



BOWERS GIFFORD & NORTH BENFLEET NEIGHBOURHOOD PLAN

DRAFT SUSTAINABILITY APPRAISAL REPORT

Published by Bowers Gifford & North Benfleet Parish Council under the EU Directive 2001/42 on Strategic Environmental Assessment and the Environmental Assessment of Plans & Programmes Regulations 2004 to accompany the publication of the Bowers Gifford & North Benfleet Neighbourhood Plan

FEBRUARY 2018

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NON-TECHNICAL SUMMARY

1. The purpose of this report is to provide an assessment of any significant sustainability effects resulting from the policies and proposals of the Pre-Submission version of the Bowers Gifford & North Benfleet Neighbourhood Plan. The Neighbourhood Plan has been published for consultation by the Parish Council in line with the Neighbourhood Planning Regulations 2012.
2. The Appraisal Report provides an assessment of the draft policies of the Neighbourhood Plan in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts. The framework of appraisal objectives takes into account the comments made on the scoping report by the statutory consultees.
3. The appraisal has reached Stage D of the process, culminating in this report in readiness for its consultation (Stage E). Since the Scoping Stage B was completed, the focus has been on policy choice and formation, informed by the appraisal framework of objectives. The Parish Council has decided to widen that framework to embrace all but one of the 18 sustainability objectives in the Sustainability Appraisal of the Local Plan. It is this widened framework that has been used to test and modify the draft policies of the Pre-Submission Neighbourhood Plan and the reasonable alternatives.
4. The last iteration of the new Local Plan was published for consultation in 2016. It contained a number of very significant policy proposals affecting the Neighbourhood Area. The consequences of these policies for the Neighbourhood Area may be profound and it is the intention of the Parish Council to use its Neighbourhood Plan in the coming months to demonstrate that there is a more sustainable means of delivering housing growth and supporting infrastructure in this Area.
5. The Parish Council consulted on its proposed sustainability objectives in the Scoping Report. Whilst the statutory consultees were broadly content with those objectives, the Borough Council considered they were too narrow and that the evidence base was too light to serve this purpose.
6. In response, and in the light of the information published in December 2017 by the Borough Council on the direction it proposes to take to developing land east of Basildon in its new Local Plan, the Parish Council has decided to widen the objectives to match those of the Local Plan Sustainability Appraisal and to use the Local Plan evidence base (primarily the High Level Development Framework). This will enable a more consistent appraisal of the Neighbourhood Plan policies with those of the Local Plan that will affect the Parish, most notably Policy H13.
7. In general terms, there is a strong, positive relationship between the Neighbourhood Plan objectives and those of the Appraisal. There is the potential for negative effects in some cases, which is inevitable with the scale of housing growth, but this must be planned for, to keep in general conformity with the new Local Plan, which itself must have regard to national planning policy on meeting housing needs.
8. Importantly, the comparison shows the importance of securing the right spatial plan for the growth that is required within the Parish boundary and on its edges. That

plan will enable the positive effects of these objectives to be accentuated and the negative effects to be moderated and mitigated. This becomes more apparent when comparing the preferred approach of the Neighbourhood Plan with the alternative approach of the Local Plan Development Framework.

9. The most fundamental differences between this concept and range of policies and those of the Local Plan Policy H13 are:

- The exclusion of all development land within the Parish boundary in the Green Belt between Bowers Gifford/North Benfleet and Basildon
- The development of a smaller land area at Pitsea to be accessed through the existing road network
- The allocation of development land at Hall Farm, North Benfleet
- The greater intensification of housing in North Benfleet
- The exclusion of the new distributor road east of North Benfleet and the realignment of Pound Lane through North Benfleet
- The upgrading of Pound Lane between the new A127 junction and North Benfleet to accommodate new housing at Hall Farm and North Benfleet and to serve the new employment land at Burnt Mills
- The downgrading (with the lowering of its speed limit to 20 mph) and redesign of Pound Lane through the remainder of the new village to London Road to discourage through-traffic between the A127 and London Road/A13 and to create a pedestrian-friendly environment and a new cycle lane and bus service infrastructure
- The creation of an 83Ha Country Park in the Green Belt between the new village and Thundersley to its east

10. The appraisal indicates that the policies will have a number of positive sustainability effects, especially in relation to those appraisal objectives promoting social and economic benefits. The negative landscape and pollution effects are inevitable with such a step-change in the quantum of development that must be planned for. The challenge faced and addressed by the policies, taken as a whole, is how to arrange new development within the existing settlement pattern so that the essential, distinct character of those settlements, and their essential Green Belt setting, is maintained.

11. This appraisal has taken into account the appraisal of the Local Plan Policy H13 in terms of its local biodiversity effects and effects on the wider series of European Nature Sites in respect of the Habitats Regulations. As the Neighbourhood Plan policies are of a nature and scale that fall within the parameters set by that appraisal, these effects will be no greater than those of H13, and may be slightly fewer. If necessary, a separate screening for these effects under the Habitat Regulations will be carried out and discussed with the Borough Council, Natural England and other relevant parties and submitted alongside the Neighbourhood Plan for examination in due course.

12. Similarly, the Local Plan appraisal has taken account of the in-combination effects of H13 with the other Local Plan proposals in the Borough. Again, the appraisal concluded that the provisions for H13 were sustainable when considered as part of the wider development strategy. The Neighbourhood Plan proposals must

therefore have very similar effects, as they only differ in the precise distribution of 2,000 homes within or immediately adjoining the Parish boundary and make the same provision for upgrades to the necessary social infrastructure, and have to make less provision for highways infrastructure.

13. The appraisal is obliged to consider any reasonable alternatives to the proposed policies. In practice, the alternative to policies BGNB1-BGNB5 and BGNB8 is the proposed Local Plan Policy H13 spatial strategy and site allocations. The Framework fails the most fundamental principle of all in fatally undermining the essential purpose of the Green Belt to prevent the coalescence of Bowers Gifford/North Benfleet with Basildon/Pitsea beyond a point which it is possible to sensibly mitigate. Although Policy H13 requires a green wedge to be provided between new development at Pitsea and Bowers Gifford on either side of the wedge, that landscape feature cannot form an effective gap between the settlements, as acknowledged in the Local Plan landscape sensitivity evidence.

14. The Neighbourhood Plan has been prepared to respond to the proposals of the Local Plan for the area east of Basildon. The consequence of the Draft Local Plan approach to planning development in this area will be to merge the settlements of Bowers Gifford and North Benfleet with Basildon/Pitsea. In return, the local communities will see little in the way of compensating public benefits for becoming suburbs of the town. And even some of those that are planned, may fail to be delivered on time due to the many landowners.

15. This appraisal confirms that there are a number of serious, negative sustainability effects of the proposal, which cannot be left to detailed designs to resolve, as they are fundamental to the overall spatial approach taken. The Development Framework published since the Draft Local Plan has only served to make those negative effects clearer and it will be interesting to note how the Sustainability Appraisal of the final Local Plan is able to reconcile those effects.

16. In sharp contrast, the alternative strategy of the Neighbourhood Plan aims to minimise the harmful effect of losing Green Belt land, to preserve the settlements as distinct from the main town, to enable North Benfleet to become properly integrated into a new village and to deliver a recreational asset of regional value. Its **'One Village'** vision brings together all these strands to maximise the social benefits of this scale of change in the area, whilst minimising or avoiding altogether the inherent environmental costs.

1. INTRODUCTION

1.1 The purpose of this report is to provide an assessment of any significant sustainability effects resulting from the policies and proposals of the Pre-Submission version of the Bowers Gifford & North Benfleet Neighbourhood Plan, in accordance with EU Directive 2001/42 on Strategic Environmental Assessment (SEA) and with the 2004 Environmental Assessment of Plans & Programmes Regulations. Plan A below shows the designated Neighbourhood Area.

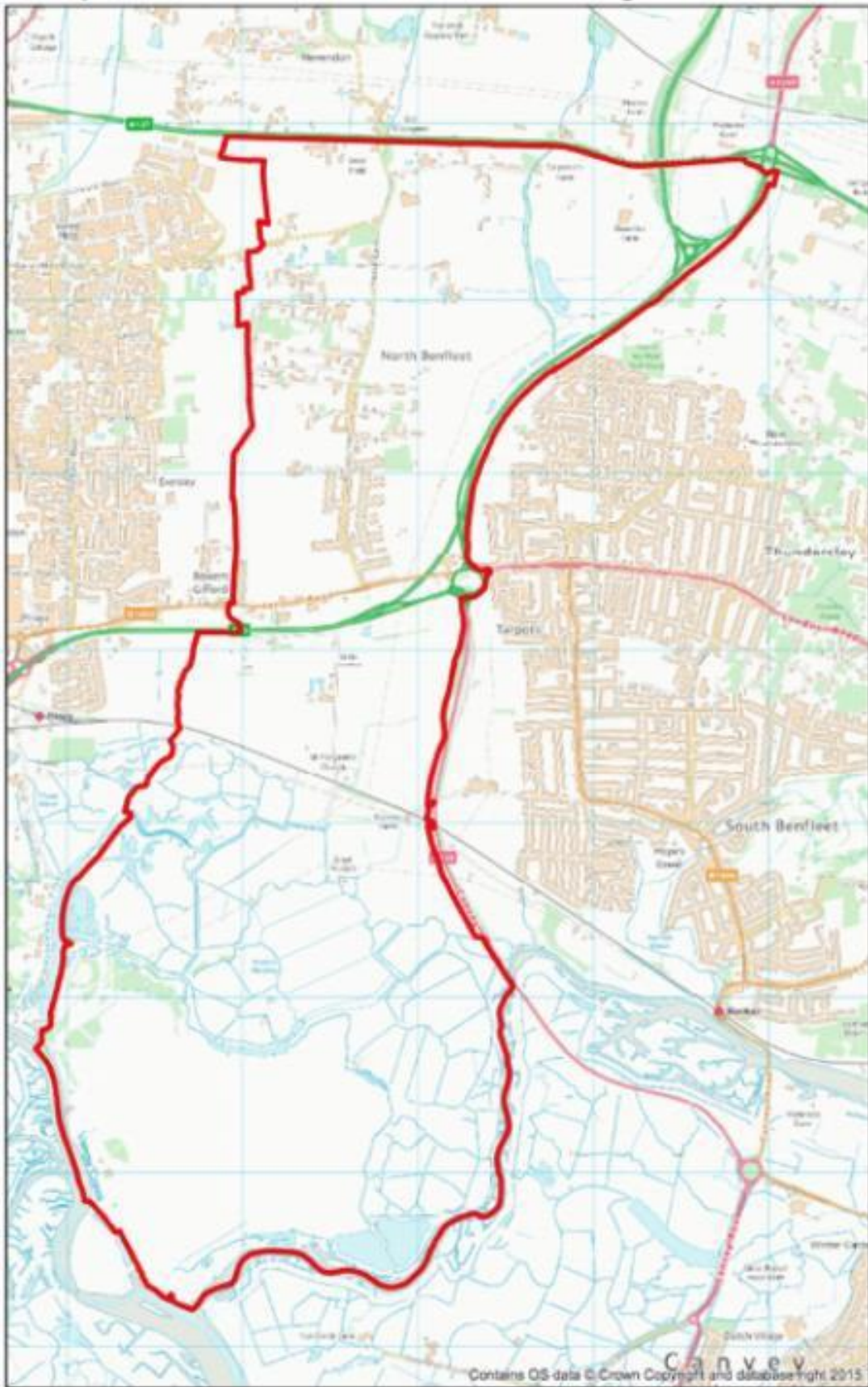
1.2 The Neighbourhood Plan has been published for consultation by the Parish Council in line with the Neighbourhood Planning Regulations 2012. From the outset, the Parish Council agreed with the local planning authority, Basildon Borough Council, that preparing a Sustainability Appraisal (incorporating a Strategic Environmental Assessment) would be an effective means by which it could be shown that the Plan contributes to the achievement of sustainable development. This is one of the basic conditions that the Neighbourhood Plan must meet, in order to be made.

1.3 In this case, it was agreed that a screening opinion (see Stage A in Table A below) was not necessary and the Parish Council moved straight to preparing and consulting the statutory bodies on the scope of the Appraisal (under the Environmental Assessment of Plans & Programmes Regulations 2004). A copy of the scoping report of July 2017) is available on the Parish Council's website and will be circulated with this Draft Sustainability Appraisal. The comments received on the scoping report are addressed in Section 5 of this report.

1.4 The Appraisal report provides an assessment of the draft policies of the Neighbourhood Plan in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts. The framework of appraisal objectives takes into account the comments made on the scoping report by the statutory consultees.

1.5 The Parish Council acknowledges that the Neighbourhood Plan alone cannot propose and implement policies requiring the release of land from the Green Belt through the redrawing of its boundaries in the Parish. This can only be done by the Local Plan in due course. However, given that the new Local Plan is having to review the Green Belt boundaries in the Parish, as part of the East of Basildon High Level Development Framework, it is reasonable for the Pre-Submission version of the Neighbourhood Plan to seek to influence the choices made by the Borough Council in the final version of the Local Plan for its examination.

1.6 Similarly, the Parish Council acknowledges that the Neighbourhood Plan can only contain policies affecting land within the designated neighbourhood area, i.e. the Parish boundary. However, the Framework extends beyond the Parish boundary and makes proposals on its immediate edge at Pitsea. The proposals of the emerging Hovefields & Honiley Neighbourhood Plan, which very much align with the Parish Council's preferred spatial strategy for the Framework, also immediately adjoin the Parish boundary. It is therefore reasonable for the Neighbourhood Plan, and this Appraisal, to consider both adjoining proposals.



Plan A: Designated Neighbourhood Area

2. BACKGROUND TO SUSTAINABILITY APPRAISAL

2.1 Through the Sustainability Appraisal are tested the potential for significant social, economic and environmental effects of the Neighbourhood Plan to ensure any harmful effects are avoided or satisfactorily mitigated. The Appraisal may also highlight where positive effects may be created and reinforced.

2.2 The methodology for the appraisal is intended to be proportionate to the task of assessing the modest development proposals of a community-led, Neighbourhood Plan. A summary of the process, as derived from the Planning Practice Guidance Flowchart of 2015 (ID 11-033), is contained in Table A below.

The Sustainability Appraisal Process (inc. Strategic Environmental Assessment)	
Screening	<p>STAGE A: This stage is undertaken by the local planning authority to determine whether the neighbourhood plan is likely to have significant environmental effects.</p> <p>If it considers there is the potential for such effects then it issues an opinion to that effects. If it does not consider there is potential for such effects, then it must consult the statutory consultees - Natural England, Historic England and the Environment Agency – before issuing its final screening opinion.</p> <p>The qualifying body may choose to undertake a Sustainability Appraisal to incorporate a Strategic Environmental Assessment or to focus solely on an Assessment, using the Basic Conditions Statement to explain how the Plan contributes to the achievement of sustainable development. The qualifying body may make this decision without obtaining a screening opinion.</p>
Scoping	<p>STAGE B: This stage sets the context of the appraisal by identifying the baseline data and establishing its scope.</p> <ol style="list-style-type: none"> 1. Identification of relevant plans, policies and programmes. Any existing requirements that need to be taken into account or incorporated into the plan are identified. 2. Review of baseline information. Data about sustainability issues is collected, together with an indication as to how this may change in the future without the plan or programme under preparation. 3. Identification of sustainability issues. The review of plans and policies, together with the baseline information are used to identify the key sustainability issues which could impact the plan. 4. Development of the Appraisal framework. The appraisal criteria used to assess the impact of the plan or programme. 5. Identification of initial plan options. Taking into account best practice initial identification of options and reasonable alternatives undertaken. 6. Consultation. On the scope and alternatives for appraisal it is necessary to consult statutory consultees.
Assessment	<p>STAGE C: This stage involves the appraisal of the any likely significant effects of the plan policies (and any reasonable alternatives) on the key sustainability issues identified.</p> <ol style="list-style-type: none"> 1. Finalisation of the Plan options and alternatives for testing 2. Testing the Plan objectives against the Appraisal Framework. The Plan Objectives are tested to understand how they relate to the framework 3. Evaluation of plan policies and alternatives. The Framework is used to assess various plan policies by identifying their potential sustainability effects and to assist in the refinement of the policies.

	<p>4. Predicting and evaluating the effects of the plan. To predict the significant effects of the plan and assist in the refinement of the policies.</p> <p>5. Consideration of ways to mitigate adverse effects and maximise beneficial effects. To ensure that all potential mitigation measures and measures for maximising beneficial effects are identified.</p> <p>6. Proposing measures to monitor the significant effects of implementing the Plan: To detail the means by which the sustainability performance of the plan can be assessed and monitored.</p> <p>This appraisal is used to feed into the development of the Plan to help understand the sustainability implications of the policies and the results are used to inform policy.</p>
Reporting	<p>STAGE D: Preparation of the Sustainability Appraisal Report</p> <ul style="list-style-type: none"> The findings of the appraisal together with how it has influenced the development of the plan are identified and set out in a draft report together with the recommendations on how to prevent, reduce, or offset any significant negative impacts arising from the plan. <p>STAGE E: Consultation – seek representations from consultation bodies and the general public</p> <ul style="list-style-type: none"> This is an ongoing process. Consultation of the draft report is taken into account and used to influence further iterations of the sustainability appraisal process. The final report is published alongside the Plan as part of the submission documentation for independent examination.
Adoption and Monitoring	<p>STAGE F: Following the making of the Plan, the effects of implementing the plan are measured and any adverse effects are responded to. The results are fed into the future plans and assessments.</p>

Table A: Sustainability Appraisal Process

2.3 The appraisal has reached Stage D, culminating in this report in readiness for its consultation (Stage E). Since the Scoping Stage B was completed, the focus has been on policy choice and formation, informed by the appraisal framework of objectives. As described below, the Parish Council has decided to widen that framework to embrace all but one of the 18 sustainability objectives in the Sustainability Appraisal of the Local Plan. It is this widened framework that has been used to test and modify the draft policies of the Pre-Submission Neighbourhood Plan and the reasonable alternatives.

3. NEIGHBOURHOOD PLAN OBJECTIVES & OTHER PLANS & PROGRAMMES

3.1 In this section the nature and scope of the various plans and programmes that form the context of the Neighbourhood Plan, as well as the Plan vision, objectives and policies is summarised.

The Neighbourhood Plan

3.2 The Neighbourhood Plan Vision is:

“One Village”

3.3 The Neighbourhood Plan has set the following key objectives:

- combine Bowers Gifford, North Benfleet and North Benfleet Hall to create a single, sustainable settlement inset from the Green Belt
- deliver a wide range of plots for new homes of all types and tenures, suited to large and small house builders and self-builders
- deliver new shops, primary school, health centre and country park with access for all
- protect important green spaces for biodiversity value and rural character
- reduce the effects of traffic on Pound Lane on safety, air quality and congestion

3.4 The Neighbourhood Plan contains the following policies:

- BGNB1 A Spatial Plan for the Parish and New Village
- BGNB2 The New Village: Hall Farm
- BGNB3 The New Village: North Benfleet
- BGNB4 The New Village: Bowers Gifford
- BGNB5 The New Village: Pound Lane
- BGNB6 Community Facilities
- BGNB7 Local Shops & Businesses
- BGNB8 The Country Park

National Planning Policy

3.5 The National Planning Policy Framework (NPPF) published by the government in 2012 is an important guide in the preparation of local plans and neighbourhood plans. The Plan must demonstrate that it has had regard to the provisions of the NPPF. The following paragraphs of the NPPF are especially relevant:

- Achieving sustainable development (§7 and §17)
- Promoting the retention and development of local services and community facilities in villages (§28)
- Protecting and exploiting opportunities for the use of sustainable transport modes (§35)
- Delivering a wide choice of high quality homes (§50)
- Planning for larger scale development (§52)

- Setting out the quality of development (§58) and using design codes where they could help deliver high quality outcomes (§59)
- Creating a shared vision with communities of the residential environment and facilities they wish to see (§69)
- Delivering the social, recreational and cultural facilities and services the community needs (§70)
- Access to high quality open spaces and opportunities for sport and recreation (§73)
- Protecting and enhancing public rights of way and access (§75)
- Promoting sustainable patterns of development in the Green Belt (§84)
- ‘Insetting’ villages in the Green Belt (§86)
- Managing flood risk (§100 etc)
- Minimising pollution and other adverse effects on the local and natural environment (§110)
- Planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (§114)
- Sustaining and enhancing the significance of heritage assets (§126)

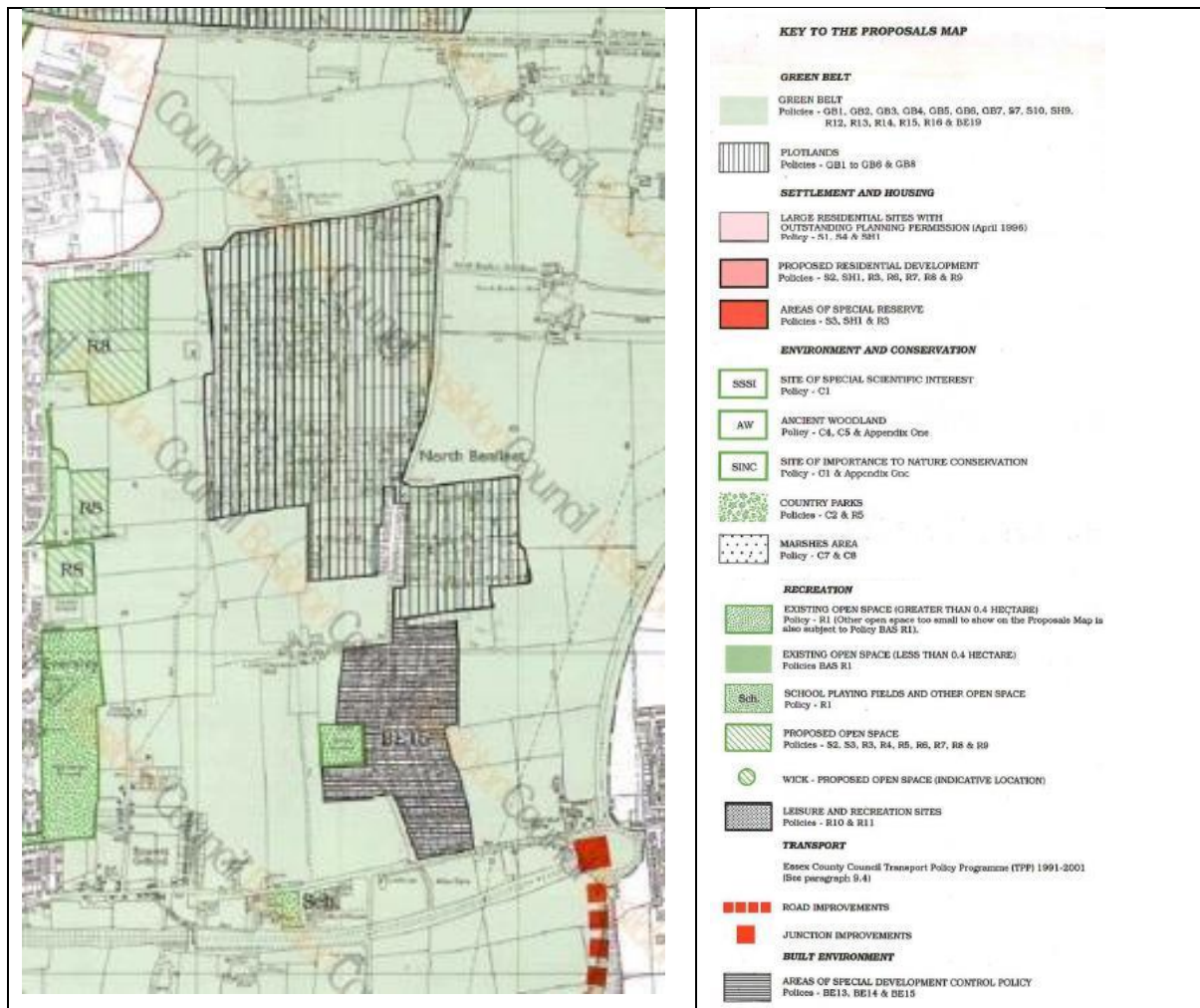
Local Planning Policy

The Basildon District Local Plan (1998)

3.6 The Basildon District Local Plan was adopted in March 1998. A number of policies have been saved, the most relevant of which to the Neighbourhood Plan are:

- BAS S2 Housing Sites
- BAS C1 Protected Areas
- GB1, GB, GB3, GB4, GB5, GB6, GB8 Green Belt (including Plotlands)
- R1 School Playing Fields and Other Open Space
- C7, C8 Marshes Area
- C1 SINC (Site of importance to nature conservation)
- BE13 Areas of Special Development Control

3.7 Generally speaking, the focus of the saved policies in the Neighbourhood Area is to protect the Green Belt and other important environmental assets from harmful development (see the Proposals Map in Plan E below).



Plan E: Basildon District Local Plan Proposals Map(Extract)

The 2016 Draft Basildon District Local Plan

3.8 The last iteration of the new Local Plan was published for consultation in 2016. It contained a number of very significant policy proposals affecting the Neighbourhood Area (and see also the extracts from the Proposals Map in Plan F below):

- GB2 – Green Belt
- GB3 – Plotlands Infill – proposing a smaller area for the North Benfleet area than at present (see extract below)
- E8B – Safeguarded Employment Zone at Burnt Mills Road
- H3 & H5 – Established G&T and Travelling Show People Sites Policy
- TS5 & TS2 – Safeguarded Areas for Transport Improvements – including a new highways junction from Pound Lane to the A127 on the Parish boundary
- H13 – Housing Allocation East of Basildon – proposing 2,000 homes in an urban extension between Basildon and Bowers Gifford/North Benfleet (see below)
- HC5 – Public Open Space – identifying two spaces in the Parish
- HE3 – Listed Buildings
- NE4 – Local Wildlife Sites

Policy H 13

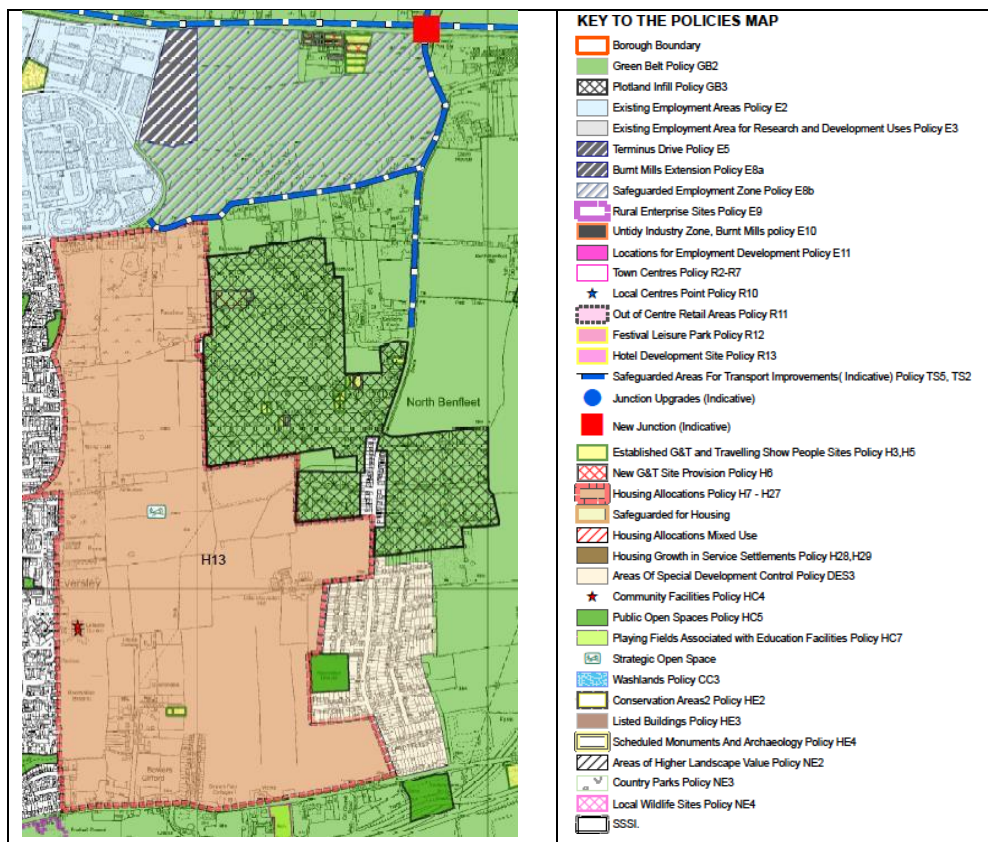
Housing Development Site - East of Basildon

1. A 152ha site is identified to the east of Basildon between Pitsea and Bowers Gifford to deliver 2,000 homes at 30dph, a nursing or residential home, a site for the accommodation of 15 pitches for gypsies and travellers as required by policy H3, and at least 75ha of open space provision, including new and replacement sports facilities and playing pitches.
2. Around 600 of the homes identified in part 1 of this policy, along with a primary school and other community facilities, will be located adjacent to Bowers Gifford. The remainder of the development requirements for this site will be delivered adjacent to Pitsea.
3. The required open space provision will be delivered as a landscape buffer between the settlements of Pitsea and Bowers Gifford. It should extend north-south through the entire site, and must be 500m wide at its frontage with the London Road, and at least 200m wide elsewhere within the site. It should be multi-functional in its purpose and accommodate formal and informal open spaces, sports pitches, opportunities for ecology, routes for active travel and areas for surface water flood risk management.
4. Development on this site must be supported by sufficient infrastructure to ensure that the development is sustainable, and does not exceed the capacity of existing infrastructure, facilities and services. In particular, development in this location is required to:
 - a. Contribute towards, alongside development at sites E8 and H14, and be phased to align with the delivery of a new grade-separated junction of the A127 at Pound Lane/Cranfield Park Road, and the provision of a new road between Pound Lane and Courtauld Road;
 - b. Be phased to align with any improvements required to accommodate growth within the drainage network or at the water recycling centre. The developers will need to engage with Anglian Water in this regard, and must work with them to deliver any capacity improvements required;
 - c. Make provision on-site for pre-school and a 2fe primary school, as specified by the Essex County Council School Place Commissioning Service, to align with additional needs arising from the site;
 - d. Make provision within the landscape buffer for the provision of open space, new and relocated sports facilities in accordance with policy HC1 and H7;
 - e. Contribute towards additional GP services within Pitsea to serve the residents of the site. Contributions should be aligned with the initial occupation of each phase of development;
 - f. Contribute towards any other local highway improvements required to support each phase of development; and
 - g. Provide active and sustainable transport routes and facilities within the site, and contribute towards improvements towards cycling and public transport provision within the vicinity of the site in order to facilitate a modal shift towards active and sustainable transport modes. The delivery of development should be phased to align with these improvements in order to ensure early occupiers of the development do not develop behaviours which rely on private vehicle travel.
5. The opportunity should be taken to investigate, and if possible make provision for decentralised energy provision, shared with development at site E8. Any provision that is secured on this site must comply with policy CC7 in order to limit impacts to residential amenity.
6. Development of this site must not cause harm to biodiversity, and in association with the landscaping proposals should seek to achieve a net gain in biodiversity. Proposals for the sites will be assessed against policy NE5 to ensure that this is the case.
7. Development on this site must not be at risk of inundation of surface water, and must not increase the risk of surface water flooding to properties elsewhere in the Critical Drainage Areas. Proposals for the sites will be assessed against policy CC4 to ensure this is the case.
8. The design and layout of development must respect the designated historic assets on the London Road. Consideration will be given to the requirements of policies in chapter 17 in order to ensure elements of the historic environment, and their setting are adequately protected from harm.
9. Development of this site should also comply with all other relevant policy requirements of this plan.
10. In order to ensure that the requirements set out in parts 1 to 9 of this policy are met, and landownership arrangements do not result in non-delivery of infrastructure and other essential requirements, or piecemeal development, a masterplan should be prepared for this site which identifies how the development and infrastructure requirements will be met in a planned and integrated fashion. This masterplan will need to be subject to viability assessment to ensure it is deliverable, and must be adopted by the Council before any part of the site is brought forward for development.

Policy GB 3

Plotland Infill

1. Limited residential development within the Plotland Infill Areas, as identified on the Policies Map, will be supported where they are compliant with all other relevant policies of this plan, and:
 - a. Where it can be demonstrated that the infill is intended to meet the need for housing arising from the plotland settlement itself, or the plot is being made available for self build via the Council's Self-Build Register;
 - b. Where the intended infill plot is not the result of subdivision of a larger plot and is located between existing dwellings on an existing road frontage, or on a corner plot. The development should not however face onto the strategic road network;
 - c. Where the intended development is appropriate in scale and setting to preserve both the character of the plotland settlement and the openness of the Green Belt. In particular, development proposals within the plotland settlements should normally be:
 - I. Structures low in height, such as bungalows and chalets;
 - II. Set within the site, with sufficient space between the dwelling and the boundary of the site to maintain an open appearance; and
 - III. Integrated into the wider landscape through the use of soft boundary treatments, such as hedges or tree lines, soft landscaping and the retention of trees.
2. Where development proposals are permitted within the Plotland Infill Areas, the Council will seek to remove the permitted development rights of the new development in order to ensure that extensions, alterations and ancillary buildings do not result in the development causing harm to the character of the plotland settlement or the openness of the Green Belt over time.
3. Non-residential development proposals will not normally be permitted within the plotland settlements.



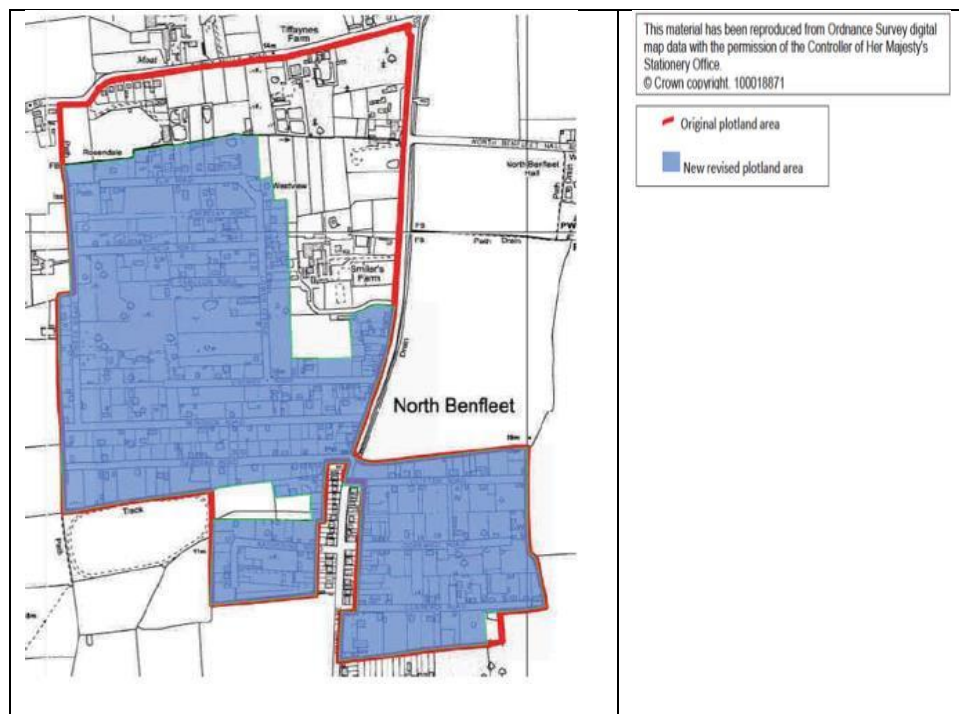
Plan F: Basildon Draft Local Plan 2016 Proposals Map(Extract)

3.9 The consequences of these policies for the Neighbourhood Area may be profound and it is the intention of the Parish Council to use its Neighbourhood Plan in the coming months to demonstrate that there is a more sustainable means of delivering housing growth and supporting infrastructure in this Area.

Plotlands Review Study 2015

3.10 The Borough Council published this study in its evidence base for the new Local Plan. The study included an assessment of the development potential of the North Benfleet Plotlands amongst all the other similar communities in the Borough.

3.11 It concludes that the current Plotlands area (shown in Plan G below) should be reduced in overall size and estimates that the infill capacity of the new area is approx. 40 homes. The Draft Local Plan does not propose to remove the Plotlands from the Green Belt.



Plan G: Plotlands Review Plan 2015

High Level Development Framework (2017)

3.12 Following the consultation on the Draft Local Plan and on Alternative Sites shortly afterwards, the Borough Council commenced the preparation of a High Level Development Framework for the 'H13' land in order to set out the overall development concept and development principles, as well as address phasing and other key delivery issues. The framework has explored and tested the vision and development policy objectives for the area and reviewed the key site promoter objectives to examine ways to accommodate these alongside policy objectives set out in the Draft Local Plan. It serves to supplement the proposed site allocations by setting development principles and a framework through which a high quality scheme can be delivered on the site.

3.13 It is also intended to demonstrate how the planning requirements set out in the Draft Local Plan can be delivered, and to determine and define the minimum extent of land that should be set aside on the Policies Map for use as the strategic open space and to review whether selection of different sites from all those available would result in a more justifiable strategic allocation than that proposed in the Draft Local Plan.

3.14 A series of development principles have been established to guide the proposals for this site, based on the emerging Local Plan policy requirements and master planning good practice guidance. They will also be used as a basis upon which to assess the development framework options, in addition to the viability testing. They are:

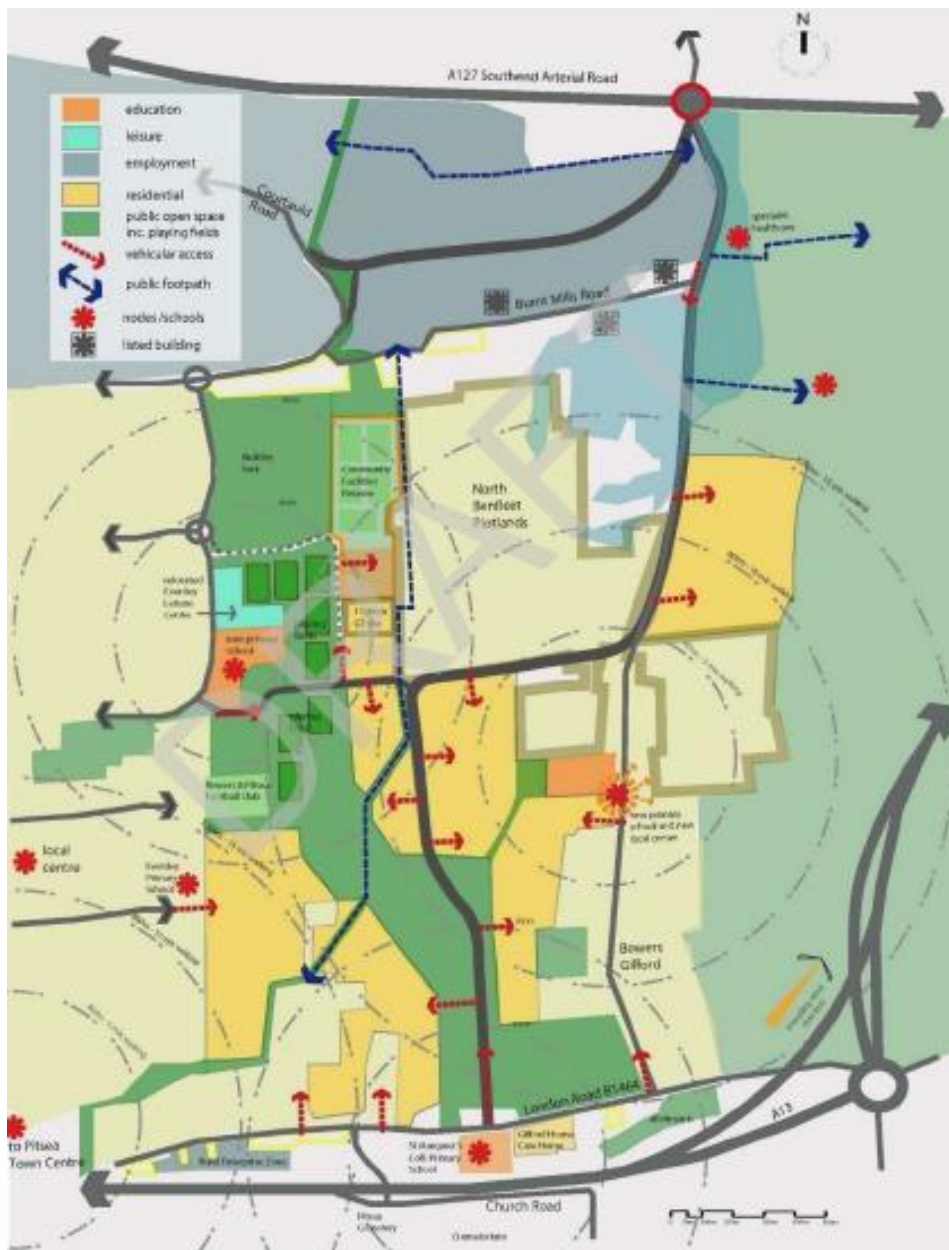
Environment	Planning	Design	Infrastructure
Topography, climate and wind direction	Policy H13 compliant to deliver a total of 2,000 homes without compromising the open space gap between Pitsea /Bowers Gifford	Prevent coalescence between settlements by maintaining visual buffer between Pitsea and Bowers Gifford	Deliver an appropriate and feasible network solution to serve both the new development and the existing community
Flooding and drainage	Allocate land to provide for specialist accommodation, including care homes, sheltered housing and travellers' pitches	Multifunctional open space network providing Activity for all	Flexibility and changeability
Framework sustainability including travelling to facilities	Policy E8 compliant to deliver a total of 49.5ha employment land	Compatibility between uses, community cohesion, colocation of community facilities	Ensure social infrastructure is there to support local community and its growth
Landscape capacity able to accommodate the level of growth	75ha of open space /strategic green gap; must be 500m wide at frontage with London Rd, at least 200m wide within the site	Set parameters to improve the quality of the built environment and make the area a secure and welcoming place	Traffic safety; high quality of streets and spaces
Other physical constraints - e.g. powerlines, land ownership	Plan for appropriate social infrastructure including local centres, primary school etc.	Connected walking and cycling routes and walkable communities	Distribution of services and utilities

3.15 The preferred framework comprises five components (see Plan H below):

- Burnt Mills Extension - plots E8a and E8b will deliver approximately 45 ha of employment land within the future Burnt Mills Extension, with a new east-west road proposed to serve the employment plots connecting the upgraded A127 junction with Courtauld Road to the west
- Pitsea Extension - the south-west part of the site area is proposed as a residential extension to Pitsea on some 35ha of land delivering approximately 1,137 dwellings, with vehicular access from existing roads including Ifracombe Avenue, Eversley Road and Woodcote Crescent, as well as from the new Distributor Road to the east
- Strategic Open Space Gap – a proposed open space gap of between 200m

and 500m will separate Bowers Gifford from Pitsea, extending from Burnt Mills Road and Courtauld Road at the north to London Road at the south end.

- Bowers Gifford Extension - residential development is proposed to the west of Bowers Gifford on some 28ha of land including Little Chalvedon site and parts of Halsbury Homes interest, delivering approximately 828 dwellings and on some 15ha of land to the east of Pound Lane on the land under option to Orbit Homes, delivering approximately 528 dwellings.
- Education and Leisure Hub – a new education and leisure hub is proposed in the area north of Trenham Avenue, with the anchors being a new Primary School and relocated Eversley Leisure Centre, positioned between the existing wooded areas to the south, and Rushley Park to the north.



Plan H: East of Basildon High Level Development Framework Concept Plan

Other Plans & Programmes

3.16 Other plans and programmes in this area include the Essex County Minerals Local Plan (adopted July 2014), the Essex County Waste Local Plan, the Essex Local Transport Plan (updated 2011) and the Basildon Borough Community Strategy 2012-2036. None are considered relevant to the appraisal of this Neighbourhood Plan. However, a full compendium of international, national and local plans and programmes relevant to the wider Basildon Borough is included in Appendix 1 of the Sustainability Appraisal of the Local Plan of January 2016.

4. LOCAL SUSTAINABILITY CHARACTERISTICS & ISSUES

4.1 A summary of the baseline information is contained in the separate Scoping Report of July 2017, which is published as part of the evidence base for the Plan. The report notes the following main sustainability characteristics:

Listed Buildings and Conservation Area	British Listed Buildings Magic Map Basildon Borough Council	There are 7 listed buildings in the Parish. The buildings of most note is the Church of All Saints (Grade II*) and the Church of St Margaret (Grade II*). The rest of the buildings are Grade II listed and these are: <ul style="list-style-type: none"> • Bradfield's Farmhouse • Cottage at Junction with Burnt Mill Road • Horseshoe Cottage • Safflers' Hall Farmhouse • Tiffayne's Farmhouse <p>There are no designated conservation areas in the Parish.</p> <p>There are no Scheduled Ancient Monuments.</p> <p>There is no Conservation Area</p>	The Parish has a relatively small number of listed buildings and therefore is not considered a highly sensitive historic landscape that any new development would need to be overly sensitive too.
Sites of Specific Scientific Interest (SSSI)	Magic Map	There are two SSSI's partially in BGNBNP area. These are found outside the area but overlap into the designated area. These are: <ul style="list-style-type: none"> • Pitsea Marsh SSSI (south west of neighbourhood area) • Holehaven Creek SSSI (south and south west) <p>RSPB Nature Reserve at Bowers Marsh.</p>	An SSSI is a conservation designation denoting a protected area in the United Kingdom. Any proposed development near to these SSSI's must be sensitive to this important designation.
Flood Risk – Fluvial and	Environment Agency	South of Bowers Gifford lies the river Thames,	New development in areas particularly

Surface Water Flooding		<p>where a number of distributaries run off of it and into the neighbourhood area. These include:</p> <ul style="list-style-type: none"> • Pitseahall Fleet • Vange Creek • Parting Gut • Fobbing Creek • East Haven Creek <p>This area has been known to flood, however the map provided by the environment agency shows that this period incorporating all of these creeks are designated 'Areas benefiting from flood defenses'.</p>	susceptible to ground and surface water flooding will need to effectively demonstrate they can mitigate the risk of flooding without having adverse effects on surrounding areas.
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4.2 The 'East Basildon High Level Development Framework of December 2017 (also published in the evidence base) provides a comprehensive and detailed description of the sustainability characteristics of the area (including land beyond the Parish boundary that forms part of the Framework at Pitsea).

4.3 The Framework makes the following key observations relating to land in the Parish:

- Relatively few heritage assets (listed buildings and archaeology)
- The presence of three coastal Special Protection Areas in proximity to the area and the potential for increased recreational pressure from large scale development that cannot be substituted by non-coastal alternative recreational areas
- No significant biodiversity interest within the area itself
- The character of the landscape is able to accommodate new development in some places but it is important to prevent coalescence, with the open views and rural break between Basildon and North Benfleet /Bowers Gifford needing to be protected to ensure that there are clear boundaries and separation between the settlements
- The area makes little or no contribution to the purposes of the Green Belt
- The area around Pound Lane lies within Flood Risk Zones 2 and 3 (adjoining North Benfleet Brook) and a wider area is subject to surface water flooding; more generally the area lies within a larger Critical Drainage Area, requiring attention at the planning application stage
- The highway network will be able to accommodate this scale of development but with major improvements to key roads and junctions, notably the A127/Pound Lane junction
- Public transport services are reasonable along London Road but with only one hourly service on Pound Lane
- The existing provision of education services meets the current needs, but a new 2FE primary school will be necessary to serve this scale of new

development and the area may be a suitable location for one of two new secondary schools needed for the Borough overall

4.4 The Framework summarises the key constraints on development thus:

- Multiple site owners
- Lack of landscape capacity in parts to accommodate the promoted quantum of urban development
- Land to the east of Pound Lane - Green Belt separation between Bowers Gifford and Thundersley /legibility of settlements
- Flood risk to areas to the east and west of the northern part of Pound Lane
- Mature landscape in the north and middle west parts of the site
- Lack of services in Bowers Gifford or the nearby Plotlands
- Vehicular access via Pound Lane and junction with A127 inadequate for the proposed development
- Lack of vehicular access to parts of the site
- The level of development growth has implications for the necessary highway infrastructure improvements
- Safeguarding of long distance views towards the Thames Estuary /Kent

4.5 The Framework summarises the key opportunities for the development thus:

- Land available for a substantial contribution towards delivering development growth to the east of Basildon
- Better definition of urban /rural interface in the context of the allocations
- Opportunities for recreational facilities in the Strategic Green Gap between Pitsea and Bowers Gifford providing a network of multifunctional open space, including those relocated from Gardiners Lane
- Opportunities for provision of a range of housing options, including percentage of affordable homes
- Provision of a range of connected walking and cycling routes, incorporating existing footpaths and open spaces
- Opportunities to improve public transport and encourage a modal shift
- Large parts of the site area are unconstrained and not designated for its environmental or landscape value
- Opportunity for better servicing and to co-locate future community facilities
- Opportunities for the Plotlands environmental enhancements and infill
- Opportunity for Basildon and Castle Point Councils to work together to address strategic cross boundary issues

4.6 This is a reasonable summary of the sustainability issues facing the Parish in the light of the need for the Borough Council's new Local Plan to allocate 2,000 homes in the area to the east of the town. The greatest challenge is how that significant housing growth can be successfully accommodated without causing major harm to the openness of the Green Belt or to the functioning of local services and the road network.

5. THE APPRAISAL FRAMEWORK

5.1 The Parish Council consulted on its proposed sustainability objectives in the Scoping Report. Whilst the statutory consultees were broadly content with those objectives, the Borough Council considered they were too narrow and that the evidence base was too light to serve this purpose.

5.2 In response, and in the light of the information published in December 2017 by the Borough Council on the direction it proposes to take to developing land east of Basildon in its new Local Plan, the Parish Council has decided to widen the objectives to match those of the Local Plan Sustainability Appraisal and to use the Local Plan evidence base (primarily the High Level Development Framework). This will enable a more consistent appraisal of the Neighbourhood Plan policies with those of the Local Plan that will affect the Parish, most notably Policy H13.

5.3 The new framework of sustainability objectives is set out in Table B below:

Sustainability Objective	Headline Measures
1. Conserving and enhancing the diverse natural and urban landscape, countryside and green spaces	<ul style="list-style-type: none"> • Will it contribute towards achieving qualitative improvement to the landscape and character of the urban and rural area? • Will it contribute towards the achievement of high-quality landscapes that reflect local distinctiveness and quality of place?
2. Protecting and enhancing the cultural heritage and local distinctiveness	<ul style="list-style-type: none"> • Will it protect and/or enhance sites, features, buildings and/or areas of historical, archaeological, landscape and cultural importance?
3. Protect, conserve and enhance the Borough's biodiversity and the habitats which support it	<ul style="list-style-type: none"> • Will it conserve or enhance SSSIs? • Will it maintain or enhance Priority Habitats and/or Species? • Will it conserve and enhance any other natural/ semi-natural habitats? • Will it conserve or enhance Local Wildlife Sites? • Will it lead to the creation of new areas of habitat? • Will it maintain and enhance woodland cover and/or management?
4. Achieve sustainable levels of prosperity and economic growth to stimulate economic regeneration	<ul style="list-style-type: none"> • Will it improve business development and enhance the competitiveness of the Borough? • Will it improve the resilience of the Borough's business and the wider economy?
5. Ensure the Borough's Town Centres are promoted as sustainable locations for living, retail, leisure and related commercial development	<ul style="list-style-type: none"> • Will it encourage uses in town centres to diversify? • Will it make land in town centres available for housing, retail, leisure and related commercial development? • Will it help encourage community spirit and civic pride?
6. Improve educational attainment and social inclusion, especially in the most deprived areas	<ul style="list-style-type: none"> • Will it help reduce poverty and social exclusion? • Will it result in capacity issues, in for example, local schools?
7. Ensure that everyone has the opportunity to live in a decent	<ul style="list-style-type: none"> • Will it increase the provision of more affordable housing for all social groups, including key workers?

home and increase affordable provision to help those in most need locally	<ul style="list-style-type: none"> • Will it increase the provision of authorised sites for gypsies & travellers and travelling showpeople? • Will it increase the net availability of new homes in the Borough?
8. Improve the health and wellbeing of the Borough's residents and reduce inequalities in health related to development and the environment	<ul style="list-style-type: none"> • Will it encourage healthier lifestyles? • Will it increase access to recreation facilities and open space? • Will it improve air, water or environmental quality?
9. Create and sustain vibrant communities that are safe and feel safe to those who live in or visit them and where crime is reduced	<ul style="list-style-type: none"> • Will it help encourage community spirit and civic pride? • Will it help the development of community level activities and organisations? • Will it contribute to increasing participation in community activities? • Will it help to improve the satisfaction people have with their neighbourhoods as places to live? • Will it improve the safety of the built or natural environment? • Will it improve road safety to road users? • Will it improve the safety of roads to other users? • Will it contribute to a high quality, well designed, living environment?
10. Regenerate and renew disadvantaged areas where people live or work in the Borough	<ul style="list-style-type: none"> • Will it improve the quality of life for people living in the Borough? • Will it improve the quality of the local housing stock? • Will it improve the local environment? • Will it improve job prospects for local people?
11. Improve accessibility to and enhance local services and facilities	<ul style="list-style-type: none"> • Will it improve the accessibility for all to key local services (schools, hospitals, health centres, leisure and sports facilities etc.)? • Will it improve accessibility for all to shopping facilities? • Will it encourage journeys to be taken by more walking, cycling and/or using of public transport?
12. Improve efficiency of land use, through the re-use of previously developed land and existing buildings, including the re-use of materials from previous buildings	<ul style="list-style-type: none"> • Will it reduce the amount of derelict, degraded and underused land in the Borough? • Will it encourage development on Previously Developed Land? • Will it minimise the loss or damage to soils from development? • Will it lead to more appropriate or efficient uses of land?
13. Minimise the risk of flooding and the detriment to public health, domestic and commercial property and the natural environment flood events can bring	<ul style="list-style-type: none"> • Will it take account of and mitigate against the potential impacts of flooding, and more storms? • Will it reduce the risk of damage to property and health from flooding and storm events? • Will it lead to development in lower flood risk areas?
14. Reduce the local contribution to climate change, by reducing emissions of greenhouse gases, improving energy efficiency of buildings and increase the use of renewable energy sources for local energy needs to	<ul style="list-style-type: none"> • Will it reduce traffic volumes? • Will it increase the proportion of journeys using alternative transport modes to private vehicles? • Will it improve the accessibility to key local services?

reduce the reliance on fossil fuels	
15. Reduce air, land and noise pollution and improve their respective quality through direct action or mitigation measures	<ul style="list-style-type: none"> • Will it reduce emissions of greenhouse gases and other air-borne pollutants? • Will it improve air quality? • Will it reduce noise levels, including those from roads and transport? • Will it maintain and enhance soil quality?
16. Improve water efficiency and achieve sustainable water resource management	<ul style="list-style-type: none"> • Will it improve river quality?
17. Adopt building and public realm designs which ensure the Borough is prepared for the impacts of climate change	<ul style="list-style-type: none"> • Has it taken account of potential effects brought about by climate change (e.g. flooding, higher temperatures, more storms)? • Will it encourage the use of Sustainable Drainage Systems? • Will it encourage green infrastructure, (such as green roofs) and the planting of trees? • Will it provide shelter in the public realm from adverse weather conditions?
18. Reduce waste generation and increase the amount of waste which is recycled or re-used.	Not relevant.
19. Reduce traffic congestion and its related pollution levels by improving travel choice and channeling development to sustainable locations	<ul style="list-style-type: none"> • Will it contribute towards the reduction of traffic volumes? • Will it contribute towards the reduction of traffic congestion? • Will it increase the proportion of journeys made using alternative transport modes to private vehicles? • Will it encourage more journeys to be made by walking, cycling or travelling by bus or train? • Will it contribute towards the reduction of distances people need to travel to access work and other lifestyle pursuits? • Will it reduce the need to travel?

Table B: Appraisal Framework of Objectives

6. APPRAISAL OF NEIGHBOURHOOD PLAN OBJECTIVES

6.1 The Neighbourhood Plan has five strategic objectives:

- combine Bowers Gifford, North Benfleet and North Benfleet Hall to create a single, sustainable settlement inset from the Green Belt
- deliver a wide range of plots for new homes of all types and tenures, suited to large and small house builders and self-builders
- deliver new shops, primary school, health centre and country park with access for all
- protect important green spaces for biodiversity value and rural character
- manage the effects of traffic on Pound Lane to improve safety, air quality and congestion

6.2 These objectives have been derived from the public consultations on the Plan and from a review of the planning context

6.3 A summary of the appraisal of the Neighbourhood Plan objectives against the sustainability objectives is provided in Table C below. A simple 'scoring' system is used to show positive (+), neutral (0) or negative (-) effects. Where the effect is uncertain or dependent on other factors, then (?) is used and an explanation is provided in the text below.

Sustainability Objectives		Neighbourhood Plan Objectives				
		1. Sustainable Settlement	2. New Homes	3. New Facilities	4. Green Spaces	5. Pound Lane Traffic
1	Conserving and enhancing the diverse natural and urban landscape, countryside and green spaces	+/-	-	-	+	+/-
		At the scale of housing growth to be planned for (together with supporting facilities and infrastructure), it is inevitable that there will be significant change to the landscape of the northern Parish and the potential for negative effects. There will be a positive effect in seeking to protect urban open spaces from development and the potential for positive effects if the new village is planned for within the landscape properly. The goal of managing traffic on Pound Lane also has the potential for positive effects if the role and nature of the road is properly considered.				
2	Protecting and enhancing the	+/-	0	0	+	+/-

	cultural heritage and local distinctiveness	There is the potential for negative heritage effects through insensitive site allocations or design policies, but such policies are not likely to meet the 'basic conditions' and so such effects will be avoided. Creating a new village, improving Pound Lane and protecting important open spaces all have the potential to increase the local distinctiveness of this part of the Parish.				
3	Protect, conserve and enhance the Borough's biodiversity and the habitats which support it	+/0	+/0	0	+	0
		There is the potential for negative biodiversity effects through insensitive site allocations or design policies, but such policies are not likely to meet the 'basic conditions' and so such effects will be avoided. Protecting open spaces, improving Pound Lane and creating a new Country Park all have the potential to increase the local distinctiveness of this part of the Parish.				
4	Achieve sustainable levels of prosperity and economic growth to stimulate economic regeneration	+/0	+/0	+/0	0	0
		There is the potential for some positive economic effects by promoting house building, by encouraging development in the new village (including new businesses) and creating new public services.				
5	Ensure the Borough's Town Centres are promoted as sustainable locations for living, retail, leisure and related commercial development	0	+	0	0	0
		There is some potential for positive effects for Basildon Town Centre through the development of new homes. The creation of new local shops will not compete with the Town Centre for most goods and services and so there is no negative effect.				
6	Improve educational attainment and social inclusion, especially in the most deprived areas	+	+	+	0	0
		The goal of creating a single, more sustainable village and delivering new public and commercial services at its heart should significantly improve community cohesion. The North Benfleet community will especially benefit from being integrated into the new village.				
7	Ensure that everyone has the opportunity to live in a decent home and increase affordable provision to help those in most need locally	+	+	0	0	0
		The goal of creating a new village through significant house building at Hall Farm and North Benfleet, in combination with similar proposals at nearby Pitsea and Hovefields & Honiley, will have a major positive effect.				
8	Improve the health and wellbeing of the Borough's residents and reduce inequalities in health related to	+	0	+	+	+
		There is the potential for a series of positive health benefits arising from a well-planned, single settlement with public and community facilities at its heart to encourage walking. Managing the effects of				

	development and the environment	traffic on Pound Lane will also encourage walking, cycling and the use of public transport. Protecting open spaces for local recreation will also encourage healthy lifestyles.				
9	Create and sustain vibrant communities that are safe and feel safe to those who live in or visit them and where crime is reduced	+	+	+	+	+
		All five objectives are intended to create and sustain a new vibrant community. The new village will blend old and new residential areas and new homes will widen the profile of the local population. The new infrastructure and improvements to Pound Lane will improve safety and the threat of crime. The new shops and protected open spaces will also contribute to creating a sustainable community.				
10	Regenerate and renew disadvantaged areas where people live or work in the Borough	0	0	0	0	0
		The Parish communities are not disadvantaged areas. The objectives will not hinder the regeneration of those parts of the Borough that are disadvantaged.				
11	Improve accessibility to and enhance local services and facilities	+	+	+	+	+
		All five objectives will work together to improve the accessibility, range and quality of local services and facilities. The new village will provide an efficient spatial organisation of land uses, the new housing will deliver the financial resources to invest in the new infrastructure and improvements to Pound Lane will encourage walking and cycling. There is also the potential for a significant improvement in local bus services if new development is concentrated in specific locations around Pound Lane. Protecting open spaces will ensure that all of the community will be able to walk to them for recreation purposes.				
12	Improve efficiency of land use, through the re-use of previously developed land and existing buildings, including the re-use of materials from previous buildings	+	+	0	0	0
		The new village plan integrates North Benfleet through the efficient intensification of developable land there. There is little in the way of brownfield land in the Parish, but the objectives will not undermine using such land elsewhere in the Borough.				
13	Minimise the risk of flooding and the detriment to public health, domestic and commercial property and the natural environment flood events can bring	?	?	?	0	0
		There are parts of the new village that are subject to flooding. There is therefore the potential for negative effects but this is unlikely to be realised with the implementation of national and local policy on flooding resulting in the Neighbourhood Plan policies avoiding development in flood risk areas.				

14	Reduce the local contribution to climate change, by reducing emissions of greenhouse gases, improving energy efficiency of buildings and increase the use of renewable energy sources for local energy needs to reduce the reliance on fossil fuels	+	-	+	0	+
		The new village objective will organise land uses efficiently to encourage non-car use but the housing objective will mean many more car trips are made overall, hence the likely negative effect. The objective of improving local services and Pound Lane should also go some way to encouraging non-car trips for those purposes.				
15	Reduce air, land and noise pollution and improve their respective quality through direct action or mitigation measures	+	-	+	0	+
		The new village objective will organise land uses efficiently to encourage non-car use but the housing objective will mean many more car trips are made overall, hence the likely negative air and noise pollution effects. The objective of improving local services and Pound Lane should go some way to encouraging non-car trips for those purposes.				
16	Improve water efficiency and achieve sustainable water resource management	+	+	0	0	0
		The new village plan and new homes should enable investment in local drainage infrastructure to improve its efficiency.				
17	Adopt building and public realm designs which ensure the Borough is prepared for the impacts of climate change	+	+	+	0	0
		The new village objective will create a new public realm, supported by the housing and community facility objectives. The climate change effects will be managed through Local Plan policies, with nothing in these objectives that need hinder that goal.				
18	Reduce waste generation and increase the amount of waste which is recycled or reused	Not relevant to this Neighbourhood Plan				
19	Reduce traffic congestion and its related pollution levels by improving travel choice and channelling development to sustainable locations	+	-	+	0	+
		The new village objective will organise land uses efficiently to encourage non-car use but the housing objective will mean many more car trips are made overall, hence the likely negative congestion effects. The objective of improving local services and Pound Lane should go some way to encouraging non-car trips to manage the effects of congestion.				

Table C: Appraisal of Neighbourhood Plan Objectives

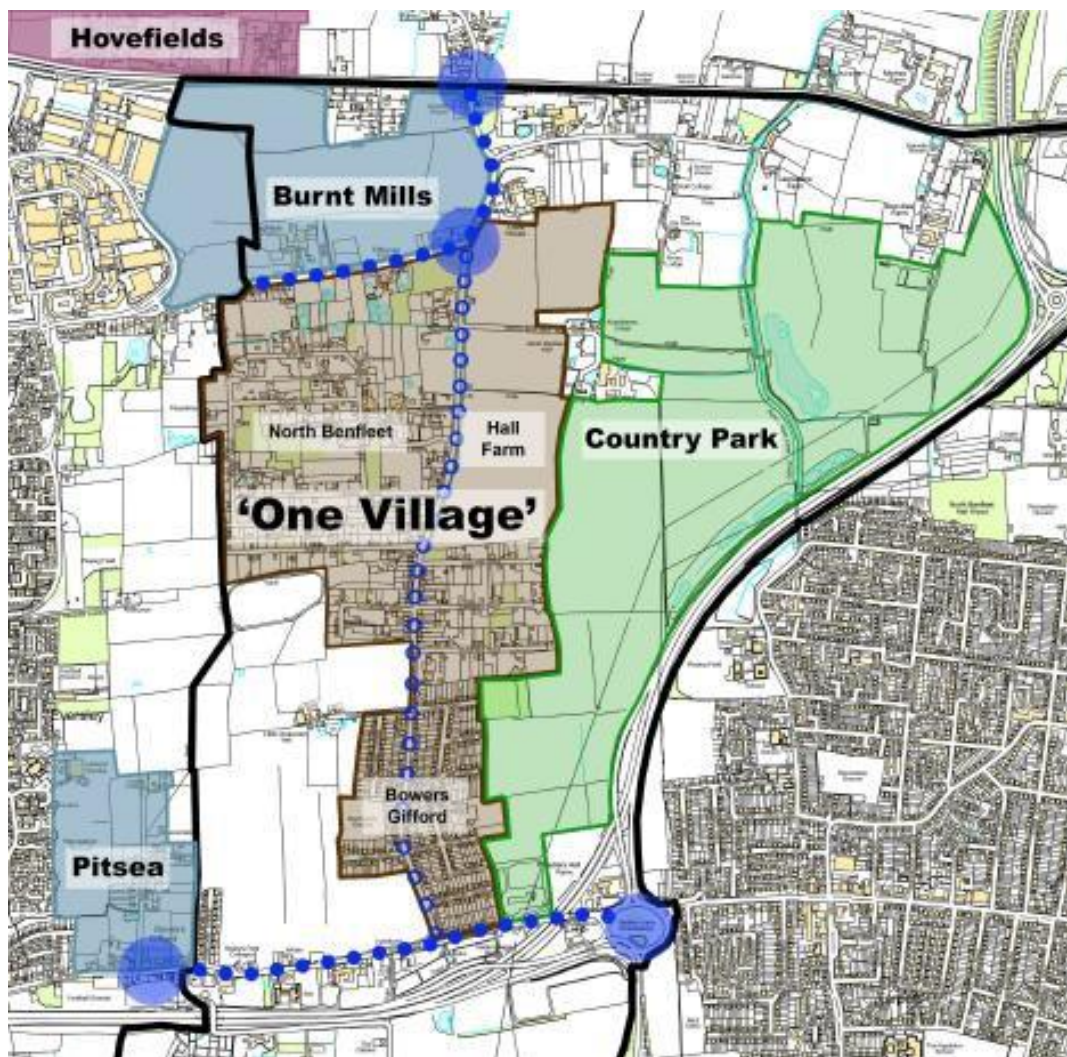
6.4 In general terms, there is a strong, positive relationship between the Neighbourhood Plan objectives and those of the Appraisal. There is the potential for negative effects in some cases, which is inevitable with the scale of housing growth, but this must be planned for to keep in general conformity with the new Local Plan, which itself must have regard to national planning policy on meeting housing needs.

6.5 Importantly, the comparison shows the importance of securing the right spatial plan for the growth that is required within the Parish boundary and on its edges. That plan will enable the positive effects of these objectives to be accentuated and the negative effects to be moderated and mitigated. This becomes more apparent when comparing the preferred approach of the Neighbourhood Plan with the alternative approach of the Local Plan Development Framework.

7. APPRAISAL OF NEIGHBOURHOOD PLAN POLICIES

7.1 The Neighbourhood Plan contains eight policies in pursuit of its strategic objectives. They are:

- BGNB1 A Spatial Plan for the Parish and New Village (see Plan J for the Concept Plan)
- BGNB2 The New Village: Hall Farm (approx. 800 homes, commercial services and community facilities)
- BGNB3 The New Village: North Benfleet (300 – 400 homes)
- BGNB4 The New Village: Bowers Gifford (50 new homes)
- BGNB5 The New Village: Pound Lane (improvements and traffic management measures)
- BGNB6 Community Facilities (protection from unnecessary loss)
- BGNB7 Local Shops & Businesses (protection from unnecessary loss)
- BGNB8 Country Park (new 83 Ha park)



Plan J: 'New Village' Concept Plan

7.2 The most fundamental differences between this concept and range of policies and those of the Local Plan Policy H13 are:

- The exclusion of all development land within the Parish boundary in the Green Belt between Bowers Gifford/North Benfleet and Basildon
- The development of a smaller land area at Pitsea to be accessed through the existing road network
- The allocation of development land at Hall Farm
- The greater intensification of housing in North Benfleet
- The exclusion of the new distributor road east of North Benfleet and the realignment of Pound Lane through North Benfleet
- The upgrading of Pound Lane between the new A127 junction and North Benfleet to accommodate new housing at Hall Farm and North Benfleet and to serve the new employment land at Burnt Mills
- The downgrading (with the lowering of its speed limit to 20 mph) and redesign of Pound Lane through the remainder of the new village to London Road to discourage through-traffic between the A127 and London Road/A13 and to create a pedestrian-friendly environment and a new cycle lane and bus service infrastructure
- The creation of an 83 Ha Country Park in the Green Belt between the new village and Thundersley to its east

7.3 The main outcome of these differences will be the creation of a new, distinct, sustainable village set within the Green Belt with little or no visual coalescence between it and Basildon. Although not matters for the appraisal, it is also considered the concept has greater confidence in being delivered as it relies on fewer land interests and a lower upfront and ongoing financial investment in highways infrastructure than the H13 concept. When taken together with the proposals immediately outside the Parish boundary, the concept will deliver the same quantum of housing development and social infrastructure as that proposed by H13.

7.4 In Table D below these policies are assessed against each of the sustainability objectives. Again, the information sets out the potential for positive (+), neutral (0), negative (-) or uncertain (?) effects.

Neighbourhood Plan Policies									
		BGNB1: Spatial Plan	BGNB2: Hall Farm	BGNB3: North Benfleet	BGNB4: Bowers Gifford	BGNB5: Pound Lane	BGNB6: Community Facilities	BGNB7: Shops & Businesses	BGNB8: Country Park
1	Conserving and enhancing the diverse natural and urban landscape, countryside and green spaces	+	-	+	0	0	0	0	+
		<p>The combination of policies BGNB1-BGNB5 and BGNB8 will preserve the essential openness of the open countryside in the Green Belt between Bowers Gifford and Pitsea. The Hall Farm proposal is confined to that area on the western slope of the ridgeline to the edge of North Benfleet only. It does not appear above the ridgeline in views from the east and it will not encroach at all on the eastern slopes as all of that land will form part of the Country Park. The essential openness of the open countryside between North Benfleet and Thundersley will therefore be preserved. North Benfleet can accommodate homes using the established plot dimensions and an improved road network and by extending the network within the current defined boundary. Given the scale and distribution of existing development across the defined area, the additional development, although doubling the number of homes, will make no material difference to the effects of the settlement on the surrounding landscape and its inseting from the Green Belt will not compromise the essential character of the Green Belt, which in any event has been assessed as having no/little purpose in this area. The Borough Council evidence base, including the Development Framework, contains a number of errors in assumptions relating to the Hall Farm/Country Park land that presents a misleading appraisal in respect of their Green Belt and landscape effects.</p> <p>In overall terms, this strategy offers a significantly more effective way of stitching new development into the existing settlement fabric and of minimizing the impacts on the precious landscape gaps (and therefore Green Belt) between the settlements and their larger neighbours. The avoidance of routing a major new road through the gap between the new village and Basildon will also mean that the urbanising effects of development will be far fewer.</p> <p>However, the Hall Farm development will have some negative landscape effects given it is presently green field land. The two small London Road sites are gaps in a long frontage between the road and A13 and so will be neutral in their effects. The improvements to North Benfleet will enhance its appearance in the landscape and therefore have positive effects. The Country Park will have significant positive effects in maintaining and enhancing landscape character.</p>							
2	Protecting and enhancing the cultural heritage and local distinctiveness	+	0	0	0	0	+	0	+

		Although North Benfleet has some cultural heritage value it is not a designated heritage asset and its value has been undermined by unenforced development and unintended consequences of Green Belt development management policy. The local community is the best judge of this value in balancing it against other policy objectives. The policies that will lead to North Benfleet being a part of a larger, sustainable village, can be delivered without undermining this value (through the use of a Neighbourhood Development Order in due course). The All Saints Orthodox Church is Grade II* listed and there is a Grade II listed cottage on Burnt Mills Road, both of which lie in close proximity to the Hall Farm site but there is sufficient developable land to avoid significant harm to the setting of either of these heritage assets (as the policy requires).							
3	Protect, conserve and enhance the Borough's biodiversity and the habitats which support it	+	+	+	0	0	0	0	+
		The scale of development in the Parish is lower than that proposed in Policy H13 and the majority of the land lies further away from the Ramsar/SPA than H13 and is more than 1km from the SSSI. The potential for negative effects is therefore less than H13. The proposed Country Park and improvements to North Benfleet will also create opportunities for significant biodiversity gain through new wildlife areas and informal natural green space and street tree planting and SUDS respectively.							
4	Achieve sustainable levels of prosperity and economic growth to stimulate economic regeneration	0	+	0	0	0	+	+	+
		Policies BGNB2-4 will deliver a significant number of dwellings. These new households will require a significant number of new local facilities to meet increasing demand, creating employment opportunities at a new pre-school and primary school, potentially a new secondary school, additional GP services and new local shops. This is provided for at Hall Farm in a central location for the new village. The Country Park will also create new land management and visitor-related jobs. The combination of policies will therefore have significant positive employment effects.							
5	Ensure the Borough's Town Centres are promoted as sustainable locations for living, retail, leisure and related commercial development	+	+	+	+	0	0	0	0
		The new housing development will provide a significant amount of residential development, increasing demand for town centre uses, goods and services. The policies also include essential community facilities and services, but they will be local in nature and scale and will not compete with the town centre uses. The policies therefore have a positive effect.							
6	Improve educational attainment and social inclusion, especially in the most deprived areas	+	+	0	0	0	0	0	+
		The new housing development will increase the need for early years, primary and secondary school places in the area. Policy BGNB2 makes provision for the necessary land to deliver this							

		new capacity and so will have positive effects. The Country Park will include local outdoor recreation facilities. The central location of the early years and primary school provision in the new village will improve community cohesion between the existing and new communities.							
7	Ensure that everyone has the opportunity to live in a decent home and increase affordable provision to help those in most need locally	+	+	+	+	0	0	0	0
		Policy BGNB1 will deliver approx. 1,300 homes alongside the Local Plan proposals for a nursing/residential home and a traveller site. This will have significant positive housing effects, with the different parts of the new village offering a wide variety of housing types and tenures.							
8	Improve the health and wellbeing of the Borough's residents and reduce inequalities in health related to development and the environment	0	+	0	0	+	+	+	+
		Aside from delivering new social infrastructure at Hall Farm, the policies will provide major recreational asset in the form of an 83Ha Country Park to improve the health and well-being of the residents of the Borough and neighbouring Castle Point. Policies BGNB6 and BGNB7 will also ensure that most residents can access existing shops, businesses and services in the new village by walking with traffic management improvements on Pound Lane. Together, the policies will have significant positive health and well-being effects.							
9	Create and sustain vibrant communities that are safe and feel safe to those who live in or visit them and where crime is reduced	+	+	+	0	+	0	0	0
		Policies BGNB1 and BGNB3 are expressly intended to address the social problems of North Benfleet by tackling its poor infrastructure, its unauthorised, low quality development and its poor integration with neighbouring Bowers Gifford. This will transform the area as part of the new village and will therefore have a very positive effect. This will be bolstered by the creation of new public realm and village services in the centre of the new village at Hall Farm.							
10	Regenerate and renew disadvantaged areas where people live or work in the Borough	+	0	+	0	0	0	0	0
		The spatial strategy of Policy BGNB1 and specific proposals of Policy BGNB3 will address the social problems of North Benfleet by tackling its poor infrastructure, its unauthorised, low quality development and its poor integration with its neighbouring village. This will transform the area as part of the new village and will therefore have significant positive effects.							
11	Improve accessibility to and enhance local services and facilities	+	+	0	0	+	+	+	+
		The policies will deliver all the necessary new social infrastructure at the heart of the new village. In addition, the Country Park will provide a major recreational asset for the residents of the Parish, Borough and neighbouring Castle Point. Pound Lane will be improved as a route for walking, cycling							

		and bus services and will continue to provide local shops and businesses along its spine. Together the policies will have significant positive effects.							
12	Improve efficiency of land use, through the re-use of previously developed land and existing buildings, including the re-use of materials from previous buildings	+ - + + 0 0 0 0							
		Policy BGNB2 relies on green field land to deliver new homes and will therefore have a negative effect in this respect. But North Benfleet offers the opportunity to deliver many new homes by making more efficient use of vacant and under-utilised plots. And gaps in the developed frontage of London Road will also be a more efficient use of this land as part of the new village. Those policies will therefore have positive effects.							
13	Minimise the risk of flooding and the detriment to public health, domestic and commercial property and the natural environment flood events can bring	-? 0 -? 0 0 0 0 0							
		Part of the land in the new village (at North Benfleet and Hall Farm) currently lies within flood zone 2. At Hall Farm, there is sufficient land in the developable area to deliver the proposed uses without incursion into the flood risk areas (which will be incorporated into the public realm along the Pound Lane frontage). At North Benfleet, the proposals to upgrade and better manage the local utilities infrastructure, including culverts, will resolve some of the current problems. At present it is uncertain if this will result in a redefined flood zone boundary, hence Policy BGNB3 identifies a range of housing quantum. This matter will need to be resolved at the submission stage (through the sequential and exception tests if Policy BGNB3 is to support the development of land in a flood zone). There is therefore the potential for negative flood risk effects at North Benfleet.							
14	Reduce the local contribution to climate change, by reducing emissions of greenhouse gases, improving energy efficiency of buildings and increase the use of renewable energy sources for local energy needs to reduce the reliance on fossil fuels	+? +? +? +? 0 0 0 0							
		The close proximity of this location to existing and proposed local community services and facilities and improved sustainable transport infrastructure will play a key role in reducing greenhouse gas emissions emitted from private cars. The land is within easy walking distance of a good range of planned and existing local facilities and services. The opportunity should be taken to investigate, and if possible make provision for decentralized energy provision on Hall Farm (that may extend to other parts of the new village). Any such provision must comply with Local Plan Policy CC7 in order to limit impacts to residential amenity. Therefore, overall, the policies are likely to have a positive effect with some uncertainty due to the lack of information about capacity and the potential to expand services and facilities if required.							
15	Reduce air, land and noise pollution and improve their respective quality through direct action or mitigation measures	+/- +/- +/- +/- + + + 0							
		The close proximity of this location to existing and proposed local community services and facilities and improved sustainable transport infrastructure will play a key role in reducing air and noise pollution. The land is within easy walking distance of a good range of planned and existing local facilities and services. The proposed central location of the							

		majority of these services within the new village (and the traffic management measures along Pound Lane to discourage through traffic) will encourage walking and cycling. There will therefore be positive effects to partially offset the overall increase in traffic and noise from the housing development.							
16	Improve water efficiency and achieve sustainable water resource management	0	0	0	0	0	0	0	0
		Local Plan policy requires that development will need to be phased to align with any improvements required to accommodate growth within the drainage network or at the nearby Water Recycling Centre, and that developers will need to engage with Anglian Water in this regard, and must work with them to deliver any capacity improvements required. This should successfully mitigate the potential for negative effects of policies BGNB1 – BGNB4.							
17	Adopt building and public realm designs which ensure the Borough is prepared for the impacts of climate change	+?	+?	+?	0	0	0	0	0
		The policies BGNB1 – BGNB3 create an opportunity to resolve current flood risk management problems at Hall Farm and at North Benfleet. The Hall Farm scheme will create a new public realm at the heart of the new village to integrate its three component residential areas. North Benfleet will also benefit from new public realm and green infrastructure to help adapt the area to the effects of climate change. There is therefore the potential for positive effects.							
18	Reduce waste generation and increase the amount of waste which is recycled or reused	No relevant effects.							
19	Reduce traffic congestion and its related pollution levels by improving travel choice and channelling development to sustainable locations	+	+	+	+	+	+	+	+
		All of the policies will have positive effects as the new village centred around a traffic-managed Pound Lane and new local services will increase the attractiveness of walking and cycling, bolstered by new bus services. The housing development (along with development at Pitsea and at Hovefields & Honiley) will enable the financing of the A127/Pound Lane junction improvement. But the new distributor road proposed for H13 through the strategic gap between the new village and Pitsea will not be required. The retention of existing shops, businesses and community facilities in the village will continue to promote the choice of walking for customers, employees and visitors.							

Table D: Appraisal of Proposed Neighbourhood Plan Policies

7.3 The appraisal indicates that the policies will have a number of positive sustainability effects, especially in relation to those appraisal objectives promoting social and economic benefits. The negative landscape and pollution effects are inevitable with such a step-change in the quantum of development that must be planned for. The challenge faced and addressed by the policies, taken as a whole, is how to arrange new development within the existing settlement pattern so that the essential, distinct character of those settlements, and their essential Green Belt setting, is maintained.

7.4 Although the Neighbourhood Plan relies upon land adjoining its boundary at Pitsea and Hovefields & Honiley to deliver the full 2,000 homes required by the new Local Plan for east of Basildon, its contribution of 1,300 within the Parish Boundary remains significant. Together, the locations will deliver sufficient housing development to deliver the supporting highways, public transport and social infrastructure, but with the bonus of a genuine sub-regional green infrastructure investment in the form of the Country Park.

7.5 At present, the need for a new secondary school in the Parish area (or in close proximity to it) is uncertain. The Development Framework indicated that one may be necessary and land near or part of Hall Farm may be suited to this use. The Framework has not yet been subject to sustainability appraisal, so nor are the effects of that proposal known. In which case, this appraisal has not taken this proposal into account, so that a consistent comparison is made. However, locating a new secondary school on the edge of the new village (albeit on green field land in the Green Belt) is not incompatible with the Neighbourhood Plan strategy and may be done in such a way as to avoid or successfully mitigate its sustainability effects. The final appraisal will consider this matter further if and when necessary at the submission stage.

7.6 This appraisal has taken into account the appraisal of the Local Plan Policy H13 in terms of its local biodiversity effects and effects on the wider series of European Nature Sites in respect of the Habitats Regulations. As the Neighbourhood Plan policies are of a nature and scale that fall within the parameters set by that appraisal, these effects will be no greater than those of H13, and may be slightly fewer. If necessary, a separate screening for these effects under the Habitat Regulations will be carried out and discussed with the Borough Council, Natural England and other relevant parties and submitted alongside the Neighbourhood Plan for examination in due course.

7.7 Similarly, the Local Plan appraisal has taken account of the in-combination effects of H13 with the other Local Plan proposals in the Borough. Again, the appraisal concluded that the provisions for H13 were sustainable when considered as part of the wider development strategy. The Neighbourhood Plan proposals must therefore have very similar effects, as they only differ in the precise distribution of 2,000 homes within or immediately adjoining the Parish boundary and make the same provision for upgrades to the necessary social infrastructure, and have to make less provision for highways infrastructure.

8. APPRAISAL OF REASONABLE POLICY ALTERNATIVES

8.1 The appraisal is obliged to consider any reasonable alternatives to the proposed policies. In practice, the alternative to policies BGNB1-BGNB5 and BGNB8 is the proposed Local Plan Policy H13 spatial strategy and site allocations (as summarised in the Framework and shown in Plan H above).

Borough Council High Level Development Framework Alternative to the Neighbourhood Plan

8.2 This document contains the following key proposals, although as noted in Section 7, they have not yet been subject to the sustainability appraisal of the Local Plan:

- Burnt Mills Extension - plots E8a and E8b will deliver approximately 45 ha of employment land within the future Burnt Mills Extension, with a new east-west road proposed to serve the employment plots connecting the upgraded A127 junction with Courtauld Road to the west
- Pitsea Extension - the south-west part of the site area is proposed as a residential extension to Pitsea on some 35ha of land delivering approximately 1,137 dwellings, with vehicular access from existing roads including Ilfracombe Avenue, Eversley Road and Woodcote Crescent, as well as from the new Distributor Road to the east
- Strategic Open Space Gap – a proposed open space gap of between 200m and 500m will separate Bowers Gifford from Pitsea, extending from Burnt Mills Road and Courtauld Road at the north to London Road at the south end.
- Bowers Gifford Extension - residential development is proposed to the west of Bowers Gifford on some 28ha of land including Little Chalvedon site and parts of Halsbury Homes interest, delivering approximately 828 dwellings and on some 15ha of land to the east of Pound Lane on the land under option to Orbit Homes, delivering approximately 528 dwellings.
- Education and Leisure Hub – a new education and leisure hub is proposed in the area north of Trenham Avenue, with the anchors being a new Primary School and relocated Eversley Leisure Centre, positioned between the existing wooded areas to the south, and Rushley Park to the north.

8.3 The preferred development scenario proposed in the Framework is a response to a set of core planning, design and infrastructure principles (shown in Section 3) that are consistent with five environmental objectives. At this stage in the appraisal process, this set of core principles enables an assessment of this reasonable alternative to the Neighbourhood Plan.

8.4 The Framework fails the most fundamental principle of all in fatally undermining the essential purpose of the Green Belt to prevent the coalescence of Bowers Gifford/North Benfleet with Basildon/Pitsea beyond a point which it is possible to sensibly mitigate. Although Policy H13 requires a green wedge to be provided between new development at Pitsea and Bowers Gifford on either side of the wedge, that landscape feature cannot form an effective gap between the settlements, as acknowledged in the Local Plan landscape sensitivity evidence.

8.5 The Framework has not solved this problem, especially as it seems clear that a new link road joining the London Road with Burnt Mills Road will need to be located

within that wedge. The new link road is required to provide access to the developments proposed east of Pitsea and west of Bowers Gifford as the existing Pound Lane cannot provide the necessary capacity (but this is not required by the Neighbourhood Plan strategy, which has a very different conceptual approach to highways planning and place-making). The link road will be an urbanising feature, along with other urban features within the wedge – formal sports facilities and a new school – that will compromise the environmental quality of much of the remaining gap. It also means that the 75Ha area for new publicly accessible open space (as opposed to land that is already accessible adjoining Pitsea) is less than may otherwise have been provided, and will be in the form of an urban park, not countryside. At its widest, the gap will be 500m but for much of its length from Burnt Mills Road to London Road, it will be narrower, tapering to only 200m at its narrowest point.

8.6 The key evidence for the H13 approach is the Green Belt Review, the Highways Topic Paper and the Outline Landscape Appraisal (all of December 2015). The Green Belt Review is especially important but flawed in its analysis of the contribution the land currently makes to the purposes of the Green Belt. However, even with its conclusions that the land makes no contribution to any of those purposes, it still concludes that, “whilst a swathe of public open space would be provided ... to act as a landscape buffer maintaining the separation between Pitsea and Bowers Gifford, the remaining Green Belt sub-area would no longer contribute to preventing two neighbouring towns merging ... the new sub-area would be dominated by development and therefore would not assist in safeguarding the countryside from encroachment...”.

8.7 The Outline Landscape Appraisal followed on from character and sensitivity assessments of 2013/14. The assessment of Site 27 east of Basildon covers two distinct landscape areas previously assessed separately, as Areas 51a and 51b, which are divided by the prominent ridgeline between Bowers Gifford and Thundersley. These separate areas have markedly differing landscape sensitivity and capacity, as shown in the findings of the previous assessment, as was also noted in terms of their Green Belt function. The conclusions to the Outline Landscape Appraisal makes this point and states that the assessment refers to the more sensitive eastern portion of the site but this is fundamentally an inaccurate interpretation of the findings. Even so, Policy H13 is unusual (compared to other policy proposals) as it almost entirely contradicts the Appraisal findings.

8.8 Aside from its immediate effects on air quality and tranquility in the proposed open space, the new link road will generate additional traffic wanting to find an alternative to the current means of connecting between the A127 and A13. The present limitations of Pound Lane and its junctions at and between those two roads no doubt dissuade many such journeys. The new link road is likely to release this latent demand, making the road much busier than just managing the additional traffic generated by the new housing developments proposed in H13. With congestion at its key junctions inevitable, a number of journeys are likely to be diverted onto Pound Lane, with significant consequences for the environmental quality of the present settlements.

8.9 The Sustainability Appraisal of the H13 proposal and of its reasonable alternatives carries forward similar flaws elsewhere in the evidence base. The appraisal of H13 notes that it, “scored significant adverse effects against SA objectives ... the landscape sensitivity of the area is considered to be too high to accommodate the

number of homes proposed'. However, although this acknowledges the principle inability of the landscape (and Green Belt) to accommodate this level of development, it concluded that "most of these adverse effects are uncertain until the exact design, form and layout of new housing proposals are known". Hence, the negative effects of the policy are underplayed or equivocated.

8.10 Unfortunately, the Appraisal did not take the opportunity to assess anything other than the option of delivering 2,000 solely to the east of Bowers Gifford. This option was never 'reasonable' to assess, as the land had never been made available for that purpose. Unsurprisingly, the Appraisal concluded that the alternative offered no more sustainable an option than H13.

8.11 The later Development Framework has only further highlighted the uneven consideration of the two alternative spatial concepts. It contained a critique of the what it understood to be the Neighbourhood Plan proposals (in its Addendum). However, its understanding of the proposals was inadequate for the purpose of a serious analysis and its conclusions therefore were flawed. It is not credible evidence to consider in this appraisal.

8.12 In summary, the H13 alternative has fewer comparative, positive effects and more comparative, negative effects than the Neighbourhood Plan proposal in the following key areas:

- 1. Conserving and enhancing the diverse natural and urban landscape, countryside and green spaces (significantly more negative effects in allowing for the coalescence of Bowers Gifford/North Benfleet with Basildon)
- 9. Create and sustain vibrant communities that are safe and feel safe to those who live in or visit them and where crime is reduced (fewer positive effects in reinforcing the social connectivity between North Benfleet and the rest of the Parish and even negative if the redirected Pound Lane severs the two communities)
- 15. Reduce air, land and noise pollution and improve their respective quality through direct action or mitigation measures (significant negative effects in the realigning of Pound Lane and the new distributor road connecting the A127 with the A13 with the increases in air and noise pollution in the narrow gap between the settlements)
- 19. Reduce traffic congestion and its related pollution levels by improving travel choice and channeling development to sustainable locations (as with 15 above, significant negative effects by creating congestion generated by traffic using the new roads from outside the area, with consequences for the successful delivery of a better pedestrian-friendly environmental and public transport improvements)

8.13 Across all other sustainability objectives, there is no discernible difference between the two alternatives and therefore their positive and negative effects will be broadly the same.

9. SUMMARY OF APPRAISAL

9.1 The Neighbourhood Plan has been prepared to respond to the proposals of the Local Plan for the area east of Basildon. The consequence of the Basildon Borough's Draft Local Plan approach to planning development in this area will be to merge the settlements of Bowers Gifford and North Benfleet with Basildon/Pitsea. In return, the local communities will see little in the way of compensating public benefits for becoming suburbs of the town. And even some of those that are planned, may fail to be delivered on time due to the many landowners.

9.2 This appraisal confirms that there are a number of serious, negative sustainability effects of the proposal, which cannot be left to detailed designs to resolve, as they are fundamental to the overall spatial approach taken. Basildon Borough Council's Development Framework published since the Draft Local Plan has only served to make those negative effects clearer and it will be interesting to note how the Sustainability Appraisal of the final Local Plan is able to reconcile those effects.

9.3 In sharp contrast, the alternative strategy of the Neighbourhood Plan aims to minimise the harmful effect of losing Green Belt land, to preserve the settlements as distinct from the main town, to enable North Benfleet to become properly integrated into a new village and to deliver a recreational asset of regional value. Its 'One Village' vision brings together all these strands to maximise the social benefits of this scale of change in the area, whilst minimising or avoiding altogether the inherent environmental costs.

10. MONITORING THE APPRAISAL

10.1 The Neighbourhood Plan proposes that the progress in its implementation will be assessed using the measures for each objective set out in this report. The data for these measures is collected by the Borough Council as part of the monitoring of its Local Plan and Sustainability Appraisal. The Parish Council will also endeavour to monitor the progress of the plan. Should any real or potential negative impacts be identified then the Councils will seek to review the relevant policies and their implementation.