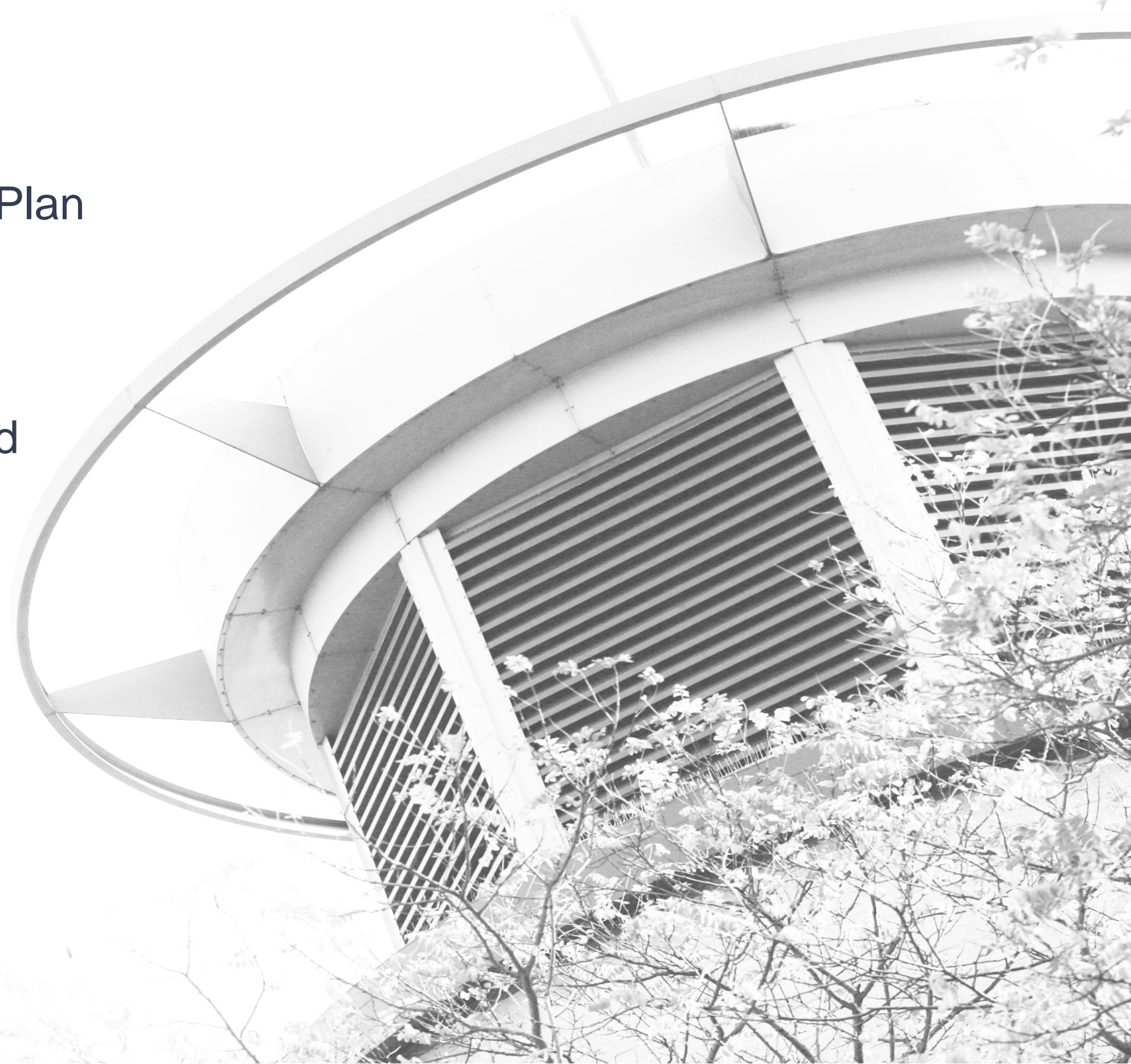
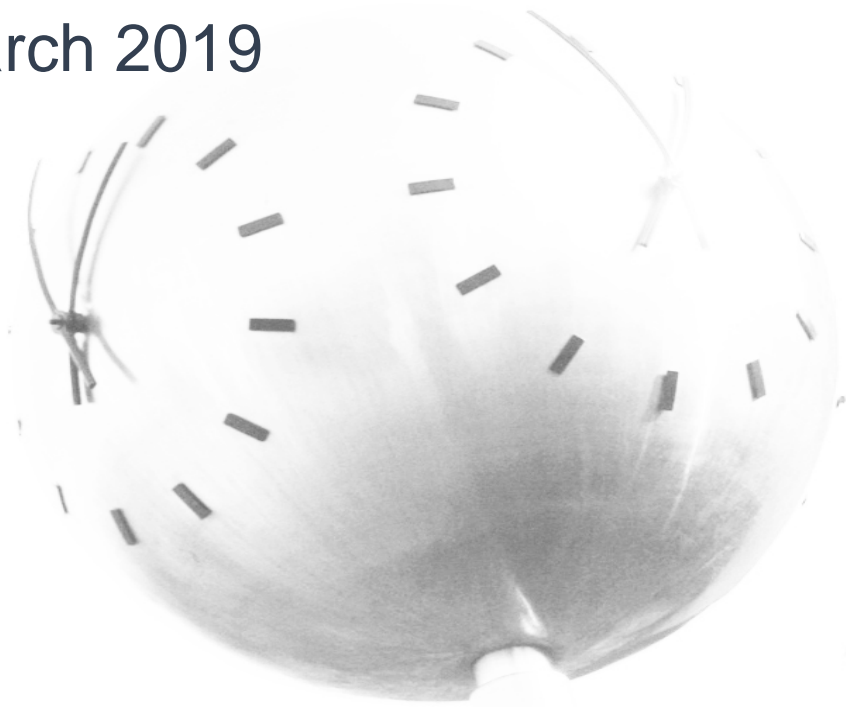


Basildon Borough  
Revised Publication Local Plan  
2014-2034

Schedule of Regulation 20  
Comments relating to the  
Sustainability Appraisal and  
Habitats Regulation  
Assessment

March 2019



## Sustainability Appraisal

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
<a href="#">RPLP/1229</a>	Miss Katherine Greenwood				No	No	Justified; Effective	No		The report does not discuss Greens Farm Lane transport usage, it briefly covers the water tank under the road which still allows for flooding on Meadoway. It doesn't cover Billericay train station, overcrowding at rush hour and no seats on trains. It doesn't cover impact on local educational establishments like Sunnymede Infants and Juniors and Sunnymede Preschool. These issues will make access to the schools and surrounding houses almost impossible. ALready the increased number of cars on the road is making delays on the time taken to get into and out of the Meadoway, and parking very difficult. There should be a path or road run along the Sunnymede school field from Greens Farm Lane new housing to easy the transport issues in the Meadoway.	
<a href="#">RPLP/2510</a>	Mr Roland Lazarus					No	Justified; Consistent with national policy			<p>The sustainability Appraisals and Strategic Environmental Assessments have not guided or effectively influenced the development of the R.P. Local plan.</p> <p>Of the 19 new residential sites in the RP Local Plan- H4 to H22 one has one positive no double positive 5 negative and 2 double negative, that is H21. one has 4 positives and 8 negatives - H22. one has 5 positives or double positives and 8 negatives - H9. one has 5 positives and 6 negatives- H4. H10 has 4 positives and 8 negatives. H16 has 6 positives , 7 negatives and a double negative. H15 has 6 positives, 5 negatives and 2 double negatives. These are all more negative than positive.</p> <p>H20 has 7 positives and a double positive with 5 negatives. H19 has 4 positives, 5 double positives 5 negatives and 2 double negatives.</p> <p>All the rest, H5, H6, H7, H8, H11, H12, H13, H14,H17 and H19 have at least 2 double positives and 10 positives</p>	RPLP-2510 R Lazarus 1_Redacted1.pdf
<a href="#">RPLP/2640</a>	Mr Roland Lazarus					No	Justified; Effective; Consistent with national policy			<p>The sustainability assessment need to consider the distance of new residential developments from hospital services as a severe negative.</p> <p>Time to reach a hospital by public transport should not be more than half hour.</p> <p>Time for ambulances to reach residents should not be increased by policies in the Local Plan.</p>	RPLP- 2645 R Lazarus 4_Redacted 1.pdf
<a href="#">RPLP/2678</a>	Mr Roland Lazarus				No	No	Justified; Consistent with national policy			The Sustainability Appraisals, Strategic Environmental Assessments and Habitats Regulations are inadequate because they do not cover all of the 92 ha of land provided for employment purposes in the Local Plan.	RPLP- 2667 R Lazarus 5_Redacted 4.pdf



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<a href="#">RPLP/2686</a>	Mr Roland Lazarus				No	No	Justified; Consistent with national policy			The Sustainability Appraisals, Strategic Environmental Assessments are inadequate because they do not cover all of the 92ha of land provided for employment purposes in the Local Plan.	RPLP- 2667 R Lazarus 5_redacted 5.pdf
<a href="#">RPLP/2518</a>	Mr Roland Lazarus				No	No	Positively prepared; Justified; Effective; Consistent with national policy			<p>The sustainability Appraisals and Strategic Environmental Assessments have not guided or effectively influenced the development of the R.P. Local plan.</p> <p>Of the 19 new residential sites in the RP Local Plan- H4 to H22 one has one positive no double positive 5 negative and 2 double negative, that is H21. one has 4 positives and 8 negatives - H22. one has 5 positives or double positives and 8 negatives - H9. one has 5 positives and 6 negatives- H4. H10 has 4 positives and 8 negatives. H16 has 6 positives , 7 negatives and a double negative. H15 has 6 positives, 5 negatives and 2 double negatives. These are all more negative than positive.</p> <p>H20 has 7 positives and a double positive with 5 negatives. H19 has 4 positives, 5 double positives 5 negatives and 2 double negatives.</p> <p>All the rest, H5, H6, H7, H8, H11, H12, H13, H14,H17 and H19 have at least 2 double positives and 10 positives</p>	RPLP-2510 R Lazarus 1_Redacted3.pdf
<a href="#">RPLP/2667</a>	Mr Roland Lazarus					No	Consistent with national policy			The Sustainability Appraisals, Strategic Environmental Assessments and Habitats Regulations are inadequate because they do not cover all of the 92 ha of land provided for employment purposes in the Local Plan.	RPLP- 2667 R Lazarus 5_Redacted 1.pdf
<a href="#">RPLP/2521</a>	Mr Roland Lazarus				No	No	Positively prepared; Justified; Consistent with national policy			<p>The sustainability Appraisals and Strategic Environmental Assessments have not guided or effectively influenced the development of the R.P. Local plan.</p> <p>Of the 19 new residential sites in the RP Local Plan- H4 to H22 one has one positive no double positive 5 negative and 2 double negative, that is H21. one has 4 positives and 8 negatives - H22. one has 5 positives or double positives and 8 negatives - H9. one has 5 positives and 6 negatives- H4. H10 has 4 positives and 8 negatives. H16 has 6 positives , 7 negatives and a double negative. H15 has 6 positives, 5 negatives and 2 double negatives. These are all more negative than positive.</p> <p>H20 has 7 positives and a double positive with 5 negatives. H19 has 4 positives, 5 double positives 5 negatives and 2 double negatives.</p> <p>All the rest, H5, H6, H7, H8, H11, H12, H13, H14,H17 and H19 have at least 2 double positives and 10 positives</p>	RPLP-2510 R Lazarus 1_Redacted3.pdf RPLP-2510 R Lazarus 1_Redacted4.pdf

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<a href="#">RPLP/2529</a>	Mr Roland Lazarus				No	No	Positively prepared; Justified; Effective; Consistent with national policy			<p>The sustainability Appraisals and Strategic Environmental Assessments have not guided or effectively influenced the development of the R.P. Local plan.</p> <p>Of the 19 new residential sites in the RP Local Plan- H4 to H22 one has one positive no double positive 5 negative and 2 double negative, that is H21. one has 4 positives and 8 negatives - H22. one has 5 positives or double positives and 8 negatives - H9. one has 5 positives and 6 negatives- H4. H10 has 4 positives and 8 negatives. H16 has 6 positives , 7 negatives and a double negative. H15 has 6 positives, 5 negatives and 2 double negatives. These are all more negative than positive.</p> <p>H20 has 7 positives and a double positive with 5 negatives. H19 has 4 positives, 5 double positives 5 negatives and 2 double negatives.</p> <p>All the rest, H5, H6, H7, H8, H11, H12, H13, H14,H17 and H19 have at least 2 double positives and 10 positives</p>	RPLP-2510 R Lazarus 1_Redacted3.pdf RPLP-2510 R Lazarus 1_Redacted4.pdf RPLP-2510 R Lazarus 1_redacted5.pdf
<a href="#">RPLP/2671</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective			The Sustainability Appraisals, Strategic Environmental Assessments and Habitats Regulations are inadequate because they do not cover all of the 92 ha of land provided for employment purposes in the Local Plan.	RPLP- 2667 R Lazarus 5_Redacted 2.pdf
<a href="#">RPLP/2676</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective			The Sustainability Appraisals, Strategic Environmental Assessments and Habitats Regulations are inadequate because they do not cover all of the 92 ha of land provided for employment purposes in the Local Plan.	RPLP- 2667 R Lazarus 5_Redacted 3.pdf
<a href="#">RPLP/90</a>	miss georgina adams				No	No	Justified	No		Virutally no jobs planned for billericay so minimal economic benefits can be calimed by adding to the population by 20% the negative effect would be the increase of pressure on our roads and train services.	
<a href="#">RPLP/89</a>	miss georgina adams				No	No	Justified	No		Virutally no jobs planned for billericay so minimal economic benefits can be calimed by adding to the population by 20% the negative effect would be the increase of pressure on our roads and train services.	
<a href="#">RPLP/108</a>	Dr Seyed Khorshid				No	No	Justified	No		Wholly inadequate,	
<a href="#">RPLP/43</a>	Mrs Linda Thomas				No	No	Justified	No		Additional housing on this scale cannot be sustainable.	
<a href="#">RPLP/2802</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	I would be content for my words to stand for themselves - assuming they are readable! But - I fear the Council or others may wish to participate at the oral examination in defence of any one, or all of , their green belt	There has been no Sustainability Appraisal, Strategic Environmental Assessment or Habitats Regulations Assessment of the effects of the new main roads out of Wickford and across South West Billericay. The wider effects of cutting green corridor habitats should be assessed including the effects of any new landscape barriers and buffer zones proposed.	RPLP- 2777 R Lazarus 7_redacted 5.pdf

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									<p>assessments, reviews or their replacements.</p> <p>Assuming the Council replaced each of the previous assessments or reviews because they found them, or were told, they were inadequate, it is exasperating to come to the Regulation 19 consultation facing a new review of Green Belt containing errors and repeating methodological failings, 30 months later.</p> <p>It is not possible to see how Green Belt has been a restraint on development. Openness has made no discernible difference to sites chosen. The revised Publication Local Plan is mostly a plan for urban sprawl. It is a systematic, unsustainable, undermining of Green Belt Policy.</p>	<p>The wider effects of the increase in, and redistribution of traffic, need to be assessed in new reports before new Sustainability assessments can be carried out.</p> <p>This is a breach of directive 2001/42/EC.</p>	
<a href="#">RPLP/2058</a>	Miss Anna Davies	Taylor Wimpey	Mr Taylor Cherrett	Turley	No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes		<p>Sustainability Appraisal (SA)</p> <p>5.1 The SEA/SA Regulations Schedule 2(8) requires an “assessment of reasonable alternatives” and the identification of the “<i>reasons for selecting the alternatives tested in the light of the others available.</i>” In <i>Ashdown Forest Economic Development LLP v SSCLG and Wealden DC</i> [2014] EWHC 406 (Admin), Mr Justice Sales held (at paragraph 97) that the plan-maker should be aware “<i>The court will be alert to scrutinise its choices regarding reasonable alternatives to ensure that it is not seeking to avoid that obligation by saying that there are no reasonable alternatives or by improperly limiting the range of such alternatives which is identified.</i>”.</p> <p>5.2 It is clear that in a number of cases BBC have not adequately considered reasonable alternatives to meet this clear legal requirement.</p> <p>5.3 In relation to Chapter 6 of the Publication Local Plan (Achieving Sustainable Development), which considers the policies which seek to outline and manage the level of growth anticipated, namely Policy</p>	<p>RPLP-1908 Turley-Taylor Wimpey Land at Kingsmans Farm Policy H17c Part3_Redacted.pdf</p> <p>RPLP-1908 Turley-Taylor Wimpey Land at Kingsmans Farm - Policy H17c Part1_Redacted.pdf</p> <p>RPLP-1908 Turley-Taylor Wimpey Response Booklet.pdf</p> <p>RPLP-1908 Turley-Taylor Wimpey Land at Kingsmans Farm - Policy H17c Part2.pdf</p>

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
										<p>SD1: A Strategic Approach to Sustainable Development in Basildon Borough, the SA notes in relation to reasonable alternatives:</p> <p><i>“Despite the significant adverse effects of accommodating the scale and distribution of growth planned for in the Borough in the Publication Local Plan, it is recognised that the rate of housing delivery expected in the Plan period falls short of that considered necessary to support housing need and economic growth. Consequently, a significant adverse effect has been identified against SA objective 5 (housing) in combination with the significant positive effect identified in acknowledgement of the significant growth that has been planned for. It should be noted that if additional growth were to be accommodated within the Borough it is likely that the significant adverse effects that have been identified against the environmental SA objectives 1 (landscape, countryside and green spaces), 2 (historic environment), 3 (biodiversity) and 13 (flood risk) would be more reinforced.”</i></p> <p>5.4 This is not considered an adequate approach to the consideration of reasonable alternatives. A full assessment of the implications of the Council meeting its housing need in full should be undertaken, as well as an assessment of delivering development beyond the housing need in light of the requirement of the JSP.</p> <p>5.5 An SA style assessment, as provided for the proposed policies (Table 6.2 for instance), should be undertaken for all reasonable alternatives in relation to housing need.</p> <p>5.6 We note that the Council have provided a SA assessment of the “South West Billericay High Level Development Framework” starting at page 284 of the appendices to the assessment.</p> <p>5.7 This, we understand, has considered the following reasonable alternatives:•</p> <ul style="list-style-type: none"> <li>• The High Level Development Framework by Pell Frischman;</li> <li>• Extension of the residential development in the Preferred High Level Development Framework to the west of Tye Common further south to the northern edge of Tye Common Road •</li> <li>• Extension of the residential development in the Preferred High Level Development Framework to the west of Tye Common further south to the northern edge of Tye Common Road and re-routes the new relief road along the western edge of this extension, across Tye Common Road, before turning east and running along the southern edge of the development. This preferred route of the relief road cuts off the north western corner of Frith Wood, resulting in the loss of a small area of ancient woodland.</li> </ul>	

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										<p>5.8 It is clear that from an SA perspective the proposed options score exactly the same on every single criteria as one another (save for 13, albeit it is not clear why this is not the same for all options as it relates to flood risk).</p> <p>5.9 It is therefore not clear why the Council have sought to choose an option which delivers less housing and which would have the same sustainability impact as the other options which deliver a greater level of housing, especially in the context of the unmet need.</p> <p>5.10 It is therefore considered that the SA supports the allocation of additional land at South West Billericay. In line with paragraph 47 of the Framework.</p> <p>5.11 Also, and as noted, in these representations, TW have provided robust evidence to that demonstrate Firth Wood is not ancient, as enclosed at <b>Appendix 3</b>. TW therefore ask for the SA to be updated in this respect. TW would also ask that the Council consider through the SA the alternative relief options presented by TW in Chapter 3.</p>	
<a href="#">RPLP/1199</a>	Mr Gavin Taylor				No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	Explain the above in full	I have already answered on my return for SD1	
<a href="#">RPLP/120</a>	Mrs Lynn Ray				Yes	No	Effective	No		I am not sure how is acceptable for there to be building on areas inhabited by badgers who are supposed to be protected.	
<a href="#">RPLP/651</a>	Mrs Lynn Ray				Yes	No	Effective	No		I am not sure how is acceptable for there to be building on areas inhabited by badgers who are supposed to be protected.	
<a href="#">RPLP/652</a>	Mrs Lynn Ray				Yes	No	Effective	No		I am not sure how is acceptable for there to be building on areas inhabited by badgers who are supposed to be protected.	
<a href="#">RPLP/25</a>	Mrs Janet Bourne				Yes	Yes		No		<p>I am concerned that the building on are H14 will greatly affect local wildlife habitat. We have witnessed the decline in species in our own garden over the last 15 years, and are concerned that the new buildings will diminish areas for hedgehogs birds invertibrates and pollinators.</p> <p>We are also very worried about the impact of traffic in the surrounding roads. The plans state that access to H14 will be gained via Haslemere road and Farnham avenue. The 540 houses will bring a minimum of 1080 vehicles to the area. The average house does still use 2 vehicles, some have one but these are balanced by families that have children still living at home who do drive. This is also added to by visitors.</p>	

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										<p>The Junction on Haslemere road which leads into the Barn Hall recreation ground is sited on a bend, due to people parking on the bend and across the pavements at the current junction, it is extremely dangerous to drive into and out of the area. Due to the degree of the bend at this junction, you are unable to see around the bend to know if it is clear to pass, as people park in the road around the bend you are effectively driving blind when trying to exit the estate. This is the same on all bends and all junctions on the Barn Hall estate currently.</p> <p>When trying to exit Barn hall onto Swan Lane from Alderney gardens at the Lower end junction, it is very hard to view vehicles driving down hill from Brock Hill as the house on the corner has a hedge which restricts the view. This is also a very tight corner for turning.</p> <p>The bus route travels up Guernsey gardens into Alderney gardens and this junction is also very tight.</p> <p>With regards to the Farnham avenue access, this will increase the traffic by Wickford station, which is currently highly congested. Trying to then turn into and exit station avenue from the high street is also a traffic blackspot in rush hour, which is not helped by one side of the road being used for parking by the second hand furniture shop, who park a large van there, the bookmakers and the newsagents customers.</p> <p>Wickford highstreet is barely passable with people parking on the highstreet, and is often at a standstill as there are no passing places left to allow for traffic flow. We realise the need for new homes, but the current road infrastructure is not in place for 5000 new homes.</p> <p>The healthcare provision in Wickford has degraded rapidly during 2018 when one of our health centres closed. It is impossible to get an appointment to see a doctor without booking 3 weeks in advance. We have disabled family members and are greatly concerned with the diminishing healthcare provision, which will also be negatively affected by another 5000 families moving to Wickford.</p> <p>The planning infrastructure needs to be in place with new roads, healthcare and schools and community amenities, before any further houses are built and not as an afterthought.</p> <p>A very concerned resident of Wickford</p>	
<a href="#">RPLP/2660</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective; Consistent			<p>The sustainability assessment need to consider the distance of new residential developments from hospital services as a severe negative.</p> <p>Time to reach a hospital by public transport should not be more than half hour.</p>	RPLP- 2645 R Lazarus 4_Redacted 5.pdf



Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
							with national policy			Time for ambulances to reach residents should not be increased by policies in the Local Plan.	
<a href="#">RPLP/2554</a>	Mr Jamie Robert Melvin	Natural England								<p>Habitats Regulations Assessment</p> <p>Recreational Disturbance</p> <p>Our comments above relating to policy wording notwithstanding, Natural England commends the progress your authority and others have made with regards to mitigating impacts on the Essex Natura 2000 sites and we are confident that the Essex RAMS will safeguard the relevant designated features. We consider that the project is sufficiently progressed for us to agree with the HRA conclusion that <b>Basildon Borough Publication Local Plan will not result in adverse effects on the integrity of European sites, either alone or in-combination with other plans and projects</b> as a result of recreational impacts provided we can agree appropriate policy wording to ensure the strategy is delivered.</p> <p>Water Quality</p> <p>The HRA states that mitigation to address the uncertain effects of development on International sites is provided through Policy SD1, the strategic housing Policy H1 and Policy IMP1 which require that development is phased to align with provision of the infrastructure needed to support it. Natural England advises that, as currently worded, these policies do not offer sufficient mitigation to satisfactorily address this issue.</p> <p>We suggest that there needs to be a commitment in policy to co-operate with other utilities and service providers to ensure that appropriate capacity is available to serve new development and a clear statement that new development will only be permitted if the required capacity is available at the relevant water treatment works, including any associated sewer connections.</p> <p>Sustainability Appraisal</p> <p>We are satisfied that the SA objectives, assessment methodology and framework generally accord with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Regulations.</p>	RPLP-2544 Natural England_redacted.pdf
<a href="#">RPLP/2594</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective; Consistent with national policy	No		At the Draft Local Plan Stage Alternative 2 to the proposal for H20 land west of Tye Common Road was for at least 360 new homes (The H20 allocation was 160). The Sustainability Assessment was not done for 360 - alternative 2 with the explanation given that it was not a reasonable alternative. we now look at a Revised Publication Local	RPLP-2594 R Lazarus 3_Redacted1.pdf

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										Plan with around 350 new homes for Land West of Tye Common Road H17c.  We have been denied sight of a Sustainability Appraisal or Strategic Environmental Assessment at Regulation 18.  This was a breach of Directive 2001/42/EC	
<a href="#">RPLP/1192</a>	Mr Gavin Taylor				No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	I have already said that I totally disagree with the with this politically motivated plan has been put together and need to be heard to emphasise this.	I have already answered in my return on SD1	
<a href="#">RPLP/2809</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective; Consistent with national policy			The sustainability appraisal should consider the inappropriate disproportional allocation of land for employment and land for housing at a Borough wide scale. The collective, accumulative effects of an oversupply of new employment land south of the A127 with an overall claimed undersupply of housing but an excessive supply of new housing around Billericay and Wickford, would be bad for the economy, the environment and society. Journey to work times would increase - and lateness. Pollution and carbon emissions unjustifiably increased.	RPLP - 2805 R Lazarus 8_redacted 2.pdf
<a href="#">RPLP/2548</a>	Mr Jamie Robert Melvin	Natural England								Habitats Regulations Assessment  Recreational Disturbance  Our comments above relating to policy wording notwithstanding, Natural England commends the progress your authority and others have made with regards to mitigating impacts on the Essex Natura 2000 sites and we are confident that the Essex RAMS will safeguard the relevant designated features. We consider that the project is sufficiently progressed for us to agree with the HRA conclusion that <b>Basildon Borough Publication Local Plan will not result in adverse effects on the integrity of European sites, either alone or in-combination with other plans and projects</b> as a result of recreational impacts provided we can agree appropriate policy wording to ensure the strategy is delivered.  Water Quality  The HRA states that mitigation to address the uncertain effects of development on International sites is provided through Policy SD1, the strategic housing Policy H1 and Policy IMP1 which require that development is phased to align with provision of the infrastructure needed to support it. Natural England advises that, as currently	RPLP-2544 Natural England_redacted.pdf

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										<p>worded, these policies do not offer sufficient mitigation to satisfactorily address this issue.</p> <p>We suggest that there needs to be a commitment in policy to co-operate with other utilities and service providers to ensure that appropriate capacity is available to serve new development and a clear statement that new development will only be permitted if the required capacity is available at the relevant water treatment works, including any associated sewer connections.</p> <p>Sustainability Appraisal</p> <p>We are satisfied that the SA objectives, assessment methodology and framework generally accord with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Regulations.</p>	
<a href="#">RPLP/2701</a>	Mr Rex Kemp				Yes	No	Justified; Effective	No		a large loss of green belt will have an adverse effect on the quality and quantity of wild life in our area and lead to a reduction of those things that have a benefit on our well being and environment	RPLP- 2701 R Kemp_Redacted 5.pdf
<a href="#">RPLP/2826</a>	Mr Roland Lazarus					No	Justified; Effective			The sustainability appraisal should consider the inappropriate disproportional allocation of land for employment and land for housing at a Borough wide scale. The collective, accumulative effects of an oversupply of new employment land south of the A127 with an overall claimed undersupply of housing but an excessive supply of new housing around Billericay and Wickford, would be bad for the economy, the environment and society. Journey to work times would increase - and lateness. Pollution and carbon emissions unjustifiably increased.	RPLP - 2805 R Lazarus 8_redacted 4.pdf
<a href="#">RPLP/2</a>	Mr Chris Carter				No	No	Positively prepared; Justified; Effective	Yes	because local residents and tax payers have clearly been ignored and we must be heard	frithwood is ancient woodland fact!	
<a href="#">RPLP/750</a>	Dr John L Victory				Yes	No	Justified; Effective	No		no comment	
<a href="#">RPLP/1198</a>	Mr Gavin Taylor				No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	To explain verbally the concept of protecting green belt. Words can become mixed up and their meaning interpreted away from the author's intentions.	I have already answered on my return on SD1	
<a href="#">RPLP/958</a>	miss Tina Diprose				No	No	Positively prepared;	No		A sustainability assessment has not been conducted to support the distribution of housing. Housing has been simply allocated	

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							Justified; Effective; Consistent with national policy			proportional to population rather than the ability for a town's infrastructure to support development. This is not inline with the pursuit of sustainable development that seeks to improve the conditions that people, live, work and take leisure.	
<a href="#">RPLP/1245</a>	Mr Matt Stokoe				Yes	No	Justified; Effective; Consistent with national policy	No		N/A	
<a href="#">RPLP/1255</a>	Ms Lisa Fletcher				Yes	No	Justified; Effective; Consistent with national policy	No		N/A	
<a href="#">RPLP/2251</a>		Bellway Homes and Crest Nicholson	David Carlisle	AECOM	No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	<p>Yes, our clients wish to participate at the examination hearing sessions.</p> <p>The detailed points raised in our main representations raise several fundamental soundness issues that can only be addressed via main modifications should the plan be submitted without modification.</p>	<p>Our concerns with the Sustainability Appraisal (SA) report (October, 2018) are twofold -</p> <p>1) The report does not present sufficient information on reasonable alternatives. Whilst the report does present some limited information on alternatives in relation to a number of policies in isolation, it does not present information on alternatives in respect of the issue at the very heart of the plan, namely the allocation of land for housing and the spatial strategy and distribution of those sites (and their relative performance against the SA objectives).</p> <p>2) The report does not present an outline of the reasons for selecting the alternatives dealt with (as required by law and set out in the planning practice guidance). In each instance the report fails to present outline reasons to justify the range of site alternatives examined. For example, on <b>pages 57-71</b> we see a range of alternatives in relation to the matter of high-level consideration of sites. Various site alternatives are presented in <b>Figure 4.2 pg62</b>, with no explanation of why these represent the reasonable alternatives, in relation to this particular issue. The fundamental flaw with the SA process is that reasonable alternatives, in terms of alternative 'basket of sites' have not been examined in relation to the key objective at the heart of the plan, namely allocation of a package of sites to meet objectively assessed housing needs.</p> <p>1.14 The report does present information in relation to the matter of differing housing quanta, and in relation to the matter of broad distribution. The SA must test alternative growth quanta and include a series of reasonable alternatives for differing packages of sites (avoiding 'straw men' and without undue reliance on former extant policies and previous Local Plan consultations).</p>	RPLP-2245 Bellway Homes and Crest Nicholson Local Plan representations 17 12 2018.pdf



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										<p>1.15 The SA cannot be said to be analysis of 'reasonable alternatives' in the context of a Local Plan. It is not the role of Local Plans to simply determine a housing growth quanta figure, nor is it the role of Local Plans to simply define a broad distribution for housing growth. The approach taken by Basildon is clearly contrary to the legal requirement, which is to examine reasonable alternatives [Reg 12(2)] "taking into account the objectives and geographical scope of the plan".</p> <p>1.16 Clearly the geographical scope of the plan is the Local Authority area, and the key objective is to allocate a package of sites to meet objectively assessed needs, and support the achievement of wider objectives. There can be no confidence that the Council sufficiently grappled with the matter of spatial strategy ahead of preparing the Regulation 19 Local Plan, and we can conclude that stakeholders were not presented with information on genuine reasonable alternatives as part of this Regulation 19 consultation.</p> <p>1.17 The Council instead relies on an SA that deals with the policies in isolation and one high level appraisal of Policy SD1 which is almost meaningless, let alone relevant for assessing its suitability against the SA objectives without a clear comparison against other reasonable alternatives.</p>	
<a href="#">RPLP/8</a>	Mr Geoffrey Clark				Yes	Yes		No	N/A	N/A	
<a href="#">RPLP/2788</a>	Mr Roland Lazarus				No	No	Positively prepared; Justified; Effective; Consistent with national policy			<p>There has been no Sustainability Appraisal, Strategic Environmental Assessment or Habitats Regulations Assessment of the effects of the new main roads out of Wickford and across South West Billericay. The wider effects of cutting green corridor habitats should be assessed including the effects of any new landscape barriers and buffer zones proposed.</p> <p>The wider effects of the increase in, and redistribution of traffic, need to be assessed in new reports before new Sustainability assessments can be carried out.</p> <p>This is a breach of directive 2001/42/EC.</p>	RPLP- 2777 R Lazarus 7_redacted 3.pdf
<a href="#">RPLP/2793</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective; Consistent with national policy	No		<p>There has been no Sustainability Appraisal, Strategic Environmental Assessment or Habitats Regulations Assessment of the effects of the new main roads out of Wickford and across South West Billericay. The wider effects of cutting green corridor habitats should be assessed including the effects of any new landscape barriers and buffer zones proposed.</p> <p>The wider effects of the increase in, and redistribution of traffic, need to be assessed in new reports before new Sustainability assessments can be carried out.</p>	RPLP- 2777 R Lazarus 7_redacted 4.pdf

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
										This is a breach of directive 2001/42/EC.	
<a href="#">RPLP/1865</a>		Gleeson Developments Ltd	Mrs Jacqueline Mulliner	Terence O'Rourke Ltd	Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	Gleeson Strategic Land have a significant interest in land within the Borough and allocated within the Plan, and consider it necessary to participate at the oral part of the examination to further elaborate on the points raised within the representations, and to discuss the evidence presented and the required changes to the Plan to make it sound.		RPLP-1844 TOR-Gleeson cover letter_Redacted.pdf RPLP-1844 TOR-Gleeson Consultation_Response_Booklet_Redacted.pdf RPLP-1844 TOR-Gleeson H17_181217 Representation.pdf
<a href="#">RPLP/2249</a>		Bellway Homes and Crest Nicholson	David Carlisle	AECOM	No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	<p>Yes, our clients wish to participate at the examination hearing sessions.</p> <p>The detailed points raised in our main representations raise several fundamental soundness issues that can only be addressed via main modifications should the plan be submitted without modification.</p>	<p>Our concerns with the Sustainability Appraisal (SA) report (October, 2018) are twofold -</p> <p>1) The report does not present sufficient information on reasonable alternatives. Whilst the report does present some limited information on alternatives in relation to a number of policies in isolation, it does not present information on alternatives in respect of the issue at the very heart of the plan, namely the allocation of land for housing and the spatial strategy and distribution of those sites (and their relative performance against the SA objectives).</p> <p>2) The report does not present an outline of the reasons for selecting the alternatives dealt with (as required by law and set out in the planning practice guidance). In each instance the report fails to present outline reasons to justify the range of site alternatives examined. For example, on <b>pages 57-71</b> we see a range of alternatives in relation to the matter of high-level consideration of sites. Various site alternatives are presented in <b>Figure 4.2 pg62</b>, with no explanation of why these represent the reasonable alternatives, in relation to this particular issue. The fundamental flaw with the SA process is that reasonable alternatives, in terms of alternative 'basket of sites' have not been examined in relation to the key objective at the heart of the plan, namely allocation of a package of sites to meet objectively assessed housing needs.</p> <p>1.14 The report does present information in relation to the matter of differing housing quanta, and in relation to the matter of broad distribution. The SA must test alternative growth quanta and include a series of reasonable alternatives for differing packages of sites (avoiding 'straw men' and without undue reliance on former extant policies and previous Local Plan consultations).</p>	RPLP-2245 Bellway Homes and Crest Nicholson Local Plan representations 17 12 2018.pdf

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										<p>1.15 The SA cannot be said to be analysis of 'reasonable alternatives' in the context of a Local Plan. It is not the role of Local Plans to simply determine a housing growth quanta figure, nor is it the role of Local Plans to simply define a broad distribution for housing growth. The approach taken by Basildon is clearly contrary to the legal requirement, which is to examine reasonable alternatives [Reg 12(2)] "taking into account the objectives and geographical scope of the plan".</p> <p>1.16 Clearly the geographical scope of the plan is the Local Authority area, and the key objective is to allocate a package of sites to meet objectively assessed needs, and support the achievement of wider objectives. There can be no confidence that the Council sufficiently grappled with the matter of spatial strategy ahead of preparing the Regulation 19 Local Plan, and we can conclude that stakeholders were not presented with information on genuine reasonable alternatives as part of this Regulation 19 consultation.</p> <p>1.17 The Council instead relies on an SA that deals with the policies in isolation and one high level appraisal of Policy SD1 which is almost meaningless, let alone relevant for assessing its suitability against the SA objectives without a clear comparison against other reasonable alternatives.</p>	
<a href="#">RPLP/2621</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective; Consistent with national policy			<p>At the Draft Local Plan Stage Alternative 2 to the proposal for H20 land west of Tye Common Road was for at least 360 new homes (The H20 allocation was 160). The Sustainability Assessment was not done for 360 - alternative 2 with the explanation given that it was not a reasonable alternative. we now look at a Revised Publication Local Plan with around 350 new homes for Land West of Tye Common Road H17c.</p> <p>We have been denied sight of a Sustainability Appraisal or Strategic Environmental Assessment at Regulation 18.</p> <p>This was a breach of Directive 2001/42/EC</p>	RPLP-2594 R Lazarus 3_Redacted 3.pdf
<a href="#">RPLP/490</a>	Dr John Kelk				Yes	No	Justified	No		The area proposed forms part of a natural corridor for local wildlife.	
<a href="#">RPLP/261</a>	Mrs Jo Frost				Yes	Yes		No		r	
<a href="#">RPLP/1288</a>	Mr Jeffrey Fairfull				Yes	No	Consistent with national policy	No		These plans will result in a reduction in wildlife habitat and wildlife corridors. It will result in urban sprawl and a severe reduction in Green Belt open land which currently provides significant and essential benefits to residents new and old alike. It will result in a severe reduction in the quality of life for all concerned	
<a href="#">RPLP/1061</a>	Mr Kelvin Pont				No	No	Positively prepared; Justified; Effective	No		Common sense says it all. The roads are full, Schools are bursting at the seams , no new doctors, dentists, we are full p.	

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<a href="#">RPLP/1143</a>	Mr Daniel Porter	Stock Parish Council			No	No	Positively prepared; Effective; Consistent with national policy	No		Stock Parish Council believe this site is not sustainable in respect of highways, education, health, drainage and other social and physical infrastructure. There are open views with quality landscape and ecology which should be subject to screening; as none of this testing and analysis has been formulated, examined and weighed up prior to this allocation, such a designation flies in the face of the very basic principle of Green Belt and its purpose.	
<a href="#">RPLP/437</a>	Mr Simon Elwell				No	No	Justified; Effective	No		The sustainability appraisal is inadequate - it has failed to properly consider: <ul style="list-style-type: none"> <li>• Railway capacity</li> <li>• A127 and other strategic roads capacities</li> <li>• Local roads capacities</li> <li>• Vehicle parking availability</li> <li>• The impact of building 2,800 homes with no plan to create new jobs in Billericay</li> <li>• GPs, Hospitals' and other Health facilities' ability to cope</li> <li>• Schools, especially primary</li> <li>• Sewage handling capacity</li> <li>• Water drainage capability</li> <li>• Much accessible countryside lost.</li> <li>• Affordable housing for Billericay's young people</li> </ul>	
<a href="#">RPLP/2629</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective; Consistent with national policy			At the Draft Local Plan Stage Alternative 2 to the proposal for H20 land west of Tye Common Road was for at least 360 new homes (The H20 allocation was 160). The Sustainability Assessment was not done for 360 - alternative 2 with the explanation given that it was not a reasonable alternative. we now look at a Revised Publication Local Plan with around 350 new homes for Land West of Tye Common Road H17c.  We have been denied sight of a Sustainability Appraisal or Strategic Environmental Assessment at Regulation 18.  This was a breach of Directive 2001/42/EC	RPLP-2594 R Lazarus 3_Redacted 4.pdf
<a href="#">RPLP/4203</a>	Mrs Brenda Allaker					No	Justified	No		We should be meeting the needs of the present without compromising the ability of future ,. generations, effectively our schools are filled to the maximum. We do not need to jeopardise, their future. I would suggest possibly building another school on one of these sites instead of houses. We need to prevent Billericay becoming overpopulated. Please note: Not all residents of Billericay are able to voice their opinions on-line or in writing mainly because they do not have access to internet or are not in the position to complete the forms. This isn't a fair representation of our thoughts as a total community. There should be a way of perhaps arranging meetings for those less able in these circumstances.	RPLP- 4193 B Allaker_redacted.pdf



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<a href="#">RPLP/3928</a>	Mr Christopher Poulten				Yes	No	Justified	No		Not applicable	RPLP-3928 C Poulten_Redacted.pdf
<a href="#">RPLP/253</a>	Mr Lee Alford				No	No	Justified; Consistent with national policy	No		There is no evidence of significant infrastructure to cope with the large increase in population. There is also no need to build on the green belt when there are many houses for sale in Billericay already. The government should build new towns away from existing towns.	
<a href="#">RPLP/125</a>	Mrs Pam Bishop				No	No	Justified	No		You are not looking at the whole picture. Your planning is nothing short of shambolic.	
<a href="#">RPLP/1075</a>	Mr Stephen Sibbons				Yes	No	Justified			It will not be able to be sustained, the wait for the doctors is already 2 weeks and traffic is bad enough with the current people who live here.	
<a href="#">RPLP/615</a>	Mr David Crest				No	No	Justified; Effective	No		When I click on the link it just takes me back to the homepage. How can I comment?	
<a href="#">RPLP/1292</a>	Mr Jeffrey Fairfull				Yes	No	Positively prepared; Consistent with national policy	No		If these plans proceed it will result in a loss of wildlife habitat and wildlife corridors. It will result in urban sprawl and a severe reduction in Green Belt open land which currently provides significant and essential benefits to residents old and new alike. It will result substantial reduction in the quality of life for all concerned.	
<a href="#">RPLP/1195</a>	Mr Gavin Taylor				No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	To explain what the developers should be required to include in their planning permission for each plot, which goes deeper than just each plot.if the Planning Inspector passes the Plan and ignores the NPPF then we need to consider the best way to work together.	I have already answered on my return on SD1	
<a href="#">RPLP/2289</a>	Miss Michele Oliver				No	No	Positively prepared; Justified; Effective	No		I have already mentioned this above, however:  The amount of construction suggested for areas H17 and H18 is unfounded and should be re-sited. This land is sustainable farmland and protected Green Belt. It also offers some of the best views and walks around the Billericay area and offers much needed natural habitat for wildlife. There is also reports of badger's sets within this area that cannot be destroyed. This area is also prone to flooding. Millions of pounds would need to be spent to make it a viable area for such mass construction and this can only be reflected in the price of the housing.	RPLP-2286 Oliver3_redacted.pdf RPLP-2286 Oliver6_redacted.pdf
<a href="#">RPLP/2259</a>		Scott Properties and	Mr David Churchill	Carter Jonas	Yes	No	Effective; Consistent	Yes	As the promoter of land at H17b, M Scott Properties and McCarthy	The Plan has failed to identify sufficient sites in order to meet the full objectively assessed of the Borough within the stated Plan period. The Sustainability Appraisal fails to adequately assess higher growth	RPLP-2257 Scott and M-7 Wider Context Plan.pdf

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
		McCarthy & Stone					with national policy		and Stone are best placed to advise on the necessary policy wording to ensure the delivery of the site are not undermined.	<p>options as part of the 'reasonable alternatives' in order to meet these needs. Policy SD1 cannot reasonably be considered to make a 'significant positive' impact to SA Objective 7 when it fundamentally fails to meet the identified housing needs of the Borough.</p> <p>The Council will need to ensure that the impact of higher growth scenarios (that both meet and exceed the OAN of the Borough) have been adequately assessed. This assessment may then inform Main Modifications to the Plan if the findings suggest these are required in order to make the Plan sound.</p> <p>Our representations highlight deficiencies in the Local Plan and Sustainability Appraisal that go to the heart of Plan Making. We wish to support the Council in ensuring the Plan is made sound and can be bought forward for adoption in the earliest possible instance.</p>	RPLP-2257 Scott and McCarth letter.pdf RPLP-2257 Scott and M-4 Tennis Club map.pdf RPLP-2257 Scott and M-3 map amendments.pdf RPLP-2257 Scott and M-5 Opps Constraints.pdf RPLP-2257 Scott and M-1 - Highways Report.pdf RPLP-2257 Scott and M-6 Masterplan Framewk.pdf RPLP-2257 Scott and McCarth Reg 19 Booklet.pdf RPLP-2257 Scott and M-2 Policy Amendments.pdf
<a href="#">RPLP/2877</a>	Mr Peter Garrod				Yes	No	Effective; Consistent with national policy	No		<p>The development will almost certainly lead to some economic growth within the Billericay area, although the actual number of jobs to be created in Billericay are very few jobs will be created along the A127 corridor but the success may be undetermined by the overall economic situation in the country, especially as a secession could be on the canal if there is no brexit deal.</p> <p>The development will obviously have an adverse effect on wildlife. Has the impact on wildlife been fully considered. Are there badger setts on the land? Has any consideration been given to the protected species like bats which may be present in the area? Are there any wild flowers which are rare and may face extinction if the land is developed. The key question is does the green belt land under threat provide habitat for endangered species?</p> <p>Whilst the release of land for industrial development near Ford Dunton could have a positive effect on the area and peoples general well being, the development will not work if people are unable to get to work due to the roads being heavily congested. This clearly will be a source of major frustration to many people in the area. The lack of GPs, doctor surgeries and no provision of a new hospital in the area will cause concern for a vance number of people. Finally, the loss of footpath and access to open spaces will have a detrimental effect on peoples happiness and well being.</p>	RPLP-2877 P Garrod_redacted.pdf

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
<a href="#">RPLP/1157</a>	Mr Robert Maclean				Yes	No	Justified	No		Majority of these houses are being built on green belt land which will destroy the natural beauty of Billericay as well as destroying the habitats of wildlife.	
<a href="#">RPLP/1846</a>		Gleeson Developments Ltd	Mrs Jacqueline Mulliner	Terence O'Rourke Ltd	Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	Gleeson Strategic Land have a significant interest in land within the Borough and allocated within the Plan, and consider it necessary to participate at the oral part of the examination to further elaborate on the points raised within the representations, and to discuss the evidence presented and the required changes to the Plan to make it sound.		RPLP-1844 TOR-Gleeson Consultation_Response_Booklet_Redacted.pdf RPLP-1844 TOR-Gleeson cover letter_Redacted.pdf RPLP-1844 TOR-Gleeson H17_181217 Representation.pdf
<a href="#">RPLP/3165</a>	Pauline Bowles	Little Burstead Parish Council			Yes	No	Justified; Effective; Consistent with national policy	No		Not applicable - none given.	RPLP - 3161 Bowles - Little Burstead_redacted.pdf
<a href="#">RPLP/2634</a>	Mr Roland Lazarus				No		Positively prepared; Justified; Effective; Consistent with national policy			At the Draft Local Plan Stage Alternative 2 to the proposal for H20 land west of Tye Common Road was for at least 360 new homes (The H20 allocation was 160). The Sustainability Assessment was not done for 360 - alternative 2 with the explanation given that it was not a reasonable alternative. we now look at a Revised Publication Local Plan with around 350 new homes for Land West of Tye Common Road H17c.  We have been denied sight of a Sustainability Appraisal or Strategic Environmental Assessment at Regulation 18.  This was a breach of Directive 2001/42/EC	RPLP-2594 R Lazarus 3_Redacted 5.pdf
<a href="#">RPLP/3280</a>	Mrs Pat Brown				Yes	No	Justified; Effective; Consistent with national policy	No		Greenbelt should be used for what it is intended! People to enjoy, to preserve plants, trees, animals insects & birds.  Once the greenbelt is removed you cannot "get it back". The contents cannot be removed & put elsewhere they will simply be lost forever. Councils do not have to build on green belt, Billericay does not want to lose its green belt.	RPLP-3274 Brown_Redacted.pdf
<a href="#">RPLP/2060</a>	Miss Anna Davies	Taylor Wimpey	Mr Taylor Cherrett	Turley	No	No	Positively prepared; Justified; Effective; Consistent	Yes		Sustainability Appraisal (SA)  5.1 The SEA/SA Regulations Schedule 2(8) requires an "assessment of reasonable alternatives" and the identification of the "reasons for selecting the alternatives tested in the light of the others available." In	RPLP-1908 Turley-Taylor Wimpey Land at Kingsmans Farm - Policy H17c Part2.pdf RPLP-1908

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							with national policy			<p>Ashdown Forest Economic Development LLP v SSCLG and Wealden DC [2014] EWHC 406 (Admin), Mr Justice Sales held (at paragraph 97) that the plan-maker should be aware <i>“The court will be alert to scrutinise its choices regarding reasonable alternatives to ensure that it is not seeking to avoid that obligation by saying that there are no reasonable alternatives or by improperly limiting the range of such alternatives which is identified.”</i></p> <p>5.2 It is clear that in a number of cases BBC have not adequately considered reasonable alternatives to meet this clear legal requirement.</p> <p>5.3 In relation to Chapter 6 of the Publication Local Plan (Achieving Sustainable Development), which considers the policies which seek to outline and manage the level of growth anticipated, namely Policy SD1: A Strategic Approach to Sustainable Development in Basildon Borough, the SA notes in relation to reasonable alternatives:</p> <p><i>“Despite the significant adverse effects of accommodating the scale and distribution of growth planned for in the Borough in the Publication Local Plan, it is recognised that the rate of housing delivery expected in the Plan period falls short of that considered necessary to support housing need and economic growth. Consequently, a significant adverse effect has been identified against SA objective 5 (housing) in combination with the significant positive effect identified in acknowledgement of the significant growth that has been planned for. It should be noted that if additional growth were to be accommodated within the Borough it is likely that the significant adverse effects that have been identified against the environmental SA objectives 1 (landscape, countryside and green spaces), 2 (historic environment), 3 (biodiversity) and 13 (flood risk) would be more reinforced.”</i></p> <p>5.4 This is not considered an adequate approach to the consideration of reasonable alternatives. A full assessment of the implications of the Council meeting its housing need in full should be undertaken, as well as an assessment of delivering development beyond the housing need in light of the requirement of the JSP.</p> <p>5.5 An SA style assessment, as provided for the proposed policies (Table 6.2 for instance), should be undertaken for all reasonable alternatives in relation to housing need.</p> <p>5.6 We note that the Council have provided a SA assessment of the “South West Billericay High Level Development Framework” starting at page 284 of the appendices to the assessment.</p> <p>5.7 This, we understand, has considered the following reasonable alternatives:•</p>	<p>Turley-Taylor Wimpey Response Booklet.pdf RPLP-1908 Turley-Taylor Wimpey Land at Kingsmans Farm - Policy H17c Part1_Redacted.pdf RPLP-1908 Turley-Taylor Wimpey Land at Kingsmans Farm Policy H17c Part3_Redacted.pdf</p>



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										<ul style="list-style-type: none"> <li>The High Level Development Framework by Pell Frischman;</li> <li>Extension of the residential development in the Preferred High Level Development Framework to the west of Tye Common further south to the northern edge of Tye Common Road •</li> <li>Extension of the residential development in the Preferred High Level Development Framework to the west of Tye Common further south to the northern edge of Tye Common Road and re-routes the new relief road along the western edge of this extension, across Tye Common Road, before turning east and running along the southern edge of the development. This preferred route of the relief road cuts off the north western corner of Frith Wood, resulting in the loss of a small area of ancient woodland.</li> </ul> <p>5.8 It is clear that from an SA perspective the proposed options score exactly the same on every single criteria as one another (save for 13, albeit it is not clear why this is not the same for all options as it relates to flood risk).</p> <p>5.9 It is therefore not clear why the Council have sought to choose an option which delivers less housing and which would have the same sustainability impact as the other options which deliver a greater level of housing, especially in the context of the unmet need.</p> <p>5.10 It is therefore considered that the SA supports the allocation of additional land at South West Billericay. In line with paragraph 47 of the Framework.</p> <p>5.11 Also, and as noted, in these representations, TW have provided robust evidence to that demonstrate Firth Wood is not ancient, as enclosed at <b>Appendix 3</b>. TW therefore ask for the SA to be updated in this respect. TW would also ask that the Council consider through the SA the alternative relief options presented by TW in Chapter 3.</p>	
<a href="#">RPLP/2787</a>	Mr Richard Overill				Yes	No	Justified; Effective	No		The presentation of mature woodland areas should be a priority.	RPLP-2787 R Overill redacted.pdf
<a href="#">RPLP/4205</a>	Mrs Brenda Allaker					No	Justified	No		We should be meeting the needs of the present without compromising the ability of future ,. generations, effectively our schools are filled to the maximum. We do not need to jeopardise, their future. I would suggest possibly building another school on one of these sites instead of houses. We need to prevent Billericay becoming overpopulated. Please note: Not all residents of Billericay are able to voice their opinions on-line or in writing mainly because they do not have access to internet or are not in the position to complete the forms. This isn't a fair representation of our thoughts as a total community. There should be a way of perhaps arranging meetings for those less able in these circumstances.	RPLP- 4193 B Allaker_redacted.pdf

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<a href="#">RPLP/259</a>	Mr Lee Alford				No	No	Justified; Consistent with national policy	No		There is no evidence that any improved infrastructure will cope with the large increase in population when the current infrastructure cannot cope with the current population. There is also no need to build on the green belt when there are many houses for sale in Billericay already. The government should build new towns away from existing towns.	
<a href="#">RPLP/30</a>	Mr Keith Walmsley				No	No	Justified; Consistent with national policy	No		<p>There has been insufficient work carried out on the sustainability of the local plan, the only assessment has been conducted by the massive building companies who have been concentrating on what is not there and with what they can get away with, a point in question being Fritwood which everyone who knows it and uses it regularly knows it to be a thriving community of wildlife.</p> <p>The proposed local plan will destroy this delicate ecosystem. The woods and surrounding area not only enhances the well being of all those who use it but also goes a long way to removing harmful pollution in the local area and deadens noise of traffic emanating from the A127.</p> <p>The removal of so many trees from the area will result in increased pollution and noise.</p>	
<a href="#">RPLP/2738</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective; Consistent with national policy			<p>The Sustainability Appraisal including Strategic Environmental Assessment says on page 579 under 5 "ensure the Borough's Town Centres are promoted"</p> <p>"The policy would provide a moderate amount of residential development. The allocation is to include essential community facilities will compete significantly with town centre uses in Basildon. Therefore a minor positive."</p> <p>H16 is now a site off Potash Road, Billericay. What essential community facilities and services would this allocation include? H16 is 11 hectares. H16 is an entirely new site for around 255 new homes H19 of the Draft Local Plan we saw in June 2016 is not available for development - it is held in ownership to prevent its development. It is next to the new H16.</p> <p>New site H16 does not have a Habitat Regulation Assessment or Sustainability Assessment. A site specific Strategic Environmental Assessment is needed.</p> <p>The nitrous dioxide levels measured at the Potash Road roundabout were in the same range as those near the A127 which have meant sites are not bought forward for development until pollution levels have been acceptably reduced.</p> <p>H19 of the Draft Local Plan included pre-school and primary school facilities. H16 of the RP Local plan does not.</p>	RPLP - 2699 R Lazarus 6_redacted 5.pdf

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<a href="#">RPLP/1863</a>	Mr & Mrs Caroline & Andrew Meades		Alistair Grills	Alistair Grills Associates	No	No	Justified; Consistent with national policy	Yes	Alistair Grills of AGA, Allan Mendelsohn of ADL and John-Paul Friend of LVIA Ltd would wish to attend the examination to discuss this policy allocation as there are multiple complex factors raised by the policy that require the testing and cross examination of written and oral evidence.	The objectors do not agree with the bullet point sustainability appraisal for Policy H18 in para. 6.44 of the Sustainability Appraisal, particularly in respect of the assessed significant positive effect on SA Objective 19 - reducing traffic congestion, noise & fume pollution by channelling development to sustainable locations. ADL's Transport Impacts Assessment makes clear this is not the case as H18 is not in a sustainable location in transport terms and has severe access problems.	RPLP-1744 Grills_Transport Impact Assessment Technical Appendix_Redacted.pdf RPLP-1744 Grills_Transport Impact Assessment_Redacted.pdf RPLP-1744 Grills_Green Belt Analysis & LVIA H18 RPLP-1744 Grills_Green Belt Analysis & LVIA Alternative Sites RPLP-1744 Grills_Representation_Redacted.pdf RPLP-1744 Grills_Booklet 1_Redacted.pdf RPLP-1744 Grills_Archaeological Assessment_Redacted.pdf RPLP-1744 Grills_Booklet 2_Redacted.pdf
<a href="#">RPLP/2987</a>	Ms Helen Watkins				No		Justified; Effective; Consistent with national policy	Yes	I would attend to present the local knowledge as to why H18 is inappropriate for development and to test BBC's evidence and conclusion that it is suitable for development.	By way of background, the field to the south of Windmill Heights has been considered at various stages of the Local Plan with different references. Firstly as H24, occupying approximately a third of the field to the north. See Image 1 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW. The alternatives, in order of the Council's preference, were 70 houses, none and 45.  Then the field was brought forward as Alternative Site (AS) 10 with a proposal of 170 houses, with some public open land to the southeast. See Image 2 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW.  The field has now been brought forward as Policy H18 in the BBC RPLP with a proposal of 200 houses. See Image 3 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW. There is no information in the RPLP where public open land might feature in the site, nor where pedestrian or vehicular access may be provided.	RPLP-2987 Watkins_Redacted.pdf Appendix C to BBC RPLP Response Booklet Sustainability Appraisal-Comments - HW.pdf Appendix B (Part 2) to BBC RPLP Response Booklet Representations on Policy H18 - HW.pdf Appendix B (Part 1) to BBC RPLP Response Booklet Representations on Policy H18- HW.pdf 4597 - Helen Watkins - Land South of

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
										<p>Turning now to my comments on the Sustainability Appraisal and in particular to the Appendices.</p> <p>I refer to Policy H18 on pages 587-590 of the Appendices.</p> <p>SA Objective 1</p> <p>The Appraisal refers to H18 Policy to build landscape buffers to the west and south of the site. On the contrary, the Policy refers only to landscape impacts to the west of the site. The landscape buffers to the south of the field are proposed for other reasons, not as a mitigant of visual impacts. The landscape impacts to the south and east of the sites have not been considered in the Policy and the Appraisal, hence the Appraisal's conclusion of a minor negative effect regarding SA1 is flawed.</p> <p>SA Objective 2</p> <p>The Appraisal refers to the site partially containing an archaeological priority area. The Appraisal concludes that "Policy H18 is likely to have an adverse effect on this objective; however this adverse effect is only considered to be minor given the relatively small scale of the development proposed." This precise wording has been copy-pasted from the Appraisal of H24 on page 236 of the Appendices. That might have been arguable in the context of H24 which had an allocation of 45-70 houses, but is incorrect in the context of a much larger development of 200 houses. Hence the Appraisal's conclusion of a minor adverse effect is flawed.</p> <p>SA Objective 8</p> <p>The Appraisal refers to new green infrastructure and that the landscape buffers to the west and south (existing and supplementing) should seek to deliver open space. There is no plan in the Policy for how the for open space will be accessed by the public. The western boundary of the site is adjacent to the 50 mph A176 which has no pavement, no pedestrians and a few brave cyclists. The south of the site is bordered by Kennel Lane. Kennel Lane is a rural road, with space for only one car to pass at various points, with a blind summit and blind corners. It is not suitable for pedestrians. How would open space be created which would respect the existing hedgerow and treeline? Please see Image 4 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW.</p> <p>The Appraisal's conclusion that Policy H18 will have a significant positive effect re SA8 is flawed.</p> <p>SA Objectives 8, 11, 14, 15 and 19</p>	Windmill Heights - PEA - V4.0.pdf



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										<p>The Appraisal references the 'easy walking distance' to local facilities to in these SA Objectives, and the development allocation therefore having a significant positive effect. The access to the site is specified to be from Kennel Lane. Please see Images 5&amp;6 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW. Kennel Lane is a rural road, with space for only one car to pass at various points, with a blind summit and blind corners. It is not suitable for pedestrians.</p> <p>The Appraisal's conclusion that Policy H18 will have a significant positive effect re SA8,11, 14, 15 and 19 is flawed.</p>	
<a href="#">RPLP/2991</a>	Ms Helen Watkins					No	Justified; Effective; Consistent with national policy	Yes	I would attend to present the local knowledge as to why H18 is inappropriate for development and to test BBC's evidence and conclusion that it is suitable for development.	<p>By way of background, the field to the south of Windmill Heights has been considered at various stages of the Local Plan with different references. Firstly as H24, occupying approximately a third of the field to the north. See Image 1 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW. The alternatives, in order of the Council's preference, were 70 houses, none and 45.</p> <p>Then the field was brought forward as Alternative Site (AS) 10 with a proposal of 170 houses, with some public open land to the southeast. See Image 2 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW.</p> <p>The field has now been brought forward as Policy H18 in the BBC RPLP with a proposal of 200 houses. See Image 3 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW. There is no information in the RPLP where public open land might feature in the site, nor where pedestrian or vehicular access may be provided.</p> <p>Turning now to my comments on the Sustainability Appraisal and in particular to the Appendices.</p> <p>I refer to Policy H18 on pages 587-590 of the Appendices.</p> <p>SA Objective 1</p> <p>The Appraisal refers to H18 Policy to build landscape buffers to the west and south of the site. On the contrary, the Policy refers only to landscape impacts to the west of the site. The landscape buffers to the south of the field are proposed for other reasons, not as a mitigant of visual impacts. The landscape impacts to the south and east of the sites have not been considered in the Policy and the Appraisal, hence the Appraisal's conclusion of a minor negative effect regarding SA1 is flawed.</p> <p>SA Objective 2</p>	<p>4597 - Helen Watkins - Land South of Windmill Heights - PEA - V4.0.pdf Appendix B (Part 1) to BBC RPLP Response Booklet Representations on Policy H18- HW.pdf RPLP-2987 Watkins_Redacted.pdf Appendix B (Part 2) to BBC RPLP Response Booklet Representations on Policy H18 - HW.pdf Appendix C to BBC RPLP Response Booklet Sustainability Appraisal- Comments - HW.pdf</p>

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										<p>The Appraisal refers to the site partially containing an archaeological priority area. The Appraisal concludes that "Policy H18 is likely to have an adverse effect on this objective; however this adverse effect is only considered to be minor given the relatively small scale of the development proposed." This precise wording has been copy-pasted from the Appraisal of H24 on page 236 of the Appendices. That might have been arguable in the context of H24 which had an allocation of 45-70 houses, but is incorrect in the context of a much larger development of 200 houses. Hence the Appraisal's conclusion of a minor adverse effect is flawed.</p> <p>SA Objective 8</p> <p>The Appraisal refers to new green infrastructure and that the landscape buffers to the west and south (existing and supplementing) should seek to deliver open space. There is no plan in the Policy for how the for open space will be accessed by the public. The western boundary of the site is adjacent to the 50 mph A176 which has no pavement, no pedestrians and a few brave cyclists. The south of the site is bordered by Kennel Lane. Kennel Lane is a rural road, with space for only one car to pass at various points, with a blind summit and blind corners. It is not suitable for pedestrians. How would open space be created which would respect the existing hedgerow and treeline? Please see Image 4 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW.</p> <p>The Appraisal's conclusion that Policy H18 will have a significant positive effect re SA8 is flawed.</p> <p>SA Objectives 8, 11, 14, 15 and 19</p> <p>The Appraisal references the 'easy walking distance' to local facilities to in these SA Objectives, and the development allocation therefore having a significant positive effect. The access to the site is specified to be from Kennel Lane. Please see Images 5&amp;6 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW. Kennel Lane is a rural road, with space for only one car to pass at various points, with a blind summit and blind corners. It is not suitable for pedestrians.</p> <p>The Appraisal's conclusion that Policy H18 will have a significant positive effect re SA8,11, 14, 15 and 19 is flawed.</p>	
<a href="#">RPLP/2993</a>	Ms Helen Watkins					No	Justified; Effective; Consistent with national policy	Yes	I would attend to present the local knowledge as to why H18 is inappropriate for development and to test BBC's evidence and conclusion that it is suitable for development.	By way of background, the field to the south of Windmill Heights has been considered at various stages of the Local Plan with different references. Firstly as H24, occupying approximately a third of the field to the north. See Image 1 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW. The alternatives, in order of the Council's preference, were 70 houses, none and 45.	4597 - Helen Watkins - Land South of Windmill Heights - PEA - V4.0.pdf Appendix B (Part 2) to BBC RPLP Response Booklet

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										<p>Then the field was brought forward as Alternative Site (AS) 10 with a proposal of 170 houses, with some public open land to the southeast. See Image 2 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW.</p> <p>The field has now been brought forward as Policy H18 in the BBC RPLP with a proposal of 200 houses. See Image 3 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW. There is no information in the RPLP where public open land might feature in the site, nor where pedestrian or vehicular access may be provided.</p> <p>Turning now to my comments on the Sustainability Appraisal and in particular to the Appendices.</p> <p>I refer to Policy H18 on pages 587-590 of the Appendices.</p> <p>SA Objective 1</p> <p>The Appraisal refers to H18 Policy to build landscape buffers to the west and south of the site. On the contrary, the Policy refers only to landscape impacts to the west of the site. The landscape buffers to the south of the field are proposed for other reasons, not as a mitigant of visual impacts. The landscape impacts to the south and east of the sites have not been considered in the Policy and the Appraisal, hence the Appraisal's conclusion of a minor negative effect regarding SA1 is flawed.</p> <p>SA Objective 2</p> <p>The Appraisal refers to the site partially containing an archaeological priority area. The Appraisal concludes that "Policy H18 is likely to have an adverse effect on this objective; however this adverse effect is only considered to be minor given the relatively small scale of the development proposed." This precise wording has been copy-pasted from the Appraisal of H24 on page 236 of the Appendices. That might have been arguable in the context of H24 which had an allocation of 45-70 houses, but is incorrect in the context of a much larger development of 200 houses. Hence the Appraisal's conclusion of a minor adverse effect is flawed.</p> <p>SA Objective 8</p> <p>The Appraisal refers to new green infrastructure and that the landscape buffers to the west and south (existing and supplementing) should seek to deliver open space. There is no plan in the Policy for how the for open space will be accessed by the public. The western boundary of the site is adjacent to the 50 mph A176 which has no pavement, no pedestrians and a few brave cyclists. The south of the site is bordered by Kennel Lane. Kennel Lane is a rural road, with</p>	<p>Representations on Policy H18 - HW.pdf Appendix C to BBC RPLP Response Booklet Sustainability Appraisal-Comments - HW.pdf Appendix B (Part 1) to BBC RPLP Response Booklet Representations on Policy H18- HW.pdf RPLP-2987 Watkins_Redacted.pdf</p>

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										<p>space for only one car to pass at various points, with a blind summit and blind corners. It is not suitable for pedestrians. How would open space be created which would respect the existing hedgerow and treeline? Please see Image 4 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW.</p> <p>The Appraisal's conclusion that Policy H18 will have a significant positive effect re SA8 is flawed.</p> <p>SA Objectives 8, 11, 14, 15 and 19</p> <p>The Appraisal references the 'easy walking distance' to local facilities to in these SA Objectives, and the development allocation therefore having a significant positive effect. The access to the site is specified to be from Kennel Lane. Please see Images 5&amp;6 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW. Kennel Lane is a rural road, with space for only one car to pass at various points, with a blind summit and blind corners. It is not suitable for pedestrians.</p> <p>The Appraisal's conclusion that Policy H18 will have a significant positive effect re SA8,11, 14, 15 and 19 is flawed.</p>	
<a href="#">RPLP/2995</a>	Ms Helen Watkins					No	Justified; Effective; Consistent with national policy	Yes	I would attend to present the local knowledge as to why H18 is inappropriate for development and to test BBC's evidence and conclusion that it is suitable for development.	<p>By way of background, the field to the south of Windmill Heights has been considered at various stages of the Local Plan with different references. Firstly as H24, occupying approximately a third of the field to the north. See Image 1 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW. The alternatives, in order of the Council's preference, were 70 houses, none and 45.</p> <p>Then the field was brought forward as Alternative Site (AS) 10 with a proposal of 170 houses, with some public open land to the southeast. See Image 2 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW.</p> <p>The field has now been brought forward as Policy H18 in the BBC RPLP with a proposal of 200 houses. See Image 3 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW. There is no information in the RPLP where public open land might feature in the site, nor where pedestrian or vehicular access may be provided.</p> <p>Turning now to my comments on the Sustainability Appraisal and in particular to the Appendices.</p> <p>I refer to Policy H18 on pages 587-590 of the Appendices.</p> <p>SA Objective 1</p>	<p>Appendix B (Part 2) to BBC RPLP Response Booklet Representations on Policy H18 - HW.pdf</p> <p>Appendix C to BBC RPLP Response Booklet Sustainability Appraisal- Comments - HW.pdf</p> <p>Appendix B (Part 1) to BBC RPLP Response Booklet Representations on Policy H18- HW.pdf</p> <p>4597 - Helen Watkins - Land South of Windmill Heights - PEA - V4.0.pdf</p> <p>RPLP-2987</p> <p>Watkins_Redacted.pdf</p>



Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
										<p>The Appraisal refers to H18 Policy to build landscape buffers to the west and south of the site. On the contrary, the Policy refers only to landscape impacts to the west of the site. The landscape buffers to the south of the field are proposed for other reasons, not as a mitigant of visual impacts. The landscape impacts to the south and east of the sites have not been considered in the Policy and the Appraisal, hence the Appraisal's conclusion of a minor negative effect regarding SA1 is flawed.</p> <p>SA Objective 2</p> <p>The Appraisal refers to the site partially containing an archaeological priority area. The Appraisal concludes that "Policy H18 is likely to have an adverse effect on this objective; however this adverse effect is only considered to be minor given the relatively small scale of the development proposed." This precise wording has been copy-pasted from the Appraisal of H24 on page 236 of the Appendices. That might have been arguable in the context of H24 which had an allocation of 45-70 houses, but is incorrect in the context of a much larger development of 200 houses. Hence the Appraisal's conclusion of a minor adverse effect is flawed.</p> <p>SA Objective 8</p> <p>The Appraisal refers to new green infrastructure and that the landscape buffers to the west and south (existing and supplementing) should seek to deliver open space. There is no plan in the Policy for how the for open space will be accessed by the public. The western boundary of the site is adjacent to the 50 mph A176 which has no pavement, no pedestrians and a few brave cyclists. The south of the site is bordered by Kennel Lane. Kennel Lane is a rural road, with space for only one car to pass at various points, with a blind summit and blind corners. It is not suitable for pedestrians. How would open space be created which would respect the existing hedgerow and treeline? Please see Image 4 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW.</p> <p>The Appraisal's conclusion that Policy H18 will have a significant positive effect re SA8 is flawed.</p> <p>SA Objectives 8, 11, 14, 15 and 19</p> <p>The Appraisal references the 'easy walking distance' to local facilities to in these SA Objectives, and the development allocation therefore having a significant positive effect. The access to the site is specified to be from Kennel Lane. Please see Images 5&amp;6 of Appendix C to BBC RPLP Response Booklet – Sustainability Appraisal - Comments - HW. Kennel Lane is a rural road, with space for only one car to pass</p>	

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										at various points, with a blind summit and blind corners. It is not suitable for pedestrians.  The Appraisal's conclusion that Policy H18 will have a significant positive effect re SA8,11, 14, 15 and 19 is flawed.	
<a href="#">RPLP/4208</a>	Mrs Brenda Allaker					No	Justified	No		We should be meeting the needs of the present without compromising the ability of future ,, generations, effectively our schools are filled to the maximum. We do not need to jeopardise, their future. I would suggest possibly building another school on one of these sites instead of houses. We need to prevent Billericay becoming overpopulated. Please note: Not all residents of Billericay are able to voice their opinions on-line or in writing mainly because they do not have access to internet or are not in the position to complete the forms. This isn't a fair representation of our thoughts as a total community. There should be a way of perhaps arranging meetings for those less able in these circumstances.	RPLP- 4193 B Allaker_redacted.pdf
<a href="#">RPLP/1431</a>	Mr Jeffrey Fairfull				Yes	No	Effective; Consistent with national policy	No		The Sustainability Appraisal and and habitat Assessment has not demonstrated the Councils Plan can be achieved without resulting in a substantial reduction in wildlife habitat and wildlife corridors. It will result in urban sprawl and a severe reduction in Green Belt open land which currently provides significant and essential benefits to residents new and old alike. It will result in a unacceptable reduction in quality of life for all concerned.	
<a href="#">RPLP/4214</a>	Mrs Brenda Allaker					No	Justified	No		We should be meeting the needs of the present without compromising the ability of future ,, generations, effectively our schools are filled to the maximum. We do not need to jeopardise, their future. I would suggest possibly building another school on one of these sites instead of houses. We need to prevent Billericay becoming overpopulated. Please note: Not all residents of Billericay are able to voice their opinions on-line or in writing mainly because they do not have access to internet or are not in the position to complete the forms. This isn't a fair representation of our thoughts as a total community. There should be a way of perhaps arranging meetings for those less able in these circumstances.	RPLP- 4193 B Allaker_redacted.pdf
<a href="#">RPLP/1</a>	Mr David Ascott							No		<b>see previous section</b>	
<a href="#">RPLP/2552</a>	Mr Jamie Robert Melvin	Natural England				No				Habitats Regulations Assessment  Recreational Disturbance  Our comments above relating to policy wording notwithstanding, Natural England commends the progress your authority and others have made with regards to mitigating impacts on the Essex Natura 2000 sites and we are confident that the Essex RAMS will safeguard the relevant designated features. We consider that the project is sufficiently progressed for us to agree with the HRA conclusion that <b>Basildon Borough Publication Local Plan will not result in</b>	RPLP-2544 Natural England_redacted.pdf

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										<p><b>adverse effects on the integrity of European sites, either alone or in-combination with other plans and projects</b> as a result of recreational impacts provided we can agree appropriate policy wording to ensure the strategy is delivered.</p> <p>Water Quality</p> <p>The HRA states that mitigation to address the uncertain effects of development on International sites is provided through Policy SD1, the strategic housing Policy H1 and Policy IMP1 which require that development is phased to align with provision of the infrastructure needed to support it. Natural England advises that, as currently worded, these policies do not offer sufficient mitigation to satisfactorily address this issue.</p> <p>We suggest that there needs to be a commitment in policy to co-operate with other utilities and service providers to ensure that appropriate capacity is available to serve new development and a clear statement that new development will only be permitted if the required capacity is available at the relevant water treatment works, including any associated sewer connections.</p> <p>Sustainability Appraisal</p> <p>We are satisfied that the SA objectives, assessment methodology and framework generally accord with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Regulations.</p>	
<a href="#">RPLP/1873</a>		Gleeson Developments Ltd	Mrs Jacqueline Mulliner	Terence O'Rourke Ltd	Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	Gleeson Strategic Land have a significant interest in land within the Borough and allocated within the Plan, and consider it necessary to participate at the oral part of the examination to further elaborate on the points raised within the representations, and to discuss the evidence presented and the required changes to the Plan to make it sound.		RPLP-1844 TOR-Gleeson Consultation_Response_Booklet_Redacted.pdf RPLP-1844 TOR-Gleeson H17_181217 Representation.pdf RPLP-1844 TOR-Gleeson cover letter_Redacted.pdf
<a href="#">RPLP/4216</a>	Mrs Brenda Allaker					No	Justified	No		We should be meeting the needs of the present without compromising the ability of future generations, effectively our schools are filled to the maximum. We do not need to jeopardise, their future. I would suggest possibly building another school on one of these sites instead of houses. We need to prevent Billericay becoming overpopulated. Please note: Not all residents of Billericay are able to voice their	RPLP- 4193 B Allaker_redacted.pdf

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
										opinions on-line or in writing mainly because they do not have access to internet or are not in the position to complete the forms. This isn't a fair representation of our thoughts as a total community. There should be a way of perhaps arranging meetings for those less able in these circumstances.	
<a href="#">RPLP/2816</a>	Mr Roland Lazarus					No	Justified; Effective			The sustainability appraisal should consider the inappropriate disproportional allocation of land for employment and land for housing at a Borough wide scale. The collective, accumulative effects of an oversupply of new employment land south of the A127 with an overall claimed undersupply of housing but an excessive supply of new housing around Billericay and Wickford, would be bad for the economy, the environment and society. Journey to work times would increase - and lateness. Pollution and carbon emissions unjustifiably increased.	RPLP - 2805 R Lazarus 8_redacted 3.pdf
<a href="#">RPLP/4217</a>	Mrs Brenda Allaker					No	Justified	No		We should be meeting the needs of the present without compromising the ability of future generations, effectively our schools are filled to the maximum. We do not need to jeopardise their future. I would suggest possibly building another school on one of these sites instead of houses. We need to prevent Billericay becoming overpopulated. Please note: Not all residents of Billericay are able to voice their opinions on-line or in writing mainly because they do not have access to internet or are not in the position to complete the forms. This isn't a fair representation of our thoughts as a total community. There should be a way of perhaps arranging meetings for those less able in these circumstances.	RPLP- 4193 B Allaker_redacted.pdf
<a href="#">RPLP/2805</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective; Consistent with national policy			The sustainability appraisal should consider the inappropriate disproportional allocation of land for employment and land for housing at a Borough wide scale. The collective, accumulative effects of an oversupply of new employment land south of the A127 with an overall claimed undersupply of housing but an excessive supply of new housing around Billericay and Wickford, would be bad for the economy, the environment and society. Journey to work times would increase - and lateness. Pollution and carbon emissions unjustifiably increased.	RPLP - 2805 R Lazarus 8_Redacted 1.pdf
<a href="#">RPLP/217</a>	Mrs Kate Lotts				No	No	Positively prepared	No		See Comments in Section B	
<a href="#">RPLP/2645</a>	Mr Roland Lazarus				No	No	Justified; Effective; Consistent with national policy			The sustainability assessment need to consider the distance of new residential developments from hospital services as a severe negative.  Time to reach a hospital by public transport should not be more than half hour.  Time for ambulances to reach residents should not be increased by policies in the Local Plan.	RPLP- 2645 R Lazarus 4_Redacted 2.pdf
<a href="#">RPLP/1880</a>		Gleeson Developments Ltd	Mrs Jacqueline Mulliner	Terence O'Rourke Ltd	Yes	No	Positively prepared; Justified;	Yes	Gleeson Strategic Land have a significant interest in land within the		RPLP-1844 TOR-Gleeson H17_181217

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							Effective; Consistent with national policy		Borough and allocated within the Plan, and consider it necessary to participate at the oral part of the examination to further elaborate on the points raised within the representations, and to discuss the evidence presented and the required changes to the Plan to make it sound.		Representation.pdf RPLP-1844 TOR-Gleeson Consultation_Response_Booklet_Redacted.pdf RPLP-1844 TOR-Gleeson cover letter_Redacted.pdf
<a href="#">RPLP/1372</a>	Cllr Chris Jackman				No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	<p>As the sponsoring councillor for the Hovefields and Honily Neighbourhood area (HHNA) and member of the HHNA steering committee with no voting rights or pecuniary interest.</p> <p>The policies in H3, H4 and H24 are counter productive to the aim of the Neighbourhood Area to redress the numerous challenges (build, land and social) presented at Hovefields, Wickford. Basildon Council has failed its duties under the localism act 2011 to adequately engage with the Steering committee as evidenced by published materials and presentations to develop a sustainable community.</p>	<p>Hovefields Wickford had two Great crested newt ponds both of which have been filled by spoil as a result of the installation of hard standings. These have never been enforced despite the protected status. As highlighted in the Aecom Supplementary Environmental/ Ecological Site Assessment . The report for Hovefields Drive and Hovefields Avenue feb 2016 reported was prepared for Basildon Borough Council by Aecom and demonstrates the need for major work to redress the surface water management issues at the site, this fails SA 13 as noted by the Surface Water Management Plan ECC 2012</p> <p>Hovefields is not in walking distance from school, health facilities or transport infrastructure placing reliance on vehicular usage.</p> <p>The Aecom report is not in the evidence base - the report demonstrates any intensification without investment at Hovefields is against SA objectives listed below.</p> <p>BBCs failure to engage with the neighbourhood area which was principally established to address the local challenges in a sustainable and strategic way to redress many of the SA reasons outlined below.</p> <p>SA 1/ 3 non enforcement on infill on Great crested newt ponds, removal of grassland and installation of hard standing from building waste of unknown origin.</p> <p>SA 4 / 6 /7/ 8 - Reduces prosperity and economic growth by virtue of distance from educational and health services</p> <p>SA 9 neglects the settled community of 9 households and with potentially 26 traveller pitches (after the additional 13). Aerial photographs show this is not reflective of the actual number of inhabitants / mobiles and is likely more detrimental to coexistence, so much that the criteria based policies focuses unduly upon Hovefields wickford resulting in the domination of the settled community.</p>	AecomReportpage AecomReportpage (1)



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										9 - approximately 1/3 of Wickford Park ward crime is concentrated from this area 10 - BBC criteria policy will land lock hovefields removing the potential to regenerate / development flexibility	
<a href="#">RPLP/1875</a>		Gleeson Developments Ltd	Mrs Jacqueline Mulliner	Terence O'Rourke Ltd	Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	Gleeson Strategic Land have a significant interest in land within the Borough and allocated within the Plan, and consider it necessary to participate at the oral part of the examination to further elaborate on the points raised within the representations, and to discuss the evidence presented and the required changes to the Plan to make it sound.		RPLP-1844 TOR-Gleeson cover letter_Redacted.pdf RPLP-1844 TOR-Gleeson Consultation_Response_Booklet_Redacted.pdf RPLP-1844 TOR-Gleeson H17_181217 Representation.pdf
<a href="#">RPLP/2656</a>	Mr Roland Lazarus				No	No	Positively prepared; Justified; Effective; Consistent with national policy			The sustainability assessment need to consider the distance of new residential developments from hospital services as a severe negative. Time to reach a hospital by public transport should not be more than half hour. Time for ambulances to reach residents should not be increased by policies in the Local Plan.	RPLP- 2645 R Lazarus 4_Redacted 4.pdf
<a href="#">RPLP/1881</a>		Gleeson Developments Ltd	Mrs Jacqueline Mulliner	Terence O'Rourke Ltd	Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	Gleeson Strategic Land have a significant interest in land within the Borough and allocated within the Plan, and consider it necessary to participate at the oral part of the examination to further elaborate on the points raised within the representations, and to discuss the evidence presented and the required changes to the Plan to make it sound.		RPLP-1844 TOR-Gleeson H17_181217 Representation.pdf RPLP-1844 TOR-Gleeson Consultation_Response_Booklet_Redacted.pdf RPLP-1844 TOR-Gleeson cover letter_Redacted.pdf
<a href="#">RPLP/2252</a>		Bellway Homes and Crest Nicholson	David Carlisle	AECOM	No	No	Positively prepared; Justified; Effective; Consistent	Yes	Yes, our clients wish to participate at the examination hearing sessions.	Our concerns with the Sustainability Appraisal (SA) report (October, 2018) are twofold - 1) The report does not present sufficient information on reasonable alternatives. Whilst the report does present some limited information	RPLP-2245 Bellway Homes and Crest Nicholson Local Plan

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							with national policy		<p>The detailed points raised in our main representations raise several fundamental soundness</p> <p>issues that can only be addressed via main modifications should the plan be submitted without</p> <p>modification.</p>	<p>on alternatives in relation to a number of policies in isolation, it does not present information on alternatives in respect of the issue at the very heart of the plan, namely the allocation of land for housing and the spatial strategy and distribution of those sites (and their relative performance against the SA objectives).</p> <p>2) The report does not present an outline of the reasons for selecting the alternatives dealt with (as required by law and set out in the planning practice guidance). In each instance the report fails to present outline reasons to justify the range of site alternatives examined. For example, on <b>pages 57-71</b> we see a range of alternatives in relation to the matter of high-level consideration of sites. Various site alternatives are presented in <b>Figure 4.2 pg62</b>, with no explanation of why these represent the reasonable alternatives, in relation to this particular issue. The fundamental flaw with the SA process is that reasonable alternatives, in terms of alternative 'basket of sites' have not been examined in relation to the key objective at the heart of the plan, namely allocation of a package of sites to meet objectively assessed housing needs.</p> <p>1.14 The report does present information in relation to the matter of differing housing quanta, and in relation to the matter of broad distribution. The SA must test alternative growth quanta and include a series of reasonable alternatives for differing packages of sites (avoiding 'straw men' and without undue reliance on former extant policies and previous Local Plan consultations).</p> <p>1.15 The SA cannot be said to be analysis of 'reasonable alternatives' in the context of a Local Plan. It is not the role of Local Plans to simply determine a housing growth quanta figure, nor is it the role of Local Plans to simply define a broad distribution for housing growth. The approach taken by Basildon is clearly contrary to the legal requirement, which is to examine reasonable alternatives [Reg 12(2)] <i>"taking into account the objectives and geographical scope of the plan"</i>.</p> <p>1.16 Clearly the geographical scope of the plan is the Local Authority area, and the key objective is to allocate a package of sites to meet objectively assessed needs, and support the achievement of wider objectives. There can be no confidence that the Council sufficiently grappled with the matter of spatial strategy ahead of preparing the Regulation 19 Local Plan, and we can conclude that stakeholders were not presented with information on genuine reasonable alternatives as part of this Regulation 19 consultation.</p> <p>1.17 The Council instead relies on an SA that deals with the policies in isolation and one high level appraisal of Policy SD1 which is almost meaningless, let alone relevant for assessing its suitability against the SA objectives without a clear comparison against other reasonable alternatives.</p>	representations 17 12 2018.pdf

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<a href="#">RPLP/2726</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective; Consistent with national policy			<p>The Sustainability Appraisal including Strategic Environmental Assessment says on page 579 under 5 "ensure the Borough's Town Centres are promoted"</p> <p>"The policy would provide a moderate amount of residential development. The allocation is to include essential community facilities will compete significantly with town centre uses in Basildon. Therefore a minor positive."</p> <p>H16 is now a site off Potash Road, Billericay. What essential community facilities and services would this allocation include? H16 is 11 hectares. H16 is an entirely new site for around 255 new homes H19 of the Draft Local Plan we saw in June 2016 is not available for development - it is held in ownership to prevent its development. It is next to the new H16.</p> <p>New site H16 does not have a Habitat Regulation Assessment or Sustainability Assessment. A site specific Strategic Environmental Assessment is needed.</p> <p>The nitrous dioxide levels measured at the Potash Road roundabout were in the same range as those near the A127 which have meant sites are not bought forward for development until pollution levels have been acceptably reduced.</p> <p>H19 of the Draft Local Plan included pre-school and primary school facilities. H16 of the RP Local plan does not.</p>	RPLP - 2699 R Lazarus 6_Redacted 4.pdf
<a href="#">RPLP/619</a>	Mrs Alison Heine				No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	There would appear to be a number of issues that still need to be addressed/ explain		comments of Mrs Alison Heine on Gypsy Traveller issues comments of Mrs Alison Heine on Gypsy Traveller issues (1)
<a href="#">RPLP/784</a>	Mr Leo Defoe				Yes	No	Positively prepared; Justified	No		No comment	
<a href="#">RPLP/15</a>	Mrs Jacqueline Harris				Yes	Yes		No		PLPLEASE DO NOT USE MY ADDRESS OR PHONE NUMBER OR EMAIL IN ANY CORRESPONDENCE UNLESS SPECIFICALLY AGREED BY ME	
<a href="#">RPLP/3245</a>	Dale Farm Residents Group		Stuart Carruthers							The Basildon Council's Sustainability and Habitat Regulations Assessments are regarded as flawed due to the Basildon Council's failure to seek to meet Objectively Assessed Needs in its Revised Publication Local Plan, and failure to address environmental damage in the Dale Farm and Hovefield areas.	RPLP- 3176 Carruthers - Dale Farm - Gypsy Council_Redacted.pdf

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<a href="#">RPLP/3690</a>	Mrs Christine Barlow	Bowers Gifford and North Benfleet Parish Council						Yes		The Parish Council also notes the provisions and conclusions of the Habitats Regulations Assessment (HRA) in respect of policies SD2, SD3, H11 and E6. It will be able to present a more informed view on the HRA of the Local Plan at the examination using the data and analysis of the HRA of the Neighbourhood Plan.	RPLP-3676 BGNB Parish Council_redacted.pdf
<a href="#">RPLP/3246</a>	Ms Candy Sheridan	The Gypsy Council	Stuart Carruthers							The Basildon Council's Sustainability and Habitat Regulations Assessments are regarded as flawed due to the Basildon Council's failure to seek to meet Objectively Assessed Needs in its Revised Publication Local Plan, and failure to address environmental damage in the Dale Farm and Hovefield areas.	RPLP- 3176 Carruthers - Dale Farm - Gypsy Council_Redacted.pdf
<a href="#">RPLP/1197</a>	Mr Gavin Taylor				No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	To be able to talk in more detail about the impact this plan will have on services and health and well being.	I have already answered on my return on SD1	
<a href="#">RPLP/1026</a>	Mrs margaret ireland				Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	Because this affects our lives		
<a href="#">RPLP/2538</a>	Mr Roland Lazarus				No	No	Positively prepared; Justified; Effective; Consistent with national policy			Population density data and IMD data should be incorporated into the Sustainability Appraisal.  Baseline air quality data is required for all areas of the borough and for the range of pollutants in the air. This baseline air quality data should be incorporated into the S.A and S.E.A - The minimal result from nitrous dioxide testing alone and in one summer month only once is not sufficient. This information should then inform the need to make changes to the distribution and amount of development and or mitigation required.	RPLP-2538 R Lazarus 2_Redacted 1.pdf
<a href="#">RPLP/2830</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective; Consistent with national policy			The sustainability appraisal should consider the inappropriate disproportional allocation of land for employment and land for housing at a Borough wide scale. The collective, accumulative effects of an oversupply of new employment land south of the A127 with an overall claimed undersupply of housing but an excessive supply of new housing around Billericay and Wickford, would be bad for the economy, the environment and society. Journey to work times would increase - and lateness. Pollution and carbon emissions unjustifiably increased.	RPLP - 2805 R Lazarus 8_redacted 5.pdf
<a href="#">RPLP/40</a>	Mrs Karen Jacobs				No	No	Positively prepared;	No		Kent View Recreation Ground is a diverse habitat for various birds and wildlife including several migratory bird species that visit in particular	

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							Justified; Effective			the winter months to feed on the various types of berries plus also protected sand lizards.	
<a href="#">RPLP/2651</a>	Mr Roland Lazarus					No				<p>The sustainability assessment need to consider the distance of new residential developments from hospital services as a severe negative.</p> <p>Time to reach a hospital by public transport should not be more than half hour.</p> <p>Time for ambulances to reach residents should not be increased by policies in the Local Plan.</p>	RPLP- 2645 R Lazarus 4_Redacted 3.pdf
<a href="#">RPLP/1201</a>	Mr Gavin Taylor				No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	To explain the above verbally.	I have already answered on my return for SD1	
<a href="#">RPLP/2578</a>	Mr Roland Lazarus					No	Positively prepared			<p>Population density data and IMD data should be incorporated into the Sustainability Appraisal.</p> <p>Baseline air quality data is required for all areas of the borough and for the range of pollutants in the air. This baseline air quality data should be incorporated into the S.A and S.E.A - The minimal result from nitrous dioxide testing alone and in one summer month only once is not sufficient. This information should then inform the need to make changes to the distribution and amount of development and or mitigation required.</p>	RPLP-2538 R Lazarus 2_Redacted 4.pdf
<a href="#">RPLP/2784</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective; Consistent with national policy			<p>There has been no Sustainability Appraisal, Strategic Environmental Assessment or Habitats Regulations Assessment of the effects of the new main roads out of Wickford and across South West Billericay. The wider effects of cutting green corridor habitats should be assessed including the effects of any new landscape barriers and buffer zones proposed.</p> <p>The wider effects of the increase in, and redistribution of traffic, need to be assessed in new reports before new Sustainability assessments can be carried out.</p> <p>This is a breach of directive 2001/42/EC.</p>	RPLP- 2777 R Lazarus 7_redacted 2.pdf
<a href="#">RPLP/1202</a>	Mr Gavin Taylor				No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	To explain the above in more detail.	I have already answered on my return for SD1	



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<a href="#">RPLP/1882</a>		Gleeson Developments Ltd	Mrs Jacqueline Mulliner	Terence O'Rourke Ltd	Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	Gleeson Strategic Land have a significant interest in land within the Borough and allocated within the Plan, and consider it necessary to participate at the oral part of the examination to further elaborate on the points raised within the representations, and to discuss the evidence presented and the required changes to the Plan to make it sound.		RPLP-1844 TOR-Gleeson H17_181217 Representation.pdf RPLP-1844 TOR-Gleeson Consultation_Response_Booklet_Redacted.pdf RPLP-1844 TOR-Gleeson cover letter_Redacted.pdf
<a href="#">RPLP/2777</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective; Consistent with national policy			There has been no Sustainability Appraisal, Strategic Environmental Assessment or Habitats Regulations Assessment of the effects of the new main roads out of Wickford and across South West Billericay. The wider effects of cutting green corridor habitats should be assessed including the effects of any new landscape barriers and buffer zones proposed.  The wider effects of the increase in, and redistribution of traffic, need to be assessed in new reports before new Sustainability assessments can be carried out.  This is a breach of directive 2001/42/EC.	RPLP- 2777 R Lazarus 7_Redacted 1.pdf
<a href="#">RPLP/1883</a>		Gleeson Developments Ltd	Mrs Jacqueline Mulliner	Terence O'Rourke Ltd	Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	Gleeson Strategic Land have a significant interest in land within the Borough and allocated within the Plan, and consider it necessary to participate at the oral part of the examination to further elaborate on the points raised within the representations, and to discuss the evidence presented and the required changes to the Plan to make it sound.		RPLP-1844 TOR-Gleeson cover letter_Redacted.pdf RPLP-1844 TOR-Gleeson Consultation_Response_Booklet_Redacted.pdf RPLP-1844 TOR-Gleeson H17_181217 Representation.pdf
<a href="#">RPLP/1200</a>	Mr Gavin Taylor				No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	To explain verbally and in more detail what I have set out above	I have already answered on my return on SD1	

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<a href="#">RPLP/2556</a>	Mr Jamie Robert Melvin	Natural England								<p>Habitats Regulations Assessment</p> <p>Recreational Disturbance</p> <p>Our comments above relating to policy wording notwithstanding, Natural England commends the progress your authority and others have made with regards to mitigating impacts on the Essex Natura 2000 sites and we are confident that the Essex RAMS will safeguard the relevant designated features. We consider that the project is sufficiently progressed for us to agree with the HRA conclusion that <b>Basildon Borough Publication Local Plan will not result in adverse effects on the integrity of European sites, either alone or in-combination with other plans and projects</b> as a result of recreational impacts provided we can agree appropriate policy wording to ensure the strategy is delivered.</p> <p>Water Quality</p> <p>The HRA states that mitigation to address the uncertain effects of development on International sites is provided through Policy SD1, the strategic housing Policy H1 and Policy IMP1 which require that development is phased to align with provision of the infrastructure needed to support it. Natural England advises that, as currently worded, these policies do not offer sufficient mitigation to satisfactorily address this issue.</p> <p>We suggest that there needs to be a commitment in policy to co-operate with other utilities and service providers to ensure that appropriate capacity is available to serve new development and a clear statement that new development will only be permitted if the required capacity is available at the relevant water treatment works, including any associated sewer connections.</p> <p>Sustainability Appraisal</p> <p>We are satisfied that the SA objectives, assessment methodology and framework generally accord with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Regulations.</p>	RPLP-2544 Natural England_redacted.pdf
<a href="#">RPLP/2558</a>	Mr Jamie Robert Melvin	Natural England				No				<p>Habitats Regulations Assessment</p> <p>Recreational Disturbance</p> <p>Our comments above relating to policy wording notwithstanding, Natural England commends the progress your authority and others have made with regards to mitigating impacts on the Essex Natura 2000 sites and we are confident that the Essex RAMS will safeguard the relevant designated features. We consider that the project is sufficiently progressed for us to agree with the HRA conclusion that</p>	RPLP-2544 Natural England_redacted.pdf

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										<p><b>Basildon Borough Publication Local Plan will not result in adverse effects on the integrity of European sites, either alone or in-combination with other plans and projects</b> as a result of recreational impacts provided we can agree appropriate policy wording to ensure the strategy is delivered.</p> <p>Water Quality</p> <p>The HRA states that mitigation to address the uncertain effects of development on International sites is provided through Policy SD1, the strategic housing Policy H1 and Policy IMP1 which require that development is phased to align with provision of the infrastructure needed to support it. Natural England advises that, as currently worded, these policies do not offer sufficient mitigation to satisfactorily address this issue.</p> <p>We suggest that there needs to be a commitment in policy to co-operate with other utilities and service providers to ensure that appropriate capacity is available to serve new development and a clear statement that new development will only be permitted if the required capacity is available at the relevant water treatment works, including any associated sewer connections.</p> <p>Sustainability Appraisal</p> <p>We are satisfied that the SA objectives, assessment methodology and framework generally accord with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Regulations.</p>	
<a href="#">RPLP/2559</a>	Mr Jamie Robert Melvin	Natural England								<p>Habitats Regulations Assessment</p> <p>Recreational Disturbance</p> <p>Our comments above relating to policy wording notwithstanding, Natural England commends the progress your authority and others have made with regards to mitigating impacts on the Essex Natura 2000 sites and we are confident that the Essex RAMS will safeguard the relevant designated features. We consider that the project is sufficiently progressed for us to agree with the HRA conclusion that <b>Basildon Borough Publication Local Plan will not result in adverse effects on the integrity of European sites, either alone or in-combination with other plans and projects</b> as a result of recreational impacts provided we can agree appropriate policy wording to ensure the strategy is delivered.</p> <p>Water Quality</p> <p>The HRA states that mitigation to address the uncertain effects of development on International sites is provided through Policy SD1, the</p>	RPLP-2544 Natural England_redacted.pdf

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										<p>strategic housing Policy H1 and Policy IMP1 which require that development is phased to align with provision of the infrastructure needed to support it. Natural England advises that, as currently worded, these policies do not offer sufficient mitigation to satisfactorily address this issue.</p> <p>We suggest that there needs to be a commitment in policy to co-operate with other utilities and service providers to ensure that appropriate capacity is available to serve new development and a clear statement that new development will only be permitted if the required capacity is available at the relevant water treatment works, including any associated sewer connections.</p> <p>Sustainability Appraisal</p> <p>We are satisfied that the SA objectives, assessment methodology and framework generally accord with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Regulations.</p>	
<a href="#">RPLP/2560</a>	Mr Jamie Robert Melvin	Natural England				No				<p>Habitats Regulations Assessment</p> <p>Recreational Disturbance</p> <p>Our comments above relating to policy wording notwithstanding, Natural England commends the progress your authority and others have made with regards to mitigating impacts on the Essex Natura 2000 sites and we are confident that the Essex RAMS will safeguard the relevant designated features. We consider that the project is sufficiently progressed for us to agree with the HRA conclusion that <b>Basildon Borough Publication Local Plan will not result in adverse effects on the integrity of European sites, either alone or in-combination with other plans and projects</b> as a result of recreational impacts provided we can agree appropriate policy wording to ensure the strategy is delivered.</p> <p>Water Quality</p> <p>The HRA states that mitigation to address the uncertain effects of development on International sites is provided through Policy SD1, the strategic housing Policy H1 and Policy IMP1 which require that development is phased to align with provision of the infrastructure needed to support it. Natural England advises that, as currently worded, these policies do not offer sufficient mitigation to satisfactorily address this issue.</p> <p>We suggest that there needs to be a commitment in policy to co-operate with other utilities and service providers to ensure that appropriate capacity is available to serve new development and a clear statement that new development will only be permitted if the</p>	RPLP-2544 Natural England_redacted.pdf

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
										<p>required capacity is available at the relevant water treatment works, including any associated sewer connections.</p> <p>Sustainability Appraisal</p> <p>We are satisfied that the SA objectives, assessment methodology and framework generally accord with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Regulations.</p>	
<a href="#">RPLP/2061</a>	Miss Anna Davies	Taylor Wimpey	Mr Taylor Cherrett	Turley	No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes		<p>Sustainability Appraisal (SA)</p> <p>5.1 The SEA/SA Regulations Schedule 2(8) requires an “assessment of reasonable alternatives” and the identification of the “reasons for selecting the alternatives tested in the light of the others available.” In <i>Ashdown Forest Economic Development LLP v SSCLG and Wealden DC</i> [2014] EWHC 406 (Admin), Mr Justice Sales held (at paragraph 97) that the plan-maker should be aware “<i>The court will be alert to scrutinise its choices regarding reasonable alternatives to ensure that it is not seeking to avoid that obligation by saying that there are no reasonable alternatives or by improperly limiting the range of such alternatives which is identified.</i>”.</p> <p>5.2 It is clear that in a number of cases BBC have not adequately considered reasonable alternatives to meet this clear legal requirement.</p> <p>5.3 In relation to Chapter 6 of the Publication Local Plan (Achieving Sustainable Development), which considers the policies which seek to outline and manage the level of growth anticipated, namely Policy SD1: A Strategic Approach to Sustainable Development in Basildon Borough, the SA notes in relation to reasonable alternatives:</p> <p><i>“Despite the significant adverse effects of accommodating the scale and distribution of growth planned for in the Borough in the Publication Local Plan, it is recognised that the rate of housing delivery expected in the Plan period falls short of that considered necessary to support housing need and economic growth. Consequently, a significant adverse effect has been identified against SA objective 5 (housing) in combination with the significant positive effect identified in acknowledgement of the significant growth that has been planned for. It should be noted that if additional growth were to be accommodated within the Borough it is likely that the significant adverse effects that have been identified against the environmental SA objectives 1 (landscape, countryside and green spaces), 2 (historic environment), 3 (biodiversity) and 13 (flood risk) would be more reinforced.”</i></p> <p>5.4 This is not considered an adequate approach to the consideration of reasonable alternatives. A full assessment of the implications of the</p>	<p>RPLP-1908 Turley-Taylor Wimpey Land at Kingsmans Farm Policy H17c Part3_Redacted.pdf</p> <p>RPLP-1908 Turley-Taylor Wimpey Land at Kingsmans Farm - Policy H17c Part2.pdf</p> <p>RPLP-1908 Turley-Taylor Wimpey Land at Kingsmans Farm - Policy H17c Part1_Redacted.pdf</p> <p>RPLP-1908 Turley-Taylor Wimpey Response Booklet.pdf</p>



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										<p>Council meeting its housing need in full should be undertaken, as well as an assessment of delivering development beyond the housing need in light of the requirement of the JSP.</p> <p>5.5 An SA style assessment, as provided for the proposed policies (Table 6.2 for instance), should be undertaken for all reasonable alternatives in relation to housing need.</p> <p>5.6 We note that the Council have provided a SA assessment of the “South West Billericay High Level Development Framework” starting at page 284 of the appendices to the assessment.</p> <p>5.7 This, we understand, has considered the following reasonable alternatives:•</p> <ul style="list-style-type: none"> <li>• The High Level Development Framework by Pell Frischman;</li> <li>• Extension of the residential development in the Preferred High Level Development Framework to the west of Tye Common further south to the northern edge of Tye Common Road •</li> <li>• Extension of the residential development in the Preferred High Level Development Framework to the west of Tye Common further south to the northern edge of Tye Common Road and re-routes the new relief road along the western edge of this extension, across Tye Common Road, before turning east and running along the southern edge of the development. This preferred route of the relief road cuts off the north western corner of Frith Wood, resulting in the loss of a small area of ancient woodland.</li> </ul> <p>5.8 It is clear that from an SA perspective the proposed options score exactly the same on every single criteria as one another (save for 13, albeit it is not clear why this is not the same for all options as it relates to flood risk).</p> <p>5.9 It is therefore not clear why the Council have sought to choose an option which delivers less housing and which would have the same sustainability impact as the other options which deliver a greater level of housing, especially in the context of the unmet need.</p> <p>5.10 It is therefore considered that the SA supports the allocation of additional land at South West Billericay. In line with paragraph 47 of the Framework.</p> <p>5.11 Also, and as noted, in these representations, TW have provided robust evidence to that demonstrate Firth Wood is not ancient, as enclosed at <b>Appendix 3</b>. TW therefore ask for the SA to be updated in this respect. TW would also ask that the Council consider through the SA the alternative relief options presented by TW in Chapter 3.</p>	

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
<a href="#">RPLP/1518</a>		Orbit Homes 2020 Ltd	Miss Victoria Yeandle		Yes	Yes		Yes	Please see representations	N/A	Representations made on behalf of Orbit Homes 2020 Ltd...pdf Representations made on behalf of Orbit Homes 2020 Ltd
<a href="#">RPLP/2250</a>		Bellway Homes and Crest Nicholson	David Carlisle	AECOM	No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	<p>Yes, our clients wish to participate at the examination hearing sessions.</p> <p>The detailed points raised in our main representations raise several fundamental soundness issues that can only be addressed via main modifications should the plan be submitted without modification.</p>	<p>Our concerns with the Sustainability Appraisal (SA) report (October, 2018) are twofold -</p> <p>1) The report does not present sufficient information on reasonable alternatives. Whilst the report does present some limited information on alternatives in relation to a number of policies in isolation, it does not present information on alternatives in respect of the issue at the very heart of the plan, namely the allocation of land for housing and the spatial strategy and distribution of those sites (and their relative performance against the SA objectives).</p> <p>2) The report does not present an outline of the reasons for selecting the alternatives dealt with (as required by law and set out in the planning practice guidance). In each instance the report fails to present outline reasons to justify the range of site alternatives examined. For example, on <b>pages 57-71</b> we see a range of alternatives in relation to the matter of high-level consideration of sites. Various site alternatives are presented in <b>Figure 4.2 pg62</b>, with no explanation of why these represent the reasonable alternatives, in relation to this particular issue. The fundamental flaw with the SA process is that reasonable alternatives, in terms of alternative 'basket of sites' have not been examined in relation to the key objective at the heart of the plan, namely allocation of a package of sites to meet objectively assessed housing needs.</p> <p>1.14 The report does present information in relation to the matter of differing housing quanta, and in relation to the matter of broad distribution. The SA must test alternative growth quanta and include a series of reasonable alternatives for differing packages of sites (avoiding 'straw men' and without undue reliance on former extant policies and previous Local Plan consultations).</p> <p>1.15 The SA cannot be said to be analysis of 'reasonable alternatives' in the context of a Local Plan. It is not the role of Local Plans to simply determine a housing growth quanta figure, nor is it the role of Local Plans to simply define a broad distribution for housing growth. The approach taken by Basildon is clearly contrary to the legal requirement, which is to examine reasonable alternatives [Reg 12(2)] "taking into account the objectives and geographical scope of the plan".</p>	RPLP-2245 Bellway Homes and Crest Nicholson Local Plan representations 17 12 2018.pdf

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										<p>1.16 Clearly the geographical scope of the plan is the Local Authority area, and the key objective is to allocate a package of sites to meet objectively assessed needs, and support the achievement of wider objectives. There can be no confidence that the Council sufficiently grappled with the matter of spatial strategy ahead of preparing the Regulation 19 Local Plan, and we can conclude that stakeholders were not presented with information on genuine reasonable alternatives as part of this Regulation 19 consultation.</p> <p>1.17 The Council instead relies on an SA that deals with the policies in isolation and one high level appraisal of Policy SD1 which is almost meaningless, let alone relevant for assessing its suitability against the SA objectives without a clear comparison against other reasonable alternatives.</p>	
<a href="#">RPLP/1263</a>	Mr Matt Stokoe				Yes	No	Positively prepared; Justified; Effective	No		N/A	
<a href="#">RPLP/1266</a>	Ms Lisa Fletcher				Yes	No	Positively prepared; Justified; Effective	No		N/A	
<a href="#">RPLP/2257</a>		Scott Properties and McCarthy & Stone	Mr David Churchill	Carter Jonas	Yes	No	Effective	Yes	<p>Our representations go to the heart of the soundness and legal compliance of the Local Plan as a whole. As the representatives of the promoters to the most significant strategic allocation in the Plan, we are well placed to assist the Council in resolving the stated deficiencies.</p>	<p>The Plan has failed to identify sufficient sites in order to meet the full objectively assessed of the Borough within the stated Plan period. The Sustainability Appraisal fails to adequately assess higher growth options as part of the 'reasonable alternatives' in order to meet these needs. Policy SD1 cannot reasonably be considered to make a 'significant positive' impact to SA Objective 7 when it fundamentally fails to meet the identified housing needs of the Borough.</p> <p>The Council will need to ensure that the impact of higher growth scenarios (that both meet and exceed the OAN of the Borough) have been adequately assessed. This assessment may then inform Main Modifications to the Plan if the findings suggest these are required in order to make the Plan sound.</p> <p>Our representations highlight deficiencies in the Local Plan and Sustainability Appraisal that go to the heart of Plan Making. We wish to support the Council in ensuring the Plan is made sound and can be bought forward for adoption in the earliest possible instance.</p>	<p>RPLP-2257 Scott and M-1 - Highways Report.pdf RPLP-2257 Scott and M-2 Policy Amendments.pdf RPLP-2257 Scott and M-3 map amendments.pdf RPLP-2257 Scott and M-4 Tennis Club map.pdf RPLP-2257 Scott and M-5 Opps Constraints.pdf RPLP-2257 Scott and M-6 Masterplan Framewk.pdf RPLP-2257 Scott and M-7 Wider Context Plan.pdf RPLP-2257 Scott and McCarth letter.pdf RPLP-2257 Scott and McCarth Reg 19 Booklet.pdf</p>

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<a href="#">RPLP/1503</a>	Mr Philip Drane	Brentwood Borough Council			Yes	Yes		No	N/A	N/A	Full Brentwood Borough Council response, approved at Planning & Licensing Committee 11/12/2018 (1)
<a href="#">RPLP/2261</a>		Scott Properties and McCarthy & Stone	Mr David Churchill	Carter Jonas	Yes	No	Justified; Effective; Consistent with national policy	Yes	M Scott Properties and McCarthy & Stone are the lead promoters for land at H17b. They have a detailed knowledge of the land being promoted as part of the future development.	<p>The Plan has failed to identify sufficient sites in order to meet the full objectively assessed of the Borough within the stated Plan period. The Sustainability Appraisal fails to adequately assess higher growth options as part of the 'reasonable alternatives' in order to meet these needs. Policy SD1 cannot reasonably be considered to make a 'significant positive' impact to SA Objective 7 when it fundamentally fails to meet the identified housing needs of the Borough.</p> <p>The Council will need to ensure that the impact of higher growth scenarios (that both meet and exceed the OAN of the Borough) have been adequately assessed. This assessment may then inform Main Modifications to the Plan if the findings suggest these are required in order to make the Plan sound.</p> <p>Our representations highlight deficiencies in the Local Plan and Sustainability Appraisal that go to the heart of Plan Making. We wish to support the Council in ensuring the Plan is made sound and can be bought forward for adoption in the earliest possible instance.</p>	RPLP-2257 Scott and M-3 map amendments.pdf RPLP-2257 Scott and M-4 Tennis Club map.pdf RPLP-2257 Scott and M-5 Opps Constraints.pdf RPLP-2257 Scott and M-1 - Highways Report.pdf RPLP-2257 Scott and McCarth letter.pdf RPLP-2257 Scott and M-7 Wider Context Plan.pdf RPLP-2257 Scott and M-6 Masterplan Framewk.pdf RPLP-2257 Scott and M-2 Policy Amendments.pdf RPLP-2257 Scott and McCarth Reg 19 Booklet.pdf
<a href="#">RPLP/2260</a>		Scott Properties and McCarthy & Stone	Mr David Churchill	Carter Jonas	Yes	No	Effective	Yes	M Scott Properties will be fundamental in securing the relocation of the tennis club facilities. It supports the growth aspirations of the club and is best place to inform the requisite land to meet these needs.	<p>The Plan has failed to identify sufficient sites in order to meet the full objectively assessed of the Borough within the stated Plan period. The Sustainability Appraisal fails to adequately assess higher growth options as part of the 'reasonable alternatives' in order to meet these needs. Policy SD1 cannot reasonably be considered to make a 'significant positive' impact to SA Objective 7 when it fundamentally fails to meet the identified housing needs of the Borough.</p> <p>The Council will need to ensure that the impact of higher growth scenarios (that both meet and exceed the OAN of the Borough) have been adequately assessed. This assessment may then inform Main Modifications to the Plan if the findings suggest these are required in order to make the Plan sound.</p> <p>Our representations highlight deficiencies in the Local Plan and Sustainability Appraisal that go to the heart of Plan Making. We wish</p>	RPLP-2257 Scott and McCarth Reg 19 Booklet.pdf RPLP-2257 Scott and M-5 Opps Constraints.pdf RPLP-2257 Scott and M-7 Wider Context Plan.pdf RPLP-2257 Scott and McCarth letter.pdf RPLP-2257 Scott and M-2 Policy Amendments.pdf RPLP-2257 Scott and M-3 map amendments.pdf RPLP-2257 Scott

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										to support the Council in ensuring the Plan is made sound and can be bought forward for adoption in the earliest possible instance.	and M-4 Tennis Club map.pdf RPLP-2257 Scott and M-1 - Highways Report.pdf RPLP-2257 Scott and M-6 Masterplan Framewk.pdf
<a href="#">RPLP/1489</a>	Mr Philip Drane	Brentwood Borough Council			Yes	Yes		No	N/A	N/A	Full Brentwood Borough Council response, approved at Planning & Licensing Committee 11/12/2018
<a href="#">RPLP/344</a>	Mr Philip Davenport				Yes	Yes		No	N/A	Not applicable	
<a href="#">RPLP/1313</a>		Redcoombe Ltd	Mr David Phillips		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	To properly consider the complexity of the issues involved.	No comments to add at this stage.	Access Appraisal.pdf
<a href="#">RPLP/644</a>	Mr. Ricky Dowles				No	No	Positively prepared; Justified; Effective; Consistent with national policy	No		<p>The local plan fails to meet <b>sustainability</b> in a number of areas, specifically infrastructure, Billericay already has severe traffic problems with roads gridlocked during busy times, the roads are just not capable of sustaining any increase in traffic levels and as a town largely comprising of small residential roads there is not a viable option for upgrading them.</p> <p>The local plan does not give any serious consideration to how the issue of traffic levels can be mitigated, the proposed 'relief road' is a white elephant, it would provide no relief at all, instead it would just be a means of access to proposed developments which in turn would simply add to the problem.</p> <p>As a 'commuter' town Billericay is at capacity in terms of railway infrastructure, trains during peak times are already full, there is rarely an opportunity to get a seat on a train during rush hour, instead it is far more common to be shoehorned into a carriage or frequently have to wait for a another train that can be boarded. As far as I am aware double decker trains are not feasible and as peak hour trains are currently the maximum 12 coaches I believe a currently desperate situation would become exasperated and simply not work with an increase in commuter numbers. The local plan provides no answer to this issue.</p>	Potash Rd traffic survey July 18



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										<p>Education/Schools: The local plan contains no significant information regarding provision of school places to support the proposed increase in population of Billericay.</p> <p>Health/GP Surgeries: Again there does not appear to be much information relating to the provision of new GP surgeries to support an increased and aging population in Billericay.</p> <p><b>Habitat Regulation Assessment:</b> The local plan appears to pay lip service to the subject of habitat assessments, there are a number of sites which are deemed as being of 'low ecological interest', one of these sites (H16) I know very well and know that it supports a diverse array of wildlife, this including multiple badger setts, Dormice, bat roosts all of the aforementioned being protected and numerous other species. The councils assumptions being based on desk based assessment.</p> <p>The local plan is seriously flawed in respect of considering the need for conservation of local habitat and the many species it supports, instead the priority is land grab of valuable land in and around a desirable commuter town when the borough has plenty of alternative sites which could be developed without impact on the environment.</p>	
<a href="#">RPLP/1446</a>	Mr Daniel Trump				Yes	No	Justified; Effective; Consistent with national policy	No		<p>Larger roads (e.g. A127) are already often congested with a large number of accidents occurring.</p> <p>Local roads, particularly in Billericay were not designed for the current volumes of traffic and will be unable to cope with any increased traffic. With an increased number of cars being parked in, and using, local roads, the issue will become even worse.</p> <p>There are a proposed 2,800 new homes for Billericay but with no new jobs being created.</p> <p>There are no new Primary Schools proposed for Billericay. Road conditions around the existing Primary Schools are already dangerous due to the large numbers of pupils and associated traffic issues.</p> <p>Hospitals, G.P.'s and Health facilities are already unable to cope with the existing population. The existing issues should be remediated before any increase in demand is considered.</p> <p>The health of the population of the Borough will be negatively impacted due to loss of Green Belt and other areas of trees, increased traffic pollution (particularly around schools), delays in access to health services.</p> <p>Train capacity is already insufficient with overcrowding for a number of hours a day.</p>	

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<a href="#">RPLP/255</a>	Mr Lee Alford				No	No	Justified; Consistent with national policy	No		There is no evidence of significant infrastructure to cope with the large increase in population. There is also no need to build on the green belt when there are many houses for sale in Billericay already. The government should build new towns away from existing towns.	
<a href="#">RPLP/258</a>	Mr Lee Alford				No	No	Justified; Consistent with national policy	No		There is no evidence that any improved infrastructure will cope with the large increase in population when the current infrastructure cannot cope with the current population. There is also no need to build on the green belt when there are many houses for sale in Billericay already. The government should build new towns away from existing towns.	
<a href="#">RPLP/1517</a>	Mr Philip Drane	Brentwood Borough Council			Yes	No	Positively prepared	Yes	Brentwood Borough Council is committed to resolve this issue with Basildon Borough Council through a Statement of Common Ground. if this issue remains unresolved through this process it may be necessary for a representative of Brentwood Borough Council to participate in the oral part of the examination for this issue as a neighbouring authority.	N/A	Full Brentwood Borough Council response, approved at Planning & Licensing Committee 11/12/2018 (2)
<a href="#">RPLP/256</a>	Mr Lee Alford				No	No	Justified; Consistent with national policy	No		There is no evidence that any improved infrastructure will cope with the large increase in population when the current infrastructure cannot cope with the current population. There is also no need to build on the green belt when there are many houses for sale in Billericay already. The government should build new towns away from existing towns.	
<a href="#">RPLP/118</a>	Mr Michael Newell				No	No	Justified	No		How can this be seems as a sustainable proposal when you are looking at building on such a vast amount of green belt land and open spaces	
<a href="#">RPLP/1089</a>	Mr John Rushton				No	No	Justified	No		As stated in my representation 1, I do not believe that building on so much green belt can be called Sustainable Development', by definition of the word Sustainable.	
<a href="#">RPLP/961</a>	Mr Paul Knight				Yes	No	Justified; Effective	No		A sustainability assessment has not been conducted to support the distribution of housing. Housing has been simply allocated proportional to population rather than the ability for a town's infrastructure to support development. This is not inline with the pursuit of sustainable development that seeks to improve the conditions that people, live, work and take leisure.	

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<a href="#">RPLP/1314</a>		Redcoombe Ltd	Mr David Phillips		Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	To properly consider the complexity of the issues involved.	No further comments at this stage	Access Appraisal.pdf (1)
<a href="#">RPLP/957</a>	Mr Paul Knight				No	No	Positively prepared; Justified; Effective; Consistent with national policy	No		A sustainability assessment has not been conducted to support the distribution of housing. Housing has been simply allocated proportional to population rather than the ability for a town's infrastructure to support development. This is not inline with the pursuit of sustainable development that seeks to improve the conditions that people, live, work and take leisure.	
<a href="#">RPLP/1193</a>	Mr Gavin Taylor				No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	To be heard and explain in more depth what the Billericay landscape is like	I have already answered on my return for SD1	
<a href="#">RPLP/2549</a>	Mr Jamie Robert Melvin	Natural England								<p>Habitats Regulations Assessment</p> <p>Recreational Disturbance</p> <p>Our comments above relating to policy wording notwithstanding, Natural England commends the progress your authority and others have made with regards to mitigating impacts on the Essex Natura 2000 sites and we are confident that the Essex RAMS will safeguard the relevant designated features. We consider that the project is sufficiently progressed for us to agree with the HRA conclusion that <b>Basildon Borough Publication Local Plan will not result in adverse effects on the integrity of European sites, either alone or in-combination with other plans and projects</b> as a result of recreational impacts provided we can agree appropriate policy wording to ensure the strategy is delivered.</p> <p>Water Quality</p> <p>The HRA states that mitigation to address the uncertain effects of development on International sites is provided through Policy SD1, the strategic housing Policy H1 and Policy IMP1 which require that development is phased to align with provision of the infrastructure needed to support it. Natural England advises that, as currently worded, these policies do not offer sufficient mitigation to satisfactorily address this issue.</p>	RPLP-2544 Natural England_redacted.pdf

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										<p>We suggest that there needs to be a commitment in policy to co-operate with other utilities and service providers to ensure that appropriate capacity is available to serve new development and a clear statement that new development will only be permitted if the required capacity is available at the relevant water treatment works, including any associated sewer connections.</p> <p>Sustainability Appraisal</p> <p>We are satisfied that the SA objectives, assessment methodology and framework generally accord with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Regulations.</p>	
<a href="#">RPLP/1544</a>		Kentucky Fried Chicken (Great Britain) Limited	Steve Simms	SSA Planning Limited	Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	Because it may be necessary to discuss any additional evidence that the LPA may provide.	No comments.	
<a href="#">RPLP/1184</a>	Mr Patrick McGreal				No	No	Positively prepared; Justified	No		No comment	
<a href="#">RPLP/122</a>	Mrs Angela Beckett				No	No	Positively prepared; Justified; Effective; Consistent with national policy	No		Insufficient infrastructure. Overcrowding. Loss of green belt. Transport network insufficient, also roads. No work for new residents. Property not affordable to local people.	
<a href="#">RPLP/2827</a>	Mr Bernard Thomas					No	Effective	No		<p>The whole plan is not sustainable</p> <p>2745 houses - 8 employment spaces. 25%increase - Ludicrous</p> <p>To convert the Radford crescent car park will further the problem for railway parking -the station car park is already jam-packed and the trains are worse.</p> <p>H17a (540 homes) these properties will need car transport, for employment, school runs and medical needs. these extra cars will <u>totally</u> grid-lock the gooseberry green roundabout and London road exit from mounnessing road and the railway bridge is narrow and very dangerous - definitely not acceptable.</p>	RPLP-2827 B Thomas_Redacted.pdf

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
										Schools, doctors, parking, hospital appointments will be utterly and completely inundated. Those plans need to be re-thought before a natural disaster or a breakdown of all services occur.  Billericay is already at maximum capacity for all services!!!	
<a href="#">RPLP/2632</a>	Mrs Jacqueline Thomas					No	Effective	No		building more & more dwellings with no thought catastrophic consequences re. roads medical accessibility already overcrowded trains , schools etc. is ludicrous get the infrastructure organised first	RPLP-2632 J Thomas_Redacted.pdf
<a href="#">RPLP/1847</a>		Gleeson Developments Ltd	Mrs Jacqueline Mulliner	Terence O'Rourke Ltd	No			Yes	Gleeson Strategic Land have a significant interest in land within the Borough and allocated within the Plan, and consider it necessary to participate at the oral part of the examination to further elaborate on the points raised within the representations, and to discuss the evidence presented and the required changes to the Plan to make it sound.	<p>Sustainability Appraisal</p> <p>7.52 As set out at section 3, Policy H17 of the Local Plan includes provision of a link road for Billericay and the Plan identifies a corridor from the A129/London Road heading towards Brentwood, south eastwards to the junction of the B1007/Laindon Road with A176/Noak Hill Road, utilising Frithwood Lane from its junction with Tye Common Road to development parcel H17d.</p> <p>7.53 The Sustainability Appraisal refers at paragraphs 4.47 and 4.48 to an alternative route for the link road which was accepted by the Council in December 2017 and was to be allocated as an option in the Plan until the Council's Infrastructure, Growth and Development Committee on 19 March 2018 rejected that route.</p> <p>7.54 Whilst the proposed route forming part of the allocation is deliverable, as demonstrated at section 3 of these representations, there are potential alternative options for a link road route. These options have yet to be fully explored in detailed technical terms but in principle are known, have been subject to 'in principle' testing and could be delivered.</p> <p>7.55 However, the Sustainability Appraisal and Strategic Environmental Assessment published alongside the Plan do not consider or test these reasonable alternative link road routes. forming part of Policy H17.</p> <p>7.56 The assessment does not therefore comply with the requirement under the Environmental Assessment of Plans and Programmes Regulations (2004) which require an assessment of reasonable alternatives and the identification of reasons for selecting the alternatives tested in light of others available.</p> <p>7.57 The appraisal at Appendix 2 provides a proportionate assessment of the relative merits of the routes, which should be reflected in the Sustainability Appraisal to assist in justifying the plan – preferably to enable further testing at application stage, in the knowledge that all of the options are deliverable.</p>	RPLP-1844 TOR-Gleeson H18_181217 Representation.pdf RPLP-1844 TOR-Gleeson Consultation_Response_Booklet_Redacted.pdf RPLP-1844 TOR-Gleeson cover letter_Redacted.pdf

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
<a href="#">RPLP/441</a>	Ms christine wade				Yes	No	Justified; Effective; Consistent with national policy			There is limited information for these points on all the sites. The route of the relief road H17 raises a number of habitat/ ancient forest land issues which have not been satisfactorily covered.	
<a href="#">RPLP/440</a>	Ms christine wade				Yes	No	Justified; Effective; Consistent with national policy			There is limited information for these points on all the sites. The route of the relief road H17 raises a number of habitat/ ancient forest land issues which have not been satisfactorily covered.	
<a href="#">RPLP/442</a>	Ms christine wade				Yes	No	Justified; Effective; Consistent with national policy			There is limited information for these points on all the sites. The route of the relief road H17 raises a number of habitat/ ancient forest land issues which have not been satisfactorily covered.	
<a href="#">RPLP/47</a>	Miss Sarah Green				Yes	No	Justified; Effective; Consistent with national policy	No	N/A	N/A	
<a href="#">RPLP/77</a>	Mr James Moran				No	No	Justified; Consistent with national policy	No		Any sustainability analysis must have been very limited as it simply could not have taken into account the already full commuter route out of Billericay station, which cannot take much more.	
<a href="#">RPLP/72</a>	Mrs Chrystal Weatherley				No	No	Effective	No		Building these houses will significantly reduce our green belt and change the whole feel of Billericay. Changes should be made to make improvements, not to the detriment of the local residence. Who will be buying this new houses as no doubt it will be priced too high for first time buyers living in Billericay. What about our local habitat?	
<a href="#">RPLP/613</a>	Mr David Crest				No	No	Justified; Consistent with national policy	No		When I click on the link it just takes me back to the homepage. How can I comment?	
<a href="#">RPLP/327</a>	Mrs Sarah Wilson				Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	No		<ul style="list-style-type: none"> <li>ancient market town geography not suitable to improve transport links required for increased population</li> <li>limited opportunities for new population to access jobs generated from small town hub</li> <li>schools already having to expand using up vital green areas to accommodate current demand</li> <li>secondary schools do have large village catchments already so would struggle with more numbers</li> <li>GP'S over subscribed</li> <li>planned loss of over 50% green belt in borough leads to lung of area diminished hence higher pollution</li> </ul>	



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										<ul style="list-style-type: none"> <li>ancient woodlands and large wildlife population will have their routes for maintaining ecology disrupted</li> </ul>	
<a href="#">RPLP/815</a>	Mr David Cooper				No	No	Positively prepared; Justified; Effective; Consistent with national policy	No		<p>I have already mentioned this above, however:</p> <p>The amount of construction suggested for areas H17 and H18 is unfounded and should be re-sited. This land is sustainable farmland and protected Green Belt. It also offers some of the best views and walks around the Billericay area and offers much needed natural habitat for wildlife. There is also reports of badger's sets within this area that cannot be destroyed. This area is also prone to flooding. Millions of pounds would need to spent to make it a viable area for such mass construction and this can only be reflected in the price of the housing. It is very poor use of the Green Belt and is unsound due to the fact that all of H17 is sustainable farmland. Building on H17 is making very poor use of this land, is not sustainable and goes against 'strategic objective 12'.</p>	RPLP-815 Cooper_Redacted.pdf
<a href="#">RPLP/152</a>	Mrs Joanna Rhule				Yes	No	Justified	No		<p><b>The North</b></p> <ul style="list-style-type: none"> <li>H16 Potash Road</li> </ul> <p>- Environmental - no consideration of the high probability that rare dormice and badgers are present. Potential for many established trees to be lost. - A long distance from the High Street and other services leading to high car use</p> <p><b>The South-West</b></p> <ul style="list-style-type: none"> <li>H17a – Mountnessing Road</li> </ul> <p>- Accessible countryside lost</p> <ul style="list-style-type: none"> <li>- H17b – London Road (including cricket and tennis clubs)</li> </ul> <p>- Accessible countryside lost</p> <ul style="list-style-type: none"> <li>H17d – Frithwood Lane</li> </ul> <p>- Loss of an accessible 'Green Wedge' close to the high street. - Immediately adjacent to High Street (architectural) conservation area. - Close to Little Burstead (architectural) conservation area - Lack of green buffer towards Little Burstead - potential for sprawl and coalescence - Possible archaeological sites - Ecologically sensitive, adverse impact on wildlife and setting of nearby Frith Wood and Laindon Common.</p> <ul style="list-style-type: none"> <li>H18 - Windmill Heights</li> </ul>	

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										<p>-Would aggravate existing flood problems in the Kennel Lane\Church road area. <b>The South-East</b></p> <ul style="list-style-type: none"> <li>• H19 a&amp;b Greens Farm Lane</li> </ul> <p>- Would significantly narrow the wildlife corridor between Mill Meadows and the wider countryside - Impact on Greens Farm Lane and Outwood Common Road - Little protection for important hedgerows</p> <ul style="list-style-type: none"> <li>• H20 – Southend Road, South Green</li> </ul> <p>- Little protection for important hedgerows.</p> <ul style="list-style-type: none"> <li>• H21c – The Mount, adjacent to Norsey Wood</li> </ul> <p>- Adjacent to Norsey Wood which is an Ancient Woodland and SSSI</p>	
<a href="#">RPLP/157</a>	Mr Alan Hayman				Yes	No	Effective			With significant capacity increases required to all infrastructure systems (transport, gas, electric, water and sewerage) there is nothing sustainable about the developments. Huge losses of green belt land will clearly have a negative impact on the habitat of local wildlife, some of which is already on endangered lists.	
<a href="#">RPLP/560</a>	Mr Robert Bunting				Yes	No	Justified; Effective	No		Will lead to a significant loss of green belt	
<a href="#">RPLP/570</a>	mr Paul Robinson				Yes	No	Justified; Effective; Consistent with national policy	No	N/A	Nil	
<a href="#">RPLP/766</a>	mr neil garnett				No	No	Justified	No		no comment	
<a href="#">RPLP/1191</a>	Mr Gavin Taylor				No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	I would like to present as i feel very strongly that Billericay is taking an unfair burden on building houses that are not for locals, will not help the economy, and will cause pollution and social issues because we cannot accommodate this level of building!	<p>If this local Plan is passed in its current form, the habitat of both residents and wildlife will change for the worst forever.</p> <p>Basildon Council is in discussions with other neighbouring Councils and intend to build over 90,000 homes in South Essex. As we have seen in Chelmsford the Councils are less willing to make proper investment into infrastructure and therefore blight everyones lives. The politicians need to look seriously at teh population growth and look at other parts of the country to invest in.</p>	

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<a href="#">RPLP/1418</a>	Mrs Deborah Taylor				No	No	Positively prepared; Justified; Consistent with national policy	No		The Local Plan will ruin my habitat. I chose to live in a rural part of the country and this plan will ruin it forever.  The wildlife will be destroyed by the building and any surviving will probably die because of the pollution.	
<a href="#">RPLP/929</a>	Mr Malcolm Bull				Yes	No	Justified	No		There is already pressures on water supplies in this area and further developments will add to this. Very real risk of water shortages in the summer months. Green belt needs protecting not building on.	
<a href="#">RPLP/1388</a>	Mr Derek Webb				Yes	No	Justified	No		There does not seem to be any additional supporting evidence for sustainability, this just re-iterates the requirement for a large number of jobs and houses, the only justification seems to be that the council does not want to form a conurbation between Basildon and Thundersley which I have no issue with, but the sole answer seems to be to build on green belt land with no mention of any plans to improve the infrastructure in Billericay such as water supply and sewage capacity, local road capacity, vehicle parking capacity, none of the new jobs will be in Billericay yet a large percentage of the new homes will be built there, no new doctors' surgeries, hospitals, dentists etc. or schools are proposed to support the huge increase in population so I think that the assessment does not answer or address the concerns of the residents of Billericay.	
<a href="#">RPLP/953</a>	Mrs Linda Jewell				No	No	Justified	No		This plan is not sustainable due to the lack of infrastructure and encroachment upon the green belt.	
<a href="#">RPLP/1048</a>	Mr Len Willis				Yes	No	Positively prepared	No		I feel that the plan is not sustainable as existing resources are already overburdened.	
<a href="#">RPLP/1178</a>	Mr Matt Stokoe				Yes	No	Justified; Effective; Consistent with national policy	No		N/A	
<a href="#">RPLP/1296</a>	Ms Lisa Fletcher				Yes	No	Effective; Consistent with national policy	No		N/A	
<a href="#">RPLP/1180</a>	Mr Simon Mackenzie				No	No	Justified; Effective; Consistent with national policy	No		Many of the arguments do not make sense to me. I do not believe new housing will be any more 'affordable' than existing housing stock. I cannot see any conditions for improved employment opportunities one the building is completed. Rather there will be more demands on commuting infrastructure as people seek employment elsewhere. Roads are already heavily congested, particularly around the train station and high street. Additional population will only make this worse. Trains are already at capacity at peak times and are already frequent so extra passengers all down the line will add to the misery for existing commuters. Parking will be a problem as any new	

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										residents will need to find ways to get in to the town from these new developments on the outskirts.	
<a href="#">RPLP/1299</a>	Mrs Janette Joshi				Yes	No	Justified	No	n/a	n/a	Tweet from Councillor Allport Hodge (at the time) agreeing that the plan would not only ruin Billericay, but the whole Borough!
<a href="#">RPLP/650</a>	Mr Daniel Freeman				Yes	No	Justified	No		It's Green Belt. Any building will damage local ecosystems.	RPLP-650 Freeman_Redacted.pdf
<a href="#">RPLP/1291</a>	Mr Jeffrey Fairfull				Yes	No	Consistent with national policy	No		These plans will result in a reduction in wildlife habitat and wildlife corridors. It will result in urban sprawl and a severe reduction in Green Belt open land which currently provides significant and essential benefits to residents old and new alike. It will result in a substantial reduction in quality of life for all concerned.	
<a href="#">RPLP/1528</a>	mr alan jones				No	No	Effective	Yes	I think this is the only way anyone will actually take any notice of the depth of feeling. Having attended the council planning meetings, I was staggered by the manner in which councillors, (some of whom have since resigned) completely ignored any views raised and were determined to vote through their plans, regardless of the opposing views of the residents	i think they are nonsense	
<a href="#">RPLP/954</a>	Mrs Pamela Atkinson				Yes	No	Justified	No		As a local walker I am very concerned at the loss of green areas in a small town.  As an ex teacher I am concerned about the number of places available for senior school students should the population increase by 25%.  As a resident I am anxious about the relief road clogging up The Tye common area which is already a rat run from the A127.	

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										As a Shopper and driver the impact on a small town will be chaotic parking.	
<a href="#">RPLP/1521</a>	Mr Philip Drane	Brentwood Borough Council			Yes	No	Positively prepared	Yes	Brentwood Borough Council is committed to resolve this issue with Basildon Borough Council through a Statement of Common Ground. if this issue remains unresolved through this process it may be necessary for a representative of Brentwood Borough Council to participate in the oral part of the examination for this issue as a neighbouring authority.	N/A	Full Brentwood Borough Council response, approved at Planning & Licensing Committee 11/12/2018 (3)
<a href="#">RPLP/2601</a>	Mr Roland Lazarus				No	No	Justified; Effective; Consistent with national policy	Yes	I am willing to support my case against the councils position should they contest it.	At the Draft Local Plan Stage Alternative 2 to the proposal for H20 land west of Tye Common Road was for at least 360 new homes (The H20 allocation was 160). The Sustainability Assessment was not done for 360 - alternative 2 with the explanation given that it was not a reasonable alternative. we now look at a Revised Publication Local Plan with around 350 new homes for Land West of Tye Common Road H17c.  We have been denied sight of a Sustainability Appraisal or Strategic Environmental Assessment at Regulation 18.  This was a breach of Directive 2001/42/EC	RPLP-2594 R Lazarus 3_Redacted 2.pdf
<a href="#">RPLP/2245</a>		Bellway Homes and Crest Nicholson	David Carlisle	AECOM	No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	Yes, our clients wish to participate at the examination hearing sessions.  The detailed points raised in our main representations raise several fundamental soundness issues that can only be addressed via main modifications should the plan be submitted without	Our concerns with the Sustainability Appraisal (SA) report (October, 2018) are twofold -  1) The report does not present sufficient information on reasonable alternatives. Whilst the report does present some limited information on alternatives in relation to a number of policies in isolation, it does not present information on alternatives in respect of the issue at the very heart of the plan, namely the allocation of land for housing and the spatial strategy and distribution of those sites (and their relative performance against the SA objectives).  2) The report does not present an outline of the reasons for selecting the alternatives dealt with (as required by law and set out in the planning practice guidance). In each instance the report fails to present outline reasons to justify the range of site alternatives examined. For example, on <b>pages 57-71</b> we see a range of alternatives in relation to the matter of high-level consideration of	RPLP-2245 Bellway Homes and Crest Nicholson Local Plan representations 17 12 2018.pdf

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									modification.	<p>sites. Various site alternatives are presented in <b>Figure 4.2 pg62</b>, with no explanation of why these represent the reasonable alternatives, in relation to this particular issue. The fundamental flaw with the SA process is that reasonable alternatives, in terms of alternative 'basket of sites' have not been examined in relation to the key objective at the heart of the plan, namely allocation of a package of sites to meet objectively assessed housing needs.</p> <p>1.14 The report does present information in relation to the matter of differing housing quanta, and in relation to the matter of broad distribution. The SA must test alternative growth quanta and include a series of reasonable alternatives for differing packages of sites (avoiding 'straw men' and without undue reliance on former extant policies and previous Local Plan consultations).</p> <p>1.15 The SA cannot be said to be analysis of 'reasonable alternatives' in the context of a Local Plan. It is not the role of Local Plans to simply determine a housing growth quanta figure, nor is it the role of Local Plans to simply define a broad distribution for housing growth. The approach taken by Basildon is clearly contrary to the legal requirement, which is to examine reasonable alternatives [Reg 12(2)] <i>"taking into account the objectives and geographical scope of the plan"</i>.</p> <p>1.16 Clearly the geographical scope of the plan is the Local Authority area, and the key objective is to allocate a package of sites to meet objectively assessed needs, and support the achievement of wider objectives. There can be no confidence that the Council sufficiently grappled with the matter of spatial strategy ahead of preparing the Regulation 19 Local Plan, and we can conclude that stakeholders were not presented with information on genuine reasonable alternatives as part of this Regulation 19 consultation.</p> <p>1.17 The Council instead relies on an SA that deals with the policies in isolation and one high level appraisal of Policy SD1 which is almost meaningless, let alone relevant for assessing its suitability against the SA objectives without a clear comparison against other reasonable alternatives.</p>	
<a href="#">RPLP/1176</a>	Miss Emma Taylor				No	No	Positively prepared; Justified; Effective; Consistent with national policy	No		<p>The local plan is going to completely ruin the local habitat. We chose to live in a rural part of the country and if this plan is successful then it will ruin it forever.</p> <p>The borough is working with other local authorities on a joint spacial plan is south Essex which will deliver at least 90,000 and 58,000 jobs, what it doesn't say is how this will be achieved how the boroughs will be able to cope with these figures and find sufficient jobs.</p>	



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										I am very worried about the continual sticking plasters put within every borough where the authorities should be looking at a completely new town with it's own comprehensive infrastructure.	
<a href="#">RPLP/1177</a>	Ms Lisa Fletcher				Yes	No	Justified; Consistent with national policy	No		N/A	
<a href="#">RPLP/1188</a>	Mr Lee Joyce				Yes	No	Justified; Effective	No		The Plan has not efficiently considered the current infrastructure status and traffic flow issues in Billericay. Notably traffic monitoring was conducted during school holidays for example and the proposal to make Norsey Road one way away from the High Street is unsound having failed a trial in 2005. The plan for new homes is not supported by a plan for new jobs. Train and road capacity is already exceeded. Schools are significantly oversubscribed and GP appointments are hard to get on the day needed. In short, whilst accepting a national need for houses, a plan that has no regard to the impact on current residents and their infrastructure and no plan sound or otherwise for improved infrastructure is illustrative of the wholly inadequate and unsound appraisal of the sustainability of the plan. It is shortsighted at best and will come at a huge cost in terms of countryside access for many.	
<a href="#">RPLP/1588</a>	Mrs Allison Faux				Yes	No	Justified; Effective; Consistent with national policy	No		The proposed site is a wildlife haven with badgers foxes and a protected dormouse.	
<a href="#">RPLP/1856</a>		Gleeson Developments Ltd	Mrs Jacqueline Mulliner	Terence O'Rourke Ltd	Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	Gleeson Strategic Land have a significant interest in land within the Borough and allocated within the Plan, and consider it necessary to participate at the oral part of the examination to further elaborate on the points raised within the representations, and to discuss the evidence presented and the required changes to the Plan to make it sound.		RPLP-1844 TOR-Gleeson Consultation_Response_Booklet_Redacted.pdf RPLP-1844 TOR-Gleeson cover letter_Redacted.pdf RPLP-1844 TOR-Gleeson H17_181217 Representation.pdf
<a href="#">RPLP/3161</a>	Pauline Bowles	Little Burstead Parish Council			Yes	No	Justified; Effective; Consistent with national policy	No		Not applicable - none given.	RPLP - 3161 Bowles - Little Burstead_redacted.pdf

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<a href="#">RPLP/3277</a>	Mrs Pat Brown				Yes	No	Justified; Effective; Consistent with national policy	No		Greenbelt should be used for what it is intended! People to enjoy, to preserve plants, trees, animals insects & birds.  Once the greenbelt is removed you cannot "get it back". The contents cannot be removed & put elsewhere they will simply be lost forever. Councils do not have to build on green belt, Billericay does not want to lose its green belt.	RPLP-3274 Brown_Redacted.pdf
<a href="#">RPLP/3281</a>	Mrs Pat Brown				Yes	No	Justified; Effective; Consistent with national policy	No		Greenbelt should be used for what it is intended! People to enjoy, to preserve plants, trees, animals insects & birds.  Once the greenbelt is removed you cannot "get it back". The contents cannot be removed & put elsewhere they will simply be lost forever. Councils do not have to build on green belt, Billericay does not want to lose its green belt.	RPLP-3274 Brown_Redacted.pdf
<a href="#">RPLP/4677</a>	Mrs Jacqueline Burrige				Yes	No	Justified; Effective; Consistent with national policy	No		Green Belt should be used for what it is intended! People to enjoy, to preserve plants, trees, animals insects and birds. Once the green belt is removed you cannot get it back. The contents cannot be removed and put elsewhere they will simply be lost forever. Councils do not have to build on green belt, Billericay does not want to lose its green belt.	RPLP- 4538 Burrige_redacted.pdf
<a href="#">RPLP/2280</a>	Dr Paul Bailey				Yes	No	Justified	No		The sustainability appraisal is laughable. As an Architect, working in practice, I see no evidence of just cause for the further disruption of the environment for financial gain.	RPLP - 2280 Bailey_Redacted.pdf
<a href="#">RPLP/4193</a>	Mrs Brenda Allaker					No	Justified	No		We should be meeting the needs of the present without compromising the ability of future ,. generations, effectively our schools are filled to the maximum. We do not need to jeopardise, their future. I would suggest possibly building another school on one of these sites instead of houses. We need to prevent Billericay becoming overpopulated. Please note: Not all residents of Billericay are able to voice their opinions on-line or in writing mainly because they do not have access to internet or are not in the position to complete the forms. This isn't a fair representation of our thoughts as a total community. There should be a way of perhaps arranging meetings for those less able in these circumstances.	RPLP- 4193 B Allaker_redacted.pdf
<a href="#">RPLP/2258</a>		Scott Properties and McCarthy & Stone	Mr David Churchill	Carter Jonas	Yes	No	Positively prepared; Justified; Consistent with national policy	Yes	As the promoters of site H17b, M Scott Properties and McCarthy & Stone are ideally positioned to evidence the ability of the site to begin delivering within the first five years of the Plan.	The Plan has failed to identify sufficient sites in order to meet the full objectively assessed of the Borough within the stated Plan period. The Sustainability Appraisal fails to adequately assess higher growth options as part of the 'reasonable alternatives' in order to meet these needs. Policy SD1 cannot reasonably be considered to make a 'significant positive' impact to SA Objective 7 when it fundamentally fails to meet the identified housing needs of the Borough.  The Council will need to ensure that the impact of higher growth scenarios (that both meet and exceed the OAN of the Borough) have been adequately assessed. This assessment may then inform Main	RPLP-2257 Scott and M-3 map amendments.pdf RPLP-2257 Scott and M-7 Wider Context Plan.pdf RPLP-2257 Scott and M-6 Masterplan Framewk.pdf RPLP-2257 Scott and M-5 Opps Constraints.pdf RPLP-2257 Scott and M-1 - Highways

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										<p>Modifications to the Plan if the findings suggest these are required in order to make the Plan sound.</p> <p>Our representations highlight deficiencies in the Local Plan and Sustainability Appraisal that go to the heart of Plan Making. We wish to support the Council in ensuring the Plan is made sound and can be bought forward for adoption in the earliest possible instance.</p>	<p>Report.pdf RPLP-2257 Scott and McCarth Reg 19 Booklet.pdf RPLP-2257 Scott and McCarth letter.pdf RPLP-2257 Scott and M-4 Tennis Club map.pdf RPLP-2257 Scott and M-2 Policy Amendments.pdf</p>
<a href="#">RPLP/2950</a>	Mrs Carolyn Chappell				Yes	No	Justified; Consistent with national policy	No		<p>I don't believe anything has been adequately thought out beyond need for new houses.</p> <p>It is not sustainable on all levels</p> <p>pollution</p> <p>congestion</p> <p>local infrastructure</p> <p>local facilities</p>	RPLP-2950 C Chappell_redacted1.pdf
<a href="#">RPLP/3284</a>	Mrs Pat Brown				Yes	No	Justified; Effective; Consistent with national policy	No		<p>Greenbelt should be used for what it is intended! People to enjoy, to preserve plants, trees, animals insects &amp; birds.</p> <p>Once the greenbelt is removed you cannot "get it back". The contents cannot be removed &amp; put elsewhere they will simply be lost forever. Councils do not have to build on green belt, Billericay does not want to loose its green belt.</p>	RPLP-3274 Brown_Redacted.pdf
<a href="#">RPLP/4754</a>	Mr Dennis Lebeau				No	No	Justified; Consistent with national policy	No		The only properties being built in Billericay are very expensive and also impede on facilities already present everywhere.	RPLP-4754 D Lebeau_redacted.pdf
<a href="#">RPLP/4734</a>	Miss Dionne Allaker					No	Justified	No		<p>These extra houses will make Billericay overpopulated, there will be no countryside left for the present residents to enjoy. There is no thought for the current residents; the future generation will not enjoy living in such an overcrowded area. We need more schools built or more doctor's surgeries or maybe a new hospital to cope with the amount of people in the area already not more houses. There is not one good thing to come out of this development. I would also like to add what happens to the people's opinions that don't have access to the internet or a printer or they may not be able to complete this form. Surely that means a lot of peoples voices are not being heard.</p>	RPLP-4734 D Allaker_redacted.pdf

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<a href="#">RPLP/1343</a>	Mrs Catherine Bannister				No	No	Justified	No		<p>An increase in housing will not be sustainable for the town. I feel it will drive people away from the town centre, due to lack of parking (already at a premium) and over crowded shops (especially supermarkets). Residents will look to show away from the town and this will result in a failing town centre with local retailers facing inflated rentals and eventually closing leaving behind an unused and forlorn High Street with many empty units. Billericay currently manages to provide a wealth of local retailers and restaurants and brings people in from around the area (not just Billericay).</p> <p>Public Transport for Billericay is already overcrowded. Extra housing being provided further down the Southend Victoria line will further exacerbate this issue. What increase in capacity can be provided for the rain link - not sure this has been adequately investigated. Another 2000+ commuters cannot be accommodated on the trains. Additional cars on the roads will also lead to additional pollution, traffic accidents, noise and hold ups and also highlight the lack of High Street parking.</p> <p>Very upsetting to see Green Belt land turned over to unnecessary housing. This will cause poorer air quality, a poorer environment for residents and lack of concern for all wildlife. There will also be more noise and light pollution which is also unhealthy not just for residents but wildlife too.</p> <p>Lack of adequate planning for Health and schools. Already extremely hard to be registered for a local doctors and this includes making appointments. 2000+ more residents cannot be accommodated with just one new surgery. Lack of planning for all of our health issues is frightening. The main accident and emergency hospital at Basildon is already struggling with the current population. Many departments are falling way below national averages. Do we want to apply further pressure and push the hospital to fail and be put under special measures putting locals under risk.</p> <p>The schools are also at capacity. All primary and infant schools should be within walking distance of it's pupils. Already there are many children having to be driven to schools which are not local to them in order to have a place available. Lack of meaningful planning for the many additional children within this new housing plan.</p> <p>How will the Utilities cope for these extra 2000+ houses. Water was already low during the summer with pressures turned down to help conserve water. with these extra houses how will the local water companies cope. This will probably lead to higher prices in the area, more likelihood of hosepipe bans in the warmer summers and even slower responses to leaks.</p> <p>Road surfaces and upkeep is already poor in the area. Many potholes are reported but take months to be fixed. With increased traffic this will</p>	

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										<p>only deteriorate the road surfaces and cause further problems and an increased expenditure for the council to maintain transport links.</p> <p>There are many current residents who will be looking to move out of the area should these housing plans be agreed. The town will change out of all recognition and lose a lot of it's historic character and charm.</p>	
<a href="#">RPLP/2544</a>	Mr Jamie Robert Melvin	Natural England								<p>Habitats Regulations Assessment</p> <p>Recreational Disturbance</p> <p>Our comments above relating to policy wording notwithstanding, Natural England commends the progress your authority and others have made with regards to mitigating impacts on the Essex Natura 2000 sites and we are confident that the Essex RAMS will safeguard the relevant designated features. We consider that the project is sufficiently progressed for us to agree with the HRA conclusion that <b>Basildon Borough Publication Local Plan will not result in adverse effects on the integrity of European sites, either alone or in-combination with other plans and projects</b> as a result of recreational impacts provided we can agree appropriate policy wording to ensure the strategy is delivered.</p> <p>Water Quality</p> <p>The HRA states that mitigation to address the uncertain effects of development on International sites is provided through Policy SD1, the strategic housing Policy H1 and Policy IMP1 which require that development is phased to align with provision of the infrastructure needed to support it. Natural England advises that, as currently worded, these policies do not offer sufficient mitigation to satisfactorily address this issue.</p> <p>We suggest that there needs to be a commitment in policy to co-operate with other utilities and service providers to ensure that appropriate capacity is available to serve new development and a clear statement that new development will only be permitted if the required capacity is available at the relevant water treatment works, including any associated sewer connections.</p> <p>Sustainability Appraisal</p> <p>We are satisfied that the SA objectives, assessment methodology and framework generally accord with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Regulations.</p>	RPLP-2544 Natural England_redacted.pdf

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<a href="#">RPLP/2586</a>	Mr Roland Lazarus					No	Positively prepared; Effective; Consistent with national policy			Population density data and IMD data should be incorporated into the Sustainability Appraisal.  Baseline air quality data is required for all areas of the borough and for the range of pollutants in the air. This baseline air quality data should be incorporated into the S.A and S.E.A - The minimal result from nitrous dioxide testing alone and in one summer month only once is not sufficient. This information should then inform the need to make changes to the distribution and amount of development and or mitigation required.	RPLP-2538 R Lazarus 2_Redacted 5.pdf
<a href="#">RPLP/204</a>	Mr Richard Harris				Yes	No	Justified	No		I believe the allocation for Billericay and across the borough should be based on a proper sustainability analysis.	
<a href="#">RPLP/48</a>	Mr Christopher Wooldridge				No	No	Positively prepared; Justified; Effective; Consistent with national policy	No		Please refer to previous comments	
<a href="#">RPLP/218</a>	Mrs Kate Lotts				Yes	No	Positively prepared	No		See comments under Section B	
<a href="#">RPLP/614</a>	Mr David Crest				No	No	Consistent with national policy	No		When I click on the link it just takes me back to the homepage. How can I comment?	
<a href="#">RPLP/646</a>	Mr. Ricky Dowles				No	No	Positively prepared; Justified; Effective; Consistent with national policy	No		Already commented	
<a href="#">RPLP/606</a>	mrs helen degrove				Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	No		The greenbelt which will be lost under planned building sites H17c and d sits next to the ancient woodland that is the habitat of green woodpeckers that breed there and are under amber preservation status. Building next to this area will affect their habitat. There are also many owls that have found sanctuary in the woods and will be affected by the building up of the area. The greenbelt also provides some natural defence against pollution that is rife around more built up areas. Residents move here because of the health aspect of land around their housing. Peoples health will be affected by the proposed excessive housing number plans and the infrastructure plans are not adequate - busier trains - that are already packed, busier doctors surgeries as asthma sufferers become more affected due to the pollution of more cars because of more housing and residents in an already adequately built up area	



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<a href="#">RPLP/208</a>	Mr Richard Harris				Yes	No	Justified	No		Building on green belt can never be sustainable.	
<a href="#">RPLP/875</a>	Mr Barry Durrant				Yes	No	Justified; Effective; Consistent with national policy	No	I do not wish to participate.	No comments	
<a href="#">RPLP/1019</a>	Mr Ian Woodman				Yes	No	Justified; Effective; Consistent with national policy	No		<p>Waste recycling not clear. How will the housing estates be designed to ensure there are no waste bins that become unsightly and dangerous street clutter? Recycling bins located so they are on the highway is unsightly and attracts vermin and foxes. Appropriate storage / bin cupboards should be constructed as part of the property especially with the recycling Basildon district council now implement.</p> <p>What SUDS is being provided for the development, rainwater harvesting, rainwater attenuation, etc...The capacities of the sewers are restricted and how will the development react to climate change and prevent surcharging of the sewers and flooding occurring. Is the development providing a storm water reservoir?</p> <p>This is greenbelt and is still being lost and overdeveloped. There are other Brownfield developments in Essex and Billericay that can be used and should be used before any Greenbelt is even considered for Housing development. There is no acceptable justification or evidence that supports the loss of greenbelt land.</p> <p>There is no proposed new Parks for families / children / Adults to use for the developments. With the proposed housing south of the railway line there is a need for a new park to serve that area as Lake Meadows Park is unsuitable for the increased population as there is not sufficient car parking and its times are restricted due to close proximity to the station. If people of south Billericay use Lake Meadows it will bring more traffic pollution and congestion / gridlock to that area especially the road to Lake Meadows is shared by the industrial estate as well. The developments will not be built for the local residents of Billericay with affordable house and permit Billericay residents to remain in the town. This is not a sustainable proposal for the people sustainability. We know this as the developers will look to maximise their profit margins and not give anything back to the town as the council and government will let them get away with it and not enforce any pre-development planning conditions or agreements. The sites may be of Archaeological interest. Has a report been commissioned and work carried out prior to any development? How do you know the site is not contaminated? Has a report been commissioned? There are no proposals for the sustainable movement of people. No cycle paths are proposed. No charging points for electric vehicles have been identified. Existing pavements widening especially between the sites and Billericay station over both railway bridges have not been shown as being widened. The footbridge over the railway near the</p>	

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										<p>high street is inadequate due to the population explosion, old and in poor condition, the footbridge where the foot crossing across the railway used to be leads to a path which is too small to accommodate the population explosion, the road bridge over the railway on Mountnessing road is very narrow and the footpath is very narrow only a couple of feet wide not wide enough for two persons to pass and will not accommodate the population increase safely over the bridge that would use it to commute to Billericay Station. This would be very dangerous as you would need to walk into the road. The Mountnessing Road bridge already has a blind summit and due to the close proximity of the roundabout would lead to extensive traffic queues. There is no safe crossing at the roundabouts for person walking to the station either. All of these issues need to be addressed for the sustainable movement of people in a safe suitable manner.</p> <p>Car Parking at the station and within all of the car parks in Billericay is already full and the explosion in traffic needing to use the car parks in Billericay will lead to gridlock. Basically there is nothing to justify how the additional housing estates will improve traffic pollution / traffic congestion / traffic movements / car parking and it never can. There are limited bus stops and very poor bus service along and adjacent to the proposed routes serving the high street and railway station. Most of the existing bus stops in Billericay do not have a pull in bus stop lay by and therefore when the bus stops this prevents traffic passing and increases the potential of an accident black spot and causes congestion, vehicle pollution and gridlock. There does not seem to be any provision for additional public transport to serve Billericay existing population or the new housing estates population increase to ensure that there is no additional increase in traffic movements / congestion.</p> <p>The new housing developments will give rise to cars and vehicles backing into the estates and affecting flow on the main roads they join causing major traffic disruption and increased traffic noise pollution and air pollution. There is no mention of hundreds / Thousands of new trees shown to be planted in Billericay to offset the loss of Greenbelt land which is essential to help treat and reduce the increase in pollution that will occur due to the explosion in traffic pollution or the heat island effect that will occur as a result of the construction of the new housing estates. The trees are necessary to offset the impact of the scientifically proven climate change occurring. The council do not maintain the existing soft landscaping around Billericay. They have let existing soft landscaping plants and bushes die and there has been no sign of replanting. It is assumed that the new developments would include many areas of soft landscaping however it is unlikely the council would maintain these areas after adoption and they would be left to perish and become untidy this limiting the improvement in reducing / controlling air pollution, responding to climate change and the heat island effect. There is no discussion about highways street lighting being designed to avoid light pollution with energy efficient lights allowing shutting down between the hours of 12 midnight and 5 AM. What contribution is the developer making to the improvement</p>	

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										<p>of roads in the vicinity as there are many pot holes in the area including the improvement to the pavements as they are in a poor state of repair in Billericay. The maintenance of the existing roads is not being carried out by the council and they are in a dangerous and unacceptable condition and already the maintenance of the existing roads is not sustainable and with the reduction in funds that the council use to maintain roads building new housing estates with additional roads will make the situation worse.</p> <p>The additional air pollution, noise pollution and congestion from construction traffic and staff arriving to and from the sites (with more damage to local roads) is not sustainable. This is likely to cause gridlock as the developers will pt in temporary traffic lights to suit themselves rather than maintaining the flow of traffic in an already congested and gridlocked Billericay.</p> <p>There are two main bridges over the railway line running through Billericay which as constructed are not fit for purpose even to support the current movements of traffic in and through Billericay. They are a bottleneck for congestion and gridlock. There is no evidence in the plan that controls the inevitable traffic explosion, increased air pollution and increased nose pollution that will come with the new housing estates without exacerbating the gridlock currently experienced entering and within Billericay. There is no mention of how the developments effect the Billericay electricity grid infrastructure. ? The electrical infrastructure likely to need reinforcing but from a sustainable point of view it would seem the only way is to install PV on all the roofs of the proposed new houses on the new developments or an adjacent solar farm to offset any additional use of the existing electrical grid and would be a positive move from a sustainable point of view. There are too many new houses and estates that are being built for developers profit that do not have any sustainable features in them. If governments are to hit the reduction in carbon emissions and get the air pollution levels reduced to a safe level and lower action must be taken now. What traffic calming measures are proposed (accident black spot to improve safety to allow cars to enter and exit developments onto the main roads? It is already challenging / unsafe to get out of some estates in Billericay due to the extent of traffic movements and congestion. What does highways design department propose for Billericay roads to allow free movement of traffic passing through Billericay and those who live in Billericay. The quantity of the house will lead to gridlock and unsafe air pollution and traffic noise occurring over a longer time period through the day and night. The existing traffic lights installed already lead to very long waiting times depending on how you enter Billericay because the roads are not wide enough to introduce long filter lanes and therefore there is long queues occurring at traffic lights. It is important to encourage the use of cycling in Billericay to reduce reliance on using cars and this will mean introducing cycle paths,</p>	

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										<p>places for cycles to be locked securely etc. This seems to be lacking in the proposals.</p> <p>The infrastructure on the railways, roads, dentists, schools, Doctors surgeries, health services is already at capacity and from a sustainability point of view cannot absorb the population explosion that would come with the construction of the new housing estates. Let's have the infrastructure in place first before any new housing estates are built.</p> <p>There is not sufficient evidence to indicate what the actual housing estates will contribute in terms of renewable sources of energy. Housing estates should not continue to be built putting pressure on grid and utility networks and look to be self supporting.</p> <p>Billericay already resides in one of the driest regions of the United Kingdom. There is no mention of how the new housing estates will avoid taking water from the mains supplies during construction and if constructed. It would be assumed that the properties would be built with rainwater storage and harvesting tanks to use for toilet flushing and general washing or local underground tanks are installed to the new housing estates.</p> <p>The existing underground drainage system is not suitable to cater for the additional estates to be built. There have been issues with flooding in Billericay and it would be assumed that the estates would be built to include storm water storage tanks to control water entering the existing sewers / rivers / watercourses to avoid flooding in a storm event.</p> <p>There is no evidence in the proposals that the housing would be zero Carbon. The climate change issues mean the housing should be design and constructed to meet zero carbon and the council should impose this on the developers as part of pre-planning approval. The council and planning authorities should recognise that if they are unable to maintain the existing infrastructure and provide services to the current population of Billericay already in a sustainable manner then there cannot be any supporting evidence that would allow the proposed new housing developments to be constructed.</p> <p>The Essex and the eastern region population is expanding and a significant number new homes are being proposed as identified in the local authority plans. It is not clear that Abellio greater Anglia are aware of this and are planning for additional passenger numbers significant growth at all times of the day not just commuting. The railway network is already at capacity / 100% saturated and therefore this will have a major impact on the population of Billericay using the station for leisure and commuting. There is no clear message how the train networks are expanding their network, constructing new railway lines or new stations / additional railway sidings to address the</p>	

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										expanding population of Essex and Billericay should the housing estates be built. How about opening up lines and stations that were closed after the Dr Beeching report in the 1960's? The explosion in population in Billericay and the Essex region does will therefore leave the railway as a form of non sustainable transport if immediate action is not taken to address the low capacity of the railways, without new railway lines (also distributed to other areas without railway lines), without new railway stations (also distributed to other areas without train stations), this will put more vehicles on the road leading to more air, noise pollution and gridlock. Where do we go from there when that happens? The developments are unlikely to support the rising local population need for affordable houses such as 1, 2 and 3 bedroom properties / family homes and not sustainable for the local population.	
<a href="#">RPLP/1523</a>	Mr Philip Drane	Brentwood Borough Council			Yes	No	Positively prepared	Yes	Brentwood Borough Council is committed to resolve this issue with Basildon Borough Council through a Statement of Common Ground. if this issue remains unresolved through this process it may be necessary for a representative of Brentwood Borough Council to participate in the oral part of the examination for this issue as a neighbouring authority.	N/A	Full Brentwood Borough Council response, approved at Planning & Licensing Committee 11/12/2018 (4)
<a href="#">RPLP/1268</a>	Mrs Janette Joshi				Yes	No	Justified	No	n/a	n/a	
<a href="#">RPLP/1253</a>	Mrs Janette Joshi				Yes	No	Justified	No	n/a	n/a	
<a href="#">RPLP/1298</a>	Mrs Sarah Pourrat				Yes	No	Justified; Consistent with national policy	No		<p>Building so many homes in Billericay is not sustainable in infrastructure terms due to -</p> <p>train capacity - it is very difficult to get on the over crowded trains in to Liverpool Street already.</p> <p>road capacity and poor road networks in and over of billericay</p> <p>2,800 new homes in Billericay, but no jobs - so every new home is to be filled with people who travel to work.</p> <p>GPs and hospitals already can not cope - I had to take my daughter in the last weeks for daily nurses appointments, every time we had to</p>	

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										<p>travel to orsett as there were no appointments in Billericay. Basildon hospital is almost impossible to park.</p> <p>Primary school places - Billericay schools are full.</p> <p>water drainage capacity, billericay roads already flood without the loss of green belt and additional water drainage capacity from the new homes.</p>	
<a href="#">RPLP/645</a>	Mr. Ricky Dowles				No	No	Positively prepared; Justified; Effective; Consistent with national policy	No		Already commented	Map showing site
<a href="#">RPLP/1859</a>		Gleeson Developments Ltd	Mrs Jacqueline Mulliner	Terence O'Rourke Ltd	Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	Gleeson Strategic Land have a significant interest in land within the Borough and allocated within the Plan, and consider it necessary to participate at the oral part of the examination to further elaborate on the points raised within the representations, and to discuss the evidence presented and the required changes to the Plan to make it sound.		<p>RPLP-1844 TOR-Gleeson cover letter_Redacted.pdf</p> <p>RPLP-1844 TOR-Gleeson H17_181217 Representation.pdf</p> <p>RPLP-1844 TOR-Gleeson Consultation_Response_Booklet_Redacted.pdf</p>
<a href="#">RPLP/2565</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective; Consistent with national policy			<p>Population density data and IMD data should be incorporated into the Sustainability Appraisal.</p> <p>Baseline air quality data is required for all areas of the borough and for the range of pollutants in the air. This baseline air quality data should be incorporated into the S.A and S.E.A - The minimal result from nitrous dioxide testing alone and in one summer month only once is not sufficient. This information should then inform the need to make changes to the distribution and amount of development and or mitigation required.</p>	RPLP-2538 R Lazarus 2_Redacted 3.pdf
<a href="#">RPLP/3069</a>	Mr Shaun Howchen				No	No	Positively prepared; Justified			This plan is not sustainable and the unnecessary loss of green belt land will have a large impact on local wildlife.	RPLP-3069 Shaun H_REDACTED 5.pdf
<a href="#">RPLP/1284</a>	Mr Jeffrey Fairfull				Yes	No	Justified; Effective	No		These plans will result in a substantial reduction in wildlife habitat and wildlife corridors. It will result in urban sprawl and a severe reduction in Green Belt open land which currently provides significant and	



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										essential benefits to residents both new and old. It will result in a severe reduction in the quality of life for all concerned.	
<a href="#">RPLP/1209</a>	Mrs Nicola Morris				No	No	Justified; Consistent with national policy	No		The high number of new houses under the current plan will have a highly negative impact on quality of life in Billericay. The building phase will be highly disruptive and when built the additional demand for services and extra traffic will be detrimental.	
<a href="#">RPLP/1483</a>	Mr Sebastien Pourrat				No	No	Justified	No		It is my belief that the current plan will incur a significant loss of Green Belt within the Billericay area. It is in the interest of current and future generation to protect the Green belt and thus should be one of the foremost consideration in the Council's plan. It is also my understanding the councils are not obliged to build on their Green Belt by any of the governmental direction.	
<a href="#">RPLP/4199</a>	Mrs Brenda Allaker					No	Justified	No		We should be meeting the needs of the present without compromising the ability of future ,. generations, effectively our schools are filled to the maximum. We do not need to jeopardise, their future. I would suggest possibly building another school on one of these sites instead of houses. We need to prevent Billericay becoming overpopulated. Please note: Not all residents of Billericay are able to voice their opinions on-line or in writing mainly because they do not have access to internet or are not In the position to complete the forms. This isn't a fair representation of our thoughts as a total community. There should be a way of perhaps arranging meetings for those less able in these circumstances.	RPLP- 4193 B Allaker_redacted.pdf
<a href="#">RPLP/4713</a>	Mr Malcolm Neil				No	No	Justified; Effective; Consistent with national policy	No		The effects on pollution if this plan goes ahead are massive air quality will suffer hugely residents with breathing issues will suffer. all our existing wildlife will suffer. Ancient woodland could be lost forever.	RPLP-4713 M Neil_Redacted.pdf
<a href="#">RPLP/2246</a>		Bellway Homes and Crest Nicholson	David Carlisle	AECOM	No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	Yes, our clients wish to participate at the examination hearing sessions.  The detailed points raised in our main representations raise several fundamental soundness issues that can only be addressed via main modifications should the plan be submitted without modification.	Our concerns with the Sustainability Appraisal (SA) report (October, 2018) are twofold -  1) The report does not present sufficient information on reasonable alternatives. Whilst the report does present some limited information on alternatives in relation to a number of policies in isolation, it does not present information on alternatives in respect of the issue at the very heart of the plan, namely the allocation of land for housing and the spatial strategy and distribution of those sites (and their relative performance against the SA objectives).  2) The report does not present an outline of the reasons for selecting the alternatives dealt with (as required by law and set out in the planning practice guidance). In each instance the report fails to present outline reasons to justify the range of site alternatives examined. For example, on <b>pages 57-71</b> we see a range of alternatives in relation to the matter of high-level consideration of sites. Various site alternatives are presented in <b>Figure 4.2 pg62</b> , with no explanation of why these represent the reasonable alternatives, in	RPLP-2245 Bellway Homes and Crest Nicholson Local Plan representations 17 12 2018.pdf

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
										<p>relation to this particular issue. The fundamental flaw with the SA process is that reasonable alternatives, in terms of alternative 'basket of sites' have not been examined in relation to the key objective at the heart of the plan, namely allocation of a package of sites to meet objectively assessed housing needs.</p> <p>1.14 The report does present information in relation to the matter of differing housing quanta, and in relation to the matter of broad distribution. The SA must test alternative growth quanta and include a series of reasonable alternatives for differing packages of sites (avoiding 'straw men' and without undue reliance on former extant policies and previous Local Plan consultations).</p> <p>1.15 The SA cannot be said to be analysis of 'reasonable alternatives' in the context of a Local Plan. It is not the role of Local Plans to simply determine a housing growth quanta figure, nor is it the role of Local Plans to simply define a broad distribution for housing growth. The approach taken by Basildon is clearly contrary to the legal requirement, which is to examine reasonable alternatives [Reg 12(2)] "taking into account the objectives and geographical scope of the plan".</p> <p>1.16 Clearly the geographical scope of the plan is the Local Authority area, and the key objective is to allocate a package of sites to meet objectively assessed needs, and support the achievement of wider objectives. There can be no confidence that the Council sufficiently grappled with the matter of spatial strategy ahead of preparing the Regulation 19 Local Plan, and we can conclude that stakeholders were not presented with information on genuine reasonable alternatives as part of this Regulation 19 consultation.</p> <p>1.17 The Council instead relies on an SA that deals with the policies in isolation and one high level appraisal of Policy SD1 which is almost meaningless, let alone relevant for assessing its suitability against the SA objectives without a clear comparison against other reasonable alternatives.</p>	
<a href="#">RPLP/2714</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective; Consistent with national policy			<p>The Sustainability Appraisal including Strategic Environmental Assessment says on page 579 under 5 "ensure the Borough's Town Centres are promoted"</p> <p>"The policy would provide a moderate amount of residential development. The allocation is to include essential community facilities will compete significantly with town centre uses in Basildon. Therefore a minor positive."</p> <p>H16 is now a site off Potash Road, Billericay. What essential community facilities and services would this allocation include? H16 is 11 hectares. H16 is an entirely new site for around 255 new homes H19 of the Draft Local Plan we saw in June 2016 is not available for</p>	RPLP- 2699 R Lazarus 6_Redacted 3.pdf

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										<p>development - it is held in ownership to prevent its development. It is next to the new H16.</p> <p>New site H16 does not have a Habitat Regulation Assessment or Sustainability Assessment. A site specific Strategic Environmental Assessment is needed.</p> <p>The nitrous dioxide levels measured at the Potash Road roundabout were in the same range as those near the A127 which have meant sites are not bought forward for development until pollution levels have been acceptably reduced.</p> <p>H19 of the Draft Local Plan included pre-school and primary school facilities. H16 of the RP Local plan does not.</p>	
<a href="#">RPLP/2486</a>	Mr John Waymark				Yes	No		Yes	I am a long standing resident of Billericay + all my family have grown up + still includes my Grandchildren. In order for me to have a say in the way that their children are brought up and educated in the same environment it is important that residents like myself have a say in their future.	Has the impact on habitat been considered such as a badger out burrey + other protected areas	RPLP-2486 J Waymark_redacted.pdf
<a href="#">RPLP/3274</a>	Mrs Pat Brown				Yes	No	Justified; Effective; Consistent with national policy	No		<p>Greenbelt should be used for what it is intended! People to enjoy, to preserve plants, trees, animals insects &amp; birds.</p> <p>Once the greenbelt is removed you cannot "get it back". The contents cannot be removed &amp; put elsewhere they will simply be lost forever. Councils do not have to build on green belt, Billericay does not want to loose its green belt.</p>	RPLP-3274 Brown_Redacted.pdf
<a href="#">RPLP/3282</a>	Mrs Pat Brown				Yes	No	Justified; Effective; Consistent with national policy	No		<p>Greenbelt should be used for what it is intended! People to enjoy, to preserve plants, trees, animals insects &amp; birds.</p> <p>Once the greenbelt is removed you cannot "get it back". The contents cannot be removed &amp; put elsewhere they will simply be lost forever. Councils do not have to build on green belt, Billericay does not want to loose its green belt.</p>	RPLP-3274 Brown_Redacted.pdf
<a href="#">RPLP/3286</a>	Mrs Pat Brown				Yes	No	Justified; Effective; Consistent with national policy	No		<p>Greenbelt should be used for what it is intended! People to enjoy, to preserve plants, trees, animals insects &amp; birds.</p> <p>Once the greenbelt is removed you cannot "get it back". The contents cannot be removed &amp; put elsewhere they will simply be lost forever.</p>	RPLP-3274 Brown_Redacted.pdf

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										Councils do not have to build on green belt, Billericay does not want to lose its green belt.	
<a href="#">RPLP/3164</a>	Pauline Bowles	Little Burstead Parish Council			Yes	No	Justified; Effective; Consistent with national policy	No		Not applicable - none given.	RPLP - 3161 Bowles - Little Burstead_redacted.pdf
<a href="#">RPLP/4768</a>	Miss Wendy Bidwell				Yes	No	Justified	Yes	I was born in Billericay and have lived here all my life	Hedgerows, trees and landscape will all be ruined by this plan landscape buffers are not enough you are being greedy with land that is green belt and should not be built on. This is an established landscape and woodlands and cannot simply be replaced with a few saplings and grass seed areas as green corridors.	RPLP- 4768 W Bidwell_redacted.pdf
<a href="#">RPLP/281</a>	Mr William Porter				No	No	Positively prepared; Justified; Effective; Consistent with national policy	No		Billericay town centre is already choked of traffic, with limited parking area's and a clogged railway access.  The extra housing proposed would not alleviate any of these current problems.	
<a href="#">RPLP/2247</a>		Bellway Homes and Crest Nicholson	David Carlisle	AECOM	No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	Yes, our clients wish to participate at the examination hearing sessions.  The detailed points raised in our main representations raise several fundamental soundness issues that can only be addressed via main modifications should the plan be submitted without modification.	Our concerns with the Sustainability Appraisal (SA) report (October, 2018) are twofold -  1) The report does not present sufficient information on reasonable alternatives. Whilst the report does present some limited information on alternatives in relation to a number of policies in isolation, it does not present information on alternatives in respect of the issue at the very heart of the plan, namely the allocation of land for housing and the spatial strategy and distribution of those sites (and their relative performance against the SA objectives).  2) The report does not present an outline of the reasons for selecting the alternatives dealt with (as required by law and set out in the planning practice guidance). In each instance the report fails to present outline reasons to justify the range of site alternatives examined. For example, on <b>pages 57-71</b> we see a range of alternatives in relation to the matter of high-level consideration of sites. Various site alternatives are presented in <b>Figure 4.2 pg62</b> , with no explanation of why these represent the reasonable alternatives, in relation to this particular issue. The fundamental flaw with the SA process is that reasonable alternatives, in terms of alternative 'basket of sites' have not been examined in relation to the key objective at the heart of the plan, namely allocation of a package of sites to meet objectively assessed housing needs.  1.14 The report does present information in relation to the matter of differing housing quanta, and in relation to the matter of broad distribution. The SA must test alternative growth quanta and include a series of reasonable alternatives for differing packages of sites	RPLP-2245 Bellway Homes and Crest Nicholson Local Plan representations 17 12 2018.pdf

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
										<p>(avoiding 'straw men' and without undue reliance on former extant policies and previous Local Plan consultations).</p> <p>1.15 The SA cannot be said to be analysis of 'reasonable alternatives' in the context of a Local Plan. It is not the role of Local Plans to simply determine a housing growth quanta figure, nor is it the role of Local Plans to simply define a broad distribution for housing growth. The approach taken by Basildon is clearly contrary to the legal requirement, which is to examine reasonable alternatives [Reg 12(2)] "taking into account the objectives and geographical scope of the plan".</p> <p>1.16 Clearly the geographical scope of the plan is the Local Authority area, and the key objective is to allocate a package of sites to meet objectively assessed needs, and support the achievement of wider objectives. There can be no confidence that the Council sufficiently grappled with the matter of spatial strategy ahead of preparing the Regulation 19 Local Plan, and we can conclude that stakeholders were not presented with information on genuine reasonable alternatives as part of this Regulation 19 consultation.</p> <p>1.17 The Council instead relies on an SA that deals with the policies in isolation and one high level appraisal of Policy SD1 which is almost meaningless, let alone relevant for assessing its suitability against the SA objectives without a clear comparison against other reasonable alternatives.</p>	
<a href="#">RPLP/1513</a>		New Hall Properties (Eastern) Ltd	Mr Simon Flisher	Barton Willmore	Yes	Yes		No	N/A	N/A	
<a href="#">RPLP/1619</a>	David Walsh	Hovefields and Honiley Neighbourhood Forum	Ms Liz Loughran	Line Planning Ltd	No	No	Justified; Effective; Consistent with national policy	Yes	As above	The SA lacks information on social objectives relating to social cohesion.	RPLP-1619 HHNf_Email_Redacted.pdf RPLP-1619 HHNf_Redacted.pdf
<a href="#">RPLP/1595</a>	Mr George Jeffery				No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	<p>I consider this to be necessary, as I believe I have some points to discuss regarding how the plan has either been positively prepared, effective or consistent with national policy within the environment as a sitting councillor for Wickford Park.</p> <p>Help provide a view of policies within the local</p>	<p>Hovefields is not within walking distance from a school, health facilities or transport infrastructure placing a massive reliance on vehicular use.</p> <p>Inadequate planning for flooding risks on H12.</p> <p>Hovefields, Wickford was a site for two great crested newt ponds, both of which has been filled by spoil as a result of the development of hard standings. There has been limited to no enforcement despite their protected status.</p> <p>Basildon Borough Council's failure to properly engage with the neighbourhood area which was created by the residents with the help of local councillors to address the local challenges in a sustainable,</p>	



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									<p>plan that could or could not be considered internally consistent. Either through looking at the Economic strategy for through the local plan, a perspective can be provided on the effects of the Gypsy and Traveller policy and whether it should have been considered separate to have a fully sound and effective policy to suit needs of the settled and traveller communities.</p>	<p>balanced and strategic way in order to redress many of the imbalances as listed below:</p> <ul style="list-style-type: none"> <li>• Non enforcement on infill of the Great Crested Newt Ponds, removal of Grassland and installation of hard standing from building waste with an origin that's unknown.</li> <li>• Reduction in prosperity and economy growth as a result of their distance from educational and health services.</li> <li>• Neglect of settled community of 9 households and with a potential of 26 traveller pitches after the additional 13 which may be granted by this local plan.</li> <li>• Approximately 1/3 of Wickford Park Ward Crime is concentrated in this area, residents deserve to be save in their own community and homes.</li> <li>• Basildon Borough Council criteria policy will land lock Hovefields from removing their potential to regenerate, create sustainable development, and flexibility for future growth.</li> </ul>	
<a href="#">RPLP/2699</a>	Mr Roland Lazarus					No	Justified; Effective			<p>The Sustainability Appraisal including Strategic Environmental Assessment says on page 579 under 5 "ensure the Borough's Town Centres are promoted"</p> <p>"The policy would provide a moderate amount of residential development. The allocation is to include essential community facilities will compete significantly with town centre uses in Basildon. Therefore a minor positive."</p> <p>H16 is now a site off Potash Road, Billericay. What essential community facilities and services would this allocation include? H16 is 11 hectares. H16 is an entirely new site for around 255 new homes H19 of the Draft Local Plan we saw in June 2016 is not available for development - it is held in ownership to prevent its development. It is next to the new H16.</p> <p>New site H16 does not have a Habitat Regulation Assessment or Sustainability Assessment. A site specific Strategic Environmental Assessment is needed.</p> <p>The nitrous dioxide levels measured at the Potash Road roundabout were in the same range as those near the A127 which have meant sites are not bought forward for development until pollution levels have been acceptably reduced.</p> <p>H19 of the Draft Local Plan included pre-school and primary school facilities. H16 of the RP Local plan does not.</p>	RPLP - 2699 R Lazarus 6_redacted 1.pdf



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<a href="#">RPLP/2706</a>	Mr Roland Lazarus					No	Positively prepared; Justified; Effective; Consistent with national policy			<p>The Sustainability Appraisal including Strategic Environmental Assessment says on page 579 under 5 "ensure the Borough's Town Centres are promoted"</p> <p>"The policy would provide a moderate amount of residential development. The allocation is to include essential community facilities will compete significantly with town centre uses in Basildon. Therefore a minor positive."</p> <p>H16 is now a site off Potash Road, Billericay. What essential community facilities and services would this allocation include? H16 is 11 hectares. H16 is an entirely new site for around 255 new homes H19 of the Draft Local Plan we saw in June 2016 is not available for development - it is held in ownership to prevent its development. It is next to the new H16.</p> <p>New site H16 does not have a Habitat Regulation Assessment or Sustainability Assessment. A site specific Strategic Environmental Assessment is needed.</p> <p>The nitrous dioxide levels measured at the Potash Road roundabout were in the same range as those near the A127 which have meant sites are not bought forward for development until pollution levels have been acceptably reduced.</p> <p>H19 of the Draft Local Plan included pre-school and primary school facilities. H16 of the RP Local plan does not.</p>	RPLP - 2699 R Lazarus 6_redacted 2.pdf
<a href="#">RPLP/2516</a>	Mr Roland Lazarus					No	Positively prepared; Effective; Consistent with national policy			<p>The sustainability Appraisals and Strategic Environmental Assessments have not guided or effectively influenced the development of the R.P. Local plan.</p> <p>Of the 19 new residential sites in the RP Local Plan- H4 to H22 one has one positive no double positive 5 negative and 2 double negative, that is H21. one has 4 positives and 8 negatives - H22. one has 5 positives or double positives and 8 negatives - H9. one has 5 positives and 6 negatives- H4. H10 has 4 positives and 8 negatives. H16 has 6 positives , 7 negatives and a double negative. H15 has 6 positives, 5 negatives and 2 double negatives. These are all more negative than positive.</p> <p>H20 has 7 positives and a double positive with 5 negatives. H19 has 4 positives, 5 double positives 5 negatives and 2 double negatives.</p> <p>All the rest, H5, H6, H7, H8, H11, H12, H13, H14,H17 and H19 have at least 2 double positives and 10 positives</p>	RPLP-2510 R Lazarus 1_Redacted2.pdf
<a href="#">RPLP/2137</a>	Mr Roland Brass					No		Yes		The site opportunity is supported by the Local Plan evidence base and represents sustainable development and therefore we recommend that is allocated for housing in the Local Plan. The site allocation	RPLP-2102 GL Hearn Basildon_LP Reg

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										would also contribute towards the Local Plan vision and strategic objectives. The Sustainability Appraisal (2018) recognises significant positive effects against the level of development proposed at Bowers Gifford. It states that "Significant positive effects are identified against SA objectives 6 (education and social inclusion), 7 (meeting housing need), 8 (health and wellbeing) and 10 (regeneration) in acknowledgement of the scale of dwellings allocated for delivery within the North Benfleet and Bowers Gifford Neighbourhood Plan Area (1,350 dwellings). The delivery of such a significant number of homes will meet a significant proportion of the Borough's housing needs including new local services and facilities such as schools, open spaces and health care facilities, helping to regenerate areas of the Borough known to be deprived and in need of investment and regeneration". We support the comments set out in the Sustainability Appraisal in respect of the positive effects of development at Bowers Gifford. In relation to other points set out in our Representations, we therefore recommend that it is vital that to ensure these positive effects are delivered and therefore the Local Plan must allocate land in this area for new housing development. This land should include the site, as set out in the High Level Development Framework (2017) which is supported by a suite of evidence. This matter is further discussed below. The changes in Policy in terms of the site allocation / shift to neighbourhood planning are not justified within the Sustainability Appraisal.	19_Reps_FINAL_inc form_Redacted.pdf
<a href="#">RPLP/1898</a>	Croudace Homes	Croudace Strategic	Mr David Maxwell	GL Hearn Limited	Yes	Yes				<p>The new Basildon Local Plan, culminating in the reg. 19 consultation Local Plan, has been prepared throughout a number of years and including extensive option testing, consultation and assessment.</p> <p>The integrated Sustainability Assessment and Strategic Environmental Assessment provides a robust and systematic evaluation of the social, environmental and economic impacts arising from the proposed strategic policies, site allocations and development management policies. The Sustainability Appraisal also considers the proposed Local Plan policies against reasonable alternatives.</p> <p>Croudace Homes supports the conclusion of the Sustainability Appraisal which state that the scale of development needed inevitably means that a significant amount of greenfield land, including Green Belt land, will need to developed leading to potential significant effects on landscapes, biodiversity and cultural heritage. However, the Sustainability Appraisal confirms that alternatives to allocations within the Local Plan generally did not perform better and in many instances did not perform as well.</p> <p>Croudace Homes also supports the Sustainability Assessment scores for site allocation H10 (land east of Noak Bridge), notably the high scores for the site regenerating and renewing disadvantaged areas where people live or work in the Borough. The Sustainability Appraisal also confirms the proposed new homes being in a location that benefits from existing and planned health and wellbeing land</p>	<p>RPLP-1884 Croudace GL Hearn booklet 1 Redacted.pdf RPLP-1884 Croudace GL Hearn H10 Landscape and Visual Assessment figures 1-4.pdf RPLP-1884 Croudace GL Hearn booklet 2 Redacted.pdf RPLP-1884 Croudace GL Hearn H10 Flood Risk Assessment and SUDS Report.pdf RPLP-1884 Croudace GL Hearn H10 Ecology Report.pdf RPLP-1884 Croudace GL Hearn H10 Landscape and Visual Assessment.pdf RPLP-1884 Croudace GL Hearn</p>

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										uses, and proximity of the proposed new homes to a range of health and recreation facilities.	H10 Landscape and Visual Assessment figures 5-7d.pdf RPLP-1884 Croudace GL Hearn H10 Transport Report.pdf RPLP-1884 Croudace GL Hearn H10 Landscape and Visual Assessment figures 7e-8.pdf
<a href="#">RPLP/3243</a>	Ms Candy Sheridan	The Gypsy Council	Stuart Carruthers							The Basildon Council's Sustainability and Habitat Regulations Assessments are regarded as flawed due to the Basildon Council's failure to seek to meet Objectively Assessed Needs in its Revised Publication Local Plan, and failure to address environmental damage in the Dale Farm and Hovefield areas.	RPLP- 3176 Carruthers - Dale Farm - Gypsy Council_Redacted.pdf
<a href="#">RPLP/3689</a>	Mrs Christine Barlow	Bowers Gifford and North Benfleet Parish Council						Yes		The Sustainability Appraisal (SA) is considered broadly acceptable in terms of meeting the obligations of national policy. However, there is a significant lack of detail in respect of some of the most important changes made to the final version of the Local Plan in terms of the new proposals and how they compare with the discarded reasonable alternatives. This is apparent in relation to Policy E6, which the SA acknowledges has increased the employment land provision from 5 Ha to 48 Ha, and to Policy H 11, the essence of which is very different and new elements of which (including the secondary school and bus road) have not been properly explained or assessed. The SA assessment of policies SD2 and SD3, which together provide the strategic policy justification (under NPPF paragraph 136) for the Bowers Gifford & North Benfleet Neighbourhood Plan, is also unnecessarily weak. Policy SD3 cannot possibly lead to entirely positive effects simply as a result of directing neighbourhood plans to make provision for development rather than the Local Plan serving that same purpose. However, enough evidence is available from the early drafting of the Neighbourhood Plan to inform a meaningful assessment of both positive and adverse effects. The Parish Council expects to be able to update and broaden that evidence base with a separate SA of the draft Neighbourhood Plan by the time of the Local Plan examination, to enable these weaknesses to be addressed through amendments to the Local Plan SA.	RPLP-3676 BGNB Parish Council_redacted.pdf
<a href="#">RPLP/2014</a>	Phil Bamford	Gladman Developments Ltd						Yes	Gladman request to participate at the hearing sessions at the Examination in Public of the BRLP document and to be added to the consultation database to	In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in local plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the	RPLP-2011 Gladman Phil Bamford.pdf

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
									be kept informed of progress of the Basildon Local Plan.	effects of the Local Plan's proposals on sustainable development when judge against reasonable alternatives.  The Local Plan should ensure that the results of the SA process clearly justify its policy choices, including the proposed site allocations and the approach taken to new growth when judged against 'all reasonable alternatives'. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. The Council's decision making and scoring should be robust, justified and transparent and should be undertaken through a comparative and equal assessment of each reasonable alternative. Too often the SA process flags up the negative aspects of development whilst not fully considering the positive aspects which can be brought about through new opportunities for housing development and how these can influence landscape issues, social concerns and the economy.	
<a href="#">RPLP/2194</a>		BDW Eastern Counties	Mrs Lauren Patel	Barton Willmore LLP						Sustainability Appraisal including Strategic Environmental Assessment  4.3 The RPDLP is supported by a Sustainability Appraisal incorporating Strategic Environmental Assessment. We do not wish to comment on the detailed analysis contained within these reports. However, we note that the difference in numbering of strategic sites between the Draft Local Plan and the RPDLP is confusing, as in some parts of the reports the sites are being assessed against the old numbering and in other parts the new. Further, at paragraph 1.114 of the non-technical summary we would question whether the reference to Policy H20 here is correct.	RPLP-2187 Lauren Patel for BDW Eastern Counties Reprs.pdf RPLP-2187 Lauren Patel for BDW Eastern Counties Booklet Redacted.pdf
<a href="#">RPLP/3244</a>	Dale Farm Residents Group		Stuart Carruthers							The Basildon Council's Sustainability and Habitat Regulations Assessments are regarded as flawed due to the Basildon Council's failure to seek to meet Objectively Assessed Needs in its Revised Publication Local Plan, and failure to address environmental damage in the Dale Farm and Hovefield areas.	RPLP- 3176 Carruthers - Dale Farm - Gypsy Council_Redacted.pdf
<a href="#">RPLP/2054</a>	Miss Anna Davies	Taylor Wimpey	Mr Taylor Cherrett	Turley	No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes		Sustainability Appraisal (SA)  5.1 The SEA/SA Regulations Schedule 2(8) requires an "assessment of reasonable alternatives" and the identification of the "reasons for selecting the alternatives tested in the light of the others available." In Ashdown Forest Economic Development LLP v SSCLG and Wealden DC [2014] EWHC 406 (Admin), Mr Justice Sales held (at paragraph 97) that the plan-maker should be aware "The court will be alert to scrutinise its choices regarding reasonable alternatives to ensure that it is not seeking to avoid that obligation by saying that there are no reasonable alternatives or by improperly limiting the range of such alternatives which is identified."	RPLP-1908 Turley-Taylor Wimpey Land at Kingsmans Farm Policy H17c Part3_Redacted.pdf RPLP-1908 Turley-Taylor Wimpey Land at Kingsmans Farm - Policy H17c Part1_Redacted.pdf RPLP-1908 Turley-Taylor Wimpey Land at Kingsmans Farm - Policy H17c Part2.pdf RPLP-1908 Turley-Taylor

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										<p>5.2 It is clear that in a number of cases BBC have not adequately considered reasonable alternatives to meet this clear legal requirement.</p> <p>5.3 In relation to Chapter 6 of the Publication Local Plan (Achieving Sustainable Development), which considers the policies which seek to outline and manage the level of growth anticipated, namely Policy SD1: A Strategic Approach to Sustainable Development in Basildon Borough, the SA notes in relation to reasonable alternatives:</p> <p><i>“Despite the significant adverse effects of accommodating the scale and distribution of growth planned for in the Borough in the Publication Local Plan, it is recognised that the rate of housing delivery expected in the Plan period falls short of that considered necessary to support housing need and economic growth. Consequently, a significant adverse effect has been identified against SA objective 5 (housing) in combination with the significant positive effect identified in acknowledgement of the significant growth that has been planned for. It should be noted that if additional growth were to be accommodated within the Borough it is likely that the significant adverse effects that have been identified against the environmental SA objectives 1 (landscape, countryside and green spaces), 2 (historic environment), 3 (biodiversity) and 13 (flood risk) would be more reinforced.”</i></p> <p>5.4 This is not considered an adequate approach to the consideration of reasonable alternatives. A full assessment of the implications of the Council meeting its housing need in full should be undertaken, as well as an assessment of delivering development beyond the housing need in light of the requirement of the JSP.</p> <p>5.5 An SA style assessment, as provided for the proposed policies (Table 6.2 for instance), should be undertaken for all reasonable alternatives in relation to housing need.</p> <p>5.6 We note that the Council have provided a SA assessment of the “South West Billericay High Level Development Framework” starting at page 284 of the appendices to the assessment.</p> <p>5.7 This, we understand, has considered the following reasonable alternatives:•</p> <ul style="list-style-type: none"> <li>• The High Level Development Framework by Pell Frischman;</li> <li>• Extension of the residential development in the Preferred High Level Development Framework to the west of Tye Common further south to the northern edge of Tye Common Road •</li> <li>• Extension of the residential development in the Preferred High Level Development Framework to the west of Tye Common further south to the northern edge of Tye Common Road and re-routes the new relief road along the western edge of this</li> </ul>	Wimpey Response Booklet.pdf

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
										<p>extension, across Tye Common Road, before turning east and running along the southern edge of the development. This preferred route of the relief road cuts off the north western corner of Frith Wood, resulting in the loss of a small area of ancient woodland.</p> <p>5.8 It is clear that from an SA perspective the proposed options score exactly the same on every single criteria as one another (save for 13, albeit it is not clear why this is not the same for all options as it relates to flood risk).</p> <p>5.9 It is therefore not clear why the Council have sought to choose an option which delivers less housing and which would have the same sustainability impact as the other options which deliver a greater level of housing, especially in the context of the unmet need.</p> <p>5.10 It is therefore considered that the SA supports the allocation of additional land at South West Billericay. In line with paragraph 47 of the Framework.</p> <p>5.11 Also, and as noted, in these representations, TW have provided robust evidence to that demonstrate Firth Wood is not ancient, as enclosed at <b>Appendix 3</b>. TW therefore ask for the SA to be updated in this respect. TW would also ask that the Council consider through the SA the alternative relief options presented by TW in Chapter 3.</p>	
<a href="#">RPLP/1194</a>	Mr Gavin Taylor				No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	I would give more detail on the local surroundings and how impacted all residents will be.	I have already answered on my return for SD1	
<a href="#">RPLP/2551</a>	Mr Jamie Robert Melvin	Natural England								<p>Habitats Regulations Assessment</p> <p>Recreational Disturbance</p> <p>Our comments above relating to policy wording notwithstanding, Natural England commends the progress your authority and others have made with regards to mitigating impacts on the Essex Natura 2000 sites and we are confident that the Essex RAMS will safeguard the relevant designated features. We consider that the project is sufficiently progressed for us to agree with the HRA conclusion that <b>Basildon Borough Publication Local Plan will not result in adverse effects on the integrity of European sites, either alone or in-combination with other plans and projects</b> as a result of recreational impacts provided we can agree appropriate policy wording to ensure the strategy is delivered.</p>	RPLP-2544 Natural England_redacted.pdf



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										<p>Water Quality</p> <p>The HRA states that mitigation to address the uncertain effects of development on International sites is provided through Policy SD1, the strategic housing Policy H1 and Policy IMP1 which require that development is phased to align with provision of the infrastructure needed to support it. Natural England advises that, as currently worded, these policies do not offer sufficient mitigation to satisfactorily address this issue.</p> <p>We suggest that there needs to be a commitment in policy to co-operate with other utilities and service providers to ensure that appropriate capacity is available to serve new development and a clear statement that new development will only be permitted if the required capacity is available at the relevant water treatment works, including any associated sewer connections.</p> <p>Sustainability Appraisal</p> <p>We are satisfied that the SA objectives, assessment methodology and framework generally accord with the requirements of the Planning and Compulsory Purchase Act 2004 and the Strategic Environmental Assessment Regulations.</p>	
<a href="#">RPLP/974</a>	Mr BRIAN DICKS				Yes	No	Effective	No		Reduce town center traffic not increase it. Traffic and lack of parking contribute more to killing a High Street more than the internet. There is nothing in this plan that will reduce North/South traffic, This should be addressed.	
<a href="#">RPLP/1531</a>	Miss Sarah Hawkes				Yes	No	Justified; Consistent with national policy	No		I feel that allocating housing across the borough based on the population rather than how sustainable this will be is incorrect. The proposed plan allocates a large number of houses to be built on green belt, which is a protected area designed to allow a healthy environment for not only the residents, but also the many species of wild animals which survive in this ecologically sensitive area. I do not see any exceptional circumstances as to why this land should be built on, and believe other options should be considered.	
<a href="#">RPLP/457</a>	Miss Susan Maclean				Yes	No	Effective	No			
<a href="#">RPLP/959</a>	miss Tina Diprose				No	No	Positively prepared; Justified; Effective; Consistent with national policy	No		A sustainability assessment has not been conducted to support the distribution of housing. Housing has been simply allocated proportional to population rather than the ability for a town's infrastructure to support development. This is not inline with the pursuit of sustainable development that seeks to improve the conditions that people, live, work and take leisure.	
<a href="#">RPLP/1870</a>		Gleeson Developments Ltd	Mrs Jacqueline Mulliner	Terence O'Rourke Ltd	Yes	No	Positively prepared; Justified;	Yes	Gleeson Strategic Land have a significant interest in land within the		RPLP-1844 TOR-Gleeson cover letter_Redacted.pdf

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
							Effective; Consistent with national policy		Borough and allocated within the Plan, and consider it necessary to participate at the oral part of the examination to further elaborate on the points raised within the representations, and to discuss the evidence presented and the required changes to the Plan to make it sound.		RPLP-1844 TOR-Gleeson H17_181217 Representation.pdf RPLP-1844 TOR-Gleeson Consultation_Response_Booklet_Redacted.pdf
<a href="#">RPLP/2248</a>		Bellway Homes and Crest Nicholson	David Carlisle	AECOM	No	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	<p>Yes, our clients wish to participate at the examination hearing sessions.</p> <p>The detailed points raised in our main representations raise several fundamental soundness issues that can only be addressed via main modifications should the plan be submitted without modification.</p>	<p>Our concerns with the Sustainability Appraisal (SA) report (October, 2018) are twofold -</p> <p>1) The report does not present sufficient information on reasonable alternatives. Whilst the report does present some limited information on alternatives in relation to a number of policies in isolation, it does not present information on alternatives in respect of the issue at the very heart of the plan, namely the allocation of land for housing and the spatial strategy and distribution of those sites (and their relative performance against the SA objectives).</p> <p>2) The report does not present an outline of the reasons for selecting the alternatives dealt with (as required by law and set out in the planning practice guidance). In each instance the report fails to present outline reasons to justify the range of site alternatives examined. For example, on <b>pages 57-71</b> we see a range of alternatives in relation to the matter of high-level consideration of sites. Various site alternatives are presented in <b>Figure 4.2 pg62</b>, with no explanation of why these represent the reasonable alternatives, in relation to this particular issue. The fundamental flaw with the SA process is that reasonable alternatives, in terms of alternative 'basket of sites' have not been examined in relation to the key objective at the heart of the plan, namely allocation of a package of sites to meet objectively assessed housing needs.</p> <p>1.14 The report does present information in relation to the matter of differing housing quanta, and in relation to the matter of broad distribution. The SA must test alternative growth quanta and include a series of reasonable alternatives for differing packages of sites (avoiding 'straw men' and without undue reliance on former extant policies and previous Local Plan consultations).</p> <p>1.15 The SA cannot be said to be analysis of 'reasonable alternatives' in the context of a Local Plan. It is not the role of Local Plans to simply determine a housing growth quanta figure, nor is it the role of Local Plans to simply define a broad distribution for housing growth. The approach taken by Basildon is clearly contrary to the legal requirement, which is to examine reasonable alternatives [Reg 12(2)]</p>	RPLP-2245 Bellway Homes and Crest Nicholson Local Plan representations 17 12 2018.pdf

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on Sustainability Appraisal	Title
										<p>"taking into account the objectives and geographical scope of the plan".</p> <p>1.16 Clearly the geographical scope of the plan is the Local Authority area, and the key objective is to allocate a package of sites to meet objectively assessed needs, and support the achievement of wider objectives. There can be no confidence that the Council sufficiently grappled with the matter of spatial strategy ahead of preparing the Regulation 19 Local Plan, and we can conclude that stakeholders were not presented with information on genuine reasonable alternatives as part of this Regulation 19 consultation.</p> <p>1.17 The Council instead relies on an SA that deals with the policies in isolation and one high level appraisal of Policy SD1 which is almost meaningless, let alone relevant for assessing its suitability against the SA objectives without a clear comparison against other reasonable alternatives.</p>	
<a href="#">RPLP/1872</a>		Gleeson Developments Ltd	Mrs Jacqueline Mulliner	Terence O'Rourke Ltd	Yes	No	Positively prepared; Justified; Effective; Consistent with national policy	Yes	Gleeson Strategic Land have a significant interest in land within the Borough and allocated within the Plan, and consider it necessary to participate at the oral part of the examination to further elaborate on the points raised within the representations, and to discuss the evidence presented and the required changes to the Plan to make it sound.		RPLP-1844 TOR-Gleeson H17_181217 Representation.pdf RPLP-1844 TOR-Gleeson Consultation_Response_Booklet_Redacted.pdf RPLP-1844 TOR-Gleeson cover letter_Redacted.pdf
<a href="#">RPLP/2553</a>	Mr Roland Lazarus				No	No	Positively prepared; Justified; Effective; Consistent with national policy			<p>Population density data and IMD data should be incorporated into the Sustainability Appraisal.</p> <p>Baseline air quality data is required for all areas of the borough and for the range of pollutants in the air. This baseline air quality data should be incorporated into the S.A and S.E.A - The minimal result from nitrous dioxide testing alone and in one summer month only once is not sufficient. This information should then inform the need to make changes to the distribution and amount of development and or mitigation required.</p>	RPLP-2538 R Lazarus 2_Redacted 1.pdf RPLP-2538 R Lazarus 2_Redacted 2.pdf

## Habitat Regulations Assessment

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on HRA	Title
<a href="#">RPLP/1297</a>	Miss Sue Ireland				No	No	Positively prepared; Justified; Effective; Consistent with national policy		Yes this affects our future	Building to the Frithwood Area, will create Flooding down into Frithwood Lane and the connecting roads, the ditches often flood now  Do not remove ditching and hedges to the Frithwood Lane	
<a href="#">RPLP/3245</a>	Dale Farm Residents Group		Stuart Carruthers							The Basildon Council's Sustainability and Habitat Regulations Assessments are regarded as flawed due to the Basildon Council's failure to seek to meet Objectively Assessed Needs in its Revised Publication Local Plan, and failure to address environmental damage in the Dale Farm and Hovefield areas.	RPLP- 3176 Carruthers - Dale Farm - Gypsy Council_Redacted.pdf
<a href="#">RPLP/4333</a>	Mrs Sheelagh Pegg					No	Justified; Effective; Consistent with national policy	Yes		I support the comments made by Bowers Gifford and North Benfleet Parish Council. See RPLP/3690	RPLP- 4323 S Pegg_Redacted.pdf
<a href="#">RPLP/4345</a>	MR Bernard Foster					No	Justified; Effective; Consistent with national policy	Yes		I support the comments made by Bowers Gifford and North Benfleet Parish Council. See RPLP/3690	RPLP- 4334 B Foster_Redacted.pdf
<a href="#">RPLP/4237</a>	Mrs Christine Barlow					No	Justified; Effective; Consistent with national policy	Yes		I support the comments made by Bowers Gifford and North Benfleet Parish Council. See RPLP/3690	RPLP- 4228 C Barlow_Redacted.pdf
<a href="#">RPLP/4143</a>	Mr Peter Bates									I support the comments made by Bowers Gifford and North Benfleet Parish Council. See RPLP/3690	RPLP- 4132 P Bates_Redacted.pdf
<a href="#">RPLP/4175</a>	Terry Potter					No	Justified; Effective; Consistent with national policy	No		I support the comments made by Bowers Gifford and North Benfleet Parish Council. See RPLP/3690	RPLP- 4166 T Potter_Redacted.pdf
<a href="#">RPLP/4215</a>	Lorraine Smillie					No	Justified; Effective; Consistent with national policy	No		I support the comments made by Bowers Gifford and North Benfleet Parish Council. See RPLP/3690	RPLP- 4204 L Smillie_Redacted.pdf

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on HRA	Title
<a href="#">RPLP/4227</a>	Matthew Smillie					No	Justified; Effective; Consistent with national policy	No		I support the comments made by Bowers Gifford and North Benfleet Parish Council. See RPLP/3690	RPLP- 4218 M Smillie_Redacted.pdf
<a href="#">RPLP/4355</a>	Mrs Farthing									I support the comments made by Bowers Gifford and North Benfleet Parish Council. See RPLP/3690	RPLP- 4347 Farthing_Redacted.pdf
<a href="#">RPLP/3690</a>	Mrs Christine Barlow	Bowers Gifford and North Benfleet Parish Council						Yes		The Parish Council also notes the provisions and conclusions of the Habitats Regulations Assessment (HRA) in respect of policies SD2, SD3, H11 and E6. It will be able to present a more informed view on the HRA of the Local Plan at the examination using the data and analysis of the HRA of the Neighbourhood Plan.	RPLP-3676 BGNB Parish Council_redacted.pdf
<a href="#">RPLP/3246</a>	Ms Candy Sheridan	The Gypsy Council	Stuart Carruthers							The Basildon Council's Sustainability and Habitat Regulations Assessments are regarded as flawed due to the Basildon Council's failure to seek to meet Objectively Assessed Needs in its Revised Publication Local Plan, and failure to address environmental damage in the Dale Farm and Hovefield areas.	RPLP- 3176 Carruthers - Dale Farm - Gypsy Council_Redacted.pdf
<a href="#">RPLP/4202</a>	Mr Robert Smillie					No	Justified; Effective; Consistent with national policy	No		I support the comments made by Bowers Gifford and North Benfleet Parish Council. See RPLP/3690	RPLP- 4192 R Smillie_Redacted.pdf
<a href="#">RPLP/4252</a>	Mr Andrew Rickard									I support the comments made by Bowers Gifford and North Benfleet Parish Council. See RPLP/3690	RPLP- 4238 A Rickard_Redacted.pdf
<a href="#">RPLP/4322</a>	Tracey Gladwin					No				I support the comments made by Bowers Gifford and North Benfleet Parish Council. See RPLP/3690	RPLP- 4311 T Gladwin_Redacted.pdf
<a href="#">RPLP/4300</a>	Patricia Jenkinson									I support the comments made by Bowers Gifford and North Benfleet Parish Council. See RPLP/3690	RPLP- 4292 P Jenkinson_Redacted.pdf
<a href="#">RPLP/4310</a>	Mrs Connie Foster					No	Justified; Effective; Consistent with national policy	No		I support the comments made by Bowers Gifford and North Benfleet Parish Council. See RPLP/3690	RPLP- 4301 C Foster_Redacted.pdf

Rep ID	Consultee	Organisation	Agent	Organisation	Legal Compliance	Soundness	Tests of Soundness	Attend Examination?	Reason	Comment on HRA	Title
<a href="#">RPLP/4266</a>	Rita Kittle									I support the comments made by Bowers Gifford and North Benfleet Parish Council. See RPLP/3690	RPLP- 4256 R Kittle_Redacted.pdf
<a href="#">RPLP/4290</a>	Martin Dobbs									I support the comments made by Bowers Gifford and North Benfleet Parish Council. See RPLP/3690	RPLP- 4281 M Dobbs_Redacted.pdf
<a href="#">RPLP/4130</a>	Linda Bates									I support the comments made by Bowers Gifford and North Benfleet Parish Council. See RPLP/3690	RPLP- 4121 L Bates_Redacted.pdf
<a href="#">RPLP/4278</a>	Paula Wakeling									I support the comments made by Bowers Gifford and North Benfleet Parish Council. See RPLP/3690	RPLP- 4268 P Wakeling_Redacted.pdf