

GREAT BURSTEAD AND SOUTH GREEN VILLAGE COUNCIL

RESPONSE BASILDON BOROUGH COUNCIL'S REGULATION 19 LOCAL PLAN 2018

POLICY SD1 (Strategic approach to sustainable development)

POLICY SD2 (Settlement hierarchy and distribution of growth)

UNSOUND, INEFFECTIVE AND UNJUSTIFIED

Great Burstead and South Green Village Council strongly believes that the Local Plan is unsound, ineffective and unjustified on the following grounds:

Currently the village has approximately 2,500 households, the planned developments would add 500 households, a massive increase of 20%. This proposed increase is disproportionate to the existing village and is greater than the planned percentage increase in other areas of the borough. SA Chapter 6, paragraph 5.23 states that *'Dwelling provision within Billericay has increased significantly from 1,860 to 3,034 resulting in a significant increase in the areas of greenfield land being developed beyond town's existing urban area (80ha-114ha).'* The village is a rural area and cannot absorb an increase of 20% without significant detrimental impact on existing residents and new residents. All the planned development is on the green belt which further damages the rural aspect of the village. SA Chapter 3, paragraph 3.114 states *'Billericay and Burstead have an above Borough average provision of natural green space and outdoor sports facilities, but an undersupply of urban parks and gardens and smaller amenity space.'*

The infrastructure of the village cannot cope now. The roads have already reached capacity with some junctions already over capacity. Many of the roads are twisting, narrow country lanes. The fabric of the roads is now damaged by potholes due in part to the volume of traffic from existing households, and vehicles becoming larger with more through traffic. There is only one GP surgery. The non-faith primary school is fully subscribed and the faith primary school, which draws pupils from a wide catchment area beyond the parish, is also fully subscribed. There is very limited parking at a small parade of shops. The roads leading to Basildon Hospital, which serves the area, are often at a standstill due to the amount of patients trying to access the service and the lack of parking provision. This will be worse when there are more patients from new developments. Over the years new developments have sprung up in the village but the infrastructure has never been improved to support those developments resulting in an infrastructure that is not able to cope now.

Infrastructure must be put in place and upgraded before any development takes place. Roads, rail, schools, GP services, hospital service, policing, fire brigade, water supplies and sewerage provision, SA Chapter 3, paragraph 3.102 states *'In the hillier parts of the Borough in Langdon Hills and Billericay, smaller reservoirs and /or water towers are also required to maintain water pressure and distribute a constant supply to customers'*. However, **no** new such facilities are noted with in the plan, leisure amenities must all be provided before additional housing. Rather than cuts to services, which are already being experienced, services must be improved before

development. This improved infrastructure will alleviate the strain on infrastructure that is being experienced now. This is a paramount consideration otherwise residents will suffer a severe loss of amenity and new residents will not experience the benefits of moving to the village. Prior improvements to infrastructure must be part of robust, legally binding time specific agreements with financial penalties with developers before any development takes place.

Parking is a problem which will be exacerbated by these developments. There is little parking at the local parade of shops at South Green, Grange Parade and the Billericay town centre does not have enough parking to accommodate those who wish to visit now. Extra housing will put further pressure on parking which is at a premium currently.

Pollution from vehicle exhaust fumes will be increased. Approximately 1,000 extra vehicles from the 500 new homes will have a detrimental effect on air quality. The school run, which at times brings road in the area to a standstill, will not only create more fumes but more congestion. The health of residents, particularly children, who attend the two oversubscribed primary schools will be affected by increased pollution. The Local Plan (page 219 - 16.51) states "*The main source of air pollution in the Borough is therefore from traffic emissions, particularly along major routes and at key junctions.*" Under the Environment Act 1995 it is the responsibility of local authorities to review air quality. The Local Plan seeks to encourage sustainable travel but it is a fact that people are steadfast in their use of private vehicles for transport and with more development more vehicles and more pollution.

Leisure facilities in Billericay town, such as Lake Meadows, will attract more residents from new developments. This facility has a very small car park which has also to accommodate those visiting the swimming pool. There will not be enough parking and the facilities themselves will be further stretched.

Rail services are crucial to village residents many of whom commute to London from Billericay station. SA Chapter 3, paragraph 3.127 states '*16% of residents travel by train. London being the predominant location.*' The rail services are already overstretched with **no** increased services planned or noted in the plan. Crossrail will not alleviate problems as Crossrail stops at many stations closer to London and residents from our village favour a non-stop service due to the distance involved. Vehicular access to Billericay station is gridlocked at peak times. The roads around the station were not built to accommodate current traffic levels. The access points to the station are log jammed and difficult to negotiate. The tight, restricted space has to accommodate traffic into the fully booked car park, traffic to a dropping off point, a zebra crossing, a taxi rank, buses, pedestrians accessing the station and an exit point into which all the exiting traffic then has to filter out onto the busy Radford Way Road. The station cannot cope now and further developments will exacerbate the existing problems. Other towns preceding Billericay are also planned to develop causing the trains to be packed with extra passengers before they reach Billericay station. Great Anglia cannot provide projected figures for future rail usage. Basildon Borough Council's Local Plan acknowledges (page 84 - 9.57) "*As with the Borough's strategic road network, significant investment in the railway network passing through the Borough is needed to alleviate existing capacity and reliability problems and to ensure that there is sufficient capacity in future to accommodate growth in rail travel.*"

The Village Council is not against development and understands that communities grow. However, a 20% increase cannot be accommodated without significant investment in infrastructure which would ultimately change Great Burstead and South Green from being a village into an urban sprawl.

POLICY H19 B
LAND SOUTH EAST OF GREENS FARMS LANE, BILLERICAY
H19B IS A 3HA RESIDENTIAL PROPOSED EXTENSION TO SOUTH GREEN
SNAILS HALL FARM 100 HOUSES - JUNCTION OF
OUTWOOD COMMON ROAD/GREENS FARM LANE

UNSOUND, INEFFECTIVE AND UNJUSTIFIED

Roads

This irregular shaped triangular plot wedges itself into the narrow country lane of Outwood Common Road and the extremely busy Greens Farm Lane. The junction of Greens Farm Lane and Outwood Common road is prone to accidents. There is restricted vision for traffic turning right into Outwood Common Road to join the A129 (Southend Road) due to the winding nature of the road. 100 more houses will further exacerbate these problems. Staggered traffic lights are planned at the junctions of Outwood Common Road/A129 (Southend Road), Grange Road/A129 (Southend Road), Hickstars Lane/A129 (Southend Road), to accommodate the planned housing. These junctions are already at capacity. Presently pedestrians cannot cross Outwood Common Road at peak times. Traffic jams trail down Outwood Common Road making it impossible for traffic to join it from Greens Farm Lane. Although the traffic lights might help now when there are an extra 100 houses these measures will not be enough to alleviate the problems. Motorists will use their sat-navs to turn left at the bottom of Greens Farm Lane taking them through the narrow roads of Outwood Common Road, Outwood Farm Road and Coxes Farm Road to avoid the traffic lights. Thus those living in rural areas will be affected by more traffic.

Traffic from this site may use the A129 (Southend Road) to reach the town centre of Billericay and will need to negotiate the roundabout forming a junction between A129 (Southend Road)/A176 (Noak Hill Road). This junction is at a standstill during peak times with long queues of vehicles down the A129 (Southend Road - Bell Hill) waiting to negotiate the roundabout and trying to filter into the A176 (Noak Hill Road) traffic.

Green Belt

Damage to and erosion of the green belt. Indeed, SA Policy H26 states that this development '*... scored significant adverse effects on SA objective 3 (biodiversity). This is because the allocation is located on land of ecological value.*'

Schools

South Green Primary school is already oversubscribed, St Peters RC Primary School, Coxes Farm Road, is already oversubscribed. The secondary school catchment area is Billericay School. However, there are many developments planned nearer to Billericay school. Since those who live nearest will have a greater opportunity to attend Billericay School those who live on the H20B site may have to attend both primary and secondary schools distant to their homes and outside their catchment area thus creating more traffic, and more school runs. SA Policy HC3 of the Local Plan (page 167 - 13.26) states "*The NPPF places great importance on ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities are expected to take a proactive, positive and collaborative approach to promoting development that will widen choice in*

education by giving great weight to the need create, expand or alter schools." Investment in schools is of paramount importance and developers should be required to contribute.

Health - Doctors Surgery

There is only one very small GP surgery serving the whole parish. SA Policy H19 states that *'... significant positive effects are likely to be generated through the developments close proximity to existing and planned health and recreation facilities.'* However, **no** new planned health facilities are noted within the plan. Further, the Local Plan gives little indication of concrete proposals regarding health provision for example the Local Plan (page 164 - 13.15) states *"It will be for NHS England and the CCG, in consultation with the service providers, to determine the types of interventions needed in each area to support growth."* Basildon Hospital struggles to meet targets now, extra demand will only exacerbate the problem.

Ancient Settlements Merging

This site is in the parish of Billericay Town Council and the housing will merge the ancient and historic parish of Great Burstead and South Green and Billericay Town. The plan should not accommodate developments that merge distinct and separate areas. The village will be subject to urban sprawl if this site is developed. Urbanisation and the damage to the rural aspect of the area will have a detrimental effect on residents.

Ecology and Wildlife

Previously 70 houses were planned for this irregular plot of land, now it is planned a 100 houses will be crammed into it. These 100 homes will detrimentally affect the neighbouring leisure site of Mill Meadows which they will abut. Wild life which abounds in the area will be affected and the ecological character and nature of the area will be damaged. The HRA (page 94) states *"Loss of land, particularly agricultural land uses or semi-natural habitat has the potential to affect the bird SPA and Ramsar bird populations which rely on offsite habitats for foraging and loafing."*

Water, Sewerage and Flooding

Flooding is a major issue with this site. Water flows down Greens Farm Lane onto the Outwood Common Road and flood water often accumulates at the junction of Greens Farm Lane and Outwood Common Road. The HRA (page 94) states *"Capacities in the local WRC and the local sewerage network to serve the proposed level of residential growth at this site are uncertain therefore reduced water quality effects cannot be rule out in the absence of mitigation."* The HRA also states (page 94) *"Development on this greenfield location could create impermeable surfaces and thereby increase surface drainage rates. This has the potential to increase flood risk at downstream European sites, in combination with other greenfield development proposed by the Local Plan."*

Local Shops

The small parade of shops has very limited parking where residents drive around waiting for a car parking space to become free.

**POLICY H20
9.5HA OF LAND
LAND EAST SOUTHEND ROAD (A129) BILLERICAY - PROPOSED 190 HOUSES**

UNSOUND, INEFFECTIVE AND UNJUSTIFIED

This site is adjacent to the Southend Road (A129), a busy road connecting Basildon/Wickford. Wherever it is chosen vehicles enter/exit this site will cause problems on this very busy road. Presently if a vehicle is stopped on this road it causes long queues if vehicles are slowing down, stopping to enter and exit the site traffic congestion will occur. Those who live on the site may choose not to drive towards Billericay to avoid the proposed traffic lights at Outwood Common and travel along Coxes Farm Road a winding country lane that also has to cope with the traffic to St Peters RC School as most pupils arrive by private vehicle plus additional traffic from site H19B.

Urbanisation

This site will create an urbanising effect on what is currently open countryside. This area has increased in size by 2.5ha from 7ha to 9.5ha.

Green Belt

Damage to and erosion of the green belt. SA Policy H20 states that this development '*...scores significant adverse effects on SA objective 3 (biodiversity). This is because the allocation is within 1km of Mill Meadows SSSI and within 1-2km of Norsey Wood SSSI.*'

Schools

South Green Primary school is already oversubscribed, St Peters RC Primary School, Coxes Farm Road, is already oversubscribed. The secondary school catchment area is Billericay School. However, there are many developments planned nearer to Billericay school. Since those who live nearest will have a greater opportunity to attend Billericay School those who live on the H20 site may have to attend both primary and secondary schools distant to their homes and outside their catchment area. Creating more traffic, more school runs. Policy HC3 of the Local Plan (page 167 - 13.26) states "*The NPPF places great importance on ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities are expected to take a proactive, positive and collaborative approach to promoting development that will widen choice in education by giving great weight to the need create, expand or alter schools.*" Investment in schools is of paramount importance and developers should be required to contribute.

Health - Doctors Surgery

There is only one very small GP surgery serving the whole parish. The Local Plan gives little indication of concrete proposals regarding health provision for example the Local Plan (page 164 - 13.15) states "*It will be for NHS England and the CCG, in consultation with the service providers, to determine the types of interventions needed in each area to support growth.*"

Water and Sewerage

Surface water accumulation is currently a problem with this site. The Habitats Regulations Assessment (page 94) states "*Development on this greenfield location could create impermeable surfaces and thereby increase surface drainage rates. This has the potential to increase flood risk at downstream European sites, in combination with other greenfield development proposed by the Local Plan.*"

Sewerage infrastructure would require upgrading with even with that the HRA (page 94) states *"However, reduced water quality effects cannot be rule out in the absence of mitigation."*

Ecology and Wildlife

These 190 homes will detrimentally affect the neighbouring countryside. Wild life which abounds in the area will be affected and the ecological character and nature of the area will be damaged. The HRA (page 94) states *"Loss of land, particularly agricultural land uses or semi-natural habitat has the potential to affect the bird SPA and Ramsar bird populations which rely on offsite habitats for foraging and loafing."*

Local Shops

The small parade of shops has very limited parking where residents drive around waiting for a car parking space to become free.

POLICY H18 8HA OF LAND LAND SOUTH OF WINDMILL HEIGHTS, BILLERICAY PROPOSED 200 HOUSES

UNSOUND, INEFFECTIVE AND UNJUSTIFIED

Roads

This site is set along the A176 (Noak Hill Road) and Kennel Lane. As its name suggests Kennel Lane is an ancient lane. It dips, winds and twists its way to the A176. The road structure in this area is part of the ancient history of the area. As it would need to be upgraded to accommodate housing on this site part of the ancient character of the area would be lost. 200 houses would possibly have in excess of 400 vehicles all of which would be exiting onto the A176, a road which is already at capacity. This site has been increased by 5.5hs from 2.5ha to 8.5ha and the housing allocation increased from 70 to 200 homes.

Water, Sewerage and Flooding

Flooding is a major concern in Kennel Lane. In the very recent past houses at the lower end of Kennel Lane have been flooded necessitating the attendance of fire appliances to pump them out. Essex County Council planned at one time to introduce flooding lakes to take the excess water but this plan is now in abeyance. Building at this level of Kennel lane will create hard surfaces where water will drain down onto the lower levels of Kennel Lane exacerbating the flooding risk. Originally 70 homes were planned at this site now it is 200. The HRA states (page 93) *"reduced water quality effects cannot be ruled out in the absence of mitigation."*

The HRA goes on to state (page 93) *"Development on this greenfield location could create impermeable surfaces and thereby increase surface drainage rates. This has the potential to increase flood risk at downstream European sites, in combination with other greenfield development proposed by the Local Plan. "*

Urbanisation

This site will create an urbanising effect on what is currently open countryside.

Green Belt

Damage to and erosion of the green belt. In fact, Policy H18 states that this development '*... scores significant adverse effect on SA objective 3 (biodiversity)...because these allocations are located on greenfield land designated as a Species Alert Area and within 1km of Mill Meadows SSSI and 1-2km of Norsey Wood SSSI.*'

Schools

South Green Primary school is already oversubscribed, St Peters RC Primary School, Coxes Farm Road, is already oversubscribed. Primary schools outside the catchment area may be the only alternative creating more traffic, more school runs. Policy HC3 of the Local Plan (page 167 - 13.26) states "*The NPPF places great importance on ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities are expected to take a proactive, positive and collaborative approach to promoting development that will widen choice in education by giving great weight to the need create, expand or alter schools.*" Investment in schools is of paramount importance and developers should be required to contribute.

Health - Doctors Surgery

There is only one very small GP surgery serving the whole parish. The Local Plan gives little indication of concrete proposals regarding health provision for example the Local Plan (page 164 - 13.15) states "*It will be for NHS England and the CCG, in consultation with the service providers, to determine the types of interventions needed in each area to support growth.*"

Ecology and Wildlife

These 200 homes will detrimentally affect the neighbouring countryside.. Wild life which abounds in the area will be affected and the ecological character and nature of the area will be damaged. The HRA states (page 93) "*Loss of land, particularly agricultural land uses or semi-natural habitat has the potential to affect the bird SPA and Ramsar bird populations which rely on offsite habitats for foraging and loafing.*"

Ancient Settlements Merging

This site is in the parish of Great Burstead and South Green but will create housing on the edge of Billericay Town parish. The plan should not accommodate developments that merge distinct and separate areas. The village will be subject to urban sprawl if this site is developed. Urbanisation and the damage to the rural aspect of the area will have a detrimental effect on residents.

POLICY H21B

1.5HA OF LAND

MAITLAND LODGE, GREAT BURSTEAD, BILLERICAY- 20 SELF-BUILD HOMES

UNSOUND, INEFFECTIVE AND UNJUSTIFIED

Urbanisation

This site will create an urbanising effect on what is currently open countryside while also creating urban sprawl.

Green Belt

Damage to and erosion of the green belt. The HRA states (page 95) "*The Plan identifies three small parcels of land as being suitable specifically for self-build. The sites are adjacent to*

existing settlement boundary of Billericay and whilst suitable their development potential would not be realised unless they were allocated through policy and subsequently removed from the extent of the Green Belt. Issues as detailed above for H21 may result from this policy."

Schools

South Green Primary school is already oversubscribed, St Peters RC Primary School, Coxes Farm Road, is already oversubscribed. The secondary school catchment area is Billericay School. However, there are many developments planned nearer to Billericay school. Since those who live nearest will have a greater opportunity to attend Billericay School those who live on the H21 site may have to attend both primary and secondary schools distant to their homes and outside their catchment area. Creating more traffic, more school runs. Policy HC3 of the Local Plan (page 167 - 13.26) states "*The NPPF places great importance on ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities are expected to take a proactive, positive and collaborative approach to promoting development that will widen choice in education by giving great weight to the need create, expand or alter schools.*" Investment in schools is of paramount importance and developers should be required to contribute.

Ecology and Wildlife

Wild life which abounds in the area will be affected and the ecological character and nature of the area will be damaged. SA Policy H21 states that self-build allocations scores '*... significant adverse effects on SA objectives 1 (landscape, countryside and green spaces), 2 (cultural heritage) and 3 (biodiversity)*' with no positive effects noted. The HRA states (page 95) "*Loss of land, particularly agricultural land uses or semi-natural habitat has the potential to affect the bird SPA and Ramsar bird populations which rely on offsite habitats for foraging and loafing.*"

Local Shops

The small parade of shops has very limited parking where residents drive around waiting for a car parking space to become free.

Roads

This off the busy A129 (Southend Road). Entrance and exit to the site will cause highways issues as the site could generate the movement of a possible 40+ vehicles near the already congested staggered junction of Mill Road, the A129 (Southend Road) and Coxes Farm Road.

Flooding

Residents report flooding is a concern.

Health - Doctors Surgery

There is only one very small GP surgery serving the whole parish. The Local Plan gives little indication of concrete proposals regarding health provision for example the Local Plan (page 164 - 13.15) states "*It will be for NHS England and the CCG, in consultation with the service providers, to determine the types of interventions needed in each area to support growth.*"

4. PLEASE SET OUT THE MODIFICATION(S) YOU CONSIDER NECESSARY TO MAKE THE REVISED PUBLICATION LOCAL PLAN LEGALLY COMPLIANT AND/OR SOUND, INCLUDING ANY REVISED WORDING.

- *Much less planned housing development*
- *Integrated road network plans which includes more in depth modelling also covering minor routes as major routes become clogged minor routes are used while addressing the resultant pollution.*
- *Integrated specific health plans that provide accurate figures of future users. This plan must provide for adequate GP, hospital and other local health care provision including social.*
- *Integrated travel plans that require rail companies to submit projected numbers of future rail users, costs and how the excess of passengers will be accommodated.*
- *Education plan that works on accurate substantive projected figures to ensure school places are available locally.*
- *A detailed and robust plan that expressly addresses the issues of flooding, known and projected, that covers how potential water shortages and pressure on sewerage systems will be provided for.*
- *Ecological concerns regarding wildlife are treated as part of the essence of a village and its surroundings and ensures wild life is preserved.*
- *A plan that does not create an urbanisation of the countryside.*
- *A plan that preserves the Green Belt and does not erode and destroy such a valuable asset which once lost cannot be replaced.*
- *A plan that ensures that the ancient settlements of Billericay and Great Burstead and South Green do not merge but remain separate parishes.*
- *A plan that outlines in detail the amount of vehicles, traffic volume, new residents, rail passengers, students and patients that will be generated by housing developments and acknowledges the extreme challenges that will arise with the current plan.*
- ***A completely new village, like Dunton Hills Garden Village, is suggested by Village Council rather than attaching developments to existing settlements with all the problems that brings. A new village would incorporate all the necessary infrastructure and sustainability and be purpose built for modern living.***