore, compliance with the Local Development Scheme is taken into account when development plan documents are examined by the Planning Inspectorate as appointed by the government. Therefore, it is important that the council publishes and maintains these documents to demonstrate that development plan documents are legally compliant.

### **Economic Implications**

**Name/Title: Phil Drane, Corporate Director (Planning and Economy)**

**Tel/Email: 01277 312500/philip.drane@brentwood.gov.uk**

17. There are no specific economic implications arising from the publication of an updated Local Development Scheme. However, the documents outlined within the timetable for preparation will identify future development in the borough and how this is managed, which will contribute towards economic growth.

## **Equality and Diversity Implications**

**Name/Title: Kim Anderson, Corporate Manager (Communities, Leisure & Health)**  
**Tel/Email: 01277 312500/kim.anderson@brentwood.gov.uk**

18. Section 149 of the Equality Act 2010 creates the public sector equality duty which requires that when the Council makes decisions it must have regard to the need to:
  - a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act
  - b) Advance equality of opportunity between people who share a protected characteristic and those who do not
  - c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.
  
19. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for (b) or (c) although it is relevant for (a)
  
20. An Equality Impact Assessment was prepared for the Brentwood Local Plan 2016-2033 (Equalities Impact Assessment, February 2022). This will need to be updated as work on the Local Plan Review progresses.

**Other Implications** (where significant) – i.e. Health and Safety, Asset Management, Risk Management, Section 17 – Crime & Disorder, Sustainability, ICT.

None

## **Background Papers**

- Item 373, Extraordinary Council, 23 March 2022, Brentwood Local Plan 2016-2033: Adoption
- Item 168, Policy, Resources and Economic Development Committee, 19 September 2019, Local Development Plan Update

## **Appendices to this report**

- Appendix A: Brentwood Local Development Scheme 2022-2025 (July 2022)

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# **Brentwood Local Plan Timetable**

## **Local Development Scheme 2022 – 2025**

**July 2022**



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## **1. Introduction**

- 1.1 The Planning and Compulsory Purchase Act 2004 requires that Brentwood Borough Council prepare a Local Development Scheme (LDS), or local plan timetable. This sets out the rolling programme for preparation of planning documents that will form Brentwood's Local Development Plan. It also identifies the key stages in the preparation of the council's Local Development Plan Documents. This LDS covers the period 2022 to 2025.
- 1.2 The Brentwood Local Development Scheme is a project management document, which informs the public and stakeholders of the planning documents that the council will produce and the timescale for their production.

## 2. Planning Context

### National Planning Policy

- 2.1 [The National Planning Policy Framework \(July 2021\)](#) sets out the government's planning policies for England and how these are expected to be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. Regarding plan-making, paragraph 15 of the framework describes how "the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings."

### County Planning Policy

- 2.2 Essex County Council is the authority responsible for production of minerals and waste local plans, which form part of the Development Plan in Brentwood borough. At present the adopted plans are:
- a) [The Essex Minerals Local Plan \(2014\)](#) (currently under review)
  - b) [The Essex and Southend-on-Sea Waste Local Plan \(2017\)](#)

### Local Planning Policy

- 2.3 The Development Plan for Brentwood comprises the [Brentwood Local Plan 2016-2033](#), which was adopted in March 2022. Policy MG06: Local Plan Review and Update, commits the council to an early review of the plan to address housing needs. This requires a local plan review to be submitted for examination within 28 months of adoption, which would be by July 2024.

### Supplementary Planning Documents and Guidance

- 2.4 Supplementary Planning Documents (SPDs) are non-statutory documents that give further guidance on the policies and proposals set out in development plan documents. Whilst SPDs must be in conformity with the development plan and subject to public consultation, they do not have to undergo examination.
- 2.5 The council has adopted and/or endorsed several guidance documents, including:
- a) Essex Coast Recreational Avoidance Mitigation Strategy SPD (2020)
  - b) Brentwood Town Centre Design Guide SPD (2019)

- c) Developers' Guide to Infrastructure Contributions (Revised Edition 2016)
- d) Sustainable Drainage Systems Design Guide (2015)
- e) Vehicle Parking Standards (2011)
- f) Shopfront Guidance for Brentwood Town Centre SPD (2010)
- g) Urban Place Supplement SPD (2007)

### **Statement of Community Involvement**

- 2.6 The council's [Statement of Community Involvement](#) was adopted in December 2018. The SCI outlines how the council will involve the local community and other stakeholders in the preparation of its planning policy documents (plan-making) and consideration of planning applications (decision-making).
- 2.7 The council has subsequently prepared an addendum to its adopted SCI, relating to the preparation of the South Essex Joint Strategic Plan (JSP).

### 3. Brentwood Local Plan Review

- 3.1 The Brentwood Local Plan 2016-2033 commits to a partial review and update of the plan in Policy MG06 with the objective of meeting the full Objectively Assessed Housing Needs. The review commenced immediately upon adoption of the plan with submission of the review for examination required within 28 months from adoption by 31 July 2024.
- 3.2 The timetable for the review and update is set out below in Table 1 and Appendix A. These will be updated with further detailed timescales as the review progresses and relevant milestones are met or require amending. The table provides timescale quarters for each year as follows:
- a) Quarter 1 = January / February / March
  - b) Quarter 2 = April / May / June
  - c) Quarter 3 = July / August / September
  - d) Quarter 4 = October / November / December

**Table 1: Local Plan Review Timescales**

Stage	Estimated timescale
New/revised evidence base procured/produced/revised	Quarter 2 2022 and ongoing thereafter
Duty to Co-operate engagement	Quarter 2 2022 and ongoing thereafter
Formal Regulation 18 consultation (Preferred Options)	Quarter 3 2023 (six week consultation)
Review comments and revise Plan	Quarter 3 / Quarter 4 2023
Submission Local Plan consultation (Regulation 19)	Quarter 1 2024 (six week consultation)
Review comments and revise plan	Quarter 2 2024
Submission of Local Plan and representations to Secretary of State (Regulations 20, 22 and 35)	Quarter 3 2024
Independent Examination (Regulation 20)	Quarter 4 2024
Inspector's Report and adoption of Local Plan (Regulations 20 and 35)	Quarter 1 / Quarter 2 2025

#### 4. Community Infrastructure Levy (CIL)

- 4.1 The CIL is a planning charge on new developments used by local authorities to fund and deliver infrastructure needed to support new development. CIL is charged on a £ per square metre basis on the gross internal area of new development.
- 4.2 Following adoption of the local plan in March 2022 the council is committed to the preparation of CIL for the borough. The timetable for this is set out below in Table 2 and Appendix A.

**Table 2: Community Infrastructure Levy (CIL) Timescales**

Stage	Estimated timescale
Publish draft schedule and consultation	Quarter 3 2022
Submit for examination	Quarter 4 2022
Examination	Quarter 4 2022 – Quarter 2 2023
Modify and adopt Charging Schedule	Quarter 2 2023 – Quarter 3 2023

## 5. Other Statutory and Non-Statutory Planning Documents

### Supplementary Planning Documents and Guidance

- 5.1 The council has adopted a number of Supplementary Planning Documents to date as detailed in paragraph 2.5 above. Whilst it is not anticipated that these guidance documents will need to be revised at present, the council's adopted documents will be kept under review as the local plan review and CIL progress. The LDS will be updated as necessary.
- 5.2 Currently there are two new guidance documents programmed for the next three year period, which includes the Dunton Hills Garden Village Design Guidance SPD and Planning Obligations SPD. The timetable for the two documents is set out in Table 3 below and Appendix A.
- 5.3 The Dunton Hills Garden Village Design Guidance SPD will complement local plan policies R01 (I) & (II) to provide more detailed guidance and ensure the key aims of the strategic allocation are realised.
- 5.4 The Planning Obligations SPD will support several local plan policies by providing further detail on the collection of planning obligations / contributions received by the council as a result of planned development across the borough.

**Table 3: Other Statutory and Non-Statutory Planning Documents Timescales**

Stage	Estimated timescales
<b>Dunton Hills Garden Village Design Guidance SPD</b>	
Adoption	Quarter 3 2022
<b>Planning Obligations SPD</b>	
Preparation	Quarter 2 / Quarter 3 2022
Public consultation and review of comments	Quarter 3 2022 / Quarter 4 2022
Adoption	Quarter 4 2022 / Quarter 1 2023

### Neighbourhood Plans

- 5.5 Neighbourhood plans are community-led plans for guiding the future development and growth of a local area introduced by the Localism Act (2011). Such plans must be in general conformity with the strategic policies in the local development plan for the area. They are subject to independent examination and referendum, and once adopted will form part of the statutory local development plan for the area.



- 5.6 In areas with defined parishes, these plans can be prepared by the parish council in consultation with the local community. As of July 2022 there are three designated neighbourhood planning areas in the borough: Doddinghurst, Ingatestone & Fryerning and West Horndon.
- 5.7 Ingatestone & Fryerning Parish Council formally submitted their neighbourhood plan to Brentwood Borough Council in November 2021. Regulation 16 consultation of the Ingatestone & Fryerning Neighbourhood Plan took place between December 2021 and March 2022. The neighbourhood plan was submitted for independent examination in April 2022 with the Inspector's report received in June 2022 confirming, subject to modifications, that it could proceed to referendum. The referendum is scheduled to take place in August 2022 and if successful will be a 'made' plan.

### **South Essex Joint Strategic Plan**

- 5.8 The local authorities across South Essex have a history of working collaboratively on a range of issues to develop appropriate approaches to meet common strategic aims and objectives. Building on this partnership working approach, the Leaders and Chief Executives from Basildon, Brentwood, Castle Point, Rochford, Southend-on-Sea and Thurrock Councils, and Essex County Council initiated an approach of collaboration to develop long term place-based growth ambition in July 2017. This culminated in the signing of a South Essex 2050 Memorandum of Understanding in January 2018. A joint approach will enable South Essex to collectively support economic growth and sustainable development across the sub-region and effectively respond to external pressures, such as the Thames Estuary 2050 Commission and the London Plan.
- 5.9 Part of the South Essex ambition to effectively deal with the challenge of growth will be realised through the preparation and adoption of a Joint Strategic Plan. The Joint Strategic Plan will be a high-level planning framework covering the whole of South Essex, which includes the six local authorities listed above.
- 5.10 A Statement of Common Ground has been prepared, in accordance with the NPPF, to support the preparation of the Joint Strategic Plan. This will ensure that there is not only a proactive and positive approach to strategic planning matters across the sub-region, but that there is a clear (and agreed) approach to how these will be delivered in all relevant local planning documents.
- 5.11 The scope and timetable of the Joint Strategic Plan is currently under review and an up-to-date timetable will be provided in a future LDS update once agreed.

## **6. Monitoring and review**

- 6.1 The Authority (formerly Annual) Monitoring Report (AMR) is a document prepared by the Council which includes information on progress of local development plan preparation. This report is published on the council's website at the earliest opportunity.
- 6.2 The Council's progress in respect of plan production will be monitored through the AMR. Each year the AMR will:
- a) show how the council is performing against the timescales in the LDS for the preparation of development plan documents and supplementary planning documents
  - b) consider the effectiveness of extant policies in advance of the adoption of new planning policy documents
  - c) monitor local development plan policies against a set of national and local indicators
  - d) provide an up to date list of documents in preparation and adopted, and provide details of future reviews of those documents.
- 6.3 This LDS sets out broad timetables for the preparation of development plan documents. These timetables will be reviewed and refined as the document production progresses.

## 7. Risks and contingencies

**Table 4: Local Development Scheme Risks and Contingencies**

	<b>Risk</b>	<b>Level</b>	<b>Contingency</b>
7.1	Significant changes to the planning system – publication of new Government legislation/guidance	Medium to High	Continue to keep fully abreast with any changes/publications of Government legislation. Assess as soon as practicable any revisions that may be necessary to the Local Plan.
7.2	Problems/inability to engage with key stakeholders and the community	Low	Continue to engage and maintain good relationships with key stakeholders and communities. Raise any problems or issues through appropriate channels.
7.3	Failure to comply with Duty to Cooperate	Medium	Prepare and implement a Duty to Cooperate strategy and ensure early engagement at officer and Member level.
7.4	Handling higher than expected numbers of representations	Medium to High	Engage additional staff resources during and after consultation periods with the use of external specialists if necessary.
7.5	Loss of key staff within Planning Policy team	Medium	Recruiting temporary contract staff, if necessary, to cover any shortfalls in staffing levels.
7.6	Inability for the Planning Inspectorate to deliver hearings and reports on time	Medium	This would affect the Examination and adoption of the Local Plan Review. No contingency as Planning Inspectorate is the sole body able to undertake this process.
7.7	Legal compliance and soundness tests not met at examination	Medium	Robust, evidence based plan. Effective public engagement. Ongoing engagement with specific prescribed bodies as part of the Duty to Cooperate.
7.8	Legal Challenges to the Local Plan	Medium	Seek appropriate legal advice through the preparation of the

			Local Plan and keep abreast of best practice.
7.9	Budget shortfalls as a result of timetable delays, examination length and / or legal challenge	Medium	Regular budget monitoring. Seeking external funding sources. Ongoing engagement with S151 officer and Leadership Team.

## Appendix A: Summary timetable of documents to be produced

Document Title	2022			2023				2024				2025			
	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Development Plan Documents															
Brentwood Local Plan Review						Reg 18		Reg 19		Sub					
Charging Schedules															
Community Infrastructure Levy (CIL)															
Supplementary Planning Documents and Guidance															
Dunton Hills Garden Village Design Guidance SPD															
Planning Obligations SPD															

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<b>Committee(s):</b> Policy, Resources & Economic Development Committee	<b>Date:</b> 13 July 2022
<b>Subject:</b> Lower Thames Crossing Local Refinement Consultation	<b>Wards Affected:</b> All
<b>Report of:</b> Phil Drane, Corporate Director (Planning & Economy)	<b>Public</b>
<b>Report Author/s:</b> Name: Jonathan Quilter, Corporate Manager (Strategic Planning) Telephone: 01277 312500 E-mail: jonathan.quilter@brentwood.gov.uk	<b>For Decision</b>

## Summary

National Highways are inviting views on the Lower Thames Crossing, a proposed new motorway connecting Essex and Kent through a tunnel beneath the River Thames to provide additional road capacity. A Local Refinement consultation has been launched following several previous consultations. This precedes the expected submission of a Development Consent Order application for the scheme.

This consultation includes several technical refinements to the project, some of which directly impact on infrastructure or land within Brentwood borough. In addition to the ongoing discussion taking place with National Highways regarding outstanding issues impacting the borough, this report sets out a proposed response to the local refinements.

## Recommendation(s)

**Members are asked to:**

- R1. Approve the response to the Lower Thames Crossing Local Refinement Consultation, as set out in Appendix A.**

## Main Report

### **Introduction and Background**

1. The Lower Thames Crossing is a proposed new motorway connecting Kent, Thurrock and Essex through a tunnel beneath the River Thames. On the south side of the Thames, the new road will link the tunnel to the A2 and M2 in Kent. On the north side, it will link to the A13 and junction 29 of the M25 in the London Borough of Havering, and areas for associated works in the south-west

of Brentwood borough. According to National Highways it will provide much needed new road capacity across the river east of London with quicker and more reliable journeys locally, regionally and nationally.

2. This is the most ambitious project of its kind in the country. It is the largest single road investment project in the UK since the M25 was completed around 35 years ago. The crossing under the Thames will be the longest road tunnel in the country. At 16 metres in diameter, it will be one of the largest bored tunnels in the world. Current timescales for the project are for construction to commence from 1 January 2024 and be completed by 31 December 2029.
3. There have been several consultations held regarding the Lower Thames Crossing as the project has progressed, which the council has responded to. Most recently the council responded to the Community Impacts Consultation launched in July 2021 (Item 140 Policy, Resources and Economic Development Committee, 30 September 2021).
4. In October 2020, National Highways submitted a Development Consent Order (DCO) application to the Planning Inspectorate for examination. In November 2020, following feedback from the Inspectorate regarding the content of the application and supporting information, National Highways decided to withdraw the application.
5. Following the Community Impacts Consultation in July 2021 it was anticipated that the DCO would be resubmitted towards the end of last year. Since then further work has been undertaken by National Highways on localised changes to the project. The changes were in response to ongoing design work, engagement with stakeholders and feedback through previous consultations. It is expected that the DCO application will be submitted later this year following consideration of comments in response to the local refinement consultation.

### **Issue, Options and Analysis of Options**

6. The Local Refinement Consultation provides further detail about the Lower Thames Crossing project in respect of localised changes to the project since the previous consultation stage in 2021. This includes the redesign of and addition to open space provision, improvements to Orsett Cock junction, new bridge over the A127 west of junction 29 in Havering, modified access to the northern tunnel entrance and additional environmental compensation.
7. In response, Appendix A sets out the issues affecting Brentwood borough and the council's interest in partnership working across South Essex and beyond. The response is split into two parts according to the structure of the consultation questions. Comments made regarding principles of the project,



wider benefits, and unresolved issues are set out at the beginning. These are largely reemphasised from previous consultation stages for continued engagement with National Highways.

8. Comments made regarding proposed changes to the section of the route north of the river and in particular M25 junction 29 are made in response to questions 1h, 1i and 2a (“Improvements for walkers, cyclists and horse riders: A127/M25 junction 29”). In summary these are as follows:
  - a) Support for aim to improve infrastructure and facilities for non-motorised users including horse riders;
  - b) Concerned that proposals may be incompatible with those being developed through both the adopted Brentwood Local Plan and the current planning application for Brentwood Enterprise Park and request for continued engagement to resolve and ensure the most suitable solution for non-motorised users is achieved; and
  - c) Request for clarification on how non-motorised users will travel through the northern section of junction 29 and what improvements are deemed necessary.
9. Comments on nitrogen impact and compensation: Hole Farm, Brentwood, are made in response to question 3d. Since the last consultation Natural England has advised National Highways that the project should consider the impacts of Nitrogen Deposition on the environment and specific habitats. As a result the project now identifies proposed compensation sites for habitat creation amounting to approximately 250ha. Of the four areas identified one includes Hole Farm, Brentwood which was originally purchased by National Highways in 2021. The amount of land anticipated to be used for compensatory measures is around 75ha. The response from the Council requests further clarification on the amount of the overall site that would eventually be accessible to the public given significant elements of the site is now required for specific compensatory measures relating to Nitrogen Deposition. There is also a repeat of previous comments that it is expected there will be improved access through the area for non-motorised users.
10. With regards to changes to the Order Limits for the scheme comments have been made in response to question 4a. This acknowledges the addition of Hole Farm due to being identified as a Nitrogen Deposition compensatory area and parts of the non-motorised users crossing over the A127. There are also reductions in the order limits on land south east of the M25 junction 29 which overlapped with the Brentwood Enterprise Park allocation.

11. Next steps, once the consultation has closed, include a review of all the comments received. A summary of the responses will be published, and National Highways will describe how proposals have been informed and influenced by these. This will form part of the DCO, which is expected for submission late 2022.

### **Development Consent Order (DCO)**

12. The DCO process was introduced in the Planning Act 2008, to simplify and speed up the process of obtaining planning permission for Nationally Significant Infrastructure Projects, such as the works proposed for the Lower Thames Crossing. Since the introduction of the Localism Act in 2011, planning applications for Nationally Significant Infrastructure Projects are determined by the Planning Inspectorate and the Secretary of State. As part of this process there is likely to be public hearings during examination. Following this, the examining authority will make a recommendation to the Secretary of State for Transport, who will decide whether the scheme can go ahead.
13. Although very little of the Lower Thames Crossing works are within the borough, some of the required works to the M25 and junction 29 will involve land in the borough. Most of the scheme is within Thurrock and south of the River Thames in Kent, as well as partly in the London Borough of Havering to the west of Brentwood. As an authority impacted by the proposals, the Council will be involved in the DCO process.
14. Once National Highways commence the DCO process there will be strict deadlines to adhere to, often with challenging timeframes. Once submitted the council's Planning Development Management Team will be responsible for considering the scheme and responding to the Planning Inspectorate. Delegated authority for the Corporate Manager of Planning Development Management to determine the DCO process was approved by Policy, Resources and Development Committee on 30 September 2021 (Item 140). Updates on progress will be brought to Members when relevant.

### **Reasons for Recommendation**

15. It is recommended that the issues set out in Appendix A be issued in response to the Lower Thames Crossing Community Impacts Consultation. The council has engaged with National Highways on the Lower Thames Crossing project to date. It is proposed that issues raised in previous consultation responses are maintained where relevant and/or unresolved.

## **Consultation**

16. The Lower Thames Crossing Local Refinement Consultation took place between 12 May 2022 and 20 June 2022. The response set out in Appendix A was submitted to comply with the consultation deadline. This is subject to committee approval in accordance with the recommendation.

## **References to Corporate Plan**

17. Delivery of the Lower Thames Crossing will improve connections for the borough residents and businesses. Key associated economic benefits contribute to the council's corporate objectives to grow the economy.

## **Implications**

### **Financial Implications**

**Name/Title: Jacqueline Van Mellaerts, Corporate Director (Finance & Resources) and Section 151 Officer**

**Tel/Email: 01277 312500/jacqueline.vanmellaerts@brentwood.gov.uk**

18. There are no direct financial implications. The cost of officer time through involvement in the expected Development Consent Order process has been considered through the Planning Development Management budget.

### **Legal Implications**

**Name & Title: Amanda Julian, Corporate Director (Law & Governance) and Monitoring Officer**

**Tel & Email: 01277 312500/amanda.julian@brentwood.gov.uk**

19. This is a major national infrastructure project with implications for the borough, it is important that the Council respond and consider the decision-making process of the Development Consent Order. Engagement in this way is consistent with the Duty to Cooperate and the Council's adopted Statement of Community Involvement.

### **Economic Implications**

**Name/Title: Phil Drane, Corporate Director (Planning and Economy)**

**Tel/Email: 01277 312500/philip.drane@brentwood.gov.uk**

20. The potential economic benefits of a new Thames crossing will benefit Brentwood businesses and contribute to unlocking growth opportunities in the South Brentwood Growth Corridor (A127 and railway to London Fenchurch Street), as confirmed in the Brentwood Local Plan. Improving safety and journey time reliability are important factors in the economic performance of the area. This will be achieved through delivery of the Lower Thames Crossing, alleviating pressure at the Dartford Crossing and opening new links, as well as

adding capacity to M25 junction 29. Investment in such schemes will help local businesses operate with more certainty and encourage inward investment. This will have benefits to businesses and residents in and around the South Brentwood Growth Corridor, although the wider benefits will be felt across South Essex and beyond. National Highways set out that many representatives from a range of businesses indicate their main concern is transport infrastructure. The project will also create new training and job opportunities during construction that will boost both the local and regional economies. The risk of not investing in transport infrastructure is likely to have negative impacts on the local economy.

### **Equality and Diversity Implications**

**Name/Title: Kim Anderson, Corporate Manager (Communities, Leisure & Health)**

**Tel/Email: 01277 312500/kim.anderson@brentwood.gov.uk**

21. The consultation includes consideration of equality and diversity as part of the planning, construction and operation of Lower Thames Crossing.

**Other Implications** (where significant) – i.e. Health and Safety, Asset Management, Risk Management, Section 17 – Crime & Disorder, Sustainability, ICT.

22. The Lower Thames Crossing proposals involve partnership working with Essex County Council as highways authority (in addition to National Highways). The proposals also have implications for the emerging strategic planning framework for South Essex. This will need to be considered through the plan-making process for both the Council and the Association of South Essex Local Authorities (ASELA), of which the council is a partner.
23. Following the consultation, the DCO application will be submitted by National Highways to the Council as local planning authority. A DCO is the means of obtaining permission for development categorised as Nationally Significant Infrastructure Projects (NSIP). This includes energy, transport, water and waste projects. This is a statutory process and has implications for the resources of the Council's Planning Development Management Team when assessing the DCO in line with set requirements and timeframes.

### **Background Papers**

- Lower Thames Crossing Local Refinement Consultation Guide (May 2022): <https://ltcconsultation2022.nationalhighways.co.uk/wp-content/uploads/2022/05/LTC-LR-Con-Guide-to-local-refinement-consultation.pdf>
- Consultation material, including background documents and maps, can be found on the National Highways website at: <https://ltcconsultation2022.nationalhighways.co.uk/>

- Planning Act 2008 Guidance on Changes to Development Consent Orders, Department for Levelling Up, Housing and Communities  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/485064/Making\\_changes\\_guidance\\_to\\_Development\\_Consent\\_Orders.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/485064/Making_changes_guidance_to_Development_Consent_Orders.pdf)
- Brentwood Borough Council response to the Lower Thames Crossing Community Impacts Consultation and Development Consent Order (Item 140, Policy, Resources and Economic Development Committee, 30 September 2021)
- Brentwood Borough Council response to the Lower Thames Crossing Design Refinement Consultation (Item 497, Policy, Resources and Economic Development Committee, 9 September 2020)
- Brentwood Borough Council response to the Lower Thames Crossing Supplementary Consultation (Item 432, Policy, Resources and Economic Development Committee, 18 March 2020)
- Brentwood Borough Council response to the Lower Thames Crossing Statutory Consultation (Item 263, Ordinary Council, 5 December 2018)
- Brentwood Borough Council response to the Lower Thames Crossing Route Consultation (Item 416, Policy, Finance and Resources Committee, 22 March 2016)

### **Appendices to this report**

- Appendix A: Response to Lower Thames Crossing Local Refinement Consultation, June 2022

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## **Brentwood Borough Council response to the Lower Thames Crossing local refinement Consultation, June 2022**

### **Principle**

1. Brentwood Borough Council (the council) welcomes the opportunity to formally engage with National Highways on the Lower Thames Crossing (LTC) project and notes the changes proposed as part of the local refinement consultation. The council notes the ongoing cooperation with Highways England regarding LTC and the Statement of Common Ground between our two organisations. In this regard, the response to this consultation should be read in conjunction with comments made to previous LTC consultations.
2. This is a complex project. The council is grateful for the way that the National Highways LTC project team has made efforts to explain things simply in the consultation material.

### **Wider Benefits**

3. The council continues to support the need for an additional river crossing. Evidence and experience show that Dartford is heavily congested, which not only delays journeys but also has a negative impact on the local and national economy. However, the council seeks additional clarity detailed in response to questions 1h, 1i, 3d, and 4a that would ensure the protection of planned growth delivery, small local roads, and villages.
4. The Brentwood Local Plan 2016-2033 was adopted in March 2022 following an extensive period of examination in public. Allocations for significant development are identified within the local plan near to LTC work at M25 junction 29, including delivery of a garden village (Dunton Hills Garden Village) and strategic employment land (Brentwood Enterprise Park), among other things. This has been the subject of comments made in response to previous LTC consultations and moving forward the council wishes to repeat the opportunity for synergy when delivering growth and highways improvements from the LTC project in and around M25 junction 29. The delivery of both Dunton Hills Garden Village and Brentwood Enterprise Park is progressing with live planning applications where detailed discussion should continue with National Highways (and the local highway authority Essex County Council).

## Unresolved issues / continued engagement

5. Several matters that the council has raised through previous consultation stages have been addressed. In addition to the comments made in response to this local refinement consultation, previous comments made and ongoing discussion between the council and National Highways include:
- a) Need for the LTC to support economic growth aims in the borough and wider area.
  - b) Importance of delivering improved transport capacity in South Essex through joint working with the Association of South Essex Local Authorities (ASELA).
  - c) Opportunity for the LTC route north of the Thames in Essex (Thurrock Borough specifically), to provide more connections that could unlock new development potential, and the need to work closer with ASELA on this.
  - d) Resolution of the existing access at M25 junction 29 to Brentwood Enterprise Park (an area of new employment land being proposed through the Brentwood Local Plan, one of the two largest new employment sites in Essex), and Codham Hall Farm (existing employment uses).
  - e) Questions about use of land proposed for new employment uses at Brentwood Enterprise Park during the construction of LTC (long-term or permanent access through the site, gas pipeline diversion, etc).
  - f) The need for non-motorised uses to be prioritised beyond simply crossing the A127 (although this is supported), and for these to be integrated with mitigations planned through the delivery of Brentwood Enterprise Park and other local plan growth (the provision of this is even more important considering the environmental mitigation proposed by the creation of a new community woodland at Hole Farm in Warley).
  - g) Questions around the impact on housing delivery projections within the Brentwood Local Plan period (to 2033). In particular, for planned growth in the South Brentwood Growth Corridor due to main LTC works to the A127 and enabling works.
  - h) Clarity on how trips from the construction of Brentwood Enterprise Park are taken into account or once the park is operational and the impacts to Brentwood Enterprise Park once the rolling contraflow enabling works on St Mary's Lane are active.
  - i) The appropriate consideration and control of spoil movements from the site which are currently not clear.
  - j) Request for continued dialogue on the Travel Plan that impacts compound CA16. In addition continued engagement on the prospect of



including the CA16 contractor into the Demand Response Transport model to be launched in the South Brentwood Growth Corridor and potentially beyond.

- k) Queries concerning whether National Highways have sufficient resource in place to effectively administer and monitor the Framework Construction Travel Plan.
- l) Continued request for a structure that allows the Council as direct feedback as possible to National Highways and the local contractor should any issues arise.

**Q1h and Q1i. Proposed changes to the section of the route north of the river: M25 junction 29 and Q2a: Improvements for walkers, cyclists and horse riders: A127/M25 junction 29**

- 6. The proposed changes relevant to Brentwood borough concern the upgrade of walking, cycling and horse riding bridge over the A127, east of M25 junction 29. These concern an update to the planned A127 bridge so it can accommodate horse riders and to include a link to bridleway BR183. This would allow for segregation of horse riders from motor traffic including HGVs which is the situation with the current bridge arrangements.
- 7. There are a number of points the council wish to raise in respect of these proposals, which are set out below:
  - a) The council supports the aim to improve infrastructure and facilities for non-motorised users including horse riders which is important in achieving overall sustainability aims.
  - b) There are concerns that the proposals may be incompatible with those being developed through both the adopted Brentwood Local Plan and the current planning application for Brentwood Enterprise Park. The council request that continued engagement is undertaken between National Highways, Essex County Council, Brentwood Borough Council and the Brentwood Enterprise Park promoters, St Modwen. This is to ensure that the most suitable solution is developed in respect of ensuring non-motorised users can cross the A127 in a safe and convenient manner.
  - c) Linked to this the council would also want to ensure that due consideration has been given to any necessary improvements for the onward travel of non-motorised users travelling through the northern part of M25 junction 29. This is particularly important as the southern arms of the junction will be closed off for non-motorised users as a result of the Lower Thames Crossing proposals. Also this will be the key connection between the new bridges (numbered 25 and 26) identified in Havering and Brentwood. Currently the footways in this location have uncontrolled crossings across the north bound on slip and the footways are not

particularly wide. The council would welcome further discussion on the details of how this matter is proposed to be addressed.

### **Q3d. Nitrogen impact and compensation: Hole Farm, Brentwood**

8. It is understood that since the last consultation, in consultation with Natural England, the project has had to consider the impacts of Nitrogen Deposition on the environment and specific habitats.
9. As a result of this the project now identifies proposed compensation sites for habitat creation amounting to approximately 250ha. Of the four areas identified one includes Hole Farm, Brentwood. This was originally purchased by National Highways in 2021 to deliver benefits for communities and the environment. Hole Farm has been deemed suitable as a compensatory habitat because it is close to Codham Hall Woods and other designated sites. It would also link with the existing woodlands that form the habitat network in this area. The amount of land anticipated to be used for compensatory measures is around 75ha.
10. The Council recognises that a masterplan is being developed for the entire site in partnership with Forestry England and Thames Chase Community partners. The masterplan will include proposals for the facilities associated with a community woodland such as a tree nursery and a visitor centre. It is understood that these elements of the scheme would be consented separately from the Lower Thames Crossing DCO via a planning application submission to Brentwood Borough Council.
11. The Council welcomes the commitment of National Highways to continue engagement with the Council and other key stakeholders in the development of this part of the project. As matters progress we would request clarification on the amount of the overall site that would eventually be accessible to the public given that significant elements of the sites are now required for specific compensatory measures relating to Nitrogen Deposition. We would also repeat our previous comments that there is expectation for non-motorised users to have improved access through the areas, including links outside the new community woodland.

### **Q4a. Changes to the Order Limits, special category land and private recreational facilities**

12. From review of the plans provided at part of the local refinement consultation the Council recognises that there are some specified changes to the order limits for the proposal. These include the addition of Hole Farm on the basis of being required for compensatory measures relating to nitrogen deposition. There are also additional areas relating to the non-motorised users crossing over the A127. There are reductions in the order limits on land to the south east of J29 which overlapped with the Brentwood Enterprise Park allocation.

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<b>Committee(s):</b> Policy, Resources and Economic Development Committee	<b>Date:</b> 13 July 2022
<b>Subject:</b> UK Shared Prosperity Fund (UKSPF)	<b>Wards Affected:</b> All
<b>Report of:</b> Steve Summers, Strategic Director	<b>Public</b>
<b>Report Author/s:</b> Name: Laurie Edmonds, Corporate Manager (Economic Development) Telephone: 01277 312500 E-mail: laurie.edmonds@brentwood.gov.uk  Name: Phil Drane, Corporate Director (Planning and Economy) Telephone: 01277 312500 E-mail: philip.drane@brentwood.gov.uk	<b>For Decision</b>

## Summary

Brentwood Borough Council has been allocated funding through the UK Shared Prosperity Fund, which can only be accessed through submission of an Investment Plan prior to the 1 August 2022 deadline.

The UK Shared Prosperity Fund (UKSPF or the Fund) is a central pillar of the UK government's ambitious Levelling Up agenda and a significant component of its support for places across the UK. It provides £2.6 billion of new funding for local investment by March 2025, with all areas of the UK receiving an allocation from the Fund via a funding formula rather than a competition. It will help places across the country deliver enhanced outcomes and recognises that even the most affluent parts of the UK contain pockets of deprivation and need support.

## Recommendation

**Members are asked to:**

**R1. Delegate authority to the Strategic Director, in consultation with the Chair of the Policy, Resources and Economic Development Committee, to prepare and submit an Investment Plan for the UK Shared Prosperity Fund.**

## Main Report

### Introduction and Background

1. The UK Shared Prosperity Fund (UKSPF) was launched in April 2022 and provides £2.6 billion in funding for local investment by March 2025. It is the government's replacement for the European Structural and Investment Programme (ESIF).
2. The Fund supports the ambitions of the Levelling Up White Paper and aims to build pride in place and increase life chances across the country.
3. All areas of the UK will receive an allocation from the Fund which is calculated using a funding formula. It is not a competitive bidding process.
4. The UKSPF sets out three key investment priorities:
  - a) Community and Place
  - b) Supporting Local Businesses
  - c) People and Skills
5. The funding for the first two priorities will commence in 2022/23, while the 'people and skills' priority will commence in 2024/25.
6. In England, the UKSPF will operate across the geographies of the Mayoral Combined Authorities and lower tier or unitary authorities. As such, Brentwood Borough Council has been identified as the lead authority for the UKSPF within the borough of Brentwood.
7. The Council has been allocated exactly £1,000,000 through the UKSPF. This funding can only be accessed through a submitted Investment Plan.
8. An annual funding profile providing a breakdown of the funding for the three financial years has been developed by the Department for Levelling Up, Housing and Communities (DLUHC) for Brentwood. The breakdown is as follows:

<b>Year</b>	<b>2022-23</b>	<b>2023-24</b>	<b>2024-25</b>
<b>Allocation</b>	£51,262	£102,524	£846,214

9. As can be seen above, the majority of the funding is not available until the third year (2024-25). It is therefore imperative that the intended spend within the Investment Plan reflects the allocation profile.

10. In 2022-23, a minimum of 10% spend needs to be capital expenditure, followed by a minimum of 13% in 2023-24 and 20% in 2024-25.
11. As lead authority, Brentwood Borough Council is responsible for developing a local Investment Plan which needs to be submitted to government by 1 August 2022. The Investment Plan must be approved by the government before the funding is made available. Once the Investment Plan is approved, the council will have responsibility for managing the Fund, processing payments and day-to-day monitoring.
12. The Investment Plan is completed using a set template, which addresses the local context, outcomes, interventions and delivery. UKSPF guidance provides 41 interventions that Brentwood projects should ideally align against. At this stage, projects do not need to be fully developed and the information required about each project to be included within the Investment Plan is not onerous.
13. Investment plans do not need to cover each of the three key priority areas but should instead seek to address local challenges and opportunities.
14. The DLUHC are responsible for leading the assessment process for signing off investment plans. Where a plan cannot be signed off first time, feedback will be given and the DLUHC will work with the lead authority to secure sign off.
15. Collaboration with partners is a core component of the Fund. Working across boundaries with different local authorities is heavily encouraged, this especially applies to the *supporting local business* and *people and skills* priorities. Lead authorities should aim to include as wide a range of stakeholders and partners as possible; these include:
  - a) local businesses and investors
  - b) business support providers or representatives
  - c) local partnership boards and strategic bodies
  - d) prominent local community & faith organisations
  - e) voluntary, sector social enterprise and civil society organisations
  - f) education and skills providers and employment experts and providers
  - g) nature, environmental or associated representatives
  - h) public health representatives
  - i) police and crime representatives
  - j) local MPs
16. Collaboration has taken place with Rochford District Council along with other Essex authorities to identify potential synergies. Engagement with other stakeholders including those listed above will be ongoing throughout the process.

## Issue, Options and Analysis of Options

17. The council has appointed a local consultant firm, Russell and Dawes to develop its Investment Plan in advance of the 1 August 2022 deadline.
18. The proposed Investment Plan identifies priorities with the council's Corporate Plan 2020-2025 that align with the Investment Priorities of the UKSPF and consists of an outline proposal that features a focus on high street regeneration, both through physical improvements and through the promotion of a local arts and cultural offering to develop a stronger and identifiable Brentwood borough brand. Projects are likely to include, but not necessarily limited to:
  - a) Investment in open air markets, events and improvements to town centre retail and service sector infrastructure
  - b) Support for local arts, cultural, heritage and creative activities
  - c) Development and promotion of wider campaigns which encourage people to visit and explore the local area
  - d) Development and promotion of the visitor economy, such as local attractions, trails, tours and tourism products
  - e) Support businesses at all stages of their development to start, sustain, grow and innovate
  - f) Support decarbonisation and improving the natural environment whilst growing the local economy
19. At this stage, the Investment Plan needs to provide an indication of the expected projects but these projects need not be exhaustively defined. It is accepted that a degree of refinement and refocus will be required over time as priorities and opportunities become clearer. Therefore, the council is not expected to exhaustively define its priorities for the Fund at this stage and doing so may impact its ability to prepare an Investment Plan before the deadline.
20. The council is not obliged to prepare and submit an Investment Plan prior to the 1 August 2022 deadline. However, a decision to not do so would forego the Council's allocation through the UKSPF and in doing so, would forego the opportunity to fund new interventions in the borough and the opportunities to improve outcomes for its residents and businesses.
21. By preparing an Investment Plan the council will be able to access allocated funding through the UKSPF and address opportunities to improve outcomes for local residents and businesses. Should this Investment Plan not be prepared, either robustly or at all, there is a risk that the council will not receive this allocation. The council is engaging specialist consultancy to ensure its

Investment Plan is robust.

22. The council has undertaken initial engagement with stakeholders and will continue to undertake such engagement throughout the process to ensure opportunities are identified and inefficiencies avoided. This will mitigate risk of missed opportunities or duplicative work that may otherwise lead to a lower quality of output from the funding.

### **References to Corporate Plan**

23. The council's Corporate Strategy identifies priority areas, which include protecting our environment, growing our economy, improving housing, and developing our communities. The project affects strategic priorities through its proposals. The council's Economic Development Strategy defines economic objectives that will be consistent with the Investment Plan for Brentwood.

### **Implications**

#### **Financial Implications**

**Name/Title: Jacqueline Van Mellaerts, Corporate Director (Finance & Resources)**  
**Tel/Email: 01277 312500/jacqueline.vanmellaerts@brentwood.gov.uk**

24. The Fund has been allocated to cover the cost of projects that deliver local benefits. The Investment Plan needs to identify the council's strategic priorities for the Fund, along with expected outputs and outcomes.
25. In addition to the £1m UKSPF allocation, a further one-off allocation of £20k will be provided from DLUHC for consultancy support.
26. The Council will be able to use up to 4% of our UKSPF allocation to undertake necessary fund administration, such as project assessment, contracting, monitoring and evaluation and ongoing stakeholder engagement.

#### **Legal Implications**

**Name & Title: Amanda Julian, Corporate Director (Law & Governance) and Monitoring Officer**

**Tel & Email: 01277 312500/amanda.julian@brentwood.gov.uk**

27. All spend associated with the Fund must be compliant with the Public Contracts Regulations 2015 and follow the Council's procedures.

#### **Economic Implications**

**Name/Title: Phil Drane, Corporate Director (Planning and Economy)**  
**Tel/Email: 01277 312500/philip.drane@brentwood.gov.uk**

28. The economic implications are included within this report. The Fund provides investment for projects that help to deliver economic growth. It is important that

the council identifies broad themes through its Investment Plan to secure allocated funding.

### **Equality and Diversity Implications**

**Name/Title: Kim Anderson, Corporate Manager (Communities, Leisure and Health)**

**Tel/Email: 01277 312500/kim.anderson@brentwood.gov.uk**

29. Equality implications will be considered as individual work streams are developed.

**Other Implications** (where significant) – i.e. Health and Safety, Asset Management, Risk Management, Section 17 – Crime & Disorder, Sustainability, ICT.

30. Investment in High Streets and related initiatives can include elements of designing out crime. Engagement with key stakeholders has included Essex Police and this will continue as part of further defining projects.

### **Background Papers**

- The UK Shared Prosperity Fund guidance has been published online: <https://www.gov.uk/government/publications/uk-shared-prosperity-fund-prospectus/uk-shared-prosperity-fund-prospectus>

### **Appendices to this report**

None



<b>Committee(s):</b> Policy Resources and Economic Development	<b>Date:</b> 13 <sup>th</sup> July 2022
<b>Subject:</b> Membership Constitutional Working Group	<b>Wards Affected:</b> All
<b>Report of:</b> Amanda Julian Corporate Director (Law & Governance) and Monitoring Officer	<b>Public</b>
<b>Report Author/s:</b> Name: Amanda Julian Telephone: 01277 312500 E-mail: amanda.julian@brentwood.gov.uk	<b>For Decision</b>

## Summary

The Council has a statutory duty to maintain an up to date Constitution, Local Government Act 2000, the Constitution must cover standing orders, delegations and code of conduct for members, it can also have local conditions and rules that reflect its own area and how to make decisions.

The Monitoring Officer (MO) has the responsibility to ensure that the Council's Constitution is up to date. To facilitate this the Council under Article 12 has convened a Constitution Working Group (CWG) which is a cross party working group that consults with the MO on changes necessary to ensure an effective and up to date Constitution is maintained by the Council.

## Recommendation(s)

**Members are asked to:**

**R1. Agree the nominations for the Constitutional Working Group set out in paragraph 9 for the next municipal year.**

## Main Report

### **Introduction and Background**

1. The Local Government (Access to Information) Act 1985 lays down how meetings of the Council should be advertised and how the public should have access to information and meetings.

2. The question asked is could a working group exist outside the committee system and therefore there is no need for it to be politically balanced or open to the public, or as asked should it be proportionality represented under Widdecombe rules.
3. The matter was addressed in *R v Eden District Council ex parte Moffat* (1989) by the Court of Appeal. The Court accepted the concept that a working group is acceptable in law. There is no reason not to have a panel or body that could be tasked to think what the best way would be to do things.
4. The primary consideration is the intention of the Council the was addressed in *R v Warwickshire District Council ex parte Bailey* (1991) which decided as long as there was nothing inherently unlawful behind the intent of the working group then as long as intended to be a working group that was what it was. In this case there was no delegated authority to make decisions.
5. The Local Government Act 2000 places a duty on local authorities to have a written Constitution that must cover standing orders, delegated processes and the code of conduct for members, it can also have local conditions and rules that reflect its own area and how to make decisions.
6. The Monitoring Officer (MO) role includes ensuring that the Constitution is kept up to date. The MO can make minor changes to the Constitution without consultation with the Constitutional Working Group (CWG) or Audit and Scrutiny Committee if necessary, by law or to correct errors, see Article 12 of the Constitution. In all other cases the CWG or Audit and Scrutiny Committee will have due regard to the advice of the MO prior to submitting a report to Full Council for approval. The MO may submit an independent report of the CWG or Audit and Scrutiny Committee does not accept their advice.
7. To facilitate changes to the Constitution the CWG has been set up as a working group the group has no delegated authority to make decisions and but is tasked to take heed of the advice of the MO to what changes to the Constitution would facilitate decision making, transparency and good governance of the Council.
8. The Council's Constitution at part 2 paragraph 2.1.18 requires the Committee to consider a report from the MO at the beginning of the Municipal Year, for the Committee to appoint the membership of the CWG.

## **Issue, Options and Analysis of Options**

9. Group Leaders have been consulted regarding nominations for appointment to the CWG and have nominated the following member for appointment:

Cllr C Hossack  
Cllr G White  
Cllr J Laplain  
Cllr Dr T Barrett

10. Should there be a need to change the membership of the CWG during the municipal year, this should be approved by the Committee following nominations from the Group Leaders.

## **Reasons for Recommendation**

11. The Council has a statutory duty to have a written Constitution which sets out how the Council will operate and make decisions. The Constitution must be kept up to date and must be published.
12. The principle of proportionality is key to making decisions in that the action must be proportionate to the desired outcome due consultation and the taking of professional advice from officers; respect for human rights; a presumption in favour of openness; and clarity of aims and desired outcomes.
13. The Council has agreed that in order to promote good governance that there should be a CWG which reports to Council to recommend changes to the Constitution.

## **Consultation**

14. None

## **References to Corporate Plan**

15. Will enhance an effective and efficient Council by promoting strong governance and effective decision making.

## **Implications**

### **Financial Implications**

**Name/Title: Jacqueline Van Mellaerts, Director of Corporate Resources**

**Tel/Email: 01277 312500/jacqueline.vanmellaerts@brentwood.gov.uk**

There are no direct financial implications.

### **Legal Implications**

**Name & Title: Amanda Julian, Director of Law & Governance and Monitoring Officer**

**Tel & Email: 01277 312500/amanda.julian@brentwood.gov.uk**

The legal implications are within the body of the report.

### **Economic Implications**

**Name/Title: Phil Drane, Director of Strategic Planning**

**Tel/Email: 01277 312500/philip.drane@brentwood.gov.uk**

There are no direct implications for economic development.

### **Equality and Diversity Implications**

**Name/Title: Kim Anderson, Partnerships, Leisure & Funding Manager**

**Tel/Email: 01277 312500/kim.anderson@brentwood.gov.uk**

By having applying the principles of proportionality the Council will have due regard to its public centre equality duty under s149 in all decisions in makes when applying the principles within the Constitution.

**Other Implications** (where significant) – i.e. Health and Safety, Asset Management, Equality and Diversity, Risk Management, Section 17 – Crime & Disorder, Sustainability, ICT.

None

### **Background Papers**

None

This report was not available to issue on the date of publication and will follow in a supplementary agenda.

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<b>Committee(s):</b> Policy, Resources and Economic Development	<b>Date:</b> 13 July 2022
<b>Subject:</b> Seven Arches Investments Limited Quarterly report	<b>Wards Affected:</b> All
<b>Report of:</b> Jonathan Stephenson – Chief Executive	<b>Public/Exempt Appendix</b>
<b>Report Author/s:</b> Name: Jacqueline Van Mellaerts Telephone: 01277 312500 E-mail: Jacqueline.vanmellaerts@brentwood.gov.uk	<b>For Information</b>

## Summary

This report presents Seven Arches Investment Limited (SAIL) quarterly update to shareholders and provides management updates on the owned and managed commercial properties.

### Introduction and Background

1. At an Extraordinary Council meeting held on 21 March 2018 the creation of SAIL was approved and the shareholder’s powers delegated to the Policy, Projects and Resources Committee. Subsequently SAIL was registered with Companies House on 12<sup>th</sup> April 2018.
2. In accordance with the Shareholder’s Agreement, a quarterly management and business update is to be provided to PRED.

### Quarterly update

3. In accordance with the requirements of the Shareholder’s Agreement, SAIL’s Quarterly report is included at Appendix A.

### Reasons for Recommendation

4. It is a requirement of the Shareholder’s Agreement that a quarterly update is provided to PRED.

### References to Corporate Plan

5. This fits with the Council’s ‘Delivering an efficient and effective council’ priority, to explore new income generating ideas and opportunities.

## **Implications**

### **Financial Implications**

**Name & Title: Jacqueline Van Mellaerts, Director of Corporate Resources**

**Tel & Email: 01277 312500/jacqueline.vanmellaerts@brentwood.gov.uk**

Although this report has no direct financial implications. It should be noted that Seven Arches Investments Limited will provide a substantial income stream to Council which is included within its Medium-Term Financial Strategy.

SAIL will deliver these returns by following two streams of activity. Securing Investments opportunities commissioned through a specialist property consultancy; as well as launching a Joint Venture partnership for medium to longer term investment with potentially higher yield returns from year 6. Investments do carry a degree of risk and SAIL has reviewed its business plan to demonstrate its sustainability. The Business Plan identifies that annual investment plans are carried out; quarterly health checks will be presented to their shareholders and individual assets management plans are completed for each asset.

SAIL has in place a loan facility agreement of £60m with the Council, which was approved in October 2019. Currently the full £60 has been utilised. This returns to the shareholder (Brentwood Council) approximately £2.4m per annum by providing loans to SAIL at a commercial rate, as well as a further £406k for provision of services. SAIL also undertakes the lettings of residential properties and returns the income to the Council less SAIL's costs.

### **Legal Implications**

**Name & Title: Amanda Julian, Director of Law & Governance and Monitoring Officer**

**Tel & Email: 01277 312500/amanda.julian@brentwood.gov.uk**

The Council has power under s1(1) of the Localism Act 2011 to do anything which individuals may do provided it is not prohibited by legislation and subject to public law principles ('the general power of competence'). Further statutory powers exist to create and invest in SAIL and s1 of the Local Government Act 2003 permits the Council to borrow and lend. The recommendations set out in this report are in accordance with decisions previously taken by Council for establishing and implementing the business.

Members should be mindful of their fiduciary duty to ratepayers, when approving these investment(s). Local authorities have a fiduciary duty to act prudently with public monies entrusted to them and must establish that it has been given due and proper consideration in accordance with the normal public law principles.



Providing the additional funding required will require an additional loan agreement to be put in place for the Council to deploy funding into SAIL. Such agreement will need to reflect any conditions attached to the original funding source. It is recommended that these terms are agreed and included in any financial modelling ahead of the Council releasing further funding to SAIL and, in a form, approved by Legal Services.

The Council will have a requirement to meet its repayment terms to its own lenders, irrespective of the performance of the Council's lending to SAIL. The risks to the Council, as lender, are minimised by the terms of the loan agreements, the Council's oversight of the running of SAIL as its sole shareholder and governance measures implemented through the shareholder reserved matters.

### **Economic Implications**

**Name & Title: Phil Drane, Director of Planning & Economy**

**Tel & Email: 01277 312500/phil.drane@brentwood.gov.uk**

Commercial income supports the Council's services, including economic development activities. SAIL can also increase investment and opportunities into the borough either directly or indirectly.

### **Background papers**

None.

### **Appendices to this report**

Exempt Appendix A – SAIL March Quarter 22 – Management/Business Update

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## Appendix A

Appendix A contains exempt information and is therefore not publicly available.

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This report contains exempt information and is therefore not publicly available.

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## **Members Interests**

Members of the Council must declare any pecuniary or non-pecuniary interests and the nature of the interest at the beginning of an agenda item and that, on declaring a pecuniary interest, they are required to leave the Chamber.

- **What are pecuniary interests?**

A person's pecuniary interests are their business interests (for example their employment trade, profession, contracts, or any company with which they are associated) and wider financial interests they might have (for example trust funds, investments, and asset including land and property).

- **Do I have any disclosable pecuniary interests?**

You have a disclosable pecuniary interest if you, your spouse or civil partner, or a person you are living with as a spouse or civil partner have a disclosable pecuniary interest set out in the Council's Members' Code of Conduct.

- **What does having a disclosable pecuniary interest stop me doing?**

If you are present at a meeting of your council or authority, of its executive or any committee of the executive, or any committee, sub-committee, joint committee, or joint sub-committee of your authority, and you have a disclosable pecuniary interest relating to any business that is or will be considered at the meeting, you must not :

- participate in any discussion of the business at the meeting, of if you become aware of your disclosable pecuniary interest during the meeting participate further in any discussion of the business or,
- participate in any vote or further vote taken on the matter at the meeting.

These prohibitions apply to any form of participation, including speaking as a member of the public.

- **Other Pecuniary Interests**

Other Pecuniary Interests are also set out in the Members' Code of Conduct and apply only to you as a Member.

If you have an Other Pecuniary Interest in an item of business on the agenda then you must disclose that interest and withdraw from the room while that business is being considered

- **Non-Pecuniary Interests**

Non –pecuniary interests are set out in the Council's Code of Conduct and apply to you as a Member and also to relevant persons where the decision might reasonably be regarded as affecting their wellbeing.

A 'relevant person' is your spouse or civil partner, or a person you are living with as a spouse or civil partner

If you have a non-pecuniary interest in any business of the Authority and you are present at a meeting of the Authority at which the business is considered, you must disclose to that meeting the existence and nature of that interest whether or not such interest is registered on your Register of Interests or for which you have made a pending notification.



## **Policy, Resources and Economic Development Committee**

The committee shall consider all matters of policy and strategic importance to the Council including matters referred to it by other Committees and/or Chief Officers.

1. The function within the remit of the Policy, Resources and Economic Development Committee include all financial matters relating to the budget, (and for avoidance of doubt, being the superior Committee on all such matters including capital, revenue and the Housing Revenue Account (HRA) except where the law otherwise requires), and without prejudice to the generality of this, include the specific functions which are set out below.

### Policy

Generally to review and oversee the co-ordination and governance of all functions of the Council. To undertake and discharge any functions in relation to strategic policies including periodic reviews of the policy framework adopted by full Council from time to time except where required by law to be undertaken elsewhere.

### Finance

- 1) Financial Services
  - 2) Contracts, commissioning, procurement
  - 3) Legal services
  - 4) Health and safety at work (in so far as it relates to the Council as an employer)
  - 5) Corporate communications and media protocols
  - 6) Corporate and Democratic services
  - 7) Human resources
  - 8) Information Communication Technology
  - 9) Revenues and Benefits
  - 10) Customer Services
  - 11) Assets (strategically)
2. Overall responsibility for monitoring Council performance.
  3. To formulate and develop relevant corporate policy documents and strategies including the Corporate Plan.
  4. To formulate the budget proposals in accordance with the Budget and Policy Framework, including capital and revenue spending, and the Housing Revenue Account Business Plan (including rent setting for Council homes), in accordance with the Council's priorities and make recommendations to Council for approval.
  5. To formulate the Council's Borrowing and Investment Strategy and make recommendations to Council for approval.

6. To take decisions on spending within the annual budget to ensure delivery of the Council's priorities.
7. To approve the write off of any outstanding debt owed to the Council above the delegated limit of £5,000.
8. To determine capital grant applications.
9. To make recommendations on the allocation and use of resources to achieve the council's priorities.
10. To manage and monitor the Council approved budgets and allocation of resources.
11. To provide the lead on partnership working including the joint delivery of services.
12. To consider any staffing matters that are not delegated to Officers, such as proposals that are not contained within existing budgetary provision.
13. To strategically manage any lands or property of the council and provide strategic property advice relating to the council's Housing Stock and without prejudice to the generality of this, to specifically undertake the following-

#### The Council's Asset Management Plan

- (a) The acquisition and disposal of land and property and taking of leases, licenses, dedications and easements.
- (b) The granting variation renewal review management and termination of leases, licenses, dedications and easements.
- (c) Promoting the use of Council owned assets by the local community and other interested parties.
- (d) To manage any lands or property of the Council;
- (e) To include properties within the council's Asset Management Portfolio including Halls etc.
- (f) To take a strategic approach to asset management, ensuring that the use of all of the Council's Property assets achieves Value for Money and supports the achievement of the Council's corporate priorities.
- (g) To review the corporate Asset Management Plan annually.
- (h) The acquisition of land in advance of requirements for the benefit, improvement or development of the Borough.

- (i) Disposal of land surplus to the requirements of a council function.
  - (j) Appropriation of land surplus for the requirements of another Council function.
  - (k) Promote the use of Council owned assets by the local community and other interested parties where appropriate.
  - (l) Property and asset management, including acquisitions and disposals not included in the approved Asset Management Plan.
  - (m) To receive updates reports on the Asset Development Programme and the work of the Asset Development Programme and Project Board.
  - (n) To take a strategic approach to commercial activity, both existing and new, ensuring the Council realises revenue generation opportunities and supports the achievement of the Council's corporate priorities.
  - (o) To agree and monitor the governance arrangements for any commercial and/or partnership arrangement with the Council.
  - (p) Promoting a culture of entrepreneurialism and building the required skills and capacity.
  - (q) To consider and approve business cases and commercial business plans for commercial activity.
14. To consider and propose matters concerning the promotion of economic development throughout the Borough and the interface with countryside or regional economic development initiatives.

#### Economic Development

- (a) To lead, consider and propose matters concerning the promotion of economic development throughout the Borough and the interface with countryside or regional economic development initiatives.
- (b) To promote and encourage enterprise and investment in the Borough in order to maintain and sustain the economic wellbeing and regeneration of the area.
- (c) To develop climate where businesses and individuals can innovate, compete and contribute to the economic development and regeneration of the area; and excellence in local business.
- (d) To encourage the growth of existing businesses in the borough and access to the skills and training necessary to support them.

- (e) To develop and deliver a Borough wide initiative on apprenticeships.
- (f) To consider and determine matters relating to the promotion, maintenance and enhancement of the vitality and viability of shopping centres within the Borough.
- (g) To consult with the Chamber of Commerce, Federation of Small Businesses, residents and other interested third parties.
- (h) To maintain a special interest in promoting employment in the Borough.
- (i) To promote and encourage tourism and heritage.
- (j) Parking (off street parking provision in Council owned/leased off-street parking places).
- (k) Any matters relating to Crossrail.

15. To consider a report from the Monitoring Officer at the beginning of the Municipal Year, for the Committee to appoint the membership of the Constitution Working Group, in order for the Monitoring Officer to consult with such Members on the regular review of the Constitution documentation in accordance with Article 12 of the Constitution during the year.

16. To review and facilitate the transformation of delivery of services.

#### Transformation

- (a) To approve and facilitate the transformation of delivery of services.

#### Projects

- (a) To identify, monitor and oversee the implementation of those Corporate Projects that have been agreed by the committee to be major.

#### Scrutiny

- (a) To advise the Audit & Scrutiny Committee of any matters that require scrutiny in accordance with the Audit and Scrutiny Procedure Rules.
- (b) To receive requests and determine on matters that require scrutiny from any Committee in accordance with the Audit and Scrutiny Procedure Rules.

17. To consider any requests for sponsorship and use of the Council's Coats of Arms and logos.

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