

Objection

Re - 18/00843/OUT | Outline application for the development 71 units with associated parking and amenity space | Hulleths Farm Hulleths Lane Pilgrims Hatch Essex CM15 9RX

Hulleths Lane

By way of introduction I believe a short description of Hulleths Lane would serve to set the scene on this historic byway. Hulleths Lane, Byway 15, is part of the Public Right of Way Network (PROW) and provides a vital access to and from rural countryside and settlements north of Brentwood via an extensive set of footpaths and bridleways. The lane is a popular local facility and is used on a frequent and regular basis by different segments of the public – walkers out for the day or just exercising their dogs, families with children just enjoying the surroundings or going further afield, runners and joggers, horse riders and off road cyclists. The lane was made safer for the public many years ago when it was constricted and barrier erected adjacent to the cottages thereby stopping vehicles moving along the length of the lane. There is no through traffic and it is limited as there are less than 10 dwelling along this stretch of the lane. It offers the public a safe, enjoyable, picturesque, open environment away from busy roads. The lane is not surfaced and offers a rural setting; fields surround the grade II farm houses and the Victorian red brick cottages. Looking northward on the left hand side the land had not been cultivated for many years and is often under water and is covered by reeds. Judging by the abundant bird life here I suspect this is also a haven for insects and amphibious animals. In summary:- Hulleths Lane is a valuable local amenity providing the public with a safe, pleasant rural setting away from intrusive vehicle movement. See photographs.



Illustration 0: Hulleths Lane

Location of proposed access road



Illustration 0: Hulleths Lane

Ongar Road

My second observation relates to Ongar Road and the junction with Coxtie Green Road and Orchard Lane. This is an extremely busy junction used by a mix of vehicles – passenger vehicles, HGV's, vans, emergency vehicles, funeral processions (going to and from the nearby crematorium), motor cyclists, cyclists, walkers and horse riders. It is also a noisy junction with frequent horn blasts from impatient drivers and emergency vehicles. Previous studies have shown that pollution levels, a contributory factor to early death, are already high on the Ongar Road. My rear garden backs onto this junction and over the years I have been witness increasing traffic and to many accidents including a vehicle crashing through my rear garden fence. I suspect not all these accidents are recorded since many are of a minor nature. Traffic jams and queuing is common particularly during school opening and closing times. Ongar Road is at capacity and is frequently grid locked; forcing drivers into side roads such as Orchard Lane.

National Planning Policy Framework (NPPF) published 27th March 2012

Section 9 Protecting the Green Belt

Paragraph 79 states - The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Paragraph 80 states Green Belt serves — to check the unrestricted sprawl of large built-up areas.

Paragraph 87 states - As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

Government Policy – Rights of Way Circular (1/09) Guidance for Local Authorities – version 2 October 2009

This circular gives advice to local authorities on recording, managing and maintaining, protecting and changing public rights of way.

Section 1.4 states - England's extensive network of public rights of way is a unique and valuable resource, which provides the opportunity to experience the immense variety of English landscape and the settlements within it. Rights of way are both a significant part of our heritage and a major recreational and transport resource. They enable people to get away from roads used mainly by motor vehicles and enjoy the beauty and tranquillity of large parts of the countryside to which they would not otherwise have access. Furthermore in section 1.6 it states - This advice and guidance sets out Defra's policy on public rights of way and its view of the law.

Section 7.2 states - The effect of development on a public right of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered.

Furthermore section 7.8 states - In considering potential revisions to an existing right of way that are necessary to accommodate the planned development, but which are acceptable to the public, any alternative alignment should avoid the use of estate roads for the purpose wherever possible and preference should be given to the use of made up estate paths through landscaped or open space areas away from vehicular traffic. (i.e. promoting the separation of traffic and public)

Brentwood District Council's Planning Policy

This policy is in line with Government Policy. In the section under Development in the Green Belt it states -

WITHIN THE GREEN BELT, AS DEFINED ON THE PROPOSALS MAP, PLANNING PERMISSION WILL NOT BE GIVEN, EXCEPT IN VERY SPECIAL CIRCUMSTANCES and

WHEN CONSIDERING PROPOSALS FOR DEVELOPMENT IN THE GREEN BELT, THE LOCAL PLANNING AUTHORITY WILL NEED TO BE SATISFIED THAT THEY DO NOT CONFLICT WITH THE PURPOSES OF INCLUDING LAND IN THE GREEN BELT AND DO NOT HARM THE OPENNESS OF THE GREEN BELT. THE PRECEDENT CREATED BY ALLOWING EVEN AN INDIVIDUALLY INNOCUOUS OR WELL-MERITED PROPOSAL WHICH CUMULATIVELY WOULD UNDERMINE GREEN BELT OBJECTIVES WILL BE TAKEN INTO ACCOUNT. ACCOUNT WILL ALSO BE TAKEN OF THE FOLLOWING:

- i) THE EFFECT OF PROPOSALS ON PUBLIC RIGHTS OF WAY
- ii) THE NEED TO PRESERVE OR ENHANCE EXISTING LANDSCAPE FEATURES
- iii) ANY BUILDING MUST BE SATISFACTORILY LOCATED IN RESPECT OF THE SURROUNDING LANDSCAPE AND ANY ADJOINING BUILDINGS.

Essex County Council Right of Way Improvement Plan (ROWIP)

RoWIPs are intended to be the means by which local highway authorities will identify improvements and management changes to be made to their local rights of way network in order to meet the Government's aim of better provision for walkers, cyclists, equestrians and people with mobility problems. Within the ROWIP document Essex County Council identifies the following issues and tasks -

Tackling congestion – to reduce the rate and incidence of congestion and its effect on residences and businesses in Essex.

Creating safer roads – to improve safety on the transport network and to enhance and promote a safer travelling environment

Promoting better air quality – to manage the impact of road and air transport on air pollution

whilst their objectives include:

To promote road safety

Reduce the number of killed and seriously injured road casualties

To improve quality of life and our environment

Increasing cycling and walking (enhancing passenger transport and accessibility)

Improve public rights of way (improving quality of life and the environment)

The Planning Application

Besides identifying that the development will be on green belt and showing pictures of the intended layout it seems to be light on detail and open to different interpretation and therefore misunderstanding. For example, it appears to show 3 entrances onto the Ongar Road – two existing ones from Hulleys Lane and one new entrance about 100 metre from the junction with Coxtie Green Road. If this is the situation what changes will there be to Hulleys Lane (e.g. safety bollards, lighting, surface upgrades). Will Hulleys Lane will be exposed to regular traffic passing both along and across it and therefore subject to more car parking along it? No estimates are provided

regarding the expected vehicle movement into and out of the development. I estimate that for the 71 dwellings there would be about 240 movements per work day into and out of this development onto the Ongar Road; the peak movement, several vehicles per minute, coinciding with rush hour and school start/finish times. (My assumptions are 71 dwellings with 1.5 vehicles per dwelling – $106.5 \text{ vehicles} \times 2 \text{ in/out per day} = 213 \text{ movements per day}$. Plus visitors, trade, post deliveries, rubbish collections – say 20 per day. Giving a total of over 243 movements per day.) My estimate may be inaccurate and therefore I would welcome a more informed view of vehicle movements from the proposers of this development.

Likewise there are no estimates of the demographics of the development even though for a development of this size it will have an impact on the local infrastructure – e.g. schools and doctors surgeries. Of the 71 dwellings 48 are 3 bedroomed and 23 four plus bedroomed. Assuming the occupancy rates are 4 people per dwelling of which 1 to 2 are of school age then about 280 people will need assigning to a surgery and about 100 school places found.

Objections

I object to the above application on the following grounds

- a) This development is harmful to the Green Belt and will result in loss of agricultural land and bio diversity, particularly the 'flooded/pond' area. It would totally change the character of the area from rural countryside to urban space. It is urban sprawl and will destroy forever the historic setting of Hulleys Lane. This development site is not on the Brentwood Local Development Plan recently issued for consultation. It is unacceptable that this application would increase the planned area of Green Belt land being built on in Brentwood District.
- b) This development is contrary to Government, Essex County Council and Brentwood planning policies on Green Belt and Public Rights of Way. It represents an encroachment of development into the countryside. The NPPF and Brentwood District policies state that no development should be on green belt unless there are very special circumstances. There are no special circumstances supporting this application.
- c) A development of this scale should also demonstrate sustainability; this development is not sustainable and conflicts with Essex County Council's ROWIP by adding extra pressure on Brentwood's stretched infrastructure. It will add to present traffic congestion, noise and pollution on the Ongar Road, Coxtie Green Road and surrounding side roads. Local medical facilities (e.g. doctors surgeries) are over crowded and school places scarce. There are no details on the sewage processing requirements. This year, as in previous years, sewage overflowed following the heavy rains. This is a significantly large development which should not be looked at in isolation but in the context of Brentwood infrastructure requirements.
- d) The access road to the development significantly changes the status of Hulleys Lane, Byway 15 and its construction is inconsistent with the protection of public rights as required under the Government Policy Right of Way Circular (1/09) Guidance for Local Authorities (see above).
- e) Frequent vehicle access to and from Ongar Road will increase the likelihood of accidents in and near the junction of Ongar Road, Coxtie Green Road and Orchard Lane.
- f) This development conflicts with Government policies and Essex CC ROWIP. There is a loss of amenity value for walkers, cyclists and horse riders using Hulleys Lane. The resultant traffic flows across and along the Lane will have an adverse impact on public safety, freedom of movement and enjoyment. Experience shows drivers generally assume priority over non vehicle movement. Visually the Lane will be impaired by the frequent movement of vehicles and increased parking in the lane itself.

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