



## **BOWERS GIFFORD & NORTH BENFLEET PARISH COUNCIL**

Basildon Borough Council  
Planning Policy  
Basildon Borough Council  
St Martins Square  
Basildon  
Essex  
SS14 1DL

30<sup>th</sup> March 2016

Dear Sirs

### **RE: Bowers Gifford & North Benfleet Parish Council – Draft Local Plan response 2016**

Bowers Gifford & North Benfleet Parish Council having considered the Draft Local Plan documentation in regard to the proposals for the settlement of Bowers Gifford and North Benfleet believe that the proposals within the Draft Local Plan 2016 documents are flawed and the proposals identified for the village of Bowers Gifford and North Benfleet and adjacent site in Pitsea are unacceptable.

#### ***Introduction:***

Bowers Gifford & North Benfleet Parish Council accepts, in part, that some housing needs to be built in the area to sustain the village for future generations, however, the proposed 650 properties is excessive and there needs to be minimal conversion. The Parish Council consider that the outstripping of the Green Belt in the area identified in the Draft Local Plan is also unacceptable and would lead to further encroachment, despite the use of the Strategic Gap, resulting in the merging of the two settlements of Bowers Gifford & Pitsea over time and beyond 2034.

Bowers Gifford & North Benfleet is a community of approximately 700 dwellings and is traditionally a village of cottages and chalet bungalows but it is also a village of two halves

when it comes to ground area per dwelling. At the southern end of the village properties have what is considered small gardens for the village although reasonably large elsewhere by modern day standards. However, travelling north, the plot sizes generally grow much larger, which in part helps maintain its rural openness. To introduce large scale development of 600 homes plus 50 infill and related facilities , on a large swathe of a constricted size area, would upset the traditional balance of the village as well as escalating the current traffic congestion and the air pollution problems , which exist, at the B1464 junction.

The Plan states in 4.6 that it is about “ quality of life “ and existing residents, who for various reasons have brought into village life, should be a considered before proposals are put in place.

Brandon Lewis, Housing Minister, stated in 2015 that “We (the government) have made it clear that development on Green Belt should be exceptional and the last resort, and even then should be carried out only with great care and consideration. If local authorities make a Green Belt area a developable piece of land, they should do so only as part of a full review and a local plan process. *Green belt should be predesignated only in exceptional circumstances and as a last resort.*” Furthermore, the National Planning Policy Framework (NPPF) notes Green Belt as one of the environmental constraints on development in the framework and local planning process. A core principle of the framework is that planning authorities should recognise the intrinsic character and beauty of their countryside. The characteristics of different landscape and the importance of ensuring that development is suitable for the local context should be recognised.

The Parish Council believe that Basildon Council in producing the Local Draft Plan in many instances has used desk-top exercises to arrive at their conclusions, within the Draft Local Plan document, in order to meet the Government’s requirement by 2034 and the Parish Council considers that Basildon Council needs to revise their options and further consult with the Parish Council.

### **1.1     *Balanced development levels:***

Basildon Borough Council states within the Draft Plan that “a development level of 14% needs to be met for future growth and development” These figures transposed to the village of Bowers Gifford (assuming 700 properties) equates to 98 dwellings.

Basildon Borough Council’s Balanced Plan increases the number of village dwellings by 86% and once infill (50 properties) in plotland areas is added to this the figure would rise to between 93% - 100%.

This virtually doubles the size of the village and equates to far more than other areas across the Borough who have Green Belt and therefore is an unfair assessment and proposals for development within the village and surrounding areas should be re-considered.

The intention to remove the whole of H13 from the protection of Green Belt status is unfair and would open it up to further development at any time. Anything above the most moderate development into the "strategic gap" between Pitsea and Bowers Gifford would contravene the Judgement delivered by the Secretary of State on Meridian Strategic Land's appeal for Little Chalvedon Hall Farm which was specifically designed to stop Bowers Gifford being subsumed and open the way for this area to be developed against the will of government. There should be no incursions from the Bowers Gifford side as this was a significant part of the judgement from the Secretary of State. ( Ref: 2204850, 17 June 2014)

The proposed infill plan is unbalanced and biased and although the Parish Council would agree to an infill policy this should remain as one per plot, with comparable accepted frontage and overall area. Subdivision of plots should not be allowed and any development should be sympathetic to the village tradition and comply with Basildon Borough Council planning policies.

### ***2.1 Strategic Gap***

The proposed encroachment from Pitsea in the Strategic Gap would again go directly against the judgement from the Secretary of State in 2014 and it's width not wide enough to restrict urban sprawl. It is unclear from the Draft Plan whether some or all of the sports facilities would be incorporated within the Strategic Gap (H13). The movement of some football pitches within the Gap might be acceptable but changing facilities, club houses and stadia should remain within the development of Pitsea, with restrictive covenants, with Bowers Gifford retaining its' Green Belt classification and these facilities only accessed from either Pitsea or the B1464 with no road access from Bowers Gifford and all footpath access from Bowers Gifford restricted from motorised vehicles.

### ***3.1 Alternative acceptable development location***

In order for Basildon Borough Council to meet its targets for housing need the Parish Council would consider 300 dwellings, built in a sympathetic style including height, to meet village traditions. It does however considers that the proposed site (H13) is unacceptable but that an alternative site in North Benfleet adjacent to Burnt Mills Road and set back from Pound Lane would be more suitable.

This would equate to a 43% development increase in the village housing capacity and is 3 times the level Basildon has stated they need and the Balanced Plan aims to achieve. In addition

there would be an option of using the Green Belt between the A130 and Bowers Gifford / North Benfleet as a park and leisure area and invoke a covenant that will protect surrounding areas from future development. The possibility of building a centre for community use and activities, in this location within the Parish, to supplement usage for the increased population, might also be a consideration. Building on this area of North Benfleet would be more palatable and less intrusive and disruptive for all concerned and help retain the village feel.

#### **4.1 Highways**

Development in the North of the village would result in less disruption to residents during construction. The proposed new junction on the A127 and a new road proposing to link up Pound Lane to Courtauld Road would restrict the need for any increase in traffic through Pound Lane and Burnt Mills Road as this would be diverted onto the new road and lessen the traffic impact of development in other parts of the village. The movement of construction traffic could then be contained and access specifically excluded from the south of the Parish. However, the proposed new junction on the A127, creating a link with Wickford, will increase the traffic escape route problems already experienced. It is noted that no current funding exists for this road and a top-up request from Essex County Council would need to be obtained and forthcoming before any development takes place either in the short or long term.

The introduction of industrial developments along the A127 would need to be considered in regard to the road network as there is already impact on the village with the introduction of the Waste Recycling facility in Courtauld Road resulting in the heavier use of our roads by lorries and large vehicles. This would further support the Parish Council's alternative proposals for development in the north of the village.

The B1464 is already over capacity at peak times so any increase in traffic would add to the daily grid lock and air pollution at the junction with Pound Lane and London Road and through Pound Lane to Burnt Mills Road. Thus a development to the north of the village would alleviate much of this.

Sadlers Farm roundabout is referenced within the Draft Plan document as Pitsea when in actual fact it is Bowers Gifford. After ten years of hell this is still not finished, is not a success and does not instil confidence for any proposed new highway construction

#### **5.1 Ilfracombe Avenue**

Basildon Borough Council has stated it is fully aware that Ilfracombe Avenue forms part of the community of Bowers Gifford but within the Landscape Site Appraisal it is perceived as being incorrectly part of Pitsea in relation to the settlements of Bowers Gifford & Pitsea. Ilfracombe Avenue should remain as part of the Parish of Bowers Gifford & North Benfleet and should not be merged, subsumed or encroached upon as part of Pitsea.

## **6.1 Flooding**

The area described as H13 floods heavily, as do many parts of Pound Lane and the plotland areas on this side of the Parish at times of heavy rain. The Parish Council would heavily dispute the statement of Anglia Water of there being no flooding in the area. The North side is less susceptible to flooding. SUDs alone will not resolve the issues of flooding and is another reason for an alternative site for housing to be considered.

## **7.1 School provision**

Page 145 (11.131) states there is no school provision in Bowers Gifford this is an incorrect statement. St Margaret's Primary School, London Road , Bowers Gifford has been located in the Parish of Bowers Gifford for 80 years and is open to all primary school children from 4 – 11 years of age and all faiths. Its current catchment is across the district but it could quite easily accommodate any new primary age children from any accepted development.

## **8.1 New Traveller and Gypsy provision - POLICY H3, H5,H6**

The addition of 15 more sites should be considered in relation to existing enforcement action and possible illegal sites, many of which exist in plotland area. These existing sites should be taken into account when considering the additional sites required and the numbers reduced. In addition adequate enforcement control should be taken on sites which contravene any planning policy.

By Basildon Borough Council's own admission there is no accurate data to work from. The question to be asked therefore is what figures are being used as a base calculator, as there is no accurate data to work from? Are illegal pitches and developments going to be made legal at each 3 to 5 year review?

## **9.1 Wildlife**

Existing wildlife and biodiversity should be protected when considering development within the proposals in the Draft Plan. The proposed area is predominantly a wildlife corridor and extensive research should be undertaken to protect all habitats.

## **10.1 Further comments for consideration:**

- i. Basildon Hospital and local health-care services are already under pressure and cannot cope with increased demands on their services. It is irresponsible to earmark development for several thousand residents district-wide without first mitigating and resolving the problem we already have.

- ii. Many of the proposed 2000 homes in Pitsea and Bowers Gifford & North Benfleet will be occupied, inevitably by commuters. There are three related problems to this (i) C2C have already changed their rolling stock to increase capacity and it is now up to capacity. (ii) Parking around Pitsea Station is fraught, as are traffic levels on the A127 and B1464 at peak times. The Draft Plan proposals go part way to alleviating this but in general finance is reliant on S106 or CIL agreements, money which will only be available after some of the properties are occupied and the above situations have substantially deteriorated. The larger or more major projects will almost certainly require extra funding from either Essex County Council or Government and cannot be relied upon. (iii) Sadler's Farm roundabout continues to be problematical becoming grid-locked at peak times causing the B1464 and Pound Lane junction to back-up with traffic further. If proposals in regard to development at South Benfleet go ahead, together with the proposals for Pitsea and the Parish, this will add considerably to the Sadler's Farm congestion.
- iii. The core principles of the Government's National Planning Policy need to be taken into account in regard to green belt area. There is a need to account for the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, and recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it and to be a creative exercise in finding ways to enhance and improve the places in which people live their lives.
- iv. The Parish Council need to be consulted at each development stage from outline conception to final planned layout and completion.
- v. Assurances that the maintenance costs of any SUD's system utilised will be economically viable for the residents.
- vi. Additional lighting for estate, paths and car parking is to be LED.
- vii. To comply with the governments green travel directives, footpaths should be installed where there is no footpath from approximately 140 meters north of Grange Road, with only another short stretch outside the St Andrew Healthcare facility as part of S106 or Community Infrastructure (CIL) and Government finance. Also safe cycle routes should be implemented through the village, for which government funding is or has already been available.

We hope you will take the above comments into consideration when redrafting Basildon's Draft Local Plan and further consult with the Parish Council and residents of Bowers Gifford & North Benfleet on your proposals.

Yours sincerely



Christine Barlow, Clerk to the Parish Council  
pp Bowers Gifford & North Benfleet Parish Council