



Noak Bridge Parish Council

Minutes

**Held at Noak Bridge Village Hall, Coppice Lane, Noak Bridge SS15 4JS on
Wednesday the 26th March 2025 @ 7.00pm**

Present

Chairman: Cllr Mark Cottrell

Councillors: Cllr Cristopher Bateman, Cllr Jacqui Dowton, Cllr Lynn Gilliam, Cllr Peter Hawkins and Cllr Terri Sargent,

In attendance: Cllr Malcolm Buckley (Essex County Councillor), Cllr Tony Ball (Essex County Councillor), Cllr Alex Myers (Borough Councillor), Lynda Townend (Clerk) and 2 members of the public

The Chairman welcomed everyone to the meeting.

33/2025 Apologies for Absence

Apologies were received from Cllrs Paul Daft and Stuart Allen.

Resolved: the apologies were noted.

34/2025 Declarations of Interest

To receive any declarations of disclosable pecuniary interests, other pecuniary interests or nonpecuniary interests by Members relating to any agenda items.

Resolved: No declarations of interest were received from Councillors.

35/2025 Minutes

Members reviewed the minutes from the Parish Council meeting held on the 26th February covering Minutes 14/2025 to 32/2025 inclusive.

It was noted that the incorrect day of the week was printed in the minutes; 'Friday' was amended to 'Wednesday'.

Additionally, under Item 30, the location was recorded in the minutes as Hall Street, but this should read Bridge Street.

Resolved: That the minutes of the meeting held on 26th February 2025 be amended as noted and signed by the Chairman as a true record.

36/2025 Public Participation Session

A member of the public advised roadway improvements are continuing on Coppice Lane.

Cllr Peter Hawkins joined the meeting at 19.19.

A member of the public complimented the council on its Facebook page.

A member of the public advised the Noak Bridge Litter Pickers will be happy to help clear any litter left after the VE Day Celebration being held on Thursday the 8th May 2025.

The Council thanked the group for their support.

37/2025 Borough and County Councillor Reports

Cllr Malcolm Buckley provided the council with an update on County matters including:

- The Government is considering changes that may limit the public's right to object to planning applications in a bid to streamline the planning process. Confirmation of how this will affect residents is still to be confirmed.
- Locality funding will be extended into 2025/26. Cllrs Ball and Buckley will merge their allocations, creating a £20,000 fund focused on levelling up and environmental projects. Councillors are invited to submit suggestions to the County Councillors who will confirm if they meet the criteria.
- Pothole repair funding remains separate from locality funding.
- A targeted fund is available for re-painting worn lines on pelican crossings.
- Wickford Town Council has appointed a part-time handyman, which may present an opportunity for the Parish Council to purchase a set number of hours per month for local maintenance tasks.

Cllr Alex Myers provided the council with an update from Basildon Borough Council including:

- He participated in the Noak Bridge Litter Pickers' Big Spring Clean, where Basildon Borough Council collected 26 bags of rubbish.
- The Crunch, a mobile waste collection service, will be back on Saturday at Crays Hill.
- Basildon Borough Council is funding wooden edging around Coppice Lane pond and plans to install three additional dog bins in nearby locations. Cllr Gilliam reported a deteriorating dog bin, and Cllr Meyers asked her to send him the details.
- BBC is funding the installation of a notice board for the Friends of Noak Bridge.

- Area Committee funding will be the only funding available to parish councils for community-led projects.

Cllr Sargent provided the council with an update from Basildon Borough Council including:

- Concerns were raised regarding changes to parking charges and Basildon Borough Council's assertion that Parish Councils could contribute financially.
- A Council meeting was held last week, and another meeting will take place on 1st April to discuss changing the electoral cycle from every three years to every four years. A consultation was conducted, but it was poorly publicised, resulting in only 42 responses. Cllr Sargent expressed concerns, stating that this change undermines democratic rights.
- A new consultation paper has been published regarding a proposal to request the Secretary of State to cancel elections in 2026 and 2027 due to anticipated changes from the devolution process.
- Cllr Ball advised that the Secretary of State can only cancel elections one year at a time, meaning no decision has yet been made regarding 2027.

38/2025 Neighbourhood Plan Update

Cllr Sargent confirmed that the Council had agreed to fund its response to the Wash Road outline planning application from the Neighbourhood Plan budget. The Council appointed Bluestone to prepare the objection response, which can be viewed at the end of these minutes. The objection was uploaded to Basildon Borough Council's planning portal.

Cllr Sargent is liaising with Basildon Borough Council and Bluestone Planning Consultants to appoint an independent examiner. She hopes the Neighbourhood Plan will be finalised before the Benson Farm application is submitted.

Cllr Sargent also noted that the consultation remains open for submissions and queried what would happen if response numbers were low. The consultant confirmed that this would not be an issue, as the referendum is the key stage in the process.

Resolved: That the update be noted.

39/2025 Local Council Liaison Meeting

Cllrs Hawkins and Sargent provided the council with an update on the Local Council Liaison Meeting which was held on the 5th March 2025.

- Cllr Hawkins expressed concern at the language used throughout the meeting.
- Cllr Sargent advised the ABLC had serious concerns about planning matters but there was little discussion on this and how matters could be improved.
- Expressed concern regarding the chairing and format of the Local Council Liaison and how this seems to have deviated from the Terms of Reference.

Cllrs Ball and Myers left the meeting at 20.20

40/2025 Community Projects

40/2025/1 Lamp Post Flower Baskets

Cllr Downton shared a quotation from Window Flowers with Members providing a cost to install and maintain double baskets on 6 columns in Coppice Lane at a cost of £1,260. There would be a one-off additional cost of 50 brackets at a cost of £660. The terms of the agreement would see planters installed from June to September and they would be fully maintained throughout this period. Three months' notice is required to cancel the contract, and a licence will be required from Essex County Council to install the baskets on the lighting columns.

Resolved: That the Council approve the quote for an initial trial of 12 months.

Resolved: that the Clerk will apply for the licence from Essex County Council.

Cllr Ball returned to the meeting at 20.25

40/2025/2 Flower Planters

The Council received a briefing from the Friends of Noak Bridge requesting funding and support to enable the group to purchase three flower planters, compost and plants which will be installed (subject to obtaining the necessary permissions) on:

1. The verge at Eastfield Road
2. The verge at Bridge Street
3. The verge at South Wash Road – not practical but Fore St would be suitable.

Members discussed the proposed locations and agreed planters located at these locations would not be suitable, preferring a group of planters to be installed at Fore Street, where the Council is proposing to install a VE Day memorial bench.

Resolved: That the council approve a grant to the Friends of Noak Bridge of £1,000 to be used to purchase planters, compost and plants.

Resolved: That the Clerk will seek the appropriate permissions from Basildon Borough Council for a plater to be installed at Fore Street.

41/2025 Finance

41/2025/01 Accounts for Payment

The Council received and approved the following accounts for payment:

<i>Supplier</i>	<i>Item</i>	<i>Net</i>	<i>VAT</i>	<i>Total</i>
ADP Consultants	Professional services- planning objection letter	£ 360.00	£ 72.00	£ 432.00
Mrs L Townend	March Salary	£ 715.96	£ -	£ 715.96

HMRC	February tax costs	£ 210.60	£ -	£ 210.60
HMRC	March tax costs	£ 184.80	£ -	£ 184.80
SLCC	Membership fees	£ 78.00	£ -	£ 78.00
Noak Bridge Community Association	March Hall Hire	£ 50.00	£ -	£ 50.00
Sarah Physical Trade Ltd	VE Day 80 flags	£ 44.74	£ 11.18	£ 55.92
Royal British Legion Industries	VE Day 80 bunting and lamppost signs	£ 173.23	£ 34.64	£ 207.87
Noak Bridge Litter Pickers	Litter picking equipment	£ 509.38	£ -	£ 509.38
AGA Print - Solopress	Spring Newsletter printing	£ 189.97	£ -	£ 189.97
TOTAL:				£ 2,634.50

Resolved: That the accounts for payment for March be approved.

41/2025/02 Bank Reconciliation

The council received and **noted** the bank reconciliation to the end of February 2025.

41/2025/03 Monthly Budget Sheet

The Council received and **noted** the budget comparison to the end of February 2025 and noting, in the 2024/25 financial year the council had spent £46,515.37, 38% of the 2024/25 budget.

41/2025/04 Bank Signatories

Councillors were asked to appoint an additional signatory to the Metro Bank account to ensure payments would be made according to the process laid out in the Council's Financial Regulations (two councillors to approve a payment).

Resolved: That Cllr Bateman BE included as a signatory on the Metro Bank Account to view online transactions and authorise payments only. There is no requirement to withdraw cash or need a debit card.

Cllrs Ball and Buckley left the meeting at 20.44

41/2025/05 Council's Saving Account

Councillors received a report recommending the Council diversify its deposits to ensure all funds are protected by the Financial Services Compensation Scheme and achieve a greater return for their investments and discussed the options presented and which councillors would be signatories on the account.

Resolved: That the Parish Council will open a 12-month Term Deposit account with Unity Trust Bank and a separate instant access servicing account. Once opened the Council will transfer £50,000 from the Santander Business Savings account to fund the Term Deposit account.

Resolved: That the Council agreed the signatories on the new accounts would be Cllr Christopher Bateman, Cllr Jacqui Downton and Cllr Lynn Gilliam.

41/2025/06 Payment of Tax and NI Costs to HMRC

Councillors received and discussed a report recommending a variable direct debit is set up to ensure payments due to HMRC are paid promptly.

Resolved: That the Council agreed to set up a variable direct debit on the Santander Bank Account to pay tax and NI payments to HMRC.

A member of the public left the meeting at 21.00

42/2025 Asset Register Review

Councillors were asked to review the Fixed Asset Register.

Resolved: That Cllr Paul Daft will inspect each item on the list, take a photograph of the asset, update the list and send this to the Clerk by Friday the 4th April 2025.

Cllrs who have assets stored in their homes will do likewise.

43/2025 VE Day 80 Event

Cllr Cottrell updated the council on the plans so far and the work undertaken so far, including:

- The application to access the field has been submitted to Basildon Borough Council.
- Quotes are being sought for a contractor to service and light the beacon.
- The Noak Bridge Public House is keen to be involved serving sandwiches and soft drinks on the green. Cllr Bateman will confirm the exact requirements and set up a WhatsApp group to include all those involved in the event.
- V Dub Coffee Bar has agreed to attend the event at no charge to the Council.
- The Fish and Chip van has agreed to attend the event from 7.30pm at no charge to the Council.
- A piper will play before the beacon lighting.
- St Johns Ambulance had agreed to cover the event with two first aiders at no cost to the Council. A gazebo will need to be set up for the volunteers.
- Cllr Sargent will speak to the school to request the children sing an appropriate song at the event.
- Three quotes for the hire of a generator and flood lighting have been obtained from 4 suppliers ranging in price from £104 to £175.

Resolved: That the council appoint Mark One Hire to supply the generator and flood lights at a cost of £103.20.

- The Council will not be providing any give aways at this event.
- The Clerk will print and post 10 copies of an event poster to Cllr Gilliam for distribution.

44/2025 Planning

44/2025/1 The Council **noted** the objection response to planning application 25/00171 submitted by to Basildon Borough Council on the 21st March 2025. [Attached](#).

The Council considered the following planning application published by Basildon Borough Council and the publication of the agenda for this meeting:

44/2025/2 25/00272/TPOBAS TPO/09/98 – 2 metre reduction on the oak tree at 5 Handley’s Chase Noak Bridge.

Resolved: That the Council had no objection to the application.

44/2025/3 The Council noted planning decisions made by Basildon Borough Council 24/01383/FULL single storey side extension at 211 Crouch St Noak Bridge.

GRANTED

25/00055/TPOBAS crown reduction of oak tree by 2m to 2.5m at 2 Kimberley Drive Noak Bridge. **GRANTED**

45/2025 Consideration of Contracting a Handyman for Village Maintenance

The Council considered contracting a handyman for village tasks such as sign cleaning and hedge trimming.

Resolved: That the Council will contact the handyman who recently repaired the Little Libraries to enquire if they had capacity for additional work.

Resolved: That the Clerk would also see quotes from interested parties including contacting Wickford Town Council to ascertain if their handyman would have capacity for additional work.

46/2025 Correspondence

No correspondence was received.

47/2025 Date of Next Meeting

The next meeting will be the annual parish meeting which will take place on the 23rd April 2025 commencing at 7.00pm, in the village hall.

There being no further business, the Chairman closed the meeting at 21.26

Signed: _____

Date: _____

Cllr Mark Cottrell



Planning Services
Basildon Borough Council
The Basildon Centre
St Martin's Square
Basildon
Essex
SS14 1DL

Email: planning@basildon.gov.uk

FAO: Ellie Hendry

21 March 2025

Dear Ms Hendry,

Objection to Application ref: 25/00171/OUT on behalf of Noak Bridge Parish Council

Description: Hybrid application for a phased development of up to 300 residential dwellings (C3 Use Class) to include 1. Detailed application (Phase 1) for the first 100 dwellings, new vehicular and pedestrian accesses from Wash Road, provision of green infrastructure including a new community park, resident allotments, surface water drainage basins, swales and foul water pumping station, all hard and soft landscaping works, residents and visitors car parking and 2. Outline application (Phases 2 and 3), for up to 200 residential dwellings, community use buildings, surface water drainage basins, a second foul water pumping station, new vehicular and pedestrian accesses from Wash Road, and all associated infrastructure works.

Location: Land At Wash Road Junction With Bridge Street Wash Road Laindon Essex

Bluestone Planning is instructed by Noak Bridge Parish Council (NBPC) to advise on a consultancy basis in respect of the above matter. This letter outlines the objections that NBPC wishes to raise in connection with the current hybrid planning application at the above site.

This letter sets out the reasons for this objection to the current hybrid planning application. We trust that the Local Planning Authority (LPA) will attach appropriate weight to the matters discussed below and that they will take them into account during the determination of this application.

Neighbourhood Plan Considerations

The Noak Bridge Neighbourhood Plan (NBNP) was submitted for examination (Regulation 16) on 24th February 2025. Whilst the draft policies of the NBNP have not been reviewed by the Independent Examiner yet, it is considered that the relevant draft policies should be material to the determination of this planning application. This is due to:

- 1) the NBNP has already been subject to extensive public consultation during the Pre-Submission Stage (Regulation 14) and in the representations that were made there were no strong objections against the draft policies; and
- 2) the NBNP will most likely be made by the time the LPA determines this planning application.

Accordingly, it is considered that the relevant draft policies of the NBNP should attract moderate weight in decision making, until the Independent Examiner sends their comments which will then mean that full weight can be afforded.

Housing

The NBNP has adopted a positive approach when seeking to meet the housing need for the local area and has made specific provisions to ensure that an identified housing need, if there is any, can be met within the NBNP period. This is reflected from NBNP draft policies NB1 and NB5.

It is significant to note that no housing need was identified during the preparation of the NBNP and that is why it was decided to not allocate any sites for residential development. The applicant's agent does not appear to dispute this and instead seeks to justify this proposed development by arguing that it will help with meeting the Borough's unmet need for this particular type of development.

Even if there was an identified housing need within the parish area, this would have already been met in full by the development that was recently approved to the south of Wash Road (23/01551/OUT). Noak Bridge is a small village with a population of only 2,800 people and the approved development will result in the addition of 400 new homes, which will comprise a mix of housing, including affordable and associated infrastructure. NBPC cannot therefore support this

proposed development when it could lead to the creation of 300 additional homes on top of the 400 that were approved, as this would introduce an increase in population that is more than half of the existing one. This scenario is not considered to be sustainable, as existing and future proposed local services and facilities would be totally overwhelmed.

NBNP draft policy NB1 highlights that infill development will be supported within the built-up area of the village. Paragraph 6.1.8 also makes clear that:

“Any housing development outside the built part of the settlement will be resisted unless it is allocated in a development plan document or meets one of the exceptions in the NPPF”

The NBPC considers that the proposed development does not meet any of the exceptions mentioned in paragraphs 84 and 154 of the NPPF, and therefore conflicts with policy NB1.

Given that the proposed development also does not meet any of the exceptions of paragraph 154 of the NPPF and no very special circumstances have been demonstrated, it is also considered to be contrary to policy NB5.

Important Views

In addition, the site lies within Important View V09, which is considered one of the best long range views in the Parish. The Wash Road fields to Barleylands / Views over Benson Farm were determined to be extremely important to the local community.

Policy NB11 – Important Views states that:

“Development proposals should preserve or enhance the local character of the landscape and through their design, height and massing should recognise and respond positively to the various Important Views. Development proposals which would have a significant adverse impact on an identified Important View will not be supported.”

The Character Appraisal supporting the Neighbourhood Plan makes it clear that the view is of Significant Value (the highest level available) and states:

“This view is considered highly sensitive to new intensive or major development as it would result in the narrowing of the gap between Billericay and Basildon as a whole.”

In consideration of the above, it is clear that the development as proposed would be in conflict with Policy NB11.

Design

The neighbourhood Plan and its design policies and code were devised to protect the unique conservation area and its setting and to maintain the high standards of development as originally envisaged for the area. Although this is an outline application for the remaining phases, the

information to accompany the detailed element of the application does not reflect the quality expected in this part of the Parish.

On the edge of the Conservation Area, this site plays a key role in its setting. In particular the approach into Bridge Street with its landmark buildings. The information submitted shows a generic housing estate development, with little to no reference to the locally specific details as set out in the Design Code or Character Appraisal documents.

Policy NB15 – Design Principles sets out:

“New development should contribute to the creation of high-quality places through a design-led approach to development underpinned by good practice principles and reflecting a thorough site appraisal and demonstrate how it preserves and enhances features that define the character of the individual area, as set out in the Noak Bridge Design Code.”

The Design Code accompanying the application analyses the context of the area, but the output does not accord with the analysis, with standard modern house types, poor quality materials and low levels of detailing supplied. The proposal is considered to not meet the standards of design expected for such an important site on the edge of the Conservation Area.

The original development which is now a Conservation Area, is successful due to a combination of the level of detailing, appropriate building form, choice of high quality materials and plentiful landscaping. In this regard, it is considered that the proposed scheme does not reflect the high standard of design that is required.

Equally, it is clear that the proposal does not appear to have its own unique identity or create a high quality development as required. As proposed, it would not preserve or enhance the identified features that define the character of this area.

The NBPC kindly requests from the LPA to take into account the points addressed above, as granting planning permission to the proposed development will severely undermine policies NB1 and NB5 of the NBNP and as a consequence, will be contrary to the Development Plan as a whole.

Grey Belt

According to paragraph 143 of the NPPF, Green Belt serves five purposes. These are the following:

- a) *“to check the unrestricted sprawl of large built-up areas;*
- b) *to prevent neighbouring towns merging into one another;*
- c) *to assist in safeguarding the countryside from encroachment;*
- d) *to preserve the setting and special character of historic towns; and*
- e) *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

The applicant’s agent has reviewed the Basildon Green Belt Study (December 2023) that forms part of the evidence base documents informing the emerging Local Plan and they have undertaken

their own assessment to identify the harm from the proposed development to the Metropolitan Green Belt. They have concluded that the application site does not strongly contribute to any of purposes (a), (b) or (d) in paragraph 143 of the NPPF. And therefore the application site meets the definition of 'Grey Belt', which is a concept introduced by the new government in December 2024.

In Annex 2: Glossary of the NPPF, Grey Belt is defined as:

"..land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey Belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."

The applicant's agent assessment, however, is not in line with the recent guidance published by the government on how should the contribution land makes to the relevant Green Belt purposes should be assessed. Whilst, it is appreciated that this guidance was published after the planning application was submitted, it was considered critical in deciding whether the application site can be defined as Grey Belt.

Paragraph 005 Reference ID: 64-005-20250225 of the Planning Practice Guidance (PPG) states:

"Purpose A – to check the unrestricted sprawl of large built up areas

This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas.

Contribution Illustrative features

Strong Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development.

They are also likely to include all of the following features:

- be adjacent or near to a large built up area*
- if developed, result in an incongruous pattern of development (such as an extended "finger" of development into the Green Belt)*

Moderate Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land's contribution to this purpose a, such as (but not limited to):

- having physical feature(s) in reasonable proximity that could restrict and contain development*
 - be partially enclosed by existing development, such that new development*
-

Contribution Illustrative features

would not result in an incongruous pattern of development

- contain existing development
- being subject to other urbanising influences

Weak or None Assessment areas that make only a weak or no contribution are likely to include those that:

- are not adjacent to or near to a large built up area
- are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development”

The application site lies adjacent to our village, which forms an extension of Basildon’s built up area. NBPC considers that the application site contributes strongly to purpose A, as it lies adjacent to a town’s (Basildon) built-up area and there are no physical features from the west, north and east that would prevent its expansion and would result in an incogruous pattern of development. Whilst it is appreciated that the proposed development seeks to develop only a part of the application site with the land to the north staying open for recreational purposes, it is considered that any future paraphernalia are likely to have an adverse harm to the openness of the Green Belt. **Accordingly, the NBPC considers that the application site contributes strongly to purpose (a) of paragraph 143 of the NPPF.**

“Purpose B – to prevent neighbouring towns merging into one another

This purpose relates to the merging of towns, not villages.

Contribution Illustrative Features

Strong Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features:

- forming a substantial part of a gap between towns
- the development of which would be likely to result in the loss of visual separation of towns

Moderate Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to):

Contribution Illustrative Features

- forming a small part of the gap between towns
 - being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation
-

Weak or None Assessment areas that contribute weakly are likely to include those that:

- do not form part of a gap between towns, or
- form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation”

With regards to purpose (b), the NBPC considers that due to the size of the application site and its proximity to the built-up area of Great Burstead the contribution that can be attributed to this purpose is moderate.

Purpose D – to preserve the setting and special character of historic towns

This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.

Contribution Illustrative Features

Strong Assessment areas that contribute strongly are likely be free of existing development and to include all of the following features:

- form part of the setting of the historic town
- make a considerable contribution to the special character of a historic town.

This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town

Moderate Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to):

- being separated to some extent from historic aspects of the town by existing development or topography

Contribution Illustrative Features

- containing existing development
 - not having an important visual, physical, or experiential relationship to historic aspects of the town
-

Weak or None Assessment areas that make no or only a weak contribution are likely to include those that:

- do not form part of the setting of a historic town
 - have no visual, physical, or experiential connection to the historic aspects of the town
-

Given that the application site does not form part of the setting of a historic town (Basildon), the NBPC considers that weak/none contribution can be attributed to this purpose.

The NBPC considers that the application site clearly contributes strongly to the first purpose (a) of the Green Belt, and therefore it cannot be defined as Grey Belt. Even if it were to be accepted that its contribution to purpose (a) is moderate, it is still considered that the application site cannot qualify as Grey Belt because it falls within the excluded land described in footnote 7 of the NPPF. Footnote 7 states:

*“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, **Local Green Space**, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and **areas at risk of flooding or coastal change**” (own emphasis).*

The application site includes land which is proposed in the NBNP as Local Green Space (LGS8). As highlighted in the Local Green Space Assessment supporting our NP, LGS8 was proposed to be designated as a LGS because it *“provides instant access to the open countryside and Rights of Way network beyond as well as important views towards the wider countryside”*.

This proposed LGS designation did not attract any objections during Regulation 14 consultation, and therefore NBPC considers that it is reasonable to expect that the Independent Examiner will choose to retain it.

The proposed development shows the creation of a new footpath passing through LGS8, which will undoubtedly adversely harm the character of the area and how it is enjoyed by local residents, including a negative impact on views experienced from public points into the open countryside. Therefore, NBPC considers that this constitutes a strong reason for refusing or restricting the proposed development.

Further, the application site is located in an area that has identified by the Environment Agency (EA) to be at high risk from surface water flooding. This is also agreed by the applicant's agent in paragraph 2.37 of their planning statement. The Drainage and Flood Risk assessment accompanying this planning application states in paragraph 3.7.1 that *"neither a Sequential Test nor an Exception Test will be required."* The NBPC does not agree with this conclusion, as the government has issued clear guidance stating that **all sources of flooding** should be considered when proposed new development. Paragraph 023 Reference ID: 7-023-20220825 makes clear that:

"What is the aim of the sequential approach?"

*The approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, **development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding.**"* (own emphasis)

Paragraph 175 of the NPPF also adds that:

"The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)."

The applicant has failed to undertake a sequential test to inform the proposals, which is evident from the proposed layout which includes new residential development on areas at medium and high risk of surface water flooding. This specific area was also identified in our NP as particularly vulnerable to surface water flooding, and therefore the proposed development would conflict with draft policy NB12. Accordingly, the NBPC considers that this flood risk issue has not been addressed adequately by the applicant and as a consequence constitutes a strong reason for refusing or restricting development.

The graph of paragraph: 007 Reference ID: 64-007 20250225 of the PPG makes clear that Green Belt land can be defined as Grey Belt, only if **both** of the requirements described in the glossary of the NPPF are met. It is the opinion of the NBPC that the neither of these are met in this instance for the reasons described above. Accordingly, the application site cannot be identified as Grey Belt.

NBPC considers significant to also draw the case officer's attention to paragraph 008 Reference ID: 64-008-20250225 which states:

“How can the impact of releasing or development on the remaining Green Belt in the plan area be assessed?”

A Green Belt assessment should also consider the extent to which release or development of Green Belt land (including but not limited to grey belt land) would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole.

In reaching this judgement, authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way.”

The applicant's agent alleges that the application site makes a moderate to no contribution to all of the five purposes of the Green Belt due to its size, location and surroundings and the assessment that was previously undertaken by the LPA is inaccurate as it assessed a larger parcel of Green Belt land in which the application site forms a small part of.

NBPC considers that paragraph 8 of the PPG makes clear that even when such cases occur, it is significant to ensure that the release of any Green Belt land will not **fundamentally undermine** all of the purposes of the remaining Green Belt. In this instance, NBPC considers it is evident that the release of the application site from the Green Belt will fundamentally undermine the purposes of the remaining Green Belt for all of the reasons highlighted earlier above, and therefore the proposed development should be refused.

Very Special Circumstances

The application site lies within the Metropolitan Green Belt. The proposed development does not meet any of the exceptions of paragraph 154 of the NPPF, and as highlighted earlier it can also not be identified as Grey Belt. Therefore, the proposed development does not meet all of the requirements of paragraph 155 of the NPPF and constitutes inappropriate development in the Metropolitan Green Belt.

Paragraph 153 of the NPPF highlights that:

“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green belt, including harm to its openness. Inappropriate development, is by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘Very special circumstances’ will not exist unless the potential harm to the Green belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”

The applicant's agent presents in paragraph 6.43 to 6.50 a number of alleged positive benefits that they state constitute VSC. NBPC has reviewed these and considers that the following cannot be considered as benefits, and therefore do not constitute VSC.

"The site is immediately deliverable within the first 5 years of new Local Plan period and this should be given very significant positive weight."

No evidence has been provided to back this up and provide certainty, and therefore it should attract limited to no positive weight.

"The proposal would result in the utilisation of a sustainable and deliverable site to help meet the LPA's development needs and this should be given significant positive weight."

This alleged benefit is similar, if not identical, to the above. The LPA is currently in the final stages of preparing their emerging Local Plan which seeks to meet the housing need of the wider area. Accordingly, it should afford limited to no positive weight.

"The provision of public open space including a publicly accessible community park, orchard, allotment, drainage basins and walking routes should be given moderate positive weight."

The village already benefits from a surplus of open green and community spaces that are relatively in fair to good condition, as evidenced by the Community Facilities Assessment supporting the NBNP. Therefore, the proposed community areas do not seek to meet an identified deficiency and as a consequence, this element should attract limited positive weight.

"The provision of traffic calming measures, new footpaths and highways improvements to Wash Road should be given moderate positive weight."

The reason these are proposed and needed is due to the influx of a significant number of people that could live in the village, should the proposed development be granted planning permission. The applicant has not submitted any evidence showing that there are existing road safety concerns on that particular area. Therefore, this can be classified as a mitigation measure and not a benefit. Accordingly, it should attract no positive weight.

"The creation of modern, energy efficient buildings incorporating renewable energy technologies. should be given moderate positive weight."

NBPC considers that this should attract limited to no positive weight, as it is a national and local requirement to ensure that new development proposals aim to tackle the effects of climate change.

"Provision of on-site community buildings / facilities (subject to further discussions) should be given limited positive weight given their uncertainty."

As highlighted earlier above, NBPC considers that where there is a level of uncertainty associated with any alleged benefits, then these should attract no positive weight.

By taking the above together with the rest alleged positive benefits that are put forward by the applicant, NBPC considers that it is evident that there are no VSC that could outweigh the substantial harm caused from the proposed development to the Green Belt, including its openness.

Conclusions

NBPC considers that it has been demonstrated that the proposed development is proposed on land that cannot be defined as Green Belt. Given that the type of development proposed does not meet any of the exceptions listed in paragraphs 154 and 155 of the NPPF, it means that it constitutes inappropriate development in the Green Belt.

Inappropriate development is considered by definition to be harmful to the Green Belt, including its openness as highlighted in paragraph 153 and should not be approved unless VSC exist. In this instance, NBPC considers that it has also been demonstrated that the VSC brought forward by the applicant are not sufficient to outweigh the substantial harm to the Green Belt.

Further, the proposed development has also been demonstrated to be contrary to NBNP policies NB1, NB5 and NB12. It is considered that significant negative weight should also be attached to the conflict identified with these policies. This significant negative weight is not considered to be outweighed by the alleged positive benefits that will be delivered from the proposed development.

Therefore, after due consideration of the submitted documents and plans, it is respectfully requested that the planning application is recommended for refusal.

Yours sincerely,

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