

Brentwood Borough Council response to the Ingatestone and Fryerning Neighbourhood Plan 2020-2033 (Regulation 14 Consultation) October 2020

Principle

- Thank you for inviting Brentwood Borough Council to provide comments as part of the Ingatestone and Fryerning Neighbourhood Plan, Regulation 14 consultation. We support the steps that the parish council has made to proceed with preparation of a Neighbourhood Plan.
- 2. Please note that we have limited our response to high level comments addressing the strategic planning matters and neighbourhood planning process.

Neighbourhood Plan Policies

- 4. Brentwood Borough Council notes the proposal for Policy 1 (Housing), supports the housing allocation proposed in the Brentwood Local Development Plan (R22: Land Adjacent to the A12, Ingatestone). The requirement for 35% affordable housing is welcomed and complies with Local Plan policy HP05 (Affordable Housing). It is suggested that a minor change is required to amend the site number quoted in the Neighbourhood Plan from R21 to R22, to conform with current policy numbering in the Local Plan.
- 5. Similarly, Policy 4 (Economy) seeks to support the Local Plan employment allocation E08 (Land adjacent to A12 and Slip Road, Ingatestone). Changes to the Use Classes Order were introduced by the Government after the Neighbourhood Plan consultation period commenced. These changes should be reviewed and amendments made to the Neighbourhood Plan accordingly before it is submitted to the Council as part of Regulation 15 stage.
- 6. Policy 6 (Environment) is welcomed. The Council suggests reference is made to Natural England's *Nature Network Evidence Handbook*, and *Nature Networks a summary for practitioners*, which outline how applicants can achieve biodiversity net gains. Also, the Council recommend that reference be made to the Essex Coastal Recreational disturbance Avoidance & Mitigation Strategy (RAMS) as this has direct impacts within the parish.
- 7. The inclusion of wellbeing, recreation, and leisure facilities in the Neighbourhood Plan is welcomed. The Council suggests that the *Brentwood Built Facilities Strategy* and *Brentwood Leisure Strategy* be included under the evidence base for this policy. This

will ensure no indoor or outdoor recreational facilities are lost and that these conform with the local strategy and evidence for the borough.

Next Steps

8. As part of the Regulation 14 consultation the Council would have expected to have seen a Strategic Environmental Assessment and Habitats Regulations Assessment as part of the Neighbourhood Plan evidence base. This will need to be completed prior to submitting the Neighbourhood Plan to the Council under Regulation 15.

Conclusion

- 9. Brentwood Borough Council welcomes the opportunity to respond to the Ingatestone and Fryerning Neighbourhood Plan Regulation 14 consultation and appreciates the extension of time granted to allow a response to be considered and approved.
- 10. The Council looks forward to continuing to work positively with the Parish Council as the Neighbourhood Plan progresses through Regulation 15 and on to adoption.
