



Consultation Response – Part Two

Billericay Focus
23rd March 2016

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1. Introduction

This is the second part of Billericay Action Group's response to the 2016 Draft Local Plan and focuses almost entirely on Billericay whereas the first response had a borough and regional focus.

2. Allocations & Landscape Protection Area

2.1. Landscape Protection Area

BAG supports the Landscape Protection Area proposed for East Billericay and will, if we can, work with BBC and the public to find ways to deliver tangible benefits from the policy.

We would suggest considering adding the following areas to the LPA.

- The small part of Forty Acre Plantation (Ancient Woodland\LoWS) that's within the borough, together with a buffer area to the west of Goatsmoor Lane. (see 2.2, below)
- Break Egg Hill plotlands (see 2.11)

The caveat to this support is regarding NE2.2 which is not supported in its current wording. We would like to see the following phrase removed "unless the loss or harm can be fully addressed by appropriate mitigation and/or compensatory measures which can be secured to the satisfaction of the Council."

2.2. H19 – Potash Road

The Billericay Action Group objects to H19.

The land north of Potash Road is an important part of the wildlife corridor between Queens Park Country Park and Forty Acre Plantation Wood, a corridor containing valuable woodland, scrub and grassland. The corridor is valuable for a number of species, notably Dormice. Forty Acre Plantation is an ancient woodland and designated wildlife site. A significant buffer would be required to protect the ecological value of the wood and a corridor maintained between Queens Park and Forty Acre Plantation Wood.

Also, the western part of the development is on Basildon's boundary with Chelmsford. If Chelmsford were tempted to build up to this boundary – in the way Brentwood propose at Dunton - then Billericay would grow still further and there would be a risk of coalescence between Basildon/Billericay and Chelmsford/Stock.

Development of the eastern section would adversely impact the rural character of Goatsmoor Lane. This road's setting and low traffic levels make it popular for leisure pursuits such as walking, cycling and horse riding. Development at the western section would result in a loss of amenity for the people who graze their horses there.

The eastern section is thought to be an important part of the site of the Battle of Billericay in 1381. The battle is thought of as being in Norsey Wood but the likely location of the main action is here, adjacent to Norsey.

The sites making up H19 are owned by several landowners, some of whom have stated that their land is not available.

The site is listed as being of 20 dph density, which is very low and indicative of executive homes. An analysis of the size of the site shows that the actual density is less than half of that - indicating that land is being taken out of Green Belt to facilitate the building of land hungry homes for the very wealthy. This complaint should not be misconstrued as suggesting more homes on the site.

The development is far from Billericay High Street, the station and other local services. Development here would therefore be less sustainable by virtue of its residents reliance on cars, and would further increase pressure on already congested parts of the highways network, particularly along Stock Road, Stock Road/Radford Way Roundabout, the Norsey Road/Stock Road /Mountnessing Road junction and the High Street. We do not believe that highways mitigation in the South of the Town will ease congestion in these parts of town.

Billericay Action Group expects that Basildon Council will give weight to the expertise and comments of environmental groups, including the Essex Wildlife Trust when considering this policy.

2.3. H20 – Tye Common Road

Billericay Action Group objects to policy H20, does not agree with conclusion of the green belt review, has concerns about the impact of policy H20 on the visual amenity of Key Viewpoint 27 - as identified in the Landscape Character Assessment - increased congestion at Tye Common Road and London Road, and surface water flooding.

H20 falls within site 5 which is in area 9 and a small part of area 8 of the Greenbelt Review 2015, p104. Area 9 is considered only to partly meet purposes 1, 2 and 3 of the greenbelt. However, area 9 covers a diverse area - arable farmland with Curd and Kingsmans Farms on one side (H20) and the Blunts Wall (H21) area which contains the sporting facilities on the other. Had they been considered separately, it is likely that the Greenbelt review would have come to a different conclusion about site 5 and considered that it meets purposes 3, 1 and 4 of the greenbelt:

"3 - To assist in safeguarding the countryside from encroachment; *There are roads throughout the area leading to the sports facilities and farms. There is some light industry to the north of the area and some residential properties in the area. The area can be viewed from the roads or is open space and apart from a small area of grassland adjacent to the Billericay Town FC football ground, the area is relatively open in character. The majority of land uses are compatible with the countryside therefore this area partly contributes to this purpose."* (Greenbelt Review, 2015, page 106.)

The road and sporting facilities listed above are NOT in site 5 - they are across the road at Blunts Wall. There are NO roads crossing site 5, it is arable farmland and the only buildings are farm buildings (Kingsmans Farm and Curds Farm.) As farming is compatible with the countryside, then we would conclude that site 5 fully meets this purpose. The farm buildings cannot be considered to be encroaching in the countryside as farming is compatible with the countryside:

"Land at Curds Farm, Tye Common Road, Billericay

Description of site:

Rectangular shaped site located on the west side of Tye Common Road in a semi-rural setting. The land comprises several farm buildings, a farm bungalow, two large oak trees (which appear to mark the original boundary of Tye Common from the 1777 map), hedgerows and open grassland. Further farm/council depot buildings lie to the south, residential development to the east, a single dwelling to the north and open farmland beyond this, along the western side of Tye Common Road. Several pigs were being reared in the outbuildings and chickens were in a run along side at the time of a site visit." (Housing and Economic Land Availability Assessment (HELAA) Review 2015, Volume 3 – Appendix C November 2015, Site SS0329, page 673.)

"Land at Kingsmans Farm, Billericay

Description of site:

The site is a large parcel of land consisting of farm buildings at Kingsmans Farm and agricultural fields. Tye Common Road forms the eastern and southern boundaries of the site, drainage ditches frame the western boundaries, Elmshaws Farm is also at the southern boundary and Blunts Wall Road forms the northern boundary beyond which are sports grounds and recreational facilities. The Settlement of Tye Common is adjacent to the site and agricultural fields lie to the west. There are two drainage ditches traversing the site west - east."

(Housing and Economic Land Availability Assessment (HELAA) Review 2015, Volume 3 – Appendix C November 2015, Site SS0532, page 1039.)"

Site 5 could also be considered to meet purpose 1 of the greenbelt:

"1 - To check unrestricted sprawl of large built up areas. The area is surrounded by the built up area of Billericay, to the east and north with the urban/rural boundary defined by the roads and property boundaries. There are a range of outdoor sports facilities, including football, cricket and tennis within the area. There are also associated sports buildings, such as changing rooms and social club areas. The area to the north contains light industry and a residential property which could be classed as sprawl from the urban area of Billericay."

Apart from two farms, which are compatible with the functions of the country side, the built up area STOPS at site 5's boundary with Blunts Wall Road and is otherwise an open landscape of arable farmland. Site 5, therefore, has been highly successful in 'checking the unrestricted sprawl' of large built up areas and fully meets this purpose.

In addition, the sporting facilities listed above should not be considered to be a part of the large built up area as policy GB11 states that outdoor sports are a positive use of the greenbelt.

This is clearly recognised in the Greenbelt Landscape Capacity Assessment rating, as the two areas are considered separately and site 5 is area 9A (Basildon Outline Landscape Appraisals of Potential Strategic Development Sites, page 58).

In the landscape appraisal, page 58, area 9A has a "low relative landscape capacity rating because of the openness to public view from nearby roads, views from adjacent residential properties", and "most of site 5 is considered to be of higher sensitivity due to its openness to public view in long distance views from the West and strong character and condition as an agricultural landscape."

The eastern edge, that comprises H20 however, is considered to be less sensitive by virtue of its relationship with the urban edge of Billericay, presumably at Blunts Wall. This is tenuous as it is separated by roads and, as with the rest of site 5, it provides long distance views across the countryside and agricultural landscape. The landscape appraisal seems to give less weight to views from within Billericay looking out than it does to those looking in.

Furthermore, the view out from Tye Common Road is listed as being a key viewpoint in the Landscape and Greenbelt Character Study, Volume One Landscape Character Assessment of Basildon Borough, The Landscape Partnership 2014, page 25/26. In this respect it could be considered to be meeting the purpose 4 of the greenbelt (at least in part), by preserving the setting of the town.

"Viewpoint 27; Tye Common Road. Open view across arable farmland looking west from Tye Common Road. The tops of high rise buildings in Brentwood can be seen in the distance to the right of the view and Bluntswall and James's Woods form a wooded skyline to the left."

Development here would compromise this key viewpoint across the landscape and therefore be detrimental to the quality of the visual amenity of the landscape. This is at odds with policy NE6 (1) that seeks development proposals that enhance the quality and visual amenity of the landscape.

The HELAA shows that H20 is susceptible to surface water flooding. During periods of heavy rain, the water runs down London Road, turns left into Tye Common Road and continues its journey from there. Occasionally, the drains can't cope and overflow, and at least one house has experienced flooding as a result. How can we be assured that new drainage systems will be better than the existing ones?

The proposed relief route through H21 and H20 has the potential to become a rat run and produce yet another busy junction along London Road - particularly where it coincides with the road into H22. This would probably need to be a roundabout/ traffic lighted junction. So in a short piece of road we will have three busy junctions. This will also require a new junction with Tye Common Road in close proximity to the junction where the Frithwood section of the route meets Tye Common Road, further impeding traffic passing through from the direction of the A127 and A128 (Little Burstead and Herongate).

2.4. H21 – South of London Road

BAG objects to H21, noting that there are no HELAA submissions for all of the sites included in the policy map for H21 - one of which is the tennis club.

There is also no mention of the tennis club in the policy for H21 but it is mentioned in the landscape appraisal, page 298, ("*the tennis club may need to relocate in the close proximity*") and also in the sustainability report for the site ("*the club may be lost*"). If the club was developed then it would need to be relocated as The Basildon Playing Pitch Strategy Review 2011 - Technical Addendum - page 28, predicts a shortfall of provision by between 144-154 courts in 2021 and 150-164 by 2031. If the tennis club were to be relocated, then it would need to be in the close proximity to avoid increasing car journeys and this would likely result in the further loss of greenbelt land.

There is also no mention within H21 of the route of the road from H20 and how this would impact on the football, tennis or cricket clubs.

The road through H21 and H20 has the potential to become a rat run and produce yet another busy junction along London Road - particularly where it coincides with the road into H22. This would likely need to be a roundabout/ traffic lighted junction. So in a short piece of road we will have three busy junctions.

2.5. H22 – Mountnessing Road

The Billericay Action Group objects to policy H22 (Land West of Mountnessing Road, Billericay) as it contravenes policies GB1 and NE6(1), will result in the loss of visual and recreational amenity, would risk exacerbating sewage capacity issues and flooding for residents living along the railway line at the end of The Avenue and have a negative impact on the highways.

In including H22 in the plan, the council has ignored the findings of its own greenbelt review. H22 encompasses most of area 7 in the Basildon Council Greenbelt Review 2015 which concludes on page 95, that:

"Recommendations: This area contributes to checking unrestricted sprawl of large built up areas and safeguarding the countryside from encroachment and should remain as Green Belt."

According to this then, development within this site would contribute to unrestricted sprawl of the large built area and encroach into the countryside. It is perverse, therefore, to conclude in the Basildon Council Site Allocation Appraisals for the Basildon Borough Draft Local Plan, December 2015, page 8, that developing this site would not change its contribution to the greenbelt.

The NPPF is clear that protection is afforded to the greenbelt and guidance at: <http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/stage-5-final-evidence-base/> states that:

"Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs.

However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so

doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need."

Revision date: 06 10 2014

Related policy

National Planning Policy Framework

- *Paragraph 159*

Paragraph: 029 Reference ID: 3-029-20140306

It also goes on to advise that:

"Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt."

Revision date: 06 10 2014 See revisions

Paragraph: 035 Reference ID: 3-035-20140306

The Landscape Appraisal of the site makes NO reference to the recommendation of the Greenbelt Review 2015. It recognises, however, that the site provides "*long distance views across West Billericay Wooded Farmlands towards Brentwood*" and that there are "*framed views through breaks in the houses from Mountnessing Road, Station Road and Beaufort Road.*" (*Basildon Council Outline Landscape Appraisals of Potential Strategic Development Sites, page 82*).

Furthermore, the view out from Mountnessing Road is listed as being a key viewpoint in the Landscape and Greenbelt Character Study, Volume One Landscape Character Assessment of Basildon Borough, The Landscape Partnership 2014, page 25. In this respect it could be considered to also be meeting purpose 4 of the greenbelt, by preserving the setting of the town.

"Viewpoint 26; Mountnessing Road *Framed view from Mountnessing Road looking west between residential properties to Grange Farm. The view extends across farmland into the Brentwood Borough. The railway embankment forms a linear feature to the right of the view."*

Development here would compromise this key viewpoint across the landscape and therefore be detrimental to the quality of the visual amenity of the landscape. This is at odds with policy NE6 (1) that seeks development proposals that enhance the quality and visual amenity of the landscape.

These wonderful, sweeping views contribute to the setting and rural character of Billericay and yet less weight appears to be given to them than to the views looking in towards Billericay from the A129 and Havering Grove, when considering the sensitivity and landscape capacity of the site.

The proposed development area also extends and sprawls into the countryside beyond the Western boundary line of Courtlands, which is at the southern end of the proposed site and would be clearly visible from the A129.

Residents along the railway line, at the end of The Avenue have told us that they have been flooded at least 12 times since 2009 as a result of the sewer overflowing during periods of heavy rain. Capacity issues are acknowledged

within the Infrastructure Delivery Plan, Living Document, December 2015, Pages 9 and 10:

"4.3.6 The foul (or used water) flows from future growth will have an impact on the existing foul sewerage network. The foul infrastructure requirements will be dependent on the location, size and phasing of the development. All sites will require a local connection to the existing sewerage network which may include network upgrades. However, the need for potential upgrades should not be seen as an objection to the allocation of these sites, as Anglian Water can work with the Borough Council to ensure development is phased correctly." (page 9)

"4.3.7 The Environment Agency (EA) has provided comments on the strategic sites, and stated that the level of development allocated in the Billericay area would be extremely close to the available capacity at this Water Recycling Centre. However, it may be possible to connect some of the development to other sewage catchments and there is the possibility of expanding this treatment facility, but investment would be required."

Development at this site should not be considered unless it is possible to resolve both the existing issues and mitigate for the impact of further development in this area.

H22 is accessible to residents by virtue of its public footpath and its development would result in the loss of a valued amenity - particularly for those who walk their dogs there - and the openness of the landscape in this area.

Furthermore, it is correctly recognised in the plan that without demolishing houses, the only suitable access for H22 would be from London Road, linking up to the proposed south/south west relief route (policy TS2(h)) at its junction with London Road. We would question the sustainability of a single access point for a development of 280 houses and this would also result in an additional road junction for the London Road - leading to there being three major junctions within a distance of roughly 600 yards.

In conjunction with Policies H21, H20 and H23, H22 relies on policy TS2 (h), the South/South west relief route to mitigate issues at Sun Corner which is currently over capacity and would be exacerbated by any increase in traffic caused by the new developments. The phasing in the delivery plan however, shows that whilst H22 is phased for 2015-2020 (100 houses) and 2020-2025 (180 houses) the relief route would potentially not be completed until 2025-2034 when policy H23 is delivered.

2.6. H23 – Frithwood Lane

Billericay Action Group objects to policy H23 (Land East of Frithwood Lane) as this policy ignores the findings of the greenbelt review and landscape capacity appraisals and would, therefore, constitute inappropriate development in the greenbelt. This makes it incompatible with policy GB1. It would also will be potentially damaging to Frith Wood Ancient woodland and local wildlife site and have a negative impact on highways.

The council has ignored the recommendations of its own greenbelt review and landscape capacity study. H23 forms a part of area 12 in the Basildon Council Greenbelt Review 2015 which concludes on page 129, that:

"Recommendations: *This area contributes to preserving the setting and special character of historic towns and should remain as Green Belt.*

The area could form part of the wider enhancement scheme with areas 10 and 11 and the footpaths could be more enclosed to strengthen field boundaries."

According to this then, development in this area would compromise the preservation of the setting and special historic character of the town. The review also states on page 129, that:

"The area is adjacent to the built up town of Billericay in the north. The urban/rural boundary is defined by permanent features such as roads and the rear of residential gardens which have helped to prevent urban sprawl."

Therefore, development adjacent to this boundary, is unrestricted sprawl of the large urban area and encroachment into the countryside. It seems perverse to conclude in the Basildon Council Site Allocation Appraisals for the Basildon Borough Draft Local Plan, December 2015, page 8, that policy H23 would not change its contribution to the greenbelt.

The NPPF is clear that protection is afforded to the greenbelt and guidance at: <http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/stage-5-final-evidence-base/> states that:

"Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs.

However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need."

Revision date: 06 10 2014

Related policy

National Planning Policy Framework • Paragraph 159

Paragraph: 029 Reference ID: 3-029-20140306

It also goes on to advise that:

"Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special

circumstances” justifying inappropriate development on a site within the Green Belt.” Revision date: 06 10 2014 See revisions

Paragraph: 035 Reference ID: 3-035-20140306

Furthermore area 12, of which H23 forms a part, is home to Frith Wood which is an Ancient Woodland, LoWS, BAP and TPO and Laindon Common LoWS and BAP. The policy map shows that policy H23 butts up to the boundary of the wood. The Billericay Action Group would not support any development that would prove detrimental to the Ancient Woodland and its surrounding environment.

Billericay Action Group expects that Basildon Council will give weight to the expertise and comments of environmental groups, including the Essex Wildlife Trust when considering this policy.

The Basildon Outline landscape Appraisals of Strategic Development Sites document, page 79, makes no reference to the recommendation of the Greenbelt review 2015. It acknowledges that when split into two areas - 12A and 12B - area 12 has low (12A) or no/very low (12B) relative landscape capacity.

H23 is chosen because it is considered to have a slightly lower sensitivity than the rest of the area as it is directly associated with Scrub Rise and Frithwood Lane. However, Frith Wood is considered to be a sensitive area of the site and land adjacent to it is considered to be a higher sensitivity than H23. Given that H23 is adjacent to Frith Wood at its southern end, it should be awarded the same level of sensitivity as the rest of area 12.

The road which passes through H23 will form a part of the south/south west relief route policy TS2 (h). This would require Frithwood Lane to be widened and result in a loss of amenity to existing residents who currently live on a quiet country lane and will find themselves living on a considerably busier ‘by-pass’. There is no mention in the highways modelling or highways topic of the impact on the junctions with Frithwood Lane, Scrubs Rise, Tye Common Road and the new junction with policy H20. Tye Common Road is already a busy road at peak times and is used as a cut through for people travelling to and from the A127, Basildon, Billericay, Brentwood and Chelmsford. The addition of this junction will interrupt the flow of this traffic along this road.

This busy relief route will also pass in close proximity to the Ancient Woodland and the noise and pollution may prove to be detrimental.

Other points are:

- Buffers
 - The site includes a high pressure gas pipeline. It is recommended that there should be a 60 metre buffer on either side of these.
 - It is recommended that there are buffers of at least 100 metres around Ancient Woodlands\LoWS.
- The availability of the site is dubious. The whole area was put forward as one site, despite the western part being under separate ownership. We doubt that the western part is actually available.

- The loss of a particularly accessible area of countryside is particularly regrettable.

2.7. H24 – Windmill Heights

The Billericay Action Group objects to policy H24 (Land off Windmill Heights, Billericay).

H24 is a part of area 14 in the Basildon Council Greenbelt Review 2015 which concludes on page 134, that:

"Recommendation: This area make a partial contribution to checking unrestricted sprawl of large built up areas and safeguarding the countryside from encroachment. The area to the north where existing residential development exists should have slight Green Belt boundary amendments made to remove it from the Green Belt. This is because it forms part of the urban settlement and therefore does not contribute to the Green Belt purposes."

According to this then, development within this site would further contribute to unrestricted sprawl of the large built area and further encroach into the countryside.

The NPPF is clear that protection is afforded to the greenbelt and guidance at: <http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/stage-5-final-evidence-base/> states that:

"Local authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs.

However, assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need."

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Revision date: 06 10 2014 See revisions

Paragraph: 035 Reference ID: 3-035-20140306

Greenbelt Area 14 (in which H24 is located) is considered along with area 15 as site 18 in the the Landscape Appraisal. The appraisal makes NO reference to the recommendation of the Greenbelt Review 2015. It states, however, that "*Both areas were assessed as having a No/Very Low relative landscape capacity rating. This was particularly due to the elevated and prominently sloping landform visible in the wider landscape and the role the landscape plays in preventing coalescence between Noak Hill, Little Burstead, Great Burstead and South Green. The openness to public view from Kennel Lane, the A176 and local public footpaths also contributed to the Very Low landscape capacity.*" (*Basildon Council Outline Landscape Appraisals of Potential Strategic Development Sites*, page 187).

No Highways modelling has been carried out for this part of Billericay and it is possible that development here will contribute to further congestion on the surrounding roads.

2.8. H25 – Kennel Lane

The Billericay Action Group objects to policy H25 (Land off kennel lane, Billericay) as it contravenes policy GB1, of the local plan and is it odds with the protection afforded to the greenbelt in the NPPF.

In including H25 in the plan, the council has ignored the findings of it's own greenbelt review. H25 is a part of area 15 in the Basildon Council Greenbelt Review 2015 which concludes on page 139, that:

"Recommendation: *This area contributes to checking unrestricted sprawl of large built up areas and safeguarding the countryside from encroachment. It should remain as Green Belt. The area would benefit more from enhancement through strengthening hedgerows and field boundaries and enhancing the PRoW. This would provide opportunity to enhance the existing biodiversity, wildlife and ecology in the area and promote the area for recreation.*

According to this then, development within this site would contribute to unrestricted sprawl of the large built area and encroach into the countryside.

The NPPF is clear that protection is afforded to the greenbelt and guidance at: <http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/stage-5-final-evidence-base/> states that:

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Revision date: 06 10 2014 See revisions

Paragraph: 035 Reference ID: 3-035-20140306

Greenbelt Area 15 (in which H25 is located) is considered along with area 14 as site 18 in the the Landscape Appraisal. The appraisal makes NO reference to the recommendation of the Greenbelt Review 2015. It states, however, that *"Both areas were assessed as having a No/Very Low relative landscape capacity rating. This was particularly due to the elevated and prominently sloping landform visible in the wider landscape and the role the landscape plays in preventing coalescence between Noak Hill, Little Burstead, Great Burstead and South Green. The openness to public view from Kennel Lane, the A176 and local public footpaths also contributed to the Very Low landscape capacity."* (*Basildon Council Outline Landscape Appraisals of Potential Strategic Development Sites, page 187*).

No Highways modelling has been carried out for this part of Billericay and it is possible that development here will contribute to further congestion on the surrounding roads.

Flooding is a particular concern on this site, esp H25B with particular regard to the watercourses rising to the north-west. Residents describe the problems with the watercourse and also surface run off sweeping over the road and causing significant problems on that side.

Such was the concern that a temporary reservoir was proposed upstream in order to facilitate works to mitigate the problems. However the landowner where the reservoir was to be placed pulled out of the scheme.

Additionally, the site may be of significant local ecological value so a programme of appropriate surveys should be carried out. There is a footpath on the north side of H25A so a development would cause a loss of amenity.

2.9. H26 – Greens Farm Lane

The Billericay Action group objects to this policy as it ignores the findings of the greenbelt review and landscape capacity appraisals and would, therefore, constitute inappropriate development in the greenbelt.

Given that Area 29, the land within which H26a and b are located, was considered worthy of protection in the Basildon Borough Greenbelt Study October 2013, p.46:

"Eastern Billericay 7.3 Sub-areas 2, 29 and 30, which incorporate Norsey Woods and Mill Meadows should be retained and given significant protection.

The rural nature of the sub-areas and their green linkages to the open countryside in the west to Mill Meadows in the east should be taken into account. All three sub-areas provide educational opportunities that should be promoted. The sub-area's Listed Buildings, the protected species including the buffer zones for the SSSI, BAP Area and LoWS as well as surface water flooding, ground water vulnerability, sewage works and any archaeological deposits within the sub-areas should all be respected. The historic field boundary patterns should be protected and enhanced through reinstatement wherever appropriate."

the recommendation of the Greenbelt Review 2015, page 223:

"Recommendation: This area contributes to checking unrestricted sprawl of large built up areas and safeguarding the countryside from encroachment. It should remain as Green Belt."

and the conclusion of the Landscape Capacity Study that area 29 has no/very low capacity for development (Basildon Council Site Allocation Appraisals for the Basildon Borough Draft Local Plan, December 2015, page 69), Billericay Action Group was surprised to find the inclusion of both H26a and b in the local plan, 2016.

The NPPF is clear that protection is afforded to the greenbelt and guidance at: <http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/stage-5-final-evidence-base/> states that:

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Paragraph: 029 Reference ID: 3-029-20140306

It also goes on to advise that:

"Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt."

Revision date: 06 10 2014 See revisions

Paragraph: 035 Reference ID: 3-035-20140306

Billericay Action Group welcomes the creation of the Landscape Protection area in the East of Billericay and the inclusion of the central part of area 29 within

it. Through this protection of the Ramsden Heath and Woods Living landscape, Basildon Council clearly recognises the importance of the landscape and wildlife corridor that exists between the Ancient Woodland at Norsey Woods and the Nature reserve and SSSI at Mill Meadows.

However, Billericay Action Group cannot support any development that may prove detrimental to Mill Meadows and its SSSI, the wildlife Corridor therein and subsequently Norsey Woods. It is concerned about the potential impact that development at policies H26a and b may have on the wildlife corridor, particularly where H26a interfaces with the SSSI part of Mill Meadows.

Wildlife using the corridor will most likely do so by following hedgerow or wood links. Further work needs to be done to evaluate the hedgerows at the North end (in particular) where H26a has been proposed to ensure that the most valuable stretches of hedgerow are not lost/compromised.

The site will require access from both Greens Farm Lane and Outwood Common Road - destroying the hedgerows and, therefore the wildlife corridor, at these points.

Furthermore, in Basildon Council - SHLAA 2011-12 - Appendix D Highways Comments 2011, page 2, it is stated that:

"DM2 dictates prohibiting access from strategic/main distributor routes however exceptions may be made where access is required to developments of overriding public, environmental, national and/or regional need"

Can development there really be considered to be of overriding public, environmental, national and/or regional need? Also, there has been no highways modelling to consider the impact on increased traffic in the area, particularly along Outwood Common Road, Greens Farm Lane, Junctions with Southend Road and surrounding roads which already experience congestion at peak times. Mitigation via the creation of cycle routes is unlikely to encourage residents to cycle to the station/high street as the hills are very steep in this area.

A further consideration is that the SW part of H26a is on particularly high ground and building in that area – an area of the site that also has the major impact in narrowing the wildlife corridor – would have a major impact on the skyline and not be compatible with the Billericay Design Statement.

Billericay Action Group expects that Basildon Council will give weight to the expertise and comments of environmental groups, including the Essex Wildlife Trust and Norsey Wood Society when considering this policy. If it were to persist with H26, then the policy should state that planning applications MUST include a development and management plan for the extension of Mill Meadows and that the land should be gifted to the people of Billericay for its protection in perpetuity.

2.10. H27 – South Green

Billericay Action Group objects to policy H 27.

The Green Belt land east of Southend Road is recognised as a Critical Drainage Area which experiences flooding by surface water run-off from higher ground to the north west, some of which is subject to proposals for development (H 26b), and to the north east.

The Council's Flood Risk Sequential Test December 2015 notes both sites H26 and H27 fall into Potential Surface Water Flooding Hotspots and Critical Drainage Areas. Both sites are within an area susceptible to ground water flooding. Removal of trees and building on these sites will reduce the ability to soak up rainfall within H 27.

The most vulnerable areas are located through the centre of the site: the flood risk continues downstream adjacent to St Peter's Primary school which may be made more vulnerable to flooding. Off-site provision for surface water management under policy CC4 would be difficult to implement for the H 27 site without further incursion on Green Belt.

The proposed development of 220 homes will add significantly to Billericay's congestion, both locally on Southend Road where a single site exit will delay through traffic and in the centre of Billericay where Sun Corner is acknowledged to be at capacity at peak times. Such congestion causes traffic to use 'rat runs' through residential areas such as Outwood Common Road/Greens Farm Lane/Jackson's Lane (Billericay Action Group conducted a short traffic survey which revealed that traffic at the junction of Southend Road and Outwood Common Road exceeded that at Sun Corner: An ECC traffic survey should be a pre-condition on any development of H 27). See also BAG response to TS2k.v.

Furthermore:-

- While local shopping facilities are adequate there is very limited parking: it is difficult to see how additional spaces might be added;
- Local Primary schools are already full and children of primary school age are shipped to alternative schools outside their catchment area;

H 27 fails to address these local capacity problems.

Additionally, the HELAA summary for the site notes archaeological interest to the site. We have few details but hope any building would include proper archaeological oversight. We understand that a Stone Age knife was found on site (now in the Southend Museum) and the field name 'Grimshill' strongly suggests ancient cultural importance.

2.11. Break Egg Hill Plotlands

The Policies map shows Break Egg Hill as being removed from Green Belt, a policy we would oppose. However, we understand this is an oversight.

We oppose plotland infill in this location due to its immediate proximity to Norsey Wood SSSI\Ancient Woodland. Extra homes there, even a very small amount would have an impact on the ecology of the wood as its wildlife ranges beyond the wood itself.

The plotlands, especially some of the empty plots, contain many mature trees and other landscape and habitat features so there is a case for including the Break Egg Plotlands in the Landscape Protection Area.

3. Local Infrastructure and Services

3.1. Health

Basildon Hospital, alongside Southend and others is not coping with the current population, spending extended periods on Black Alert status. Basildon cannot do anything to ameliorate these problems and should not make them worse by accelerating migration to the borough.

Part of the strategy to relieve pressure on Basildon Hospital is to prevent unplanned admissions, particularly from vulnerable groups such as people living with frailty, through greater integration of health and social care services. Time will tell as to whether this will be successful in practice - if it is not, then we are concerned that Basildon Hospital will struggle to respond to the needs of increasing populations both in Thurrock and Basildon.

We are concerned that on a constrained site, Basildon hospital will not have the capacity to expand as and when required. The new multi-story car park is already at/over capacity at peak times.

It was reported recently in the Echo that NHS England were looking into the possibility of combining services between Broomfield, Basildon and Southend hospitals. This is at odds with a sustainable transport policy if patients are required to travel several miles to receive treatment/consultation at a hospital that is not local to them.

It has been identified that the level of house building will generate a need for an additional 2.5 GPs in Billericay. There is already a shortage of GPs as recruitment proves a particular problem.

Regarding the supply of GPs, rather than add to the loss of greenbelt, perhaps a new health centre could be provided at/within Mayflower Community Hospital at Blunts Wall and this could be used as a hub for integrated health and social care services.

3.2. Primary Schools

A recent FOI Request showed that all Billericay Primary Schools were oversubscribed, except for Sunnymede.

The infrastructure delivery plan states that 501 additional primary school places will be required in Billericay and that this will be achievable through upgrades to existing facilities. Quilters school will be particularly badly affected due to the particularly large scale of development in its catchment.

Billericay Action Group expects that when upgrading existing facilities, the council invests in providing the outstanding and fit for purpose facilities that the children and school staff of Billericay deserve. Anything less will not be acceptable and it will not be acceptable to upgrade facilities in a piecemeal fashion following the delivery of new sites according to the timetable set out in the infrastructure delivery plan.

Billericay Action Group is concerned about the implications of the recent announcement that all schools will be required to convert to academy schools,

on the ability of the council to deliver 501 new primary places within in the town.

3.3. Highways

3.3.1. Relief Route and Impact

Whilst much attention has been given to modelling to relieve congestion at Sun Corner, the highways modelling and topic paper have neglected to consider the junction where the proposed south/south west link road at the end of Frithwood Lane meets/crosses Tye Common Road to continue through H20 and H21 and onto London Road.

Tye Common Road is a cut through for people joining the A127 at either the Dunton interchange or via Herongate A128 to the Halfway House, workers going to Fords Dunton and Ford Warley, Brentwood via the A128 to avoid London Road and Basildon to avoid Laindon Road - the reverse is true coming back in the evening. It is a very convenient road to avoid the main routes for anyone heading south west in and out of Billericay.

This traffic will all meet at the junction of H20, Tye Common Road and Frithwood Lane. The Technical Note on 2031 Mitigation Modelling, page 16, admits that it has made assumptions about local and through traffic based on observed count data at junctions and needs to use more accurate methods to calculate the origin-destination routes of traffic. In the case of Tye Common Road, this is surely a must.

The Technical Note on 2031 Mitigation Modelling, page 20, also states:

"However, this particular measure should be subject to further study to determine the wider routing implications of improvements made to the Sun Corner junction and the potential for rat-running along Tye Common Road."

The Technical Note on 2031 Mitigation modelling 2031, page 19, also states that:

"The provision of a western link road as an alternative to the Laindon Road / Sun Corner mitigation measures has the potential to offer some congestion relief at junctions along the existing A176 route. However, a number of approaches are modelled to remain over capacity."

There been no modelling of the new junction of H21, London Road and H22 either in isolation or in its relationship to the London Road/Mountnessing Junction and Tye Common Road/London Road.

Residents living on Frithwood Lane in particular, will suffer a significant loss of amenity as a result of this proposal. Currently living on a quiet country lane they will find themselves living on a busy by-pass along with the accompanying noise and air pollution. Similarly, residents of the town as a whole will lose the amenity of a pleasant, popular and footpath accessible area of countryside.

There is also no consideration given to the impact on Mountnessing Road at its junction with Radford Way and Perry Street, in the Technical Note. The Highways Topic Paper - Dec 2015 Appendix B: Preferred Spatial Option,

shows that without mitigation the Mountnessing Road/London Road Junction would become significantly over capacity in the PM and AM peaks. Surely, this implies an increased traffic flow along Mountnessing Road - particularly if it is used to by-pass the High Street and join the south/south west link route.

In appendix C of the Highways Topic paper which considers mitigation modelling, it is stated that this junction will be approaching capacity, particularly in the AM peak. It goes on to say that:

"the mitigation options , once delivered in the Southern Part of the Town would serve to alleviate some of the capacity issues experienced in the north of the town as traffic flows would be improved."

This is a nonsense in relation to the Mountnessing Road/Perry Street/Radford Way junction as it is actually in the south of the town and the 'improvement in traffic flows' may well involve the rerouting of traffic along Mountnessing Road to/from its junction with Radford Way and Perry Street - as an unofficial by-pass for the high street - as traffic seeks to take advantage of the link route in and out of town. Mountnessing Road narrows where the bridge crosses the railway line and this would surely restrict any options for further mitigation at this approach to the junction.

Any increase in traffic flows along Mountnessing Road would amount to a loss of amenity to residents increasing noise and pollution - it is already becoming increasingly difficult to turn into the road from side streets and driveways.

The infrastructure delivery plan shows that the Frithwood Lane site would be developed last in 2025-2034. By then, 6-700 houses will have been built, with the accompanying increase in traffic and strain on Tye Common Road and Sun Corner before the link route is actually completed.

3.3.2. Mountnessing Road Roundabout

In principle this proposal could offer some merit. However, no consideration is given to its implications for Mountnessing Road if the subsequent ease of access from that road onto London Road attracted traffic which currently uses the Western Road junction with London Road, or even the High Street. The design of Mountnessing Road is not suitable for additional traffic and the impact of extra traffic on roads which directly link into Mountnessing Road, or feed traffic into it, is not considered.

3.3.3. Laindon Road Two-way and Slip Road

The preferred solution to remove the one way restriction in Laindon Road, encourage all northbound traffic at the Kennel Lane roundabout to travel along Laindon Road, and the provision of a slip road across part of the QEII Field is not acceptable.

The QEII Field has protected status and use of the land for a slip road is forbidden; Laindon Road already supports two major schools, two churches, a fire and ambulance station and an existing local community, as well as on street parking, all of which would be adversely affected by the proposed changes to the road, and the increased pollution attributable to the extra

traffic and its impact on the schoolchildren who regularly use the road cannot be ignored. Given that this proposal was the preferred choice detailed in the Technical Note – Junction Mitigation Testing, Billericay, and all other options were rejected in that document there would appear to be no practical option for mitigating the Sun Corner issues and therefore adding to the problems already affecting the Town with additional housing development would be inappropriate.

We also note that the experience of the short slip at the A176\A127 junction just south of the A127. This slip is very unpleasant to use, unpopular and arguably dangerous.

3.3.4. Other road considerations

One area not considered in the draft Local Plan is Southend Road. In traffic surveys conducted by Billericay Action Group in the morning rush hour at Sun Corner and the Outwood Common Road/Southend Road junction in early December 2015 it was shown that in the same time period more traffic used Southend Road than Sun Corner, 1696 vehicles /hour vs 1420 vehicles/hour. (Further information available on request.) Residents already confirm the problems on Southend Road. The survey also indicated that Grange Road was effectively the fourth arm of a staggered cross roads with the OCR/Southend Road junction and delays were continually experienced. Housing proposals H25, H26 and H27 would add 570 additional houses (c1000 vehicles) into this area, exacerbating the problems. These proposals are unrealisable without considerable improvements to the roads in this vicinity.

Also not considered or modelled is the impact of the new junction needed to serve proposed areas H21 and H22, and the combined impact of the three junctions which would exist in the space of around 600 yards along London Road following the construction of the new access to H21 and H22, ie this new junction, the Mountnessing Road roundabout and the Western Road signalled junction.

One final aspect of road travel in relation to Billericay and the Borough as a whole which is not addressed in the draft Local Plan is that whatever may be possible to increase traffic flows through the Borough in a north/south direction will only exacerbate the problem at Stock, which acts as a bottleneck to all traffic on this route.

4. Other Policies

4.1. Radford Crescent Car Park

We oppose the proposal to lose this car park in exchange for employment land as there is already a shortage of parking in Billericay.

4.2. Billericay Railway Station Car Park

Depending on the details, we would be likely to be supportive of a multi-purpose scheme to develop Billericay Station Car Park as long as it featured an increase in car parking spaces and good quality landscaping on the Radford Way side.

4.3. Community Infrastructure Levy

We would encourage a further consultation to address the CIL.

4.4. Housing Types

We would like to see more detail to ensure an appropriate mix of homes is delivered, perhaps including small footprint\terraced bungalows to allow older people to downsize in the local area and so improve the circulation of larger homes.

Note: this is not the same as policy H2 "Specialist Accommodation for older people".

4.5. Policy IMP1

The Council cannot ensure delivery of any subsidiary infrastructure requirements as it is not the body responsible for delivery. The Council has shown it has no appetite for taking enforcement action against developers who infringe or ignore planning conditions. The Council can only negotiate with developers over Section 106 payments, which in any case are not liable for payment until 75% of dwellings on a site have been sold (see also response to Policy IMP4). Thus residents of Billericay will experience years of disruption, construction traffic and subsequent new residents with no realistic prospect of the essential supporting infrastructure.

4.6. Policy IMP3

Developers will decide when sites are brought forward for development based upon economic and other considerations. The Council cannot impose a planning condition if the Planning Application has not been submitted. The proposals contained in the Infrastructure Delivery Plan suggest that site H27 will not begin construction until after 2020, yet Barratt's have already indicated their interest and have held an event for local residents.

The Infrastructure Delivery Plan also indicates that site H23 will not begin construction until at least 2025 yet this site is intended to deliver one section of the proposed Billericay south/southwest relief road, which would need to be constructed in advance of ANY local development if it were to be of any practical value.

4.7. Policy IMP4

Two developers with options on land around Billericay, Barratt's for H27 and Redrow for H22, have indicated to residents (Barratt's at their event on 9 October 2015 and Redrow at the Billericay Action Group Drop-In event on 12 March 2016) that they will not develop sites at a rate exceeding 50

dwellings/year to ensure selling prices are maintained. If this rate of build is common for all sites, as an example, H22 will be a building site for around 6 years and H23 for around 7 years. This is unacceptable to residents of Billericay and will result in construction traffic being a permanent fixture, adding to congestion on our roads, for over a decade.