



**Notes of the Feering Parish Council Planning Working Group
held virtually on Wednesday 1 April 2026 at 10.00 am via Teams**

In Attendance: Cllr Pam Carlaw (joined at 10.15) Cllr Katherine Evans
Cllr Ian Giles Cllr J Maddison
Lisa Collins – Clerk

Member of Public 0

1 DISCUSSION OF THE FOLLOWING APPLICATIONS

a) BDC Draft Local Plan – Regulation 18 Consultation

Feering Parish Council's response to this consultation.

Comments by Councillors: No to Kings Dene! Should not be described as West of Feering which we would wish to see this removed. It should be stated as land in the North and West of Kelvedon and East of Rivenhall. In opening paragraph of the policy LPR 26 to remove Feering and replace with Rivenhall and point b) to remove Feering and replace with Rivenhall. Of the 5,600 homes allocation only 1,850 are due to be built in the planned period. There is 33 hectares of employment land which is not due to be delivered in the plan period. We will then have 1850 homes on the edge of Kelvedon adding to the traffic problems with no employment and we do not know what facilities they are going to deliver with the 1850 homes. No infrastructure. People are not travelling to London as they used to so being near a train station will not necessarily be a benefit. Premature to allocate such a large site when only 1850 are potentially going to be delivered in the planned period. Kelvedon Neighbourhood plan wishes to allocate the Deals and adjacent land off Station Road as a mixed-use site. KELV2218 and KELV2219. BDC have only designated it as car parking which is missing an opportunity to positively develop a site within close proximity to the station and in easy reach of the facilities. A bus garage is no longer a good use of this site. It is noted that the old Crittall's site in the centre of Silver End, which is a brownfield site, is not included in the Local Plan and this site should be brought forward as a central location in Silver End. If they brought those two, they would come close to the missing 1,850. We also feel it is a missed opportunity not to be developing any sites in the north end of Braintree district, particularly adjacent to Haverhill. There was originally a site in Sturmer original and in that part of the district you are next door to the A107 dual carriageway around the south side of Sturmer. Therefore you have the road and the facilities in Haverhill. The emphasis is on having developments near existing centres but a lot of people do their shopping on the internet. If it is approved the infrastructure needs to be delivered at the beginning and not after the plan period. Suggest that BDC local plan should look at the low-density housing estates to renovate to high density housing estates not just in Kelvedon / Feering but also across the district. BDC should support Town and Parish Councils to undertake Housing Survey needs to find out what exactly the actual need is for the rural villages.

Delegated response: Feering Parish Council wishes to submit the following comments in response to the Braintree District Council Draft Local Plan Regulation 18 Consultation, specifically in relation to Policy LPR 26 (Kings Dene).

Kings Dene Proposal – Feering Parish Council Objection

The Parish Council objects to the inclusion and description of the Kings Dene site.

Firstly, we strongly object to the site being described as “West of Feering”. This is inaccurate and misleading. The site lies to the north and west of Kelvedon and to the east of Rivenhall. Feering should not be referenced in the site description. We request that:

- The site description is amended to North and West of Kelvedon and East of Rivenhall.
- In the opening paragraph of Policy LPR 26, “Rivenhall” is added.
- In paragraph b), “Feering” is removed and replaced with “Rivenhall”.
- Any wider references describing the site as “West of Feering” are corrected accordingly.

Scale, Phasing and Prematurity

The allocation proposes 5,600 homes – this is the largest allocation by far in Braintree District. In 2023 Kelvedon with Feering ward consisted of about 2,400 households (BDC 2023 ward data) – so this allocation would more than double the number of homes. Yet only 1,850 homes of the proposed 5,600 homes are allocated for delivery within the plan period. In addition, 33 hectares of employment land is allocated – all for delivery after the plan period (ie after 2041). This is a very large area connecting onto an already over-capacity A12. By comparison, Phase 1 and 2 of the Horizon 120 sites are stated as occupying 32.1ha.

This would result in approximately 1,850 homes being constructed on the edge of Kelvedon, adding significant pressure to existing infrastructure and traffic networks, without the associated employment land or confirmed facilities being delivered alongside them. There is currently no clarity as to what infrastructure, community facilities, or services would accompany the initial phase of development.

It is considered premature to allocate such a substantial strategic site when the majority of it will not be delivered within the plan period. The front-loading of housing without employment provision risks creating an unsustainable, car-dependent development.

Furthermore, the assumption that proximity to a railway station will mitigate transport impacts is questionable. Patterns of commuting have changed significantly, and travel to London is no longer as dominant as it once was. Reliance on rail connectivity alone does not justify the scale of development proposed.

If the allocation is progressed, infrastructure must be delivered at the outset of development and not deferred beyond the plan period.

Infrastructure Capacity and Transport Concerns

The current infrastructure is not suitable for a development of this scale.

There is no clear or guaranteed delivery plan demonstrating that essential infrastructure will be provided before housing occupation, including:

- New primary and secondary school provision;
- Expanded GP and healthcare services;
- Road network upgrades;
- Improved and viable public transport provision;
- Additional sewage and wastewater treatment capacity.

Without firm, front-loaded commitments, the development would place unacceptable strain on existing services.

Traffic congestion is already a significant issue. The A12 junction at Kelvedon South experiences regular peak-time queues, with the High Street, London Road, and Feering Hill

frequently congested. Adding 1,850 homes – and potentially more beyond the plan period – would exacerbate these issues considerably.

Access to Kelvedon railway station is constrained by narrow roads and limited network capacity, further restricting the ability of the existing highway network to accommodate growth.

Critically, the consented A12 Widening and junction improvement scheme, which was identified as key strategic infrastructure to support growth along this corridor, is now not receiving funding. It is also not allocated for funding in RIS3 (Road Investment Strategy) covering 2026-2030. This A12 scheme would have relieved traffic and congestion through Feering and Kelvedon by providing an all-ways junction onto and off the A12 both to the north of Feering and to the south of Kelvedon. Without the A12 improvement there is no strategic highway capacity enhancement to support the scale of the development at Kings Dene.

Alternatives and Missed Opportunities

The Parish Council considers that more appropriate and sustainable opportunities exist elsewhere within the district:

- The Kelvedon Neighbourhood Plan identifies the 2.2ha Deals site, bus garage and adjacent land off Station Road / rear of the High Street (KELV2218 and KELV2219) as a mixed-use site. However, Braintree District Council has designated this land solely for car parking. This represents a missed opportunity to positively redevelop a sustainable site in close proximity to the railway station and existing facilities. The bus garage, with its narrow exit onto the High Street is not suited to large modern double-decker buses.
- The former Crittall's site in the Centre of Silver End, a brownfield site in a highly sustainable central location, is not included within the Draft Local Plan. This site should be brought forward for redevelopment.

If both of the above sites were progressed, they would make a significant contribution towards meeting the 1,850 dwellings proposed within the plan period, without relying on a large-scale strategic allocation.

It is also a missed opportunity that no meaningful allocations are proposed in the northern part of the district, particularly adjacent to Haverhill. Previous proposals included a site in Sturmer, adjacent to the A1071 dual carriageway around the south side of the settlement. This location benefits from strong road infrastructure and proximity to Haverhill's facilities and should be reconsidered.

Broader Strategy

The Draft Local Plan places emphasis on development near existing centres; however, retail and working patterns have evolved considerably and, with a significant proportion of shopping now undertaken online proximity to traditional centres does not automatically equate to sustainability.

We also urge the District Council to consider alternative strategies to meet housing need, including:

- Reviewing low-density post-war ex-council housing estates and garage blocks across the district (including but not limited to Kelvedon and Feering) to explore opportunities for sensitive densifications and regeneration.
- Supporting Town and Parish Councils in undertaking up-to-date Housing Needs Surveys to identify the genuine housing requirements of rural communities, ensuring that

development is driven by evidenced local need rather than strategic land availability alone.

Conclusion

In summary, Feering Parish Council objects to the Kings Dene allocation as currently drafted, the description of the site is inaccurate, the scale is premature, infrastructure delivery is uncertain, and more sustainable brownfield and smaller-scale opportunities have not been adequately prioritised.

We respectfully request that Policy LPR 26 being the Kings Dene allocation, is removed from the draft Local Plan.

b) **ESS/31/25/BTE – Bradwell Quarry, Church Road, Bradwell, Essex CM77 8EP**

Continuation of development permitted by ESS/12/20/BTE without compliance with conditions 2, 12, 17, 32, 33, 39, 47, 53, 60 and 62 to allow changes to: the internal haul road; contractors' compound; water and silt management; areas of biodiversity; and restoration and aftercare schemes. ESS/12/20/BTE was planning permission for "Extraction of 6.5 million tonnes of sand and gravel (from Site A7 as identified in the Essex Minerals Local Plan 2014) including the retention of the existing access onto the A120, the processing plant (including sand and gravel washing plant), office and weighbridge, ready mix concrete plant, bagging unit, DSM plant, water and silt management systems. In addition, extension of the internal haul road into Site A7 and access for private and support vehicles to the Site A7 contractors' compound via Woodhouse Lane and Cuthedge Lane. Restoration of Site A7 to agriculture and biodiversity (species rich grassland and wetland)."

Comments by Councillors: As Feering Parish Council object to the greenhouses we also object to the removal of the need to comply with the conditions in particular to the restoration and aftercare schemes. Significant redacted species. Refer to previous comments and object to the proposed.

Delegated response: Feering Parish Council wishes to submit the following comments in relation to this application.

As previously stated in our objection to application ESS/28/25/BTE, we object to the proposed industrial greenhouse development. For the same reasons we object to the removal of the need to comply with existing planning conditions, particularly those relating to restoration and aftercare schemes. These conditions are essential to ensure that the land is appropriately managed and restored, and that any environmental impacts are mitigated in the long term. Removing these requirements would be detrimental to the local environment and contrary to the public interest.

Additionally, in our submission dated 28 May 2025, we objected to the proposed extension of the internal haul road and the associated access for private and support vehicles to the contractors' compound via Woodhouse Lane and Cuthedge Lane (Site A7). These routes are rural in nature and are not designed to accommodate the type or volume of traffic that this development would generate. Increased usage by construction-related vehicles raises serious concerns regarding:

- Road safety for local residents and other road users;
- Potential damage to infrastructure and the local road network;
- The impact of increased heavy vehicle traffic on the character of the local rural area.

We continue to consider these concerns to be highly relevant. We strongly urge the planning authority ensure that access routes for construction and support traffic are restricted to the

A120 or other suitably designed routes, in order to protect our rural road network and safeguard the local community.

For these reasons, Feering Parish Council formally objects to application ESS/31/15/BTE as currently proposed.

- c) **ESS/28/25/BTE** – Land forming part of Rivenhall Airfield, Bradwell Quarry, Coggeshall Road, (A120) Braintree

Erection of low carbon greenhouses, alterations to the existing Rivenhall hangar to support a vertical farm, associated solar renewable energy generation and support enabling and infrastructure works.

Comments by Councillors: Water pressure within Feering anytime from 7 am until 7 pm goes down to hardly anything which it appears that the incinerator is over drawing on what they were originally allowed to. Water for the plants within the greenhouses will then make the situation even worse for those currently experiencing issues. The rights of Way, traffic management, biodiversity net gain, mitigation of harms to wildlife and the environment need to be better than they appear in the scheme. PRoW completely unsatisfactory. Cannot tell the environment of the PRoW plan because it has everything greyed out. The plan which shows the buildings and the fencing and structures is very difficult to see the PRoWs. Cannot tell the width or how close they are to the buildings. Not the right place to have the equivalent of 60 football pitches of greenhouses which will be visible to surrounding rural villages. It is a very large industrial greenhouse development in the countryside. Braintree District Council does not have any policy for employment in that area for Rivenhall. Surely although this is an Essex County Council planning application it should comply with BDC Local Plan Policies? Object as currently proposed as it is a very large development in the countryside. There is no policy for employment in that area of the BDC Local Plan. Adverse effect to wildlife and the environment and the issue of waste disposal where will that go. If the IWMP had retained its green composting facility it would have made sense. Anaerobic digestion being taken off site which should have been done as part of the IWMP. No allocation of employment land in the existing or reg 18 of the BDC Local Plan and draft Local Plan. Should this be taken into consideration. Support Rivenhall Parish Council's submission.

Delegated response: Feering Parish Council wishes to formally object to this planning application as currently proposed.

In principle, we are not against the proposal to improve food supply resilience by production in the UK, nevertheless at the proposed scale, the Parish Council considers this to be an inappropriate and excessive form of development in the countryside. We have significant concerns relating to infrastructure capacity, water supply, public rights of way, biodiversity, landscape impact and policy compliance.

1. Water Supply and Infrastructure Capacity

The introduction of extensive commercial glasshouses – requiring substantial and continuous water supply for irrigation – will put an added burden on water supplies. There is no clear evidence within the application demonstrating that existing supply capacity is sufficient, that abstraction levels will not further affect domestic users, or that upgrades to infrastructure will be secured and delivered prior to operation. This represents a significant and unacceptable risk to existing residents.

2. Scale and Industrialisation of the Countryside

The proposed development, equivalent in footprint to approximately 60 football pitches of glasshouses, constitutes a very large-scale industrial greenhouse complex in open countryside.

This scale of development is wholly out of character with its rural setting and will further industrialise the area surrounding Rivenhall and neighbouring villages. The cumulative impact, when considered alongside the incinerator chimney stack and visible plume — which can be seen on most days and nights despite previous assurances — would be substantial and harmful to the landscape.

The proposed glasshouses are vast in scale, significantly larger in footprint than the waste facility currently under construction and would dramatically intensify the industrial character of the area. This is not the appropriate location for development of this magnitude.

3. Public Rights of Way (PRoW)

The submitted PRoW information is wholly unsatisfactory. The plans are unclear and partially greyed out, making it impossible to properly assess the environment through which the routes would pass. On the building and fencing layout plans, it is extremely difficult to identify the precise location of the PRoWs. The width of the routes and their proximity to buildings, fencing and structures cannot be clearly determined.

Without clear, legible and detailed information, it is not possible to conclude that the amenity, safety and rural character of these routes will be preserved. The current submission fails to provide sufficient clarity to properly assess the impacts.

4. Biodiversity Net Gain and Environmental Harm

The Parish Council is not satisfied that biodiversity net gain and mitigation of harm to wildlife and the wider environment have been adequately demonstrated.

The development footprint is extensive and will inevitably result in significant habitat loss and fragmentation. The mitigation measures outlined do not appear proportionate to the scale of harm.

Concerns remain regarding waste disposal arising from the greenhouse operations. There is insufficient clarity regarding how green waste and other by-products will be managed, whether waste will be transported off-site and the associated impacts, and why anaerobic digestion is proposed off-site when this should have formed part of the originally consented integrated waste facility.

5. Questionable CHP Justification

The development is being promoted as a sustainable linked scheme utilising carbon dioxide and heat from the incinerator. However, it is understood that only a small proportion — potentially around 10% — of the incinerator's output would be utilised.

There is significant local concern that the greenhouse proposal is being advanced to present the incinerator as Combined Heat and Power (CHP) compliant, particularly given that key elements of the originally consented Integrated Waste Management Facility — including waste pre-processing, recycling, paper processing and food waste composting — have not been delivered.

What was described as an “integrated waste management facility” appears, in practice, to be a standalone incinerator. The greenhouses have no relevance to the extant consent for that facility, and the planning authority should carefully consider whether this proposal is being relied upon to retrospectively justify compliance.

6. Policy Conflict

Although this is an Essex County Council planning application, it is located within the administrative area of Braintree District Council and should therefore be considered against the adopted and emerging Local Plan policies.

There is no allocation of employment land in this location within either the adopted Local Plan or the emerging Regulation 18 Draft Local Plan. There is no identified policy basis for major employment or industrial-scale development in this part of Rivenhall.

The proposal therefore represents an unjustified and inappropriate industrial development in the countryside, contrary to the spatial strategy of the District.

Conclusion

For the reasons set out above – including inadequate water infrastructure and existing pressure failures, severe landscape and visual harm, unsatisfactory PROW documentation, insufficient biodiversity and environmental mitigation, concerns regarding waste management and CHP justification and clear conflict with local planning policy – Feering Parish Council objects to this application as currently proposed.

We respectfully request that Essex County Council refuses the application in its current form.

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UPDATE ON APPLICATIONS APPROVED / REFUSED

Applications Approved:

25/02887/TPO – 5 Willow Gardens

26/00108/HH – 1 Langley Farm Cottages

26/00195/HH – 28 Packe Close

Applications No Objections Raised:

26/00275/TPO – Bows Cottage, The Street

DATE OF NEXT MEETING

To be confirmed.