

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 20th 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.~~

- 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.

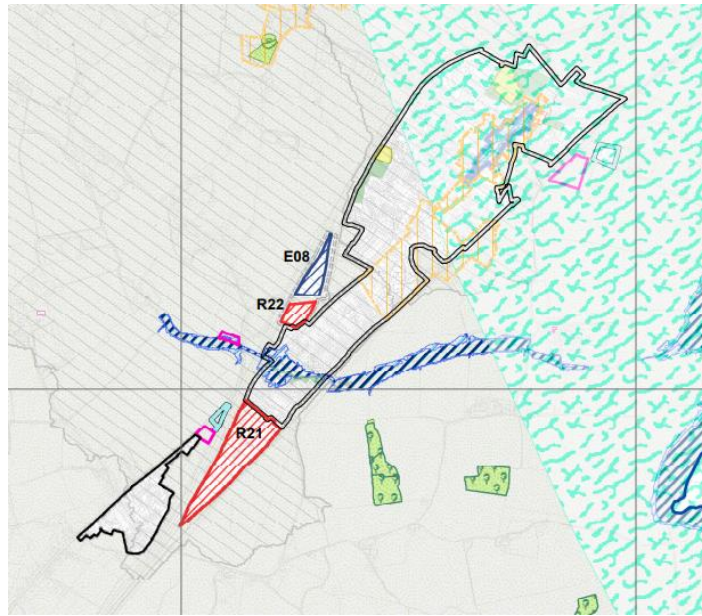


Image 1: Brentwood Local Plan Policies Map¹ extract of R21, R22, and E08



Image 2: Ingatestone & Fryerning Neighbourhood Plan Map extract from page 12

¹ 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 7th 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. Tthe 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.