

Herongate and Ingrave Parish Council



Clerk to the Council:
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28th September 2018

The Planning Inspectorate
Room3/209
Eagle Wing
Temple Quay House
2 The Square
Temple Quay
Bristol, BS1 6PN

Dear Sir/Madam

Re: Appeal reference H1515/W/18/3209204

Herongate and Ingrave Parish Council would like to object to the appeal on the following grounds:

1. The proposal is contrary to the provisions of the Framework and Policies GB1 and GB2 of the Brentwood Replacement Local plan as it represents inappropriate development in the Green Belt. The existing buildings were previously agricultural and then in use as a sporting facility. Such buildings represent allowable building in Green Belt under the National Planning Policy Framework paragraph 89. The developers claim that this application represents "limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land)". The Parish Council would argue that this is not the case. The original reason for building on this area of Green Belt was to allow agricultural and sporting use - not to build houses. This application represents further incursion into the Green Belt than the existing buildings and would have a greater impact on the openness of the Green Belt which is against paragraph 79 of the National Planning Policy Framework.

Furthermore, there is great concern that, if this application is granted, it will establish a precedent and other agricultural buildings in the area will also be re-developed into housing. This will lead to the in-filling of the Green Belt and to the merging of Herongate and Ingrave with West Horndon. The Green Belt was created in order to stop such merging (NPPF para 80) and that is why any further incursion to the Green Belt must be opposed.

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2. The amount of affordable housing is below the Council's requirement and the only justification given is that of "insufficient profit". No actual figures have been provided to support this and as such the proposal is contrary to Policy H9 of the Brentwood Replacement Local Plan and the provisions of the National Planning Policy Framework 2012.

3. The developers have made a new application which is in essence identical to this one (application ref: 18/01291/FUL). We note that ECC SuDS and the Environment Agency have both raised holds on the new application on grounds of flood risk. The Environment Agency have also stated that the Flood Risk Assessment submitted by the developers is inadequate and does not comply with the requirements set out in the Planning Practice Guidance, Flood Risk and Coastal Change, Reference ID: 7-030-20140306.

4. There is a lack of doctor's surgeries, school places and daycare places in the area which the addition of 30 new homes will exacerbate. The Schools, Children Families Directorate commented "I would be grateful if the lack of surplus childcare, education and school transport provision in the area to accommodate the proposed new homes can be noted as an additional reason for refusal" which supports numerous objections from residents on these grounds.

5. Residents feel very strongly that there was a lack of public consultation on this application. Unfortunately, the Parish Council did not alert residents to the application in time for them to be able to register their objections to it. When the second application came in the Parish Council made residents aware of its existence and so far 37 objections have been made by local residents (in comparison to just 14 on this application). The objections listed above represent not only the objections of the parish council but also of the local residents which they feel will not otherwise be heard.

Yours faithfully,

Stephanie Robinson
Clerk to Herongate and Ingrave Parish Council