

LOCAL PLAN - CONSULTATION ON NEW SITES AND ALTERNATIVE SITES FOR THE BASILDON BOROUGH LOCAL PLAN

CONSULTATION RESPONSE FORM

All comments for the New Sites and Alternative Sites Consultation must be made on this form. You must complete page 1 once. You must complete a copy of page 2 for each individual site on which you are commenting.

Once you have completed the form, please return it by post or by hand to:

Local Plan - Consultation on New Sites and Alternative Sites 2016
Planning Policy Team
Basildon Borough Council
The Basildon Centre
St Martin's Square, Basildon, Essex, SS14 1DL

Alternatively, email responses should be sent to: planningpolicy@basildon.gov.uk

To be considered, all submissions must be received by the closing date and time at **23:59 on 15 December 2016.**

YOUR CONTACT DETAILS – For your views to be considered as part of the Local Plan consultation you must provide your full name and full address. We are unable, by law, to consider anonymous submissions.

Full name: Mr/Mrs/Ms/Miss/Dr Mr J D Jennings on behalf of **the Billericay District Residents Association (BDRA),**

Billericay Action Group and the Billericay Society

Address (including postcode): Cheffins Planning and Development, Clifton House, 1 & 2 Clifton Road,

Cambridge, CB1 7EA

If you would like us to send you email updates on the Local Plan and the consultation, please provide your email address:

jon.jennings@cheffins.co.uk

ABOUT YOU - The following questions are designed to help us understand a little more about people who respond and your interest in the Local Plan. These questions are not compulsory and do not have to be completed.

YOUR RELATIONSHIP WITH THE BOROUGH

Do you live in the Borough?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Prefer not to say <input type="checkbox"/>
Do you work in the Borough?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Prefer not to say <input type="checkbox"/>
Do you own or operate a business in the Borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Prefer not to say <input type="checkbox"/>
Do you currently study at a facility within the Borough?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Prefer not to say <input type="checkbox"/>

PLEASE TELL US...

What is your gender?

.....Male.....

What is your ethnicity?

.....White.....

What year were you born?

.....1969.....

Did you experience any difficulty responding to this consultation as a result of a disability or ill health?

YOUR CONSULTATION RESPONSE

Please complete a separate copy of page 2 only for each site on which you are making a representation.

1. Please insert the site name and number, as found on the consultation documents to which this representation refers:

New Site 1 Brooklands Farm, Billericay

2. Please indicate the nature of your representation in relation to this site:

Object

Support

Technical Comment

3. Please provide details of your representation below (continue onto a separate sheet as necessary).

INTRODUCTION

These representations have been prepared on behalf of the Billericay District Residents' Association (BDRA), Billericay Action Group and the Billericay Society by Cheffins Planning and Development in relation to the Basildon Council's Local Plan New and Alternative Site consultation. Cheffins have been instructed to provide detailed objections to the three alternative sites and the four new sites within Billericay.

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Many of the comments that were made in previous representations are still applicable to this latest consultation on the housing section of the Council's draft Local Plan, particularly:

- The importance of maintaining the 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,
- Specific comments on several of the proposed housing areas (several of which are now proposed for expansion as a result of this current consultation).

Our previous and current objections are still based on the detrimental impact that the existing proposed housing site allocations will 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). The adverse impacts on the Green Belt and landscape will unquestionably be exacerbated if any of the additional sites currently being consulted on are allocated in addition to those already identified.

These objections also discuss the likely impact of the proposed housing site allocation and these additional sites on the town's infrastructure, which is already inadequate in a number of key service areas.

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Whilst it is noted there is significant commentary being made as to the actual housing needs of the Borough it is the task of the Inspector via the examination of the plan to confirm the actual numbers and the locations to which development should be directed. It must also be noted that the Borough has significant constraints, particularly with regards to Green Belt, and it may actually prove difficult to accommodate the scale of development envisaged. This is particularly the case with Billericay which is surrounded by unspoilt open countryside and comprises an attractive landscape which is particularly sensitive to change.

It is noted that Policy SD1 of the emerging Local Plan states that *"In order to accommodate the remainder of the growth, the Green Belt has been reviewed to make provision for around 8,000 to 8,500 new homes and 11 to 14 ha of employment land. The review has ensured that the purpose of the wider Green Belt is maintained, and that those parts of the Green Belt of higher landscape and/or ecological value are protected, and enhanced where possible, in accordance with the NPPF. A sequential approach to flood risk has also been taken, and those areas at greatest risk of flooding will be avoided"*. The requirements of Policy SD1 need to be applied to the current consultation.

An initial analysis of the sites by either the Borough Council or the County Council to understand their views as to the appropriateness of the sites would have been beneficial and allowed objectors to be aware of technical constraints, such as highway capacity. This would have answered some of the questions about the sites being consulted upon and given a greater steer as to the suitability of each site for development.

It is considered that the importance of protecting the wider Green Belt as well as areas of higher landscape and ecological value should be a major consideration in the identification of sites and should take precedence over the need for housing.

It is also worth noting that the majority of sites being promoted via this consultation are adjoining Billericay. This is an example of the desirability of Billericay as a preferred location for development as opposed to other towns within the Borough.

Whilst, there is considerable comment as to the provision of a western relief road it is clear that the landscape impacts of providing this route need to be considered and is the provision of a substandard route really the most appropriate way to address traffic problems. As part of this consideration is the capacity of the highway network a justification for further limiting development, especially if development is unwilling or unable to fund the costs of the undoubted highway upgrades which will need to facilitate even a modest scale of additional housing.

Finally, in considering the sites proposed in Billericay, the Council must have regard to the unquestionable adverse impacts that development will have not only on the attractive landscape but also the Green Belt. These should not be sacrificed without a proper and full consideration of the impacts of development.

New Site 1 Brooklands Farm

The paucity of information submitted in relation to this proposed new site makes it very difficult to reach a judgement as to the actual scale of development which could be provided on this site and more importantly the benefits it could bring to Billericay. It also does not provide information as to how any of the evident constraints associated with a development of this scale could be mitigated.

This proposed new site is also predicated on Site H27 being supported and allocated by an Inspector via the examination of the Local Plan.

This proposed site forms part of the larger area entitled Area 27 in the Basildon Borough Landscape Character Assessment and Green Belt Landscape Capacity Study. Following this assessment a smaller site known as Site 28 was assessed in the December 2015 Basildon Outline Landscape Appraisals of Potential Strategic Development Sites. This forms the basis of Site H27 in the emerging Local Plan.

The constraints associated with the analysis of Area 27 by way of the Basildon Borough Landscape Character Assessment and Green Belt Landscape Capacity Study 2014 are still pertinent to the consideration of New Site 1. This analysis identified the following issues associated with the western part of the area now being proposed for allocation and New Site 1 which forms the eastern part of the area. The issues identified were

Qualities to be safeguarded

- Irregular field pattern of medieval origin still largely intact
- Strong tree lined hedgerows to all fields boundaries provides good enclosure
- Established linear but piecemeal settlement pattern off Coxes Farm Road including some listed buildings and others within mature garden plots
- Area of regenerated scrub/woodland to north west on higher ground.
- Elevated area of undeveloped high ground beyond existing built limit of South Green /Billericay which is visible in views from across Upper Crouch Farmland to south east.
- Some slopes visually very prominent.

This appraisal also provides further justification for the rejection of New Site 1 in that *"The lower lying and gently sloping land to the west and along the stream is more enclosed from the wider landscape. The most elevated and prominent ground is to the north east.* This is a direct reference to the northern half of New Site 1.

The December 2015. Basildon Outline Landscape Appraisals of Potential Strategic Development Sites in reviewing Site 28 (proposed allocation H27) states that *"Site 28 is a small part to the western edge of Area 27 in the Green Belt Landscape Capacity Study. Area 27 extends further east encompassing all of the land framed by Coxes Farm Road, Outwood Farm Road and Outwood Common Road.*

Area 27 as a whole was assessed as having a low relative landscape capacity rating and high sensitivity. This was due to the elevated and prominent nature of the landform across the area, the limited relationship with the existing urban fabric and the role of the landscape in retaining the sense of separation between the settlements of South Green and Billericay/ Sunnymede".

This appraisal also notes that H27 is gently sloping and more visually contained by surrounding hills than the wider Area 27. The site also has a direct association with the existing built edge of South Green and is well contained from the green finger of landscape that has an important role in preserving the separation between settlements. Therefore, Site 28 [proposed allocation H27] is considered less sensitive than Area 27 as a whole. This formed the basis for the western part of Area 27 being identified for development. Whilst the residents' groups already have significant and valid objections to the allocation of this site, New Site 1 has even more unacceptable impacts which due to the topography and existing landscape will be very difficult to ameliorate.

Access to the site would need to be taken from Outwood Common Road. This is a very narrow road, which is tree lined with no potential for the road to be widened without the loss of numerous trees. A similar issue would

arise if an access was to be created from this road into New Site 1. Therefore, access would need to be derived via the proposed allocation H27 from Southend Road. This could result in a ransom situation being created raising questions as to both the viability and ultimately deliverability of the proposed New Site 1

There are significant concerns as to the impact that development would have on the area of woodland located in the north west corner of the site. The north-western corner of the woodland has already been eroded by residential development. This is not just from increased activity from residential development immediately adjoining the woodland but also predation from domestic pets.

The allocation of this land would further enclose the cone of land which lies to the east of Billericay, Mill Meadows, effectively narrowing the linkages from this site to the open countryside. This is an important issue especially as Mill Meadows is designated as both a SSSI and a LNR. The allocation of this site in conjunction with other sites on the east of Billericay will also harm the ecological and amenity value of this area from increased public use. It is also important to note that the land to the north of the New Site 1 is considered to represent the highest value Green Belt and its fringes should not be adversely impacted upon by sprawling development which is unrelated to the existing built form of Billericay.

There are already significant floodwater capacity issues associated with the smaller site and due to the elevated nature of New Site 1 this constraint is likely to be exacerbated.

Conclusion

In conclusion, there are clearly negative landscape impacts associated with the allocation of this site which will exacerbate the impacts already arising from the proposed allocation H27. This development will clearly encroach into the open countryside and high value Green Belt and lead to the coalescence of Sunnymede with South Green. It will also have significant and undesirable ecological impacts upon both the site and the wider area. Finally, there are questions as to the capacity of the local highway network to accommodate the scale of development proposed.

YOUR CONSULTATION RESPONSE

Please complete a separate copy of page 2 only for each site on which you are making a representation.

3. Please insert the site name and number, as found on the consultation documents to which this representation refers:

New Site 2 Foots Farm, Billericay

4. Please indicate the nature of your representation in relation to this site:

Object

Support

Technical Comment

4. Please provide details of your representation below (continue onto a separate sheet as necessary).

INTRODUCTION

These representations have been prepared on behalf of the Billericay District Residents' Association (BDRA), Billericay Action Group and the Billericay Society by Cheffins Planning and Development in relation to the Basildon Council's Local Plan New and Alternative Site consultation. Cheffins have been instructed to provide detailed objections to the three alternative sites and the four new sites within Billericay.

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Many of the comments that were made in previous representations are still applicable to this latest consultation on the housing section of the Council's draft Local Plan, particularly:

- The importance of maintaining the 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,
- Specific comments on several of the proposed housing areas (several of which are now proposed for expansion as a result of this current consultation).

Our previous and current objections are still based on the detrimental impact that the existing proposed housing site allocations will 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). The adverse impacts on the Green Belt and landscape will unquestionably be exacerbated if any of the additional sites currently being consulted on are allocated in addition to those already identified.

These objections also discuss the likely impact of the proposed housing site allocation and these additional sites on the town's infrastructure, which is already inadequate in a number of key service areas.

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It is noted that Policy SD1 of the emerging Local Plan states that *"In order to accommodate the remainder of the growth, the Green Belt has been reviewed to make provision for around 8,000 to 8,500 new homes and 11 to 14 ha of employment land. The review has ensured that the purpose of the wider Green Belt is maintained, and that those parts of the Green Belt of higher landscape and/or ecological value are protected, and enhanced where possible, in accordance with the NPPF. A sequential approach to flood risk has also been taken, and those areas at greatest risk of flooding will be avoided"*. The requirements of Policy SD1 need to be applied to the current consultation.

An initial analysis of the sites by either the Borough Council or the County Council to understand their views as to the appropriateness of the sites would have been beneficial and allowed objectors to be aware of technical constraints, such as highway capacity. This would have answered some of the questions about the sites being consulted upon and given a greater steer as to the suitability of each site for development.

It is considered that the importance of protecting the wider Green Belt as well as areas of higher landscape and ecological value should be a major consideration in the identification of sites and should take precedence over the need for housing.

It is also worth noting that the majority of sites being promoted via this consultation are adjoining Billericay. This is an example of the desirability of Billericay as a preferred location for development as opposed to other towns within the Borough.

Whilst, there is considerable comment as to the provision of a western relief road it is clear that the landscape impacts of providing this route need to be considered and is the provision of a substandard route really the most appropriate way to address traffic problems. As part of this consideration is the capacity of the highway network a justification for further limiting development, especially if development is unwilling or unable to fund the costs of the undoubted highway upgrades which will need to facilitate even a modest scale of additional housing.

Finally, in considering the sites proposed in Billericay, the Council must have regard to the unquestionable adverse impacts that development will have not only on the attractive landscape but also the Green Belt. These should not be sacrificed without a proper and full consideration of the impacts of development.

This proposed site forms part of the area entitled Area 72 in the Basildon Borough Landscape Character Assessment and Green Belt Landscape Capacity Study 2014. This assessment advises that in terms of residential development there was only a "Limited opportunity due to open character and impact on separation between Great Burstead and Crays Hill and Basildon. Only potential opportunity is opposite ribbon development along Southend Road, in the north west corner of the area near Great Burstead". These comments were clearly not a glowing endorsement of this area's suitability for development.

The Area 72 assessment identified the following qualities which needed to **be safeguarded**

- Rectilinear field system of ancient and possibly Saxon origin – has suffered from some boundary loss but still intact as structure
- Hedgerows following the historic field pattern where still present
- Open rural character between Great Burstead and Crays Hill settlements
- Public rights of way leading through Guarnards Farm and along the line of stream to north
- Views to Grade I listed St Mary Magdalene Church, Great Burstead to west
- Panoramic views to north towards wooded ridge
- Views from Southend Road over Basildon/Laindon

The site promoter's proposal to provide extensive compensatory landscaping recognises that site will have significant impacts due to its open character and that it only has tentative links to Billericay

The Area 72 Assessment states that *"There are two commercial areas Guildprime Business centre on Southend Road and one in the centre of the area at Gurnards Farm. Both of these features are on prominent higher ground and unsympathetic in the open landscape. To the south there is an area of playing fields occupied by Intersports Football Club and adjacent Barleylands Garden Centre and Farm Shop"*. Whilst these uses are quoted within the site assessment, the degradation of the landscape was not considered sufficient justification for the allocation of this site

Site 72 has been assessed via the Basildon Borough Green Belt Review 2015 (December 2015). This review uses four purposes for including land in the green belt. These four purposes are

Purpose 1 To check unrestricted sprawl of large built-up areas

Purpose 2 To prevent neighbouring towns from merging into one another

Purpose 3 - To assist in safeguarding the countryside from encroachment

Purpose 4 To preserve the setting and special character of historic towns

Purpose 1 To check unrestricted sprawl of large built-up areas

The Green Belt Review has considered Area 72 and in relation to Purpose 1 it is stated that the site partly contributes to this purpose. The Green Belt reviews states that "Areas which were identified as partly contributing to this purpose have experienced a limited degree of sprawl. In many circumstances the current urban/rural boundary has not been as effective in preventing the urban area from expanding into these Green Belt areas. However, these Green Belt areas still contain land which has been unaffected by sprawl and their designation as Green Belt helps to prevent the occurrence of more sprawl into the undeveloped parts of the area. As shown in Figure 8, all urban areas have expanded beyond their boundaries to some extent and there is evidence of sprawl from them into the surrounding countryside". This assessment is particularly relevant to this site in that the development will extend development south of Billericay which is not related to the rounding off of the settlement and will represent the reinforcement of the ribbon development to the south of Billericay.

Purpose 2 To prevent neighbouring towns from merging into one another

This area is correctly identified in the Green Belt Review as representing one of the key areas of Green Belt around the Borough which contribute to preventing neighbouring towns from merging into one another. The assessment also states that *"Those areas which contribute to the preventing coalescence are located within the narrow but*

strategically important rural breaks between the urban areas. If any one of these areas were released in full for development two neighbouring settlements would either physically merge or be perceived as merging. Green Belt areas within the centre of the Borough help maintain the separation of Basildon and Billericay, Basildon and Crays Hill, Basildon and Wickford, Wickford and Ramsden Bellhouse, Wickford and Crays Hill and Billericay and Crays Hill". The development of this site will undoubtedly compromise the objectives of this purpose in that it will erode the gaps between Great Burstead and Crays Hill and Basildon. The provision of planting whilst enhancing the Green Belt will not prevent the physical erosion of the gap between settlements. The gap between Great Burstead and Crays Hill is clearly very important and the reinforcement of the development along Southend Road and to the east will compromise this very important gap between settlements which will be reduced from 2.1km to 1.7km. The loss of this site unquestionably comprises the green belt purpose of preventing neighbouring towns from merging into one another.

Purpose 3 - To assist in safeguarding the countryside from encroachment

The Green Belt review states that "The majority of the Borough's Green Belt areas partly contribute to assisting in safeguarding the countryside from encroachment. The assessments found that many areas contain some development, such as residential development, or infrastructure such as overhead power lines and major roads, which detract from the openness of the countryside and would be classed as encroachment. However parts of these areas still consist of agricultural land, fields, woodland, open space and/or marshland which are valued countryside and should be safeguarded".

Paragraph 6.14 states that "Areas that were reported as contributing to this purpose, may have contained farmsteads and other associated buildings which are compatible with a countryside setting, but they didn't contain development or infrastructure that detracted from the openness of the countryside. As shown in Figure 10 they were predominantly located towards the west and northwest of the Borough around Billericay".

The review has advised that the site partly compromises this purpose and New Site 2 would unquestionably provide development on a greenfield site which clearly has an open countryside character as opposed to adjoining the urban edge of Great Burstead/Billericay.

Purpose 4 To preserve the setting and special character of historic towns

It is recognised that this purpose is not relevant to this site

The Basildon Borough Green Belt Review 2015 states that "Of the 73 Green Belt areas, 1 area was found to significantly contribute to the role and function of the Green Belt, 43 were found to make a partial contribution, 29 were found to make a limited contribution and no areas made no contribution".

The advice contained within paragraph 7.3 of the Green Belt Review is particularly relevant to this site and states that "*Many of the areas that make a partial contribution to the role and function of the Green Belt are important for the strategic role they play in maintaining the separation of settlements. However, they may include instances of development within them which is considered to be sprawl from the urban area or encroachment, or both which detract from the openness of the Green Belt, or they are not near a historic settlement. It is not possible to make an area contribute to preserving a historic settlement if it is not near one however it may be possible to improve an area's contribution to safeguarding the countryside from encroachment or checking urban sprawl if the urban/rural boundary was amended and strengthened to remove the instances that detract from the countryside". This site is clearly not proposing to check sprawl or safeguard the countryside from encroachment.*

The site is also a considerable distance from the main centre of Billericay dissuading trips by foot and cycle. In terms of other sites being promoted this site is clearly less sustainable and will not allow alternatives to the private car to be utilised via the emerging local plan.

Conclusion

This site is clearly not suitable for allocation and will represent an isolated finger of development into the open countryside which will erode the gap between Great Burstead and Crays Hill compromising one of the main

purposes of including the land within the Green Belt. The site is unrelated to the town and represents sprawl. The proposed landscaping whilst enhancing the Green Belt will not offset the loss resulting from the physical erosion of this gap. For the above reasons it is contended that this site should be rejected.

YOUR CONSULTATION RESPONSE

Please complete a separate copy of page 2 only for each site on which you are making a representation.

5. Please insert the site name and number, as found on the consultation documents to which this representation refers:

New Site 3 Maitland Lodge, Billericay

6. Please indicate the nature of your representation in relation to this site:

Object

Support

Technical Comment

5. Please provide details of your representation below (continue onto a separate sheet as necessary).

INTRODUCTION

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- The likelihood of such high levels of housing growth being delivered in the Plan period; and,
- Specific comments on several of the proposed housing areas (several of which are now proposed for expansion as a result of this current consultation).

Our previous and current objections are still based on the detrimental impact that the existing proposed housing site allocations will 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). The adverse impacts on the Green Belt and landscape will unquestionably be exacerbated if any of the additional sites currently being consulted on are allocated in addition to those already identified.

These objections also discuss the likely impact of the proposed housing site allocation and these additional sites on the town's infrastructure, which is already inadequate in a number of key service areas.

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It is noted that Policy SD1 of the emerging Local Plan states that *"In order to accommodate the remainder of the growth, the Green Belt has been reviewed to make provision for around 8,000 to 8,500 new homes and 11 to 14 ha of employment land. The review has ensured that the purpose of the wider Green Belt is maintained, and that those parts of the Green Belt of higher landscape and/or ecological value are protected, and enhanced where possible, in accordance with the NPPF. A sequential approach to flood risk has also been taken, and those areas at greatest risk of flooding will be avoided"*. The requirements of Policy SD1 need to be applied to the current consultation.

An initial analysis of the sites by either the Borough Council or the County Council to understand their views as to the appropriateness of the sites would have been beneficial and allowed objectors to be aware of technical constraints, such as highway capacity. This would have answered some of the questions about the sites being consulted upon and given a greater steer as to the suitability of each site for development.

It is considered that the importance of protecting the wider Green Belt as well as areas of higher landscape and ecological value should be a major consideration in the identification of sites and should take precedence over the need for housing.

It is also worth noting that the majority of sites being promoted via this consultation are adjoining Billericay. This is an example of the desirability of Billericay as a preferred location for development as opposed to other towns within the Borough.

Whilst, there is considerable comment as to the provision of a western relief road it is clear that the landscape impacts of providing this route need to be considered and is the provision of a substandard route really the most appropriate way to address traffic problems. As part of this consideration is the capacity of the highway network a justification for further limiting development, especially if development is unwilling or unable to fund the costs of the undoubted highway upgrades which will need to facilitate even a modest scale of additional housing.

Finally, in considering the sites proposed in Billericay, the Council must have regard to the unquestionable adverse impacts that development will have not only on the attractive landscape but also the Green Belt. These should not be sacrificed without a proper and full consideration of the impacts of development.

New Site 3 Maitland Lodge

It is recognised that the supporting documentation accompanying this submission makes reference to the HELAA stating that the site is suitable, available and achievable for development. However, this documentation does not refer to the sites location in the Greenbelt and does not accord with the findings of the 2015 Green Belt Review. The commentary relating to the SHLAA, which predates the HELAA, is poignant where it is stated *"This site is located within a valued area of the green belt and will not be considered through the SHLAA at this time. As part of the Council's methodology the boroughs green belt has been considered on its merits and specific areas identified where development could significantly undermine the value of the green belt"*.

It is also contended as to whether the site constitutes previously developed land, with only the eastern boundary of the site being occupied by a miscellaneous group of buildings. The majority of site is clearly greenfield. This view is confirmed by the SHLAA referring to only 0.28ha of the 1.35ha being previously developed.

Whilst it is stated that the site is 2km from many local facilities, Billericay town centre is more than 3.0km from the site, which is clearly not accessible by foot or cycle.

The promotional document states that an access can be achieved onto Southend Road, albeit no information has been provided to demonstrate whether the requisite visibility splays could be provided, particularly to the north. This technical issue needs to be addressed. There are also further questions as to the suitability of the site with local residents stating that the site is susceptible to flooding.

Whilst a considerable amount of commentary is made regarding the need for additional housing in Billericay, this site is only proposing a yield of 44 dwellings, which is inconsequential when compared with the proposed level of housing required.

This site has been assessed via the Basildon Borough Green Belt Review 2015. This review uses four purposes for including land in the green belt. These four purposes are

- Purpose 1 To check unrestricted sprawl of large built-up areas
- Purpose 2 To prevent neighbouring towns from merging into one another
- Purpose 3 - To assist in safeguarding the countryside from encroachment
- Purpose 4 To preserve the setting and special character of historic towns

Purpose 1 To check unrestricted sprawl of large built-up areas

The Green Belt Review has assessed this site as forming part of Area 25 and in relation to Purpose 1 To Check the Unrestricted Sprawl of large built up areas it is stated that the site partly contributes to this purpose. The Green Belt reviews states that *"Areas which were identified as partly contributing to this purpose have experienced a limited degree of sprawl. In many circumstances the current urban/rural boundary has not been as effective in preventing the urban area from expanding into these Green Belt areas. However, these Green Belt areas still contain land which has been unaffected by sprawl and their designation as Green Belt helps to prevent the occurrence of more sprawl into the undeveloped parts of the area. As shown in Figure 8, all urban areas have expanded beyond their boundaries to some extent and there is evidence of sprawl from them into the surrounding countryside"*.

This assessment is particularly relevant to this site in that the allocation of this site will extend development south of Billericay and is not related to a strong and clear definition between the urban area and the open countryside. Whilst, the existing boundary on the west of the site is strong more sporadic landscaping exists to the south. The allocation of this site will result in further sprawl with pressure for the larger site to the west of the site to come forward for development.

Purpose 2 To prevent neighbouring towns from merging into one another

This site is very similar in character to site 73 (New Site 2) and its loss would result in coalescence between Great Burstead and Crays Hill. The commentary relating to this classification states that *"Those areas which contribute*

to the preventing coalescence are located within the narrow but strategically important rural breaks between the urban areas. If any one of these areas were released in full for development two neighbouring settlements would either physically merge or be perceived as merging. Green Belt areas within the centre of the Borough help maintain the separation of Basildon and Billericay, Basildon and Crays Hill, Basildon and Wickford, Wickford and Ramsden Bellhouse, Wickford and Crays Hill and Billericay and Crays Hill".

The gap between Great Burstead and Crays Hill is clearly very important and the development of this site will compromise a very important gap between settlements. The development of this site unquestionably comprises the green belt purpose of preventing neighbouring towns from merging into one another.

Purpose 3 - To assist in safeguarding the countryside from encroachment

The Green Belt review states that "The majority of the Borough's Green Belt areas partly contribute to assisting in safeguarding the countryside from encroachment. The assessments found that many areas contain some development, such as residential development, or infrastructure such as overhead power lines and major roads, which detract from the openness of the countryside and would be classed as encroachment. However, parts of these areas still consist of agricultural land, fields, woodland, open space and/or marshland which are valued countryside and should be safeguarded.

Paragraph 6.14 states that "Areas that were reported as contributing to this purpose, may have contained farmsteads and other associated buildings which are compatible with a countryside setting, but they didn't contain development or infrastructure that detracted from the openness of the countryside. As shown in Figure 10 they were predominantly located towards the west and northwest of the Borough around Billericay".

The review has advised that the site partly compromises this purpose and would unquestionably provide development on a greenfield site which clearly has an open countryside character. Despite the site promoters contending that the site has the appearance of a brownfield site this is clearly not the case with the majority of the site being greenfield and having the appearance of open countryside. The development of this site will also result in pressure for the land to the west being allocated for development resulting in Purposes 2 and 3 of including land in the Green Belt being further compromised.

Purpose 4 To preserve the setting and special character of historic towns

Whilst the larger area 25 is considered to impact upon the character and setting of the Great Burstead Conservation Area, it is considered that this site is sufficiently distance from this area to negate it having an impact.

Conclusion

In view of the above it is considered that the proposal will result in an unacceptable sprawl into the open countryside to the south of Billericay and lead to the coalescence of settlements. There are also technical issues such as the provision of a suitable access and flooding which need to be fully assessed. The site will only provide a limited number of dwellings and the benefits arising from this site are not sufficient to override the unquestionable harm which will result to the Greenbelt

YOUR CONSULTATION RESPONSE

Please complete a separate copy of page 2 only for each site on which you are making a representation.

7. Please insert the site name and number, as found on the consultation documents to which this representation refers:

New Site 5 London Road, Billericay

8. Please indicate the nature of your representation in relation to this site:

Object

Support

Technical Comment

6. Please provide details of your representation below (continue onto a separate sheet as necessary).

INTRODUCTION

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Many of the comments that were made in previous representations are still applicable to this latest consultation on the housing section of the Council's draft Local Plan, particularly:

- The importance of maintaining the 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,
- Specific comments on several of the proposed housing areas (several of which are now proposed for expansion as a result of this current consultation).

Our previous and current objections are still based on the detrimental impact that the existing proposed housing site allocations will 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). The adverse impacts on the Green Belt and landscape will unquestionably be exacerbated if any of the additional sites currently being consulted on are allocated in addition to those already identified.

These objections also discuss the likely impact of the proposed housing site allocation and these additional sites on the town's infrastructure, which is already inadequate in a number of key service areas.

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Whilst it is noted there is significant commentary being made as to the actual housing needs of the Borough it is the task of the Inspector via the examination of the plan to confirm the actual numbers and the locations to which development should be directed. It must also be noted that the Borough has significant constraints, particularly with regards to Green Belt, and it may actually prove difficult to accommodate the scale of development envisaged. This is particularly the case with Billericay which is surrounded by unspoilt open countryside and comprises an attractive landscape which is particularly sensitive to change.

It is noted that Policy SD1 of the emerging Local Plan states that *"In order to accommodate the remainder of the growth, the Green Belt has been reviewed to make provision for around 8,000 to 8,500 new homes and 11 to 14 ha of employment land. The review has ensured that the purpose of the wider Green Belt is maintained, and that those parts of the Green Belt of higher landscape and/or ecological value are protected, and enhanced where possible, in accordance with the NPPF. A sequential approach to flood risk has also been taken, and those areas at greatest risk of flooding will be avoided"*. The requirements of Policy SD1 need to be applied to the current consultation.

An initial analysis of the sites by either the Borough Council or the County Council to understand their views as to the appropriateness of the sites would have been beneficial and allowed objectors to be aware of technical constraints, such as highway capacity. This would have answered some of the questions about the sites being consulted upon and given a greater steer as to the suitability of each site for development.

It is considered that the importance of protecting the wider Green Belt as well as areas of higher landscape and ecological value should be a major consideration in the identification of sites and should take precedence over the need for housing.

It is also worth noting that the majority of sites being promoted via this consultation are adjoining Billericay. This is an example of the desirability of Billericay as a preferred location for development as opposed to other towns within the Borough.

Whilst, there is considerable comment as to the provision of a western relief road it is clear that the landscape impacts of providing this route need to be considered and is the provision of a substandard route really the most appropriate way to address traffic problems. As part of this consideration is the capacity of the highway network a justification for further limiting development, especially if development is unwilling or unable to fund the costs of the undoubted highway upgrades which will need to facilitate even a modest scale of additional housing.

Finally, in considering the sites proposed in Billericay, the Council must have regard to the unquestionable adverse impacts that development will have not only on the attractive landscape but also the Green Belt. These should not be sacrificed without a proper and full consideration of the impacts of development.

Whilst this site is located to the west of the site proposed for allocation via emerging Policy H21, it clearly represents an uncontrolled expansion of the site into the open countryside. Unlike site H21 which borders the land on the northern side of London Road, this site represents an open countryside location which will reinforce the ribbon development along London Road and will not round off or consolidate an existing built up area.

The Addendum to the Green Belt Review 2015: Site Allocation Appraisals for the Basildon Borough Draft Local Plan December 2015 has assessed site H21. This review has considered four purposes for including land in the green belt. These four purposes are

Purpose 1 To check unrestricted sprawl of large built-up areas

Purpose 2 To prevent neighbouring towns from merging into one another

Purpose 3 - To assist in safeguarding the countryside from encroachment

Purpose 4 To preserve the setting and special character of historic towns

Purpose 1 To check unrestricted sprawl of large built-up areas

It is stated that this site partially contributes to this green belt function in that a *"New rural/urban boundary would be defined by natural field and hedgerow boundaries. There would still be some instances of urban sprawl therefore there would be no change to the scoring"*.

However, this proposed site will clearly result in significant urban sprawl extending the built development on the western edge of Billericay from 339m to 799m a distance of 466m and this proposal will clearly be in conflict with the objective of checking urban sprawl.

Purpose 2 To prevent neighbouring towns from merging into one another

This proposal would result in a significant reduction in the gap between Billericay and Brentwood. The proposed allocation H21 would already erode this gap and the remaining Green Belt land, will need to remain and be safeguarded to fulfill the purpose in preventing these towns from merging.

Purpose 3: To assist in safeguarding the countryside from encroachment

This proposal would clearly result in significant encroachment to the countryside, in excess of 466m from the area proposed for allocation H21. Unlike the land to the east this site is particularly prominent from long distance views without the more substantial landscaping which subdivides the different parcels of land which form proposed allocation H21. The Basildon Outline Landscape Appraisals of Potential Strategic Development Sites states that the *"Western side of site is more open to view than the eastern fields from local roads and public rights of way"*. This emphasises the encroachment and impact that this site will have into and upon the open countryside.

This appraisal also states that *"The characteristics identified for Area 9B relating to site sensitivity extend across most of Site 29 other than the western side which is considered to be of higher sensitivity. This area is more open to public view from London Road and the public footpath to the west. It is also less connected to the urban edge of Billericay and extends towards built development associated with Havering's Grove"*. This again represents the countryside character of this site.

The Basildon Outline appraisal of potential strategic developments sites in relation to Site 29 (Proposed allocation H21) states that in relation to the Key landscape areas to be protected/retained that *"The western side of the site including the Billericay Cricket Club, plant nursery and residential property with large grounds at Greenleas Farm should be retained. This area has greater visibility from London Road on the approach to Billericay and the public footpath route across open agricultural land to the west. The character of this area is more closely associated with the open arable landscape to the west and north than the urban edge of Billericay to the east"*.

The extent of development proposed is not required to provide the northern entrance to the relief road to Billericay and pushing a relief road further from the western boundary of the town will result in greater pressure to infill this area. As can be seen from the proposals map the bypass could be positioned on the western edge of the proposed allocation without the need to provide another large expanse of housing. It should also be mentioned that due to the substantial costs associated with this road that the proposed road will be a distributor road rather than a purpose built relief road.

In addition, to the highway impacts associated with this site, information has been provided by local residents that the site is susceptible to flooding due to its low situation with a tributary of the River Wid along its eastern boundary. The issue of flooding needs to be fully considered as part of the appraisal of this site.

The site promoters state that this proposal will provide benefits in the provision of a care home and a children's day nursery. However, these are both commercial operations which will not result in benefits to the wider population.

Conclusion

As detailed this site will represent an unacceptable encroachment into the open countryside which has no connection with the existing urban edge. It will also significantly erode the gap between Billericay and Brentwood which is a key purpose of including land in the Green Belt. The site is clearly unacceptable in landscape terms and will not result in any realistic benefits to Billericay.

YOUR CONSULTATION RESPONSE

Please complete a separate copy of page 2 only for each site on which you are making a representation.

9. Please insert the site name and number, as found on the consultation documents to which this representation refers:

Alternative Site 4 – Land at Outwood Farm, Billericay

10. Please indicate the nature of your representation in relation to this site:

Object

Support

Technical Comment

7. Please provide details of your representation below (continue onto a separate sheet as necessary).

INTRODUCTION

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Many of the comments that were made in previous representations are still applicable to this latest consultation on the housing section of the Council's draft Local Plan, particularly:

- The importance of maintaining the 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,
- Specific comments on several of the proposed housing areas (several of which are now proposed for expansion as a result of this current consultation).

Our previous and current objections are still based on the detrimental impact that the existing proposed housing site allocations will 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). The adverse impacts on the Green Belt and landscape will unquestionably be exacerbated if any of the additional sites currently being consulted on are allocated in addition to those already identified.

These objections also discuss the likely impact of the proposed housing site allocation and these additional sites on the town's infrastructure, which is already inadequate in a number of key service areas.

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It is noted that Policy SD1 of the emerging Local Plan states that *"In order to accommodate the remainder of the growth, the Green Belt has been reviewed to make provision for around 8,000 to 8,500 new homes and 11 to 14 ha of employment land. The review has ensured that the purpose of the wider Green Belt is maintained, and that those parts of the Green Belt of higher landscape and/or ecological value are protected, and enhanced where possible, in accordance with the NPPF. A sequential approach to flood risk has also been taken, and those areas at greatest risk of flooding will be avoided"*. The requirements of Policy SD1 need to be applied to the current consultation.

An initial analysis of the sites by either the Borough Council or the County Council to understand their views as to the appropriateness of the sites would have been beneficial and allowed objectors to be aware of technical constraints, such as highway capacity. This would have answered some of the questions about the sites being consulted upon and given a greater steer as to the suitability of each site for development.

It is considered that the importance of protecting the wider Green Belt as well as areas of higher landscape and ecological value should be a major consideration in the identification of sites and should take precedence over the need for housing.

It is also worth noting that the majority of sites being promoted via this consultation are adjoining Billericay. This is an example of the desirability of Billericay as a preferred location for development as opposed to other towns within the Borough.

Whilst, there is considerable comment as to the provision of a western relief road it is clear that the landscape impacts of providing this route need to be considered and is the provision of a substandard route really the most appropriate way to address traffic problems. As part of this consideration is the capacity of the highway network a justification for further limiting development, especially if development is unwilling or unable to fund the costs of the undoubted highway upgrades which will need to facilitate even a modest scale of additional housing.

Finally, in considering the sites proposed in Billericay, the Council must have regard to the unquestionable adverse impacts that development will have not only on the attractive landscape but also the Green Belt. These should not be sacrificed without a proper and full consideration of the impacts of development.

Alternative Site 4 - Land at Outwood Farm, Billericay

It is already contended that the proposed allocation site H26a represents a significant incursion into the open countryside to the east of Billericay. The allocation of this site will unquestionably result in even greater harm. The report submitted to support the allocation of this site is incorrect with the north western half of the site being bordered by existing residential development and the eastern and southern half of the site bordering open countryside. As with the assessment of New Site 1 the development of this site will have a detrimental impact on both the wildlife corridor from Mill Meadows an SSSI and LNR and the important views from the open countryside westwards into Billericay.

The Addendum to the Green Belt Review 2015: Site Allocation Appraisals for the Basildon Borough Draft Local Plan in reviewing the proposed allocation H26 also identifies the important Green Belt purposes this alternative site fulfils. It states that the "New rural/urban boundary would be defined by natural field boundaries. There are no instances of urban sprawl which occur in the previous Green Belt sub area [i.e. Alternative Site 4] and the revised Green Belt sub-area would still contribute to purpose.

The allocation of this land would further enclose the cone of land which lies to the east of Billericay, comprising Mill Meadows, narrowing the linkages from this site to the open countryside. This is an important issue arising from the sites designation as both a SSSI and a LNR. The allocation of this site in conjunction with other sites on the east of Billericay will also harm the ecological and amenity value of this area from increased public use. It is also important to note that the land to the south of the site is considered to represent the highest value of Green Belt and should not be adversely impacted on its fringes by sprawling development which is unrelated to the existing built form of Billericay. This is reinforced by the Basildon Outline Landscape Appraisals of Potential Strategic Development Sites which states that the most elevated and prominent ground is to the north-east.

The Basildon Outline Landscape Appraisals of Potential Strategic Development Sites also states that the "*The areas of highest sensitivity comprise the higher land on the north side of the site and the areas adjacent to Outwood Farm Road. The area to the north, although directly associated with the adjacent residential areas, is widely open to views from private properties and the surrounding landscape. The elevated nature of the landform makes it more prominent in the wider landscape and the land is elevated above existing areas of residential development that are already relatively exposed on the urban edge. Other lower areas of land, around the perimeter of the site adjacent to Outwood Farm Road are also sensitive due to the importance of this area in forming part of a wedge of green land which extends into Billericay between Sunnymede and South Green*".

It is clear that the landscape impacts are significant, regardless of the green belt designation of the site, which are sufficient alone to justify the rejection of this site. It is noted that this site has already been rejected by the Council and there are no significant changes or benefits arising from the site which would now justify its allocation.

The site is looking to enclose an area of woodland on the north western side of the site and no information has been provided as to the ecological impacts of development on this woodland and the wider area. This is an important consideration due to its close proximity of the LNR and SSSI.

Whilst there are some questions as to the actual value of the relief road which is being used as justification by the Council to support development on the western side of Billericay this proposal does not propose any highways mitigation and will result in increased traffic on Outwood Common Road to the south of the site, which is particularly difficult to upgrade without the loss of significant trees. If the Inspector also accepted the accepted the allocation of New site 1 this would exacerbate the highway situation to an unacceptable level. Due to the lack of actual evidence provided by the Borough Council or Essex County Council it is impossible at this stage to know the local highway authority's views on the acceptability of this scale of development on the local highway network.

The site is located only 300m from a waste water treatment works which will undoubtedly need to be upgraded as part of the Billericay development proposals. The provision of development in this location is likely to result in smell nuisance complaints and raises a further question as to the suitability of this site.

The proposed allocation is looking to provide the bare minimum of community benefits with financial contributions being offered to enhance existing schools. These schools are within 800m of the site and there are questions as to whether these can actually be expanded and whether children will actually walk to them. The scale of development being proposed is likely to result in new schools needing to be provided which are expected to be a greater distance from the site than those already existing. Again the paucity of evidence from Essex County Council regarding the provision of schools, particularly primary education provision is not helpful. The distance of this site from the existing facilities in Billericay is considerable and alternatives to the private car are not really a viable proposition.

The comments made regarding affordable housing and viability are interesting and raise the question as to whether this proposal will actually provide 25% affordable housing. This is an important issue as Green Belt land should only be released in exceptional circumstances and the benefits that this proposal will bring to Billericay when compared with the adverse impacts are questionable.

Conclusion

The Basildon Outline Landscape Appraisals of Potential Strategic Development Sites provides a very good summary as to why this site should continue to be rejected in that it advised that *"No part of Site 11 [Alternative Site 4] is considered to have the potential to be developed without causing significant adverse landscape and visual effects on the East Billericay Wooded Hills and Ridges LCA. Development in Site 11 would erode the strong rural character of Outwood Farm Road and affect the integrity of the important green wedge. Development in the north of the site, despite its good connections with the existing development edge, would be elevated above the existing housing and be prominent in views back to the town from the wider landscape to the south. Development in the south of the site would result in the incursion of a sensitive and high quality rural landscape and would weaken the strategic green wedge. It would also not link in with existing settlement patterns due to the block of woodland which contains the existing settlement edge and forms a barrier between this and the site"* Allied to the above the significant constraints associated with the site confirms its unsuitability for development.

YOUR CONSULTATION RESPONSE

Please complete a separate copy of page 2 only for each site on which you are making a representation.

11. Please insert the site name and number, as found on the consultation documents to which this representation refers:

Alternative Site 9 – Land east of Frithwood Lane, Billericay

12. Please indicate the nature of your representation in relation to this site:

Object

Support

Technical Comment

8. Please provide details of your representation below (continue onto a separate sheet as necessary).

INTRODUCTION

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An initial analysis of the sites by either the Borough Council or the County Council to understand their views as to the appropriateness of the sites would have been beneficial and allowed objectors to be aware of technical constraints, such as highway capacity. This would have answered some of the questions about the sites being consulted upon and given a greater steer as to the suitability of each site for development.

It is considered that the importance of protecting the wider Green Belt as well as areas of higher landscape and ecological value should be a major consideration in the identification of sites and should take precedence over the need for housing.

It is also worth noting that the majority of sites being promoted via this consultation are adjoining Billericay. This is an example of the desirability of Billericay as a preferred location for development as opposed to other towns within the Borough.

Whilst, there is considerable comment as to the provision of a western relief road it is clear that the landscape impacts of providing this route need to be considered and is the provision of a substandard route really the most appropriate way to address traffic problems. As part of this consideration is the capacity of the highway network a justification for further limiting development, especially if development is unwilling or unable to fund the costs of the undoubted highway upgrades which will need to facilitate even a modest scale of additional housing.

Finally, in considering the sites proposed in Billericay, the Council must have regard to the unquestionable adverse impacts that development will have not only on the attractive landscape but also the Green Belt. These should not be sacrificed without a proper and full consideration of the impacts of development.

Alternative Site 9 – Land east of Frithwood Lane.

The Addendum to the Green Belt Review 2015: Site Allocation Appraisals for the Basildon Borough Draft Local Plan in relation to H23 is relevant in that this smaller site is considered to be leading to urban sprawl. The significant increase in the site area would unquestionably exacerbate the sprawl to the south west of Billericay. The assessment of the site in The Addendum to the Green Belt Review 2015: Site Allocation Appraisals for the Basildon Borough Draft Local Plan states that the *“New rural/urban boundary would be defined by natural field and wooded boundaries. The instances of urban sprawl which occur in the previous Green Belt sub-area would remain. Purpose 3: Partially contributes – no change. There are some existing dwellings which would remain in the new sub-area the area which would be classed as encroachment, as such this sub-area scoring would remain the same”*

In reviewing the surrounding road network it appears that there are access constraints associated with proposed allocation H23 which have made it necessary to achieve a more suitable access from Laindon Road. Such an access does not appear to be available at the present time with site H23 being served from the more constrained local network.

The commentary pertaining to the emerging local plan is important and the resident groups acknowledge and support the comments made at option 2 of the emerging plan which has rejected the allocation of a larger site. Option 2 relates to developing a larger area with 800-1,000 homes. It is advised that *“Whilst the HELAA indicates that more land in this location is identified as suitable and available for housing supply for around 800-1,000 homes together with community facilities and open space.....the Outline Landscape Appraisal identifies that not all the land identified in the HELAA should be developed due to the significant impact it would have on the surrounding landscape, together with impacts on the Green Belt which currently help prevent the historic village of Little Burstead from merging with the urban edge of south Billericay”* This commentary clearly demonstrates the unsuitability of this site.

The proposed allocation will result in development bordering Frith Wood on three sides with a highly managed landscape in the form of a golf course comprising the western boundary. This woodland is a very important resource of ancient and semi natural woodland and is also designated as a Local Wildlife site. The proposed measures to provide a 15m buffer will clearly not override the harm which will be caused to both the woodland and its associated habitat from development. The site will also result in a significant increase in the visitor pressure on Laindon Common, which is also a Local Wildlife site.

The Basildon Outline Landscape Appraisal of Potential Strategic development site has analysed the entirety of Alternative site 9. This appraisal advises that the proposed allocation of H23 would be in an area of lower landscape sensitivity whilst the proposed larger area would be in an area of moderate landscape sensitivity

This appraisal provides a good summary of the landscape constraints associated with the site in advising that *“Frith Wood, an actively managed Ancient Woodland adjacent to this area is a sensitive feature of the site and the area immediately around is therefore considered to be of higher sensitivity. The north eastern corner of the site is also of higher sensitivity on account of its elevated position and increased visibility in the landscape. The linear fields to the south-west are also considered to be sensitive due to their disconnection from the existing urban edge of Billericay. Development of this area would compromise the separation between Billericay and Little Burstead”*

This landscape appraisal states that Key landscape areas to be protected/retained comprise *“The elevated landscape to the north-east corner of the site should be retained as agricultural landscape with existing occasional dwellings. This area is widely visible from the public footpath route and provides long distance views across the countryside to the south-west. The linear fields to the south of Frith Wood and north of Laindon Common should also be retained as open farmland. Development of this area would significantly compromise separation between Little Burstead and Billericay and would be uncharacteristic to this part of the West Billericay Wooded Farmlands.*

Frith Wood Ancient Woodland should be retained for its landscape and ecological value and the visual containment it provides to part of the Billericay settlement fringe. Any proposed development would need to be sufficiently offset from this area so as not to cause any disturbance to the value of the woodland"

Conclusion

The proposition that this site could help to achieve a relief road to Billericay is not sufficient to justify the adverse ecological impacts the site will have as well as the proposal being contrary to the purposes of including land in the Green Belt resulting in the sprawl of the site into the open countryside and the coalescence of Billericay with Little Burstead.

YOUR CONSULTATION RESPONSE

Please complete a separate copy of page 2 only for each site on which you are making a representation.

13. Please insert the site name and number, as found on the consultation documents to which this representation refers:

Alternative Site 10 – Land south of Windmill Heights, Great Burstead

14. Please indicate the nature of your representation in relation to this site:

Object

Support

Technical Comment

9. Please provide details of your representation below (continue onto a separate sheet as necessary).

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Whilst it is noted there is significant commentary being made as to the actual housing needs of the Borough it is the task of the Inspector via the examination of the plan to confirm the actual numbers and the locations to which development should be directed. It must also be noted that the Borough has significant constraints, particularly with regards to Green Belt, and it may actually prove difficult to accommodate the scale of development envisaged. This is particularly the case with Billericay which is surrounded by unspoilt open countryside and comprises an attractive landscape which is particularly sensitive to change.

It is noted that Policy SD1 of the emerging Local Plan states that *"In order to accommodate the remainder of the growth, the Green Belt has been reviewed to make provision for around 8,000 to 8,500 new homes and 11 to 14 ha of employment land. The review has ensured that the purpose of the wider Green Belt is maintained, and that those parts of the Green Belt of higher landscape and/or ecological value are protected, and enhanced where possible, in accordance with the NPPF. A sequential approach to flood risk has also been taken, and those areas at greatest risk of flooding will be avoided"*. The requirements of Policy SD1 need to be applied to the current consultation.

An initial analysis of the sites by either the Borough Council or the County Council to understand their views as to the appropriateness of the sites would have been beneficial and allowed objectors to be aware of technical constraints, such as highway capacity. This would have answered some of the questions about the sites being consulted upon and given a greater steer as to the suitability of each site for development.

It is considered that the importance of protecting the wider Green Belt as well as areas of higher landscape and ecological value should be a major consideration in the identification of sites and should take precedence over the need for housing.

It is also worth noting that the majority of sites being promoted via this consultation are adjoining Billericay. This is an example of the desirability of Billericay as a preferred location for development as opposed to other towns within the Borough.

Whilst, there is considerable comment as to the provision of a western relief road it is clear that the landscape impacts of providing this route need to be considered and is the provision of a substandard route really the most appropriate way to address traffic problems. As part of this consideration is the capacity of the highway network a justification for further limiting development, especially if development is unwilling or unable to fund the costs of the undoubted highway upgrades which will need to facilitate even a modest scale of additional housing.

Finally, in considering the sites proposed in Billericay, the Council must have regard to the unquestionable adverse impacts that development will have not only on the attractive landscape but also the Green Belt. These should not be sacrificed without a proper and full consideration of the impacts of development.

Alternative Site 10 - Land south of Windmill Heights, Great Burstead

This site forms an extension to the site proposed for allocation under policy H24 of the emerging Local Plan. This larger site has already been assessed and rejected and it is questionable as to why the Council is reopening the debate as to the merits of this site when it has already been considered.

The site has been assessed by Addendum to the Green Belt Review 2015: Site Allocation Appraisals for the Basildon Borough Draft Local Plan against the following criteria to determine the purposes this site performs in relation to the Green Belt. The criteria considered are as follows.

Purpose 1 To check the unrestricted sprawl of large built-up areas;

Purpose 2 To prevent neighbouring towns merging into one another;

Purpose 3 To assist in safeguarding the countryside from encroachment;

Purpose 4 To preserve the setting and special character of historic towns;

Purpose 1 To check the unrestricted sprawl of large built-up areas

The contribution that this site makes to the purposes of including the land in the green belt has changed from partially contributes to contributes as it would allow a well-defined edge to the urban area to be created. It is contended that the proposed extension will harm this purpose as it will represent the incursion into the open countryside which will not relate to the existing built form.

Purpose 2 To prevent neighbouring towns merging into one another

This alternative site unlike the earlier smaller site will bring development further south of Billericay partially contributing to the merger of Great Burstead with nearby settlements.

Purpose 3 To assist in safeguarding the countryside from encroachment

The purpose that this site makes to the purposes of including the land in the green belt has changed from contributes to partially contributes. It is stated that this area [Site H24] would provide a rural break to the nearby settlements and the adjacent residents with links into the countryside. The development of this site would compromise this objective by encroaching into the countryside to the south.

The green belt study has concluded that as a result of the larger area, which the alternative site forms part of, being rejected the new sub-area [Site H24] now scores green instead of amber which is an improvement to the Green Belt and its purposes in this area. The findings of this review clearly indicate that this alternative site should not be developed.

The resident groups support the Council's conclusion within the emerging Local Plan in relation to an alternative option for policy H24. Option 2 gives consideration to developing at 20 dwellings per hectare for circa 45 homes. This option advises that *"Whilst the HELAA indicates that more land in this location is identified as suitable and available for housing supply, the plan could consider that the site is on the edge of Great Burstead and South Green Village (part of the Billericay urban area) and choose to lower the density and accommodate less homes, including some which take up more land including executive or bungalows, which are also part of the Borough's qualitative housing need. The Outline Landscape Appraisal identifies that not all the land identified in the HELAA should be developed in any case, which is why H24 seeks to limit this by only releasing land to the far north due to the significant impact it would otherwise have on the surrounding landscape to otherwise develop more intensely in this location. This aside, the surrounding urban form and densities are higher and to lower the density would result in a less efficient use of a greenfield site, considering its location close to the town centre"*

This Alternative Site was considered as a larger site in the Basildon Outline Landscape Appraisals of Potential Strategic Development sites. This appraisal has considered that the land aside from the proposed site H24 is of higher landscape sensitivity. This report provides a useful summary as to why this alternative site should be rejected and the key landscape areas which should be protected/retained. It is advised that *"The large proportion*

of the site should be retained as an attractive strip of open agricultural landscape providing a green break between Tye Common, Noak Hill, Little Burstead, Great Burstead and South Green. Parts of the site are widely visible from the surrounding landscape and there are attractive long distance views provided by local public rights of way. The site has a largely rural character and large scale development would be inappropriate in this location, causing significant adverse landscape and visual effects on the West Billericay Wooded Farmlands LCA. Development of the wider extent of the site would also compromise separation between Great Burstead and South Green and neighbouring settlements".

This report considers that the smaller site will allow opportunities for landscape mitigation by way of the creation of a new woodland belt. The proposition to extend this site will clearly reduce the potential to provide landscape mitigation increasing the visual prominence of development in this location.

Conclusion

It is apparent that this site has already been considered by both the Green Belt Review and the landscape appraisals and rejected. The information submitted in relation to this site does not propose any new measures to overcome the original objections and it is maintained that this site should not be considered due to the demonstrable harm it will cause to the southern edge of Great Burstead.