

BILLERICAY TOWN COUNCIL
BASILDON LOCAL PLAN REGULATION 19 CONSULTATION RESPONSE

REPRESENTATION 1

1. Appendix – *Basildon Borough Local Plan – Infrastructure Delivery Plan (IDP) 2018*

2. THESE COMMENTS RELATE TO THE TEST OF SOUNDNESS

2a. NOT JUSTIFIED

3. Please see explanation below.

Policy context 2.1.1 (Page 5) – The ability to meet forecast demands for the capacity of the Railway cannot be met as this is unknown.

Policy context 2.1.4 (page 5) – The IDP is lacking in detail as to how the costs of health provision will be met and is using standard cost estimates which the NHS has warned against using. Only a small proportion of expected funding has been promised by the County Council for education and this is supposed to cover the whole Borough of Basildon which leaves a huge funding gap for new schools.

Health & Social Care 12.1.6 (Page 14) – how can the statement 12.1.6 be met if there is no forecast of demand for wider primary care services.

Health & Social Care 12.1.19 (Page 15) – There is no information on agreement of or on the implementation timescale of the reconfiguration of hospital services which may not then be in place by the time of development.

Health & Social Care Infrastructure Costs (Page 18) 12.1.51 – this states that contributions may be sought from the developer but how will the cost be funded if not by developer? The SW of Billericay requires a new larger GP practice to meet the increase in population but this is only one of many new GP surgeries that will be required across the Borough as a whole.

Health & Social Care Infrastructure Costs (Page 19) 6.2.7 – How can the cost estimates for health & social care infrastructure costs be taken seriously if the document is using cost estimates that the NHS itself has warned against the use of.

Health & Social Care Funding Sources (Page 19) 6.3.2 – SW Billericay requires funding for a new 4-5 GP practice. Considering the other new GP surgeries that are required across the Borough and all the wider primary care services that are needed how confident can we be that funding streams will be available considering the CCG are not able to provide this information.

Education Funding Sources (Page 23) 7.3.1 – Any significant housing development will require the provision of additional school places either through expansion or establishment of new schools. The main funding stream for education capacity to accommodate housing growth is developer contributions (S106/CIL). Although the Education Authority receives 'Basic Need' grant this should not be relied upon to meet demand generated by Local Plans. As yet no known sources of funding have yet been secured. As there is approximately a £50 million funding gap in education forecast by Essex County Council for Basildon. As there will be a great demand from other infrastructure projects on the CIL levy it is not clear how or if this funding gap will be covered.

Traffic/Highways (Page 25) 8.1.10 – The document states that sustainable modes of transport can be used to mitigate the effect of an increase in road traffic on junctions that are at or over capacity. However there is no detail about what these schemes might be and no modelling data to show that they would work.

Traffic/Highways Infrastructure Costs (Page 27) 8.2.1 – There is approximately a 90 million funding gap identified by Essex County Council for local roads. The cost of the proposed relief road for SW Billericay does not take into account any costs associated with land acquisition or associated compensation therefore the figure estimated for the new road is inaccurate. There is no detail as to how this gap will be covered. The IDP does not cover any localised road work improvements. This could mean that these works will not be carried out due to lack of funding or will not be completed until well after all the developments are built.

Traffic/Highways Infrastructure Costs (Page 28) 8.3.5 – Well over 50% of aggregate cost estimates have no funding. The document lacks detail on how much of this will be covered by the CIL. There is no guarantee that extra funding will come from LEP or any other Government funding initiatives.

Public Transport (page 30) 9.1.17 – Greater Anglia have confirmed that Billericay will have 10 car units during peak times and that the majority of trains on order are 5 car units which means that trains are likely to be made up of two five car units which have slightly less capacity. Greater Anglia cannot provide data on standing capacity. There is no planned upgrade for Billericay station so it is doubtful if both the station would cope with the increase in traffic for extra commuters being dropped off and picked up or if the trains will cope with a substantial increase in commuters.

Public Transport Funding Sources (Page 30) 9.3.3 – Greater Anglia cannot provide information regarding the future capacity required as they do not know the numbers of houses in developments planned for areas along the entire network and any associated feeder lines. There are major infrastructure constraints on the Liverpool Street line. It is impossible to increase the number of platforms at the Liverpool Street terminus which restricts the number of trains the station can handle.

A number of other railway lines also share the rail system and converge into Liverpool Street.

4. These are the modification(s) Billericay Town Council considers necessary to make the Revised Publication Local Plan legally compliant and/or sound.

The modifications required would be for the Infrastructure and Delivery Plan document to contain more detailed evidence as some assumptions and projections are not based on sound data. Sound detail is lacking in the following areas:

Funding – the document lacks in detail as to how some of the huge funding gaps will be met especially for Health, Education and Highways. There is no indication on how the CIL will be divided between the many infrastructure needs. There is no evidence of alternative funding streams that might be available. The document is using out of date cost estimates (NHS). Some costs have been completely missed out of the document (land acquisitions/compensation).

Modelling data – there has been no modelling to show if traffic congestion could be mitigated by sustainable transport methods. There is no modelling to show if the railway station could cope with a significant increase in commuters. The ability of the railway network to cope has also not been modelling and does not take into account the infrastructure developments needed along the railway line to accommodate more trains. There is no data to show that the increase in capacity of new trains will cover demand.

5. Yes we wish to participate at the oral examination.

6. Outline of why we consider this necessary:

The Town Council feels that if it attends the oral examination it will be able to make sure that its suggested modifications are explained clearly, concisely and logically in the presence of both the Planning Inspector and Planners ensuring a positive outcome is reached.

REPRESENTATION 2

1. Policy Number E2 and E3 - Figure Number 7.22

2. THESE COMMENTS RELATE TO THE TEST OF SOUNDNESS

2a. NOT JUSTIFIED

3. Please see explanation below. This statement below should be reviewed to make sure that it is based on sound data and not conflicting information.

The Revised Local Plan 2014-2034 Policy E2 and E3 7.22 (h) Page 38/39 - concludes that "*the Radford Way employment area be expanded to include the surface car park on Radford Crescent*" - this means potentially the loss of one of the main car parks in Billericay. The justification for this was based upon a review conducted within the Employment Land and Premises Study July 2013 Page 102 8.44 (Table 33) which concluded that Radford Crescent car park is "vacant/under-utilised" land and in the same document page 62 6.106 "*Opportunity No. 2 is a surface car park on Radford Crescent and presents an opportunity for development for potential B-class uses; if a business case could be put forward, the Council as landowner could determine to release this for employment development*".

Separately, however, another Local Plan document - the "Basildon Parking Capacity and Intervention Study" May 2017 analyses in detail current and projected car park utilisation. This concludes that the Radford Crescent car park is both well used and its usage will increase further during the course of the Local Plan.

It includes the following observations:

- 5.19 page 86 "Radford Crescent long stay car park was well used throughout the day with over 75% occupancy"
- 5.15 page 86 "Parking demand is high across all of the main car parks within Billericay throughout the week, with the Station Car Park being the most heavily occupied car park. This is operating consistently near capacity throughout the day due to the volume of commuter parking"
- 5.18 page 86 "A high turnover of vehicles was also observed within the other short stay car park in Lake Meadows, This was observed to be a lot busier during the morning counts (at 95% occupied) compared to the afternoon counts at 78% occupied" This is relevant because development aspirations of Basildon Council for the swimming pool will see significant increase in the usage which is not taken into account in this plan.
- 6.12 page 93 (Table 6.2) shows current occupancy at Radford Crescent (75% to 85%) – with a future predicted peak occupancy of (85% to 95%) this clearly does not support the "vacant/underutilised" statement in the Employment Land and Premises Study which the current local plan is using as justification to expand the employment area in Radford Way.

4. These are the modification(s) Billericay Town Council considers necessary to make the Revised Publication Local Plan legally compliant and/or sound.

The Evidence Base in the Revised Local Plan 7.22 (h) uses data from the (*Employment Land and Premises Study*) to justify expanding the employment zone into the Radford Crescent car park due to under use which is then contradicted by another Council commissioned study (*Basildon Parking Capacity and Intervention Study*) which shows that the car park is well used with future occupancy at 95%. Therefore the conclusion reached in the Revised Local Plan 7.22 (h) page 38/39 is based on an older study undertaken in 2013 when information from a newer study undertaken in 2017 shows a differing result. This statement should be reviewed to make sure that it is based on sound data and not conflicting information.

5. Yes we wish to participate at the oral examination.

6. Outline of why we consider this necessary:

The Town Council feels that if it attends the oral examination it will be able to make sure that its suggested modifications are explained clearly, concisely and logically in the presence of both the Planning Inspector and Planners ensuring a positive outcome is reached.

REPRESENTATION 3

1. Policy Number – T2

2. THESE COMMENTS RELATE TO THE TEST OF SOUNDNESS

2a. JUSTIFIED and EFFECTIVE

3. Please see explanation below.

Policy T2 includes highways improvements for Billericay:

“1. g. The provision of a south/south-west relief route for Billericay alongside new housing development;

- 1. j. viii. A129/Mountnessing Road/London Road roundabout, Billericay*
- ix. B1007/A129 Sun Corner junction, Billericay*
- x. B1007/Norsey Road/High Street/Western Road, Billericay*
- xi. A129/Southend Road/Outwood Common Road, Billericay*
- xii. A129/Southend Road/Hickstars Lane, Billericay”*

Billericay is an historic town that has seen significant growth over time and outgrown its highways network, with very little physical space for it to be improved - including pinch points where the roads narrow to cross the railway at Mountnessing Road, Norsey Road, Jacksons Lane and Outwood Common Road. The Radford Way/Stock Road is particularly constrained by surrounding buildings.

Neither justified nor effective.

1. The evidence does not show that traffic flows will be improved across the whole town.

The Highways Impact Assessment Parts 1 and 2 modelling shows that despite the relief road and some junction improvements, several junctions in the town will exceed capacity. Mitigation for those junctions is reliant upon sustainable transport provision including delivery of a Cycling Action Plan (see point 2) and additional bus routes. Results from the modelling are summarised in tables A, B and C under point 8.

2. Over reliance on sustainable transport measures that are subject to feasibility studies and for which no evidence of usage rates has been provided.

Policy T3 (1) states that “

“In order to increase the proportion of residents accessing work, railway services, education facilities, other services and recreational opportunities by foot or by bicycle, the schemes and projects set out in the latest Essex Transport Strategy, Public Rights of Way Improvement Plan and Basildon Cycling Action Plan to improve footpaths, footways and cycling infrastructure as well as the safety of users will be delivered during the plan period.”

However, on pages 55 and 56 of the Action Plan, which can be found here; (<https://www.essexhighways.org/uploads/docs/Basildon%20CAP.pdf>), schemes are listed under the title of “*Potential Schemes - Subject to Feasibility Study.*”

3. Baseline Traffic Data

Baseline data for traffic modelling is taken from 2014 and is therefore out of date. Anecdotal evidence suggests that traffic has increased over that period of time.

4. Evidence base relies on journey to work data, not origin-destination.

Highways modelling uses journey to work data rather than origin-destination data to determine the flow of traffic around the town. That does not account for through traffic from outside of the Borough/Town and other trips made to access services and facilities either within the Town or Chelmsford, Thurrock, Brentwood, the A127, A12 and beyond.

5. Reassignment of traffic from the Town Centre to more residential areas.

Congestion and traffic is reassigned from largely non-residential areas (the High Street) to residential areas, i.e. Western Road and Mountnessing Road.

6. One way system at Norsey Road previously trialled and abandoned

The proposed one way system at Norsey Road was trialled in 2005 and abandoned due to the impact on surrounding roads: <https://www.echo-news.co.uk/news/5543558.billericay-one-waytraffic-trial-on-hold-for-winter/>

As a part of this scheme it is proposed to widen the road at the top of Western Road with the loss of part of the lay-by outside the parade of shops. These shops include a number of takeaways and the loss of parking here will result in customers pulling up along the roadside and on the pavement in this area - as is already the case.

7. Two way option at Laindon Road?

It is not clear whether the modelling included a two way option along the length of Laindon Road. This is mentioned in both highways impact assessments but not included in T2. If it was included in the modelling, then the modelling should be redone without it.

8. South West Billericay Relief Route.

i) Based on modelling data, it is questionable whether the harm caused to the Green Belt, valued landscapes and amenity of residents in South West Billericay is outweighed by the provision of a relief route that fails relieve congestion across the town at a cost of at least £16.7million.

ii) It is not acceptable to include a key piece of infrastructure in the Local Plan where there is no evidence to demonstrate its effectiveness, deliverability and viability. There is only an indicative design for the relief road in the High Level Development Framework for South West Billericay, on which residents have not been consulted. There is no modelling for traffic flows along the new relief road or any of the new junctions that it creates. The design of this road and traffic modelling should not be left until the planning application stage.

iii) The South-West Billericay relief route is a spine road linking four new development areas in SW Billericay. It will cost a minimum of £16.7million not including any land acquisition costs. As Developers are expected to contribute towards the significant cost of the road, the proposed allocation of housing in this area was increased from around 1000 homes to 1700 through the High Level Development Framework for SW Billericay (HLDF). The HLDF was produced by Consultants and whilst stakeholders, including developers were engaged in its creation, residents were not.

Whilst the previous proposed allocation respected the conclusions of the Landscape Capacity Appraisals, the HLDF acknowledges the significant landscape impacts increased allocations in this area would have but suggests that this can be overcome by landscaping and buffers. Allocations were extended into areas not recommended for development in both the Green Belt Studies 2015 and Landscape Appraisals.

The proposed route of the road has been, and continues to be a contentious issue with three possible routes at Frithwood, none of which is ideal. One developer's preference is to put the road through a corner of Ancient Woodland and along the back of the Burstead Golf Course.

This route would also cut through two public rights of way and a Priority Habitat Area at Wiggins Lane. The historic and rural character of the Lane at this point would be lost. The Wood has been proven to be Ancient as it has been documented since 1290AD. Ancient woodland is afforded significant protection through National Planning Guidance. It was the quick and decisive action of residents that saved the wood from this fate.

A second route south of Frith Wood was also found to be too damaging to trees and was rightly discounted.

The route specified as being the most appropriate in the plan has a significant impact on residents of Frithwood Lane who will no longer live along a quiet, narrow, country lane, but find themselves up close and personal with a busy main road. The road at this point would be substandard due to its restricted width. The indicative design shows that Tye Common Road would cease to be a through road.

It is suggested in plan documents that the relief route would not only relieve congestion at Sun Corner but also relieve congestion elsewhere in the Town through the reassignment of traffic.

iv) So how effectively does the relief route achieve this and will the benefits outweigh the significant impact on the Green Belt, landscape and residents in SW Billericay?

Highways modelling in '*Ringway Jacobs/Essex County Council, Transport and Highway Impact Assessments Part 1 (2017) and Part 2 (2018)*' was carried out in two parts. The first modelled the impact of the relief route, a roundabout at the junction of London Road/Mountnessing Road and possibly a two way system along the length of Laindon Road (although this is unclear). Part 2 modelled additional mitigation at some junctions but not all mitigation that had been modelled in part 1.

This is confusing. The results from parts 1 and 2 are shown in tables A (AM flows) and B (pm flows) below. The text indicates what mitigation was tested in each part: WRR = Western Relief Route; Part 2 = mitigation modelled in part two; R/bout = Roundabout.

A sensitivity test was then applied to model what might happen if traffic doesn't behave in the way predicted by the model and isn't fully reassigned along alternative routes. This is shown below in table C.

Colour Code	Definition
Green	The junction has spare capacity.
Yellow	The junction is at or nearing capacity.
Orange	Junction is operating over capacity but further improvements to sustainable access could mitigate impact.
Red	Junction is operating over capacity and could potentially require physical mitigation.

Table A: AM traffic flows

(Extracted from: Ringway Jacobs/Essex County Council, Transport and Highway Impact Assessments Part 1 (2017) and Part 2 (2018).)

Junction	2014 Base Assessment	2034 With Mitigation	2034 With Mitigation	Mitigation Proposed in Policy T2
	AM	AM Part 1	AM Part 2	
London Road/Tye Common Road/ Western Road		Part 2	No	None
Sun Street/London Road/High Street		WRR	Signals	Signals
Stock Road/Radford Way		Part 2	None	None
Western Road/High Street/Norsey Road		Part 2	One Way	One Way/Widening
Mountnessing Road/London Road		R/bout	None	R/bout
Mountnessing Road/Radford way/ Perry St.		None	None	Sustainable transport
Potash Road/Stock Road/Queens Park Avenue		Part 2	None	Sustainable transport
Chapel Street/Sun Street/Southend Road		WRR	None	None
Hickstars Lane/A129 Southend Road		No need	Signals	Signals
A129 Southend Road/A176		WRR	None	Sustainable transport
Outward Common Road/A129 Southend Road		Part 2	None	Signals
A176/Kennel Lane/Laindon Road		No need	None	None

Table B: PM traffic flows

(Extracted from: *Ringway Jacobs/Essex County Council, Transport and Highway Impact Assessments Part 1 (2017) and Part 2 (2018).*)

Junction	2014 Base Assessment	2034 With Mitigation	2034 With Mitigation	Mitigation Proposed in Policy T2
	PM	PM Part 1	PM Part 2	
Sun Street/London Road/High Street		WRR	Signals	Signals
A129 Southend Road/A176		WRR	WRR	Sustainable transport
Stock Road/Radford Way		Part 2	None	Sustainable transport
Mountnessing Road/London Road		R/bout	None	R/bout
Potash Road/Stock Road/Queens Park Avenue		Part 2	None	Sustainable transport
London Road/Tye Common Road/Western Road		Part 2	None	None
Mountnessing Road/Radford way/Perry St.		No need	None	Sustainable transport
Chapel Street/Sun Street/Southend Road		WRR	WRR	Sustainable transport
Western Road/High Street/Norsey Road		Part 2	One Way	One way/Widening
Hickstars Lane/A129 Southend Road		Part 2	Signals	Signals
Outward Common Road/A129 Southend Road		Part 2	None	Signals
A176/Kennel Lane/Laindon Road		None	None	None

Table C: AM and PM Traffic Flows with Sensitivity Test Applied.
 (Extracted from: *Ringway Jacobs/Essex County Council, Transport and Highway Impact Assessments Part 1 (2017) and Part 2 (2018).*)

Junction	AM 2034 with Mitigation Sensitivity Test	PM 2034 with Mitigation Sensitivity Test
London Road/Tye Common Road/Western Road	Red	Green
Sun Street/London Road/High Street	Yellow	Yellow
Stock Road/Radford Way	Yellow	Red
Western Road/High Street/Norsey Road	Green	Green
Mountnessing Road/London Road	Orange	Green
Mountnessing Road/Radford way/Perry St.	Yellow	Orange
Potash Road/Stock Road/Queens Park Avenue	Orange	Red
Chapel Street/Sun Street/Southend Road	Orange	Orange
Hickstars Lane/A129 Southend Road	Yellow	Green
A129 Southend Road/A176	Green	Red
Outward Common Road/A129 Southend Road	Orange	Green
Outward Common Road/A129 Southend Road	Green	Green

The modelling shows that whilst congestion is relieved at the Sun Corner Roundabout, it is at the expense of other junctions in the town - so mitigation does not improve traffic flows in the town as a whole. It also reassigns traffic from a largely non residential area -the high street - to residential areas. Sensitivity testing demonstrates that traffic flows in Billericay are sensitive and the impacts will be severe if traffic doesn't reassign as intended.

Based on this modelling data, it is questionable whether the harm caused to the Green Belt and valued landscapes in this area is outweighed by the provision of a relief route that fails relieve congestion across the town at a cost of at least £16.7million.

*References. Pell Frischman, 2017, High Level Development Framework for Southwest Billericay
 Ringway Jacobs/Essex County Council, Transport and Highway Impact Assessments Part 1 (2017) and Part 2 (2018).*

4. These are the modification(s) Billericay Town Council considers necessary to make the Revised Publication Local Plan legally compliant and/or sound.

- 1.Reconsider whether the harm to the Green Belt and landscape is outweighed by the benefits of the relief road. If traffic flows cannot be adequately mitigated, then housing allocations must be reduced accordingly.
- 2.Produce an integrated highways improvement package and masterplan for Billericay as a part of the local plan which includes sustainable transport measures.
- 3.The relief road must be designed and tested to ensure that it is deliverable and that congestion will not be caused at pinch points along its route. Residents should be consulted during the design phase - particularly those who will be most impacted in the Frith Wood Lane/Tye Common Road Area.
- 4.Extend the Basildon Cycle Action Plan to include cycle and bridle ways within the new development areas and identify the route of the segregated parts where the relief road narrows at policy area H17.
5. Undertake feasibility testing for potential cycle routes to determine their achievability and whether they would be sufficiently used to mitigate over capacity junctions. Demonstrate how these would effectively relieve congestion at over capacity junctions.
6. Review the one way proposal at Norsey Road and the loss of part of the lay-by at Western Road where the road would be widened.
7. Produce up to date traffic count data and identify origin-destination of traffic flows to determine how much traffic is local and how much is through traffic.
8. Clarify whether the modelling included the 2 way proposal for Laindon Road and adjust the modelling if necessary.

5. Yes we wish to participate at the oral examination.

6. Outline of why we consider this necessary:

The Town Council feels that if it attends the oral examination it will be able to make sure that its suggested modifications are explained clearly, concisely and logically in the presence of both the Planning Inspector and Planners ensuring a positive outcome is reached.

REPRESENTATION 4

1. Policy Number – H17

2. THESE COMMENTS RELATE TO THE TEST OF SOUNDNESS

2a. EFFECTIVE

3. Please see explanation below.

Policy H17 is not effective because:

- a. By using the terms expect, should and where possible instead of must and required, this policy does not guarantee the provision of open spaces and landscape buffers, the relief road, cycle routes, bridleways, footpaths and that any relocated provision will be replaced with equivalent or better facility provision. This is important as sites in this policy area have low landscape capacities for development; valued landscapes, trees and hedges; and ancient woodland.
- b. It also fails to specify details of key elements such as GP provision and how individual development areas will be required to contribute to shared infrastructure costs. This is important as there is a significant funding gap in the plan and infrastructure will have to be prioritised.
- c. It sets out requirements in paragraph 12 that may not be achievable/deliverable because mitigation is not adequate or has not been tested or costed. The relief road has not been shown to be deliverable and viable.

Additional concerns relating to paragraphs 3, 10, 11 and 12 are listed below:

Paragraph 3: To what extent were the tennis and cricket clubs consulted when considering the relocation of facilities, to understand what their requirements would be and ensure that they are deliverable.

Paragraph 4: A secondary access from H17a on Mountnessing Road will create a staggered junction with Bellevue and Station Roads. Egress from these roads is increasingly problematic due to poor sight lines and the volume of traffic along Mountnessing Road. The new junction is likely to exacerbate this. In addition, the indicative layout of the London Road access, shows the road cutting through the open space.

Paragraph 10 states: *“Additional GP services will be required to serve the residents of the allocation, either on-site with a new GP hub or through contributions to expand existing facilities in Billericay, as specified by the NHS.”*

As it is stated in paragraph 11.157:

‘owing to level of development planned for Billericay it is likely that a new GP hub will be required to serve residents of this allocation. Consultation with the NHS will be needed to establish whether on-site provision will be required and to identify a suitable location for it within the allocation.’

It would be reasonable to expect that the need for a GP Hub or otherwise would have been determined to enable sufficient land to accommodate a new GP Hub to be allocated within this policy and its delivery ensured. There is currently no GP provision within the policy area and GP services in the vicinity are constrained on their sites, so it is unlikely that they would be able to expand and also provide sufficient parking. Residents who are unwell are likely travel to the GP by car. There is no indication given in this policy as to how the GP services will be funded and whether development areas must contribute the full or partial cost.

Paragraph 11 states: *“All development areas will be expected to contribute towards the delivery of the new relief road including all associated junctions and the widening of Frithwood Lane. It is expected that a cycle way and bridleway will be required as part of the delivery of the relief road. Where the section of the relief road is too narrow a segregated cycle way and bridleway will be required.”*

This paragraph does not demand that development areas contribute towards the delivery of the new relief road - it merely expects them to - and it does not specify how each area must contribute. The relief road is a key piece of infrastructure and funding for its delivery must be guaranteed - particularly as there is a large funding gap for the plan overall and infrastructure will have to be prioritised.

The cost of the relief road at £16.7million does not include land acquisition/compensation costs. How can Basildon Council be sure that the road is viable and deliverable?

Whether or not a cycle way and bridleway are required should have been determined as a part of the local plan preparation. This is important as the Highways Impact Assessment and Policy T2 shows that some over capacity junctions will be mitigated by sustainable transport measures only. In addition, where the relief road is narrow, there is no obvious route for a segregated cycle and bridleway.

Paragraph 12 states: *‘development must be supported by sufficient infrastructure to ensure that it is sustainable and does not exceed the capacity of existing infrastructure, including highways.....’*

And yet, supporting evidence for the plan demonstrates that despite mitigation, highways infrastructure will exceed capacity, as will parking, so the Policy does not meet its own requirement in paragraph 12.

The Highways Impact Assessment Parts 1 and 2 modelling shows that despite the relief road and some junction improvements, several junctions in the town will exceed capacity. Mitigation for those junctions is reliant upon sustainable transport provision for which no feasibility studies have been conducted to show that they are achievable and would be sufficiently used to reduce congestion.

There is no modelling to test traffic flows along the relief road and the junctions that it creates. How can Basildon Council be sure that the relief road will be achievable, viable and effective when it has only an indicative design that has not been tested by traffic modelling?

Highways modelling uses journey to work data to determine the flow of traffic in the town but that does not account for through traffic from outside of the Borough/Town and other trips made to access services and facilities within the Town, Chelmsford, Thurrock, Brentwood, the A127, the A12 and beyond.

The “Basildon Parking Capacity and Intervention Study” May 2017 analyses in detail current and projected car park utilisation and concludes that Billericay is under provisioned for car parking. The plan delivers no solutions to this and as more roads become restricted to permit holders only, parking is being increasingly seen on main routes through the town - for example, on Perry Street between the Gooseberry Green and Queens park Roundabouts - impeding the efficient flow of traffic.

There is no mention of the Rail infrastructure in this paragraph. Billericay has limited employment space and many of its residents commute to London. Where the OAN includes a significant proportion of London Overspill it is reasonable to conclude pressure on rail services will increase. With the introduction of new trains, seated capacity will increase by around 26% but there is no mention of what the increased demand will be and whether this increase in capacity will be sufficient.

4. These are the modification(s) Billericay Town Council considers necessary to make the Revised Publication Local Plan legally compliant and/or sound.

Paragraphs 1-13: Replace expect, should and where possible with must and required.

Paragraph 3: Consult with the Tennis and Cricket Clubs to understand whether new sites are suitable and how the facilities provided would be of an equivalent/better standard. State in the policy that the clubs and residents must be included in the relocation process and design.

Paragraph 4: Produce modelling and a design for the junction of H17a with Mountnessing Road to assess the impact ingress from Bellevue and Station Roads. Do not allow the access from London Road into H17a to cut through the open space.

Paragraph 10: Consult with NHS England, Brentwood and Basildon CCG and local GP Services to determine the need or otherwise for the provision of a new GP Hub

within the Policy Area and include this in the plan. If a new GP Hub is required this must be included in the masterplanning.

Paragraph 11:

1. State how each development area must contribute towards the provision of the Relief Road. The relief road must be designed and tested to ensure that it is deliverable and that congestion will not be caused along its route. If traffic flows cannot be adequately mitigated, then housing allocations must be reduced accordingly.

2. Extend the Basildon Cycle Action Plan to include cycle and bridle ways within the policy area and identify a route of the segregated parts where the road narrows. Demonstrate how these will relieve congestion at over capacity junctions and that they are achievable.

Paragraph 12:

1. Highways modelling and Policy T2 must be revisited to demonstrate how sustainable transport measures will mitigate junctions modelled to go over capacity. If further mitigation is required this must be included in the plan to ensure funding and deliverability. In the case of the Radford Way/Stock Road Roundabout, there is very little room to improve the junction. The relief road must be designed and tested to ensure that it is deliverable and that congestion will not be caused along its route. If traffic flows cannot be adequately mitigated, then housing allocations must be reduced accordingly.

2. Produce a parking action plan for Billericay as a whole and ensure that sufficient off and on street and parking is provided in development areas and where new services are located. This should include drop off/pick up provision for the new school.

3. Work with Greater Anglia to understand what the maximum capacity of the railway is and when it would be expected to be delivered and exceeded by demand.

5. Yes we wish to participate at the oral examination.

6. Outline of why we consider this necessary:

The Town Council feels that if it attends the oral examination it will be able to make sure that its suggested modifications are explained clearly, concisely and logically in the presence of both the Planning Inspector and Planners ensuring a positive outcome is reached.

REPRESENTATION 5

1. Policy Number – H17

2. THESE COMMENTS RELATE TO THE TEST OF SOUNDNESS

2a. JUSTIFIED

3. Please see explanation below.

Policy H17 - Not Justified - Green Belt and Landscape.

Policy H17 is not justified because it does not reflect the protection given to Green Belt and valuable landscapes in the NPPF, Local Plan Policy NE5 and places no weight on the recommendations of the evidence base in the Green Belt Reviews 2015/2017 and Landscape Appraisals.

- i) Basildon Council placed greater weight on meeting the OAN than its evidence base which demonstrates the significant harm that would be caused to the Green Belt, landscape character, key views, biodiversity and ancient woodland in this policy area.
- ii) Development is proposed in areas recommended to remain as Green Belt and where there is a low/very low landscape capacity.
- iii) In the NPPF paragraph 159 (2014) and Paragraph 11b (2018) constraints such as Green Belt and Ancient Woodland should be taken into consideration.
- iv) The justification given for this is the provision of a relief road which has not been demonstrated through modelling to either relieve congestion throughout the town or mitigate it back to current (unacceptable levels.) The route, if the relief road is under question, has not been fully costed and traffic flows along its route and at new junctions have not been modelled (for more information please see the submission for Transport Policy T2.)

H17a - Mountnessing Road:

Basildon Council's evidence base shows this area was recommended to remain as Green Belt, is a key view out of the town and includes areas that were not recommended for development due to landscape sensitivity. In addition, the open space is small in comparison to the size of the proposed development and the indicative layout for the new junction shows the road passing through that open space.

1. Basildon Council Green Belt Review 2015 recommends on page 95, that:

"This area contributes to checking unrestricted sprawl of large built up areas and safeguarding the countryside from encroachment and should remain as Green Belt." (In 2017 the review was updated and made no recommendations, however the conclusions for this site remained the same.)

The Basildon Local Plan Policy GB1 paragraph 14.10 acknowledges that *"The openness and permanence of Green Belts has therefore always been a key feature*

of Green Belt policy. The NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open.”

As this site contributes to the checking of unrestricted sprawl of large built up areas, it is meeting that fundamental aim of Green Belt policy. Developing the entire site will therefore cause harm to the Green Belt.

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

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

2(ii) Basildon Council Outline Landscape Appraisals of Potential Strategic Development Sites, page 82 does not recommend the whole site for development and states that the site provides; *“long distance views across West Billericay Wooded Farmlands towards Brentwood”* and that there are *“framed views through breaks in the houses from Mountnessing Road, Station Road, Bellevue and Beaufort Road.”*

Basildon Local Plan Policy NE5 states that:

‘The landscape character and local distinctiveness of the Borough shall be protected, conserved and, where possible, enhanced. Proposals for development shall take into account the local distinctiveness and the sensitivity to change of the distinctive landscape character area as set out in the Borough’s Landscape Character and Green Belt Landscape Capacity Study (2014), or any subsequent review. Development will be permitted provided that it protects, conserves and, where possible, enhances

- a. The landscape character and local distinctiveness of the area including its historical, biodiversity and cultural character, its landscape features, its scenic quality, its condition and its tranquility;
- b. The distinctive setting of, and relationship between, settlement and buildings and the landscape including important views, landmarks and the degree of openness;.....’

and in paragraph 16.40 that *“The NPPF also expects the protection and enhancement of valued landscapes in order to contribute to, and enhance the natural and local environment.”*

This allocation, therefore does not comply with Policy NE5 and the NPPF.

H17c - Land West of Tye Common Road

This area has a low landscape capacity for development, a key view out of the town and experiences surface water flooding. The green belt review is based on a parcel of land that covers a too diverse an area.

3. Basildon Council Green Belt Review 2015, page 106.

The Green Belt review fails to recognise the diverse character across this site. H17c falls within site 5 which is in area 9 and a small part of area 8 of the Green Belt Review 2015, p104. Area 9 is considered only to partly meet purposes 1, 2 and 3 of the Green Belt. However, area 9 covers a diverse area - arable farmland with Curd and Kingsmans Farms on one side and the Blunts Wall area which contains the sporting facilities on the other. Had they been considered separately, would the Green Belt review have come to a different conclusion about site 5 and therefore considered that it fully met purpose 3 of the purposes of the Green Belt?

*“3 - **To assist in safeguarding the countryside from encroachment;** There are roads throughout the area leading to the sports facilities and farms. There is some light industry to the north of the area and some residential properties in the area. The area can be viewed from the roads or is open space and apart from a small area of grassland adjacent to the Billericay Town FC football ground, the area is relatively open in character.*

The majority of land uses are compatible with the countryside therefore this area partly contributes to this purpose.” (Green Belt Review, 2015, page 106.)

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

Considered in isolation, site 5 could also be considered to meet purpose 1 of the Green Belt review.

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

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

In addition, the sporting facilities listed above should not be considered to be a part of the large built up area as outdoor sports are a positive use of the Green Belt.

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

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

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

4(ii) Basildon Outline landscape appraisals of Potential Strategic Development Sites, page 58 states that area 9A has a *“low relative landscape capacity rating because of the openness to public view from nearby roads, views from adjacent residential properties”*, and *“most of site 5 is considered to be of higher sensitivity due to its openness to public view in long distance views from the West and strong character and condition as agricultural landscape.”*

A small part of H17c however, is considered to be less sensitive by virtue of its relationship with the urban edge of Billericay, presumably at Blunts Wall. This is tenuous as it is separated by roads and, as with the rest of site 5, it provides long distance views across the countryside and agricultural landscape.

Basildon Local Plan Policy NE5 states that:

‘The landscape character and local distinctiveness of the Borough shall be protected, conserved and, where possible, enhanced. Proposals for development shall take into account the local distinctiveness and the sensitivity to change of the distinctive landscape character area as set out in the Borough’s Landscape Character and Green Belt Landscape Capacity Study (2014), or any subsequent review. Development will be permitted provided that it protects, conserves and, where possible, enhances:

- a. The landscape character and local distinctiveness of the area including its historical, biodiversity and cultural character, its landscape features, its scenic quality, its condition and its tranquility;*
- b. The distinctive setting of, and relationship between, settlement and buildings and the landscape including important views, landmarks and the degree of openness;.....’*

and in paragraph 16.40 that *“The NPPF also expects the protection and enhancement of valued landscapes in order to contribute to, and enhance the natural and local environment.”*

This allocation therefore, does not comply with policy NE5 and the NPPF.

5. The HELAA shows that H17c is susceptible to Surface Water Flooding. During periods of heavy rain, the water runs down London Road, turns left into Tye Common Road and continues its journey from there. Occasionally, the drains can’t cope and overflow, and at least one house has experienced flooding as a result.

H17d - Frith Wood

This area was recommended to remain as Green Belt, it includes areas that were not recommended for development due to landscape sensitivity and development would impact on Ancient Woodland and the historic setting of the Town.

6. NPPF and Planning Guidance relating to Ancient Woodland: The impact of this policy on the Ancient Woodland requires greater consideration and mitigation measures have not been specified in any detail. There has been no indication as to how the wood would be brought into management. In its decision to route the relief road through the wood on 7th December 2017, subject only to ecological studies (subsequently reversed), Basildon Council did not account for the level of protection afforded to Ancient Woodland through planning guidance and the NPPF - has it also failed to adequately account for it in this policy?

7. Basildon Council Green Belt Review 2015 recommends on page 129, that:

“This area contributes to preserving the setting and special character of historic towns and should remain as Green Belt.

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

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

8. Basildon Outline landscape appraisals of Potential Strategic Development Sites, page 79 considers that this area has a Low or No/Very Low relative landscape capacity for development.

Policy NE5 of the Local Plan states that *“The landscape character and local distinctiveness of the Borough shall be protected, conserved and, where possible, enhanced. Proposals for development shall take into account the local distinctiveness and the sensitivity to change of the distinctive landscape character area as set out in the Borough’s Landscape Character and Green Belt Landscape Capacity Study (2014), or any subsequent review. Development will be permitted provided that it protects, conserves and, where possible, enhances:*

- a. The landscape character and local distinctiveness of the area including its historical, biodiversity and cultural character, its landscape features, its scenic quality, its condition and its tranquility;*
- b. The distinctive setting of, and relationship between, settlement and buildings and the landscape including important views, landmarks and the degree of openness;*
- c. The nature conservation value of the area including the composition, pattern and extent of woodland, forests, trees, field boundaries, vegetation and other features;”*

and in paragraph 16.40 that *“The NPPF also expects the protection and enhancement of valued landscapes in order to contribute to, and enhance the natural and local environment.”*

This allocation therefore does not comply with Policy NE5 and the NPPF.

4. These are the modification(s) Billericay Town Council considers necessary to make the Revised Publication Local Plan legally compliant and/or sound.

1. Reduce the allocations in H17 to respect the recommendations of the Green Belt Review and Landscape Appraisals.
2. Create strategic open space and/or a nature reserve at H17d and specify the terms under which the Ancient Woodland must be brought under active management and by whom. Should the land be gifted to the Council?
3. Provide a much larger buffer for the Ancient Woodland at H17d and ensure that the development here does not negatively impact on existing hedgerows and tree lines.
4. The relief road must be designed and tested to ensure that it is deliverable, effective and that congestion will not be caused at pinch points along its route. Residents should be consulted during the design phase - particularly those who will be most impacted in the Frith Wood Lane/Tye Common Road Area. The benefits of the road must be proven to outweigh the harm to the Green Belt and landscape in the policy area.

5. Yes we wish to participate at the oral examination.

6. Outline of why we consider this necessary:

The Town Council feels that if it attends the oral examination it will be able to make sure that its suggested modifications are explained clearly, concisely and logically in the presence of both the Planning Inspector and Planners ensuring a positive outcome is reached.

REPRESENTATION 6

1. Policy Number – H16

2. THESE COMMENTS RELATE TO THE TEST OF SOUNDNESS

2a. JUSTIFIED

3. Please see explanation below.

Policy H16 - Not Justified

Landlocked: In the Housing and Economic Land Availability Assessment Review 2018, Volume 3, pages 227 and 335, the two parcels of land comprising this site (SS0339 and SS0580) are assessed as being not available and not achievable as access is along a narrow track and the sites are therefore effectively landlocked.

Coalescence: The western part of the development is on Basildon's boundary with Chelmsford. If Chelmsford were to build up to this boundary, then there would be a risk of coalescence.

In the vicinity of Ancient Woodland and forms part of a wildlife corridor: The land north of Potash Road is an important part of the wildlife corridor between Queens Park Country Park and Forty Acre Plantation Wood. Forty Acre Plantation is an Ancient Woodland and designated wildlife site. A significant buffer would be required to protect the ecological value of the wood.

Sustainability: The development is far from Billericay High Street, the station and other local services. Development here would therefore be less sustainable by virtue of its residents reliance on cars. The proposed cycle route the Basildon Action Plan is subject to feasibility study and there is no evidence given to demonstrate whether it would be sufficiently used to mitigate over capacity junctions.

Potash Road is very narrow at this point.

REPRESENTATION 7

1. Policy Number – T3

2. THESE COMMENTS RELATE TO THE TEST OF SOUNDNESS

2a. EFFECTIVE

3. Please see explanation below.

Not Effective

1. Potential schemes identified for Billericay in the Basildon Cycle Action Plan (<https://www.essexhighways.org/uploads/docs/Basildon%20CAP.pdf>), are subject to Feasibility Study and so there is no evidence that they are feasible and achievable. This is important as some over capacity junctions in the town have only sustainable transport measures for mitigation.

Policy T3 (1) states that “

“In order to increase the proportion of residents accessing work, railway services, education facilities, other services and recreational opportunities by foot or by bicycle, the schemes and projects set out in the latest Essex Transport Strategy, Public Rights of Way Improvement Plan and Basildon Cycling Action Plan to improve footpaths, footways and cycling infrastructure as well as the safety of users will be delivered during the plan period.”

However, on pages 55 and 56 of the Action Plan, which can be found here (<https://www.essexhighways.org/uploads/docs/Basildon%20CAP.pdf>) schemes are listed under the title of *“Potential Schemes - Subject to Feasibility Study.”*

2. There is no evidence to show what the level of usage would be and whether that would be sufficient to mitigate over capacity junctions in the Town. Again, this is important as some over capacity junctions in the town have only sustainable transport measures for mitigation.

3. The Basildon Cycle Action Plan does not include cycle and bridle ways within the new development areas.

4. These are the modification(s) Billericay Town Council considers necessary to make the Revised Publication Local Plan legally compliant and/or sound.

1. Undertake feasibility testing for potential cycle routes to determine their achievability and whether they would be sufficiently used to mitigate over capacity junctions. Demonstrate how these would effectively relieve congestion at over capacity junctions.

2. Secure funding for these routes.

5. Yes we wish to participate at the oral examination.

6. Outline of why we consider this necessary:

The Town Council feels that if it attends the oral examination it will be able to make sure that its suggested modifications are explained clearly, concisely and logically in the presence of both the Planning Inspector and Planners ensuring a positive outcome is reached.

REPRESENTATION 8

1. Policy Number – T4

2. THESE COMMENTS RELATE TO THE TEST OF SOUNDNESS

2a. POSITIVELY PREPARED AND EFFECTIVE

3. Please see explanation below.

Basildon Borough Council has conceded that the train service facilities for the Borough need 'significant investment to alleviate existing capacity and reliability problems and to ensure that there is sufficient capacity in future to accommodate growth in rail travel' – Ref. Item 9.57 of the Basildon Draft Local Plan Page 84.

'Provision of an excellent passenger transport network is widely recognized as a key attractor of inward investment and business growth' Ref item 9.60

'Passenger transport is therefore one of the key considerations of the Essex Transport strategy' Ref. item 9.58

There is nothing in the Local Plan or from the rail service provider that support the above quotes.

The Billericay and South Green area have approximately 2500 new houses identified in the latest plan, which will put additional strain on the rail services supporting Billericay.

There will be extra demand from all the stations preceding Billericay as they will also be expanding their housing capacities. London Southend Airport is expanding in flight and passenger numbers, which will add to train use demand.

Current trains can consist of up to 12 carriages. The maximum number of carriages that can be used is restricted by station platform lengths and the infrastructure and constraints at the London Liverpool Street terminus. The current 12 carriage trains carry a maximum of approximately 1000 passengers (provided by Abellio Greater Anglia).

New rolling stock is scheduled in 2019, these units give a maximum of 10 carriages but each carriage is longer than the current unit. The rail provider says that the different size will give increased seating capacity of between 22 to 46% but they could not give a total train capacity, which includes standing passengers, so there is no total capacity figure to be able to compare with the existing rolling stock figure.

The current maximum number of trains per hour (7) out of Southend Victoria to Liverpool Street cannot currently be increased because from Shenfield onwards the rail system is shared by a number of other lines also converging on Liverpool Street. Another constraint is Bow Junction, which requires remodeling.

Two reports (Network Rail Anglia Route Study - March 2016 and Network Rail Specifications - Anglia - March 2016) show their forecasts for future train services. The former mentions an extra two 8 car trains but only if there are changes to train schedules, track systems (signaling) and times between the trains (the headway). The latter report shows no increase in service through to 2043, whereas there is an expectation of passenger increases of +32% by 2023.

Using the Trip Generation figures quoted in the HLDF (dated 14/07/2017) for Options 1, 2 and 3 (Pages 71 and 72) these would equate to an approximate daily requirement of:

1 extra 10 carriage train for Option 1,

1 extra 10 carriage train + 1 extra 5 carriage train for Option 2,

2 extra 10 carriage trains for Option 3.

These are the requirements for Billericay only, it does not take into consideration the extra requirements to support the additional houses being built around stations prior to Billericay or the expansion in air passengers using London Southend Airport.

There is no defined plan on how to expand the train services to meet future passenger increases. In the latest IDP the section relating to Public Transport - Rail Services - there were some broad ideas of what changes Abellio Greater Anglia were considering to improve the services. Unfortunately the content was generalized and was related to the whole region, it was non specific. Billericay Town Council contacted Abellio Greater Anglia to ask what specifically would be happening to the Southend Victoria to London Liverpool Street line. Abellio Greater Anglia could not give an answer as they do not know.

Most of the housing sites (especially in SW Billericay) are on the periphery of the town with currently poor or infrequent public transport. If the IDP is to meet the requirement of getting people into the town centre, the rail station and beyond using sustainable means, without use of a car, reducing carbon emissions and congestion (Ref. 9.60 of the Draft Plan), then public road transport services have to improve significantly.

Access into Billericay station is via two points both from Radford Way. One is the one way system leading to the main station entrance and then the exit and the other access is via the main car park. The one way system is small, congested and has only a few drop off points. It also has to accommodate cars, taxis, frequent buses, cycles and pedestrians. A zebra crossing at the station entrance further restricts vehicle movement in this area. At peak times the whole area is very congested creating traffic jams and queues in both directions of Radford Way, the situation is not helped by having a petrol station on that corner. The entrance into the car park acts as a rat run where people are dropped off near to the station entrance. Cars then have to try to filter into the traffic already in the one way system. The

congestion is already high and will only get worse with the inevitable increase in traffic when the additional houses are built.

Parking facilities at the station are already stretched with minimal car space markings in place. There is no space to increase current maximum parking space numbers unless the area is made into a multi-level car park. The only other car park in the vicinity is in Radford Crescent, this is always full as it is near the station and cheaper. The fact that this area has now had its category changed for industrial use could result in it being changed into an industrial unit and the 107 car spaces lost.

4. These are the modification(s) Billericay Town Council considers necessary to make the Revised Publication Local Plan legally compliant and/or sound.

The rail service provider needs to get an estimate from each of the Councils to provide detail on the number of houses being built in their area that has access to a main line station (e.g. Wickford, Rayleigh, Hockley etc. and predictions of the increase in flights/passengers for London Southend Airport so that they can provide a plan of what actions they are going to take and how they are going to cope with the increase in passenger numbers from now to 2043 and beyond.

An integrated, coherent public transport system needs to be planned and gradually introduced as the houses are built. This is to support:

The station (especially at peak times)

Get to the town centre during the day and to neighbouring towns and hospitals.

Reduce congestion, emissions/air pollution and need for car parking

There are parking issues within Billericay already and nowhere around the centre to create more.

The infrastructure, layout, traffic movement and parking facilities need to be assessed and improvements made to reduce/restrict congestion and possible gridlock around the rail station area at peak times.

5. Yes we wish to participate at the oral examination.

6. Outline of why we consider this necessary:

The Town Council feels that if it attends the oral examination it will be able to make sure that its suggested modifications are explained clearly, concisely and logically in the presence of both the Planning Inspector and Planners ensuring a positive outcome is reached.

REPRESENTATION 9

1. Policy Number – H25, H26, H28

2. THESE COMMENTS RELATE TO THE TEST OF SOUNDNESS

2a. JUSTIFIED

3. Please see explanation below.

Within the latest Housing Policy from Basildon Borough Council they identify a breakdown of the required percentages of certain house sizes (e.g. small – 1 to 2 bed, medium – 3 bed, and large – 4 bed), Reference Item 11.208 and 11.210 (Table 11.6) and also the differing mix required for affordable housing, Item 11.210 (Table 11.8).

Policy H25 - Item 2, gives the guideline that any site with 10 or more homes on it is **generally** subject to the 40% 1-2 bed, 40% 3 bed and 20% 4 bed rule. There will always be the odd exception.

The Policy document identifies the various plot sizes in Hectares and numbers of houses for each site but not what the mix of houses is, it is therefore difficult to easily identify whether these guidelines/requirements are being met, the same problem applies for affordable homes.

It is not clear what the mix of houses is for any or all of the sites on H17 (South West Billericay) or indeed any other site.

Going by the guidelines, site H17c, which has over 600 houses, should include some **‘specialist accommodation for older people on the site, which accounts for 10% of the total number homes being delivered’**. This accommodation should comprise of sheltered housing and/or extra care accommodation.

The details for site H17c does not mention such accommodation, how many units are included or how it is used in the calculation of the number of homes being built on the site – We assume that one unit equals one home.

There are a number of caveats for all of the ‘guidelines/requirements’ such as:–

Policy H26 Item 3 - Affordable Housing Provision (Page 147) – ‘The size mix of affordable housing should be determined on a site by site basis in discussion with the Council’s Housing Service, having regard to the Council’s latest Housing Strategy and the overall mix of development proposed and its locality’. Similar views expressed in Item 8 (Page 147) of the same Policy.

In other words housing size mix and type may not necessarily be as per guidelines for each site but – We presume – these guidelines must be met over the whole Borough Plan.

Item 11.211 (Page 143) – ‘The Council will keep the requirement for different housing types and sizes for different tenures under periodic review and the most up to date requirements will be set out in the Council’s separate Housing Strategy.’

4. These are the modification(s) Billericay Town Council considers necessary to make the Revised Publication Local Plan legally compliant and/or sound.

Item 11.6 (Page 91) – The housing detail provided does not affirm that the supply of houses meets the need for the 40% 1 – 2 bed, 40% 3 bed and 20% 4 bed, mix of houses, it purely gives the number of houses per site.

Item 11.8 (Page 92) – There are no figures shown for every site that show the number of affordable houses included, so we are unable to assess whether the affordable houses percentage requirement for each site is being met.

Item 11.22 (Page 94) – There are no figures against each site that clearly identifies how many units for older people are included on the site. There are guidelines that say if there are over 600 houses on a site 10% should cater for older people, either sheltered housing and/or extra care accommodation. With no allocation figures being provided we cannot see whether this requirement is met.

Policy H28 Item 1 – Affordable Housing Provision (Page 138) – All sites with over 11 houses has to have the affordable housing provision applied (31%), so this requirement will have to be met on all Billericay H17 sites. No allocations were mentioned in the document meaning we are unable to confirm the requirement is being met.

Confirm if affordable homes also become part of the general house size mix numbers or are they mutually exclusive.

The Council has identified the need at site (H17b) for Primary school and early years provision. It has also identified the need for additional GP facilities but no direction as what form that will take or where.

Basildon Council have come up with numbers of 'houses' per site so the Town Council presumes that they have an idea of the mix of houses, if not the type e.g. affordable, private etc., and what if any, 'old peoples' facilities are included. Information regarding the mix of houses needs to be made clearer in the plan even if they are provisional.

5. Yes we wish to participate at the oral examination.

6. Outline of why we consider this necessary:

The Town Council feels that if it attends the oral examination it will be able to make sure that its suggested modifications are explained clearly, concisely and logically in the presence of both the Planning Inspector and Planners ensuring a positive outcome is reached.