# Basildon Draft Local Plan R18 Consultation

Paper 1 of 4 – Focus on South Essex & the Borough

Billericay Action Group
January 2025

Version 1.0

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# Table of Contents

# 1.Introduction

Billericay Action Group was established to protect the Green Belt around Billericay (and by extension the rest of the borough) from development so we oppose the overall 'shape' of the current draft.

We recognise the importance of getting a reasonable new Local Plan in place. After withdrawal of the old Local Plan, we had hoped for a new Plan which used little or no Green Belt.

In saying that we recognise that Green Belt is not as strong as a constraint as it once was – and we are using this consultation to engage and to oppose constructively.

This submission is fully consistent with our "Issues and Options", earlier consultations for the withdrawn Local Plan and responses to planning consultations.

We would observe that public's opposition to the determination of Policy H4 by the Planning Committee has significantly undermined the quality and quantity of public engagement with this consultation. Our own contribution would have been stronger and more wide ranging without that other workstream.

The BAG Submission includes four papers:

- This paper focussing on issues affecting Basildon Borough and the whole South Essex region.
- Paper 2 of 4, focussing on Billericay
- Paper 3 of 4 – BAG South Essex Rail Topic Paper – Executive Summary
- Paper 4 of 4 – BAG South Essex Rail Topic Paper

# 2. Housing Targets

2.1. National Picture - BAG View on the Housing Affordability Crisis
The country has a crippling housing affordability crisis, but it is not caused by undersupply, our housing stock has grown faster than the population in this millennium.

In the same period the proportion of homes held by the private landlords (including Private rental, AirBnB, Empty homes) has doubled to 19%. 2.5 million homes have shifted from Council Housing and Owner Occupiers to investors, and this trend shows no sign of slowing down.

The insatiable hunger of this sector makes demand almost infinite. The Office of National statistics estimates the country needs under 150,000 new homes per year. We probably have enough houses and we probably build enough houses. However the government intends to build 375,000 homes per annum – plus delivering large new towns.

Hyper-supply of this kind will not reduce house prices; indeed, the government (like the last) doesn't want house prices to fall. They know they're barking up the wrong tree.

If a national government decides it genuinely wishes to address affordability (perhaps by stabilising rather than reducing prices) then a policy of buying and building Council houses, while reversing the trend towards landlordism will be necessary.

2.2. Local Need - Office of National Statistics
The Office of National Statistics 2018 Household Projections is the most reliable estimate of local housing requirements, it gives a requirement for 8,605 over 20 years, which includes an allowance for in-migration (mostly from London) at recent rates.

Based on the Greater Essex Demographic Forecasts produced for the Essex Planning Officers Association, we estimate that local people require less than 6,000 of these

We could meet the ONS projection of a need of 8,605 without going into Green Belt – however we have to consider the Government algorithm.

2.3. Government 'Local Housing Need' (LHN) algorithm
The government algorithm – the Standard Method for LHN (formerly known as OAN) gives us a starting point target of 27,111 over 20 years (1356 per annum). We recognise that we can't change this starting point.

This is based on the following:

- A "one-size-fits-all" assumption that the borough housing stock should grow by 0.8% a year.
- An uplift to channel growth to less affordable places. This is done by comparing housing costs with local earnings.

  We understand the earnings of well paid out-commuters (mainly those commuting to London) are not taken into consideration.

The uplift is strange as there is no prospect and no intention of delivering lower house prices.

2.4. Comparing Local Need with the Government Algorithm

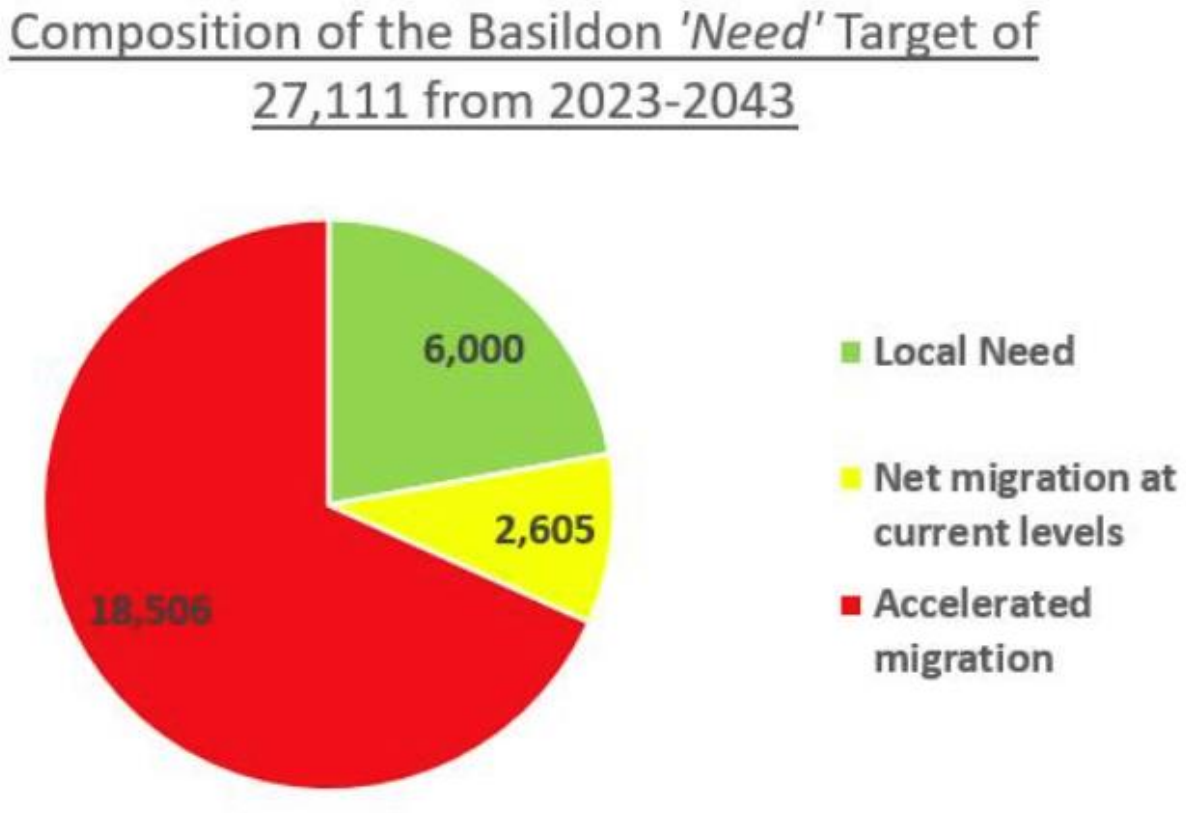



**Figure 1 - Comparing Local Need against the Government algorith. The green and yellow sectors together align with ONS projections, the most reliable guide to true need.**

2.5. Affordable Housing Target – Policy HOU2
A "need" for 10,420 (unaffordablely expensive) affordable homes has been "'identified"[1]. Given that the ONS estimates the total need (including an allowance for continued in-migration) is for 8,605 for all house types – it is hard to conclude this figure makes any sense.

But as we say in 4.2, in we do support the Council policy of seeking 50% of houses to be classed as affordable where Green Belt is used.

2.6. Reducing the Plan Period Housing Target
We recognise that the Council sees more benefit is the large-scale building than we do. In saying that the higher the target the Council works to, the harder it is to deliver good or 'sound' planning outcomes.

Our view is that if the Council decides a lower housing target would be desirable then some of the following options may help achieve that:

[1] Originally from the South Essex Housing Needs Assessment 2022

- Starting the Plan Period in 2025 (or later) so we only have to deliver 18 years' worth of housing rather than 20. Only a small number of houses have been built in 2023-25 due to market conditions.
- Using Green Belt as a constraint to meeting LHN. We recognise that this will be harder than it used to be, and that any shortfall must be reconsidered at each 5-Year Review.
- We understand that once 'devolution' is embedded, that the usual way to use Green Belt as a constraint may be for LHN to be set at county level and then allocated down to combined authorities with constraints such as Green Belt (which doesn't extend to central and north Essex) taken into account when deciding the allocation.
- Moving some of our need to other LAs will be difficult as they face similar challenges to us, but a joint Plan with Thurrock may offer opportunities.

# 3.Local Development Scheme – Another R18 Needed

The current Regulation 18 consultation is vague in places, and seems to us more akin to a Spatial Strategy which would normally be followed by a further Regulation 18 on a more detailed draft. We understand though, that the Council intends to proceed straight to Regulation 19.

A second R18 could deliver better outcomes as a result of community feedback to current proposals and more detailed subsequent proposals. It could also mean a sounder plan in the sense that some of the less sound elements had been removed or refined.

But in calling for a further R18, we recognise the time pressures the government has placed the Council under.

# 4. Housing Typology

4.1. Number of bedrooms – Policy HOU1 Point 1
We strongly support the Councils policy

4.2. "Affordable Housing" – Policy HOU2 Point 2
Although we oppose the use of Green Belt for housing, we strongly support the Councils aim that where this does happen, that 50% will be classed as affordable.

Is supporting this aim, it is worth pointing out the following:

- The government definition of affordable is that it is discounted 20% from sky-high (especially in Billericay) market rates. The government definition is an appalling misnomer. In terms of social utility there is no comparison with the much needed genuinely affordable Social\Council homes.
- The Council's policy, based on the government's "Golden Rule", is subject to "viability". This is the government's guarantee that developers are entitled to a 20% profit on each site, with the developers themselves doing most of the accounting. The positive aspiration to deliver this proportion of 'affordable' homes will not be met.

4.3. Passivhaus
We are sympathetic to the provision of Passivhaus dwellings as they are less damaging to the environment once built.

However, we are deeply alarmed that a large part of the area of Policy IF1 is being promoted for Passivhaus. That policy is very harmful from a biodiversity and other perspectives as we discuss in Paper 2

We think the incentivisation of Passivhaus is best done though new national standards, and the tax system rather than through local planning policy.

For instance, we understand that Scotland seeks to make Passivhaus the standard for new-builds.

4.4. Solar Panels
We would strongly support any requirement for all new homes to have solar panels as a requirement, in order to reduce the carbon footprint of these homes in the operational phase. Rooves and car parks are much preferable to agricultural land when siting solar panels.

# 5.Our threatened Green Belt

Only 63% of the borough (6931 ha) is currently Green Belt, comparable to some London boroughs[2]:

- Bexley – 56%
- Richmond upon Thames – 54%
- Havering – 53%

We're not aware that any of these intend to develop Green Belt.

Furthermore, unlike many other authorities, a significant proportion of our Green Belt land is already covered by extensive low-density residential plotlands, solar farms and other non-rural land uses, including[3]:

- Residential land – 10% of our Green Belt, 6% of the Borough.
- Pitsea Tip and Solar Farms – 6% of the Green Belt, 4% of our Borough.

On a landscape scale, much of our Green Belt is on the Langdon Hills ridge and South Essex marshes, which are unsuitable for housing growth for a variety of landscape, biodiversity and practical town-planning reasons.

That broad area - Basildon Green Belt south of the main branch of the C2C railway (including Pitsea Tip) - takes up around 23% the boroughs Green Belt - about 15% of the total borough area.

To meet the proposed Housing Target, and deliver proposed employment sites would (assuming the current 'broad brush' areas were honed down to smaller sites) require at least 11% of our borough, 7% of the borough.

This would leave the borough as (at most) 56% Green Belt, 46% if we were to disregard residential green belt and 'industrial' uses such as solar farms and Pitsea Tip. The designation of land as Grey Belt would reduce that further.

# 6.Grey Belt

We are dismayed by the government's new Grey Belt policy but see no alternative to the Council allocating some land towards it.

The Local Plan document says that the extent of Grey Belt is defined by the Policies map, but the Policies map does not show it.

When the Council does define Grey Belt, it faces a challenge in that there is the Green Belt Review 2017 (deemed robust by the Planning Advisory Service) and the utterly different Green Belt Study on 2024.

Our arguments for the superiority of the original document are outlined in brief in **Error! Reference source not found.**. In our view the original document should be used to determine Grey Belt as well as Green Belt release. At the very least, the original document should be a consideration alongside the new.

[2] CPRE – figures include metropolitan Open land, a London specific equivalent to Green Belt. **CPRE-GiGL-Report-FINAL.pdf (cprelondon.org.uk)**

[3] Research by BAG, using Google Earth area measurement.

# 7.Infrastructure

We view the current approach to infrastructure provision, one of waiting till housing is in place to determining and delivering infrastructure as naively cornucopian, and in not being 'positively prepared', probably unsound.

In some cases, adequate infrastructure is practically impossible or prohibitively expensive. In other cases, such as new schools, sites need to be identified as part of the Local Plan.

## 7.1. Social Infrastructure – Education

It is a generally accepted planning principal, that 700 houses requires 1 'form entry' of education capacity.

This means that one class is required for every school age year group (there are also requirements for Early years and Post-16 Education). 360 school places (12 classes of 30) for each year group from Reception up to Year 11.

27,111 houses will therefore generate 38.73 form entry – 13,943 school places.

This is equivalent to around 4 new Secondary Schools and 15 new Primary Schools, though it is accepted that some schools in the borough may have some spare capacity, and a few could probably be expanded.

That said, if the population is required to grow by one third, as the Plan intends, then that will generate a huge requirement for new schools and the Local Plan process should identify sites.

If schools are not provided close to people's homes, then the education authority (currently Essex, but that may change) will be required to bus the children to school at considerable expense.

**Note:** The ability of current Billericay schools to accommodate growth will be considered in Paper 2.

## 7.2. Importance of London Commuters

Basildon borough residents who out-commute to London earn significantly higher wages than those who work locally, this makes them vitally important to the borough's economy.

This makes the overstretched commuter links that take them to work just as important. It is of strategic importance to the borough that these links are not further overburdened.

**Table 1 - London Commuters by area (2011 Census)**

| | Billericay | Rest of Basildon | Castle Point | Rochford | Southend | Thurrock |
|---|---|---|---|---|---|---|
| **Train** | 23% | 11% | 10% | 12% | 12% | 13% |
| **Road** | 9% | 9% | 8% | 6% | 4% | 19% |

7.3. Commuter Infrastructure – Rail

Paper 4 is a detailed study of capacity issues in South Essex. Neither local government, national government of the railways have produced anything comparable. Paper 3 provides a one-page summary.

But it may be worth briefly mentioning here the kind of fundamental capacity improvements, outlined further in Paper 4, that Basildon could lobby for:

- The BML2 proposal for a railway, much of it on disused track bed, from Brighton to Cambridge via Canary Wharf, Stratford and Harlow. Some West Anglia services would be rerouted along this route, freeing up capacity at Liverpool Street which could be taken up by Great Eastern Services, potentially including some on the Southend Victoria branch via Billericay and Wickford.
- For a Crossrail 2 branch – known as the 'Eastern phase' – linking to the C2C branch creating extra capacity there. South Essex authorities lobbied for this around 2016.
- For a rebuild and expansion of Fenchurch Street a few hundred metres east at Minories\Tower Gateway. This expansion from four to six platforms might be delivered in the Plan Period and would deliver extra capacity on the C2C railway.
- Crossrail doesn't bring capacity improvements to the borough.

7.4. Commuter Infrastructure – Roads

7.4.1. Overview: Radial Commuter Links

South Essex' radial commuter routes are, south to north, the A13, the A127 and the A129. The A127 is the most important of these, with the A129 (which passes through the Billericay urban area) being used mainly for shorter distance E-W commutes. The A12 a little to the north, shared with north Essex and East Anglia, is also used by some of our London-bound commuters.

It is understood that the A13 and A127 are the busiest A-roads in southern England, with the A127 facing the major handicap of having been de-trunked in the 1990s, becoming the responsibility of Essex County Council who lack the funds for any major investments.

7.4.2. Overview: North-south links

South Essex has poor N-S links with only three classified roads heading north out of the area, all of them inland of the Crouch estuary:

- A128 single-carriageway, from Tilbury through Brentwood to Ongar. This road links the A13, A127 and A12.
- B1007 single carriageway, the only classified road to head N-S through Basildon borough. This road enters the Billericay urban area as the A176 and heads out of it towards the fast-growing city of Chelmsford as the B1007
- The A130, a high-quality dual carriageway linking the A12 to the A127 and A13.

7.4.3. A127

The A127 has over 73,000 movements per day (2015), as busy as some motorways, but it is only a dual carriageway. This figure is projected to rise to over 100,000 early in the Plan Period and that estimate can only be based on lower population growth figures than currently anticipated (ie LHN) for the area.

These figures are drawn from the Essex CC study "A127 – Corridor for Growth", a study whose title belies the unfounded pre-conception that south Essex is a suitable location for growth, yet whose contents do so much to undermine that point of view.

It should be noted that, due to the peninsula nature of south Essex (eastern parts of S Essex are located on the Rochford Peninsula, south of the bridgeless Crouch), that this is a short road, a factor which compounds the impact of the traffic volume as there is not the space (and hence time) for the volume of traffic to be thinned out.

During the 2016 R18 consultation, Essex CC, Havering, Thurrock and TfL expressed concern[4] about the effect that growth in Basildon and south Essex would have on the A127. Furthermore, the housing targets in the various iterations of the withdrawn Plan were considerably lower.

Basildon's response to that was to delay some of the growth in the withdrawn Plan until a new grade separated junction, with link roads was built near Wickford. This was fine, but problems remained in that it did not address the fundamental limitations on other A127 junctions in the Borough, the limited unwidened nature of the road itself.

There are aspirations for improvements to various points on the A127, but we're not aware of anything as necessarily fundamental as re-trunking the road and making it three-lane both ways.

The A127 is known as the 'arterial', by naming it for the arteries of the human body, its builders recognised its importance to the south Essex economy – to extend the analogy, the route is now sclerotic.

[4] 7.31 of the 2016 Draft Plan Statement of Consultation

7.4.4. Impact of Proposed Lower Thames Crossing
The Lower Thames Crossing would deliver some benefits to the region, but adversely affect south Essex by reducing the resilience of our radial commuter links.


**Figure 2 - The Lower Thames Crossing would adversely affect resilience on the A127 and A13**

Disruption on the new motorway leading to the new crossing would see traffic choose the A127-A128 and A13 as alternative routes to the crossing. This would be a relatively frequent occurrence and its impact severe.

7.4.5. Air Pollution
South Essex is downwind of the capital and its traffic induced air pollution, while Thurrock, immediately upwind of Basildon has one of the very worst air pollution problems in the country, something that is likely to worsen after the Lower Thames Crossing is built.

The A127 makes a particular contribution to local air pollution, and central government have warned Basildon and Rochford Councils to consider tolling in order to reduce illegal levels of pollution at particular areas of the A127.

7.4.6. Commuter Road Conclusion
The A127 and other radial commuter links are over-stretched and cannot accommodate growth on any scale. An ambitious and expensive series of new and improved junctions would probably not be enough to make the route able to accommodate growth, this could only be achieved by widening the road for its full length, something that would cost billions and could not be achieved in the Plan Period, if at all.

# 8. Evidence Base

## 8.1. Biodiversity

The Council is under pressure to deliver very large numbers of homes, but is also obliged to try to do it in a way that increases biodiversity. Although it's probably possible in some cases to develop a site and increase biodiversity, it is in general deluded greenwash.

We are using this consultation exercise to bring our local and ecological knowledge to bear, in order to help the Council 'square the circle' as far as is possible. To achieve this the Council will need to think about biodiversity spatially and strategically.

It must remember the mitigation hierarchy. First and foremost, it must avoid harm. Where it can't it must minimise it, then look at restoration and last of all consider offsetting.

A major limitation of Biodiversity Net Gain, and the offsetting approach round it, is that it focusses on units of habitat and not their context – their spatial\strategic significance.

### 8.1.1. Council obligations

The Council is required to take into account its Biodiversity Action Plan and the draft Essex Local Nature Recovery Strategy.

These emphasise the need for improved and extended habitats with wildlife corridors between them. In fact the draft ELNRS highlights areas especially well-suited to strategic habitat creation – these opportunity areas for each habitat are typically close to other habitats of the same type. Build close to a key habitat – eg a woodland - and this opportunity is lost.

This is absolutely vital – but the Council probably needs help in turning this nebulous obligation into something concrete.

Unfortunately, the draft Plan, in its current form, does much the opposite. Development is proposed immediately adjacent to some of our most important habitats and in ways that would fragment vital wildlife corridors.

### 8.1.2. Understanding harms

It's important to understand the anthropomorphic harm to wildlife and their movement corridors that occur by building near to them:

- Fragmentation of habitat\corridors
- Recreational disturbance by people and their dogs.
- Predation by domestic cats
- Light pollution is very harmful to the base of the food pyramid
- Noise pollution
- Changes to local hydrology
- In some cases, air and water pollution
- Introduction or spread of non-native species
- Fly-tipping, including garden waste.

It is not enough to avoid building on key sites.

8.1.3. Identifying Key Nodes\Wildlife Sites
Generally speaking, identifying wildlife corridors is not a simple matter that lends itself to clear maps. It is generally better to focus on the key nodes in the "network" of corridors (as well as their associated 'opportunity areas' – as identified by the ELNRS).

Regrettably the draft ELNRS opportunity areas are not currently online, now the ELNRS consultation has closed, so we cannot generally point out ELNRS areas for the purpose of this consultation.

We do though comment on corridors in a qualitative way in relation to some of the site allocations.

In identifying "nodes", reservoirs of biodiversity in the wider landscape our first task is to identify the sites. In doing that our most important task is to bring our register of Local Wildlife Sites (LoWS) up to date.

The reasons the LoWS Register is out of date include:

- BAG has applied for 5 west Billericay woods to be added to the Natural England Ancient Woodland Inventory. Three have been decided and approved, two others have yet to be determined.
- The DEFRA Magic Map includes a number of BAPS Priority Habitats (specifically Secondary Woodlands) that have not been registered as LoWS.
- We are also entitled to register areas that are home to the highly threatened and protected Hazel Dormouse. There are at least two well hedged agricultural areas of north and east Billericay that could be designated.

8.1.4. Response – Buffers
Having identified key sites, they can be best protected by establishing development buffer zones around them. The impact of development near wildlife sites is recognised by the Integrated Impact Assessment which recognises harms which recognises harms of developing within 250 metres of an important habitat.

The ”Call for Sites” (HELAA) process sets out recommended buffer zones around habitats.

*Table 1: Buffer Zone Distances for Environmental Designations*

| Environmental Designations | Buffer Zone Distance |
|---|---|
| Sites of Special Scientific Interest (SSSI) | 2km |
| Special Areas of Conservation (SAC) | 5km |
| Special Protection Area (SPA) | 5km |
| Ramsar (wetland area) | 5km |
| Local Nature Reserve (LNR) | 100m |
| Ancient Woodland | 100m |
| Local Wildlife Site | 100m |
| Biodiversity Action Plan (BAP) Priority Habitat | 100m |
| Potential Protected Species Area | 10m |

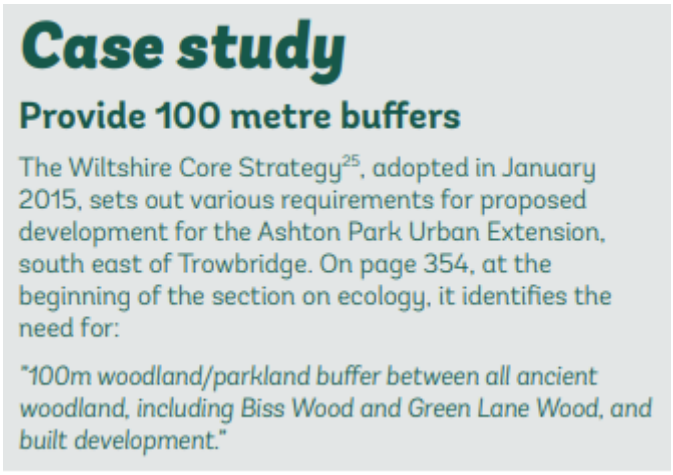
*Table 2: Buffer Zone Distances for Utilities*

| Utilities | Buffer Zone Distance |
|---|---|
| Wastewater Treatment Works | 400m |
| Major Hazard Area | 150m |
| High Voltage Overhead Transmissions Lines (HVOTL) | 30m-60m[8] |
| High pressure gas pipe lines | 60m |
| Oil pipelines | 6m |

5.2.7 The buffer zone threshold for SSSI, SAC, SPA and Ramsar are all determined through Environmental Impact Regulations 2011. In the cases of other environmentally sensitive designations listed, these have been determined and agreed upon with key stakeholders including Natural England, Essex County Council Ecology teams and the Wildlife Trust during the production of the Basildon Borough Council Strategic Environmental Assessment Scoping Report 2011[9].

**Table 2 - Basildon's policy on buffer zones around environmental designations and utilities. Page 18 of the HELAA “Call for Sites” Methodology.**

Although all these buffer zones are important - the most important buffer zones that apply around Billericay are those for Ancient Woodland (100 metres) and Sites of Special Scientific interest (SSSI – 2 kilometres).



**Case study**

**Provide 100 metre buffers**

The Wiltshire Core Strategy[25], adopted in January 2015, sets out various requirements for proposed development for the Ashton Park Urban Extension, south east of Trowbridge. On page 354, at the beginning of the section on ecology, it identifies the need for:

*"100m woodland/parkland buffer between all ancient woodland, including Biss Wood and Green Lane Wood, and built development."*

**Table 3 - There are many examples of Planning Authorities requiring 100 metre buffers round Ancient Woodland as part of their Planning Policy**

It is probably unrealistic to expect Billericay's two SSSI (Norsey Wood and Mill Meadows) to act as an absolute constraint within 2k, but they should act as a constraint everywhere within 2k. Especially where a site is close to an SSSI, or reasonably close to both (as indicated by the "Impact Risk Zones" on the DEFRA Magic Map).

8.1.5. Response – Garden Community Principles
Biodiversity would be somewhat protected, and in some cases enhanced, if new developments were built to "Garden Community Standards" as defined in the Essex Design Guide[5] - this means that at least 50% of a new Development is open space (green and blue infrastructure).

Benefits include:

- Makes it easier to provide buffers and enhanced wildlife corridors.
- Great for flood prevention too – which can, if done right be fantastic for biodiversity.
- Makes it easier to leave large buffers round existing Rights of Way (protect human amenity) and add new accessible routes.
- Can help combat and mitigate climate change.

This is not an unusual approach, at least one recent application to build on Billericay Green Belt followed this principal, while Brentwood follow this approach in their "Dunton Hills Garden Village".

8.1.6. Response – Avoid Well-hedged areas
The Biodiversity Action Plan also highlights the importance of preserving hedges, which are vital habitats and wildlife corridors. The obvious implication of this is that we shouldn't just try to minimise the loss of hedges on sites – that's not enough - we should avoid harm by avoiding designating housing allocations in well hedged landscapes. This avoids both the direct

[5] **Green Infrastructure | Essex Design Guide**

harm of destruction\fragmentation but also the many indirect anthropomorphic harms that nearby development brings.

8.2. Draft Settlement Hierarchy

The current Settlement Hierarchy Document reproduces the oversight of previous iterations by omitting Havering's Grove. This settlement is located on the A129 astride the boundary with Brentwood. Most of the settlement is in Brentwood Borough.

This oversight risks coalescence, with Billericay absorbing the settlement and becoming a cross-boundary community.

8.3. Two Green Belt Reviews

Basildon's challenge is that it has two conflicting Green Belt Reviews:

- The 2017 Review, carried out by Basildon Planning Officers, which included site visits, with extensive descriptions and photographs. The government's Planning Advisory Service found this robust.
- A 2023/24 desk study carried out by consultants LUC, who do not know the borough and hardly visited it. This version used a different, and objectively inferior methodology that attached much less value to Green Belt, especially at Billericay and Wickford.

Billericay Town Council highlighted the problems and weaknesses inherent in this in their letter to Basildon Council.

The government is aware of the issue of inconsistent and contradictory methodologies, and are considering standardising so that LA Officers, who know their area better than any external consultant, can carry out Reviews themselves. Unless and until that happens, the conflicting Green Belt Reviews will be a major threat to the soundness of decisions taken around Green Belt Release and Grey Belt.

8.4. Integrated Impact Assessment

8.4.1. Buffer around habitats

The IIA Objective 10 (Value, maintain, conserve and enhance the Borough's biodiversity and geodiversity) recognises that there are harms building within 250 meters of key habitats.

But the threshold for major harms is vague and inadequate, ie ">=1% of site intersects with a locally designated site, Priority Habitat or Ancient Woodland".

We would urge that the threshold for major harm be changed to 100 metres so that:

- It is consistent with the buffers used in the HELAA (see 8.1.4)
- It is consistent with the 250m\100m approach used for Objective 11 (Value, conserve and enhance the Borough's historic environment and cultural heritage)

8.4.2. Priority 2 and 3, Public Footpaths

Development close to a public footpath is clearly adverse to public amenity of the land, especially where development is adjacent to a development, or worse still that development occurs on both sides.

So it is perverse that Priorities 2 and 3 consider it a *benefit* to develop near such assets

8.5. General Principals for GB Developments

8.5.1. Public Rights of Way

We should avoid building adjacent to Public Rights of Way as this will reduce public amenity of remaining countryside. This is especially important where the PRoW is well used.

Where development does occur in the vicinity of a ProW, a significant buffer should be retained around it.

8.5.2. Net Density

Net density refers to the density of housing, per hectare, in the parts of a development site that are built on – ie excluding the green and blue architecture\open space (we advocate at least 50% as described above).

Our view is that the net density of the developed part of Green Belt housing allocations should be around 30 to 35 per hectare.

Developers prefer a lower density, but much less than 30 and land is wasted on expensive homes on large footprints.

Conversely, much higher than 30, and it is hard to find room for adequate parking and street trees.

Much denser town centre sites are more sustainable but green belt sites (excepting perhaps New Town sites) are inevitably car dependent limiting density.