



BILLERICAY DISTRICT RESIDENTS' ASSOCIATION

A Response to the Consultation on the Basildon Borough
Council Draft Local Plan, January 2016

March 2016

Cheffins

Clifton House
1 and 2 Clifton Road
Cambridge CB1 7EA
01223 271985

Contents

<i>Section</i>	<i>Page</i>
1. Introduction	2
2. Draft Housing Policies	2
3. Draft Transport Strategy Policies	8
4. Draft Healthy Communities Policies	11
5. Draft Retail Policies	11
6. Conclusions	11

Revision	Description	Originated	Authorised	Date
	Final draft	PAS	JB	14/03/16
	Submission	PAS	JB	18/03/16

<p>This document is copyright and should not be copied in whole or in part by any means other than with the approval of Cheffins. Any unauthorised user of the document shall be responsible for all liabilities arising out of such use.</p>

1. INTRODUCTION

- 1.1 This representation has been prepared on behalf of the Billericay District Residents' Association (BDRA) who have instructed Cheffins to provide a detailed objection to certain policies in the Draft Local Plan (January 2016) produced by Basildon Borough Council.
- 1.2 BDRA has about 4,500 households within the Billericay area as part of their membership and represents the views of these members about all matters concerning the quality of life in the town.
- 1.3 The Council's previous consultation on the "Revised Preferred Options" stage of the Core Strategy DPD (March 2014) adopted a 'spatial' approach to the proposed options focusing on the distribution of different levels of growth between the three main towns – Basildon (including Laindon and Pitsea), Wickford and Billericay.
- 1.4 Our previous representation on behalf of the BDRA objected to the Council's preferred spatial Option 2A, "proportionate distribution to the main towns", as set out in the Core Strategy DPD, and supported Option 2C - "growth focused on Basildon". Many of the comments that were made in these representations are still applicable to this latest consultation on the Council's draft Local Plan, particularly:
- The importance of Green Belt countryside around Billericay;
 - Transport corridors with serious capacity issues;
 - The likelihood of such high levels of housing growth being delivered in the Plan period; and,
 - Our specific comments on several of the proposed housing areas (several of which have now been carried through to the housing site allocations in the draft Local Plan).
- 1.5 This objection is still based on the detrimental impact that the proposed housing site allocations would have on the character and setting of Billericay, but more importantly on the extensive loss of valuable Green Belt land, which serves to meet the five main purposes of its designation, as set out in the National Planning Policy Framework (NPPF). This objection also discusses the likely impact of the proposed housing site allocations on the town's infrastructure, which is already inadequate in a number of key service areas.
- 1.6 Any queries or requests for further information should be addressed to Paul Sutton at Cheffins (01223 271985) or email paul.sutton@cheffins.co.uk.

2. DRAFT HOUSING POLICIES

Green Belt

- 2.1 The Council's Housing Strategy seeks to deliver 15,260 homes in the Borough during the period 2014 to 2034, and expects that during the period 2015 to 2020 these homes will be delivered at a rate of at least 615 homes per annum. During the remainder of the plan period (i.e. to 2034) the Council anticipate delivery at the rate of 822 homes per annum.

-
- 2.2 The Council fully accepts¹ that it has persistently under-delivered in terms of housing provision over the last five years, and has only delivered an average of 473 homes per year over the period April 2012 to March 2015². Therefore to suggest that delivery will increase to over 800 homes per year during the plan period would seem very unrealistic, based on past delivery rates, and takes no account of the constraint imposed by Green Belt designations. While the BDRA accepts that the Council is required to meet the 'objectively assessed level of housing need' for the Borough, the target for housing growth has been set at a level that has never been achieved in recent years – even in periods of high growth. The target of 15,260 new homes over the Plan period has resulted in the need to find green-field sites for between 8,000 and 8,500 homes (and between 11ha and 14ha of employment land), which all would be located on Green Belt land. In total therefore, the draft Local Plan proposes that up to 350 hectares of Green Belt land would be lost to new development.
- 2.3 Nearly 70 hectares of Green Belt land is proposed for residential development around Billericay on twelve separate sites varying in size from 2.5 hectares to 19 hectares. The total number of new dwellings that might be delivered from these sites is in the order of 1,740 homes.
- 2.4 **BDRA strongly objects to the loss of Green Belt land around Billericay for new housing development and it considers that growth on this scale is unjustified.**
- 2.5 The NPPF (National Planning Policy Framework) sets out the Government's planning policies for England and how it expects these to be applied. It contains 'a presumption in favour of sustainable development', which it defines as having three dimensions: economic, social and environmental. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and it is a material consideration in all planning decisions.
- 2.6 The policy on the protection of the green belt is contained in section 9 of the NPPF, which sets out the fundamental aim of green belt policy:
- "79. 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."*
- 2.7 The NPPF also makes the following key policy statements in respect of Green Belt:
- Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt (paragraph 81);
 - Once established, Green Belt boundaries should only be altered in exceptional circumstances (paragraph 83);
 - When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.

¹ Para.1.12, Five Year Land Supply Report (2015 – 2020) – November 2015

² Annex A, Five Year Land Supply Report (2015 – 2020) – November 2015

- 2.8 In March 2014 the Government published new web-based Planning Practice Guidance (PPG) to accompany and give further detail about the policies in the NPPF. This guidance sets out that unmet housing need in a particular area is unlikely to meet the “very special circumstances” test to justify development in the Green Belt:

“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.³”

- 2.9 On 4th October 2014 the Government announced that it had updated its online Planning Practice Guidance (PPG). The aim of this was to reaffirm local authorities’ abilities to “safeguard their local area against urban sprawl, and protect the green lungs around towns and cities.” The Government said that it wanted to make planning policy clear that housing need does not justify the harm done to the Green Belt by inappropriate development. The new guidance reads:

“Do housing and economic needs override constraints on the use of land, such as Green Belt?”

The NPPF should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan.

The NPPF is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, or specific policies in the NPPF indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as sites of special scientific interest; land designated as Green Belt, local green space, an area of outstanding natural beauty, heritage coast or within a national park or the Broads; designated heritage assets; and locations at risk from flooding or coastal erosion.

The NPPF makes it clear that, once established, green belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.”

“Do local planning authorities have to meet in full housing needs identified in needs assessments?”

Local planning 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 for an authority to meet its need”.

(our emphasis).

³ PPG, Housing and economic land availability assessment Methodology – Stage 5: Final Evidence Base, 6th March 2014.

- 2.10 In December 2014 the Planning Minister, Brandon Lewis, wrote to the Chief Executive at the Planning Inspectorate about strategic housing market assessments. This letter set out the relationship between housing figures produced as part of a strategic housing market assessment and those in a Local Plan and how to take into account constraints such as Green Belt land:

“However, the outcome of a strategic housing market assessment is untested and should not be automatically seen as a proxy for a final housing requirement in Local Plans. It does not immediately or in itself invalidate housing numbers in existing Local Plans. Councils will need to consider strategic housing market assessment evidence carefully and take adequate time to consider whether there are environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement. They also need to consider whether there are opportunities to co-operate with neighbouring planning authorities to meet needs across housing market areas. Only after these considerations are complete will the Council’s approach be tested at Examination by an Inspector. Clearly, each Council will need to work through this process to take account of particular local circumstances in responding to strategic housing market assessments”⁴.

- 2.11 In the light of the above, we would therefore seriously question whether the evidence that Basildon Council has produced in support of the draft Local Plan gives sufficient weight to the importance that should be accorded to existing Green Belt areas, and in particular:

- Whether the starting point has been an overriding focus on meeting ‘objectively assessed need’ (OAN) to the extent that loss of Green Belt land on a scale never before contemplated is seen as justified;
- Whether such ‘exceptional circumstances’ actually exist to justify the loss of Green Belt land on the scale proposed;
- Whether meeting the OAN for housing would result in such adverse impacts to the character and purpose of the Green Belt that these impacts would significantly and demonstrably outweigh the benefits, when assessed against the NPPF taken as a whole;
- Whether the constraints imposed by the current extent of the Green Belt in the Borough indicate that development should be restricted to the extent that the Council’s ability to meet its OAN is significantly restrained;
- Whether the proposed housing site allocations contained in the draft Local Plan will meet the tests for ‘sustainable development’ set out in the NPPF in terms of: location; access to public transport; proximity to schools, shops and local services; provision of infrastructure; and promotion of sustainable modes of transport.

- 2.12 BDRA believes that the Council has not given sufficient weight to the constraint imposed by current Green Belt designations and remains convinced that the adverse impacts do not significantly and demonstrably outweigh the benefits, when assessed against NPPF policies taken as a whole.

- 2.13 BDRA therefore opposes the loss of Green Belt land around the town for housing development and does not believe that population growth or economic need constitute such exceptional circumstances to justify the release of Green Belt land for development on the scale proposed.

⁴ Letter from Brandon Lewis to the Chief Executive at the Planning Inspectorate, 19/12/2014.

- 2.14 BDRA are similarly unconvinced that the draft Local Plan contains sufficient specific proposals for improvements to local infrastructure to meet existing residents' needs and to ameliorate the impact on local infrastructure of an additional 1,740 dwellings. Further information on this aspect of the Local Plan is contained in the following paragraphs.

Infrastructure

- 2.15 The Council has prepared an Infrastructure Delivery Plan (IDP) as part of the draft Local Plan. Any IDP should set out clearly the infrastructure needed to deliver planned growth sustainably, effectively and at the right time. The Council are also proposing to implement a Community Infrastructure Levy (CIL).
- 2.16 The infrastructure identified in the IDP should be deliverable within the Plan period and include details of where the funding for this infrastructure will be found. In cases where a gap is found between the identified infrastructure cost and the likely available funding to pay for this infrastructure, this will be used to support the implementation of the CIL, which would be charged on new development in the Borough and used to provide the items of infrastructure necessary to support the identified growth.
- 2.17 BDRA have several specific concerns on matters relating to infrastructure, as follows:

Education – the IDP (para. 4.5.22) acknowledges that there will be a shortfall in funding for future education provision, which is estimated to be as much as £40 million. The requirement for education provision in Billericay as a result of the proposed site allocations is 501 additional primary school places (at a cost of £5.4m) and 200 secondary school places (at a cost of £3.7m), assuming that 40% of secondary school admissions that reside outside Billericay are displaced elsewhere in the Borough. Total cost £9.1m, which would equate to a 'contribution' of around £5,230 for each new dwelling.

Highways – the Local Plan Highway Mitigation Modelling carried out by consultants acting for Essex County Council includes a number of potential road improvement schemes, which represent some short-term and long-term options to mitigate the impact of future growth on the highway network. However, the IDP acknowledges that as there are a range of options available, the total cost of mitigating the impact of the chosen allocations could range from a minimum of £43m to a maximum of £234.2m.

Ruling out the lower and higher figure (for the reasons set out in paragraphs 4.6.5 and 4.6.6 of the IDP), the Council has concluded that the actual recommended cost of the required options to improve the road network, as set out in the mitigation modelling, is likely to be between £110m - £190m.

Five highway improvement schemes would be required in the Billericay area to mitigate the anticipated increase in traffic brought about by the proposed site allocations. These are:

- Removal of Laindon Road one-way system - £200k
- Signalisation at Sun Street corner - £1.1m
- Left turn filter land at Sun Corner - £600k
- Roundabout on Mountnessing Road (junction with A129) - £600k
- Western link road - £65m.

The total cost of the above schemes would be £67.5 million, which would equate to a 'contribution' of around £38,793 for each new dwelling, if funded entirely by new development.

Health – the IDP acknowledges that all current GP practices in the Billericay area are currently at capacity and that accommodating up to 4,600 additional residents would be likely to require the provision of additional GP practice space of around 260 square metres, at a total cost of £500,000, which would equate to a 'contribution' of £285 for each new dwelling. In addition the IDP also acknowledges that, although funding for acute health care such as hospitals is centrally funded by government, the Clinical Commissioning Group has not yet provided any details of what funding streams may be available to support necessary upgrades to primary care facilities. The total cost of additional health facilities and expansion of existing facilities to support the identified growth is expected to be £1.88m, and that these costs would need to be met in full through planning contributions.

Public Transport – the IDP states that: *“to date, Network Rail has not provided a detailed response in terms of its infrastructure plans or requirements within Basildon Borough”, and that, “Abellio currently operate railway services on the Greater Anglia line serving Billericay and Wickford – the services on this line are currently up for franchise and again it has not been possible to gather information on the infrastructure requirements of service providers at this time.”*

Given the presumption in favour of sustainable development contained in the NPPF, it seems incomprehensible that the Council can proceed with such significant housing site allocations around Billericay when they have no idea about the future infrastructure plans of either Network Rail or Abellio. The existing rail services from Billericay during the rush hour are at capacity and a high percentage of the additional 4,400 people that would be living in the town are likely to be rail commuters. If there are no plans to improve passenger capacity in the near future, then it is very likely that both existing and new residents will resort to the use of the private car to drive to better served rail stations. This situation would be completely at odds with the Council's transport strategy (as set out in Policy TS1).

- 2.18 A final point on infrastructure concerns the scope or catchment of the Billericay area. The Steeple View area of Basildon is within Crouch Ward, however, residents' feedback during the Local plan process has revealed that a large proportion of the residents in this locality use Billericay as their local town centre and tend to use its services and facilities rather than those of other areas within the Borough. BDRA believes that this reality should be taken into account when Billericay's infrastructure enhancement needs are considered.

Affordable Housing

- 2.19 The draft Local Plan (Policy H34) states that 25% of all new housing will have to be 'affordable'. BDRA notes the latest Government initiative to move away from the traditional notion of 'affordable' housing, preferring instead for developers to provide housing for first-time buyers, at discounted market prices. As it currently stands therefore, the content of Policy H34 needs to be updated to reflect the latest Government initiative.

-
- 2.20 BDRA would oppose the position where developers are allowed to 'off-set' contributions for affordable housing elsewhere in the Borough, rather than providing affordable housing in Billericay as part of allocated housing sites. This contradicts the Plan's stated aim of providing homes for future generations so that they do not have to move away from their home town.

3. DRAFT TRANSPORT STRATEGY POLICIES

- 3.1 The NPPF requires local planning authorities to set out policies aimed at creating a transport system that is balanced in favour of sustainable transport modes – i.e. walking, cycling and public transport. BDRA question how this basic policy requirement can be achieved by new housing allocations on Green Belt sites on the very edge of the town, distant from the main railway station and town centre. The town is also characterised by being less suited to cycling as a means of transport because of its hilly nature, which would need to be recognised and addressed in any local cycling strategy.
- 3.2 Policy TS1 states that during the Plan period the Council will seek to deliver improved accessibility to jobs, services and facilities via an enhanced and better integrated transport network. This is hoped to be achieved through a number of measures, including: well-located new development; the use of 'travel plans'; partnership working with public transport providers; and working with the County Council as highway authority to deliver new transport infrastructure. Given our comments on Public Transport on the previous page, it is very difficult for residents of Billericay who use public transport to see how these measures would actually become reality, given that partnership working with public transport providers is virtually non-existent at the moment. BDRA would like to see how public transport services, which are currently at capacity, will be improved to accommodate new and existing residents before any new houses are built on allocated sites.
- 3.3 Policy TS1 seems to be making the right statements, but there is no clear evidence in the draft Local Plan (or its supporting documents) that the public transport elements of the strategy will be achieved without positive and active input from the public transport providers. BDRA therefore object to this element of the draft Local Plan as the policy is simply not deliverable on the basis of the current evidence base.
- 3.4 Policy TS2 concerns improvements to carriageway infrastructure and the key piece of highway infrastructure that is proposed for Billericay is the new relief road to the south-west of the town (between the A129 London Road and Laindon Road). Paragraph 9.33 of the draft Local Plan states that this road would relieve already congested junctions at Sun Street/High Street and the A129 Southend Road/A176 junction. The new relief road would be largely provided through the use of 'spine' roads serving new residential site allocations (H20, H21 and H23), and the Council expect that the full cost of providing the relief road (including junction improvements), would be met by housing developers as they bring sites forward for development.

-
- 3.5 BDRA are very concerned with this approach, as it seems clear that the new relief road will not be provided in its entirety until the majority of the proposed housing site allocations in question have been completed. BDRA also have concerns about the ability of the Council to 'pool' the financial contributions necessary (some £65m) to ensure the whole road is built. BDRA also fear that developers may argue that the cost will render the housing allocations unviable in economic terms, particularly when faced with CIL and other contributions. In our experience, in such circumstances developers always seek to reduce the amount of affordable housing to be provided when viability is questioned. BDRA would strongly resist such an approach by developers and insist that if these housing allocations survive the Examination stage, that the Council seek to ensure that the relief road is constructed in its entirety at the earliest possible stage in the development process – failure to do this will result in unacceptable traffic congestion within the town.
- 3.6 BDRA also believe that the route of the proposed southern relief road should connect directly to the Kennel Lane roundabout (on the A176), and that the introduction of two-way traffic along the southern section of Laindon Road would only bring dis-benefits to the town. This section of road is close to three existing schools and numerous community facilities and the BDRA believe that Laindon Road could not safely cope with this increased traffic.
- 3.7 BDRA are also very concerned about the absence of road improvements north of the A129, as the proposed housing developments to the south-west of the town and the new southern relief road will also increase traffic in the northern half of the town. Particular areas of concern are:
- The ability of the Mountnessing Road/Perry Street/Queens Park Avenue route, and the various junctions along this route, to cope with the expected increase in traffic volume;
 - The junction of Radford Way and Stock Road.
- 3.8 BDRA also note that Chelmsford City Council share their concerns about the increased traffic that would be generated by sites H19a and H19b (potentially up to 150 dwellings), and its impact on the surrounding road network to the north⁵. The BDRA believe that the evidence shows that there would be a significant impact on the Potash Road roundabout (junction with Stock Road), which suggests that large volumes of traffic will travel north along the B1007 towards the A12, through Stock. Chelmsford City Council expressed similar concerns on this matter at the Core Strategy Revised Preferred Options stage, on the basis that such increased levels of traffic through Stock would be harmful to the amenities of the area. They were also concerned that the local road network through the village is insufficient to deal with the additional traffic that would be generated.
- 3.9 On several matters of detail relating to the Transport Strategy, the BDRA would also make the following comments:
- The staggered junction at Grange Road/Southend Road/Outwood Common Road will need improvement if the proposed housing allocations go ahead;
 - In the event of junctions improvements at Sun Corner the existing drainage problems should be rectified; and

⁵ Chelmsford City Council, Development Policy Committee, Agenda Item 9 – 03/03/2016

-
- Controlled pedestrian crossings or footbridges should be installed where necessary to promote pedestrian safety in and around new road layouts, particularly in the vicinity of schools.
- 3.10 Draft Transport Policy TS4 concerns improvements to public transport infrastructure and services. BDRA would again re-iterate the earlier comments made in this report in respect of public transport infrastructure and ask the Council to note the following key points:
- Billericay is a commuter town that relies heavily on the rail service to London and it is imperative that a high quality, adequate (in terms of meeting capacity now and in the future), train service is provided;
 - Trains are presently unacceptably overcrowded in the morning and evening rush hours and other proposed housing developments to the east of Billericay (e.g. Wickford and Southend Airport) will only add to the congestion problem;
 - Crossrail is mentioned as a potential source of improvement to rail services for Billericay, to and from London, however, this assumption is erroneous because Crossrail trains will run from Shenfield Station and stop at all stations, which will be significantly slower than existing services from Billericay which make fewer stops;
 - The draft Local Plan states that the Council will work with rail providers to secure investment in services which will accommodate the proposed growth. BDRA considers this position to be inadequate and a weak statement of intent. The Local Plan should state unequivocally that planning permission for any new housing developments will be dependent on a corresponding increase in rail passenger capacity that is both planned and fully funded.
- 3.11 Draft Transport Policy TS8 concerns parking standards. BDRA is acutely aware from its members that town centre and railway station parking is currently totally inadequate to meet current demand, and this situation will inevitably worsen with an increase in population. The Local Plan should offer specific solutions to deal with this issue, acknowledging that increased use of cycling as a mode of transport will only have a very limited impact as a strategy, because of the hilly nature of the town.
- 3.12 On a related matter, Employment Policies E2 and E3 state that the land currently occupied by the public car park in Radford Crescent should be designated for business use. However, there is no mention of re-providing this parking facility elsewhere in the area. This change would significantly diminish parking capacity in this key location close to the station, unless a new car park is provided elsewhere. BDRA are therefore strongly opposed to this draft proposal.

4. DRAFT HEALTHY COMMUNITIES POLICIES

- 4.1 Policy HC5 concerns the provision of public open space and paragraph 4 of the policy suggests that the Council will not consider the allocation of 'Local Green Space' within the Local Plan, preferring instead to rely on Neighbourhood Plans to identify such areas. BDRA do not support this approach and notes that paragraph 76 of the NPPF makes it clear that local communities should be able to identify areas of 'local green space' through **both** local and neighbourhood plans. Given the onerous requirements (and costs) involved in the preparation of Neighbourhood Plans and their poor take up by local communities, BDRA believe that the Local Plan should be used to designate areas of 'local green space' to ensure consistency across the Borough.
- 4.2 Policy HC6 concerns allotment gardens and the BDRA supports such a policy being included in the Local Plan. The draft policy makes reference to the proposed housing site allocations (H7 – H27) and the fact that new allotments could be created as part of these developments. However, the BDRA believes that this policy should be strengthened to acknowledge that Billericay currently has no allotment gardens. The best way to do this may be through the inclusion of a specific requirement for the provision of allotments within all the proposed housing site allocations in Billericay (H19 – H27). The BDRA would also recommend that on housing sites capable of accommodating 100 homes or more, 10% of the net site area should be given over to the provision of allotment gardens.

5. DRAFT RETAIL POLICIES

- 5.1 Policy R6 of the draft Local Plan concerns Billericay Town Centre Enhancement and paragraph 8.59 notes that there are very few areas of public open space in the town centre, and the High Street is dominated by traffic. BDRA would concur with this view.
- 5.2 The Retail and Commercial Leisure Study, which supports the evidence base for the draft Local Plan recommended that the town centre could benefit from the introduction of a second supermarket, in the form of a 'local store format', to improve consumer choice. BDRA do not support this proposal. There are already a number of retail food outlets in the High Street and previously, several smaller/medium supermarkets (notably the Co-operative and Somerfield), have closed – presumably for economic reasons, but certainly exacerbated by the lack of available/free car parking.

6. CONCLUSIONS

- 6.1 This response strongly objects to the above policy areas in the draft Local Plan for the following reasons:
- i) the proposed housing site allocations would have a severely detrimental impact on the character and setting of Billericay and result in the extensive loss of valuable Green Belt land, which serves to meet the five main purposes of its designation, as set out in the National Planning Policy Framework (NPPF);

-
- ii) the scale of housing growth proposed is excessive and the Council has not fully taken into account the constraint imposed by the Green Belt around Billericay, which clearly indicates that new, large scale housing site allocations should be restricted;
 - iii) the evidence base that underpins the draft Local Plan does not give sufficient weight to the importance that should be accorded to existing Green Belt areas and the BDRA remains unconvinced that the Council have satisfactorily demonstrated sufficient 'exceptional circumstances' to justify the release of Green Belt land for development on the scale proposed;
 - iv) the Council have not fully considered whether meeting the 'objectively assessed need' for housing would result in such adverse to the character and purpose of the Green Belt that these impacts would significantly and demonstrably outweigh the benefits, when assessed against the NPPF as a whole;
 - v) the Infrastructure Delivery Plan is inadequate and unfit for purpose because it does not adequately cover future investment in public transport – specifically rail services – and this is contrary to the requirements set out in the NPPF;
 - vi) insufficient consideration has been given to the timing and provision of the proposed infrastructure and the need to ensure that highway improvements are implemented in advance of significant new housing areas being developed;
 - vii) there is a strong likelihood that the cumulative impact of CIL, section 106 contributions and other requirements, will significantly weaken the Council's ability to deliver the required 'planning gains' for each proposed housing site through the planning process.