

INDEPENDENT EXAMINATION OF THE INGATESTONE & FRYERNING

NEIGHBOURHOOD PLAN 2020-2033

EXAMINER: Derek Stebbing BA (Hons) DipEP MRTPI

Abigail Wood
Clerk to Ingatestone & Fryerning Parish Council

Andrea Pearson
Brentwood Borough Council

Examination Ref: 01/DAS/IFNP

20 April 2022

Dear Ms Wood and Ms Pearson

INGATESTONE & FRYERNING NEIGHBOURHOOD DEVELOPMENT PLAN EXAMINATION

Following the submission of the Ingatestone & Fryerning Neighbourhood Plan (the Plan) for examination, I would like to clarify several initial procedural matters. I also have a number of questions for Ingatestone & Fryerning Parish Council (the Qualifying Body) and Brentwood Borough Council (the Council), to which I would like to receive a written response(s) by **Friday 13 May 2022**.

1. Examination Documentation

I can confirm that I am satisfied that I have received the draft Plan and accompanying documentation, including the Basic Conditions Statement, the Consultation Statement, the Strategic Environmental Assessment Screening Opinion Report and the Regulation 16 representations, to enable me to undertake the examination.

Subject to my detailed assessment of the Plan, I have not at this initial stage identified any significant and obvious flaws that might lead me to advise that the examination should not proceed.

2. Site Visit

I will aim to carry out a site visit to the neighbourhood plan area during the week beginning 9 May 2022. The site visit will assist in my assessment of the draft Plan, including the issues identified in the representations.

The visit will be undertaken unaccompanied. It is very important that I am not approached to discuss any aspects of the Plan or the neighbourhood area, as this may be perceived to prejudice my independence and risk compromising the fairness of the examination process.

I may have some additional questions, following my site visit, which I will set out in writing should I require any further clarification.

3. Written Representations

At this stage, I consider the examination can be conducted solely by the written representations procedure, without the need for a hearing. However, I will reserve the option to convene a hearing

should a matter(s) come to light where I consider that a hearing is necessary to ensure the adequate examination of an issue, or to ensure that a person has a fair chance to put a case.

4. Further Clarification

From my initial assessment of the Plan and supporting documents, I have identified a number of matters where I require some additional information from the Council and the Qualifying Body.

I have several questions seeking further clarification, which I have set out in the Annex to this letter. I would be grateful if you can seek to provide a written response(s) by **Friday 13 May 2022**.

5. Examination Timetable

As you will be aware, the intention is to examine the Plan (including conduct of the site visit) with a view to providing a draft report (for 'fact checking') within 4-6 weeks of submission of the draft Plan. However, as I have raised several questions, I must provide you with sufficient opportunity to reply. Consequentially, the examination timetable will be extended. Please be assured that I will aim to mitigate any delay as far as is practicable. The IPe office team will seek to keep you updated on the anticipated delivery date of the draft report.

If you have any process questions related to the conduct of the examination, which you would like me to address, please do not hesitate to contact the office team in the first instance.

In the interests of transparency, may I prevail upon you to ensure that a copy of this letter is placed on the Qualifying Body and Council websites.

Thank you in advance for your assistance.

Your sincerely

Derek Stebbing

Examiner

ANNEX

From my initial reading of the Ingatestone & Fryerning Neighbourhood Plan 2020-2033 and the supporting evidence, I have the following questions for the Qualifying Body and the Council. I have requested the submission of responses **by Friday 13 May 2022**, though an earlier response would be much appreciated. All of the points set out below flow from the requirement to satisfy the Basic Conditions.

Question 1: Re. Brentwood Local Plan 2016-2033 (Pages 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.

Question 2: Re: 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.

Question 3: Re. 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.

Question 4 – Re. 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.