Basildon Borough Council

Revised Publication Local Plan Statement of Consultation

March 2019





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1. Introduction

- 1.1 This Statement of Consultation sets out how Basildon Borough Council carried out its consultation process on the Revised Publication Local Plan in 2018. The report explains how the consultation was promoted, how people were engaged and how information was made available for residents and other stakeholders. It also summarises the results of the consultation and identifies the main issues that were raised.
- 1.2 The consultation on the Revised Publication Local Plan and the preparation of this Statement of Consultation are in accordance with national planning policy and guidance, the Planning and Compulsory Purchase Act 2004, the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the Council's Statement of Community Involvement (SCI): Second Edition 2016.

2. Consultation Requirements

- As part of the preparation of the Local Plan, the Council is required to consult at key stages in the plan's development. Previously, the Council carried out a number of public consultations, in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 between 2012 and 2016, where members of the public, key stakeholders and other interested parties were invited to make representation on various options regarding the development strategy, potential sites and policy. The public consultation carried out in 2007 was conducted in the same way but in accordance with Regulation 25 of the *former* Town and Country Planning (Local Development) (England) Regulations 2004. The representations received during all of these consultations have influenced the preparation of the Local Plan and more specifically what the latest version, the Revised Publication Local Plan, is proposing.
- 2.2 The Revised Publication Local Plan is considered by the Council to be the version it would like to adopt and as such it is the version it intends to submit to the Secretary of State for examination. Prior to submission, the Council is required under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 to formally publish the Local Plan and its supporting documents so they can be viewed by the public, key stakeholders and other interested parties. This stage is commonly referred to as the Regulation 19 consultation and during publication anyone may make a representation about the final draft of the Local Plan. All representation received during this consultation stage fall under Regulation 20 and will be submitted to the Secretary of State along with the Revised Publication Local Plan and supporting documents, and considered as part of the examination.

- 2.3 The specific requirements for this consultation are set out in Regulation 19 which states what the Council must do in terms of publicising the Local Plan, and Regulation 20 which sets out the requirements for making representations. They are as follows:
 - 19.— Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must—
 - (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and
 - (b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).
 - 20.—(1) Any person may make representations to a local planning authority about a local plan which the local planning authority propose to submit to the Secretary of State.
 - (2) Any such representations must be received by the local planning authority by the date specified in the statement of the representations procedure.
 - (3) Nothing in this regulation applies to representations taken to have been made as mentioned in section 24(7) of the Act.
- 2.4 This Statement of Consultation also shows that the consultation and public engagement was carried out in line with the approach set out in Council's adopted SCI. The SCI specifies the consultation process for all planning procedures by Basildon Borough Council, including the preparation of local planning policies.
- 2.5 The main points of the SCI are:
 - 1. Any person, organisation or company can be involved in the engagement and consultations that will happen as the Council prepares its Local Plan:
 - 2. The scale of consultation varies with the type of document being produced and the range of consultation methods used will be based on their appropriateness and the availability of resources;
 - 3. Planning Regulations set out the minimum requirements for consultation but the Council will strive to exceed them;
 - 4. The Council will attempt to ensure that the consultation is inclusive by

- a. making consultation documents available in different formats (i.e. electronic and in paper copy);
- b. ensuring venues and events are accessible to everyone including people with disabilities, older people with mobility issues and people with pushchairs; and
- c. making efforts to encourage those whose are seldom heard to make their views known.
- 2.6 The SCI also requires the evidence base and, as a minimum, the Strategic Environmental Assessment and Service Impact Assessment to be made available alongside the consultation document for all stakeholders to consider.

3. Previous Consultation on the Local Plan

Core Strategy Issues Report 2007

- 3.1 At an early stage in the preparation of the Local Plan Core Strategy, the Council prepared and undertook public engagement on an Issues Report. The purpose of this consultation was to ensure that the needs and concerns of stakeholders and the community could be identified and reflected in the preparation of the Local Plan Core Strategy.
- 3.2 The Issues Report published for consultation between October and November 2007 asked 45 questions on a range of different matters for the Borough. 2,177 comments were received from 103 consultees and the Council sent responses to all of them. One of the main concerns raised was that the Core Strategy needed to be more strategic and focused in future iterations.

Core Strategy Preferred Options Report 2012

- 3.3 In light of the comments received on the Issues Report, Basildon Borough Council carried out a series of projects, technical studies and engagement activities to determine the strategic issues of the Borough. This work was used to prepare the Core Strategy Preferred Options Report.
- The Preferred Option for future development of the Borough, as chosen by the Council, was based on maximising urban potential and protecting the Green Belt. This option valued the Green Belt above all other considerations and made its protection the priority for the future. As such this option provided for an additional 6,500 homes and a further 6 hectares of employment land within the urban area.
- 3.5 The Core Strategy Preferred Options Report was published for a 6 week public consultation between February and April 2012. The consultation put forward 60 questions asking for comments on the vision, strategic objectives,

- plan period, the options, Primary Areas for Development and Change (PADC), individual policies and the regulatory assessments (consisting Sustainability Appraisal/ Strategic Environmental Assessment/ Habitat Regulations Assessment and Service Impact Assessment).
- 3.6 Approximately 3,300 comments were received from 370 consultees including an area specific petition with 2,032 signatures. The main issues raised were the scale of growth and the soundness of the Preferred Option. The scale of growth received mixed views; where the majority of communities supported no Green Belt development, whilst statutory bodies, developers and partners felt that the scale of growth was not in line with national policy and guidance. Consequently, it was felt that the scale of growth proposed in the Core Strategy Preferred Options would not be found sound at future Examination.

Core Strategy Revised Preferred Options Report 2014

- 3.7 Having regard to the conclusions reached in respect of the Core Strategy Preferred Options, a Revised Preferred Options Report was published for consultation purposes in January 2014, with consultation responses accepted until the April of 2014. This proposed the provision of 16,000 homes, assessed to be the OAN for housing at that time, and 49ha of employment, the need for which was identified through the Employment Land and Premises Review. As with the earlier consultation, comments were welcomed on the vision, strategic objectives, plan period, the options, Primary Areas for Development and Change (PADC), individual policies and the regulatory assessments (consisting Sustainability Appraisal/ Strategic Environmental Assessment, Habitats Regulation Assessment and Service Impact Assessment).
- 3.8 The consultation on the Core Strategy Revised Preferred Options Report gave rise to over 10,000 consultation comments covering a range of issues. A common issue arising was the need for more detail to be provided around the allocation of land to meet the need for development and change going forward, and the infrastructure required to support such growth. A comprehensive approach to plan-making which incorporated not only the preparation of a spatial strategy and strategic policies, as the Core Strategy was designed to do, alongside the allocation of land and the preparation of development management policies was identified as a mechanism by which this additional detail could be provided to the satisfaction of consultees. This gave rise to the change of approach taken in December 2014 when the Council determined it would prepare a single Local Plan.

Dunton Garden Suburb 2014-2015

- 3.9 During the preparation of the first draft of the Local Plan the Council undertook work in partnership with Brentwood Borough Council, as part of the Duty to Cooperate, to explore a potential cross-boundary development opportunity to the west of Laindon (Basildon Borough) and east of West Horndon (Brentwood Borough).
- 3.10 An informal planning concept was prepared which looked at the issues, location merits and constraints of the potential Dunton Garden Suburb. The document proposed 4,000 to 6,000 homes together with retail and leisure uses, Gypsy and Traveller pitches, commercial buildings, open spaces, local facilities and improved infrastructure routes. It was subject to a joint 10 week public consultation between 6 January and 17 March 2015 and whilst not being a formal part of either Council's Local Plan preparation the consultation was undertaken in accordance with Regulation 18.
- 3.11 1,528 representations were received during the consultation period from nearly 1,400 consultees. The majority of the representations were objections to the proposals with a number of issues and concerns being raised. This indicated a need for additional evidence to demonstrate that the larger area was the most appropriate location for development for both Boroughs and that the scale of development could be supported by appropriate infrastructure. Due to insufficient evidence provided by Brentwood Borough Council to indicate that it was the most appropriate location for development in their area, the Council did not include this proposal as a preferred allocation within the first draft of its Local Plan.

Draft Local Plan 2016

- 3.12 On 7 January 2016, the Council approved public consultation on the first draft of the Local Plan. Subsequently, an eight week public consultation commenced on 28 January, running until 24 March 2016. The Draft Local Plan comprised the full suite of strategic policies, allocation policies and development management policies which set out the overall proposed framework for the development of the Borough up to 2034. It included a preferred approach and also a series of alternative options for every policy.
- 3.13 The consultation generated much public interest and remained a topical subject in local and social media throughout its duration. Over 2,200 people attended eleven public exhibitions held around the Borough, together with a further 500 attending special Parish Council meetings, business breakfasts and special interest forums where information on the Draft Local Plan was presented and the possible implications for different locational areas was discussed. Around 21,600 individual comments were received during the consultation period by more than 3,800 consultees.

3.14 A range of issues and comments relating to all aspects of the plan were raised during the consultation and the Council produced a Statement of Consultation setting out 52 key actions that would need to be undertaken in order to progress the Local Plan to publication and submission. These included revising existing evidence, undertaking new studies, and carrying out a further round of consultation on sites put forward for development.

Local Plan New and Alternative Sites 2016

- 3.15 As part of the consultation on the Draft Local Plan, representations were received from developers and landowners in relation to specific sites and alternative proposals. In order to formally consider these proposals, and consequently the alternative options for the distribution of development across the Borough, the Council approved a further round of consultation on 29 September 2016.
- 3.16 The consultation on the new and alternative sites ran for six weeks from 3 November to 15 December 2016. The consultation documents consisted of a Summary Document produced by the Council which set out the purpose and scope of the consultation and a list of the seventeen sites; a map of new and alternative sites, also produced by the Council; and the promotional material and representations submitted during the Draft Local Plan consultation for each new/alternative site by site promoters, developers and/or landowners.
- 3.17 As this Regulation 18 consultation focused on these seventeen sites only, comments were only welcomed on the seventeen new/alternative options for sites being promoted and the cumulative impacts of these proposals when considered alongside other sites proposed within the Draft Local Plan. The consultation gave rise to 1,650 individual comments that were made by 814 contributing consultees. As a result of the issues raised a further seven actions were identified and approved by Council in order for the Local Plan to progress to the next stage.

4. The Revised Publication Local Plan 2018

Preparation

4.1 On 22 March 2018, Council agreed the publication and submission of the Publication Local Plan to the Secretary of State in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) Regulations 2012, (as amended). This version of the plan had evolved from the Draft Local Plan and incorporated the outcomes of the 59 actions agreed by Council following the Draft Local Plan and New and Alternative Sites consultations.

- 4.2 Following a change of leadership of the Council in May 2018, the Council agreed a motion to rescind the previous decision to publish and submit the Publication Local Plan, at an extraordinary meeting of the Council on the 7 June 2018. They instructed a review of seven specified components of the plan to be undertaken and once complete the plan was to be taken back to Council for consideration.
- 4.3 The focused reviews were carried out and on 18 October 2018, the Council approved the publication of a revised Local Plan, called the Revised Publication Local Plan, for consultation and submission to the Secretary of State in accordance with the relevant legislation and the Council's Local Development Scheme 2018-2020.

Consultation

4.4 The six week public consultation of the Revised Publication Local Plan, its Policies Map, Sustainability Appraisal (incorporating the Strategic Environmental Assessment), Habitats Regulation Assessment and Service Impact Assessment launched on 1 November 2018 and closed at 5pm on 17 December 2018. In addition, the evidence that had informed the preparation of the Local Plan was also published as part of the consultation.

Communication and Engagement

- 4.5 The Council went over and above the publicity and support requirements of the Regulations and the SCI in order to ensure a high level of engagement could be achieved. This included:
 - Local Press, Council Communications and Social Media Advertisements
- 4.6 The Council published three press releases at the beginning, middle and end of the consultation to promote the consultation and advise people how they could get involved.
- 4.7 The Public Notice and Statement of Representations Procedure which is required under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, was placed in the Basildon Echo and Yellow Advertiser newspapers and online during the consultation. A copy of the notice in the Echo is provided in Appendix A.
- 4.8 To supplement this, eight half page, colour graphic adverts were placed in the Basildon Echo, Yellow Advertiser, Billericay and Wickford Gazette and Essex Enquirer newspapers during the consultation period. Adverts during November 2018 publicised the advice sessions in addition to the consultation while the adverts during December 2018 publicised key information regarding the consultation only. Copies of the adverts are provided in Appendix A. Seven news stories across local media groups were

- communicated during the 6 week consultation which would have also helped raise the profile of the consultation.
- 4.9 The consultation was also promoted via 34 tweets on the @BasildonCouncil Twitter, 33 Basildon Council Facebook posts and several stories on the Basildon Council LinkedIn account, generating more than 117,000 screen views. Examples are shown in Appendix A.
- 4.10 A paid Facebook advert was also issued to local users to raise awareness of the consultation, which as of 17 December 2018, had triggered 54,600 screen views, reaching 18,800 people. This alone can be attributed to 1,260 clicks to the Local Plan webpages. The Council also proactively posted in local Facebook groups to raise awareness and these groups and their member numbers are shown in Table 1.

Table 1: Facebook Groups notified directly about the consultation

Local Facebook Group	Member Total
Basildon Exposed	15,240
Wickford Chit Chat	16,612
Billericay Discussion	29,830
Wickford Community Chat	10,867
Basildon Memories	17,467
Billericay Discussion +	2,866
Vange Hill Community	490
Total	93,372

- 4.11 A banner advertising the consultation was also displayed on the Council's website homepage (www.basildon.gov.uk). This played a dual function of providing a clear route to the consultation for those looking for information on the homepage, whilst also promoting the consultation to those visiting the council's website for other purposes. This method had been used successfully for previous consultations.
- 4.12 The Council advertised the Local Plan consultation within the Council's 'together' Magazine winter 2018 edition which was printed and distributed to 78,000 households within the Borough, available to pick up from the Basildon Centre and also published online. An audio version of the magazine was also available by the Wickford and District Talking Newspaper for blind and visually impaired residents. A copy of the magazine advert is shown in

Appendix A. Information about the consultation, including the web link, also featured within the Local News e-newsletter (shown in Appendix A) which was sent to more than 1,100 subscribers on 19 November 2018 and was the most clicked link of the bulletin.

Direct Notification

- 4.13 Over 9,000 consultees were written to including all statutory consultees, such as the Environment Agency and Essex County Council, a range of non-statutory groups, such as Essex Wildlife Trust and RSPB, other stakeholders with an interest in the borough, such as developers and businesses, and also any members of the public that had provided responses to earlier consultations, or had registered to be kept informed.
- 4.14 The communication included information about the consultation, where they could view documentation in person and online, the offer of advice sessions and instructions of how to book them, the ways in which they could respond to the consultation and what would happen after the consultation closed.

Business Engagement

- 4.15 The Planning Policy Team had a stand at the Basildon Business Expo held at the Holiday Inn, Basildon on 22 November 2018 to raise the profile of what the Local Plan could do for businesses and investment in the future and encourage business leaders to respond. More than 230 visitor tickets were sold in advance of the event and 54 other businesses were exhibiting.
- 4.16 An article on the Local Plan consultation was also included within the Bas for Business e-newsletter on 4 December 2018, a copy of which is in Appendix A. This was sent to more than 2,300 local business subscribers.
- 4.17 On 5 December 2018 a member of the Planning Policy Team attended a Basildon Business Group meeting where a presentation was given to representatives of key business and partner organisations within the Borough about the plan, the consultation and how to respond. This was then followed by a discussion on the plan's proposals.

Local Council Engagement

4.18 A member of the Planning Policy Team attended the quarterly Local Council Liaison Meeting on 30 October 2018 and gave an update on the Local Plan and its timetable. The consultation process was explained along with the dates of the Revised Publication Local Plan consultation, information about the one-to-one advice sessions and also how the Parish Councils and their communities could respond. This meeting was attended by representatives of the parish, town and village councils within the Borough.

Third Party Promotion

4.19 Whilst not council-led, it is recognised that various third party promotion from the Borough's village, town and parish councils, as well as special interest groups, action groups and local social media community pages took place before and during the consultation period encouraging individuals and local communities to take part and respond to the consultation with their views. This ranged from organised campaigns to impromptu social media activity covering specific matters of interest.

One-to-One Advice Sessions

4.20 Between 13 November and 6 December 2018, advice sessions were held during specific weekday mornings, afternoons and evenings and on Saturdays to provide anyone who wanted to respond to the consultation with focused personal advice of how to do so. A list of the session dates and times are shown in Table 2.

Table 2: One-to-One Advice Sessions

Date	Time
Tuesday 13th November	1pm - 4:30pm
Wednesday 14th November	9:30am - 1pm
Thursday 15th November	5:30pm - 9pm
Saturday 17th November	9:30am - 1pm
Tuesday 20th November	1pm - 4:30pm
Wednesday 21st November	5:30pm - 9pm
Thursday 22nd November	9:30am - 1pm
Saturday 24th November	9:30am - 1pm
Wednesday 28th November	1pm - 4:30pm
Thursday 22nd November	9:30am - 1pm
Thursday 22nd November	5:30pm - 9pm
Saturday 1st December	9:30am - 1pm
Tuesday 4th December	9:30am - 1pm
Wednesday 5th December	1pm - 4:30pm
Thursday 6th December	5:30pm - 9pm

4.21 There were 270 sessions of 20 minutes each available to book. They were held within the reception area of the Basildon Centre which is the Council's main offices. This venue was accessible to everyone and conveniently located within Basildon Town Centre where there are numerous public car parks and good public transport links. Two workstations were reserved for the advice sessions with access to the internet and also near the static information point where the consultation documents were stored. 30 of the sessions were taken up and officers were able to support people in understanding aspects of the plan and how to get across what they wanted to say through their comments.

Consultation Material

- 4.22 Due to the more technical nature of this consultation the Council produced a consultation response booklet to assist those wishing to make a representation. It was structured to draw out which soundness test(s) and/or legal compliance issue their representation related to and it included a guidance note on the front page on what these technical terms meant and how to fill out the booklet.
- 4.23 The questions within the booklet were adapted from the model representation form for local plans set out in Annex 1 of the Procedural Practice in the Examination of Local Plans (2016) document which was published by the Planning Inspectorate. To comply with the General Data Protection Regulations (GDPR) 2018 the booklet also contained the Council's privacy notice and required responders to read and agree with it.
- 4.24 In addition to the response booklet the Council produced a Frequently Asked Questions (FAQs) sheet and a Local Plan summary booklet which provided an overview of what the Local Plan was proposing, information on how to make representations and how to get assistance.
- 4.25 All of the consultation material mentioned above was made available on the Council's website to download and in a printed paper form which could be taken away from the local libraries and the Basildon Centre. Copies of the consultation response booklet is provided in Appendix B and the Local Plan summary booklet is provided in Appendix C.

Availability of Documentation

4.26 Paper copies of the Local Plan, its supporting documents and evidence base, together with the Public Notice and Statement of Representations Procedure, representation booklets, Local Plan summary booklets and FAQs were made available at static information points within the Basildon Centre and Basildon, Laindon, Pitsea, Billericay and Wickford libraries, in accordance with Regulation 35 (1(a)) of the Regulations. Due to space

limitations, and as with previous consultations on the Local Plan, Fryerns and Vange libraries held the main documents together with the Public Notice and Statement of Representations Procedure, response booklets, Local Plan summary booklets and FAQs, but did not hold evidence base documents. Examples of some of the static information points are shown in Appendix D.

- 4.27 In accordance with Regulation 35 (1(b)) of the Regulations all documentation was made freely available on the Council's own website via the dedicated webpage www.basildon.gov.uk/localplan. The Council also created a special micro-site (www.basildonlocalplan.co.uk) which was publicised on the Council's own website to assist users in identifying what the Local Plan was proposing across the Borough. The micro-site used an interactive Google Map™ allowing users to click on any area of the Borough to see what Local Plan draft policies were applicable to that area. During the consultation period more than 10,300 visits to the Council's Local Plan website and the microsite were recorded.
- 4.28 Copies of the Revised Publication Local Plan, the Policies Map and the Policies Map Changes Booklet were also available for purchase upon request.

Making Representations

- 4.29 There were a number of ways that people could make comments and these were documented in the consultation material, the Public Notice and Statement of Representations Procedure, notification letters, and on the Council's website. The Council encouraged the use of the consultation response booklet and the consultation portal, as these provided guidance on the technical nature of the consultation and helped ensure compliance with GDPR. However comments were welcomed in different formats and many responses were submitted in free form letters and emails. Comments could be submitted in the following ways:
 - Online
 - By email
 - On paper
- 4.30 Whilst only written representation could legally be accepted, representatives from the Planning Policy Team were available to answer questions on the consultation at the one-to-one advice sessions, at organised meetings and events, over the telephone and in person at the Basildon Centre. The consultation aimed to be as inclusive as possible.
- 4.31 Where information was missing from representations received by email or in a paper format, or the person had not given consent for the Council to process their personal information, the Planning Policy Team contacted the

individual directly during the consultation period to request it. Information that was requested and received after the close of the consultation was accepted providing the initial representation was received within the consultation period.

5. Duty to Cooperate

- 5.1 Section 110 of the Localism Act 2011 inserted s33A into Part 2 of the Planning and Compulsory Purchase Act 2004 which introduced a duty on local planning authorities, county councils and other bodies with statutory functions to cooperate with each other on strategic planning matters. The Council has continued to work closely with sub-regional and neighbouring local planning authorities and key service and infrastructure providers when preparing the evidence base and developing the Local Plan.
- 5.2 The Council has prepared a separate Duty to Cooperate Statement setting out the extent of engagement and joint working in accordance with the legislation.

6. Summary of Responses

6.1 All comments received during this consultation have been processed and reviewed by the Council. A summary of the main issues raised must be included in a subsequent statement which the Council is required to submit to the Inspector under Regulation 22(1c) of the Regulations. It has also been included within this section of this Statement of Consultation for completeness and a summary of all comments received during the consultation along with the Council's responses are included within Appendix H.

Key Consultation Statistics

- 6.2 A total of 5,070 individual comments were made by 1,588 consultees to this consultation. A schedule of all consultees is reported in Appendix G. Of these, 4,950 comments were deemed to be admissible and form the basis of this statistical analysis.
- 6.3 The majority of representations were made electronically either by emailing planningpolicy@basildon.gov.uk or by submitting them on the Council's consultation portal called Objective. 84% of consultation responses were received from individuals while 16% of them were made by companies or organisations. This includes statutory consultees, non-statutory interest groups, developers and business representatives.

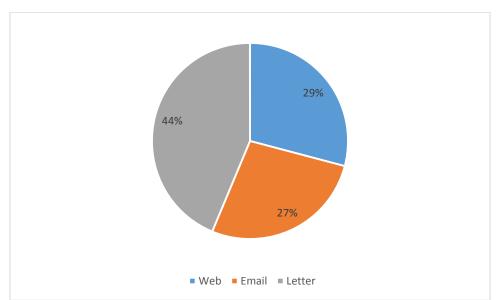
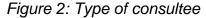
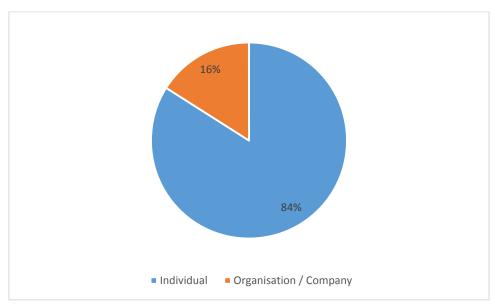


Figure 1: Method of representation





6.4 Post towns were also analysed to identify where residents who commented on the Revised Publication Local Plan lived. The graph below shows that 86% of representations were received from residents from Billericay, 5% from Basildon, 4% from Bowers Gifford, 3% from Wickford and 2% from Little Burstead.

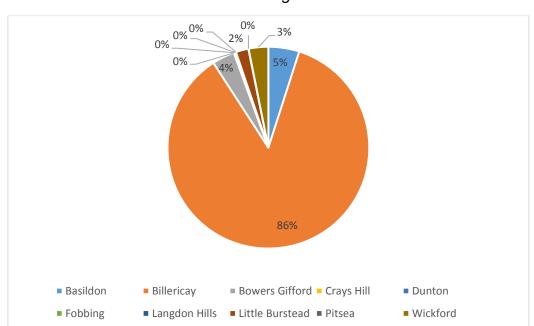


Figure 3: Proportion of responses from residents in different areas in the Borough

- 6.5 It should be noted that there were organised third-party responses from the Billericay area where a resident's association and an action group created their own response form, along with guidance on which policies of the plan to comment on and the type of issues to address for each policy which residents could use if they wished to. Many of the representations received from residents living within Billericay were on these third-party response forms. Ramsden Crays Parish Council, Bowers Gifford and North Benfleet Parish Council and Little Burstead Parish Council submitted formal responses which were supported by a number of residents in their own individual representations. The Council also received a petition style representation signed by 51 residents of the Crooked Brook Estate, Fobbing and nearby properties.
- 6.6 Comments relating to every section of the Local Plan were received during the consultation as well as comments relating to the Policies Map and the Sustainability Appraisal and Habitats Regulation Assessment. However there were two chapters in particular which generated the largest amount of responses, namely Chapter 6: Achieving Sustainable Development and Chapter 11: Delivering a Wide Choice of High Quality Homes. Within Chapter 6 it was policies SD1 and SD2 which the majority of comments related to. Policy SD1 sets out the Borough's housing and employment needs and the level of growth which the plan seeks to meet and SD2 proposes how the level of growth will be distributed across the Borough. Whilst a range of comments were received from statutory consultation bodies, interest groups and developers, a large volume of comments to both SD1 and SD2 were from residents within Billericay who objected to the loss of Green Belt, the

amount and distribution of development being proposed around the town, and who were concerned about the impact of such development on all forms of infrastructure. The majority of comments for Chapter 11 related to housing allocations policies for sites being proposed within Billericay. Whilst they were not all from residents within Billericay, a considerable number were and they reiterated similar concerns made with regards to the policies in Chapter 6.

6.7 Figure 4 shows the breakdown of comments by chapter and the number of comments relating to the Policies Map, Sustainability Appraisal and Habitats Regulation Assessment. Whilst Figure 4 reports a combined total of 50 comments relating to the Sustainability Appraisal and Habitats Regulation Assessment, around a further 250 comments relating to these assessments were incorporated within other representations submitted and are therefore not included within the figure but they have been reviewed.

2500 1999 2000 1776 1500 1000 500 283 275 88 30 44 13 24 19 33 Sugainability Reputation Assessment Glossary and Appendices Chapters 1 to 5 chapter10 Chapters Chapters Chapter 1.1 Chapter 12 . Chapter JA . Chapter 1 Chapter 13

Figure 4: The number of comments relating to each section of the Local Plan and other documents

Inadmissible Comments

6.8 In line with legislation the Council must consider whether all representations have been 'duly made' in that they were submitted in accordance with the consultation procedures. In discharging this duty, the Council must also

- consider whether any representations are 'inadmissible' and therefore invalid as they either contained inappropriate comments, were submitted late, were presented anonymously, were not compliant with GDPR or were illegible.
- 6.9 Representations were received from Natural England shortly after the close of the consultation. As Natural England is a statutory consultation body for the Local Plan process and a statutory consultation body for the Strategic Environmental Assessment, the Council has used its discretion, to accept their representations and include them within the summaries of all comments and the main issues.
- 6.10 There were a total of 120 inadmissible comments, as shown in Figure 5, and three were deemed inadmissible for more than one reason. These inadmissible comments have not been included in the summary of main issues, nor the comment summaries and they have not been considered by the Council. They will also not be made publically available, however they will be passed onto the Planning Inspectorate, with personal information redacted where they did not comply with GDPR, to enable them to view the representations should they wish.

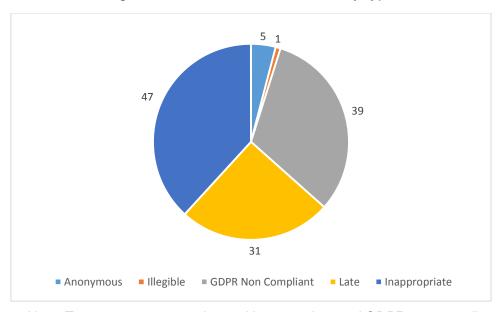


Figure 5: Inadmissible comments by type

Please Note: Two comments were deemed inappropriate and GDPR non-compliant and one comment was late and GDPR non-compliant

6.11 Of the 120 inadmissible comments, 31 comments were submitted outside of the consultation period, one representation was illegible, five representations did not include contact details and therefore could not be registered, and 39 comments were submitted by consultees who did not give the Council consent to use their personal information under GDPR and therefore could not be registered either. 6.12 A further 47 comments were classed as inappropriate. Inappropriate comments were deemed inadmissible where they either incited hatred, were discriminatory or stereotypical in nature or contained inappropriate language. The Council evaluated all representations to determine whether any were inadmissible against the council's Equalities Evaluation Criteria, as shown in Appendix E. The Equalities Evaluation Criteria were prepared in accordance with the Equalities Act 2010 and the Human Rights Act 1998 and the Council's guidance within the consultation response booklets and online stated "Comments which are deemed to be unlawful or discriminatory will be inadmissible and will not be accepted. We would ask that you avoid the use of such comments when making your representations."

Summary of Main Issues

- 6.13 Appendix H reports summaries of all the representations received in document order of the Local Plan for ease and categorises them under the section, paragraph or policy to which they relate. Summaries are then further categorised based on whether they support the plan, object to the plan, are other comments where the point of view is not clarified, or are requesting modifications. The Council also received comments regarding the Policies Map, Sustainability Appraisal and Habitats Regulation Assessment.
- 6.14 Many summaries apply to more than one comment received. Where the comment or modification has been made by a statutory consultation body, an interest group, a developer/agent or a Borough Councillor their name and comment ID has been provided. Comments that do not reference a specific consultee have been made by an individual.
- 6.15 This section of the Statement identifies the main issues arising from the consultation by theme followed by those related to other supporting documents.

Main Issues relating to the Revised Publication Local Plan

- 6.16 Neighbouring authorities are generally supportive of the principle for a Joint Strategic Plan to address matters of housing distribution across South Essex, but there were concerns regarding the shortfall between the Borough's objectively assessed need for housing and the level of housing supply being planned for within this Local Plan.
- 6.17 Concern has also been raised regarding the level of housing growth being planned for within the Local Plan by both residents and developers/landowners. Developers, those promoting land for development and the Hovefields and Honiley Neighbourhood Forum generally consider the level of housing as being too low and argue that the Local Plan should be meeting the Borough's objectively assessed housing need in full. The

- majority of residents, particularly those within Billericay, object to the level of housing being planned for, with many stating that it is too high and should be limited to local needs only.
- 6.18 Many residents also expressed their objection to the distribution of development across the Borough with a particular emphasis on seeking a reduction in the number of homes proposed in their local area. The majority of residents' comments related to development proposals within Billericay, but objections have been received for all housing allocations within the plan. These objections largely relate to the release of Green Belt land to accommodate housing and the impact that development would have on the capacity of community and transport infrastructure. Comments on these matters have generally been made against policies within Chapter 6 and certain key housing allocation policies in Chapter 11 and attribute significantly to the high volume of comments for those chapters.
- 6.19 Many consultees also expressed concern regarding the delivery and funding mechanisms for the infrastructure required to support the level of housing proposed within the plan. Several comments were received on the proposed Billericay Relief Road, which supports development within site allocation H17, particularly where it passes through Frithwood Lane, which is the narrowest section of the relief road and where there has been some encroachment onto highway land.
- 6.20 Bowers Gifford and North Benfleet Parish Council and Hovefields and Honiley Neighbourhood Forum both provided comments on how the plan impacts on the preparation of Neighbourhood Plans for their respective designated Neighbourhood Areas. The Parish Council is concerned that the plan, and in particular policies E6 and H11, adversely impact on the Neighbourhood Area's ability to deliver its allocated housing target and as such objects to these policies and a number of others. This viewpoint was supported by several residents in their submissions. The Neighbourhood Forum and residents within the Neighbourhood Area of Hovefields and Honiley have requested that the Neighbourhood Area be given a housing target, rather than being included as part of one of two broad locations identified within policy SD2.
- 6.21 Many developers whose sites were included within the Local Plan generally conveyed support in principle for the Local Plan, however they did raise concern with those policies that resulted in cost implications for development and requested greater flexibility within those policies and those specifically relevant to their sites.
- 6.22 There was one completely new site that was promoted through the consultation which had not been previously submitted to the Council, since it commenced work on the Local Plan. In addition this this 17 site options

which had not specifically been previously considered, although development within the general location had through previous work, first in relation to the assessment of broad locations for growth through the Core Strategy Revised Preferred Options, and then through work on the development of the Local Plan. The evidence base for the Local Plan has therefore considered these sites to a significant degree, and does not therefore support the inclusion of these sites within the Local Plan. There were a further ten sites promoted during the consultation, which the Council had previously considered through the Local Plan preparation process. These were either 'Omission Sites', or amendments to the extent of site allocations included within the Local Plan, which the Council had previously discounted based on the findings of an extensive evidence base.

- 6.23 The Council received several comments that were concerned with the Local Plan's approach to Gypsy and Traveller provision in the Borough and a number of modifications have been requested as a result.
- 6.24 Several residents, particular from Billericay, voiced their objection to the Local Plan stating that further consultation under Regulation 18 of the Regulations should have been conducted prior to this pre-submission consultation due to the changes that have been made to it since the Council consulted on the Draft Local Plan back in 2016. The Council does not consider this necessary as the Plan has been prepared in accordance with the Regulations and the Council's Statement of Community Involvement. During a Regulation 18 consultation, the Council is required to invite representation on what the Local Plan should contain. It is not expected to be the final version of the Plan that is consulted on at that stage, as the preparation of the Local Plan is an iterative process, informed by consultation, engagement with stakeholders and evidence. Various options have been explored, tested and consulted on throughout this process and the final version of the Local Plan is a culmination of all of this.
- 6.25 Highways England also expressed concern regarding what was perceived to be a lack of engagement between themselves and the Council during the preparation of the Local Plan, and whether the plan has taken into consideration the wider implications of Local Plan growth on the strategic road network. However, the Council believes that it has fully engaged with Highways England (formerly Highways Agency) directly (and indirectly via its Highways Authority, Essex County Council) and invited representation from them during each formal stage of consultation in the preparation of the Local Plan. In addition, to assist Highways England with the Lower Thames Crossing project, the Council has also shared details of all development proposals contained in the Revised Publication Local Plan, and also all urban development that either has planning permission, is under construction, or has been promoted for development to ensure it is considered within their

- modelling work of the implications of the crossing on this new element of the strategic road network.
- 6.26 Natural England is supportive of the approach the Council has taken with regards to the Essex Recreation and Access Management Strategy (RAMS) and broadly supportive of the conclusions of the Habitats Regulation Assessment. It has however suggested a number of minor amendments to policies within the plan to ensure they are effective. Natural England has also raised concern regarding the Council's approach to mitigating the impact of recreational activities within country parks on designated sites within NE2 and the current wording of Policy NE4 with regards to national policy requirements.
- 6.27 Historic England provided several comments recommending minor wording changes to improve clarity and effectiveness of the plan which had not previously been identified in its consultation response to the Draft Local Plan. It has raised particular concern with the level of protection afforded to heritage assets and their settings within a number of allocation policies in Chapters 7 and 11 and requested changes be made to ensure that their conservation is appropriately considered. It has also requested amendments to policies in Chapter 17 to ensure policies are consistent with national planning policy, particularly the distinction between designated and non-designated assets.
- 6.28 The Environment Agency consider the plan to be sound and welcomes the changes that have been made within this plan as a direct result of earlier comments they provided. It has suggested additional wording to the supporting text of Policy CC2 for clarification and changes to the wording of Policy CC1 to further reference flood risk.
- 6.29 Essex County Council is generally supportive of the plan, however it has provided a number of minor changes to supporting text and policies throughout. More specifically it has requested greater flexibility on the protection of educational assets under Policy HC4 and expressed a need for the preparation of a specific delivery strategy for the new grade separated junction on A127.

Main Issues relating to the Policies Map

6.30 There were a limited number of comments relating to the Policies Map and these were mainly from developers and statutory consultees. The majority of comments sought technical amendments to the open space layers, but there were other comments requesting additions to the Policies Map including the reinstatement of the Plotland areas, but for which no policy now relates, sites that have not been allocated within the Local Plan, and the Gypsy and Traveller sites allocated within Policy H3, which would be a breach of GDPR.

Main Issues relating to the Sustainability Appraisal and Habitats Regulation Assessment

6.31 Several comments were received in relation to these assessments that made either technical comments in relation to the findings or questioned the extent of the assessments. These comments have been reviewed by the Council and forwarded to LUC, the independent consultants, who carried out these assessments. They have provided the following statement by letter, a copy of which is shown in Appendix F:

"All representations concerning the Sustainability Appraisal (SA) received during consultation on the Publication Local Plan and the accompanying SA have been reviewed and considered carefully, together with Council officers. In our view, none of the comments and evidence received in the representations have prompted a need to materially change the SA and the reported likely significant effects of the Publication Local Plan remain relevant and unchanged.

During consultation on the Publication Local Plan, the Council received notification of several site options from site promoters in the Borough ('omission sites') that the SA had not previously tested. An SA addendum report was therefore prepared to report the likely significant effects of each omission site for comparison with the other site options appraised throughout the plan-making process, including the final site allocations set out in the Publication Local Plan.

In our view, the legal requirements for SA (and SEA) have been met. The SA incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 which implements the requirements of the SEA Directive (2001/42/EC)."

7. Other Modifications

7.1 In response to the main issues arising from the consultation on the Revised Publication Local Plan, the Council remains of the view that the Local Plan is sound. However, it is agreed that increased clarity and accuracy could be achieved through a series of minor 'other modifications'. The Council has therefore prepared a schedule of proposed 'other modifications' which seek to address some of the issues raised where the Council is in agreement, as well as grammatical and spelling errors that were identified post publication. This schedule is included as Appendix I.

8. Next Steps

8.1 The Local Plan will shortly be submitted, in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Local Development Scheme 2018-2020, to the Secretary of State for Housing, Communities and Local Government, together with all the representations made under Regulation 20, and the supporting documents

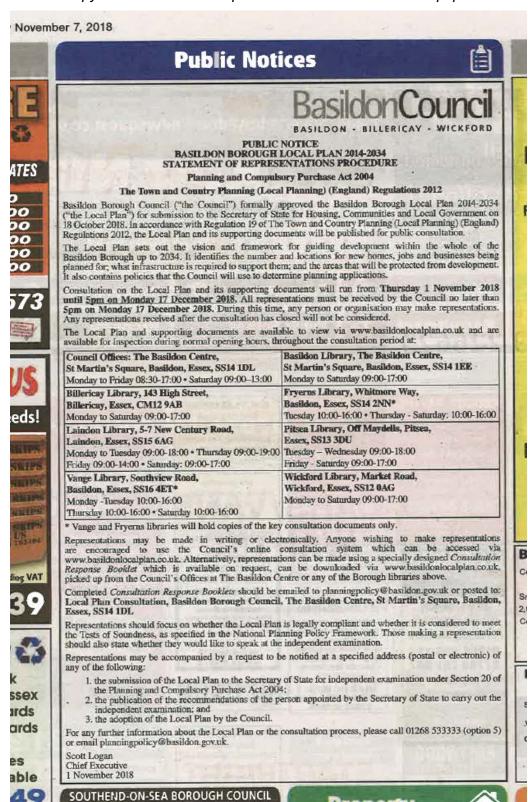
which the Council considers has aided the preparation of the Local Plan. The Council will also be submitting a statement covering all the stages of consultation which the Council has undertaken during the preparation of the Local Plan which will incorporate the information provided within this Statement of Consultation.

8.2 The Secretary of State will pass all the submission documents to the Planning Inspectorate, who will appoint a Planning Inspector to run an Examination in Public, in accordance with Section 20 of the Planning and Compulsory Purchase Act 2004. During the Examination in Public, the Local Plan and its evidence will be scrutinised, including through public hearings to determine whether it can be deemed lawful and sound to be adopted as the Borough's new Development Plan.

Appendix A: Local Press Advertisements

<u>Public Notice and Statement of Representations Procedure</u>

Copy of the Public Notice published within the Echo newspaper

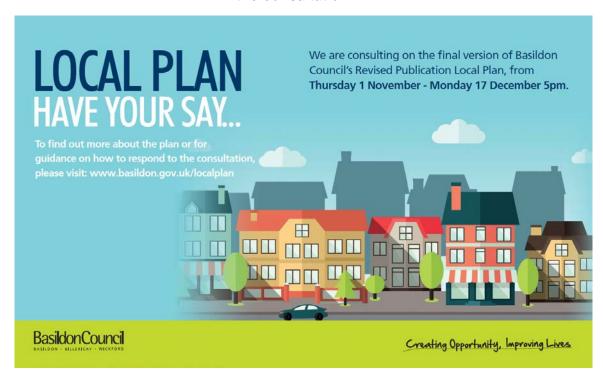


Newspaper Adverts

An example of the half-page newspaper advertisement during the early part of the consultation

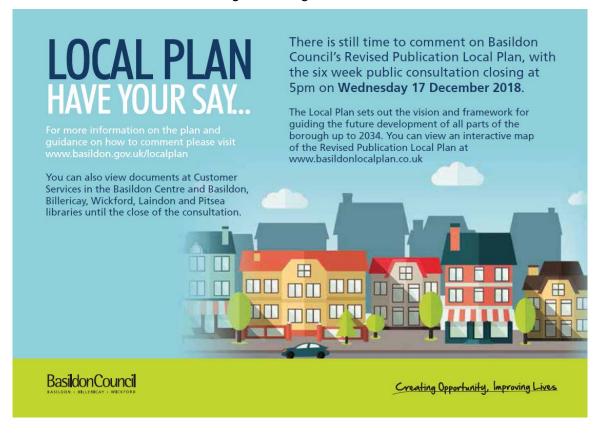


An example of the half-page newspaper advertisement during the latter part of the consultation



'together' Magazine Advert

Advert within the 'together' Magazine Winter 2018 Edition



<u>Examples of Publicity on Twitter, Facebook and LinkedIn during the Consultation</u>

Facebook Advert



Example of a Facebook post



Example of a Twitter Tweet

Example of a LinkedIn Post



E-newsletter Articles

Article from Local news e-newsletter - 19 November 2018

Have your say on the Local Plan



There is still time to comment on Basildon Council's Revised Publication Local Plan, with the six week public consultation closing at 5pm on Wednesday 17 December 2018.

The Local Plan sets out the vision and framework for guiding the future development of all parts of the borough up to 2034.

Advice sessions are available for anyone who is unsure of how to respond to the consultation.

Read More

Article from Bas for Business e-newsletter - 4 December 2018

Still time to have your say - Local Plan



A reminder that the Revised Publication Local Plan public consultation closes on Wednesday 17 December 2018, 5pm.

The Local Plan sets out the vision and framework for guiding the future development of all parts of the borough up to 2034, identifying how many new homes, jobs and businesses are being planned for, where they should be located and what infrastructure is needed to support them. This includes new and improved roads, schools, healthcare facilities, open spaces and leisure facilities. To find out more about the plan and how to comment, please visit www.basildonlocalplan.co.uk

To help bring forward the roads, schools, healthcare facilities and green spaces needed to support the new homes and businesses, the council intends to introduce a Community Infrastructure Levy (CIL). The first stage is to produce a Preliminary Draft Charging Schedule, which the council is consulting on alongside the Revised Publication Local Plan.

Find out more

Appendix B: Consultation Response Booklet

Please return to Basildon Borough Council no later than 5pm on Monday 17 December 2018.



REVISED PUBLICATION LOCAL PLAN REGULATION 19 CONSULTATION RESPONSE BOOKLET

Guidance Note

These notes are intended to assist you in making representations to Basildon Borough Council's Revised Publication Local Plan. At this stage of consultation, the Council is seeking views on whether the Local Plan is legally compliant and meets the tests of 'soundness', as set out in the National Planning Policy Framework (NPPF), and summarised in the boxes below.

Legal Compliance

- The Local Plan should have been prepared in accordance with the Council's latest Local Development Scheme.
- The Local Plan should be accompanied by a Sustainability Appraisal and Habitat Regulations Assessment.
- Consultation on the Local Plan should have been carried out in accordance with the Council's Statement of Community Involvement.
- The Council should have worked collaboratively with neighbouring authorities and prescribed bodies on strategic and cross boundary matters, known as the Duty to Cooperate.
- The Local Plan should comply with all relevant laws including the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012.

Soundness

- Positively prepared provides a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- Justified an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
- Effective deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- Consistent with national policy enabling the delivery of sustainable development in accordance with the policies including the National Planning Policy Framework.

General Advice

- · This booklet has five parts:
 - Part A Contact Details
 - Part B Your Representation
 - > Part C Sustainability Appraisal and Habitat Regulations Assessment
 - Part D Other Monitoring Information
 - Part E Future Notifications and Privacy Notice
- You must provide your contact details within Part A of this booklet. We are unable to accept anonymous representations.
- Please do not include any personal information within Parts B or C of this booklet. All
 comments submitted as part of this consultation will be made publically available in reports and
 online.

- Comments which are deemed to be unlawful or discriminatory will be inadmissible and will
 not be accepted. We would ask that you avoid the use of such comments when making your
 representations. Unlawful comments be passed onto other authorities.
- You will need to fill in a separate Part B for each representation that relates to a different part or
 issue of the Local Plan. This booklet contains five sets of questions in Part B for you to make five
 separate representations. Should you wish to make more than five separate representations
 please use additional booklets.
- You should be as concise as possible when making your comments as they will be passed onto the Planning Inspector.
- Where there are members of a group who share a common view on the Local Plan, a single representation will have just as much weight as multiple representations. In such cases the group should indicate how many people it is representing and how the representation has been authorised.
- Responses must be received by the Council no later than 5pm on Monday 17 December 2018. Late responses will not be accepted.

Part A - Contact Details Please tick as appropriate:

 Responding as an individual (com 	plete section 1)
 Agent responding on behalf of a c 	lient (complete sections 1 and 2)
 Responding on behalf of an organ 	isation (complete section 2)
1. Individual/Client Details	2. Organisation/Agent Details
(Please complete in block capitals)	(Please complete in block capitals)
Title	Title
First Name	First Name
Last Name	Last Name
Address Line 1	Job Title/Dept
Line 2	Organisation
Line 3	Address Line 1
Line 4	Line 2
Postcode	Line 3
Tel. No (Daytime)	Line 4
Email	Postcode
	Tel. No (Daytime)
	Email

			Official Us	e Only
			Reference	:
Part B – Your Representation			Date Rece	ived:
mportant note: You must complete a elates to a different part or issue of t or you to make five separate represe separate representations please use	the Local entations.	Plan. Part B Should you	contains f	ive sets of questior
Representation 1		I a a a l Blan	d Abi-	
1. To which part of the Revised Pu	blication	Local Plan	does this	representationre
Paragraph Number				
Policy Number				
Table Number				
Figure Number				
Appendix				
Policies Map Reference				
Policies Map Changes Booklet Refe	erence			
2. Do you consider the Revised Pu	ublication	Local Plan	to be:	
1. Legally Compliant?		Yes		No 🗆
2. Sound?		Yes		No 🗆
2a. If you consider the Revised Pu select which test(s) of soundn				
☐ Positively prepared [☐ Justifie	ed		
		ed stent with na	tional polic	у
	□ Consis		tional polic	у

(Continue on a separate sh	eet if necessary)		

Page 4

	No, I do not wish to participate at the oral examination
	Yes, I wish to participate at the oral examination
	you wish to participate at the oral part of the examination, please outline why ou consider this to be necessary:
(Cc	ontinue on a separate sheet if necessary)

Page 5

Pages 6 – 17 are repeats of Pages 3 – 5 are repeated a further 4 times between Pages 6 - 17

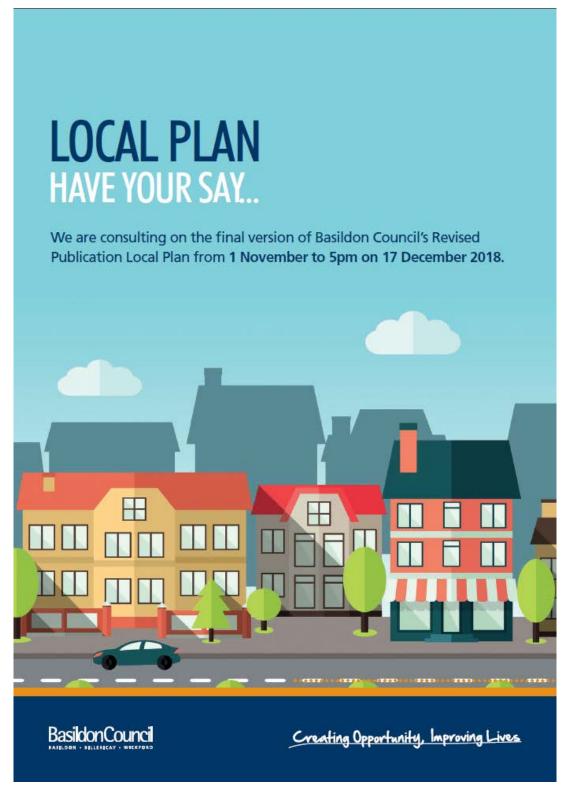
We also welcome your v	riews on the Sustainabili	ty Appraisal and Habitat R e the Revised Publication	egulations Local Plan
Please provide your co		o allo ricerioca i ablication	Local Flam.
(Continue on a separate	sheet if necessary)		

ha Th	e are asking for the follo s been accessible to ev is information is howeve t be published alongside	eryone. We a er an optiona l	re re I pai	quired t of the	to do this by	the Eq	uality Act 2010.
1.	What best describes	_	?				
	Male	☐ Female					
	Transgender	□ Prefer no	t to	say			
Pre	efer to self-describe:						
2.	What age group do y	ou belong to	?				
	Under 16 years	☐ 16-24 ye	ars		25-34 years		35-44 years
	45-54 years	□ 55-64 ye	ars		65-74 years		75+ years
3.	Do you consider you	rself to be a	disa	bled p	erson?		
	Yes	□ No					
4.	What is your sexual o	orientation?					
	Bi-sexual □ He	eterosexual			Gay		Lesbian
	Prefer not to say						
5.	What is your religion	?					
	None 🗆 Cl	nristianity			Judaism		Islam
	Buddhism ☐ Si	khism			Hinduism		Other
	Prefer not to say						
If c	ther, please state:						
	What is your ethnicit	y?					
_	White British			···			
	cypey or marener				lling Showper		
	Any other White backg Asian or Asian British:				or Asian Britis or Asian Britis		
	Any other Asian or Asi background				or Black Britis		
	Black or Black British:	Caribbean		Any of	ther Black or I	Black E	British background
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	Mixed: White and Asia	n		Any of	ther backgrou	nd	
	Prefer not to say						
If c	ther, please state:						

Page 19

Part E – Future Notifications and Privacy Notice					
Future Notifications					
Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box(es):					
	bmission of the Local Plan to the Secretary of State for independent amination under Section 20 of the Planning and Compulsory Purchase Act 200				
	Publication of the recommendations of the Planning Inspector appointed by the Secretary of State to carry out the independent examination				
□ Adop	tion of the Local Plan by the Council				
	Future revisions to the Local Plan, South Essex Joint Strategic Plan, new planning policies and guidance				
How we wi	ll use your information				
We will use your details to contact you regarding your comments on the Local Plan consultation.					
In submitting comments to this consultation we are also required, under The Town and Country Planning (Local Planning) (England) Regulations 2012, to notify you of when the independent examination will take place. We will use the contact details you have provided to do this.					
Please note: At the end of the consultation period, all comments will be made public and will be submitted to the Secretary of State, who will pass them to a Planning Inspector, along with the Local Plan and other relevant supporting documents. Your comments and name will be published, but other personal information will remain confidential.					
Your comments will be reviewed by the independent Planning Inspector appointed by the Secretary of State to carry out the independent examination for the Local Plan. You may be invited to discuss your comments at the oral examination if you have expressed a wish to do so.					
If you chose not to provide your data for this purpose, or ask us to erase your data, you will be unable to participate in the Local Plan process.					
If you would like to find out more about how Basildon Borough Council use your personal data please go to http://www.basildon.gov.uk/privacy-strategic-planning .					
Signature:		Date:			
Please returi December 2	n this form to Basildon Borough Council r 2018:	o later th	nan 5pm on Monday 1 7		
By Email:	planningpolicy@basildon.gov.uk				
By Post:	Post: Local Plan Consultation, Basildon Borough Council, The Basildon Centre, St Martin's Square, Basildon, Essex, SS14 1DL				

Appendix C: Local Plan Summary Booklet



Page 1

WHY IS THE LOCAL PLAN IMPORTANT?

The Local Plan sets out the vision and framework for guiding the future development of all parts of the borough up to 2034. It affects: Billericay. Wickford, Basildon, Laindon and Pitsea, as well as the villages, settlements and Plotlands of Bowers Gifford and North Benfleet, Great Burstead and South Green, Little Burstead, Ramsden Bellhouse, Crays Hill, Shotgate and Dunton.

It identifies how many new homes, jobs and businesses are being planned for, where they should be located and what infrastructure is needed to support them. This includes new and improved roads, schools, healthcare facilities, open spaces and leisure facilities.

It also includes special planning policies that cover various topics such as design, landscaping, housing types, flooding and historic buildings which will also be used to determine all future planning applications.

WHERE ARE WE NOW?

In 2014, the council began preparing a new Local Plan. This built on the previous work it had done on how the borough should develop in the future in a different document called the Core Strategy.

Consultation took place at the beginning of 2016 on the Draft Local Plan where more than 21,500 comments were received. The council listened and in response, agreed 52 key actions to address the concerns raised, and to inform its next version of the Local Plan. The key actions included a further consultation on new and alternative site options. which was held at the end of 2016. In addition, the council agreed to review some of its existing evidence base, carry out further work to assess sites and the infrastructure requirements needed to support new housing and employment.

As a result of this additional work and the comments received, changes were made to the Draft Local Plan and the council produced a Publication Local Plan in March 2018. However, in June 2018 the council withdrew that version and approved a focused review on a number of aspects of the Local Plan. During the summer of 2018 it completed this review and further changes were made. The latest version contains all these updates and is called the Revised Publication Local Plan and has been approved for public consultation

WHY SHOULD I COMMENT?

The Local Plan is an important document which will help shape development within the borough up to 2034. Everyone living, working or visiting the borough will be affected by it in some way

The consultation is open to all and it is the final

consultation before the Revised Publication Local Plan is reviewed by a Planning Inspector

HOW IS THIS CONSULTATION DIFFERENT?

This final stage of consultation is more technical than previous Local Plan consultations, but we encourage you to take part and have your say. After the consultation has finished on 17 December, your comments, along with the Revised Publication Local Plan and all supporting documents, will be submitted to the Government and sent to the Planning Inspector for consideration as part of the Examination in Public.

This consultation is all about whether you think the Revised Publication Local Plan is legally compliant and consistent with national policy, which is known as the

WHAT DOES LEGALLY COMPLIANT MEAN?

For a Local Plan to be legally compliant, it must have been prepared following the correct procedures and processes as required by European Directives and legislation. The relevant core national legislation is the Planning and Compulsory Purchase Act 2004 (as amended), the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012, and the Equality Act 2010 and the Human Rights Act

WHAT ARE THE TESTS OF SOUNDNESS?

This is what the Planning Inspector will assess the Local Plan against during the Examination in Public. The Tests of Soundness are set out in national policy called the National Planning Policy Framework. For a plan to be sound it must be positively prepared, justified, effective and consistent with national policy.

WHAT ARE THE SUPPORTING DOCUMENTS?

To ensure that the Local Plan delivers the right type of development in the right places, whilst also protecting the environment, it has been tested against a range of economic, social and environmental information in the form of a Sustainability Appraisal. It has also been subject to a Habitat Regulations Assessment which assesses whether the Local Plan may have any impact on international and European designated sites that are important to nature conservation such as Ramsar Sites, Special Protection Areas and Special Areas of Conservation. You can comment on these two documents as well, if you wish.

WHAT IS THE LOCAL PLAN PROPOSING?

The Revised Publication Local Plan plans for at least 17 791 new homes consisting of 9 179 new homes within the existing urban areas in Basildon (including Laindon and Pitsea). Billericay and Wickford and around 8 612 new homes on new land allocations taken from the Green Belt. In addition, it plans for a travelling showpeople.

The Revised Publication Local Plan sets an ambitious growth agenda to further boost the borough's economic position in South Essex. It plans to deliver around 20,000 new jobs and up to 92ha of additional employment land.

minimum of 47 pitches/plots for gypsies, travellers and It seeks to maximise the use of previously developed land in the urban areas for housing and employment, also known as brownfield sites, to minimise how much Green Belt land must be lost. At the end of 2034, 59% of the borough will still be protected as Green Belt, compared to 63% in 2018.

Basildon, including Laindon and Pitsea, is the largest town within the borough. As a result, Basildon can deliver the greatest number of new homes and employment land within its existing urban boundaries compared to the other main settlements. In addition to development in the existing urban area, the plan proposes six new expansion sites to the town, which will provide further homes and employment land, as well as a new school, expansions to healthcare facilities, a local centre, public open spaces, enhanced leisure facilities and significant improvements to the road network.

WITHIN THE EXISTING URBAN AREA

- Over 6,500 new homes
- 42.5ha employment land
- within the town centres
- · A further education college
- · New leisure and entertainment facilities
- · A new primary school
- 10 Gypsy and Traveller pitches.

EAST OF BASILDON (PITSEA)

- 650 new homes
- New community hub providing leisure facilities, a new primary school and secondary school
- · New link roads and A127/Pound Lane junction upgrades.

WEST OF BASILDON

- 300 new homes
- A community sports hub
- Public open space.

LONDON ROAD, VANGE

- 650 new homes across two areas to the north and south of London Road
- Improvements to A13/A176 Five Bells Interchange North.

EAST OF NOAK BRIDGE

- 400 new homes
- Extension of nearby primary school.

WEST OF STEEPLE VIEW

- 245 new homes
- · Extension of nearby primary school
- Improvements to the Fortune of War and Dunton junctions on the A127.

EAST OF BURNT MILLS:

- · 48ha of employment land
- Three Travelling Showpeople plots.



Creating Opportunity, Improving Lives



2

Revised Publication Local Plan Statement of Consultation

BILLERICAY

Billericay has a vibrant town centre within a historic core with good transport links. By 2034, it will deliver 0.3ha of new employment space, town centre enhancements and 3.034 new homes, a small proportion of which will be from within the existing urban area. However, the town will need to expand and this will be in the form of five new expansion sites. Alongside new homes, these extensions will deliver a new primary school, improvements to healthcare services, a large extension to Mill Meadows Nature Reserve, other public open spaces, a new relief road between the A176 and A129 and improvements to the existing road network.

SOUTH WEST BILLERICAY

- 1,700 new homes across 4 sites
- · A new primary school
- · Additional healthcare services
- Relocated cricket club and tennis club
- · New network of public open spaces
- · Relief road.

BasildonCounci

NORTH EAST OF POTASH ROAD

- 255 new homes
- · Public open space.

SOUTH OF WINDMILL HEIGHTS

- 200 new homes
- Public open space.

FAST OF GREENS FARMS LANE

- 400 new homes across two new sites one to Sunnymede and the other to South Green
- Publically accessible extension to Mill Meadows Nature Reserve.

EAST OF SOUTHEND ROAD

- 190 new homes
- Public open space.



5

WICKFORD

Wickford is the third main settlement within the borough. It has good transport links and has received recent investment in its town centre to be able to offer a better range of services that meets the needs of its communities. Within the existing urban area, there will be around 1,280 new homes, 0.7ha of additional employment land and new retail floorspace. There will also be four new housing sites to the town that will deliver new homes, a primary school, public open space, expanded healthcare facilities and improvements to the road network.

SOUTH OF WICKFORD

- 1,100 new homes
- Primary school
 Public open space
- A127/Pound Lane junction upgrades.

NORTH OF SOUTHEND ROAD, SHOTGATE

- · 280 new homes
- Public open space
- Upgrades to A127/Pound Lane junction and A127/A130 Fairglen Interchange.

SOUTH OF BARN HALL

- 540 new homes
- · New public open space
- · Relocated recreational ground
- Improvements to A132/Runwell Road junction.

NORTH OF LONDON ROAD

- 300 new homes
- Public open space
- Upgrades to A127/Pound Lane junction and A127/A130 Fairglen Interchange.

NEIGHBOURHOOD AREAS

The plan also sets housing targets for two of the borough's specially designated "Neighbourhood Areas" which will be delivered through their own Neighbourhood Plans.

- Bowers Gifford and North Benfleet Neighbourhood Area has been given a minimum target of 1,350 homes
- Ramsden Bellhouse Neighbourhood Area has been given a minimum target of 39 homes.

OTHER RURAL AREAS.....

The plan will make some minor amendments to the settlement boundary of Crays Hill as well to allow for around 65 new homes. These additional homes will support existing services and give a greater choice in housing.

The borough also has a number of established plotland settlements within the Green Belt. Whilst they do not all provide services in situ, many are near to villages or the edges of towns, which do offer some access to shops, schools and other local amenities. The plan has identified that these plotland areas, along with other suitable small plots around the borough, could deliver 155 new homes.

Creating Opportunity, Improving Lives

SELF BUILD OPPORTUNITIES

Three sites around Billericay will give individuals or families the opportunity to build their own homes on specific sites through self-build. These will deliver a total of 32 new homes.

BROAD LOCATIONS

The council has also identified two broad locations, one to the south of Crays Hill and another to the south of Wickford, which may have potential for future housing growth if existing constraints including sustainable access to local services, highways access and the deliverability of proposals to improve the A127, can be addressed and overcome. This plan does not change their Green Belt designation, but instead identifies them as broad locations, committing the council to consider these locations for future housing growth in the first Local Plan review within 5 years, once further evidence gathering and testing has been undertaken.

Get involved!

The consultation closes at 5pm on Monday 17 December 2018

How can I find out more information?

To find out more information about the Revised Publication Local Plan and what it is proposing please visit 'www.basildonlocalplan.co.uk. The Revised Publication Local Plan and all of its supporting documents can be accessed via this website.

How to respond to the consultation?

You can provide your comments in a few ways, either online through the council's special website way buildonlocablen on the Consultation Response Booklet. Both methods will guide you through what information you need to provide, in order for the Planning Inspector to be able to consider your comments.

The Consultation Response Booklet can be picked up from your local library or the Basildon Centre, or it can be downloaded from www.basildonlocalplan.co.uk.

Alternatively, the council could post a copy of the Consultation Response Booklet to you on request. Please call 01268 588888 (Option 5) to request this.

Once completed it must be emailed to planningpolicy@basildon.gov.uk or sent to:

Local Plan Consultation, Basildon Borough Council, The Basildon Centre, St Martin's Square, Basildon, Essex, SS14 1DL

Whether you choose to submit your comments online, or using the Consultation Response Booklet returned by post/email, responses MUST be received by the council no later than 5pm on Monday 17 Documber 2018. Late responses will not be accepted and you must ensure you leave enough time for postage.

If you do not provide your comments online or use the Consultation Response Booklet, you will need to be clear in your response whether your comments relate to the test of soundness or legal compliance. The Inspector will also need to know whether you would like to speak at the Examination in Public which is anticipated to start sometime in Summer 2019.

BasildonCouncil

Local Plan Advice Sessions

The council will be running Local Plan Advice Sessions at the Basildon Centre on specific dates and times (weekdays, evenings and Saturdays) between Tuesday 13 November and Thursday 6 December 2018.

These are One to One sessions with council officers and are designed to assist people who want to respond to the consultation, but are unsure of how to do so.

Sessions must be booked in advance by visiting www.b-sildonlocalplan.co.uk or contacting the Planning Policy Team. If you have any trouble booking a place, please contact the Planning Policy Team on 10268 533333, option 5.

Static Information Points

During the consultation the Revised Publication Local Plan and other supporting documents will be available to view at unmanned information points at each of the borough's local libraries and within the reception area of the Basildon Centre. Copies of the Consultation Response Booklet will also be available to take away.

What else are we consulting on?

The council has also published for consultation its Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule. This is the first stage in preparing a CIL which the council wants to charge on development in the future to help invest in the costs of new and upgraded roads, schools, healthcare facilities, green spaces etc. that are needed to support the new homes and businesses set out in the Local Plan.

The CIL Preliminary Draft Charging Schedule and information about the consultation is available online at www.basildon.gov.uk/CIL. Reference copies of the CIL Preliminary Draft Charging Schedule are also available in the borough libraries and the Basildon Centre.

To provide your comments online please visit www.basildon.gov.uk/ClL. Alternatively you can fill in one of the council's ClL Preliminary Draft Charging Schedule Consultation Response Booklets which can be picked up from one of the Borough's libraries or the Basildon Centre.

To avoid confusion with the Local Plan Consultation Response Booklets, the CIL Consultation Response Booklets have been printed on blue paper. You can also download a copy by visiting www.basildon.gov.uk/CIL.

Should you wish to respond to the CIL consultation, responses must also be received by the council no later than 5pm on Monday 17 December 2018 in either of the following ways:

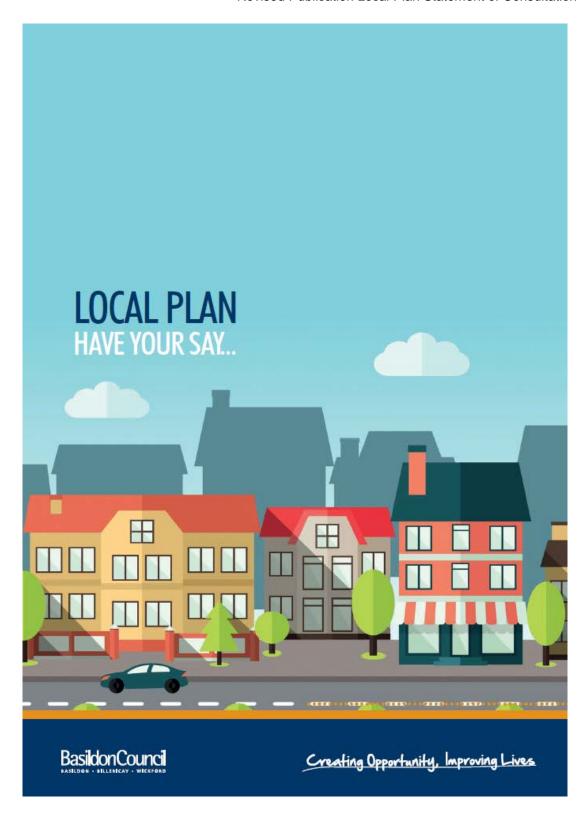
Email: planningpolicy@basildon.gov.uk

Post: CIL Consultation, Basildon Borough Council, The Basildon Centre, St Martin's Square, Basildon, Essex, SS14 1DL



Creating Opportunity, Improving Lives

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Appendix D: Static Information Points

Display within Billericay Library



Display within Laindon Library

Display within Wickford Library



4

Revised Publication Local Plan Statement of Consultation

Appendix E: Equality Evaluation Criteria

	Criteria	Description	Example	Council Response
Criteria 1:	Expressing or Inciting Hatred	Someone with intent to act or incite others based on overt discrimination or hatred.	"I do not want Travellers here, the community should get together and force them out" Use of overtly offensive terms such as paki, nigger, pikey or stereotypes applied to particular groups that incite hatred.	Report issue to the police together with details. This is inciting hatred and could end up with real victims. Details should be given to the police for them to take it up with the individuals.
Criteria 2:	Discriminatory Opinion	An opinion which singles out a particular group of people with no logical explanation. This would include stereotyping	"No land in Laindon should be provided for Travellers" "Lots and lots of students hanging around creating the potential nuisance and the potential to change the atmosphere of the Town for the worse"	These comments should not be taken into account in their original format. Consultees will be provided with the opportunity to amend such comments to make them acceptable. However, if they fail to do so they will not be included within the final report or any decision making process.
				The Council should state in the final report that we do not tolerate any form of discrimination.
Criteria 3:	Genuine Opinion	An opinion that may single out a particular group, but there is a valid explanation and rationale with regards to the issues raised	"I do not think that a campus should be moved into the Town because there are no available playing fields for young people in the area"	Valid response should be included as part of the consultation
			"There is an influx of churches in the area which tend to be in residential places. The churches tend to run into the night which cause noise nuisance. Someone should look into the issue of churches in residential areas and look for ways to address noise nuisance"	

Appendix F: Letter from LUC regarding Comments on the Sustainability Appraisal and Habitats Regulation Assessment



Basildon Borough Council The Basildon Centre St. Martin's Square Basildon Essex

Our reference 10414 Date 22/03/2019

Dear Matthew Winslow

Subject: Publication Local Plan SA Regulation 19 Representations Response

All representations concerning the Sustainability Appraisal (SA) received during consultation on the Publication Local Plan and the accompanying SA have been reviewed and considered carefully, together with Council officers. In our view, none of the comments and evidence received in the representations have prompted a need to materially change the SA and the reported likely significant effects of the Publication Local Plan remain relevant and unchanged.

During consultation on the Publication Local Plan, the Council received notification of several site options from site promoters in the Borough ('omission sites') that the SA had not previously tested. An SA addendum report was therefore prepared to report the likely significant effects of each omission site for comparison with the other site options appraised throughout the plan-making process, including the final site allocations set out in the Publication Local Plan.

In our view, the legal requirements for SA (and SEA) have been met. The SA incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 which implements the requirements of the SEA Directive (2001/42/EC).

Yours sincerely



Mr Jeremy Owen Planning Director LUC

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www.landulae.co.uk Land Use Consultants Ltd Ragistand In lingland Ragistand Office: 43 Chalton Street London WW1 130 100% recycled paper



Appendix G: Schedule of Respondents

Consultee (Name/Organisation)	Consultee (Name/Organisation)
A H P Philpot & Sons Ltd	Acropolis Capital Limited
Amberside Investments c/o Clearbell	AMS Care
Anglian Water Services Ltd	Arcadis
BDW Eastern Counties	Bellway Homes and Crest Nicholson
Billericay Action Group	Billericay District Residents' Association
Billericay Lawn Tennis Club	Billericay Town Council
Biminster Homes	Bloor Homes Eastern
Blue House Estate Limited and Gilbert Commerical Properties Limited	Bowers Gifford and North Benfleet Parish Council
Braintree District Council	Brentwood Borough Council
Brentwood Roman Catholic Diocese Trustee	c2c
Castle Point Borough Council	Chelmsford City Council
CODE Development Planners Ltd	Colchester Borough Council
Commercial Estates Group	Countryside Properties (UK) Ltd
CPREssex	Croudace Strategic
David Wilson Homes Eastern Counties	Dunton Community Association
Environment Agency	Epping Forest District Council
Essex Badger Protection Group	Essex Bridleways Association
Essex County Council	Essex Wildlife Trust
Estate and Agency Strategic Land LLP	Estates and Agency Holdings Limited
FJ Kadesh Builders	Ford Motor Company
Friends of Basildon Golf Course	Gladman Developments Ltd

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Gleeson Developments Ltd	Gleeson Developments/Avant Homes
Greater London Authority	Halsbury Homes Ltd
Highway England	Historic England
Home Builders Federation	Homes England
Hovefields and Honiley Neighbourhood Forum	Infrared
Inland Homes	Jarvis Developments
Kentucky Fried Chicken (Great Britain) Limited	Laindon Common Conservators
Land Group (Billericay) Ltd	Little Burstead Parish Council
Local Partnership Advisor Forestry Commission	London and Cambridge Properties Ltd
Martin Grant Homes (UK) Ltd	Mayflower Archers
Member of Parliament for Rayleigh and Wickford House of Commons	Mill Meadows Society
Millwood Designer Homes Ltd	National Grid
Natural England	New Hall Properties (Eastern) Ltd
NHS England - Essex Area Team	Noak Bridge Parish Council
Norsey Wood Society	Orbit Homes 2020 Ltd
P and A Investments Ltd	Persimmon Homes
Pigeon (Wickford) Ltd	Ramsden Bellhouse Parish Council
Ramsden Crays Parish Council	Redcoombe Ltd
Redrow Homes (Eastern) Ltd	Redrow Homes Ltd
Rochford District Council	Scott Properties and McCarthy & Stone
Smart Planning Limited	Southern and Regional Development Ltd

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Sport England	St Modwen Developments Ltd
Stock Parish Council	Stonebond Properties Ltd
Strutt & Parker	Swan Housing Association
Taylor Wimpey	Tendring District Council
Thames Chase Trust	The Gypsy Council
The Retirement Housing Consortium	Thurrock Borough Council
Transport for London (TfL)	Vange Primary School & Nursery
Village Council Great Burstead & South Green Village Council	Westlands Farm Developments Ltd
Wick 3 Nominees Ltd	Woodland Trust
A Pierce	Aidan Sansom
Alex Barratt	Alex Steven
Alfred Graham	Alison Phillips
Amanda Hutton	Andrew & Susan Broughton
Andrew Tarbard	Anita Green
Ann Hogg	Ann Hollington
Ann Howard	Anna Spalding
Anne Warwicker	Anthony Catmore
Anthony Gilbert	Anthony O'Connell
B D Phillips	B Davis
barbara poutney	Ben Johnson
Benita Adams	Bernard Harper
Beryl Brown	Beryl Mortier
Brenda and Jim Waite	Brian Parry
Brian Watkins	C M Harris

Consultee (Name/Organisation)	Consultee (Name/Organisation)
C.R. Bowers	Caitlin Palmer
Carol Caldon	Carol Read
Carol Savage	Carole Peake
Carole Reeve	Cheryll Dopson
Chris George	Christianne Keating
Christina Kaufman	Christine Ellis
Christine Galley	Christine Halcro
Christine Harris	Christine Pumfrey
Christine Richings	Christine Warren
Christopher Drags	Christopher Kempson
Christopher Spooner	Christopher Tomlins
Claire Blyth-Tancock	Claire Lockwood
Clare Gibbons	Clare McLaughlin
Clifford Slater	Colin Atkins
Colin Bishop	Colin Breathwick
Colin Kidner	Colin Dearlove
Councillor Andrew Schrader	Councillor Chris Jackman
Councillor David Dadds JP	Councillor Stuart Allen
D Crafer	D Farthing
D J Osborne	D R Bethell
Dale Farm Residents Group	Daniel Biggs
Dave Slawson	David Clark
David Lee	David Pearce
David Tyler	David Warman
Dean Lewis	Denise Clarke

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Dennis Goodey	Derek Griffiths
Deric Worthington	Doctor Rita Dasgupta
Donald G Ward	Douglas Rowe
Dr Anurag Goswami	Dr Aswad Manzoor
Dr Joanna Kazik	Dr John Kelk
Dr John L Victory	Dr Jonathan Gould
Dr Keith Nunn	Dr Olga Golberg
Dr Paul Bailey	Dr Paul Richards
Dr Philip Gibbs	Dr Seyed Khorshid
E Widley	Edwin Bow
Elaine Hall	Elizabeth Austin
Elizabeth Condon	Emma Prudence
Eric Hugh Foster	Esther Howchen
Explore Living Ltd	George Jenkins
George Sparks	George Vede
Gillian Legge	Glenn Branch
Glynnis Buck	Grant Dean
Gunnar Steven	Harriet ellis
Heather Bowden	Helen Bullough
Henry & Joan Vaughan	Holly Lewis
Holly Munford	I.T. Legge
Ian Baker	Ian Grant
Ian Howard	J & R Brett
J Anderson	J.D Finn
Jack Copsey	Jacqueline Humphreys

Consultee (Name/Organisation)	Consultee (Name/Organisation)
James Richings	jan Golojuch
Jan Paice	Jane Collins
Jane Wickham	Janet Ellis
Janet Hillman	Janet Lindsell
Janice Shearing	Jean Casey
Jean Harrison	Jean Tuerena
Jean Whitby	Jean Willington
Jennifer Chandler	Jennifer Law
Jill Willis	Joan Pipe
Joanne Proudfoot	John Carvill
John Chinrey	John Hallam
John Pumfrey	John Reed
John Wilson	Joy Baker
Julie Kidner	Julie Williams
K Clark	Karen Beales
Karen Cousins	Karen Dopson
Kate Drage	Kate Pearce
Kathleen heald	Kay Roberts
Kay Sheppard	Keith Howell
Ken Bullough	Kenneth Hazlehurst
Kirsty Palmer	Kirsty Phillips
L A Jenkins	L R H Kettle
Lesley Warren	Leslie Cannings
Leslie Norman	Leslie Smith
Lillian Gilbert	Linda Bates

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Lindsay Miller	Lorna Harper
Lorraine Smillie	Louise Cornall
Lynda Lee	Lynden Sharp
Lynne Beard	Malcolm Gregory
Margaret Dunn	Margaret Ferguson
Margaret Smith	Maria Butler
Maria Chainani	Marian Chinrey
Marion Grant	Mark Chesterton
Mark Chowis	Martin Bryant
Martin Dobbs	Matthew Harvey
Matthew Smillie	Maureen Dell
Maureen Green	Maureen Higdon
Michael Joyce	Michael Kelliher
Michael Tuggey	Michael Warren
Millie Kleider	Miss Aarti Tanna
Miss Adrienne Dunne	Miss Alicia Stratford
Miss Angela Burton	Miss Anita Breathwick
Miss Anne Nash	Miss Christina Woodman
Miss Claire Hookway	Miss Claire Morley
Miss Claire Taylor	Miss Dawn Potter
miss Deborah Harrison	Miss Deborah Johnson
MISS Deborah Young	Miss Dionne Allaker
Miss Elaine Heaps	Miss Emily Horn
Miss Emma Campbell	Miss Emma Dawson
Miss Emma Hookway	Miss Emma Marlborough

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Miss Emma Taylor	Miss Faye Willingale
Miss Fern Copsey	Miss Georgina Adams
Miss Helane Davidson	Miss Helena Atkinson
Miss Isabelle Turner	Miss Jennifer Gidley
Miss Jenny Keen	Miss Joanna Plant
Miss Joanne Brown	Miss Joanne Ling
Miss Julie Stone	Miss Karenza Wheatley
Miss Katharine Sharpe	Miss Katherine Greenwood
Miss Katie Hookway	Miss Kimberley Swanton
Miss Laura Clark	Miss Linda Reid
Miss Lisa Jane Butler	Miss Lisa Macdonald
Miss Lorna Chapman	Miss Michele Oliver
Miss Miranda Seaman	Miss Natasha Jacobs
Miss Nicola Johnson	Miss Pam Jarvis
Miss Sam Lehman	Miss Sara Lee
Miss Sarah Green	Miss Sarah Hawkes
Miss Sarah Maclean	Miss Sue Ireland
Miss Susan Maclean	Miss Thelma Chaney
Miss Tina Denise Fernandez	Miss Tina Diprose
Miss Tracy Calver	Miss Victoria Howe
Miss Wendy Bidwell	Montgomerie & Son
Mr & Mrs Andrew Whitby	Mr & Mrs Antonio & Christina Russo
Mr & Mrs Caroline & Andrew Meades	Mr & Mrs Gary & Nicola Lane
Mr & Mrs Kerngan	Mr & Mrs Maureen & Roy Stephenson

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Mr & Mrs Quirk	Mr & Mrs Trevor Lowman
Mr & Mrs Roy & Elizabeth Selley	Mr A Paice
Mr A Seymour	Mr Adam Adshead Adshead
Mr Adam Scott-Hays	Mr Adam Welsh
Mr Adrian Baker	Mr Adrian Dyer
Mr Alan Dean	Mr Alan Hayman
Mr Alan Henderson	Mr Alan Jones
Mr Alan Lewis	Mr Alan Purkiss
Mr Alan Talboys	Mr Alan Utteridge
Mr Alan Veats	Mr Alan Webb
Mr Alex Dodge	Mr Alexander Woodman
Mr Alistair Cunningham	Mr Allan Norman
Mr Allen Maclean	Mr Allen Prescott
Mr Anastasis Alexandroy	Mr & Mrs Christopher and Ann Orrock
Mr & Mrs Clifford and Dorothy Beckwith	Mr & Mrs R Shaw
Mr Andreas Demetriou	Mr Andrew Black
Mr Andrew Brown	Mr Andrew Fox
Mr Andrew Hornett	Mr Andrew Hutton
Mr Andrew Leslie	Mr Andrew Maxwell
Mr Andrew Peake	Mr Andrew Porter
Mr Andrew Rickard	Mr Andrew Wade
Mr Andrew Wilson	Mr Andrew Wisbey
Mr Andy Clarke	Mr Andy Maddison
Mr Ann & Duncan Alexander	Mr Anthony Beard

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Mr Anthony Carter	Mr Anthony Garner
Mr Anthony Gray	Mr Anthony Hill
Mr Anthony Raymond Phillips	Mr Ashok Aliseril Thamarakshan
Mr Aydin Masters	Mr B Bateman
Mr Barry Durrant	Mr Barry Harlow
Mr Barry Howe	Mr Barry Wheeler
MR Bernard Foster	Mr Bernard Rogers
Mr Bernard Smith	Mr Bernard Thomas
Mr Bradley Miles	Mr Brian Dicks
Mr Brian Ebert	Mr Brian Harkness
Mr Brian Parker	Mr Brian Pringle
Mr Bryan Ferguson	Mr C Hurricks
Mr Carl Roberts	Mr Charles Capon
Mr Charles Lagden	Mr Chris Carter
Mr Chris Clarke	Mr Chris Maloney
Mr Chris Toner	Mr Chris Walsh
Mr Christian Shepherd	Mr Christopher Buck
Mr Christopher Glover	Mr Christopher Longmuir
Mr Christopher Nairne	Mr Christopher Poulten
Mr Christopher Roberts	Mr Christopher Stout
Mr Christopher White	Mr Christopher Wooldridge
Mr Christos Sarantopoulos	Mr Clifford Herbertson
Mr Clive Christy	Mr Clive Hammond
Mr Colin Eastman	Mr Colin Hookway
Mr Colin Jenkins	Mr Colin Morris

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Mr Colin Pratt	Mr Colin Ricketts
Mr Colin Warren	Mr Craig Dorman
Mr D Ryan	Mr Dagaan Withey
Mr Dale Garwood	Mr Dan Semeta
Mr Daniel Burns	Mr Daniel Freeman
Mr Daniel Kent	Mr Daniel Mint
Mr Daniel Trump	Mr Danny Philpot
Mr Danny Temple	Mr Darren Coombes
Mr Darren Snoxell	Mr Darren Williams
Mr Dave Sweet	Mr David Ascott
Mr David Awcock	Mr David Bowles
Mr David Butler	Mr David Chandler
Mr David Collis	Mr David Cooper
Mr David Crawley	Mr David Crest
Mr David Dragoni	Mr David Foran
Mr David Glock	Mr David Hickey
Mr David Hook	Mr David Hughes
Mr David Hussey	Mr David Ireland
Mr David Leader	Mr David Ling
Mr David Mallett	Mr David McPherson-Davis
Mr David OConnell	Mr David Oliver
Mr David Peek	Mr David Pipe
Mr David Pugh	Mr David Randall
Mr David Roberts	Mr David Soul
Mr David Spraggins	Mr David Terrell

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Mr David Threadgold	Mr David Warren
Mr David Went	Mr David Williams
Mr Dean Tandy	Mr Dennis Cox
Mr Dennis Dear	Mr Dennis Hillman
Mr Dennis Lebeau	Mr Dennis Reginald John Livermore
Mr Derek Adams	Mr Derek Briden
Mr Derek Bryant	Mr Derek Corps
Mr Derek Green	Mr Derek Harrison
Mr Derek Mace	Mr Derek Webb
Mr Dermot Keating	Mr Donald Mowl
Mr Douglas Carr	Mr Douglas Hamilton
Mr Douglas Simpkins	Mr Dylan Chase
Mr Eamon Brown	Mr Edmund Readhead
Mr Edward Crowden	Mr Edward John Dixon
Mr Edward Maddox	Mr Edward Spooner
Mr Elliot Watkins	Mr Eric Brown
Mr Ernest Kite	Mr Frank Guest
Mr Fraser Donald	Mr Fraser Mackenzie
Mr Frederick Dick	Mr Frederick Pearce
Mr G Cullen	Mr G Jackson
Mr G. A. Wiggins	Mr Garry Ballard
Mr Garry Wilson	Mr Gary Bennett
Mr Gary Bowles	Mr Gary Brown
Mr Gary Dean	Mr Gary Ferris
Mr Gary Potter	Mr Gavin Taylor

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Mr Geoffrey Clark	Mr Geoffrey Douglas
Mr George Clark	Mr George Green
Mr George Jeffery	Mr George Moore
Mr George Outen	Mr George Wooder
Mr Gerard Nixon	Mr Glenn Bishop
Mr Gordon Daffen	Mr Gordon Shand
Mr Gordon Taylor	Mr Graeme Halleron
Mr Graham Bowman	Mr Graham Cross
Mr Graham Longmire	Mr Graham Moat
Mr Graham Stokes	Mr Graham Walker
Mr Graham White	Mr Grant Pallier
Mr Greg Coltman	Mr Harilal Tanna
Mr Hatton	Mr Haydn Bailey
Mr Henryk Kaskow	Mr Howard Taylor
Mr Hywel Williams	Mr Ian Firth
Mr Ian Linehan	Mr Ian Reynolds
Mr Ian Rolfe	Mr Ian Sawtell
Mr Ian Stubble	Mr Ian Venables
Mr Ian Waldie	Mr Ian Widley
Mr Ian Wiseman	Mr Ian Woodman
Mr Ifor Roberts	Mr Igor Golberg
Mr J M Goodswen	Mr J Webb
Mr J.M Cooper	Mr Jack Greeley
Mr Jake May	Mr James Ablitt
Mr James Boucher	Mr James Carter

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Mr James Clark	Mr James Collins
Mr James Haines	Mr James Henshaw
Mr James Hughes	Mr James Hyslop
Mr James Kiernan	Mr James Killen
Mr James Mankin	Mr James Moran
Mr James Packman	Mr James Richards
Mr James Spurgeon	Mr James Thorogood
Mr James Waite	Mr Jason Smith
Mr Jason Toole	Mr Jeffrey Fairfull
Mr Jeffrey Goodwin	Mr Jeffrey Wilks
Mr Jeremy Marks	Mr Jesse Holloway
Mr John Abel	Mr John Barrett
Mr John Beaumont	Mr John Bigby
Mr John Boulter	Mr John Bromley
Mr John Brown	Mr John Caldon
Mr John Clark	Mr John Edgecombe
Mr john Elliott	Mr John Glover
Mr John Henderson	Mr John Howe
Mr John Humphreys	Mr John L'Estrange
Mr John Little	Mr John Lucas
Mr John Madge	Mr John Matthews
Mr John Meehan	Mr John Mitchell
Mr John Mogg	Mr John Murphy
Mr John Norwood	Mr John Pountney
Mr John Proudfoot	Mr John Rippon

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Mr John Rushton	Mr John Smart
Mr John Tuerena	Mr John Tullett
Mr John Vaufrouard	Mr John Washington
Mr John Waymark	Mr Jon Poole
Mr Jonathan Fisk	Mr Jonathan Hammond
MR Jonathan Harris	Mr Joshua Eldridge
Mr K Kent	Mr Keith Adams
Mr Keith Dewis	Mr Keith Freitag
Mr Keith Mogford	Mr Keith Nicholson
Mr Keith Smith	Mr Keith Thacker
Mr Keith Walmsley	Mr Keith Welch
Mr Kelvin perry	Mr Kelvin Pont
Mr Ken Nutt	Mr Ken Poole
Mr Ken Sharp	Mr Ken Terry
Mr Ken Warnock	Mr Ken Williams
Mr Kenneth Allon	Mr Kenneth Forster
Mr Kenneth Pipe	Mr Kenneth Richmond
Mr Kevin Bates	Mr Kevin Clayton
Mr Kevin Everitt	Mr Kevin Fisher
Mr Kristian Blount	Mr L A Bird
Mr L.T Elphick	Mr Lee Ainsworth
Mrs Christopher Glover	Mr Lee Bannister
Mr Lee Alford	Mr Lee Joyce
Mr Lee Clark	Mr Leo Defoe
Mr Len Willis	Mr Leonard Stringer

Consultee (Name/Organisation)	Consultee (Name/Organisation)
MR Leonard H Cook	Mr Leslie Lucas
Mr Leslie Bannell	Mr Lewis Wilson
Mr Leslie Sharp	Mr Lloyd Carter
Mr Liam Ashby	Mr Luke Quinton
Mr M Cannon	Mr M E Turner
Mr M Thomason	Mr Malcolm Bull
Mr Malcolm Lewis Straiton	Mr Malcolm Lindsell
Mr Malcolm Neil	Mr Malcolm Notley
Mr Malcolm Pearson	Mr Malcolm Woods
Mr Maqsood Jamal	Mr Marc Jones
Mr Mark Bedding	Mr Mark cowper
Mr Mark Dale	Mr Mark Fordham
Mr Mark Fuller	Mr Mark Ireland
Mr Mark Lewis	Mr mark roberts
Mr Mark Smith	Mr Mark Solomons
Mr Mark Williams	Mr Martin Bullock
Mr Martin Burgess	Mr Martin French
Mr Martin Roebuck	Mr Martin Roessler
Mr Martin Whiting	Mr Martyn Heald
Mr Martyn Lee	Mr Matt Lines
Mr Matt Stokoe	Mr Matthew Bausor
Mr Matthew Downer	Mr Matthew Eva
Mr Max Aitkins	Mr Max Harlow
Mr McDowell	Mr MD Stanford
Mr Mervyn Wright	Mr Michael Adams

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Mr Michael Allison	Mr Michael Andrews
Mr Michael Crawley	Mr Michael French
Mr Michael Golding	Mr Michael Hill
Mr Michael Holland	Mr Michael Joe Crawley
Mr Michael Kiel	Mr Michael Merriman
Mr Michael Newell	Mr Michael O'Dell
Mr Michael Redgwell	Mr Michael Yates
Mr Michael Young	Mr Mike Crowder
Mr Mike Paterson	Mr Mike Schneidau
Mr Mohammad Ghani	Mr Mohammed Ahmed
Mr Mohammed Masood	Mr Nanji Patel
Mr Nathan Barnett	Mr Neil Garnett
Mr Neil Mogford	Mr Neil Stafford
Mr Neil Tannock	Mr Neil Watson
Mr Neville Brooks	Mr Nicholas carter
Mr Nicholas Haberis	Mr Nicholas Simkins
Mr Nicholas Thorpe	Mr Nick Jacobsen
Mr Nick Johnson	Mr Nick Read
Mr Nick Sant	Mr Nigel McCormick
Mr Nigel Swanton	Mr Nigel Thompson
Mr Normaan Jamal	Mr Norman Davey
Mr Norman Lamb	Mr Oliver Bull
Mr P J Briscoe	Mr P.J Willson
Mr Patrick McGreal	Mr Paul Aldred
Mr Paul Barnes	MR Paul Brooks

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Mr Paul Coster	Mr Paul Cummins
Mr Paul Farrow	Mr Paul Knight
Mr Paul Lennon	Mr Paul Mckenna
Mr Paul Osman	Mr Paul Robinson
Mr Paul Samuelson	Mr Paul Saunders
Mr Paul Spraggins	Mr Paul Stack
Mr Paul Whelan	Mr Paul Young
Mr Peter Armour	Mr Peter Auger
Mr Peter Bates	Mr Peter Brown
Mr Peter Carney	Mr Peter Claughton
Mr Peter Daniel	Mr Peter Fisher
Mr Peter Garrod	Mr Peter Gladwin
Mr Peter Gore	Mr Peter Harper
Mr Peter Hewitt	Mr Peter Jakes
Mr Peter Jannece	Mr Peter Juson
Mr Peter Kemp	Mr Peter Loerns
Mr Peter Mitchelmore	Mr Peter Noakes
Mr Peter Monger	Mr Peter Randall
Mr Peter Richard Wiley	Mr Peter Sharp
Mr Peter Stokes	Mr Peter Tucker
Mr Peter Walker	Mr Philip Bousfield
Mr Philip Davenport	Mr Philip Jacobs
Mr Philip Richardson	Mr Philip Woods
Mr Phillip Davison	Mr R Capes
Mr Raymond Gibbs	Mr Raymond Halcro

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Mr Raymond Hilkene	Mr Raymond White
Mr Rex Kemp	Mr Reed
Mr Richard Anderson	Mr Richard White
Mr Richard Brown	Mr Richard Armsden
Mr Richard Harris	Mr Richard Burch
Mr Richard Steel	Mr Richard Overill
Mr Richard Walker	Mr Richard Thurgood
Mr Robert Barnes	Mr Ricky Jarman
Mr Robert Chapman	Mr Robert Bunting
Mr Robert Downer	Mr Robert Copsey
Mr Robert Leonard	Mr Robert Goodland
Mr Robert Maclean	Mr Robert Mackey
Mr Robert Meare	Mr Robert Masters
Mr Robert Tanna-Smith	Mr Robert Smillie
Mr Robin Legg	Mr Robert Warren
Mr Roger Davison	Mr Robin Wheeler
Mr Roger Savage	Mr Roger Perry
Mr Roland Lazarus	Mr Roland Brass
Mr Ronald McDonald	Mr Ron Peachey
Mr Ross Edmonds	Mr Ronald Whitt
Mr Ross Louden	Mr Ross Fentiman
Mr Roy Bristow	Mr Roy Barnes
Mr Roy Green	Mr Roy Ellis
Mr Roy Peck	Mr Roy Jennings
Mr S Nolder	Mr Roy Sanderson

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Mr Sebastian Pallier	Mr Sasan Dadgostar
Mr Shane Bourne	Mr Sebastien Pourrat
Mr Shaun Sullnan	Mr Shaun Howchen
Mr Simon Brittain	Mr Simon Aylen
Mr Simon Mackenzie	Mr Simon Elwell
Mr Simon Neill	Mr Simon Mynott
Mr Stanley Tomczynski	Mr Stanley Comber
Mr Stephen Ashdown	Mr Stephen Allcock
Mr Stephen Betts	Mr Stephen Ball
Mr Stephen Bristow	Mr Stephen Boswell
Mr Stephen Clarkson	Mr Stephen Chapman
Mr Stephen Ford	Mr Stephen Elphick
Mr Stephen Hammond	Mr Stephen French
Mr Stephen Lee	Mr Stephen Kemp
Mr Stephen Nicholson	Mr Stephen McCarthy
Mr Stephen Read	Mr Stephen Parsons
Mr Stephen Sibbons	Mr Stephen Roberts
Mr Stephen Taylor	Mr Stephen Steel
Mr Steve Cooper	Mr Steve Atkins
Mr Steven Collins	Mr Steve McCarthy
Mr Steven Frith	Mr Steven Crawley
Mr Steven Tushaw	Mr Steven Shakespeare
Mr Stewart Goshawk	Mr Stewart Ellis
Mr Stuart Byrne	Mr Stewart Parr
Mr Stuart Purkiss	Mr Stuart Dickson

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Mr Swaley Anderson	Mr Stuart Watkins
Mr Terence Brodie	Mr Terence Barnes
Mr Terence Mathews	Mr Terence Dorrington
Mr Terrance Bates	Mr Terence Wood
Mr Terry Dodge	Mr Terry Burrell
Mr Terry Newland	Mr Terry Knight
Mr Tom Monk	Mr Thomas Headley
Mr Tony Papa	Mr Tony Overy
Mr Trevor Baker	Mr Tony Vose
Mr Trevor Jones	Mr Trevor Anderson
Mr Victor Hare	Mr Trevor Bond
Mr Vincent Loss	Mr Trevor Palmer
Mr Virginia Taylor	Mr Victor Oxley
Mr Warr	Mr Vinod Tanna
Mr Wayne Heath	Mr Wayne Cross
Mr William Howard	Mr Wayne Holmes
Mr William Palmer	Mr William Lewsey
Mr William Smart	Mr William Porter
Mr Wyn Edwards	Mr William Wu
Mr. Mark Hayes	Mr. Clive Tooby
Mr. Ricky Dowles	Mrs Mcdowell
Mrs Abhilasha Dubey	Mrs A Bow
Mrs Alexandra Barlow	Mrs Adele Harris
Mrs Alison Kendall	Mrs Alison Heine
Mrs Allison Faux	Mrs Alison Rayner

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Mrs Amy Downer	Mrs Alpna Tanna-Smith
Mrs Angela Bottomley	Mrs Angela Beckett
Mrs Anju Tanna	Mrs Angela Cross
Mrs Ann Barnes	Mrs Ann Atkins
Mrs Ann Dragoni	Mrs Ann Boreham
Mrs Ann Wormand	Mrs Ann Newton
Mrs Annabel Lowman	Mrs Anna Webb
Mrs Annette Clayton	Mrs Anne Woods
Mrs Asia Jamal	Mrs Anu Steel
Mrs B Reed	Mrs Audrey Black
Mrs Barbara Barrington	Mrs Barbara Ann Trumble
Mrs Barbara Miles	Mrs Barbara Benbrook
Mrs Barbara Williams	Mrs Barbara Taylor
Mrs Beryl Wade	Mrs Berenice Bateman
Mrs Beverley Ann Phillips	Mrs Bev Breathwick
Mrs Beverley Seedsman	Mrs Beverley Lovell
Mrs Bridget Washington	Mrs Brenda Allaker
Mrs C Noddings	Mrs C Finn
Mrs Carol Ann Thorogood	Mrs C Willingale
Mrs Carol Mathews	Mrs Carol Cannon
Mrs Carol Osborne	Mrs Carol McCarthy
Mrs Carole Harkness	Mrs Carol Tuskin
Mrs Carole Toner	Mrs Carole Hyslop
Mrs Caroline Dowley	Mrs Caroline Daniels
Mrs Carolyn Chappell	Mrs Caroline Mckenna

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Mrs Cassey Rowe	Mrs Carolyne Roberts
Mrs Catherine Gilmore	Mrs Catherine Bannister
Mrs Christabel Strong	Mrs Celia McDonald
Mrs Christine Barlow	Mrs Christine Clarke
Mrs Christine Edwards	Mrs Christine Haberis
Mrs Christine Pugh	Mr Lorraine Knight
Mrs Chrystal Weatherley	Mrs Claire Cummins
Mrs Clare Armsden	Mrs Colette Wood
Mrs Colleeen Spooner	Mrs Connie Foster
Mrs Coral Neale	Mrs Corrina Lynn
Mrs Deborah Hookway	Mrs Deborah Jackson
Mrs Deborah Scott	Mrs Deborah Stratford
Mrs Deborah Taylor	Mrs Deirdre Joyce
Mrs Denise Clark	Mrs Denise Langley
Mrs Denise Parry	Mrs Denise Pearson
Mrs Diane Mitchell	Mrs Diane Yarnall
Mrs Donna Williams	Mrs Doreen Hull
Mrs Doreen Outen	Mrs Dorothy Vaufrouard
Mrs E Wiggins	Mrs Eleanor Legg
Mrs Elizabeth Daw	Mrs Elizabeth Day
Mrs Elizabeth Kaskow	Mrs Elizabeth Whitworth
Mrs Emily White	Mrs Emma Ball
Mrs Emma Challand	Mrs Emma White
Mrs Emma Williams	Mrs Erika Erika Poole
Mrs Eveline Oliver	Mrs Evelyn Andrews

Consultee (Name/Organisation)	Consultee (Name/Organisation)
Mrs Evelyn sanderson	Mrs Farthing
Mrs Fay Deacon	Mrs Flora Demetriou
Mrs Frances Vanner	Mrs Frances Wilson
Mrs Gaynor Connelly	Mrs Gemma Fewster
Mrs Geraldin Sutherland-Moore	Mrs Gill Gilmour
Mrs Gillian Beaumont	Mrs Gillian Bright
Mrs Gillian Hough	Mrs Gillian White
Mrs Glenda Want	Mrs Gloria Leach
Mrs Goss	Mrs Gwynn Watt
Mrs Hayley Lines	Mrs Heather Becalick
Mrs Heather Douglas	Mrs Helen Alexandroy
Mrs Helen Degrove	Mrs Helen White
Mrs Hilary Minto	Mrs Irene Fayle
Mrs Irene Hoslins	Mrs Iris Shepherd-Ashby
Mrs J Pratt	Mrs J Toomer
Mrs Jackie Dowles	Mrs Jackie Holland
Mrs Jackie Humphreys	Mrs Jacqueline Baker
Mrs Jacqueline Burridge	Mrs Jacqueline Green
Mrs Jacqueline Harris	Mrs Jacqueline Leonard
Mrs Jacqueline Riddell	Mrs Jacqueline Thomas
Mrs Jacqueline Turner	Mrs Jacqueline White
Mrs Jacqui Brown	Mrs Jacqui Mcintyre
Mrs Jacqui Stringer	Mrs Jane Foulger
Mrs Jane Kirillov	Mrs Jane Maddocks
Mrs Janet Barnes	Mrs Janet Bourne

Consultee (Name/Organisation)	Consultee (Name/Organisation)	
Mrs Janet Boyce	Mrs janet hibberd	
Mrs Janet Horn	Mrs Janet Howe	
Mrs Janet L'Estrange	Mrs Janet Walter	
Mrs Janette Dawson	Mrs Janette Joshi	
Mrs Janice Ann Robinson	Mrs Janice Cannings	
Mrs Janice Claydan	Mrs Janis Bull	
Mrs Jayne Ainsworth	Mrs Jayne Hyde	
Mrs Jean Carter	Mrs Jean Hammond	
Mrs Jean Harding	Mrs Jean Harrison	
Mrs Jean Kent	Mrs Jean Threadgold	
Mrs Jen Hills	Mrs Jenni Hamilton-Morris	
Mrs Jennifer Alcock	Mrs Jennifer Byrne	
Mrs Jennifer M Bethell	Mrs Jennifer Mace	
Mrs Jennifer Millar	Mrs Jennifer Mint	
Mrs Jennifer Mitchell	Mrs Jennifer Murphy	
Mrs Jennifer Thorn	Mrs Jill Harlow	
Mrs Jill Mayhew	Mrs Jill Roberts	
Mrs Jill Walsh	Mrs Jo Frost	
Mrs Joan Goodey	Mrs Joan Soul	
Mrs Joan Watkins	Mrs Joanna Monk	
Mrs Joanna Rhule	Mrs Joanne Brittain	
Mrs Joanne Chaproniere	Mrs Joanne Hansford	
Mrs Josephine Nicholson	Mrs Julia Benson	
Mrs Julia Lovett	Mrs Julie Crest	
Mrs Julie Glock	Mrs Julie Venables	

Consultee (Name/Organisation)	Consultee (Name/Organisation)	
Mrs Julie Waldie	Mrs June Smith	
Mrs Justine Mathews	Mrs Kaniz Ahmed	
Mrs Karen Chase	Mrs Karen Colbourn	
Mrs Karen De Cruz	Mrs Karen Ellis	
Mrs Karen Flanders	Mrs Karen Hubbard	
Mrs Karen Jackson	Mrs Karen Jacobs	
Mrs Karolyn Snoxell	Mrs Kate Lotts	
Mrs Kate Reynolds	Mrs Katherine Hussey	
Mrs Kathryn Herlock	Mrs Kathryn Nicholson	
Mrs kay Baker	Mrs Kaye Eldridge	
Mrs Kempson	Mrs Kerrianne Ablitt	
Mrs Kim Barford	Mrs Kim Law	
Mrs Kim Steel	Mrs Kim Wheatley	
Mrs L Copsey	Mrs Laura Pooley	
Mrs Lea Tribe	Mrs Leah Scott-Hays	
Mrs Lesley Mitchelmore	Mrs Lesley O'Connor	
Mrs Liane Eggleton	Mrs Lillian Rickard	
Mrs Linda Banks	Mrs Linda Gray	
Mrs Linda Jewell	Mrs Linda Ling	
Mrs Linda Poole	Mrs Linda Thomas	
Mrs Linda Wright	Mrs Lindsay Wildgust	
Mrs Lisa Greenan	Mrs Lisa Jobson	
Mrs Lisa Young	Mrs Liz Donald	
Mrs Lori Mountford	Mrs Louise Aldred	
Mrs Louise Brown	Mrs Louise Foran	

Consultee (Name/Organisation)	Consultee (Name/Organisation)	
Mrs Louise Loss	Mrs Louise Pearson	
Mrs Lucy Staab	Mrs Lynda Kelly	
Mrs Lynn Ray	Mrs M Robinson	
Mrs Margaret Amner	Mrs Margaret Ann Whiskin	
Mrs Margaret Bromley	Mrs Margaret Burgess	
Mrs Margaret Coppin	Mrs Margaret Cruikshank	
Mrs Margaret Ireland	Mrs Margaret Marks	
Mrs Maria Mence	Mrs Maria Tomczynska	
Mrs Marie Dear	Mrs Marion Howard	
Mrs Marion Warren	Mrs Marjorie Brown	
Mrs Mary Masters	Mrs Mary Pierce	
Mrs Maureen Bowles	Mrs Maureen Nixon	
Mrs Maureen Williams	Mrs Michael Ballard	
Mrs Michele Johnson	Mrs Michelle Gore	
Mrs Michelle Sparks	Mrs Moira Brookes	
Mrs Monica Jones	Mrs Myra Pritchard	
Mrs Natalie Rocks	Mrs Neil Mogford	
Mrs Nicki Watkins	Mrs Nicola Ireland	
Mrs Nicola Morris	Mrs Nicola Ragon-Paxton	
Mrs Nicola Readhead	Mrs Nicola Walker	
Mrs Nina Golberg	Mrs Nina Shand	
Mrs Nina Wu	Mrs P Carney	
Mrs P M Cottrell	Mrs Pam Bishop	
Mrs Pamela Atkinson	Mrs Pat Brown	
Mrs Patricia Abel	Mrs Patricia Bryant	

Consultee (Name/Organisation)	Consultee (Name/Organisation)	
Mrs Patricia Capon	Mrs Patricia Lane	
Mrs Patricia Macnab	Mrs Patricia Notley	
Mrs Patricia Simpkins	Mrs Patricia Williams	
Mrs Paula Clarke	Mrs Paula Hill	
Mrs Pauline Dearlove	Mrs Pauline Leader	
Mrs Pauline Missing	Mrs Philomena Hammond	
Mrs Pratibha Aggarwal	Mrs Pravina Tanna	
Mrs R Dean	Mrs R Dennis	
Mrs Rachael Symmons	Mrs Rachel Kaufman-Mackenzie	
Mrs Rhiannon Ricketts	Mrs Rihana Ghani	
Mrs Rita Plant	Mrs Roberta Cooper	
Mrs Roberta Dodd	Mrs Rosalind Kelk	
Mrs Rose Palmer	Mrs Rosemary Bidwell	
Mrs Rosheen Maureen Dean	Mrs Ruth Coppell	
Mrs S Briscoe	Mrs S Jones	
Mrs Sally Allon	Mrs Sally Costin	
Mrs Sam Hayday	Mrs Sandra Collis	
Mrs Sandra Downer	Mrs Sandra Harding	
Mrs Sandra Stringer	Mrs Sara Lane	
Mrs Sarah Barrett	Mrs Sarah Fentiman	
Mrs Sarah Hodges	Mrs Sarah Humphrey	
Mrs Sarah Kettle	Mrs Sarah Moulsdale	
Mrs Sarah Pallier	Mrs Sarah Potter	
Mrs Sarah Pourrat	Mrs Sarah Rennett	
Mrs Sarah Samuelson	Mrs Sarah Shaw	

Consultee (Name/Organisation)	Consultee (Name/Organisation)	
Mrs Sarah Wilson	Mrs Sarah Woods	
Mrs Sharifa Begum	Mrs Sharon Barnes	
Mrs Sharon Gibbs	Mrs Sharon Richards	
Mrs Sharron Amor	Mrs Sheelagh Pegg	
Mrs Sheila Bristow	Mrs Sheila Pullin	
Mrs Sian Lang	Mrs Sima Heer	
Mrs Sue Cross	Mrs Sue Farmer	
Mrs Sue Wisbey	Mrs Susan Adams	
Mrs Susan Dadgostar	Mrs Susan Longmire	
Mrs Susan Marshall	Mrs Susan Moody	
Mrs Susan Napier	Mrs Susan Norwood	
Mrs Susan Philpot	Mrs Susan Tarbard	
Mrs Susan Tomlinson	Mrs Susan Woodland	
Mrs Susan Wright	Mrs Susanna Parulis	
Mrs Susannah Hervey	Mrs Suzannah Whelan	
Mrs Suzanne Crowe	Mrs T Alexandra	
Mrs Tania Turk	Mrs Tanya Sewell	
Mrs Teresa French	Mrs Terri Sargent	
Mrs Thomas Headley	Mrs Tracey Gregory	
Mrs Tracey Woodman	Mrs Tracy Pringle	
Mrs Trish Widley	Mrs valerie Banks	
Mrs Valerie Elphick	Mrs valerie Randall	
Mrs Valerie Thomas	Mrs Vicky Martin	
Mrs Victoria Cobbold-Moore	Mrs Victoria Cook	
Mrs Victoria Michaelides	Mrs Wendy Hughes	

Consultee (Name/Organisation)	Consultee (Name/Organisation)	
Mrs Wendy Kemp	Mrs Wendy Paterson	
Mrs Wendy Sant	Mrs Wendy Wilson	
Mrs Wilora Killen	Mrs Zareena Khan-Jamal	
Ms Adele Guthrie	Ms Amanda Burton	
Ms Barbara Pentland	Ms Barbara Terrell	
Ms Barbara Worthington	Ms Bev Buckingham	
Ms Beverley Buckingham	Ms Billy Fentiman	
Ms Caroline Bryan	Ms Catherine Glynn	
Ms Christine Gibbs	Ms Christine Wade	
Ms Claire Fitzsimons	Ms Clare Christie	
Ms Deborah Streetly	Ms Emma Fordham	
Ms Helen Watkins	Ms Irene McKeag	
Ms J Ferris	Ms Jake Fentiman	
Ms Janet Carter	Ms Janine Turner	
Ms Janine Yates	Ms Jenny Atkins	
Ms Jenny Hartland	Ms Judith Pountney	
Ms Julie Hayes	Ms Julie Howlett	
Ms Kay Tullett	Ms L Cannon	
Ms Linda La-Thangue	Ms Linda Skaret-Ball	
Ms Lisa Fletcher	Ms Lisa Sully	
Ms Lorraine Smith	Ms Lynn Binstead	
Ms Mandy Tannock	Ms Margaret McLeod	
Ms Mina Patel	Ms Miranda Norman	
Ms Nikki Hammond	Ms Rachel Cross	
Ms Rianne Tomczynska	Ms Sandra Brown	

Consultee (Name/Organisation)	Consultee (Name/Organisation)	
Ms Sarah Mcinerney	Ms Sarah Robinson	
Ms Sharon Sansom	Ms Susanne Dale	
Ms Sylvia Willmer	Ms Sylvina Tate	
Ms Tania Hughes	Ms Tracey Kernaghan	
Ms V Taylor	Ms Zerin Djemal	
N Stark	Nicholas Bowles	
Nina Yates	Norman McGuire	
Oliver Bowles	P J Tear	
P Miles	P.E Stringer	
Pamela Norman	Patricia Cook-Jones	
Patricia Jenkinson	Patricia Sheen	
Patrick Cannon	Paul Monk	
Paul Donley	Paul Read	
Paul Martin	Paula Wakeling	
Paul Phillips	Penny ullmar	
Paul Sutherland-Moore	Perry Prudence	
Pauline Skeet	Peter Copsey	
Perdita Robinson	Peter Farrant	
Peter Baker	Peter Strong	
Peter Dowell	R J Goodswen	
Peter Hall	Ray Gapes	
Peter Williamson	Richard Carter	
R Widley	Richard Fleetwood	
Richard Elkington	Richard Smith	
Richard Glanville	Robert Skeet	

Consultee (Name/Organisation)	Consultee (Name/Organisation)	
Rita Kittle	Rodney George Thorn	
Rod Mansfield	Ronald Rowe	
Ronald & Barbara Oliver	Ryan Sansom	
Roy Frank Reeve	S Jordan	
S D E Klerk	Samantha Fisk	
Sally Webb	Sandra McCarthy	
Samantha Russell	Sophie Hammond	
Smith and Mence	Stephen Clark	
Stephen Burroughs	Sue Nicholls	
Stewart Hannah	Susan Broughton	
Sue Seddon	Susan Monk	
Susan Griffiths	Susanne Steven	
Susan Torr	Teresa Eileen Catmore	
Ad Jobson	Terry Shearing	
Terry Potter	Tony Beales	
Theresa Cannon	Tony Munford	
Tony Lovett	Tracie Ferris	
Tracey Gladwin	Trisch Knight	
Tracy Whitt	Valerie Mansfield	
Usman Masood	Veronica Atkins	
Vanessa Carter	Wendy James	
Vincent Carter	Wendy Williamson	
Wendy Toomer-Harow	Ying Cui Mittl	
William Carnochan	Zara Masood	
Yvonne Pasola		

Appendix H: Schedule of Comment Summaries

Section/Para/ Policy	Summary of Responses	Council's response
Whole Local Plan		
Whole Plan	 Support: Supports overall approach to housing and employment allocations. (Chelmsford City Council RPLP/1645). The Council does not object to the Local Plan on grounds of legal compliance or soundness. (Rochford District Council RPLP/1646). The Council does not question the legal compliance of the plan. (Castle Point Borough Council RPLP/1853). Support the Plan period identified. (Persimmon Homes RPLP/2043). Supports Local Plan. (Ramsden Bellhouse Parish Council RPLP/5015). Objection: More infrastructure needed. (Norsey Wood Society RPLP/2001). Concern about the loss of Green Belt in Billericay. (Norsey Wood Society RPLP/2001). Lack of policy relating to environmental and biodiversity issues. (Norsey Wood Society RPLP/2001). Full OAN not being met. (Persimmon Homes RPLP/2043). 	The comments recorded against the whole plan generally raise objections in relation to the scale and location of development, and its ability to be serviced by sufficient infrastructure. Concerns are also raised with regard to environmental impacts. The Basildon Borough Local Plan has been prepared having regard to the full suite of evidence available, covering the needs for development, the potential environmental constraints on development and the needs for infrastructure. This evidence was used as part of a transparent decision making process through the Council's committee system, and planning judgements were made by the Local Planning Authority having regard to that evidence. The Council is therefore satisfied that the plan is generally sound, although

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Section/Para/ Policy	Summary of Responses	Council's response
	 The CIL Viability Update Study is out of date which could restrict rather than enable the delivery of development. (Taylor Wimpey RPLP/2060). There is a lack of criteria or insufficient detail within the site specific policies for the conservation and enhancement of the historic environment. (Historic England RPLP/2118). The historic environment policies do not confirm with the NPPF. (Historic England RPLP/2118). Concern about the impact on wildlife conservation and biodiversity. Insufficient land has been allocated to enable delivery. Council cannot demonstrate a 5 year land supply. Proposed housing target has not been correctly calculated. Local area and infrastructure will be put under unnecessary strain by the Local Plan. Local Plan does not benefit residents. Lack of transport assessments. The Draft Local Plan was consulted on and ready for submission but the changes to it by the Tory administration has resulted in the current Local Plan being unsound. Local Plan is not sound or sustainable. Other comment/s: Critical that allocations are supported by appropriate infrastructure. (Chelmsford City Council RPLP/1645). 	recognises that the full OAN for housing has not been met. It is noted that Taylor Wimpey question the robustness of the Viability Assessment especially in relation to H17. However, this has been kept under review, most recently updated in September time 2018. Billericay is an area of the Borough where development is significantly viable, and this has remained the case through various iterations of the plan. No amendment is therefore necessary to the plan in relation to this representation. It should however be noted that updated viability evidence will be prepared to deal with the outcomes of the CIL PDCS consultation.

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Section/Para/ Policy	Summary of Responses	Council's response
	 Seeks further opportunity to comment on the emerging Strategic South Essex Plan and evidence. (Chelmsford City Council RPLP/1645). Council considers the plan to be sound and legally compliant providing un-met development need is dealt with. (Chelmsford City Council RPLP/1645). Green Belt review must be consistent with national policy. (Wick 3 Nominees RPLP/1951, RPLP/1976). Stepped trajectory is not consistent with national policy. (Wick 3 Nominees RPLP/1951, RPLP/1976). More robust evidence needs to be provided regarding infrastructure delivery, its timing and funding. (Wick 3 Nominees RPLP/1951, RPLP/1976). Transport assessments need to stress test housing delivery to facilitate earlier delivery. (Wick 3 Nominees RPLP/1951, RPLP/1976). Early delivery of housing needs to be better supported by the phasing of infrastructure. (Wick 3 Nominees RPLP/1951, RPLP/1976). Viability assessment needs to be more robust and take account of the fully policy burden. (Wick 3 Nominees RPLP/1951, RPLP/1976). Housing mix policy is insufficiently flexible. (Wick 3 Nominees RPLP/1951, RPLP/1976). Modification/s requested: 	

Section/Para/ Policy	Summary of Responses	Council's response
	 The CIL Viability Update Study is out of date in relation to H17 which could restrict rather than enable the delivery of development. (Taylor Wimpey RPLP/2060). Additional land for housing delivery should be allocated to meet the unmet housing need and to be deliverable. 	
Consultation	 Objection: Lack of consultation. (Norsey Wood Society RPLP/2001). Consultation process is not inclusive or objective due to reduced access to paper copies, lack of plain English summaries, lack of officer or Councillor availability to meet residents, notification was only to those who had responded to previous consultations, and the forms constrained comments. Significant changes to the development proposals in Billericay but no further consultation. No requirement for persons with land interest to declare it in their consultation response. Questions the legitimacy for developers to be involved throughout the plan making process while residents can only comment during consultation periods. Modification/s required: Fundamental changes are needed to the Plan to make it sound. 	The Inspector will receive a Regulation 22 Statement which details the consultation undertaken at Regulations 18 and 19 in the plan-making process. This demonstrates that substantive efforts have been taken to engage stakeholders in the Local Plan process. The scale of engagement that has been achieved is evident in the number of consultation responses received throughout.
Duty to Cooperate	Support:	In March 2018, a Duty to Cooperate Statement was provided to the Council

Section/Para/ Policy	Summary of Responses	Council's response
	 Considers that the Duty to Cooperate requirement has been met through the production of the plan. (Castle Point Borough Council RPLP/1853). Objection: The full housing need across the housing market area should be addressed through the plan making stage. (Gladman Developments Ltd RPLP/2011). It is unclear if Basildon Council has effectively discharged the Duty to Cooperate through the preparation of the Plan. (Gladman Developments Ltd RPLP/2011, Persimmon Homes RPLP/2043, David Wilson Homes Eastern Counties RPLP/2195). No details given as to how unmet housing need across the housing market area will be met. (Gladman Developments Ltd RPLP/2011, Persimmon Homes RPLP/2043, David Wilson Homes Eastern Counties RPLP/2195). Other comment/s: Provide evidence on the duty to cooperate. (Taylor Wimpey RPLP/1920, Wick 3 Nominees RPLP/1951, RPLP/1976). Modification/s required: A 'Duty to Cooperate Statement' is required. (Taylor Wimpey RPLP/1920, Wick 3 Nominees RPLP/1951, RPLP/1976, Gladman Developments Ltd RPLP/2011, Persimmon Homes 	as part of its decision making process on the Local Plan. This was updated in October 2018, when the Council reconsidered the publication and submission of the Local Plan. A further revised version will submitted alongside the Local Plan, reflecting progress since October. In terms of meeting housing need, the Council agreed a SoCG and revised LDS in 2018 committing to the preparation of a JSP for South Essex. This is fully referenced in respect of policy SD1, and policy SD1 is very clear that the Basildon Local Plan contributes into the South Essex wide need, and that a plan review will be triggered if opportunities are identified through the JSP for additional homes to be provided within Basildon Borough. This clearly demonstrates how the Duty to Cooperate is operating in South Essex to address housing needs in a coordinated and strategic way.

Section/Para/ Policy	Summary of Responses	Council's response
	RPLP/2043, David Wilson Homes Eastern Counties RPLP/2195).	
NPPF 2012 / NPPF 2018	Other comment/s: • Assumption that the Local Plan will be submitted prior to 24 January 2019 and therefore have been assessed against the 2012 NPPF. (Taylor Wimpey RPLP/1888).	The LDS indicates Q1 2019.
Evidence Base	 Supports the findings of the Landscape study and Green belt Review and the Green Belt Topic Paper. (BDW Eastern Counties RPLP/2191). Objection: There is a lack of detailed and proportionate historic environment evidence base for some parts of the Plan. (Historic England RPLP/2118). Other comment/s: Acknowledges that the Local Plan is supported by evidence from the IDP. (BDW Eastern Counties RPLP/2191). 	There is a substantial evidence base to support the local plan, including evidence in relation to historic assets. Information on designated historic assets is included in the SA, and site level archaeology assessments were undertaken for potential site allocations, and also incorporated into the SA. It is not therefore correct to suggest that there is lack of historic evidence to inform the plan. It should be noted that the representation from Historic England to the Draft Local Plan did not raise this issue, and the additional archaeology assessment has been completed since that time.

Foreword

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Section/Para/ Policy	Summary of Responses	Council's response
Foreword	 Objection: Land designated as Green Belt should only be developed as a last resort. No development should take place prior to the provision of infrastructure. Object to housing development in Billericay due to insufficient infrastructure and Green Belt restrictions. Modification/s requested: Any proposal to develop on Green belt land must go to public consultation before and developer receives indication that their proposal can be considered. Any developer seeking planning permission must provide whatever contribution towards the infrastructure deemed necessary for their planned development before approval can be given for commencement of any works. Re-work the Objectively Assessed Need for housing in the borough. Do not build on the Green Belt land. 	The Council has calculated its housing need having regard to national planning policy and the level of housing need identified within the Local Plan is therefore sound. The national Planning Practice Guidance is clear that the calculation of need should not take into account constraints. In terms of the Local Plans proposals for development in the Green Belt, the need for this to occur has been determined having regard to the 'Calverton Tests' and the tests set out in the NPPF. The Council is therefore satisfied that the exceptional circumstances exist to amend the Green Belt boundaries for development needs. Extensive consultation on this matter occurred in relation to the Revised Preferred Options Core Strategy, the Draft Local Plan and
		the New and Alternative Sites consultation. In relation to the alignment of growth and infrastructure provision, the plan is clear throughout that this is a requirement.

Section/Para/ Policy	Summary of Responses	Council's response
		However, the timing of infrastructure provision must be reasonable based on the development proposed, and the infrastructure needed. It would be unreasonable for all infrastructure to be provided upfront, as some services cannot operate until a critical mass is achieved e.g. schools.
Chapters 1 – 5		
Chapters 1 to 5	Objection: Concerned that there is insufficient funding for infrastructure. Object to the distribution of development within the borough.	The Council is satisfied that the Local Plan will put it in a position to secure infrastructure funding through developer contributions, and by setting out a plan for growth which will attract funding from public sources. The distribution of development has been assessed through the Sustainability Appraisal since the Core Strategy Revised Preferred Options, and is considered to be appropriate as it concentrates development in main settlements where infrastructure and service provision is good.

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Section/Para/ Policy	Summary of Responses	Council's response
Chapter 1: Introd	uction	
Paragraph 1.4 Chapter 1: Introduction	Objection: • Additional housing allocations are required to meet the OAN. (Land Group (Billericay) Ltd RPLP/1439). Modification/s requested: • Include a new policy for the allocation of land at south of Cray's Hill, including Dale Farm, for up to 1,500 homes. (Land Group (Billericay) Ltd RPLP/1439).	The Council is satisfied that it has been through a robust and transparent process to identify sites to meet its housing need. However, having regard to sustainability, Green Belt and infrastructure constraints it is considered that the supply is constrained. The site promoted in this representation has been tested for accommodating housing development as part of the above process, but was discounted. The final selection of housing sites allocated within the Revised Publication Local Plan have been informed by an extensive evidence base, pulled together in the Housing Options Topic Paper. The Housing Options Topic Paper gives an explanation on how the Council has considered all the housing site options, using the extensive evidence base available to inform their decisions. This site was omitted because it does not follow the Council's spatial strategy, and

Section/Para/ Policy	Summary of Responses	Council's response
		does not offer a sustainable alternative. This conclusion is supported by the Sustainability Appraisal.
Paragraph 1.9 Chapter 1: Introduction	 Objects to updates within the evidence base that has informed the Local Plan. (Billericay Action Group RPLP/2041). Other comment/s: Basildon Council has fulfilled its obligations regarding Duty to Cooperate with regard to the statutory responsibilities of Essex County Council. (Essex County Council RPLP/1679). The Council should prepare a Statement of Common Ground to support the ongoing engagement on strategic cross boundary matters. (Essex County Council RPLP/1679, GL Hearn RPLP/2102, Wick 3 Nominees Ltd RPLP/1916, Brentwood Roman Catholic Diocese Trustee RPLP/1886). Modification/s requested: The Council should prepare a Statement of Common Ground to support the ongoing engagement on strategic cross boundary matters. (Essex County Council RPLP/1679, GL Hearn RPLP/2102, Wick 3 Nominees Ltd RPLP/1916, Brentwood Roman Catholic Diocese Trustee RPLP/1916, Brentwood Roman Catholic Diocese Trustee RPLP/1886). 	In relation to the comment on the evidence base, the Council is satisfied that the Local Plan is based on robust evidence. Some evidence was updated following consultation on the Draft Local Plan, indicating the Council took heed of comments made at that time to address any concerns. In relation to the Duty to Cooperate, the Council agrees it has worked closely with ECC in the preparation of the Local Plan, and a SoCG to this effect will be prepared evidencing this joint close working.
Paragraph 1.10	Objection:	The Council notes some complaints about the consultation process. However, the Statements of Consultation

Section/Para/ Policy	Summary of Responses	Council's response
Chapter 1: Introduction	 The Council's consultation portal did not include access to previous Local Plan consultations as at the time of the Regulation 19 consultation. Lack of public consultation and engagement. Objects to the Regulation 19 procedure for submitting representations on the Local Plan. Requests further details on infrastructure required to support growth. Lack of consultation with neighbouring authorities. Modification/s requested: The regulation 19 pre-submission Local Plan consultation should have been stopped until these requested documents were made available to the public, after which it could be rerun. Amend the plan to incorporate local opinion. Organise local open discussions with residents of each area to gauge their specific views and considerations. Provide precise detail of all infrastructural and service improvements that will be delivered before or along with all confirmed developments. Further consultation is required. Revise the plan to ensure development across the borough is based on sustainability analysis. 	for all past events were available on the Council's website throughout the consultation. Furthermore, consultees could access their own comments by logging into the Objective system. In relation to the consultation itself, the process that has been undertaken at both regulation 18 and 19 was extensive and elicited high levels of engagement and comment. The Council is satisfied that it has therefore met the consultation requirements of legislation and the SCI. Comments were also made with regard to the consultation response form. This form was based on PINs guidance, and included clear guidance on the front cover to assist consultees. In terms of other comments against this section, the IDP contains details of infrastructure requirements and was available throughout the consultation. It is also suggested that the plan should have been subject to 'sustainability

Section/Para/ Policy	Summary of Responses	Council's response
		analysis'. The Local Plan has been informed by a Sustainability Appraisal, which was available throughout the consultation.
Paragraph 1.11 Chapter 1: Introduction	 Supports the Council's approach to fulfilling the Duty to Cooperate. (Chelmsford City Council RPLP/1639). Supports the Council's commitment to working across the region to prepare a Joint Strategic Plan (JSP). (Chelmsford City Council RPLP/1639). Objection: Requests further information regarding Duty to Cooperate and how the requirements have been met. (London and Cambridge Properties Ltd RPLP/1885). Modification/s requested: The Council should prepare a Statement of Common Ground to support the ongoing engagement on strategic cross boundary matters. (London and Cambridge Properties Ltd RPLP/1885). 	A Duty to Cooperate Statement accompanied the Local Plan when it was approved for publication and submission in October 2018. This updated an earlier version reported to Council in March 2018. A further updated version will accompany the submission. A Statement of Common Ground is in place with South Essex Authorities already. This was approved in June 2018. A separate Statement of Common Ground has been prepared for Chelmsford, as a neighbour siting outside south Essex.
Paragraphs 1.14 – 1.15 Chapter 1: Introduction	 Support: Supports the Council's decision to preserve the strategic corridor of Green Belt land to the west of Basildon. (Dunton Community Association RPLP/1977). 	

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Section/Para/ Policy	Summary of Responses	Council's response
	 Supports the requirement that growth must be supported by improvements to infrastructure. (Essex County Council RPLP/1680). Supports the relevant references to the ECC Developer's Guide to Infrastructure Contributions 2016. (Essex County Council RPLP/1680). 	
Chapter 1: Introduction	 Objection: Basildon Borough would be losing 6% of its Green Belt and not 4% as stated in the plan. Modification/s requested: Correct the two sentences in the introduction and paragraph 14.29 to say that 6% of the green belt will be lost rather than 4% as it says now. 	The Council notes that this paragraph confuses the loss on area covered (62% down to 58% - 4%) with the overall loss of Green Belt – 6% of total area. An amendment is agreed to improve the clarity of this paragraph.
Chapter 2: Policy	Context	
Paragraph 2.1 Chapter 2: Policy Context	 Objection: Lack of public consultation and engagement. (CPREssex RPLP/1874). Modification/s requested: CPRE suggests that to make the Plan legally compliant, there should have been a full Regulation 18 consultation on the version of the Plan that was finally approved for this Regulation 19 consultation. (CPREssex RPLP/1874). 	The Council is satisfied that it has met its legal duties as set out under regulation 18. Regulation 18 does not require consultation on all policy options prior to Regulation 19, and inevitably if Regulation 18 is effective there will be policy changes between Regulation 18 and Regulation 19.

Section/Para/ Policy	Summary of Responses	Council's response
Paragraph 2.7 Chapter 2: Policy Context	 Objection: The Local Plan should be in accordance with the July 2018 NPPF. (Billericay District Residents Association RPLP/1625, Martin Grant Homes (UK) Ltd RPLP/1751). Concerned that there won't be sufficient time to consider consultation responses before the submission of the plan. (Billericay District Residents Association RPLP/1625). Modification/s requested: Amend the plan so that it accords with the advice contained within the July 2018 National Planning Policy Framework. (Billericay District Residents Association RPLP/1625, Martin Grant Homes (UK) Ltd RPLP/1751). 	The Council took the opportunity to review the requirements of the plan against the Revised NPPF prior to reporting to Committee and Council in October. The Council is satisfied that the plan is generally in conformity with the Revised NPPF.
Paragraphs 2.12 – 2.15 Chapter 2: Policy Context	 Support: Welcomes the reference to County Strategy within the plan. (Essex County Council RPLP/1681). Other comment/s: Requests that reference should also be made to the A127 Task Force within the County Strategy. (Essex County Council RPLP/1681). Modification/s requested: Change paragraph 2.14 to acknowledge the formation of the A127 Task Force. (Essex County Council RPLP/1681). 	ECC seek for reference to be included to the recently formed A127 Task Force. Given the strategic importance of the A127 this amendment is supported.

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Section/Para/ Policy	Summary of Responses	Council's response
Paragraphs 2.17 – 2.21 Chapter 2: Policy Context	 Other comment/s: Requests wording changes to paragraphs 2.17 and 2.18 with regard to the respective Minerals and Waste Local Plans. (Essex County Council RPLP/1683). Modification/s requested: Requests wording changes to paragraphs 2.17 and 2.18 with regard to the respective Minerals and Waste Local Plans. (Essex County Council RPLP/1683). 	ECC, who are the waste and minerals planning authority sought amendments to the references regarding the Waste and Minerals Local Plans. The Council agrees these amendments would ensure that the policy context is up-to-date and accurate.
Paragraphs 2.22 – 2.24 Chapter 2: Policy Context	 Support: Welcomes reference to the South Essex policy context. (Essex County Council RPLP/1684). Objection: Requests further information regarding the Association of South Essex Local Authorities (ASELA). Other comment/s: Paragraph 2.24 should include reference to the South Essex Statement of Common Ground. (Thurrock Borough Council RPLP/855). Modification/s requested: Include reference in paragraph 2.24 to the South Essex Statement of Common Ground. (Thurrock Borough Council RPLP/855). 	The Council is committed to the preparation of the JSP, and agreed the SoCG in June 2018. It is agreed that this should be referenced in the text as suggested by Thurrock Council. The JSP will be subject to its own consultation processes in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Plan) Regulations. It is not therefore necessary to repeat consultation on the Basildon Plan once the JSP is developed. Policy SD1 is clear that the Basildon Local Plan will be reviewed once the JSP is completed and there will consultations as part of that review.

Section/Para/ Policy	Summary of Responses	Council's response
	The pre-submission regulation 19 consultation should be repeated once more details of ASELAs activities and the Joint Strategic Plan are known.	
Paragraphs 2.27 – 2.28 Chapter 2: Policy Context	 Support: Welcomes reference to strategic cross boundary matters. (Essex County Council RPLP/1685). Welcomes the opportunity to continue to work with Basildon Council in line with the Duty to Cooperate. (Brentwood Borough Council RPLP/1503). Other comment/s: The Council should prepare a Statement of Common Ground to support the ongoing engagement on strategic cross boundary matters. (Brentwood Borough Council RPLP/1503). Modification/s requested: The Council should prepare a Statement of Common Ground to support the ongoing engagement on strategic cross boundary matters. (Brentwood Borough Council RPLP/1503). 	A SoCG with Brentwood will be prepared indicating how the Duty to Cooperate has been undertaken to inform each of the authority's plans. This will be additional to the South Essex SoCG agreed in June 2018 which forms the basis for the JSP.
Chapter 2: Policy Context	Objection: • Chapter 2 does not make reference to the Natural Environment and Rural Communities Act 2006 and the Essex Biodiversity Action Plan.	The Local Plan has been prepared within the context of the English planning system in accordance with the NPPF, having regard to a proportionate evidence base and relevant other

Section/Para/ Policy	Summary of Responses	Council's response
	 There has been no coordination between Brentwood and Basildon Councils to agree on the Dunton Garden Village plans. Central Government should be responsible for planning homes in the South East of England. Central Government should build a new town with access to strategic transport networks. The site owned by Ford Motors in Dagenham will become a suitable brownfield site. Modification/s requested: A new town should built by Central Government outside the borough boundary. 	policies. It is not for the Basildon Local Plan to plan for housing in other areas. In relation to the Dunton Hills Garden Village proposals, Basildon Council and Brentwood Council have sought to engage to address issues with this proposal. However, they have not been able to reach an agreement for those reasons set out in the Council's response to the consultation on Brentwood's Regulation 19 Local Plan. The concerns of Basildon are shared by Thurrock Council and ECC.
Chapter 3: Spatial	Chapter 3: Spatial Portrait	
Paragraphs 3.3 – 3.5 Chapter 3: Spatial Portrait	 Other comment/s: Observations regarding wording changes to the topic heading of paragraphs 3.3 - 3.5. (Historic England RPLP/2127). Requests that reference should be made to non-designated heritage assets within paragraph 3.5. (Historic England RPLP/2127). Modification/s requested: 	The Council considers that the wording changes sought by Historic England are required in light of comments received, for the purpose of clarity.

Section/Para/ Policy	Summary of Responses	Council's response
	• Suggested wording changes to paragraphs 3.3 - 3.5. (Historic England RPLP/2127).	
Paragraph 3.10 Chapter 3: Spatial Portrait	Other comment/s: Requests wording changes to paragraph 3.10 with regard to Crossrail services. (Essex County Council RPLP/1686). Modification/s requested: Suggested wording changes to paragraph 3.10. (Essex County Council RPLP/1686).	The Council considers that the wording changes sought by ECC are required in light of comments received, for the purpose of accuracy.
Paragraphs 3.14 – 3.18 Chapter 3: Spatial Portrait	 Objection: There should be a policy to preserve existing house types/character in Billericay. Object to housing development in Billericay due to insufficient infrastructure. The OAN is overstated against needs. Other comment/s: Requests that reference should be made to Early Years and Childcare, and Special Education Needs as part of the education provision in the borough. (Essex County Council RPLP/1689). Modification/s requested: Change and clarification required in paragraphs 3.15-3.18 to include reference to the provision of Early Years and 	ECC seek reference to Early Years, Childcare and Special Education Needs. It is agreed that this modification should be made for the purposes of clarity and completeness. Specific reference is sought in chapter 3 with regard to the need to preserve house types and character in Billericay. The plan should be read as a whole. Chapter 12 addresses those matters relating to protecting and enhancing the quality and local distinctiveness of the Borough's built environment through high quality and inclusive design. No amendment is needed to chapter 3.

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There is an objection in relation to the

be an appropriate assessment of need.

Chapter 4: Drivers	Council RPLP/1689). • There should be a policy to preserve existing house types/character in Billericay. of Change	ability of the plan to secure infrastructure investment. There are various mechanisms available for securing the investment necessary to deliver infrastructure and these are set out in Chapter 18 and in the Infrastructure Delivery Plan 2018. Putting a plan in place is key to being able to secure investment from some of these sources. The issue has been raised regarding the appropriateness of the OAN for housing, suggesting it is too high. It has been calculated in accordance with national policy and guidance and is considered to be an appropriate assessment of need.
Paragraphs 4.2 – 4.6 Chapter 4: Drivers of Change	Objection: The OAN is overstated against needs. The duty to co-operate should be used to meet the needs outside the borough. Suggested wording changes to paragraph 4.2.	The issue has been raised regarding the appropriateness of the OAN for housing, suggesting it is too high. It has been calculated in accordance with national policy and guidance and is considered to
Drivers of Change	 Suggested wording changes to paragraph 4.2. 	policy and guidance and is considered to

Summary of Responses

Childcare; and Special Education Needs. (Essex County

• Object to the site selection process for housing allocations.

Section/Para/ Policy	Summary of Responses	Council's response
	Modification/s requested: Suggested wording changes to paragraph 4.2. Re-work the Objectively Assessed Need for housing in the borough. Do not build on the Green Belt land.	It is suggested that the Duty to Cooperate should be used to meet housing needs outside the Borough. All the authorities in South Essex are similarly constrained, and a Joint Strategic Plan for South Essex is being prepared, with the proposals in this Local Plan contributing towards the joint ambitions for growth and infrastructure set out in that Strategy. The site selection process has been challenged. The Council considers that a robust and transparent process has been applied to the selection of sites. The evidence was drawn together in the Housing Options Topic Paper and this was used to inform, and later record the decision making process of the Council. Some wording modifications are proposed in respect of paragraph 4.2. The Council agrees that where appropriate, some wording changes are necessary for the purpose of clarity. It is however not considered that all the

Section/Para/ Policy	Summary of Responses	Council's response
		wording changes proposed would serve a clear purpose.
Paragraphs 4.14 - 4.15 Chapter 4: Drivers of Change	 Support: Welcomes the recognition of the economic role of the A127 Enterprise Corridor. (Ford Motor Company RPLP/2000). General support for the recognition to manage the impacts of the Lower Thames Crossing, and requests that this be extended to the wider strategic highway network. (Transport for London (TfL) RPLP/1868). 	The Local Plan has been prepared within the context of the English planning system in accordance with the NPPF, having regard to a proportionate evidence base and relevant other policies. It is not for the Basildon Local Plan to plan for housing in other areas.
	 Objection: There has been no coordination between Brentwood and Basildon Councils to agree on the Dunton Garden Village plans. Central Government should be responsible for planning homes in the South East of England. Central Government should build a new town with access to strategic transport networks. The site owned by Ford Motors in Dagenham will become a suitable brownfield site. Other comment/s:	In relation to the Dunton Hills Garden Village proposals, Basildon Council and Brentwood Council have sought to engage to address issues with this proposal. However, they have not been able to reach an agreement for those reasons set out in the Council's response to the consultation on Brentwood's Regulation 19 Local Plan. The concerns of Basildon are shared by Thurrock Council and ECC.
	 The list of significant projects in South Essex should be updated to include the A127/A130 Fairglen Interchange Improvement Schemes. (Essex County Council RPLP/1690). 	Amendments to this section have been proposed by ECC and TfL for the purpose of improving its clarity and

Section/Para/ Policy	Summary of Responses	Council's response
	 Observations regarding wording changes to paragraph 4.15. (Essex County Council RPLP/1690). Modification/s requested: Suggested wording changes to paragraph 4.15. (Essex County Council RPLP/1690). Extend the reference to Lower Thames Crossing needing careful management to the wider highway network in the surrounding area and strategic routes. (Transport for London (TfL) RPLP/1868). A new town should built by Central Government outside the borough boundary. 	accuracy. It is agreed that these modifications are appropriate.

Chapter 5: Vison	Support:
and Objectives	 Supportive of the plan period of the emerging Local Plan. (Wick 3 Nominees Ltd RPLP/1916). Support the vision and strategic objectives of the Local Plan. (Chelmsford City Council RPLP/1640).
	 General support for the vision and strategic objectives of the
	Local Plan, but consider these ineffective as cannot be delivered over the plan period. (St Modwen Developments Ltd RPLP/1947).
	 Supports the vision of the Local Plan. (Taylor Wimpey RPLP/1947).

Whilst the vision is generally supported, in particular by those with allocated sites, there are some concerns expressed about its deliverability. The Council is confident that the plan, and its vision can be delivered.

There is an objection to the vision by the promoter of land to the west of Bowers Gifford. Policy SD3 provides Bowers Gifford and North Benfleet Parish

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Section/Para/ Policy	Summary of Responses	Council's response
	 Objection: The development of land West of Bowers Gifford & North Benfleet would contribute towards the Local Plan vision and strategic objectives. (GL Hearn RPLP/2128). Other comment/s: General support for the vision and strategic objectives of the Local Plan, but consider these ineffective as cannot be delivered over the plan period. (St Modwen Developments Ltd RPLP/2082). Modification/s requested: Develop land West of Bowers Gifford & North Benfleet as it would contribute towards the Local Plan vision and strategic objectives. (GL Hearn RPLP/2128). 	Council with a housing target, and it is for the Neighbourhood Plan in that area to identify specific sites within the parish. That Neighbourhood Plan should however be developed in conformity with the Local Plan to meet the basic conditions.
Paragraphs 5.1 – 5.3 Chapter 5: Vision and Objectives	 Objection: Requests an early review of the plan in order to address the shortfall in housing land supply. (Scott Properties and McCarthy & Stone RPLP/2257). There should be a policy to preserve existing house types/character in Billericay. Object to housing development in Billericay due to insufficient infrastructure. The OAN is overstated against needs. There is no objective to avoid flood risk. 	There are numerous objections to the plans objectives. The first objection relates to plan review. Policy SD1 is clear that the plan will be reviewed once the JSP is complete. Otherwise, it is now a national requirement that plans are reviewed every five years.

Section/Para/ Policy	Summary of Responses	Council's response
	 There is no objective to improve air quality. There is no objective to reduce or avoid noise pollution. There is no objective to support farming as a sustainable land use. There is no objective to maintain the extent or minimise loss of Green Belt. Other comment/s: Requests wording changes to paragraph 5.2 to recognise the range of professionals involved in delivering education and skills. (Essex County Council RPLP/1691). Modification/s requested: Conduct an early review of the plan in order to address the shortfall in housing land supply. (Scott Properties and McCarthy & Stone RPLP/2257). Suggests wording changes to paragraph 5.2 to recognise the range of professionals involved in delivering education and skills. (Essex County Council RPLP/1691). There should be a policy to preserve existing house types/character in Billericay. Amend paragraph 5.3 to include additional Strategic Objectives covering environmental matters. 	The second objection relates to preserving existing house types and character in Billericay. The plan should be read as a whole. Chapter 12 addresses those matters relating to protecting and enhancing the quality and local distinctiveness of the Borough's built environment through high quality and inclusive design. The third objection relates to the scale of growth in Billericay relative to infrastructure capacity. The Council has engaged with infrastructure providers in the preparation of the Local Plan, and the IDP indicates how the infrastructure capacity in Billericay will be increased to accommodate growth. The fourth objection relates to the OAN for housing, suggesting it is too high. It has been calculated in accordance with national policy and guidance and is considered to be an appropriate assessment of need. There are also a series of objections
		suggesting the Strategic Objectives do

Section/Para/ Policy	Summary of Responses	Council's response
		not cover environmental matters. These are clearly covered in Strategic Objectives SO1, SO2 and SO3.
		ECC have sought amendments to paragraph 5.2 to widen the range of professionals need to support the delivery of education and skills. This amendment is supported by the Council as it provides clarity.
Paragraph 5.3 Strategic Objectives SO1 to SO10 Chapter 5: Vision	 Support: Support for the commitment to protect and enhance the natural environment. (Essex Wildlife Trust RPLP/1828). Support for Strategic Objective 8 (SO8). (Sport England RPLP/817). Objection: 	Rejected - Ongoing engagement is had with developers as well as annual gathering of site information through the HELAA Review to ensure sufficient funding for infrastructure and viability and deliverability of housing allocations.
and Objectives	 Concerned that there is insufficient funding for infrastructure. (Billericay District Residents Association RPLP/1623). Concerns regarding the viability and deliverability of housing allocations. (Billericay District Residents Association RPLP/1623). Object to development on Green Belt land. Requests that reference be made to the Standard 	Rejected – Reference to the Standard Methodology for calculating housing need is given within Chapter 6. Rejected – Land at Kingsmans Farm - The Housing Options Topic Paper explains how the Council has considered all the housing site options, using the
	 Requests that reference be made to the Standard Methodology for calculating housing need within SO6. (Redrow Homes Ltd RPLP/2208). 	·

Section/Para/ Policy	Summary of Responses	Council's response
	 Suggests that the Council meets its full Objectively Assessed Housing Needs, by allocating additional suitable sites including the additional land at Kingsmans Farm. (Taylor Wimpey RPLP/1947). Suggests that the Council meets its full Objectively Assessed Housing Needs, by allocating additional suitable sites including land north of Wash Road. (Southern and Regional Development Ltd RPLP/2083). SO5 should recognise the physical, environmental and infrastructure constraints to meeting the borough's economic needs. Less land should be provided in meeting the objectively assessed housing need. Suggests wording changes to SO10 to promote a reduction of in commuting. Other comment/s: The developer's alternative proposal for allocation H12 would achieve a better balance of the strategic objectives, compared to the Local Plan proposal. (Pigeon (Wickford) Ltd RPLP/2231). The Council should give consideration to pooling the financial contributions from various developments, in order to help deliver health infrastructure. (NHS England RPLP/2500). 	inform their decisions. A Housing Omission Sites Topic Paper has also been prepared to give further clarification on the borough's housing supply position. Rejected – Land at Wash Road – The site has been tested for accommodating housing development through the local plan preparation process, but has been discounted despite its inclusion in a previous version of the plan. The final selection of housing sites allocated within the Revised Publication Local Plan have been informed by an extensive evidence base, including the Housing Options Topic Paper. The Housing Options Topic Paper draws together evidence related to housing capacity and constraints on growth, and gives an explanation on how the Council has considered all the housing site options, using the extensive evidence base available to inform their decisions. A Housing Omission Sites Topic Paper has also been prepared to give further

Section/Para/ Policy	Summary of Responses	Council's response
	 Requests wording changes to paragraph 5.3 - SO1 to reference net measurable biodiversity gain. (Essex Wildlife Trust RPLP/1830). Requests wording changes to paragraph 5.3 - SO2, to include reference to how land within the Green Belt can be accessed for public enjoyment. (Southern and Regional Development Ltd RPLP/2070). Requests wording changes to paragraph 5.3 - SO3, to include reference to mitigating flood risk. (Essex County Council RPLP/1692). Suggested wording changes to paragraph 5.3 SO3 to include reference to air, noise, water and light pollution. Requests wording changes to paragraph 5.3 - SO6, to account for the Council's shortfall in meeting its housing needs. (Southern and Regional Development Ltd RPLP/2083). Requests wording changes to paragraph 5.3 - SO8, to include reference to access for all user groups. (Essex Bridleways Association RPLP/355). Requests wording changes to paragraph 5.3 - SO10, to include reference to improving connectivity between the 	clarification on the borough's housing supply position. Rejected - The Local Plan is informed by up-to-date evidence regarding housing development sites and it is rejected that an alternative masterplan proposal for H12 be used. Rejected - The Local Plan is informed by up-to-date evidence regarding housing development sites and it is not suggested that housing allocation be redistributed. Rejected - It is not considered that the wording change to promote a reduction of in commuting would serve a clear purpose.
	sustainable transport networks. (Essex County Council RPLP/1693).	The Council will give consideration to pooling contributions.
	 sustainable transport networks. (Essex County Council RPLP/1693). Requests wording changes to paragraph 5.3 - SO10, to include a recognition of the importance of developer 	_
	contributions to delivering infrastructure improvements. (Southern and Regional Development Ltd RPLP/2085).	reference net measurable biodiversity

Section/Para/ Policy	Summary of Responses	Council's response
	 Suggests that more housing be allocated to Billericay. Modification/s requested: Provide evidence of engagement with developers/site promoters to seek confirmation that the site proposed for allocation will be viable and deliverable taking into account the CIL, affordable housing and other site specific requirements. (Billericay District Residents Association RPLP/1623). Incorporate the developer's alternative masterplan proposal for allocation H12 instead of the Local Plan proposal. (Pigeon (Wickford) Ltd RPLP/2231). Allocated land at Wash Road. (Southern and Regional Development Ltd RPLP/2083). Allocate additional land at Kingsman Farm to help meet OAN. (Taylor Wimpey RPLP/1947). The Council should give consideration to pooling the financial contributions from various developments, in order to help deliver health infrastructure. (NHS England RPLP/2500). Requests that reference be made to the Standard Methodology for calculating housing need within SO6. (Redrow Homes Ltd RPLP/2208). Suggested wording changes to paragraph 5.3 SO1 to reference net measurable biodiversity gain. (Essex Wildlife Trust RPLP/1830). Suggested wording changes to paragraph 5.3 SO2 to include reference to how land within the Green Belt can be accessed 	gain. This amendment is supported by the Council as it provides clarity. Rejected - It is not considered that the additional text proposed to SO2 to include reference to how land within the Green Belt can be accessed for public enjoyment would serve a clear purpose. The NPPF advises that plans should contain policies that are clearly written and unambiguous. EEC have suggested additional wording to SO3 to include reference to mitigating flood risk. This amendment is supported by the Council as it provides clarity. Amendments to SO3 have been suggested to include reference to air, noise, water and light pollution. This amendment is supported by the Council as it provides clarity. An amendment to SO6 has been suggested by a developer to address the Council's shortfall in meeting its housing needs, for the purpose of clarity.

Section/Para/ Policy	Summary of Responses	Council's response
	 for public enjoyment. (Southern and Regional Development Ltd RPLP/2070). Suggested wording changes to paragraph 5.3 SO3 to include reference to mitigating flood risk. (Essex County Council RPLP/1692). Suggested wording changes to paragraph 5.3 SO3 to include reference to air, noise, water and light pollution. Suggested wording changes to SO5 to recognise the physical, environmental and infrastructure constraints to meeting the borough's economic needs. Suggested wording changes to paragraph 5.3 SO6 to account for the Council's shortfall in meeting its housing needs. (Southern and Regional Development Ltd RPLP/2083). Suggested wording changes to paragraph 5.3 SO8 to include reference to access for all user groups. (Essex Bridleways Association RPLP/355). Suggested wording changes to SO10 to promote a reduction of in commuting. Suggested wording changes to paragraph 5.3 SO10 to include reference to improving connectivity between the sustainable transport networks. (Essex County Council RPLP/1693). Suggested wording changes to paragraph 5.3 SO10 to include a recognition of the importance of developer contributions to delivering infrastructure improvements. (Southern and Regional Development Ltd RPLP/2085). 	However, it remains important to continue to highlight the Council's objective of providing sufficient homes - whether this is within its boundary or through other cross boundary strategies. Essex Bridleways Association have suggested additional wording to SO8 to include reference to access for all user groups. This amendment is supported by the Council as it provides clarity. ECC have suggested additional wording to SO10 to include reference to improving connectivity between the sustainable transport networks. This amendment is supported by the Council as it provides clarity. Amendments to SO10 have been suggested by a developer to include a recognition of the importance of developer contributions to delivering infrastructure improvements. This amendment is supported by the Council as it provides clarity.

Section/Para/ Policy	Summary of Responses	Council's response
	 The Council should maximise and intensify the re-use of previously developed land and raise housing density. The objectively assessed need for housing should not be met if there are environmental constraints. Suggests that more housing be allocated to Billericay. Development should not take place on existing green belt land or result in the destruction of ancient woodlands. The plan should therefore be modified to ensure that development is inline with the stated objective. 	Rejected - The Local Plan is informed by up-to-date evidence regarding housing development sites and provided less land is not supported. Rejected - the Local Plan has been determined by local Members based on a suite of evidence which included a Green Belt Review.
Chapter 6: Achiev	ring Sustainable Development	
Chapter 6: Achieving Sustainable Development	 Objection: Housing growth is not required in Billericay. Objects to development on Green Belt. Development should not impact on ancient woodland. Lack of infrastructure. Green Belt development will impact on wildlife and air quality. Infrastructure should come first. Unauthorised developments in Hovefields should not be legalised. Growth in Wickford cannot be supported by infrastructure. New Towns should be created in Essex instead, rather than extending existing towns. Understands the need for housing need in Borough, but not specifically in Billericay. 	The Council considers the policies within Chapter 6 set out a clear, strategic framework for achieving sustainable development in the Borough, in compliance with national policy and informed by evidence. Chapter 6 is generally supported by statutory bodies, although some modifications are sought to enhance policy, as set out against the individual policies. Policy SD1, supported by SD2, SD3 and SD4 establishes the strategic approach to development in the Borough. It sets a

Section/Para/ Policy	Summary of Responses	Council's response
	 Concerns about affordable housing. Concerns about peak time congestion and traffic, particularly in Greens Farm Lane and Potash Road and what this means for quality of life. Concerns about drainage and flooding. Concern about school capacity. Insufficient infrastructure. Reduce the number of houses proposed for Billericay. Concern about the overprovision of housing Billericay. Lack of employment proposed in Billericay. Concerned about overcrowding commuter routes. Concerns about traffic and congestion. New roads and junctions will be required throughout Billericay to make it work. Car parking concerns for the High Street. Loss of Green Belt will damage environment. No exceptional circumstances given for loss of Green Belt. Approach in Local Plan for Billericay conflicts with NPPF. Insufficient GP/health provision. Recommends new Outpatients Centre should be built in E6 -Burnt Mills Previous consultation comments were not taken into account through the Local Plan process. Lack of consultation. Lack of Sustainability analysis for housing. 	housing and employment land target and in recognition that not all development can take place at the same time, establishes a staggered minimum housing delivery target until 2034. It acknowledges that having accounted for development that could be reasonably accommodated in the urban area that the Green Belt has been reviewed to accommodate the majority of the remaining growth, whilst continuing to protect the remaining Green Belt from urban sprawl, particularly those areas of higher landscape, ecological or flood risk value. It appreciates that in order to realise the benefits of economic growth, new jobs will need to be focussed on particular sectors and that development will need to be phased to enable the provision of services and infrastructure alongside development. The Council has prepared alone, or with partners, statutory bodies, service providers, evidence that has evaluated the state of the borough in social, economic and environmental terms and

Section/Para/ Policy	Summary of Responses	Council's response
	 Lack of transport and highways evidence. No exceptional circumstances to alter Green Belt. Local plan has not been positively prepared. 80% of residents objected to the Draft Local Plan proposals for 1,700 homes. There should have been a further regulation 18 consultation on the revised number of homes for Billericay. Transport links are at capacity. There is no transport evidence to support the Local Plan. The relief road will not relieve congestion in Billericay. Agricultural land is needed for food production. No new employment for Billericay residents. Basildon is a more suitable location for growth than Billericay. Car parking concerns for Billericay town. Inadequate appraisal of traffic and public transport issues. The plan will negatively impact on the character of Billericay. The plan will have a negative impact on the wellbeing of Billericay residents. 255 homes at H16 will impact on road network in north Billericay. Potash Road narrow and difficult to pass. Nearest local centre is far away and people would drive to it causing congestion parking issues. No statement for providing additional healthcare to support increased population. 	has proposed to manage adverse impacts, created by development proposals with general or specific mitigation measures. Where necessary these have been included within the strategic, site allocation or development management policies within the rest of the Plan. Policy SD2 establishes how housing and economic growth targets set by SD1 will be distributed to each of the main settlements both within appropriate urban locations, including suitable brownfield sites and on land beyond the urban boundaries, where Green Belt boundaries must be amended. In recognition for the role of the Localism agenda, Policy SD3 acknowledges the efforts of local communities to shape their areas through Neighbourhood Plans, by setting appropriate housing targets for Bowers Gifford and North Benfleet and Ramsden Bellhouse Neighbourhood Plans, permitting them to

Section/Para/ Policy	Summary of Responses	Council's response
	 Concerns about traffic and infrastructure - particularly Tye Common Road and London Road junctions. Concern about highway safety. Not addressing routes over railway line where existing congestion occurs. Lack of police presence. At point 6 (Policy SD1) the aim should be explicitly stated growth and infrastructure improvements are to reduce inequality and deprivation. Modification/s requested: Brownfield land should be built on first. Build sufficient affordable homes. Create New Towns in Essex rather than extending existing towns. Reduce the number of houses proposed. Reduce the number of houses proposed for Billericay. Reduce number of houses at H17. Provide sufficient infrastructure. Consider impacts on drainage and flooding. Consider impacts on school capacity. Consider impacts on wildlife. Consider impacts on air quality. Housing should only be for local residents. Do not build on Green Belt. 	exceptionally amend their Green Belt boundaries. The Council considers the Plan's proposals to permit minor amendments to the Green Belt and limited infilling within the Green Belt as being in accordance with national policy and will enable some growth to be small-scale of the edges of existing settlements, including providing opportunities for Self-Build. Finally, it establishes two Broad Locations to the south of Crays Hill and Wickford where potential housing growth will be considered in the next review of the plan, once options for strategic infrastructure solutions in these areas are established. The Council has incorporated policies within the Local Plan to limit sources of pollution and protect amenity. -There has been suggestions that a range of changes should occur to this

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	 Justify the exceptional circumstances given for loss of Green Belt. Reduce the extent of development. Amend policy E6 to include an outpatient's centre. Scrap the plan and start again. The Council should carry out another Regulation 18 consultation. Engage with transport providers. Improve road network. Provide more trains. Consider the impacts of H16 on the highway network. Provide information in terms of additional healthcare. Provide police station in Billericay. add "and reduce inequality and deprivation" to policy SD1 point 6 	chapter including calculating the growth targets differently, lowering/ raising the housing target, changing the distribution of development around the Borough/ within specific settlements, reducing/ increasing the allocated sites, providing different types of infrastructure, phasing development differently. The Council considers that it has undertaken necessary studies to inform its policy choices including reviews of options for spatial distribution, land availability and suitability. It has reviewed Green Belt, landscape capacity and sensitivity and reached the conclusion that exceptional circumstances exist to amend the boundaries. It has accounted for locations ecological, flood risk and historic sensitivities. It has reviewed infrastructure capacity, as much as possible, and engaged with commissioners and providers as required by national policy to test where enhancements are needed to support development, as well as prepared a stand-alone Infrastructure Delivery Plan that will be more frequently reviewed to

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		coordinate infrastructure upgrades. Whilst there are public demands for some specific forms of infrastructure in specific locations, these have not been included in the plan, if service providers have not requested them to be. The results of this evidence has informed other policies in the Plan where relevant. The Council has also undertaken an iterative Sustainability Appraisal, incorporating Strategic Environmental Assessment, as well as a Habitat Regulations Assessment to inform the Plan's policy development. It has accepted that for development to be sustainable it must come forward under a phased implementation approach to enable upgrades to occur in time to limit the impact from growth.
		There have been suggestions that the Council should have looked to create a new settlement in the Borough, as an alternative to urban extensions in every town/village. Whilst other suggestions have been that the Council should have looked to export the Borough's growth to

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		other parts of Essex/ elsewhere in the country to safeguard the Borough's Green Belt. Options for new settlements in the Borough however, do not deliver the development required against needs on their own. The relatively small size of the Borough also means that new settlement options would be limited to creating new villages from scratch, or expanding existing villages, which would not necessarily be more sustainable than expanding the existing towns where more services and facilities already exist, albeit they may need investment to improve their capacity. Creating New Towns in the rest of Essex/ other parts of the country is not a matter for the Basildon Borough Local Plan, rather it is a matter for other local planning authorities' Local Plans and any Joint Strategic Plans underway.
		There have been calls for the Plan to be abandoned and recommenced, however, this is not in accordance with the Council's legal obligations or statutory timetable for preparing the Local Plan.

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		There have been demands for further consultation and for the Council to repeat a Regulation 18 consultation given the changes that have been incorporated into the Revised Publication Local Plan 2018 that were not in the Draft Local Plan 2016. The Council does not consider this necessary as the Plan has been prepared in accordance with the Regulations, the Council's Statement of Community Involvement and to delay the Plan, to carry out further consultation, would not be in accordance with its statutory Local Development Scheme 2018-2020. The Council acknowledges that one of the Local Plan's Strategic Objectives is
		to reduce reducing inequality and deprivation and as such it does not need to be mentioned in SD1.
Paragraphs 6.2 – 6.5	Objection: Objects to Dunton Garden Suburb. Criticises consultation from 2015.	The Council has not pursued plans within its Local Plan for Dunton Garden Suburb with Brentwood Borough Council

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Policy SD1: A Strategic Approach to Sustainable Development in Basildon Borough	 Concern about impact on wildlife. Objects to development on Green Belt. Concerns about urban sprawl. Insufficient infrastructure. Suggests Urban Regeneration Company like Ebbsfleet leads on its development. Concerns that CIL will deter provision of affordable housing. It must be made clear that where adverse impacts are unavoidable, severe and unmitigatable - or not reasonably or practically mitigatable - compensatory measures may be inappropriate. In these circumstances the development should be avoided. The JSP is not adopted and may never be, so the Local Plan should not be written as if to imply that aspects of the plan rely on the JSP and its mention at this time, is a distraction, at worst it is a dereliction of duty. Other comment/s: The Council should prepare a Statement of Common Ground to support the ongoing engagement on strategic cross boundary matters. (Brentwood Roman Catholic Diocese Trustee RPLP/1887). Developer is promoting Land at Foots Farm, Billericay for housing development. (Brentwood Roman Catholic Diocese Trustee RPLP/1887). 	as consulted in 2015, given it was considered that insufficient evidence had been provided by Brentwood Borough Council to indicate that it was the most appropriate location for development in their area. As such, the Council did not include this proposal as a preferred allocation within the Draft Local Plan 2016. The Council considers that previous consultation responses have been considered throughout the local plan process, as documented within the associated Statements of Consultation. In developing SD1 and its supporting text, the Council has – undertaken necessary studies to inform its policy choices including reviews of options for spatial distribution, land availability, suitability and Sustainability Appraisal. It has reviewed housing and economic development needs. It has reviewed landscape capacity and sensitivity, together with reviews of the historic and natural environment. It has carried out a

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	 Agree a strategy for how unmet need will be accommodated elsewhere. (Brentwood Roman Catholic Diocese Trustee RPLP/1887). Modification/s requested: The Council should prepare a Statement of Common Ground to support the ongoing engagement on strategic cross boundary matters. (Brentwood Roman Catholic Diocese Trustee RPLP/1887). Allocate land at Foots Farm, Billericay for housing development. (Brentwood Roman Catholic Diocese Trustee RPLP/1887). Consider how unmet need will be met. (Brentwood Roman Catholic Diocese Trustee RPLP/1887). Add new sentence to 6.2 to say: - Where significant adverse impacts exists and cannot be mitigated, development should be avoided or words to that effect. Delete paragraph 6.4 and 6.5 about the JSP. Ensure previous consultation comments received throughout the Local Plan process have considered. 	comprehensive Green Belt Study. In drawing this together it has reached the conclusion that exceptional circumstances exist to amend the Green Belt boundaries. It has accounted for locations' ecological, flood risk and historic sensitivities. It has reviewed infrastructure capacity, as much as possible, and engaged with commissioners and providers, as required by national policy, to test where enhancements are needed to support development, as well as prepared a stand-alone Infrastructure Delivery Plan that will be more frequently reviewed to coordinate infrastructure upgrades. The Council notes the role Urban Regeneration Companies (URC), or similar public/private partnerships/ joint ventures can have in delivering urban regeneration. Affordable housing cannot be secured through CIL, rather it has to be secured through a planning obligation/S106 agreement. The setting of policy

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		thresholds for affordable housing is a matter for the Local Plan, and not for CIL. The Council has undertaken a Whole Plan Viability Assessment as part of its evidence, to help determine if the various policy requirements stipulated in the Local Plan can be accommodated alongside CIL and to what extent must CIL rates be set in order to ensure development remains viable. Paragraph 6.2 restates the wording extent of what is set out in Paragraph 32 of the NPPF. The Local Plan has been informed by an iterative Sustainability
		Appraisal (incorporating Strategic Environmental Assessment) and a Habitat Regulations Assessment, which have subjected the plan to vigorous tests to determine if the Plan can meet the terms of that paragraph, as well as paragraph 177 of the NPPF. In respects of "Land at Foots Farm,
		Billericay" - this site has been tested for accommodating housing development through the local plan preparation

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Options Topic Paper draws together the extensive evidence related to housing capacity and constraints on growth, and gives an explanation on how the Council

Housing Omission Sites Topic Paper has

The Council is committed to prepare and

process, but was discounted. The final selection of housing sites allocated

have been informed by an extensive evidence base, including the Housing Options Topic Paper. The Housing

has considered all the housing site options, to inform their decisions. A

also been prepared to give further clarification the borough's housing

maintain Statements of Common Ground, where it is necessary to proactively manage and influence the outcomes of engagement on strategic and cross-boundary matters. Examples of this already include the South Essex JSP (2018) and the A127 (2017) and those undertaken as part of Local Plan

supply choices.

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		preparation such as Chelmsford City Council (2018).
		Comprehensive examination of wider Housing Market Area will be completed as part of the evidence for the South Essex Joint Strategic Plan, which consists of two Housing Market Areas; South Essex and Brentwood. The South Essex JSP Statement of Common Ground – June 2018 establishes the agreement that the JSP will determine if it can meet all of its needs and then in accordance with the Essex Planning Officers' Association Protocol for Unmet Housing Needs 2017, should unmet needs continue to exist, engagement will take place with other Housing Market Areas outside south Essex as part of the JSP preparation to determine whether that need can be met outside the JSP area.
		The Council does not consider that Paragraph 6.2 needs amending as it already states that "Significant adverse

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		impacts on any of these dimensions should be avoided".
		The Council considers the review of the Basildon Borough Local Plan to be a requirement of the National Planning Policy Framework and the plan will be reviewed, at least in part, within its first five years, whether the South Essex JSP has been adopted or not. Paragraphs 6.4 and 6.5 by mentioning the JSP is merely setting the context behind sub-regional planning in South Essex and stating the fact that a JSP is in the process of being prepared and once adopted, will therefore have an influence during the review of the Local Plan.
Paragraph 6.18 Policy SD1: A Strategic Approach to Sustainable Development in Basildon Borough	Objection: • The NPPF does not use the word "ensure" with respect to meeting the OAN. (RPLP/2518). Modification/s requested: • Delete "ensure that" and replace with "seek to meet this need".	Paragraph 6.18 will be amended with wording to ensure it is in consistent with the NPPF's intended role for Strategic Policies.

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Paragraph 6.23 Policy SD1: A Strategic Approach to Sustainable Development in Basildon Borough	Objection: Plan fails to demonstrate exceptional circumstances to amend Green Belt boundaries as housing need alone not considered exceptional. (CPREssex RPLP/1876). Modification/s requested: Requests further information regarding Duty to Cooperate and how the requirements have been met. (CPREssex RPLP/1876).	The Council has undertaken necessary studies to inform its policy choices including reviews of options for spatial distribution, land availability, suitability and Sustainability Appraisal. It has reviewed housing and economic development needs. It has reviewed landscape capacity and sensitivity, together with reviews of the historic and natural environment. It has carried out a comprehensive Green Belt Study. In drawing this together it has reached the conclusion that exceptional circumstances exist to amend the Green Belt boundaries. The Council accepts that the Duty to Cooperate Statement 2018 needs modifying prior to submission to enable the Council to document and evidence up to date compliance with the Duty to Co-operate.
Paragraphs 6.24 - 6.27	Objection: Not meeting all housing need conflicts with the Local Plans Strategic Objective 6. (Redrow Homes Ltd RPLP/2210).	The Council considers that the Strategic Objectives should not be read in isolation and Strategic Objective 6 is caveated with "whilst recognising the challenges to

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Policy SD1: A Strategic Approach to Sustainable Development in Basildon Borough	 Notes the Local Plan does not meet is housing needs. (Braintree District Council RPLP/1845). Highlights the EPOA Methodology for meeting Unmet Housing Needs. (Braintree District Council RPLP/1845). Notes housing provision will be dealt with by the South Essex Joint Strategic Plan. (Braintree District Council RPLP/1845). Expects a comprehensive examination of the wider Housing Market Area to meet unmet need for approaching other areas. (Braintree District Council RPLP/1845). Notes Policy SD1 does not expect adjacent Housing Market Areas to meet unmet need. (Braintree District Council RPLP/1845). 	do so in respects of physical and environmental constraints and infrastructure planning. Policy SD1 establishes that the Council will work with authorities in South Essex to bring forward a Joint Strategic Plan (JSP) to deliver its collective OAN for housing and jobs. The Policy does not seek adjacent Housing Market Areas (HMAs) to meet unmet need. A comprehensive examination of wider HMA will be completed as part of the evidence for the South Essex JSP, which consists two HMAs; South Essex and Brentwood. The South Essex JSP Statement of Common Ground – June 2018 establishes the agreement that the JSP will determine if it can meet all of its needs within these HMAs and then in accordance with the Essex Planning Officers' Association Protocol for Unmet Housing Needs 2017, should unmet needs continue to exist, engagement will take place with other HMAs outside south Essex as part of the JSP

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		preparation to determine whether that need can be met outside the JSP area.
Paragraphs 6.29 - 6.30 Policy SD1: A Strategic Approach to Sustainable Development in Basildon Borough	 Objection: IDP is not a delivery plan and more a list of requirements as it is not funded. Funding gap is significant and reliant on CIL. Nothing in IDP as to how development will be phased or prioritised if funding not forthcoming. IDP lacks detail and commitments from other providers. Other comment/s: Recognises ambitious transport projects in Local Plan to deliver new homes. (Essex County Council RPLP/1694). Recognises the purpose of the South Essex Joint Strategic Plan to address cumulative strategic infrastructure improvements. (Essex County Council RPLP/1694). Modification/s requested: Should include sustainable transport solutions beyond strategic road network. (Essex County Council RPLP/1694). 	The IDP is a 'live' document and can be revised more frequently than the Local Plan. This way it is able to respond to changing circumstances, funding opportunities in the forms of bids to the Local Enterprise Partnership, the Department for Transport, Homes England and others as they are presented, to help accrue the funding needed, as part of and ahead of, development phases. The IDP has been developed through the direct engagement with service and infrastructure providers. It was open to formal consultation at Reg 18 and Reg 19 consultation stages and has evolved between these versions. The Council believes a CIL is necessary to contribute towards the shortfall of infrastructure funding. It is also, however, aware that other sources of funding will

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		be necessary to bring forward infrastructure alongside development.
		The Council agrees that references to sustainable transport solutions should be included within Paragraph 6.30.
Policy SD1: A Strategic Approach to Sustainable Development in Basildon Borough	 Support: Acknowledges alignment of South Essex 2050 vision and joint working. (Thurrock Borough Council RPLP/848). Welcomes progress on Basildon Local Plan. (Thurrock Borough Council RPLP/848). Supports the Local Plan in principle. (Thurrock Borough Council RPLP/848). Support for the provision of 92ha of employment land. (Chelmsford City Council RPLP/1642). 	Policy SD1 is generally supported by statutory bodies, however there have been challenges at the policy's failure to meet needs in full, as it has not allocated enough land to meet needs, as well as challenges on the role of the South Essex Joint Strategic Plan.
	 Objection: Concern that SD1 is unsound as it does not meet full housing needs and is unclear how it will be met. (Thurrock Borough Council RPLP/848). SD1 does not provide sufficient sites for housing growth during the plan period. (Thurrock Borough Council RPLP/848). Have concerns that the policies and evidence have changed as the plan has been prepared and think some have been made to fit the preferred choice of approach. (Billericay Action Group RPLP/1135). 	In developing SD1 and its supporting text, the Council has – undertaken necessary studies including reviews of options for spatial distribution between its settlements, land availability and suitability. It has reviewed Green Belt, landscape capacity and sensitivity and reached the conclusion that exceptional circumstances exist to amend the Green Belt boundaries to prevent urban sprawl.

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	 Questions rationale for sites in Billericay and what they could achieve in terms of new homes, in particular if they underestimate what could be accommodated and whether this higher growth has been tested. (Billericay Action Group RPLP/1135). South Essex has been taking London's overspill for more the 70 years and has fulfilled its potential. (Billericay Action Group RPLP/1135). To be an appropriate place for further growth would take massive central government investment and could not be delivered in the Plan Period. (Billericay Action Group RPLP/1135). For the area to grow by the amount suggested by the SHMA or higher would overwhelm the region's commuter links to London, damaging our local economy and, to a lesser extent, the City of London and Canary Wharf. (Billericay Action Group RPLP/1135). Highly unlikely that the investment of such large amounts of scarce funds will come to South Essex, more likely it will go to areas such as the Oxford-Cambridge arc which has genuine potential for economically successful growth. (Billericay Action Group RPLP/1135). Former Councillors have regretted levels of damaging growth. (Billericay Action Group RPLP/1135). Object to allocation site H16. (Cllr Dadds RPLP/4413). 	It has accounted for locations' ecological, flood risk and historic sensitivities. It has reviewed infrastructure capacity, as much as possible, and engaged with commissioners and providers, as required by national policy, to test where enhancements are needed to support development, as well as prepared a stand-alone Infrastructure Delivery Plan alongside infrastructure commissioners and providers that will be more frequently reviewed to coordinate infrastructure upgrades. Evidence is not static in nature and will have changed, when it has been reviewed following updates to national policy and guidance, following relevant feedback from consultations and engagement with other stakeholders, after independent reviews, and/or changing circumstances. This is considered to be consistent with what is expected of the plan-making process. To help develop and test the Plan's approach, the Council has undertaken

Section/Para/ Policy	Summary of Responses	Council's response
	 Additional sites allocated at Regulation 19 stage that were not considered at Regulation 18 stage. (Cllr Dadds RPLP/4413). Lack of consultation with public and local residents, especially on the significant housing number increase from 1,700 to 3,000. (Cllr Dadds RPLP/4413). The additional housing numbers are not sustainable in respect of highways, education, health, drainage and other social and physical infrastructure. (Cllr Dadds RPLP/4413). Additional housing sites offend the basic principles of Green Belt. (Cllr Dadds RPLP/4413). Decisions over locations of housing were due to political reasons. (Cllr Dadds RPLP/4413). The threat of intervention meant the now conservative lead council could not amend the plan as we wanted and in the time-table allowed without intervention by the Housing, Communities and Local Government Department. This is and was completely unsatisfactory and democratically defective and amounts to duress in my opinion. (Cllr Dadds RPLP/4413). Excessive number of homes for Billericay. Lots of homes for sale in Billericay already. Billericay's layout means it cannot be made bigger. Housing target has been set too high. Density of houses per site indicates that houses will be well above average size of family property. Plan is not legal or moral due to unrealistic housing targets. 	an iterative Sustainability Appraisal, incorporating Strategic Environmental Assessment, as well as a Habitat Regulations Assessment to inform the Plan's policy development. This has been prepared independently of the Council as 'plan-maker' and part of its purpose has been to challenge whether the plan can be regarded as sustainable and whether modifications have been needed to the policies, during their drafting, to strengthen how they can contribute more to social, economic and environmental sustainable development objectives. The Sustainability Appraisal, and the Local Plan in turn, accept that for development to be sustainable, it must come forward under a phased implementation approach to enable upgrades to occur in time to limit the impact from growth and secure opportunities to local communities, businesses, thereby strengthening the Borough's role within South Essex and Essex. This approach means that need cannot be met within the plan-period.

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	 Housing and population density already significantly higher than surrounding areas. Increased housing density will not create a healthy living environment. Bring empty homes back into use. Further overcrowding in South East not justified. Government should focus growth outside the South East. Borough wide, and Billericay housing targets considered high. Billericay cannot sustain such growth. Billericay is already eroded due to drive through traffic. Billericay already infilled. Concern about the size and types of homes. Lack of small properties to get on the housing ladder or bungalows to free up family homes. The plan will negatively impact on the character of Billericay. Not justifiable, effective or positively prepared for Billericay. Understands the need for housing need in Borough, but not specifically in Billericay. Housing should only be provided for local need. Amount of new homes in Billericay in not economically sustainable. The plan is not meeting its OAN. Disagrees with Spatial Strategy as started to try and be proportionate, but has not resulted in that. The OAN should reflect the housing need. 	The Plan acknowledges in Chapter 18: Implementation that growth will require investment, including from the Government and has set out an approach as to how it will seek to secure such investment. It is not possible for the Plan to predict the likelihood of investment from other sources over the entire duration of the Plan, but it has set out an Infrastructure Delivery Plan, which it intends to revise and update more frequently than the Local Plan, so that it is responsive to the need to unlock development locations through the phasing and timing of critical infrastructure. There have been demands for further consultation and for the Council to repeat a Regulation 18 consultation given the changes that have been incorporated into the Revised Publication Local Plan 2018 that were not in the Draft Local Plan 2016. The Council does not consider this necessary as the Plan will naturally evolve between versions. Locations have also been previously considered in the Core Strategy in some

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	 No justification given for increase in housing numbers as there was no change to the OAN. Housing growth needs revising due to Brexit. Impact of Brexit unclear and plan should be delayed until known. The plan makes provision for more homes than the Government requires. Lack of Sustainability analysis for housing. Higher CIL proposed for Billericay has resulted in more housing being proposed in Billericay. Higher CIL rate in Billericay will impact on affordable housing. Higher CIL rate passed onto buyer making houses more expensive. Development locations proposed are not sustainable. No justification given for need for housing near Frith Wood. Concern about the proposed rate of housing delivery in the plan period. Disproportionate housing allocations across the Borough. Concerns about the amount of new homes proposed. Houses not needed for local people and questions scale of need. No need for scale of jobs in South Essex or Basildon as companies are reducing employee numbers to increase efficiency and to relocate, this will reduce the number of new homes required. Concerns about affordability. 	locations, which was also consulted on under Regulation 18. The Plan has been prepared in accordance with the Regulations, the Council's Statement of Community Involvement and to delay the Plan to carry out further consultation would not be in accordance with its statutory Local Development Scheme 2018-2020. The Local Plan was developed by the Council in compliance with legislation, having had regard to national policy, a Sustainability Appraisal, Habitat Regulations Assessment, Service Impact Assessment (against Equalities Act 2010) Statements of Consultation, evidence and engagement with statutory bodies, neighbouring authorities, infrastructure commissioners and providers. Its development has been prepared under accountable governance, both under the Cabinet and Scrutiny system and the Committee system, as stipulated by the Council's Constitution. The Council approved by majority that the Revised Publication

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	 Cheaper affordable homes will not be product of the Plan, instead it will be executive homes. Younger generations find hard to buy home due to lack of new houses available. Brownfield land should be built on first. Housing allocations in Crays Hill will impact on village's character and Green Belt openness, with no affordable housing. Objects to the use of Green Belt which is against national policy as no exceptional circumstances. Objects to development on Green Belt. Green Belt use not justified and should be used as a constraint to growth instead. Billericay will suffer half of all Green Belt lost. Feels loss of Green Belt in Billericay is unfair. Need national or regional directive on Green Belt, not Local Authority that can change with political direction. Concern about the loss of Green Belt in Billericay generally and as a proportion of Green Belt loss in the Borough as whole. Objects to development at site allocation H17c and H17d due to Green Belt loss. H17d next to Frith Wood and will negatively affect wildlife. Objects to development at H20 as road is poorly maintained and would result in loss of Green Belt and wildlife. 	Local Plan should be published for public consultation and following consultation, it should be submitted to the Government. The Borough's housing target was determined based on a Strategic Housing Market Assessment which reviewed needs for new homes taking into account a range of socio-economic factors, including the level of empty homes, as guided by the NPPF and Planning Practice Guidance. The NPPF now stipulates that the Standard Methodology, as described in Planning Practice Guidance must now be used as the starting point, which does not correlate with local needs only. Only catering for local need, by reducing the amount of housing will therefore be against national policy and the Plan's evidence. The Plan considered how densities on greenfield sites should be set on a site by site basis, drawing from landscape evidence, with adjustments as necessary to account for proximity to railway

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	 400 homes in Greens Farm Lane seems excessive and would impact on wildlife. There will be a loss of accessible countryside. Views of countryside will be lost. No consideration for protected species and established trees. Concern about impact of development on wellbeing of humans and wildlife. The plan will have a negative impact on the wellbeing of residents. Concern loss of Green Belt will have a negative impact on habitats and the environment. Green Belt stops Billericay merging with Brentwood and Chelmsford. Concern over public transport, road maintenance, libraries, care for the elderly and future funding. Concern about congestion. Little proposed by way of road infrastructure. Plan is vague as to how new road proposals will be funded. 	stations and surrounding residential areas if relevant. The Plan sets out policies to ensure development can contribute to health and well-being. Protected Species and trees are considered in the Plan by Policies NE4 and NE5. The Green Belt Study which has informed the Plan has considered strategic gaps and the purpose of the Green Belt to prevent coalescence of settlements. Maintenance of roads, street-lighting, services and other forms of infrastructure is generally outside the remit of the Plan. Where upgrades can be justified as part of the Local Plan, due to the impact from
	 Concerns about added pollution and congestion. Concern about quality of traffic surveys and whether they are accurate. Transport provision needs improving. 	development, these have been incorporated into site specific policy criteria.
	 Transport limited in Billericay. One way system in Town Centre will not work. Growth will impact on the capacity of transport infrastructure. Risk of new rat-runs. 	Traffic surveys have been carried out in May 2011, October 2014, February 2016, November 2016 and either uplifted or reduced to reflect a 2014 base year

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	 Concerns about public transport capacity and scope for improvement. No direct bus services to Shenfield. Concern about highway safety. Concern about cyclist safety. Walking distances to services not considered. Relief Road is destroying ancient woodland. Relief Road will just become congested due to new development. Cost, impact and benefit of relief road unclear. Transport evidence has changed in Billericay with no justification. No consideration to existing road network and whether it can cater for growth. Objects to Relief Road. H17a housing allocation unsuitable to access from Mountnessing Road. Proposed developments around Tye Common Road and the surrounding area are disproportionate against any residual need for additional housing. More traffic on larger roads. Questions whether Billericay Relief Road would be needed if the new homes were not being built. Concern about increase in use of railway. New homes will be for commuters and so increase burden on station. 	before forecasting began. This is in accordance with the requirements of the NPPF 'Transport Evidence bases in Plan Making and Decision Taking' guidance and accurately reflects the Plan period 2014-2034. Billericay (including Little Burstead and Great Burstead & South Green), as a part of the Basildon Borough, has been reviewed as a settlement and appraised through a range of evidence including historic, built environment, Green belt, landscape, ecology, housing, economic development and land availability. The Council has determined that exceptional circumstances apply and Green Belt boundaries can be amended. This has helped determine how much growth the Council considers can be accommodated across the Borough and how this can be done sustainably through appropriate mitigation including specific design and character criteria, protection policies for natural assets such as ancient woodland, provision of new/expanded community facilities,

Section/Para/ Policy	Summary of Responses	Council's response
	 Railway is overcrowded. New development is not sited close to the railway. New Elizabeth line will not provide solution for commuters as appears to be slow/sloppy service to London. Trains are more expensive than c2c and yet are overcrowded, which will get worse with more homes. Insufficient analysis of train services and supporting facilities such as parking and how to address it. H17 Relief Road will not work. Roads need resurfacing. Existing carriageways cannot be enlarged. Billericay is used by vehicles using A176 as have to travel to town centre which is already congested and must be resolved before more houses are built. Roads are at capacity already. Billericay High St cannot cope with more traffic. Billericay town is over-crowded and will impact on current and new residents. Other roads in Billericay will be affected but there are no proposals to change this. Road and pavement improvements required. Unfair distribution of sites in Billericay as all seem to be in the South and little in the north. Congestion to A127 and station. Billericay Town FC does not seem to have been considered, which already affects locality on match days. 	infrastructure and open spaces and landscaping, etc. This development locations determined in Billericay are considered to be sustainable and will help the town evolve, improving the availability and choice of housing across tenures and sizes to help meet different needs, supported by necessary infrastructure. The presence of houses for sale in Billericay, is not an indicator that less homes are needed to be planned for in the future. The Council considers the Billericay Relief Road is needed to contribute towards improvements to highway capacity in Billericay and mitigate impacts of development. It is not proposed to dissect Frithwood Ancient Woodland. Its benefits, impact, design at existing inter-sections and cost estimates are set out in the South West Billericay High Level Development Framework and Transport and Highway Impact Assessment.

Section/Para/ Policy	Summary of Responses	Council's response
	 General infrastructure of the roads surrounding Tye Common have suffered including water pipes, flooding, road cracking, etc. Roadworks are causing delays and congestion. Lack of recent traffic and highway evidence. Does not agree with the findings of the highway modelling. Policy SD1 is flawed and not thought through. Not natural growth. Severe traffic affects Coxes Farm Road in Billericay - development nearby will make this worse. The misalignment of employment and housing provision in Billericay will increase traffic congestion. More data required on traffic impacts. Proposed road would divide Tye Common residents in half. Local congestion points in Billericay identified at High Street and Radford Way. Proposed 20% increase in population will put strain on transport and community infrastructure. This will not be addressed before the development occurs. Commuting into London is already a significant challenge. Car parking concerns for Billericay town. Parking concerns at the station. Parking in high street unreliable. Objects to loss of Radford Way car park. Make Radford car park multi-storey with free evening and weekend parking. 	Other highway improvements needed in Billericay have been informed by the Transport and Highway Impact Assessment. This identifies that junction improvements are required at B1007 High Street / Norsey Road / Western Road, London Road / High Street / Sun Street, A129 Southend Rd / Hickstars Lane, and includes two-way implementation on southern Laindon Road. All junction improvements and the relief road are set out in policy as being a requirement of any development proposal demonstrating the Council's commitment to their delivery. Further improvements could be brought forward by the planning application process, following engagement with the Highways Authority. The Plan includes a specific policy for Billericay Town Centre's enhancement to support its vitality and offer greater consumer choice where opportunities arise. It will support opportunities to enhance the public realm, including new public spaces and managed parking

Section/Para/ Policy	Summary of Responses	Council's response
	 Concern about residential parking and pavement suitability. Cars park on pavements causing restricted access for pedestrians. Concern about transport access to proposed strategic developments in Billericay. New homes in East Billericay will cause congestion. Infrastructure already at capacity and no consultation with service providers. Billericay Fire Station has limited crew, will it be upgraded to deal with the increased population. Insufficient infrastructure in Billericay. Insufficient infrastructure. Overloaded infrastructure. Lack of infrastructure. Will put immense strain on the local infrastructure, have ecological damage and will be unsustainable without massive infrastructure investment. Strain on infrastructure caused by more homes a concern. Infrastructure must come first. Do not even have a supermarket. No proposals to improve community infrastructure provision. No proposals to improve utilities. Insufficient GP/health provision. No commitment to improve healthcare facilities before new homes are built. 	spaces, as well as ensuring works carried out to buildings/ land respect the historic character and seek enhancements where possible. Comments have been received in relation to railway capacity. Proposed increases to railway capacity are set out in the Council's Infrastructure Delivery Plan. This includes, amongst other things notable journey time improvements and 55% more seats in the morning peak across the Liverpool Street line as part of the £1.4bn investment by the current franchise holder Abellio Greater Anglia. The Local Plan cannot influence train fares. The Elizabeth Line is a new 73 mile transport route connecting Reading (Berks) and Heathrow Airport in the west with Shenfield (Essex) and Abbey Wood (London) in the East. Journeys between Shenfield and Paddington are expected to improve by 13 minutes once the Elizabeth Line is operating.

Section/Para/ Policy	Summary of Responses	Council's response
	 New houses on edges of town will need more infrastructure such as local shops otherwise traffic will get worse. Basildon hospital/GPs/health services are at capacity. No financial commitment form NHS, funding gap of 70%. Parking at the hospital is bad and will be impacted. Lack of police presence. Concern about school capacity. School buses are full. Taxis are inadequate a peak times. Concerns about maintenance of current public assets and services. Lack of employment proposed in Billericay. No local jobs means commuting will increase. Concern about job security. Concern similar to last consultation. Lack of consultation. No second draft consultation on Local Plan. Resident's needs, views and hopes ignored. New homes will attract professionals and young families from London. Previous consultation comments were not taken into account through the Local Plan process. There should have been a further regulation 18 consultation on the revised number of homes for Billericay. Lack of consultation on H21a. 	The Highway Authority have advised the Council on where sites allocated for development must safely connection into the existing highway network. The Local Plan's Transport and Highways Impact Assessment and Mitigation Modelling has also considered safe and sustainable access for all users. Congestion has been a consideration in the development of the proposals across the Borough and the Council has worked with the Highways Authority to validate the baseline information used in modelling and identify ways the local highway network can be improved, as well as public transport providers to identify ways the Plan can support modal shift, to reduce road congestion and be compatible with train operators and Network Rail's plans to invest in stations and services in the future. Comments have also been received in relation to car parking capacity within Billericay High Street and at the railway station. The Essex Parking Standards -

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	 Insufficient information to comment. Concerns about impacts on commuting given house prices and lack of jobs provided locally. Plan not sustainable. Maintenance of existing street lights an issue. Consider impacts on air quality. The Council should work with neighbouring authorities. Concern over flooding. Concern about gas provision. Concern about drainage. Growth will put a strain on sewage capacity and drainage. Billericay already struggling to cope with sewage waste. Need new drainage to cope with restaurants opening. Concern about sustainable access to town centre. Concern about archaeological sites. Lack of leisure and recreation provision. No retail development proposed. Hovefields and Honiley Neighbourhood Forum has been omitted from the plan. Objects to relocation of cricket club. Objects to the relocation of the tennis and cricket clubs. Loss of green spaces. Greenfield areas in Billericay do not have services and infrastructure. 	Design & Good Practice (2009) is considered appropriate in the Borough because it promotes minimum requirements for parking for residential developments, but maximum requirements for parking in non-residential areas which is consistent with the NPPF, supporting sustainable travel modes. However, the Basildon Borough Vehicle Parking Capacity and Intervention Study 2017 recognises that there is parking congestion in these locations and therefore the policies in this Plan protect town centre and station car parking in such instances and will support proposals to increase parking where there is an identified shortfall. The development of Community Infrastructure Levy has not influenced the scale of growth to be distributed to Billericay. The Local Plan is based instead on evidence as to where the better sites could be located and contain infrastructure proposals for Billericay to mitigate the impacts of growth.

Section/Para/ Policy	Summary of Responses	Council's response
	 Concern about damage to local environment and resulting pollution. Concerns raised about the health impacts associated with the loss of Green Space, with the plans considered to be detrimental to local people. Local plan is funding local government and not solving housing crisis. Concern about increase in population expected. Billericay Town Centre requires regeneration. People will move out taking their income with them. 	The relocation of Billericay Cricket and Tennis Clubs are necessary to enable the development of the Billericay Relief Road and the housing allocation H17. The Council has engaged with the developers, the clubs and Sport England, informed by the South West Billericay High Level Development Framework to determining a suitable policy that will enable the relocation of the clubs.
	 Other comment/s: No specific comments to make on policies but would expect any mitigation identified through the SA as necessary to address impacts on biodiversity to be secured by relevant policies including funding mechanisms. (Natural England RPLP/2544). Modification/s requested: Improve transport provision. Improve railway provision. Plan does not address growth in demand for train services. Do not build the relief road. 	The concern about the development of various sites and the impact this would cause to wildlife, views and the landscape has been mitigated by the Plan. It has used independent ecology and landscape studies to inform site selection and specific criteria to retain natural features, public rights of way, etc. to manage and mitigate impact. The Council engaged with the Emergency Services to determine the
	 Provide new or vastly improved access roads between Billericay and the A12. Provide sufficient infrastructure. 	extent to which the Local Plan's proposed growth could impact on their needs in the future, including whether

Section/Para/ Policy	Summary of Responses	Council's response
	 Consider impacts on school capacity. Provide infrastructure first. Provide a new health centre in Great Burstead. Consider impacts on GP/health provision. Reduce the number of houses proposed for Billericay. Reduce the number of houses proposed. New Towns should be created in Essex instead, rather than extending existing towns. Ensure a more equal distribution of the proposed developments throughout Billericay, rather than primarily in the southern half. Consider empty properties. Carry out sustainability analysis for housing. Brownfield land should be built on first. Do not build on the Green Belt. Reduce the loss of Green Belt in Billericay. Give consideration to existing resident's quality of life. Locate new houses close to main road networks such as the A127 and A13. Provide new railway station between Billericay and Shenfield. Provide police station in Billericay. Do not get rid of the Radford Crescent car park. Liaise with public transport providers to sort out train situation. Build a bypass. Provide better public transport, and walking and cycling routes. 	those services were looking for additional operational bases and how whether, through their own funding mechanisms, they would seek to finance such investment. Any impacts of Brexit are not fully understood from a planning perspective and as such it would not be justified, and therefore sound, to make any policy decisions in the Local Plan based on this matter. The Plan sets new policies to encourage a range of house types, tenures and sizes to be provided with specific targets for housing mix, specialist accommodation for older people, adaptable homes and space standards. In addition, the Plan seeks to maximise the productivity of the existing housing stock, including bringing empty homes back into use. The Plan has set a new affordable housing target, but how those new properties are allocated to individuals

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Section/Para/ Policy	Summary of Responses	Council's response
	 A review current traffic, access for heavy vehicles, parking availability and speed limit compliance are necessary if traffic flow is to improve. Review efficiency of public transport. Provide sufficient affordable housing. Allocate the HHNA with a housing number. Scrap the plan. Put a park and ride on the other side of Stock. Have a people's vote/referendum on their specific district. An up to date Housing Needs survey should be undertaken and the results used to determine the actual number of new homes that are required and the tenure types. Reduce the number of homes to the Regulation 18 level. 	from the local waiting lists is not a matter for the Local Plan. Empty properties for reuse were considered as part of the South Essex Strategic Housing Market Assessment (SHMA), but levels arising were accounted through market churn figures, as opposed to indicating an untapped source of supply. The Council initially sought to base its Spatial Strategy on a proportionate approach around the main settlements, however, account for other evidence including environmental, transport, sustainability and land availability it has had to make informed judgements on when it has been more justified and effective to deviate from this to achieve more sustainable development outcomes. The Council has produced a Brownfield Land Register and, where possible, brownfield sites are being proposed for

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		development, as set out within the Council's evidence base.
		Infrastructure capacity has been reviewed and through phased implementation and upgrades, the Plan intends to manage housing growth.
		An Infrastructure Review and Infrastructure Delivery Plan have been prepared working with infrastructure providers and commissioners including highways, public transport, education, healthcare, emergency services, flood mitigation and utilities to determine current capacity and future needs. This collective work has informed the Local Plan.
		The Council undertook an Archaeological Asset Impact Assessment for Potential Growth Locations in 2016 and carried out site specific updates as site selection options evolved. Criteria have been included in site allocation policies should specific archaeological assessments be required

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		and Policy HE4 sets out how proposals that could affect archaeological remains should be treated.
		Not building in the Green Belt is not supported by evidence given needs and lack of urban capacity and brownfield sites; the Council considers there to be exceptional circumstances.
		Modifying the Plan to not build in the Green Belt is not supported by evidence given needs and lack of urban capacity and brownfield sites and a review of Green Belt; the Council considers there to be exceptional circumstances.
		Environmental mitigation to counter the impact of development has been included in policies to support the growth proposed.
		The Highways Authority has not identified a need for a relief route to be created in the East of Billericay.

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		The Local Plan already includes a proposal for a relief route within H17 in Billericay which would aid traffic flows around Laindon Road and Sun Corner. The Highway Authority has not identified any need for bypasses.
		The transport policies in the Local Plan aim to increase the level of off-street parking at the station and in the town centre should opportunities present themselves. The Basildon Borough Local Plan Transport and Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes including the Billericay Relief Road, which are proven to alleviate the impact of growth on the highway network in this part of the Borough.
		Changing the location of sites so they are more equitable to south Billericay is against evidence as to where the better

Section/Para/ Policy	Summary of Responses	Council's response
		sites are located, including a Green Belt Review and Landscape Study.
		The Brentwood and Basildon Clinical Commissioning Group has not specifically sought for a new health centre to be provided in Great Burstead. Policy H20 however recognises that sites will impact on demand for health services and contributions are already a requirement of the development proposal. Infrastructure capacity has been reviewed and through phased implementation and upgrades the Plan intends to limit the impact from housing growth.
		Network Rail has not identified the need for a new railway station between Billericay and Shenfield following engagement about the Local Plan and its impact on the rail network.
		Essex Police have not indicated they need to reinstate the police station following engagement about the Local Plan and its impact on local services.

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		An Infrastructure Delivery Plan (IDP) has already been prepared, alongside a Green Belt Topic Paper. An Air Quality Topic Paper was also prepared. All were available during the Regulation 19 Revised Publication Local Plan consultation period.
		In respects of there being a lack of new job provision in Billericay, the Plan has been based on evidence, as to where new employment areas could be located sustainably. New employment provision for the Borough is focussed on the established A127 Enterprise corridor in nearby Basildon & Laindon.
		Policy T3 includes details relating to necessary improvements to footpaths, cycling and bridleway infrastructure. Policy T4 includes details relating to necessary public transport infrastructure and services improvements.
		The Plan's evidence identified safety concerns regarding how to access the

Section/Para/ Policy	Summary of Responses	Council's response
		Hovefields and Honiley Neighbourhood Area, and how to integrate long-term proposals for improving the A127, which would need to be resolved, prior to any allocation of this area as part of the Broad Location, or South Essex JSP.
		A park and ride in the proposed location in Stock, would be a matter for the Highway Authority's Local Transport Plan and Chelmsford City Council.
		Referendums are only required for Neighbourhood Plans, not Local Plans.
		The requirements of Regulation 18 have been met. Options for meeting housing need have been fully explored.
		There is no policy in the Plan proposing specific development on the Radford Crescent Car Park in Billericay. The proposal is to amend the boundary of the Radford Way Employment Area to include the car park. Sufficient protection will be provided by Policy T9 Parking Provision within Employment Areas -

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		Criterion 2 should a development proposal be received, which would seek for existing provision to be relocated. Removing the proposed boundary change will leave the car park as an Area of No Notation, where it will not be protected by policy T9. Options for new settlements in the Borough do not deliver the development required against needs on their own and in any case the size of the Borough means that new settlement options would be limited to creating new villages from scratch, or expanding existing villages, which would not necessarily be more sustainable than expanding the existing towns where more services and facilities already exist, albeit they may need investment to improve their capacity. Creating New Towns in the rest of Essex/ other parts of the country is not a matter for the Basildon Borough Local Plan, rather it is a matter for other local planning authorities' Local Plans and any Joint Strategic Plans underway.

Section/Para/ Policy	Summary of Responses	Council's response
		There have been calls for the Plan to be abandoned and recommenced are not in accordance with the Council's legal obligations or statutory timetable for preparing the Local Plan.
Paragraphs 6.37 - 6.40 Policy SD2: Settlement Hierarchy and the Distribution of Growth	 Support: Support the designation of Ramsden Bellhouse as a Neighbourhood Planning Area. (Cllr Allen RPLP/812). Objection: Object to paragraph 6.37 as not clear enough as to why Plan has made certain judgements about coalescence and how to mitigate it. (CODE Development Planners Ltd RPLP/1935). Non Green Belt sites appear to have been rejected over Green Belt sites. (Billericay District Residents Association RPLP/1622). SD3 awards minimum scale of growth to Neighbourhood Plan without defining required infrastructure. (Essex County Council RPLP/1698). This should be defined and be consistent with infrastructure already identified in E6, T2 and H11 and informed by highway and transport evidence and East Basildon High Level Development Framework. (Essex County Council RPLP/1698). Significant growth in Ramsden Bellhouse and Crays Hill not appropriate as villages away from Strategic Road Network. 	The Council accepts wording changes to paragraph 6.37 will provide additional clarity on this cross-boundary matter. The Council considers that through the Plan, its Sustainability Appraisal and its evidence, including the Green Belt Review, Green Belt Topic Paper and Housing Options Topic Paper has justified why the release of Green Belt land to meet some of the development needs in the Borough is necessary and why exceptional circumstances exist. The final selection of housing sites allocated within the Revised Publication Local Plan have been informed by an extensive evidence base, including the Housing Options Topic Paper. The Housing Options Topic Paper draws together evidence related to housing capacity and constraints on growth, and gives an explanation on how the Council

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	 Significant growth in Billericay not appropriate as away from Strategic Road Network. Modification/s requested: Reword paragraph 6.37 as suggested. (CODE Development Planners Ltd RPLP/1935). Provide detail relating to Green Belt review and site selection. (Billericay District Residents Association RPLP/1622). Change paragraph 6.39 to clarify and identify the necessary supporting infrastructure requirements and associated BLP evidence base required for the provision of 1,350 new homes in the Neighbourhood Plan Area. (Essex County Council RPLP/1698). Give consideration to the proximity of strategic road network to development locations. 	has considered all the housing site options, using the extensive evidence base available to inform their decisions. A Housing Omission Sites Topic Paper has also been prepared to give further clarification on the borough's housing supply position. The Council accepts that SD3 lacks supplementary links about strategic infrastructure needs which is relevant to the Bowers Gifford and North Benfleet Neighbourhood Area and agrees wording needs to be inserted into the paragraph 6.39 which clarifies this informed by evidence, making it consistent with Policy E6, Policy T2 and Policy H11. The Council considers SD2 has distributed sustainable quantum's of growth to all serviced settlements within the Borough's Settlement Hierarchy. Infrastructure evidence has been prepared with Highway Authority, public transport commissioners and service providers to inform Local Plan and

Section/Para/ Policy	Summary of Responses	Council's response
		Infrastructure Delivery Plan to help bring growth and infrastructure forward.
Paragraphs 6.42 – 6.46 Policy SD2: Settlement Hierarchy and the Distribution of Growth	 Support: Support for the designation of land to the South of Crays Hill as a Broad Location due to current environmental quality and living conditions. (Cllr Allen RPLP/810). Support for approach to broad locations which is focused on review for the first local plan review. This provides time to further develop proposals for improvements to the A127 as part of the Joint Strategic Plan. (Essex County Council RPLP/1699). Modification/s requested: Allocate land to the South of Crays Hill for development. (Cllr Allen RPLP/810). 	The Council has designated the land south of Crays Hill as a Broad Location, which it considers to be justified based on the evidence available. Paragraph 6.45 recognises that there are however a number of constraints which prevent it from being allocated in this Plan, but which will be examined through the South Essex Joint Strategic Plan, which could enable it to be brought forward in the future.
Policy SD2: Settlement Hierarchy and the Distribution of Growth	 Support: Approach broadly supported by Rochford District Council. (Rochford District Council RPLP/1648). Support for the designation of land to the South of Crays Hill as a Broad Location. (Cllr Sargent RPLP/1572). Support for Wickford being identified as a broad location for potential housing growth. (Martin Grant Homes (UK) Ltd RPLP/1776). Support for level of growth proposed for Wickford. (Martin Grant Homes (UK) Ltd RPLP/1776). 	The Council accepts that SD2 lacks supplementary links about strategic infrastructure needs which is relevant to the Bowers Gifford and North Benfleet Neighbourhood Area and agrees wording needs to be inserted into the paragraph 6.39 which clarifies this informed by evidence, making it consistent with Policy E6, Policy T2 and Policy H11.

Section/Para/ Policy	Summary of Responses	Council's response
	 Support for Basildon's position as the principle settlement for growth within the settlement hierarchy. (Croudace Strategic RPLP/1889, Estates and Agency Holdings Limited RPLP/2107, Estate and Agency Strategic Land LLP RPLP/2129). Supports the inclusion of Noak Bridge as part of the Basildon Urban area. (Croudace Strategic RPLP/1889). Support for allocation of H100 as part of growth for the Basildon Urban Area. (Croudace Strategic RPLP/1889). Rationale for rejection certain growth locations has been unsound. (Persimmon Homes RPLP/1955). Support for Billericay being identified as a broad location for potential housing growth. (BDW Eastern Counties RPLP/2189). Support for allocation of H20 as part of growth for Billericay. (BDW Eastern Counties RPLP/2189). Plan sensibly allocates based on size of settlement. (Persimmon Homes RPLP/1955). Objection: Policy SD2 and SD3 should define the infrastructure required to deliver the level of growth. (Essex County Council RPLP/1701). Policy should clarify the requirements, delivery and infrastructure mechanisms to support growth in this location accounting for evidence. (Essex County Council RPLP/1701). 	Policy SD1, supported by SD2, SD3 and SD4 establishes the strategic approach to development in the Borough. It sets a housing and employment land target and in recognition that not all development can take place at the same time, establishes a staggered minimum housing delivery target until 2034. It acknowledges that having accounted for development that could be reasonably accommodated in the urban area that the Green Belt has been reviewed to accommodate the majority of the remaining growth, whilst continuing to protect the remaining Green Belt from urban sprawl, particularly those areas of higher landscape, ecological or flood risk value. It appreciates that in order to realise the benefits of economic growth, new jobs will need to be focussed on particular sectors and that development will need to be phased to enable the provision of services and infrastructure alongside development. The Borough's housing target was determined based on a Strategic Housing Market Assessment which

Section/Para/ Policy	Summary of Responses	Council's response
	 Thurrock objects to SD2 as fails to address OAN and does not supply enough sites to meet the need. (Thurrock Borough Council RPLP/849). Land to West of Basildon could be allocated whilst still retaining a gap of Green Belt between revised settlement edge of Basildon and West Horndon. (Persimmon Homes RPLP/1955). The Government housing targets are questionable. Excessive number of homes for Billericay. Understands the need for housing need in Borough, but not specifically in Billericay. Plan should meet its OAN. Not driven by need by to give developers profits and Council tax. Basildon a better location for new housing sites as it can absorb development as it's a new town. Green areas are valued and essential to health and welfare of Billericay residents. New homes will be detrimental. South Essex is already extremely overcrowded with the overspill from the capital. Housing growth needs revising due to Brexit. Disagrees with Spatial Strategy as started to try and be proportionate, but has not resulted in that. Housing should only be provided for local need. Concerns about affordable housing. 	reviewed needs for new homes taking into account a range of socio-economic factors, including the level of empty homes, as guided by the NPPF and Planning Practice Guidance. The NPPF now stipulates that the Standard Methodology, as described in Planning Practice Guidance must now be used as the starting point, which does not correlate with local needs only. Only catering for local need, by reducing the amount of housing will therefore be against national policy and the Plan's evidence. Options for meeting housing need have been fully explored. Basildon (including Laindon, Pitsea and Noak Bridge) has been evaluated in the same way as other locations to determine if it is suitable to accommodate further growth and it is identified by Policy SD2 as suitable for 8,747 new homes and 91ha of employment land. Any impacts of Brexit are not fully understood from a planning perspective

Section/Para/ Policy	Summary of Responses	Council's response
	 New Billericay homes will all be executive homes and not affordable. Billericay currently has 1,865 homes for sale and 385 for rent so there is not the need for more. Provide better public transport, and walking and cycling routes. Concerns about traffic and congestion. The relief road will not relieve congestion in Billericay. Local roads can't handle increase in traffic. Lack of thought to Billericay road layout. Potash Road is far too narrow to accommodate the expected increase in vehicle traffic. Benefits of the relief road are unclear. All the south / north traffic will be channelled into Frithwood Lane. This road is currently single track between Frithwood Close and Scrub Rise. To upgrade it to be suitable for heavy traffic including commercial vehicles would involve removing most of the front gardens and off street parking areas on the drives of the existing houses H19 Southend Road as this is a main road into and out of Billericay and already sees a significant amount of traffic and traffic congestion. Development at H17a will cause gridlock. Concern about congestion at Tye Common Road. Stock Road has become a rat run. There are number of roads in Billericay which cannot cope with an increase in traffic. 	and as such it would not be justified, and therefore sound, to make any policy decisions in the Local Plan based on this matter. Billericay (including Little Burstead and Great Burstead & South Green), as a part of the Basildon Borough, has been reviewed as a settlement and appraised through a range of evidence including historic, built environment, Green belt, landscape, ecology, housing, economic development and land availability. The Council has determined that exceptional circumstances apply and Green Belt boundaries can be amended. This has helped determine how much growth the Council considers can be accommodated across the Borough and how this can be done sustainably through appropriate mitigation including specific design and character criteria, protection policies for natural assets such as ancient woodland, provision of new/expanded community facilities, infrastructure and open spaces and landscaping, etc. This development

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	 Billericay High Street is not wide enough to cope with additional traffic. Concern about highway safety. Plan does not explore the alternatives of building close to the A127 and Council should reconsider this given Lower Thames Crossing route and Crossrail. Should explore doing something jointly with Brentwood - to build north of the A127 around Dunton. A127 and A12 already gridlocked. The H19 sites will cause traffic issues with Greens Farm Lane and Outwood Common road, particularly with traffic joining the A129. Cross boundary development, appears to have been too quickly dismissed. Concerned about overcrowding commuter routes. Billericay is a historic town and cannot cope with the proposed population increase. Insufficient infrastructure. Strategic review of infrastructure missing, Plan has just focussed on local improvements. Infrastructure cannot cope now and additional infrastructure will not help everywhere. More schools (primary and secondary), more GP's, Fire and Police stations needed. Insufficient parking provision. 	locations determined in Billericay are considered to be sustainable and will help the town evolve, improving the availability and choice of housing across tenures and sizes to help meet different needs, supported by necessary infrastructure. The presence of houses for sale in Billericay, is not an indicator that less homes are needed to be planned for in the future. The Council considers that through the Plan, its Sustainability Appraisal and its evidence, including the Green Belt Review, Green Belt Topic Paper and Housing Options Topic Paper has justified why the release of Green Belt land to meet some of the development needs in the Borough is necessary and why exceptional circumstances exist. The final selection of housing sites allocated within the Revised Publication Local Plan have been informed by an extensive evidence base, including the Housing Options Topic Paper. The Housing Options Topic Paper draws together evidence related to housing

Section/Para/ Policy	Summary of Responses	Council's response
	 Objects to loss of Radford Way car park. Provide long stay car parking Billericay town. Parking is expensive in Billericay. Sustainable access to Billericay required from new housing. High Level Development Framework prepared without reference to residents and proposed more homes on Green Belt and not consulted on for Regulation 18. Still no details on supporting infrastructure. Insufficient GP/health provision. No expansion possibilities at the hospital. Concern about school capacity. Lack of employment. Lack of employment proposed in Billericay. Objects to development on Green Belt. Must be public consensus to lose Green Belt which there is not. Development in Green Belt against stopping urban sprawl. Loss of Green Belt will change outlook from town. Green Belts are an asset to local areas and can be used for things such as food production. Green Belt loss at H17c and H17d will affect habitat for green woodpeckers and owls. H17 is to be too densely developed compared to surroundings. This will mean development not in keeping and out of character. H17 is in an area with no infrastructure to support it. 	capacity and constraints on growth, and gives an explanation on how the Council has considered all the housing site options, using the extensive evidence base available to inform their decisions. A Housing Omission Sites Topic Paper has also been prepared to give further clarification on the borough's housing supply position. The Plan sets new policies to encourage a range of house types, tenures and sizes to be provided with specific targets for housing mix, specialist accommodation for older people, adaptable homes and space standards. In addition, the Plan seeks to maximise the productivity of the existing housing stock, including bringing empty homes back into use. Other highway improvements needed in Billericay have been informed by the Transport and Highway Impact Assessment. This identifies that junction improvements are required at B1007 High Street / Norsey Road / Western

Section/Para/ Policy	Summary of Responses	Council's response
	 No mention of new trees that will need to be planted to offset the loss of Green Belt to address pollution. Maintenance of soft landscaping does not occur now. Green areas are valued and essential to health and welfare of Billericay residents. Consider impacts on air quality. Impact on residents from noise pollution. Water pressure very low in development areas. Will put immense strain on the local infrastructure, have ecological damage and will be unsustainable without massive infrastructure investment. Object to loss of Green Belt. No exceptional circumstances given for loss of Green Belt. Too much housing on Green Belt. Detrimental to current and future generations. Loss of separation between Billericay and Hutton due to H17a. Green Belt being used as it is more attractive. Will destroy Ancient Woodland. Green Belt use not justified and should be used as a constraint to growth instead. No additional large recreation areas proposed. Against the relocation of sports facilities in Billericay. Relocation of sports facilities will be costly. Green areas are valued and essential to health and welfare of Billericay residents. Loss of countryside will increase mental health issues. 	Road, London Road / High Street / Sun Street, A129 Southend Rd / Hickstars Lane, and includes two-way implementation on southern Laindon Road. All junction improvements and the relief road are set out in policy as being a requirement of any development proposal demonstrating the Council's commitment to their delivery. Further improvements could be brought forward by the planning application process, following engagement with the Highways Authority. Comments have been received in relation to railway capacity. Proposed increases to railway capacity are set out in the Council's Infrastructure Delivery Plan. This includes, amongst other things notable journey time improvements and 55% more seats in the morning peak across the Liverpool Street line as part of the £1.4bn investment by the current franchise holder Abellio Greater Anglia. The Local Plan cannot influence train fares.

Section/Para/ Policy	Summary of Responses	Council's response
	 Green Buffers will be eroded. Plan has not looked at adequate alternatives to Green Belt. Brownfield land should be built on first. Only 229 brownfield sites have been used since 2014. Concern regarding public transport. The plan will have a negative impact on the wellbeing of residents. Concern about impact on the environment. Elevated position of Mill Meadows Nature Reserve not considered and will have impact on skyline. Lack of consultation. Lack of user friendly maps. The consultation was complex / consultation documents were difficult to understand. The consultation was biased and tailored towards an on-line audience. Housing allocation references have changed several times since 2012. Missing studies. Council has disproportionate engagement with house builders. Previous consultation comments were not taken into account through the Local Plan process. Previous consultation responses not available on the website for public viewing. The Council should carry out another Regulation 18 consultation. 	Relief Road is needed to contribute towards improvements to highway capacity in Billericay and mitigate impacts of development. It is not proposed to dissect Frithwood Ancient Woodland. Its benefits, impact, design at existing inter-sections and cost estimates are set out in the South West Billericay High Level Development Framework and Transport and Highway Impact Assessment. The Relief Road within H17 in Billericay also would aid traffic flows around Laindon Road and Sun Corner. Congestion has been a consideration in the development of the proposals across the Borough and the Council has worked with the Highways Authority to validate the baseline information used in modelling and identify ways the local highway network can be improved, as well as public transport providers to identify ways the Plan can support modal shift, to reduce road congestion and be compatible with train operators and

Section/Para/ Policy	Summary of Responses	Council's response
	 In 2016, community rejected plans but now number has increased. Scrap the plan and start again without an objective party. Not sustainable approach. Billericay and Crays Hill unfairly affected in terms of character with no benefits. Character will change forever that Design Statement seeks to maintain. Seems to all be based on Council getting more Council Tax in higher priced areas. Billericay has suffered gas and water leaks. Loss of agricultural land against Government policy. Detrimental impact on wildlife. Site H19a and H19b Greens Farm Lane: Would significantly narrow the wildlife corridor between Mill Meadows and the wider countryside. Impact on horses and cattle as walkers will disturb them. Some sites are elevated and will have obvious and detrimental impact. Concern about increase in use of railway. New homes will be for commuters and so increase burden on station. Railway is overcrowded. Significant improvements to dated railway station and train service are needed. 	Network Rail's plans to invest in stations and services in the future. Infrastructure capacity has been reviewed and through phased implementation and upgrades, the Plan intends to manage housing growth. An Infrastructure Review and Infrastructure Delivery Plan have been prepared working with infrastructure providers and commissioners including highways, public transport, education, healthcare, emergency services, flood mitigation and utilities to determine current capacity and future needs. This collective work has informed the Local Plan. The Green Belt Study which has informed the Plan has considered strategic gaps and the purpose of the Green Belt to prevent coalescence of settlements. The Local Plan has been informed by up-to-date evidence. The agricultural land in Basildon is Grade 3. This means that it is not the best and most versatile

Section/Para/ Policy	Summary of Responses	Council's response
	 The car parking, cycle and motorcycling parking at Billericay station is already full. Lots of homes currently for sale. Concern for resident's health and wellbeing. Concern about flood risk. Concern about decline of high streets in favour of larger shopping centres with plenty of free parking available. No plans to regenerate Billericay High Street. Concern about lack of retail provision. Lack of planned new leisure and retail facilities. People will no longer want to live in Billericay if all the proposed development goes ahead. Billericay has grown too much in last 20 years. Developers profit being put first. Impact of Lower Thames Crossing not considered. Neighbourhood Plans encouraged by Government, but Council has refused 3 times to include Hovefields and Honiley Neighbourhood Plan in Local Plan. No credible justification for excluding a housing target for this Neighbourhood and including others, when identifying it as a Broad Location. Area includes unauthorised Traveller development and community are looking to Neighbourhood Plan to address. Community should be allowed to take control. Concerns about development impact from neighbouring Brentwood and Southend. 	agricultural land and therefore the NPPF does not offer protection to this grade of agricultural land. A Policy NE9 has been included however, to ensure that any further reassessments of this can be picked-up by the development management process. The Plan's HC1 sets out a strategy to ensure development can contribute to health and well-being. The Highway Authority have advised the Council on where sites allocated for development must safely connection into the existing highway network. The Local Plan's Transport and Highways Impact Assessment and Mitigation Modelling has also considered safe and sustainable access for all users. Engagement with Brentwood Borough Council has not identified any potential for joint developments, north of the A127, around Dunton. The Council engaged with the Emergency Services to determine the

Section/Para/ Policy	Summary of Responses	Council's response
	 CIL benefits are increased due to a premium in regard to building in Billericay as opposed to elsewhere in the borough. However, those levies would be spread across the borough. The CIL payment and allocation structure also needs to be identified prior to the construction of the plan in a way that does not exclude parts of the borough that may be deemed to be not as profitable for the council or developers. Inconsistencies between the proposed housing density of 35duph, and the actual density in allocations H16, H17, H18, H19 and H20. Other comment/s: Council will continue to work positively with BBC and partners to effectively plan for infrastructure to support growth through JSP and Duty to Cooperate. (Rochford District Council RPLP/1648). No specific comments to make on policies but would expect any mitigation identified through the SA as necessary to address impacts on biodiversity to be secured by relevant policies including funding mechanisms. (Natural England RPLP/2544). Suggested wording changes to policy SD2. (Countryside Properties (UK) Ltd RPLP/1317, Gleeson Developments/Avant Homes RPLP/1346, Essex County Council RPLP/1701). 	extent to which the Local Plan's proposed growth could impact on their needs in the future, including whether those services were looking for additional operational bases and how whether, through their own funding mechanisms, they would seek to finance such investment. Comments have also been received in relation to car parking capacity within Billericay High Street and at the railway station. The Essex Parking Standards - Design & Good Practice (2009) is considered appropriate in the Borough because it promotes minimum requirements for parking for residential developments, but maximum requirements for parking in non-residential areas which is consistent with the NPPF, supporting sustainable travel modes. However, the Basildon Borough Vehicle Parking Capacity and Intervention Study 2017 recognises that there is parking congestion in these locations and therefore the policies in this Plan protect town centre and station

Section/Para/ Policy	Summary of Responses	Council's response
	 Desire for the Land South of Crays Hill to come forward sooner rather than later in order to improve the quality of the environment and living conditions. (Cllr Sargent RPLP/1572). Note Broad Locations and their principles. (Historic England RPLP/2143). South of Crays Hill and South of Wickford both have Listed Buildings the settings of which will need to be preserved and enhanced. (Historic England RPLP/2143). NHS would only look to increase the capacity within existing health care services already accessed by the Ramsden Bellhouse residents, due to the low level of growth proposed in the area (NHS England - Essex Area Team RPLP/2501). Concerns about Cllr comments. Modification/s requested: Suggested wording changes to policy SD2. (Countryside Properties (UK) Ltd RPLP/1317, Gleeson Developments/Avant Homes RPLP/1346, Essex County Council RPLP/1701). In policy SD2 recognise natural and historical constraints. (Historic England RPLP/2143). Distribute growth proportionately across the Borough. Reduce the number of houses proposed for Billericay. Do not build on Green Belt in Billericay. Objects to development on Green Belt. Build on brownfield land first. Provide sufficient infrastructure. 	car parking in such instances and will support The Plan considered how densities on greenfield sites should be set on a site by site basis, drawing from landscape evidence, with adjustments as necessary to account for proximity to railway stations and surrounding residential areas if relevant. The Plan sets out policies to ensure development can contribute to health and well-being. There have been calls for the Plan to be abandoned and recommenced, however, this is not in accordance with the Council's legal obligations or statutory timetable for preparing the Local Plan. Policy NE1 sets out the overarching framework for how Green Infrastructure will be managed by the Plan, including how access to the countryside will be managed. Policies NE4 and NE4 consider development impacts on ecology and biodiversity, as well as landscape and landscape features.

Section/Para/ Policy	Summary of Responses	Council's response
	 Consider impacts on school capacity. Consider impacts on GP/health provision. Road improvements required. Provide sufficient parking. Consider needs for water, drainage and power supplies. Provide new bridge over railway at Mountnessing Road. Scrap the plan and start again without an objective party. Ensure retail development is proposed. Ensure green spaces remain. Carry out sustainability analysis. Carry out agricultural grade land testing on all sites to avoid using the best farmland. Give reason for the exception circumstances which warrant development on Green Belt. Questions the Government housing targets. Reduce the number of homes built on Green Belt, particularly in the South Green area where the infrastructure will be difficult to improve. Avoid building on the higher ground to avoid the developments being unsightly. New Towns should be created in Essex instead, rather than extending existing towns. References in Policies SD2 to land provision, housing sites and the housing delivery target would need to be amended accordingly to reflect the inclusion of additional or enlarged sites in the local plan. 	An Air Quality Topic paper was prepared to inform the Local Plan, which has also been informed by the UK Air Quality Plan which references the A127 in respects of Nitrogen Dioxide levels. This is set out in Chapter 16 Noise pollution has been considered as part of the Local Plan's development. Additional recreation areas have been proposed in the Local Plan, as an accompaniment to the major housing allocations of H5-20. The relocation of Billericay Cricket and Tennis Clubs are necessary to enable the development of the Billericay Relief Road and the housing allocation H17. The Council has engaged with the developers, the clubs and Sport England, informed by the South West Billericay High Level Development Framework to determining a suitable policy that will enable the relocation of the clubs.

Section/Para/ Policy	Summary of Responses	Council's response
	 Include more self-build sites. Relief road is not required. Build a new train station. Build local shops on new estates. Build a new full bypass road around the whole of Billericay to take traffic from A12 to Basildon around the town not through it and not through and woodland. Any new homes to be built with PV, renewables, rainwater storage tanks, and be zero carbon. New estates if built to incorporate extensive soft landscaping and hundreds of trees. Revisit options with Brentwood to develop a conurbation better sited within easy access of the A127. Build additional buildings for police, NHS and fire services. A better relationship between Basildon Council and groups in Billericay so we as a community can actively come to a sound local plan that will work for the whole borough. There should be an independent enquiry into the loss of green belt. A simpler consultation response form should be sent to everyone on the Electoral Roll. All consultation information should be sent by post to all consultees. Consultation materials should be made available over the phone. Provide sufficient numbers of jobs within Billericay. 	The Council has produced a Brownfield Land Register and, where possible, brownfield sites are being proposed to contribute to the future land supply. The concern about the development of various sites and the impact this would cause to wildlife, views and the landscape/ skyline has been mitigated by the Plan. It has used independent ecology and landscape studies to inform site selection and specific criteria to retain natural features, public rights of way, etc. to manage and mitigate impact. There have been demands for further consultation and for the Council to repeat a Regulation 18 consultation given the changes that have been incorporated into the Revised Publication Local Plan 2018 that were not in the Draft Local Plan 2016. The Council does not consider this necessary as the Plan has been prepared in accordance with the Regulations, the Council's Statement of Community Involvement and to delay the Plan, to carry out further consultation,

Section/Para/ Policy	Summary of Responses	Council's response
	 Remove Billericay from the plan. Withdraw the plan and produce a version that has the support of residents. Withdraw those parts of the plan that differ from the Draft Local Plan consultation in 2016. Amend housing density for allocations H16, H17, H18, H19 and H20 to reflect the declared density of 35duph. 	would not be in accordance with its statutory Local Development Scheme 2018-2020. It is necessary for the Council to engage with anyone who has an interest in the Basildon Borough, including landowners, or housebuilders. Previous consultation responses have been taken into account by the Council as set out in the relevant Statements of Consultation, which were available for the duration of consultation. Anyone could access what they had previously submitted to the Council, via their consultation portal account. The Council anticipated that the Regulation 19 Revised Publication Local Plan would be regarded as more complex, given the technical nature of how responses must be made against the legal and soundness tests. A summary booklet was prepared to help get across the main proposals in the Plan. An online Google™ map website

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		was advertised to help people point land they may have an interest in that could be affected and how. Specific bookable Advice Sessions were held during selected afternoons, evenings and Saturdays during the consultation to ensure people could access professional support should they feel they needed it, in addition to phone and email support that was also provided. The consultation was not biased towards an online audience and people could participate using the consultation booklets should they wish and access all hard copy reports in the main Borough libraries.
		The Plan includes a specific policy for Billericay Town Centre's enhancement to support its vitality and offer greater consumer choice where opportunities arise. It will support opportunities to enhance the public realm, including new public spaces and managed parking spaces, as well as ensuring works carried out to buildings/ land respect the historic character and seek enhancements where possible.

Section/Para/ Policy	Summary of Responses	Council's response
		The Plan sets out a Retail and Commercial Leisure Strategy in Policy R1 to establish the retail hierarchy and focus for growth in the Borough's town centres.
		Allowances for developer profit have been taken into account as part of the Local Plan's Viability Assessment, but these allowances are considered to be fair and are not driving the land use allocations in the Local Plan.
		The Lower Thames Crossing has been considered as part of the Plan's preparation and the Council is a key partner in Highway England's Stakeholder Advisory Panel, alongside Essex County Council as the Highway Authority. Policy T1 – Transport Strategy establishes that the Plan will work with Essex County Council, Highways
		England and neighbouring authorities to ensure the impact and opportunities arising from the crossing are understood and ensure it integrates effectively into

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		the South Essex Strategic Road Network.
		The Plan's evidence identified safety concerns regarding how to access the Hovefields and Honiley Neighbourhood Area and how to integrate long-term proposals for improving the A127, which would need to be resolved, prior to any allocation of this area as part of the Broad Location, or South Essex JSP. Paragraph 6.45 recognises that there are however a number of constraints which prevent it from being allocated in this Plan, but which will be examined through the South Essex Joint Strategic Plan, which could enable it to be brought forward in the future.
		Duty to Cooperate engagement has taken place during the Plan's preparation to ensure the plans of other local planning authorities are considered when developing the Basildon Borough Local Plan. Any issues previously identified have been incorporated in evidence testing or specific policies as necessary.

Section/Para/ Policy	Summary of Responses	Council's response
		CIL is being prepared in tandem to the Local Plan to ensure that development adequately contributes to the costs of providing infrastructure.
		The Council initially sought to base its Spatial Strategy on a proportionate approach around the main settlements, however, account for other evidence including environmental, transport, sustainability and land availability it has had to make informed judgements on when it has been more justified and effective to deviate from this to achieve more sustainable development outcomes.
		There are infrastructure proposals and policies to mitigate the impact of development in Billericay and strengthen the environmental assets to support the growth proposed.
		Infrastructure capacity has been reviewed by the Council and through phased implementation and upgrades

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		the Plan intends to limit the impact from housing growth.
		The modification of not building in the Green Belt is not supported by evidence given needs and lack of urban capacity. There are infrastructure proposals and policies to mitigate the impact of development in Billericay to support the growth proposed.
		The education authority have been consulted on the Local Plan and Infrastructure Development Plan's development and have identified where new provision or expansion to existing schools is required to meet the arising need and this is set out within the site allocation policies.
		The development of the Infrastructure Delivery Plan has engaged with healthcare commissioners and service providers has occurred during preparation of Local Plan.

Section/Para/ Policy	Summary of Responses	Council's response
		Scrapping the Plan is against the Council's published timetable, which the Government expects will be adhered to.
		A review of Infrastructure and a Sustainability Appraisal have been prepared to inform the Local Plan and its proposals.
		Evidence indicates that there is a scale of need that cannot be accommodated in the urban areas, due to a lack of urban capacity and brownfield sites; the Council considers there to be exceptional circumstances to therefore release the Green Belt.
		Options for new settlements in the Borough do not deliver the development required against needs on their own and in any case the size of the Borough means that new settlement options would be limited to creating new villages from scratch, or expanding existing villages, which would not necessarily be more sustainable than expanding the existing towns where more services and

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		facilities already exist, albeit they may need investment to improve their capacity. Creating New Towns in the rest of Essex/ other parts of the country is not a matter for the Basildon Borough Local Plan, rather it is a matter for other local planning authorities' Local Plans and any Joint Strategic Plans underway. The Council accept that a modification to
		SD2 will help clarify that growth in any neighbourhood planning area should also include necessary links and connections for highways and other infrastructure upgrades to ensure tie into strategic infrastructure projects.
		The Council accepts that a modification to Paragraph 6.45 can ensure that it recognises future reviews of Broad Locations include impact on historical designations.
		Policy HC1 already addresses health and well-being in the borough.

Section/Para/ Policy	Summary of Responses	Council's response
		The Local Plan and Green Belt boundary amendments as part of it will be subject to statutory Examination in Public in accordance with Regulation 24 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
		Previous versions of the Plan set out initial drafts of a new Local Plan for Basildon Borough. As such, some text will have been updated within the finalised version of the Local Plan.
		The Local Plan will be subject to statutory Examination in Public in accordance with Regulation 24 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
		The Council has minimum requirements (set out in the relevant Regulations) to meet for notifying the public and statutory consultees of the consultation on Local Plan documents. There is no statutory requirement to write directly to every single household within the borough, as this is often cost and labour

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		intensive, and also it is expected that residents would keep abreast of local news and activities as part of their civic responsibility. The Council has therefore used a number of consultation methods to notify the public and statutory consultees of the consultation in line with its adopted Statement of Community Involvement. It is considered that the methods used were sufficient to reach a wide range of demographics within the Borough.
		Previous consultation responses have been considered throughout the local plan process and are documented within the associated statement of consultation.
		The Local Plan has been informed by up-to-date evidence.
		The Council accepts –that housing densities on allocations H16, H17, H18, H19 and H20 need to be amended to ensure for accuracy and consistency.

Section/Para/ Policy	Summary of Responses	Council's response
Paragraphs 6.61 - 6.62 Policy SD3: Designated Neighbourhood Areas	 Other comment/s: Infrastructure for 1,350 new homes in Bowers Gifford Neighbourhood Plan not identified alongside other strategic matters. (Essex County Council RPLP/1703). Would like to understand the implications of the country park proposed in the Bowers Gifford and North Benfleet Neighbourhood Plan. Modification/s requested: Change Paragraphs 6.61 and 6.62 to clarify and identify the necessary associated infrastructure, phasing and contributions required to support the provision of 1,350 new homes. (Essex County Council RPLP/1703). 	The Council recognises that strategic infrastructure will be necessary to deliver growth options in the Bowers Gifford and North Benfleet Neighbourhood Plan and agrees this should be referenced in the supporting text of Policy SD3. It is not for the Local Plan to define the Country Park proposals in the Bowers Gifford and North Benfleet Neighbourhood Plan. The Council accepts that it is necessary to amend paragraph 6.61 to set out the necessary supporting strategic infrastructure for Bowers Gifford Neighbourhood Area.
Policy SD3: Designated Neighbourhood Areas	 Support: Support the designation of Ramsden Bellhouse as a Neighbourhood Planning Area. (Cllr Sargent RPLP/745, New Hall Properties (Eastern) Ltd RPLP/1513). Support the designation of Noak Bridge as a Neighbourhood Planning Area. (Cllr Allen RPLP/934). Support for policy SD3 as it relates to the Bowers Gifford and North Benfleet Neighbourhood Plan area. 	

Section/Para/ Policy	Summary of Responses	Council's response
	 Support the requirement for appropriate provision / reprovision for the existing travelling community within the borough's Neighbourhood Plans. (Rochford District Council RPLP/1649). Objection: Objects to delegation of identification of sites and amendment of the Green Belt boundary to the Neighbourhood Plan. (Halsbury Homes Ltd RPLP/1392). Considers that the plan should revert to the proposals presented in the March 2018 Publication Local Plan. (Halsbury Homes Ltd RPLP/1392). Achieving 39 homes in Ramsden Bellhouse will mean they will need to be squeezed in to frontage plots. Reducing the number to 20-25 would enable the village visual character and flood defences to be maintained. Seriously question the appropriateness of delegating a review of Green Belt boundaries to Neighbourhood Plans. (Millwood Designer Homes Ltd RPLP/1820). Delegation for Bowers Gifford and North Benfleet could critically affect delivery of new homes in the Borough and considers additional allocations are necessary. (Millwood Designer Homes Ltd RPLP/1820). The scale of the allocation for Bowers Gifford and North Benfleet is strategic and should therefore be dealt with as a strategic allocation in the Local Plan and not delegated to the 	In recognition for the role of the Localism agenda, Policy SD3 acknowledges the efforts of local communities to shape their areas through Neighbourhood Plans, by setting appropriate housing targets for Bowers Gifford and North Benfleet and Ramsden Bellhouse Neighbourhood Plans, permitting them to exceptionally amend their Green Belt boundaries. Phasing is implied by the delivery assumptions set out in the Basildon Borough Housing Trajectory 2018. The Council considers Criterion 4 adequately mitigates the Local Plan to take over site identification at its first review, if neighbourhood plans fail to come forward, or the Neighbourhood Area designations expire before the review happens. The Council has not assumed development delivery in the

Section/Para/ Policy	Summary of Responses	Council's response
	 Neighbourhood Plan. (Home Builders Federation RPLP/1857, Wick 3 Nominees Ltd RPLP/1924, Gladman Developments Ltd RPLP/2018). Development delivery could otherwise be delayed if left to Neighbourhood Plan along with improvements to infrastructure. (Home Builders Federation RPLP/1857). This approach could cause delays to delivery of homes and new A127 junction. (Wick 3 Nominees Ltd RPLP/1924 and RPLP/1956). Backstop criteria for Local Plan Review to address allocation if Neighbourhood Plan not sufficiently advanced considered to be insufficient. (Wick 3 Nominees Ltd RPLP/1924 and RPLP/1956). Council could forward fund the junction on the A127 and seek to recoup the contribution arising from the development at Bowers Gifford and North Benfleet (1,350 homes) should it come forward providing more certainty and ensure that other planned developments are not potentially delayed. (Wick 3 Nominees Ltd RPLP/1924 and RPLP/1956). Council could de-couple strategic housing allocation from the Neighbourhood Plan. (Wick 3 Nominees Ltd RPLP/1924 and RPLP/1956). Policy SD3 not sound as it is not effective to delegate 1,350 to a Neighbourhood Plan, particularly as the growth in this location is connected to strategic infrastructure which could now be affected or delayed. (Persimmon Homes RPLP/2050). 	Neighbourhood Areas early within its Housing Trajectory. As such it does not consider modifications are necessary. The housing target for Ramsden Bellhouse and Bowers Gifford and North Benfleet has been informed by evidence and Sustainability Appraisal, in discussion with both Parish Councils. The Council will minimise the risk caused by the delivery of Neighbourhood Plans by working to secure the investment and provision of critical infrastructure necessary to support their quantum's of development as part of the immediate implementation of the Local Plan.

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	 All site allocations, in particular strategic Green Belt amendments should be in the Local Plan and not delegated to Neighbourhood Plans. (GL Hearn RPLP/2122). Matter must be addressed as there is a 4,000 shortfall in meeting housing needs. (GL Hearn RPLP/2122). Further information in relation to phasing should be set out in the Local Plan. (GL Hearn RPLP/2122). Neighbourhood Plan allocation should be additional buffer in the plan. (Bellway Homes and Crest Nicholson RPLP/2247). The delegation of the identification of sites at Bowers Gifford and North Benfleet to the Neighbourhood Plan is a barrier to meeting full OAN, as it delays delivery. Sites should be allocated within the Local Plan to meet the Full OAN. (Bellway Homes and Crest Nicholson RPLP/2247). The growth in Ramsden Bellhouse is insufficient to support new GP provision and should be served by improved access to existing services. (NHS England RPLP/2501). Other comment/s: Noak Bridge Parish Council keen to influence the design and development mix on site H10 through the Neighbourhood Plan. (Cllr Allen RPLP/934). Recognition of challenges in delivering housing in the short-term in Hovefields and Honiley. (Rochford District Council RPLP/1649). 	

Section/Para/ Policy	Summary of Responses	Council's response
	 Acknowledges caveat that Local Plan will review location if Neighbourhood Plan not sufficiently progressed. (Rochford District Council RPLP/1649). Council should continue to work positively and constructively with Neighbourhood Planning groups to ensure 5 Year Land Supply can be maintained. (Rochford District Council RPLP/1649). Strategic infrastructure references (a north-south link road) not included in 6.39 or SD2, which are relevant to Bowers Gifford Neighbourhood Area. (Essex County Council RPLP/1706). Want to work constructively with BBC and Parish Council to bring the site forward and deliver community benefits. (GL Hearn RPLP/2122). No specific comments to make on policies but would expect any mitigation identified through the SA as necessary to address impacts on biodiversity to be secured by relevant policies including funding mechanisms. (Natural England RPLP/2544). Advocates the allocation of land at London Road within the Bowers Gifford and North Benfleet Neighbourhood Plan. Modification/s requested: Revert to the proposals presented in the March 2018 Publication Local Plan for Bowers Gifford and North Benfleet. (Halsbury Homes Ltd RPLP/1392). 	In recognition for the role of the Localism agenda, Policy SD3 acknowledges the efforts of local communities to shape their areas through Neighbourhood Plans, by setting appropriate housing targets for Bowers Gifford and North Benfleet and Ramsden Bellhouse Neighbourhood Plans, permitting them to exceptionally amend their Green Belt boundaries.

Section/Para/ Policy	Summary of Responses	Council's response
	 The target number of dwellings should be reduced from 39 to 20-25 in Ramsden Bellhouse. Strategic infrastructure references (a north-south link road) should be included in 6.39 or SD2, which are relevant to Bowers Gifford Neighbourhood Area. (Essex County Council RPLP/1706). The plan should allocate only 200 dwellings to serviced settlements as proposed by Core Policy 1 of the Local Plan Core Strategy Revised Preferred Options Report 2013. (Millwood Designer Homes Ltd RPLP/1820). 	The housing target for Ramsden Bellhouse and Bowers Gifford and North Benfleet has been informed by evidence and Sustainability Appraisal, in discussion with both Parish Councils. The Council accepts modifications are necessary to 6.39 and SD2 and SD3 to include inter-relationship of strategic infrastructure linked to housing allocations within Neighbourhood Areas.
Policy SD4: Presumption in Favour of Sustainable Development	 Support: Policy SD4 is supported in principle. (Rochford District Council RPLP/1650). Policy SD4 reflects Government guidance. (Gladman Developments Ltd RPLP/2019). Policy SD4 provides a proactive approach to sustainable development. (Persimmon Homes RPLP/2055). Objection: Plan has not given sufficient weight to the protection of the Green Belt. The presumption in favour of sustainable development does not override the importance of protecting the Green Belt. (Billericay District Residents Association RPLP/1627). 	The Council considers that it has placed sufficient weight to the Green Belt; which is why, in part, the Plan does not meet its needs in full. The consideration of this issue is set out in relation to its

Section/Para/ Policy	Summary of Responses	Council's response
	Other comment/s: • Wording of policy needs updating to align with new NPPF. (Wick 3 Nominees Ltd. RPLP/1927 and RPLP/1958, Redrow Homes Ltd RPLP/2211). Modification/s requested: The plan needs to provide detailed justification as to how the plan addresses the development of Green Belt land which clearly does not fall within the presumption in favour of sustainable development. (Billericay District Residents Association RPLP/1627).	responses to comments made under Policy SD1. The Council accepts that the wording of the policy needs modifying to align with the NPPF2019. The Council considers that through the Plan, its Sustainability Appraisal and its evidence, including the Green Belt Topic Paper and Housing Options Topic Paper has justified why the release of Green Belt land to meet some of the development needs in the Borough is necessary and why exceptional circumstances exist.
Chapter 7: Buildin	g a Strong, Competitive Economy	
Chapter 7: Building a Strong, Competitive Economy	Objection: Highlights how economic forecasting is difficult in the short term let alone for a 20 year period and therefore disputes the accuracy of the predicted number of jobs in the local plan. (Billericay Action Group RPLP/1141).	The need for jobs has been informed by evidence in the ED topic paper and the EDNA, which uses respected economic growth models prepared by the East of England Forecasting Model (EEFM) as their base. This evidence based

Section/Para/ Policy	Summary of Responses	Council's response
	 SA identifies potential significant adverse impacts on ecological features and that at least one of the sites triggers one of our impact risk zones. We advise that policies should include a requirement for any proposal to demonstrate no adverse impact on ecology through a detailed ecological assessment and contain a commitment to securing mitigation where appropriate. (Natural England RPLP/2548). Modification/s requested: Employment forecasting is not an accurate prediction of the resulting job need in the future. (Billericay Action Group RPLP/1141). Policies in this chapter should include a requirement for any proposal to demonstrate no adverse impact on ecology through a detailed ecological assessment and contain a commitment to securing mitigation where appropriate. (Natural England RPLP/2548). 	approach is consistent with the requirements of the NPPF. Whilst the Council agrees that development proposals should not have an adverse impact on ecology having regard to the policy requirements of the NPPF, it is considered the proposed amendment suggested by Natural England is not necessary as the plan should be read as a whole, and this requirement for ecological assessment is sufficiently covered by Policy NE4. Policy E6 (1d) also states that Employment development of this site must also comply with all other relevant policy requirements of this plan.
Policy E1: Economic Growth Strategy	 Support: In general support of Policy E1 but however suggests that the policy could be more flexible to allow it to be more responsive to changing economic climate so that it can adjust to prevailing market conditions at the time of the application. (St Modwen Developments Ltd RPLP/2180 and Gladman Developments Ltd RPLP/2021). 	There are elements of support for policy E1. However, some flexibility to the policy is sought by some supporters. However, the Council is of the view that the policies are sufficiently flexible. Areas of Employment protection in the Local Plan have been informed by evidence base, however flexibility within the

Section/Para/ Policy	Summary of Responses	Council's response
	 In general support of the Policy. (Essex County Council RPLP/1708). In general support of policy E1 and welcome working with the Council to develop a Local Development Order (LDO). (Ford Motor Company RPLP/1998). In general support of the Policy. (Rochford District Council RPLP/1651). Support Policies E1 and E6. Objection: Recognise the contribution of "associated employment generating sui generis uses" to the Jobs number. (Essex County Council RPLP/1709). Policy E1 should recognise the contribution and potential improvements from the use of sustainable transport systems as a means for accessing new businesses / developments, as part of the highway mitigation measures. (Essex County Council RPLP/1710). Not enough jobs being proposed in Billericay and will lead to increased commuting and the commuters will have reduced parking space due to the loss of Radford Crescent Car Park to employment development. Jobs allocated in the plan are too excessive and should only be for local residents. Insufficient jobs allocated in Billericay and this will result in increased commuting. 	employment policies is provided by Policies E9 and E10. Flexibility is also provided in other employment policies where protection of specified Use Classes covers only a proportion of the site leaving the rest of the site flexible for other employment uses. There are however objections to the policy from residents (primarily Billericay residents) who believe that there is insufficient job provision in Billericay to align with the level of housing growth proposed. The Council agree it is recognised that it is desirable to align job growth and housing growth to reduce commuting. However, the economic development evidence base was unable to identify additional suitable sites for new employment development within Billericay. The A127 Enterprise Corridor is however close-by and is a suitable employment location, and policy T4 sets out proposals for increasing accessibility to this corridor by public transport to assist in reducing congestion on the road network. Whilst not proposing large scale

Section/Para/ Policy	Summary of Responses	Council's response
	 Modification/s requested: Suggested wording changes to policy E1 (2b) to allow the policy to be more flexible (St Modwen Developments Ltd RPLP/2180). And Amend policy E1 to be less restrictive to allow for a changing economic climate (Gladman Developments Ltd RPLP/2021). In general support of policy E1 and welcome working with the Council to develop a Local Development Order (LDO). (Ford Motor Company RPLP/1998). Amend policy E1 to recognise the contribution of 'associated employment generating sui generis uses' to the Jobs number. (Essex County Council RPLP/1709). Clarify Policy E1 to recognise the contribution and potential improvements from the use of sustainable transport systems as a means for accessing new businesses / developments, as part of the highway mitigation measures. (Essex County Council RPLP/1710). Not enough jobs being proposed in Billericay and will lead to increased commuting and the commuters will have reduced parking space due to the loss of Radford Crescent Car Park to employment development. Allocate jobs only for employees living in Basildon. 91ha is excessive for the Borough. The policy E1 should not aim to increase the proportion of in commuters to the Borough or the number of cross-Borough commuters. Insufficient jobs 	employment growth in Billericay, the Local Plan does however seek to protect existing employment areas in the Borough including Radford Way Business Park, Billericay and rural enterprise sites in Billericay at Guildprime Business Park and Barleylands Depot. This is consistent with the advice set out in the ELPS, EDNA and ED Topic Paper. Residents have expressed a concern that employment growth in Billericay may arise from the redevelopment of the Radford Way Car Park for employment development. There is no policy in the plan proposing development on the Car park, only amending the boundary of Radford Way employment area to include the car park on Radford Crescent. Sufficient protection will be provided by Policy T9 Parking provision within employment areas once the employment area boundary has been amended. However removing the proposed boundary change would leave the car park susceptible to a planning

Section/Para Policy	Summary of Responses	Council's response
	allocated in Billericay and this will result in increased commuting.	application for residential or employment development as the car park will not be protected by policy T9. ECC sought for some technical amendments to policy E1 to ensure consistency throughout the chapter and to ensure sustainable transport is seen as a facilitator of economic activity. The Council supports the following amendments: • Amend policy E1 to recognise the contribution of 'associated employment generating sui generis uses' to the Jobs number. • Clarify Policy E1 to recognise the contribution and potential improvements from the use of sustainable transport systems as a means for accessing new businesses / developments, as part of the highway mitigation measures.
		Ford have also commented on this policy in support, and indicated that they wish to work with the Council on a Local

Section/Para/ Policy	Summary of Responses	Council's response
		Development Order for their site at Dunton. The Council welcome this, and look forward to working with Ford to bring forward development which opens up employment opportunities at their site in a timely and coordinated manner.
Paragraph 7.22 Policies E2 and E3: Existing Employment Areas (Evidence Base – supporting text)	 Objection: There is contradicting evidence used regarding Radford Crescent Car Park i.e. Employment Land and Premises Study July 2013 and the Basildon Parking Capacity and Intervention Study" May 2017. This leads to conflicting policies within the Local Plan. One proposing loss of the Car park to employment uses E2/E3 and one protecting town centre car parks T9. (Billericay Action Group RPLP/1139, Billericay Town Council RPLP/1910). Include Basildon Water Recycling Centre and Courtauld Road Waste facility (Tovi Eco Park) within the Burnt Mills Employment Area. (Essex County Council RPLP/1711). Not enough jobs being proposed in Billericay and this will lead to increased commuting. Modification/s requested: Basildon Water Recycling Centre and Courtauld Road Waste facility (Tovi Eco Park) should be included within the Burnt Mills Employment Area. (Essex County Council RPLP/1711). 	It is noted that residents have raised concerns about the alignment of employment and housing growth in Billericay. The Council agree it is recognised that it is desirable to align job growth and housing growth to reduce commuting. However, the economic development evidence base was unable to identify additional suitable sites for new employment development within Billericay. The A127 Enterprise Corridor is however close-by and is a suitable employment location, and policy T4 sets out proposals for increasing accessibility to this corridor by public transport to assist in reducing congestion on the road network. Whilst not proposing large scale employment growth in Billericay, the Local Plan does however seek to protect existing employment areas in the

Section/Para/ Policy	Summary of Responses	Council's response
	 Do not allocate Radford Crescent Car Park for employment development. (Billericay Action Group RPLP/1139, Billericay Town Council RPLP/1910). Not enough jobs being proposed in Billericay and this will lead to increased commuting. Provision of jobs needs to be increased or scale of development reduced to reduce commuter infrastructure impact. 	Borough including Radford Way Business Park, Billericay and rural enterprise sites in Billericay at Guildprime Business Park and Barleylands Depot. This is consistent with the advice set out in the ELPS, EDNA and ED Topic Paper. Residents have expressed a concern that employment growth in Billericay may arise from the redevelopment of the Radford Way Car Park for employment development. There is no policy in the plan proposing development on the Car park, only amending the boundary of Radford Way employment area to include the car park on Radford Crescent. Sufficient protection will be provided by Policy T9 Parking provision within employment areas once the employment area boundary has been amended. However removing the proposed boundary change would leave the car park susceptible to a planning application for residential or employment development as the car park will not be protected by policy T9.

Section/Para/ Policy	Summary of Responses	Council's response
		The County Council seek for the 2 waste facilities on Courtauld Road to be shown within the employment area on the policies map. However, there 2 facilities are already allocated in the Waste Local Plan and on the Waste Local Plan Policies Map. This duplication therefore seems unnecessary.
Policies E2 and E3: Existing Employment Areas	 Support: Support for Policy E3 - Ford Dunton and Support economic growth in A127 corridor. (Brentwood Borough Council RPLP/1489) Objection: Suggest that an appropriate landscaping buffer be provided along the northern boundary of site for Policy E3 to screen the development and in particular to help preserve the settings of the grade II listed buildings to the north of the site. (Historic England RPLP/2146). Other comment/s: Ford requires a degree of flexibility of use across its retained sites as it develops and evolves its business models and require changes to policy wording to include complementary land-uses such as hotel/conference facility (Use Class C1); 	With regard to policy E2, the majority of comments are related to the scale and location of employment growth in Billericay, and are addressed above. Historic England have further sought for reference to be made to the historic environment. The Council is however of the view that as the purpose of this policy is to protect existing employment allocations rather than allocate new, there is sufficient coverage in relation to this matter in Policy HE1, and the plan should be read as a whole. With regard to policy E3, Ford – the owners of the site – have made some specific comments. They seek additional

Section/Para/ Policy	Summary of Responses	Council's response
	 Education and Training (Class D1) and Storage and Distribution (Class B8). Changes to be reflected on Policy Map. (Ford Motor Company RPLP/1999). There is currently no reference to the historic environment in Policy E2/E3. As part of a positive strategy for the historic environment it is important that the historic environment is considered for all themes of the plan, not just confined to the Historic Environment polices. (Historic England RPLP/2148). Against the loss of Radford Crescent Car Park to employment development. (Residents primarily from Billericay). Modification/s requested: Ford requires a degree of flexibility of use across its retained sites as it develops and evolves its business models. Policy E3 should be amended to allow for complementary land uses such as hotel/conference facility (Use Class C1); Education and Training (Class D1) and Storage and Distribution (Class B8). (Ford Motor Company RPLP/1999). Amend policy E2/E3 to include reference to the historic environment. (Historic England RPLP/2148). Include the requirement to providing an appropriate landscaping buffer along the northern boundary of site for Policy E3 to screen the development and in particular to help preserve the settings of the grade II listed buildings to the north of the site. (Historic England RPLP/2146). 	flexibility in relation to this policy to enable them to consolidate different parts of their business on the site, some of which sits outside use class B1. It is agreed that a modification to the policy to allow for complementary land uses such as hotel/conference facility (Use Class C1); Education and Training (Class D1) and Storage and Distribution (Class B8) could be acceptable subject to a masterplanned approach. Fords suggestion regarding an LDO for the site is considered by the Council as an appropriate way forward subject to an initial masterplan being agreed. Historic England has also commented on policy E3, seeking a landscaped buffer to the northern boundary of the site to preserve the setting a grade II listed buildings to the north of the site. There is already a significant buffer on this boundary, and therefore the need for further buffering will be dependent on the massing and height of development on the Ford site. Any impacts could therefore be assessed at the masterplan

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Section/Para/ Policy	Summary of Responses	Council's response
	Do not allocate Radford Crescent Car Park for employment development.	/ planning application stage against policies in chapter 17, and do not require a specific policy requirement for a landscape buffer at this time.
Policy E5: Land West of Gardiners Lane South, Basildon	 Objection: There is no reference to the provision of sustainable modes of transport including public transport improvements and improved site connectivity, as required in section 9 of the Publication THIA 2018. (Essex County Council RPLP/1712). Other comment/s: Suggests that Policy E5 could be more flexible to allow it to be more responsive to changing economic climate so that it can adjust to prevailing market conditions at the time of the application. (Inland Homes PLC RPLP/2263). Incorrectly refers to "Transport Impact Assessments" and this should be changed to "Transport Assessments". (Essex County Council RPLP/1713). Concerns about the delivery of H5 and E5. The site of H5 and E5 has recently seen approval of a small housing development against local council planning policy. I would therefore suggest that a Masterplan running alongside the High Development Framework is essential to the sites assembly. (RPLP/3544, RPLP/3616) Modification/s requested: 	To assist in the delivery of this site the Council commissioned a High Level Development Framework for Gardiners Lane South (2017) which sets out the overall development concept and development principles for the site, as well as tests different development options and phasing. In order to facilitate the delivery of this site and secure the relocation of some of the existing recreational uses to bring forward land for the alternative uses, a more detailed Development Brief/Masterplan will need to be prepared. However, the Council has undertaken considerable work in relation to this site already for the purposes of this plan. In terms of flexibility sought in relation to the mix of uses including employment uses on this site, the allocation for employment has been informed by the

Section/Para/ Policy	Summary of Responses	Council's response
	 Amend policy E5 to include reference to sustainable modes of transport and improved site connectivity. (Essex County Council RPLP/1712). Amend policy E5 to be less restrictive to allow for a changing economic climate. (Inland Homes PLC RPLP/2263). Amend policy E6 to refer to sustainable modes of transport, including public transport improvements. (Essex County Council RPLP/1713). A Masterplan and High Development Framework are needed prior to the Comprehensive Development of the Gardiners Lane South site. 	High Level Development Framework. Meanwhile the specific use requirements of this policy are based on evidence set out in the EDNA and in the Essex Growon Space Study Assessment. In terms of highways issues affecting this site, ECC have sought for some minor modifications to the supporting text which are largely supported by the Council. However, the Council is of the view that sustainable travel modes are already covered by the transport section and therefore if the plan is read as a whole it is not necessary to repeat the same requirement for each allocation policy.
Paragraphs 7.37-7.39 Policy E6: Burnt Mills Extension (Evidence Base – supporting text)	 Objection: There is no reference to the provision of sustainable modes of transport including public transport improvements, as required in section 9 of the Publication THIA 2018. (Essex County Council RPLP/1715). Other comment/s: 	The modifications sought by ECC in respect of these paragraphs are noted. It is agreed the reference to the 'new junction' should be amended to 'grade separated junction'. It is however felt that it is unnecessary to frequently refer to the requirement for sustainable travel modes when the plan should be read as

Section/Para/ Policy	Summary of Responses	Council's response
	 The references to a "new junction on the A127" are incorrect and should be amended to recognise that this is a "grade separated junction". (Essex County Council RPLP/1714). Modification/s requested: Amend policy E6 to refer to grade separated junction on A127 not a new junction. (Essex County Council RPLP/1714). Amend paragraphs 7.37-7.39 to include reference to sustainable modes of transport. (Essex County Council RPLP/1715). 	a whole and this is fully set out as a requirement in chapter 9.
Paragraphs 7.37, 7.38 and 7.40 Policy E6: Burnt Mills Extension (Evidence Base – supporting text)	 Objection: Policy E6 should be amended as a mixed development site to include a small area of housing in the southern corner which would assist in part to provide financial support for the graded junction at the A127. (Bowers Gifford and North Benfleet Parish Council RPLP/3683). Modification/s requested: Amend policy E6 to include a mix of housing and industrial development and include additional land to the southern corner. (Bowers Gifford and North Benfleet Parish Council RPLP/3683). 	The Council is clear that this is a strategic allocation for employment purposes intended to serve the whole borough now and into the future. This has been subject to consideration by the Council's committee system having regard to the suite of evidence and is considered an appropriate approach. This approach is supported by the SA. The Council does not support residential development in this location, and believes it could undermine the role of this site as a strategic employment allocation.
Paragraph 7.38	Other comment/s:	The modification to paragraph 7.38 which clarifies that the Neighbourhood

Section/Para/ Policy	Summary of Responses	Council's response
Policy E6: Burnt Mills Extension (Evidence Base – supporting text)	 Paragraph 7.38 lists the residential development in close proximity to E6 i.e. existing residential areas of Pitsea to the south, and new housing development proposed between Pitsea and Bowers Gifford in policy H11 but fails to mention the 1,350 homes planned for the Neighbourhood area. (Essex County Council RPLP/1717). Modification/s requested: Paragraph 7.38 should include the 1,350 homes planned for the Neighbourhood Area. (Essex County Council RPLP/1717). 	area has a housing target of 1,350 homes to plan for is supported.
Paragraph 7.43 Policy E6: Burnt Mills Extension (Evidence Base – supporting text)	Objection: The development of the land east of Burnt Mills Road for Gypsy, Traveller and Show People Site will not be delivered within the required timescales due to the need to deliver infrastructure improvements to enable good safe access and egress for very large, heavily laden vehicles which currently does not exist on the site. (Bowers Gifford and North Benfleet Parish Council RPLP/3686). Other comment/s: Reconsider the location and the expected timescales of 3 Traveller Show People sites in E6 due to necessary infrastructure improvements. (Bowers Gifford and North Benfleet Parish Council RPLP/3686).	The Council notes this objection to the provision of travelling showpeople plots within this allocation on the basis of current access. The Council is of the view that in securing access to the employment land, which will no doubt require servicing by 'large, heavy laden vehicles', access can also be secured to the required plots. There is therefore no reason to amend policy E6 for the reason stated.
Policy E6: Burnt Mills Extension	Support:	Due to the scale of this employment allocation, there are a number of

Section/Para/ Policy	Summary of Responses	Council's response
	 In general support of the policy but also offering alternative development possibilities if current proposals are rejected by highlighting that the landowners are flexible and would consider a mix with residential development if necessary. In general support of Policy E6 but however suggests that the policy could be more flexible to allow it to be more responsive to changing economic climate so that it can adjust to prevailing market conditions at the time of the application. (Gladman Developments Ltd RPLP/2023). Support Policies E1 and E6. Suggesting that Policy E6 should be mixed industrial and housing and pointing out that improvements to carriage infrastructure parallel to Osbourne road should be for walking and cycling. Objection: Wants Council to modify the policy to remove statement to the effect that "No development of the site should take place until improved access to the strategic road network at the junction of Pound Lane with the A127 has been secured." as this severely affects the viability and therefore deliverability of the site. Also requires flexibility in policy wording to support complementary uses. (St Modwen Developments Ltd RPLP/2181). Other comment/s: 	comments. Primarily these seek flexibility within the policy. Firstly, flexibility is sought to enable residential uses to be secured alongside employment uses. The Council has considered this site for residential purposes, but is satisfied that the evidence indicates it is best used for employment purposes, and its restriction to largely employment purposes will help to ensure that economic growth can take place less inhibited by amenity considerations of near neighbours. The High Level Development Framework for East Basildon does not identify this area for employment purposes, but does demonstrate how housing can be secured nearby to create a sustainable mix of development. The second area of flexibility sought is in relation to the mix of employment uses proposed. The requirements for this site are based on evidence set out in the EDNA and in the Essex Grow-on Space Study Assessment.

Section/Para/ Policy	Summary of Responses	Council's response
	 Recommend a delivery strategy is prepared for E6 to provide a level of certainty on delivery and implementation in relation to the employment area and the new Grade Separated Junction on A127 with Pound Lane and Cranfield Road/Tresco Way and links, in addition to a development brief or master plan. (Essex County Council RPLP/1718). Suggests that it is essential that public funding is secured to fund the delivery of the new junction on the A127 and it is not dependent upon securing funding from all the planned developments from which contributions will be sought. To do so would risk the deliverability of significant amount of housing growth and this major employment development. (Persimmon Homes RPLP/2057, Wick 3 nominees Ltd RPLP/1928 and RPLP/1959). There is a grade II listed building, Bradfields Farm, within the site and three other grade II listed buildings immediately surrounding the site to the south and east. Any development of the site has the potential to affect these designated assets and their settings. There is currently no mention of these assets in either the policy or supporting text of the Plan, without which the Plan is unsound. (Historic England RPLP/2147). A heritage impact assessment should be made and appropriate mitigation measures taken. (Historic England RPLP/2147). Policy E6 incorrectly refers to a new junction on the A127 and should be amended. (Essex County Council RPLP/1719). 	Another area of flexibility sought is in relation to the need for the grade separated junction on the A127 to enable development of this site. The THIA demonstrates the need for this junction to secure mitigation of the growth arising in this location. This requirement is therefore considered to be justified. It is noted that various comments were also made in respect of the delivery of the transport infrastructure for this site. Policy T2 identifies the need for the junction, policy IMP1 indicates the types of actions the Council will take to secure development, including the preparation of an IDP. An IDP accompanies the plan, and the Council is working with the Highway Authority (ECC) to prepare a delivery plan for this junction. Developments will nonetheless be expected to contribute towards this infrastructure project — it should not be expected that this will be entirely secured through public finances.

Section/Para/ Policy	Summary of Responses	Council's response
	 It makes no reference to the provision of sustainable modes of transport including public transport improvements, as required in section 9 of the Publication THIA 2018. (Essex County Council RPLP1719). Incorrectly refers to "Transport Impact Assessments" and this should be changed to "Transport Assessments". (Essex County Council RPLP/1719). Modification/s requested: Amend policy E6 to include a mix of housing and industrial development Amend policy E6 to be less restrictive to allow for a changing economic climate. (Gladman Developments Ltd RPLP/2023). Amend policy E6 to include a mix of housing and industrial development and the road parallel to Osborne Road should be used for walking and cycling only. Suggested wording changes to policy E6. (St Modwen Developments Ltd RPLP/2181). Recommend a delivery strategy is prepared for E6 to provide a level of certainty on delivery and implementation in relation to the employment area and the new Grade Separated Junction on A127 with Pound Lane and Cranfield Road/Tresco Way and links, in addition to a development brief or master plan. (Essex County Council RPLP/1718). 	In terms of highways issues affecting this site, ECC have sought for some minor modifications to the supporting text which are largely supported by the Council. However, the Council is of the view that sustainable travel modes are already covered by the transport section and therefore if the plan is read as a whole it is not necessary to repeat the same requirement for each allocation policy. Historic England have also commented due to the presence of a listed building on this site. They seek increased reference to the presence of this asset within policy E6 and its supporting text. The Council support this amendment. However, until such time as proposals for this site are developed for the planning application it is not possible for the requested Heritage Statement to be developed.

Section/Para/ Policy	Summary of Responses	Council's response
	 Secure public funding to deliver the new junction on the A127. (Persimmon Homes RPLP/2057, Wick 3 nominees Ltd RPLP/1928 and RPLP/1959). Include reference to relevant historic assets within and nearby to the site in policy E6. (Historic England RPLP/2147). Heritage Impact Assessments/Statements should be required for the site allocations. (Historic England RPLP/2147). Amend policy E6 to refer to grade separated junction on A127 not a new junction. (Essex County Council RPLP1719). Amend policy E6 to refer to sustainable modes of transport, including public transport improvements. (Essex County Council RPLP1719). Amend policy E6 to refer to Transport Assessments not Transport Impact Assessments. (Essex County Council RPLP1719). 	
Policy E7: Rural Enterprise Sites	 Objection: Recognise Barleylands as a Rural Enterprise site within Policy E7. (A H P Philpot & Sons Ltd RPLP/1805). Other comment/s: Inconsistent use of the terms "B-class employment development" and "B-class employment development and employment generating sui generis uses" in the economic development policies. (Essex County Council RPLP/1720). Modification/s requested: 	With regard to Barleylands the use mix primarily falls with use class A or use class D. The rural enterprise sites that have been identified are only those that are in line with the PPG and are existing B class employment sites of 0.25ha or more. The Council does not therefore support this modification It is notes that policy E7 does not cover the same mix of uses as earlier policies

Section/Para/ Policy	Summary of Responses	Council's response
	 Barleylands should be recognised as a Rural Enterprise Site within policy E7. (A H P Philpot & Sons Ltd RPLP/1805). Suggested wording changes to policy E7. (Essex County Council RPLP/1720). 	and is potentially in conflict. It is therefore agreed that the term B-class uses, and associated employment generating sui generis uses is the term used throughout the chapter 7, with the exception of policy E3, where the development mix is primarily to be targeted at higher end B1 uses only.
Policy E11: Aligning Skills and Jobs	 Support: In general support of Policy E11. (Essex County Council RPLP/1721). 	The support is noted. ECC and Basildon are currently working together to provide guidance on how it is expected construction apprenticeships are secured as part of S106 arrangements, making use of the apprenticeship levy.
Chapter 8: Ensuri	ng the Vitality of Town Centres	
Chapter 8: Ensuring the Vitality of Town Centres	 Support: Supports residential development within town centres. (Amberside Investments c/o Clearbell RPLP/2222). Objection: The strategy for town centres in policy R1 does not fully comply with the PPG and recommends that the definition of 'Main Town Centre Uses' in the local plan is amended to 	The definition of 'Main Town Centre Uses' within the local plan is consistent with national policy. Residential use is not defined as a main town centre use within the NPPF. Criterion 6 of policy R1 is considered sufficient to enable the provision of residential development within the Borough's town centres alongside the main town centre uses.

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	 include residential use. (London and Cambridge Properties Ltd RPLP/1899). There is insufficient parking provision within Billericay town centre. Modification/s requested: Amend definition of 'Main Town Centre Uses' to include residential use. (London and Cambridge Properties Ltd RPLP/1899). 	The Parking Capacity and Intervention Study identifies the potential need for car parking provision in each centre. As a consequence of that study policy T9 seeks to protect town centre car parking where there is potential deficit and support proposals to increase provision in areas of deficit.
Policy R1: Retail and Commercial Leisure Strategy	 Supports the sequential town centre first approach. (Rochford District Council RPLP/1652). Supports policy R1. (Arcadis RPLP/2199). Welcomes the regeneration of Basildon. Objection: Policies should focus on enhancing/ improving existing retail provision before allowing additional retail floorspace. (Iceni Projects Ltd RPLP/2130). Housing target for Basildon Town Centre should be a minimum, and not based on the use of housing densities but rather be flexible and market driven. (Iceni Projects Ltd RPLP/2130). Insufficient car parking within Billericay town centre and concerned about the loss of car park at Radford Way. 	With regard to the objections, firstly, there is no policy in the plan proposing development on the car park at Radford Way, only amending the boundary of Radford Way employment area to include the car park on Radford Crescent. Sufficient protection will be provided by Policy T9 Parking provision within employment areas once the employment area boundary has been amended. Secondly, it is noted that conditions in the market indicate that retail growth may be curtailed. However, the Council's evidence only recently prepared in the South Essex Retail Needs Assessment

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	 Other comment/s: Recommends amending policy R1 point 10 to provide more emphasis on sustainable modes of transport. (Essex County Council RPLP/1723). Modification/s requested: Policies associated with Basildon Town Centre should ensure that the existing retailing function is given the opportunity to respond to the market before allowing the introduction of greater levels of retailing floorspace. (Iceni Projects Ltd RPLP/2130). Amend the housing target for Basildon Town Centre so it's a minimum to be more flexible. (Iceni Projects Ltd RPLP/2130). Amend policy R1 point 10 to provide more emphasis on sustainable modes of transport. (Essex County Council RPLP/1723). Lack of infrastructure to support increase in local employment in Billericay therefore other parts of the Borough should accommodate growth. 	2017, indicates that there will be growth. In accordance with the NPPF, and important for the vitality of the town centres, it is critical that any growth that does occur will be focused on the town centres as part of Regeneration proposals which also see the current provision enhanced. In terms of modifications, firstly, the Council has evidence regarding its approach to housing supply, employment land supply and infrastructure provision, and does not feel that there is a need to revise its spatial approach to growth, in particular in relation to Billericay. The SA supports the approach taken. This modification is therefore not supported by the Council. Secondly, Policy R1 and R2 promote the regeneration of Basildon Town Centre which will involve the provision of new retail floorspace and the modernisation of existing stock and also their redevelopment to other main town centre uses where suitable. It would not be

Section/Para/ Policy	Summary of Responses	Council's response
		appropriate to restrict the provision of new retail floorspace in order to prioritise the use of existing stock which may no longer meet the required needs of retailers. This would not be compliant with national policy, and would potentially open up a risk that new floor space provision passes the sequential approach in out of town locations. This modification is not therefore supported. It is however agreed that the third amendment requested seeking greater flexibility regarding the number of residential units to be delivered in town centres should be made.
		Finally, ECC sought for further emphasis to be placed on sustainable transport modes. This is already covered by Policy R1 point 10. Sustainable transport is also sufficiently covered by the plan as whole – see transport policies T1, T3 and T4. This amendment is not supported.
Paragraph 8.16	Other comment/s:	ECC sought for further emphasis to be placed on sustainable transport modes.

Section/Para/ Policy	Summary of Responses	Council's response
Policy R1: Retail and Commercial Leisure Strategy (Evidence base – supporting text)	 Recommends amending paragraph 8.16 to reference the provision and improvements to sustainable transport. (Essex County Council RPLP/1722). Modification/s requested: Amend paragraph 8.16 to reference the provision and improvements to sustainable transport. (Essex County Council RPLP/1722). 	This is already covered by Policy R1 point 10. Sustainable transport is also sufficiently covered by the plan as whole – see transport policies T1, T3 and T4. This amendment is not supported.
Paragraph 8.24 Policies R2 to (Basildon Town Centre – supporting text)	Support: • Supports the approach to introduce a mix of uses within the town centre. (Iceni Projects Ltd RPLP/2142).	
Paragraph 8.31 Policies R2 to R5: Town Centre Regeneration (Basildon Town Centre – supporting text)	 Support: Welcomes reference to heritage assets in Basildon Town Centre and the requirement for new development to contribute positively to the area's historic quality. (Historic England RPLP/2149). Other comment/s: Makes reference to guidance documents on improvements to streets and public realm. (Historic England RPLP/2149). 	
Policy R2: Basildon Town	Support:	There is significant overlap between the objections and the modifications sought

Section/Para/ Policy	Summary of Responses	Council's response
Centre Regeneration	 Supports the regeneration of Basildon Town Centre as a key priority. (Amberside Investments c/o Clearbell RPLP/2222). General support for policy R2, particularly parts 1 to 4. (Infrared RPLP/2139). Objection: Policy is too prescriptive for the amount of residential development and should not provide a maximum number. (Arcadis RPLP/2200). Town Centre Masterplan is out of date and inconsistent with national policy. An alternative delivery mechanism should be used until it is revised. (Arcadis RPLP/2200). Objects to the regeneration of Basildon Town Centre being based on a Masterplan that is 7 years old and which requires a review. (Amberside Investments c/o Clearbell RPLP/2222). Part 2 should be more flexible to allow a wide range of uses within the town centre including alternative forms of living accommodation. (Infrared RPLP/2139). Part 3 should be more positively worded and flexible to enable a mix of main town centre uses. (Infrared RPLP/2139). Policy should be positively worded to encourage a night time economy beyond food/drinking establishments. (Infrared RPLP/2139). Evidence supporting this policy is not credible and does not reflect the true state of the town centre. 	in relation to this policy, so this responses deals with them together. Firstly, there is a concern that the Town Centre Masterplan is out of date. It was agreed with the delivery partner that there would be a 7 year review cycle, requiring an update in 2019. This is due to commence shortly. No modification to the Local Plan is required in respect of this, as it allows for the most up to date masterplan to be applied. Secondly, there is a concern that the policy for the town centre is not founded on evidence. Aside from the Town Centre Masterplan, there is physical evidence of delivery, evidence of future need for retail, leisure and employment space identified in the respective studies, and a national policy requirement to concentrate development around transport hubs such as the Railway Station and bus station. It is noted that some consultees consider that the housing figure for Basildon Town centre should be a minimum, and

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	 Recommends a master planned approach to Basildon Town Centre with residential above retail units in high density. More residential in the Town Centre would reduce the amount of housing in urban extensions. 	flexibility should be allowed to maximise opportunities. It is agreed that such flexibility would bring the Local Plan in better alignment with the NPPF, and therefore this amendment is supported.
	 Modification/s requested: Town Centre Masterplan needs updating and an alternative delivery mechanism should be used until it is revised. (Amberside Investments c/o Clearbell RPLP/2222). Amend part 2 of policy R2 to be more flexible including alternative forms of living accommodation. (Infrared RPLP/2139). Amend part 3 of policy R2 to enable a mix of main town centre uses. (Infrared RPLP/2139). Amend policy R2 to positively encourage night time economy beyond food/drinking establishments. (Infrared RPLP/2139). Further evidence supporting this policy is required to be credible and reflect the true state of the town centre. The Plan should have a masterplanned approach to Basildon Town Centre with residential above retail units in high density. Provide more housing with town centres. 	The Council remains however of the view that despite the ability to achieve higher densities in town centres it is not possible to meet the borough's housing need in its entirety through town centre regeneration alone, especially given the unmet need of around 2,000 homes. Urban extensions therefore remain a requirement of the Local Plan and no modification in this regard is supported. Various, additional qualifications are sought within this policy. It is considered that the policy as worded is sufficiently flexible to allow for a mix of uses, and when the plan is read as a whole, there is the flexibility to enable regeneration at higher density in the town centre. No further amendments to policy R2 are therefore supported by the Council.

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Policy R4: Pitsea Town Centre Regeneration	 Support: Welcomes a specific policy on Pitsea Town Centre. (London and Cambridge Properties Ltd RPLP/1906). Objection: Wording of policy R4 should be amended to include residential development. (London and Cambridge Properties Ltd RPLP/1906). Concern the Council has not provided sufficient evidence demonstrating the Duty to Cooperate. (London and Cambridge Properties Ltd RPLP/1906). Modification/s requested: Amend wording of policy R4 to include residential development. (London and Cambridge Properties Ltd RPLP/1906). A 'Duty to Cooperate Statement' is required. (London and Cambridge Properties Ltd RPLP/1906). 	The principle for residential development within town centres is set within policy R1, however it is agreed that reference to residential development could also be made within policy R4. The Council has sufficient evidence to address the Duty to Cooperate with the prescribed Duty to Cooperate bodies. This is set out in the Duty to Cooperate Statement which was updated in March 2018 and October 2018, presented on both occasions to Committee and then Council. This will be updated again prior to submission.
Paragraph 8.48 Policy R5: Wickford Town Centre Regeneration	Other comment/s: Recommends amending paragraph 8.48 to reflect recent enhancements/improvements to Wickford rail station. (Essex County Council RPLP/1724). Modification/s requested:	It is noted that improvements have been delivered around Wickford Railway Station. It is agreed paragraph 8.48 should be updated to reflect this change arising as a consequence of the passage of time.

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(Wickford Town Centre – supporting text)	Amend paragraph 8.48 to reflect recent enhancements/improvements to Wickford rail station. (Essex County Council RPLP/1724).	
Paragraphs 8.57-8.64 Policy R6: Billericay Town Centre Enhancement (Evidence Base – supporting text)	 Objection: Questions the need for accommodation development within Billericay. Questions viability for a new big supermarket. Insufficient parking in the High Street. Concern over disruptiveness of double decking car park. Other comment/s: Recommends amending paragraph 8.61 to provide a greater emphasis on sustainable transport modes. (Essex County Council RPLP/1725). Modification/s requested: Amend paragraph 8.61 to provide a greater emphasis on sustainable transport modes. (Essex County Council RPLP/1725). Remove mention of additional hotel accommodation. Encourage small format shops. Improve bus services. 	With regard to objections, the Council has evidence regarding its approach to housing supply, employment land supply and infrastructure provision, and does not feel that there is a need to revise its spatial approach to growth, in particular in relation to Billericay. The SA supports the approach taken. Specifically, with regard to parking provision, the Parking Capacity and Intervention Study identifies the potential need for car parking provision in each centre. As a consequence of that study policy T9 seeks to protect town centre car parking where there is potential deficit and support proposals to increase provision in areas of deficit. I terms of the objection regarding supermarket provision, the evidence indicates that at most only one large

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		supermarket is likely to be needed in the Borough as a whole over the plan period. It is more likely however that this demand will be mopped up by the convenience format and low cost retailers instead.
		In terms of modifications, it is agreed that paragraph 8.61 could place a greater emphasis on sustainable travel modes. This would also address the comment regarding improvements to bus services.
		No further modifications to policy R6, as suggested are however supported as the matters raised would reduce the flexibility of the plan, and/or run against the evidence base.
Policy R6: Billericay Town Centre Enhancement	 Objection: There are insufficient plans to improve the parking in Billericay. There is insufficient parking provision within Billericay town centre. Additional houses in Billericay will negatively impact on car parking within the town centre. Disagrees with decking the main car park in Billericay. Concern over disruptiveness of double decking car park. 	Rejected - Infrastructure upgrades have been incorporated in the Local Plan. Rejected - Whilst reference to sustainable transport has been included within the supporting text of policy R6, enhancements and improvements to

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	 New supermarket will negatively impact on car parking within the town centre. Additional houses in Billericay will negatively impact on the 	sustainable transport is set out within policies T1, T3 and T4.
	facilities within the town centre.	Rejected - A reduction in the level of housing is not supported by evidence.
	Other comment/s:	
	 Policy R6 should be amended to make reference to sustainable transport modes including public transport. (Essex County Council RPLP/1726). 	Rejected - Infrastructure proposals for Billericay will be brought forward alongside development as set out throughout the plan.
	Modification/s requested:	
	Amend policy R6 to make reference to sustainable transport modes including public transport. (Essex County Council RPLP/1726).	
	 Need to provide more parking provision in Billericay. Parking provision in Billericay needs improving. Reduce the number of houses proposed for Billericay. 	
	 Improve infrastructure and services before development occurs. 	
Policy R7: Town Centre Boundaries	 Objection: The boundary of Basildon Town Centre in policy R7 does not correspond with the area of the Masterplan. (Arcadis RPLP/2201). Policy R7 point 3 should refer to residential uses as well as other main town centre uses. (Arcadis RPLP/2201). 	The Council is aware that the functional town centre boundary does not include all of the masterplan area. The Council feels that there are edge of centre sites that can contribute towards the vitality of the town centre, most probably through residential development, but which do

Section/Para/ Policy	Summary of Responses	Council's response
	Modification/s requested: • Amend point 3 of policy R7 to residential uses as well as other main town centre uses. (Arcadis RPLP/2201).	not form part of the commercial component of the centre where a more specific mix of development will be sought.
		In terms of the modification sought, the Council is of the view that the policy does support residential development alongside other uses. The policy refers only to 'development' in point 3. It does not specify the different types of development as these are covered within point 1 of the policy. This enables the policy to remain flexible.
Policy R8: Primary Shopping Frontages	 Objection: Policy R8 needs to be amended to allow for exceptions where justified to enable town centres to be proactive and adaptive to changes. (Arcadis RPLP/2202). Modification/s requested: Amend policy R8 needs to allow for exceptions where justified to enable town centres to be proactive and adaptive to changes. (Arcadis RPLP/2202). 	The justification for setting thresholds is set out within the Shopping Frontage Review and Changes to Town Centre Boundaries report. The policy does allow for changes of use from Class A1 uses to other town centre uses providing the proportion of Class A1 use units does not fall below the prescribed threshold. No amendment to policy R8 is supported in respect of the modifications requested.
Policy R10: Local Centres	Objection:	The Retail and Leisure Study does suggest that a local centre of up to

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	 No additional local centres proposed in Billericay which will put a strain on existing centres in south Billericay. Modification/s requested: Two additional local centres are required in Billericay including at least one new medical centre of at least 225 sq.m. Additional parking at existing centres required particularly Meadow Rise and South Green. 	500sqm may be needed within Billericay to support growth, but caution is also shown in this recommendation. The sequential and impact tests would need to be applied at the time of application to ensure harm is not caused to existing local centres or the town centre if such a parade was to be provided. Given vulnerabilities in the retail sector at this time, the Council is minded to take a cautious approach in respect of this recommendation, as the policies in the plan are sufficiently flexible to enable appropriate provision if it was the right approach at a later date.
Policy R13: Locations for Hotel/Visitor Accommodation	 Objection: Recommends including specific reference to the listed building within criterion e of policy R13. (Historic England RPLP/2150). Other comment/s: Recommends making specific reference to the concerns made in the Sustainability Appraisal in policy R13. (Natural England RPLP/2549). Modification/s requested: 	It is agreed that policy R13 should be amended to reference the listed building and required specific mitigation of biodiversity impacts as requested by the statutory consultees and to align with the findings of the SA.

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	 Amend policy R13 to incorporate findings of the Sustainability Appraisal to include measures to mitigate the significant adverse effects on biodiversity by incorporating habitats within the development and enhancing habitats in the neighbouring Vange Hill and Golf Local Wildlife Site and Basildon Meadows SSSI. (Historic England RPLP/2150). 	
Policy R14: Locations for Town Centres Uses	Support: • Supports policy R14. (Arcadis RPLP/2203).	
Paragraphs 8.117 to 8.121 Policy R16: Hot Food Takeaways (Evidence Base – supporting text)	 Other comment/s: Recommends word changing to reflect latest evidence. (Essex County Council RPLP/1727). Recommends including reference to Health Impact Assessments. (Essex County Council RPLP/1727). Modification/s requested: Suggested wording changes to Policy R16 and supporting text. (Essex County Council RPLP/1727). Include reference to Health Impact Assessments. (Essex County Council RPLP/1727). 	The modifications sought in relation to the supporting text to policy R16 are both supported and it will ensure the latest evidence is reflected, and provide appropriate clarity to the reader regarding the cross-relationship with policy HC1.
Policy R16: Hot Food Takeaways	Objection: • Policy isn't based on an objectively assessed development requirement. (Kentucky Fried Chicken (Great Britain) Limited RPLP/1544).	The Hot Food Takeaway Assessment (2015) provides evidence of the link between clusters of hot food takeaways and areas of poor health. A primary

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	 Disagrees with the thresholds and distances prescribed within policy owing to a lack of evidence. (Kentucky Fried Chicken (Great Britain) Limited RPLP/1544). No assessment of the impacts of introducing this policy. (Kentucky Fried Chicken (Great Britain) Limited RPLP/1544). Unfair restriction on A5 class uses above other classes that may also provide similar foods. (Kentucky Fried Chicken (Great Britain) Limited RPLP/1544). Not consistent with national policy. (Kentucky Fried Chicken (Great Britain) Limited RPLP/1544). Criterion 2 of policy R16 should be deleted. (Kentucky Fried Chicken (Great Britain) Limited RPLP/1544). Modification/s requested: Delete criterion 2 of policy R16. (Kentucky Fried Chicken (Great Britain) Limited RPLP/1544). 	objective of the NPPF is to ensure the social wellbeing of residents, and this policy is intended to do so. No amendment to policy R16 is supported in respect of this representation.
Chapter 9: Promo	ting Sustainable Transport	
Chapter 9: Promoting Sustainable Transport	 Support: Natural England supports the requirement in Policy T1 to ensure that impacts upon the natural environment are prevented or mitigated. (Natural England RPLP/2551). Objection: 	A substantial number of the objections in relation to chapter 9 relate to the proposal for a Relief Route which would serve to relieve traffic congestion in the town centre whilst also providing access to the new development sites, which will further relieve the town centre of

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	 Concerned with congestion on the A127 and the ability of the road to cope with additional growth. The proposed Lower Thames Crossing would deliver some benefits to the region but adversely affect south Essex by reducing resilience on the A127 and A13. (Billericay Action Group RPLP/2042). Concerned with air pollution along the A127 and the potential for this to worsen with additional growth and the introduction of the Lower Thames Crossing. (Billericay Action Group RPLP/2042). Concerned with Rail infrastructure and the proposed improvements to capacity in the IDP will not alleviate peak services. National Rail demand projections are based on much more moderate growth levels than that proposed in the Local Plan. (Billericay Action Group RPLP/2042). Does not believe that the improvements promised by Abellio Greater Anglia will be as good as stated. (Billericay Action Group RPLP/2042). Understands that the ASELA authorities are requesting an improvement to Crossrail so that it will run beyond Shenfield to Southend but does not believe this will happen or get funding. (Billericay Action Group RPLP/2042). The proposed Billericay Relief Road is not an effective mitigation solution. Would like to see improvements at Sun Corner, Radford Way, and Stock Road. 	additional congestion. The proposed Relief Road is proven to effectively mitigate the impact of proposed growth in Billericay as evidenced by the Transport and Highway Impact Assessment and Addendum. The relief road will take traffic from the A129/A176 away from the town centre and is accompanied by several improvements to other junctions across Billericay including Sun Corner. The proposals are sufficiently detailed for the Local Plan. The public will be informed and consulted on the full scheme design of the relief road once known at a later stage in the planning process. The deliverability of the Relief Road has also been questioned. Essex County Council, as the Highway Authority, have been a joint partner in the commissioning of this work and have sufficient highway land under their control to ensure the required expansion of Frithwood Lane is delivered.

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	 Would like to see bypass to take all traffic to A127/A12/A129 away from town centre. Railway capacity is not intended to be increased. The proposed relief road in Billericay is not well defined in terms of whether or not it is an access road or relief road. There is no clear commitment to the relief road which should be provided at the same time as the houses. Other junction improvements should also be considered. Not enough parking spaces around the high street or at the station. The local plan in regards to Billericay is unsound and has been rejected by 80% of residents and would have unacceptable impact on the highway network/congestion, pollution, and parking. The proposed relief road will not alleviate these issues and will impact on residents of Frithwood. No option to expand existing roads, and growth will have impact on Green Belt and wildlife. No additional parking proposed in the plan. Minimal jobs for local residents meaning greater numbers commuting to London and no plans to increase rail capacity. Current transport infrastructure is at breaking point. Billericay and Wickford is served by one train line without any additional transport facilities and traffic will not be accommodated. 	Comments have also been made in respect of other highway improvements needed in Billericay. The Transport and Highway Impact Assessment identifies that junction improvements are required at B1007 High Street / Norsey Road / Western Road, London Road / High Street / Sun Street, A129 Southend Rd / Hickstars Lane, and includes two-way implementation on southern Laindon Road. All junction improvements and the relief road are set out in policy as being a requirement of any development proposal demonstrating the Council's commitment to their delivery. Comments have been received in relation to railway capacity also. Proposed increases to Railway Capacity are set out in the Council's Infrastructure Delivery Plan. This includes, amongst other things, notable journey time improvements and 55% more seats in the morning peak across the Liverpool Street line as part of the £1.4bn investment by the current franchise holder Abellio Greater Anglia.

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	 Consultation with bus companies should take place to see how increased demand will be met. The traffic modelling report referred to in the plan is from 2014 and is out of date. The more up to date report of 2017 shows that roads in Billericay are over capacity which leads to pollution which should be alleviated before development takes place. The A127 is congested at peak times and must be widened. Fortune of War should be straightened and M25 junction improvements to remove bottlenecks. Dunton roundabout is congested and is only likely to get worse. The cost of improvements will not be covered by development and the plan is not viable. Modification/s requested: 	Comments have also been received in relation to car parking capacity within Billericay High Street and at the station. The Essex Parking Standards - Design & Good Practice (2009) is considered appropriate in the Borough because they promote minimum requirements for parking for residential developments, but maximum requirements for parking in non-residential areas which is consistent with the NPPF which supports sustainable travel modes. However, the Vehicle Parking Capacity and Intervention Study recognises that there is parking congestion in this location and therefore the policies in this plan protect town centre and station car parking in
	 The Council should notify the public who will be affected by the relief road. Increase railway capacity. Provide a relief road which will effectively mitigate the growth proposed. Additional road improvements needed. Provide enough parking spaces around the high street and at the station. 	such instances. Comments have been made in relation to air quality concerns. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway

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	Development should be located to the west of Basildon where the transport impacts would be less severe.	mitigation schemes including the Billericay Western Relief Road, which are proven to alleviate the impact of growth on the highway network in this part of the Borough. Also, there is no air quality issue that are envisaged to occur as a result of the additional traffic as this has been adequately mitigated to ensure traffic flows without the stop/start congestion issues which cause problems with air quality. Alternative development locations have been suggested to the West of the Borough. Further development within the Basildon Borough at Dunton has been considered but would pose a risk to the soundness of the Basildon Local Plan due to the uncertainty around proposals in Brentwood and Thurrock beyond the Borough boundary. Traffic surveys have been carried out in May 2011, October 2014, February 2016, November 2016 and either uplifted or reduced to reflect a 2014 base year before forecasting began. This is in accordance with the
		requirements of the NPPF 'Transport

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		Evidence bases in Plan Making and Decision Taking' guidance and accurately reflects the Plan period 2014-2034.
		Comments have been received regarding suggested traffic improvements across the Borough. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes, which are proven to alleviate the impact of growth on the highway network in the Basildon Borough.
		The cost of development and its viability has been queried. The Council has carried out extensive viability appraisal to determine the appropriate contributions that will need to be made by developers and where there might be a funding gap that the Council will need to secure either through external sources of funding or through the adoption of a

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Additional suggestions have been made in relation to the A127 to improve the highway network. The Council is engaged in various cross authority working arrangements to deliver improvements to the A127 including with Opportunity South Essex, the Association of South Essex Authorities (ASELA), Essex County Council, South Essex Active Travel partnership and Highways England. A Statement of Common Ground has been signed between all authorities along the A127 and ECC, and more recently a cross authority A127 Task Force has been formed with MP involvement to lobby Government for improvements along this	appraisal to determine the level of contributions that developers can afford and is non-negotiable. If the developer does not pay the appropriate contribution or deliver the appropriate improvement to the highway, planning permission will not be granted.
	in relation to the A127 to improve the highway network. The Council is engaged in various cross authority working arrangements to deliver improvements to the A127 including with Opportunity South Essex, the Association of South Essex Authorities (ASELA), Essex County Council, South Essex Active Travel partnership and Highways England. A Statement of Common Ground has been signed between all authorities along the A127 and ECC, and more recently a cross authority A127 Task Force has been formed with MP involvement to lobby

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Community Infrastructure Levy. This Levy has also been subject to viability appraisal to determine the level of

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		corridor. As part of this work, a scheme design is being produced for the improvement of the Fortune of War junction.
Paragraph 9.1 Policy T1: Transport Strategy	 Support: The Parish Council supports Policy T1 and A127 Corridor improvements. (Bowers Gifford and North Benfleet Parish Council RPLP/3697 and RPLP/3698). The Parish Council supports the A127/Pound Lane junction improvement. (Bowers Gifford and North Benfleet Parish Council RPLP/3697 and RPLP/3698). Objection: Policy T1 fails to recognise the potential to improve bus links to industrial areas, which could also stop in North Benfleet. (Bowers Gifford and North Benfleet Parish Council RPLP/3697 and RPLP/3698). The A127/Pound Lane junction improvement policy needs modification to clearly explain improvement will also serve Bowers Gifford and North Benfleet housing allocations. (Bowers Gifford and North Benfleet Parish Council RPLP/3697 and RPLP/3698). There has been no co-ordinated approach between authorities. 	Comments have been made regarding building a new town at the Ford site in Dagenham. Supposing the Ford site in Dagenham were to be vacated, and the site were to be redeveloped for housing, this would contribute to the housing need of the London Borough of Barking & Dagenham. As the Greater London Authority is unable to meet the housing needs of its own area, it is unlikely that these additional houses could be considered to be meeting the needs of the Basildon Borough. Therefore, such a proposal would not have any impact on the necessity for Basildon Borough Council to produce a plan which positively seeks to meet its own housing needs. Comments were raised regarding the public transport and links to industrial areas. Basildon Borough Council

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	 A new town should be built by central Government along the A128 corridor or on the Ford site in Dagenham when this is vacated, rather than in the Basildon Borough. Modification/s requested: Remove unnecessary bus link for Tyefields / Pound Lane. (Bowers Gifford and North Benfleet Parish Council RPLP/3697 and RPLP/3698). Utilise the new grade separated junction on the A127 with link road through the employment allocation and add link road to A130 in order to direct traffic away from Pound Lane. (Bowers Gifford and North Benfleet Parish Council RPLP/3697 and RPLP/3698). 	recognises the need to improve public transport links to the A127 Employment Corridor and Policy T1 c states that the Council will work in partnership with public transport providers and Network Rail to develop better links, access and capacity for the railways and bus network which could potentially include addressing the need for better links to the employment corridor. The Council does agree with Bowers Gifford and North Benfleet Parish Council in that the supporting text to Policy T1 could explicitly mention the need for a better link in this part of the Borough to show a greater degree of commitment in recognising the local issues that the Borough faces and to provide clarification that the policy recognises this need. However, The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes

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		including the new junction on the A127, which are proven to alleviate the impact of growth on the highway network in this part of the Borough. This includes the need for a bus link for Tyefields/Pound Lane, and the link road. The new grade separated junction on the A127 was previously explored as a 3 phase scheme which extended from the Pound Lane junction to the north east in Shotgate, connecting to the A129 and the A130 respectively. The modelling results from the HIA Part 1 report illustrate that traffic diverted onto the new link at Pound Lane from the A130 resulted in 'rat running' through east Basildon and the town centre causing local congestion issues, rather than using the strategic highway network connection from the A130 to the A13, providing no benefit to the highway network and junctions located within the Basildon area. Therefore, this option has only been taken forward in the latest version of the Basildon Revised Publication Local Plan with the phase 1 link only. The scheme is still subject to

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		design, detailed junction modelling and it is assumed that any new junction would be built 'fit for purpose' to accommodate future traffic growth.
		Comments have been made regarding the lack of work between neighbouring authorities. A Statement of Common Ground is in place with South Essex Authorities already. This was approved in June 2018. A separate Statement of Common Ground has been prepared for Chelmsford, as a neighbour siting outside south Essex.
Paragraph 9.7 Policy T1: Transport Strategy	 Objection: Many junctions in the Borough will exceed their capacity and the impact of growth will be severe. Parking in Billericay is at peak capacity. There is no capacity for cycle lanes. Other comment/s: Recommend amendments to reflect the most up to date position being undertaken by OSE ASELA, the A127 Statement of Common Ground, as well as A127 Task Force and South Essex Active Travel Partnership. (Essex County Council RPLP/1728). 	With regard to the matter of junction capacity raised in objection to this policy, the Basildon Borough Local Plan Transport and Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes which are proven to alleviate the impact of growth on the highway network.

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	Modification/s requested: • Wording changes to paragraph 9.7 suggested. (Essex County Council RPLP/1728). • Additional road improvements needed.	Comments have also been received in relation to car parking capacity within Billericay High Street and at the station. The Essex Parking Standards - Design & Good Practice (2009) is considered appropriate in the Borough because they promote minimum requirements for parking for residential developments, but maximum requirements for parking in non-residential areas which is consistent with the NPPF which supports sustainable travel modes. However, the Vehicle Parking Capacity and Intervention Study recognises that there is parking congestion in this location and therefore the policies in this plan protect town centre and station car parking in such instances. It is indicated that no provision is made for cycling. This provision is clearly set out in policy T3. ECC have sought a modification to paragraph 9.7. This modification is supported by the Council for providing clarity.

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Paragraphs 9.10 – 9.11 Policy T1: Transport Strategy	 In general support of Chapter 9 but para 9.10 should be amended to reflect the current stages of consultation by Highways England on the Lower Thames Crossing. (Thurrock Borough Council RPLP/856). Other comment/s: Acknowledge the references to the Lower Thames Crossing, however recommend that the references to this NSIP project are updated to reflect the current stage of this Development Consent Order, including the references to the emerging route. (Essex County Council RPLP/1730). Recommend greater emphasis and reference is made to the sustainable modes of transport and the potential public transport mitigation measures as identified and referenced within Section 9 of the Publication THIA 2018 Report. (Essex County Council RPLP/1732). Modification/s requested: Suggested wording changes to paragraph 9.10. (Thurrock Borough Council RPLP/856, Essex County Council RPLP/1730). Suggested wording changes to paragraph 9.11. (Essex County Council RPLP/1732). 	The modifications sought by ECC in respect of paragraphs 9.10 and 9.11 are supported by the Council for the purpose of improving clarity and accuracy.
Paragraphs 9.16 - 9.17	Objection:	The Basildon Borough Local Plan Transport and Highway Impact

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Policy T1: Transport Strategy	 The proposed Billericay Relief Road is not an effective mitigation solution. There needs to be new roads, widened roads, well-signed multi-lane junctions and intelligent traffic lights. Proposed development in Billericay is not in keeping with Green Belt surroundings. The town has already expanded significantly in recent years and road junctions and the local train station will become more overcrowded. Modification/s requested: Provide a relief road which will effectively mitigate the growth proposed. Additional road improvements needed. 	Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes which are proven to alleviate the impact of growth on the highway network. Comments have been received in relation to railway capacity also. Proposed increases to Railway Capacity are set out in the Council's Infrastructure Delivery Plan. This includes, amongst other things, notable journey time improvements and 55% more seats in the morning peak across the Liverpool Street line as part of the £1.4bn investment by the current franchise holder Abellio Greater Anglia.
Paragraphs 9.19 - 9.22 Policy T1: Transport Strategy	 Other comment/s: As set out in response to Paragraph 7.37 & 7.39, the reference to the provision of 'a new junction on the A127' is incorrect and should be amended to correctly refer a 'new grade separated junction on A127/Pound Lane and Cranfield Park Road/Tresco Way'. There is a need to provide a level of certainty on the 	A series of amendments are proposed by ECC in respect of paragraphs 9.19 to 9.22. The Council is satisfied that these amendments are appropriate to improve the clarity and accuracy of the plan.

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	 phasing and provision of the development and infrastructure. (Essex County Council RPLP/1733). Acknowledge the reference to localised improvements, however need to reference improvements to the road network and to sustainable transport including public transport as referenced in Section 9 in the Publication THIA 2018. (Essex County Council RPLP/1734). Acknowledge the purpose of paragraph 2.21 however there is no reference to the wider sustainable transport strategies which have informed the preparation of the document. (Essex County Council RPLP/1736). Note the references to the Basildon Integrated Transport Plan which will provide some of the solutions. (Essex County Council RPLP/1738). The reference in the Basildon Local Plan to provide the sustainable and public transport improvements should be amended. The onus is on BBC to obtain this from the developers as part of the necessary sustainable transport improvements (as identified in Section 9 of the Publication THIA Report 2018 and Addendum); or in accordance with the policies plan. Hence it is recommended that the strategic site allocations (E6 and H5 - H20) include the identified sustainable transport mitigation measures as set out in Section 9 of the Publication THIA, within the policy to enable the measures to be realised as part of the wider transport mitigation measures. (Essex County Council RPLP/1738). 	

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	 Modification/s requested: Amend paragraph 9.19 as suggested. (Essex County Council RPLP/1733). Amend paragraph 9.20 as suggested. (Essex County Council RPLP/1734). Amend paragraph 9.21 as suggested. (Essex County Council RPLP/1736). 	
Policy T1: Transport Strategy	 Support: General Support for proposed improvements to local and strategic highway network and the commitment to encourage modal shift. (Rochford District Council RPLP/1653). References ongoing engagement with ECC for potential mitigation measures to support the South Essex JSP, which is particularly important with regards to A127. (Rochford District Council RPLP/1653). Rochford supports highway and sustainable transport improvements which would facilitate better access for the district's residents to key employment, retail and leisure destinations within Basildon Borough recognising interrelationship between both areas. (Rochford District Council RPLP/1653). Supports part a.) of policy T1. (Martin Grant Homes (UK) Ltd RPLP/1778). 	The Basildon Borough Local Plan Transport and Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes which are proven to alleviate the impact of growth on the highway network. Highways England have however objected to this modelling as it does not include the modelling of impacts on the M25 junction with the A127. However, growth in Basildon is captured in the modelling that has been undertaken for the A127 Route Management Strategy, and therefore discussions are ongoing with Highways England to resolve this matter. It should

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	 Natural England supports the requirement for new proposals to ensure that impacts upon the natural environment are prevented or mitigated. (Natural England RPLP/2551). Objection: Connectivity of off-road routes is imperative for the safety of vulnerable road users such as pedestrians, cyclists, equestrians and the disabled. (Essex Bridleways Association RPLP/360). A multi-user bridge or underpass must be provided as part of any long-term scheme for Fairglen interchange. (Essex Bridleways Association RPLP/360). Equestrians has been omitted from policy consideration which only focusses on pedestrians and cyclists. (Essex Bridleways Association RPLP/360). Highways England is concerned that any material increase in traffic on the already heavily congested A13, A127, A1089 could have an impact on the Strategic Road Network (SRN) for which they are the authority for. It would seem that the impact on the SRN has not been assessed to date and without this, Highways England are unable to make an informed decision as to the soundness of the plan due to a lack of evidence. (Highways England RPLP/2072). The Local Plan implies there is a proposed A127 relief road programmed and funded through the Joint Strategic Plan. There is not and is unlikely to receive public funding. 	be noted that Basildon have supplied Highways England with its growth information for the purposes of modelling the Lower Thames Crossing, and the junctions of concern are outside Basildon Borough someway to the west. A substantial number of the objections in relation to chapter 9 relate to the proposal for a Relief Route which would serve to relieve traffic congestion in the town centre whilst also providing access to the new development sites, which will further relieve the town centre of additional congestion. The proposed Relief Road is proven to effectively mitigate the impact of proposed growth in Billericay as evidenced by the Transport and Highway Impact Assessment and Addendum. The relief road will take traffic from the A129/A176 away from the town centre and is accompanied by several improvements to other junctions across Billericay including Sun Corner. The proposals are sufficiently detailed for the Local Plan. The public will be

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	 Therefore, the Transport Strategy should be based on junction improvements to improve capacity and allow much needed housing to come forward. (Land Group (Billericay) Ltd RPLP/1436). No reason for the phasing of H12 to be aligned to the new junction when other allocation sites in Wickford (H13-H15) and to the east of Basildon (H11) are not also aligned. Linking to just one site is unjustified. HIA states that development at H12 can be completed within the existing network. Even greater levels of growth could be provided at H12 using existing available highway capacity or significantly more if a new junction is delivered. (Pigeon (Wickford) Ltd RPLP/2232). No clear time period or funding mechanism for the construction of the junction and delaying delivery of H12 on transport grounds is unjustified. (Pigeon (Wickford) Ltd RPLP/2232). The HIA does not clarify how the grade separated junction on the A127 is required for the delivery of H12. The requirement is therefore unjustified. The HIA does not provide sufficient detail to determine when a junction may be required nor to require that junction to be phased with any particular development. (Pigeon (Wickford) Ltd RPLP/2232). The HIA demonstrates that the new junction is not required to serve Wickford, it relieves east Basildon and the impact on Wickford is just an additional benefit. The Council has incorrectly reflected the conclusions of the HIA. (Pigeon (Wickford) Ltd RPLP/2232). 	informed and consulted on the full scheme design of the relief road once known at a later stage in the planning process. The deliverability of the Relief Road has also been questioned. Essex County Council, as the Highway Authority, have been a joint partner in the commissioning of this work and have sufficient highway land under their control to ensure the required expansion of Frithwood Lane is delivered. In relation to its funding meanwhile, the relief road is expected to be delivered by the developers of sites to the south west of Billericay and this policy requirement has been tested as part of the Whole Plan Viability Appraisal and found to be deliverable. Therefore cost, funding and timing have all been set out in the Local Plan. A developer has queried junction improvements and funding for site H12. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of the transport

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	 None of the evidence suggests that Wickford requires a new link to serve the proposed level of growth either. (Pigeon (Wickford) Ltd RPLP/2232). Policy T1, T2 and T5 appear to identify that there are resources available to support development of strategic transport infrastructure. This is understood not to be the case and that improvements to highway infrastructure will need to be funded by developers. (Dale Farm Residents Group RPLP/3202, The Gypsy Council RPLP/3205). Housing development proposals in Billericay have not been selected on the basis of policy requirements T1 (a), which calls for new development to minimise the need to travel and calls for alternatives to the private car, T1 (d) which calls for measures for behavioural changes in travel choices, or the NPPF which suggests that development should be located near sustainable transport modes. Too many houses located in Billericay and nearly all on Green Belt. Additional housing development across the Borough will make the congestion worse. Additional housing will cause more flooding. Lack of jobs in Billericay will mean new residents will have to commute and current infrastructure cannot support this. Lack of employment land in Billericay will inevitably result in increases in commuting, congested local roads and associated pollution and health issues. 	network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes including the grade separated junction on the A127 which are proven to alleviate the impact of growth on the highway network in this part of the Borough. The impact of the new junction would not only alleviate congestion at the Nevendon junction but also all junctions through the centre of Wickford and junctions to the east of Basildon. The link roads associated with the new junction from Cranfield Park Road / Tresco Way in Wickford and to Courtauld Road and the A127 corridor in Basildon is proven to alleviate congestion on junctions in the centre of Wickford, which site H12 would undoubtedly contribute to. Therefore, it is reasonable to assume that contributions should be made towards the grade separated junction as this is proven to be the most effective solution to ensuring that the impact of growth in the Wickford and east Basildon area does not result in a 'severe' impact on the highway network. It is noted that additional

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	 With limited employment growth in Billericay, new residents will need to commute. No extra hospitals, doctor's surgeries, schools or police planned. One new school planned but only up to certain age, what happens when these children need to continue their education. No details on infrastructure such as GP surgery, Billericay Station, dentists, and how will Basildon Hospital cope? Cycle lanes will not help and buses need to be competitively priced. Cycling is mentioned but Billericay has many hills and is unsafe for cyclists or new cycle infrastructure. No meaningful improvements to public transport are committed. Already a lack of parking in Billericay and Radford Crescent Car Park will be lost to industrial development. Billericay does not have enough parking and existing car parks to be lost. Concerned with overcrowding of Billericay in terms of GPs, schools, car parking, road and rail infrastructure. Also concerned with congestion on A127. Traffic mitigation measures are inadequate to prevent unacceptable congestion. The Billericay Relief Road is not deliverable and there has been no update to the evidence to support the increase in housing in Billericay. 	clarification should be provided to ensure that other developments (H13-H15, H11, E6 and the Bowers Gifford & North Benfleet Neighbourhood Plan) also need to be more clearly phased to align with the delivery of the new junction. Various queries in relation road improvements have been received. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes, which are proven to alleviate the impact of growth on the highway network in the Basildon Borough. In addition to this the Local Plan recognises that this level of growth will also have an impact on the A127 and A13 corridors and has identified a number of studies being carried out by Essex County Council, as the Highway Authority, for dealing with congestion issues along these routes. The potential mitigation schemes that could come out of the JSP is mentioned

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	 Cost and efficacy of the relief road is not assessed or clear. Traffic evidence should be re-visited in light of alternative analysis and provide details of the cost, funding and timing of the relief road. Inadequate analysis on the effects on road traffic. Road junctions over capacity. Trains and roads in Billericay are at maximum capacity and will need improving to cope with new homes. No provision for extra commuters, either by road or by train in Billericay. Transport strategy does not mention rail or bus improvements, only road access is considered. Local roads in Billericay cannot cope with extra-demands from large scale development. Norsey road one-way restriction has be trialled and abandoned in the past. It will cause additional congestion and pollution and is not effective or justified. The 'token' improvements to infrastructure will not make any difference. Rush hour traffic in and out of Wickford on routes such as A130, A127, A129 are very congested. Plan does not appear to address the problems of congestion in Wickford and this will have a negative impact on road safety, particularly for school children. Where is the evidence to show required improvements to A127/A130 interchange and Hospital access? Why are no 	as part of a much wider strategy for dealing with the impact of future growth along the A127, all of which are mentioned within the Revised Publication Local Plan. Comments relating to Wickford and congestion have been made. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes including the grade separated junction on the A127 which are proven to alleviate the impact of growth on the highway network in this part of the Borough. The impact of the new junction would not only alleviate congestion at the Nevendon junction but also all junctions through the centre of Wickford and junctions to the east of Basildon. The link roads associated with the new junction from Cranfield Park Road / Tresco Way in Wickford and to Courtauld Road and the A127 corridor in Basildon would

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	changes planned to A176/A127 junction as recent changes have failed to make any improvements? Most junctions in Billericay are over capacity now, where is the mitigation modelling for the north of the Borough (Billericay)? No evidence that the relief road will significantly relieve traffic, it will only serve the new development. • There are better ways of reducing congestion at Sun Corner than the proposed relief road which will cause noise and pollution along Frithwood Lane. • Norsey Road one-way has previously been tried and abandoned. • Poor maintenance of roads and pavements. Other comment/s: • There's no specific reference to working with developers to produce Residential Travel Plans. Please note that there are a range of Travel Plans which cover Residential, School and Workplace, and references to the full range should be included within the document. (Essex County Council RPLP/1738). • Noted that funding has been secured to improve Fairglen Interchange. (Essex Bridleways Association RPLP/360). • Interested in reconnecting severed rights of way across the A127. (Essex Bridleways Association RPLP/360). • Agree that such a significant improvement scheme as the A127 junction will require funding beyond what can be secured	provide an alternative route between the Basildon & Wickford town centres and is proven to alleviate congestion on junctions in the centre of Wickford. There have been comments concerned with the funding for road infrastructure improvements and the identification of necessary land. Since 2011, and in relation to the Basildon Borough, the Essex Transport Strategy has secured major investment into the Borough's transport network including the new £63m junction upgrade on the A13/A130 at Sadlers Farm (completed 2013) and the £5m highway works to improve capacity in the A127 enterprise Corridor (completed 2011). More recently, £3m pinch point funding from the Department for Transport (DfT) was secured to widen a key part of the A176 between Basildon Hospital and Basildon Town Centre, to support expansion of the Town Centre and address congestion of this link. Funding has also been secured from SELEP to fund various improvements along the A127 Corridor including £27m

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	 by developer contributions. (Pigeon (Wickford) Ltd RPLP/2232). Modification/s requested: Suggested wording changes to art 1. b) of policy T1 with regards to travel plans. (Essex County Council RPLP/1738). Equestrians has been omitted from policy consideration which only focusses on pedestrians and cyclists. (Essex Bridleways Association RPLP/360). The Local Plan implies there is a proposed A127 relief road programmed and funded through the Joint Strategic Plan. There is not and is unlikely to receive public funding. Therefore, the Transport Strategy should be based on junction improvements to improve capacity and allow much needed housing to come forward. (Land Group (Billericay) Ltd RPLP/1436). The site north of Wash Road, Noak Bridge demonstrates a location for development that is able to take advantage of its strategic position close to the A127, but not directly adjacent to it and as such does not demonstrate a direct or detrimental impact on it. This site should be included within the plan to assist in meeting the unmet need. This will better shape Policy T1 in approaching the Transport Strategy and attribute greater weight in seeking transport intervention through alternative means. (Southern and Regional Development Ltd RPLP/2091). 	for improvements to the A127/A130 Fairglen Interchange. A further £13m has also been secured for the Basildon Integrated Transport Package which will help to deliver public transport improvements, highway changes required by the Basildon Town Centre Masterplan and improved access to Basildon Hospital. Securing funding of this nature is most certainly the case for development which is occurring now and will continue to be secured in this way throughout the Local Plan period to ensure the delivery of highway improvement schemes, particularly where highway improvements will not be able to be paid in full by the developer without making the development proposals unviable. However, this does not cover the total cost of all highway upgrades and developers will be expected to pay for transport improvements where it is necessary to make the development acceptable in planning terms. However, development can also be phased in the Local Plan with the introduction of new infrastructure

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	 Paragraphs 9.14 and 9.19 be modified to take into account the evidence provided within the PLP HIA that demonstrates access to site H12 can be delivered through junctions that are shown to require sustainable mitigation measures rather than physical hard measures. H12 should therefore be specifically detached from the reference to Wickford in the context of capacity constraints in this paragraph. (Pigeon (Wickford) Ltd RPLP/2232). The aspirations of the Council are misconceived. The market needs to identify what support it is willing to make to existing highway infrastructure. (Dale Farm Residents Group RPLP/3202, The Gypsy Council RPLP/3205). Basildon Council has not identified land to the north of the A127 that is required for highway improvements, yet has identified that this is the case when seeking to prevent development. (Dale Farm Residents Group RPLP/3202, The Gypsy Council RPLP/3205). Provide a relief road which will effectively mitigate the growth proposed. Commit to public transport improvements. Traffic evidence should be re-visited in light of alternative analysis and provide details of the cost, funding and timing of the relief road. Improve highway safety for cyclists. Provide sufficient infrastructure. 	which is funded from a combination of developers and public funding, providing there is a reasonable prospect that funding can be secured from alternative sources in order to deliver it. The Council has carried out extensive transport modelling to determine mitigation options for the highway network in order to cope with the additional traffic impact of growth in the Borough. The Council has also carried out extensive viability appraisal to determine the appropriate contributions that will need to be made by developers and where there might be a funding gap that the Council will need to secure either through external sources of funding or through the adoption of a Community Infrastructure Levy. This Levy has also been subject to viability appraisal to determine the level of contributions that developers can afford and is non-negotiable. If the developer does not pay the appropriate contribution or deliver the appropriate improvement

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	 Provide enough parking spaces around the high street and at the station. Encourage sustainable modes of transport. Increase railway capacity, trains are too busy and expensive. Housing numbers in Billericay should be reduced to sustainable levels. 	to the highway, planning permission will not be granted. Comments were made in relation to highway improvements. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes including the Billericay Western Relief Road, which are proven to alleviate the impact of growth on the highway network in this part of the Borough.
		Comments in relation to Billericay road improvements were received. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes including the Billericay Western Relief Road, which are proven to alleviate the impact of growth on the highway network

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		in this part of the Borough. Essex County Council, as the Highway Authority have been a joint partner in the commissioning of this work and have sufficient highway land under their control to ensure the required expansion of Frithwood Lane is delivered.
		It is suggested that policy T1 should be modification to promote sustainable travel modes. This is already clearly the intent of policy T1 with sustainable travel modes mentioned throughout. However, it is noted that ECC seek reference to residential travel plans within part b of the policy. The Council agrees that this amendment would be useful for clarity.
		Several consultees have sought for policy requirements to be included within policy T1 regarding cycling and public transport access. These are covered in policies T3 and T4 respectively, with provisions also set out in the IDP. No amendment to policy T1 is therefore needed in respect of these representations. It is however accepted

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equestrians are captures as requested by the Bridleway Association. The Council does not however have the evidence to commit to a multi-user bridge at the Fairglen Interchange as suggested by this organisation.	
Comments have been received in relation to railway capacity also. Proposed increases to Railway Capacity are set out in the Council's Infrastructure Delivery Plan. This includes, amongst other things, notable journey time improvements and 55% more seats in the morning peak across the Liverpool Street line as part of the £1.4bn investment by the current franchise holder Abellio Greater Anglia.	
Comments have also been received in relation to car parking capacity within Billericay High Street and at the station. The Essex Parking Standards - Design & Good Practice (2009) is considered	

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that reference should be made to multiuser routes within policy T1 to ensure the

needs of disabled people and

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		appropriate in the Borough because they promote minimum requirements for parking for residential developments, but maximum requirements for parking in non-residential areas which is consistent with the NPPF which supports sustainable travel modes. However, the Vehicle Parking Capacity and Intervention Study recognises that there is parking congestion in this location and therefore the policies in this plan protect town centre and station car parking in such instances.
		With regard to the Radford Way car park, there is no policy in the plan proposing development on the Car park, only amending the boundary of Radford Way employment area to include the car park on Radford Crescent. Sufficient protection will be provided by Policy T9 Parking provision within employment areas once the employment area boundary has been amended. However removing the proposed boundary change would leave the car park susceptible to a planning application for residential or

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		employment development and will not be protected by policy T9.
		Amendments were sought to policy T1 in relation to school and GP capacity. These matters are not relevant to policy T1, and no amendments are supported in this regard.
		Details of how infrastructure will be expanded to meet the additional demands of the increased population is contained in the Council's Infrastructure Delivery Plan. This contains details on power, water supply & flood defences, health & social care, education, highways, public transport, open space & outdoor sport, superfast broadband, emergency services, and is a living document that will be updated throughout the lifetime of the Council's Local Plan to ensure the most appropriate infrastructure upgrades are delivered to support growth.
		A developer has provided comments in relation to site at land north of Wash

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		Road. The Whole Plan Viability Study has looked at various levels of development in this part of the Borough and determined that the proposed development in this area when subjected to the financial requirements of policies in the Plan such as policy T1, was still viable. In the absence of any other evidence to support the claim that the provision of infrastructure as set out in policy requirements of the plan will be unviable without the inclusion of land north of Wash Road, there is no need to make a modification. The Transport Strategy Policy T1 states that during the plan period, the Council will seek to deliver improved accessibility to jobs, services and facilities via an enhanced and better integrated transport network, which will be achieved by, amongst other things, working in partnership with public transport providers and Network Rail to develop better links, access and capacity for the
		railways and bus network.

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		Comments have been made in regards to lack of local employment and potential congestion. It is recognised that it is desirable to align job growth and housing growth to reduce commuting. However, the economic development evidence base was unable to identify additional suitable sites for new employment development within Billericay. The nearby A127 Enterprise Corridor is however a suitable location, and policy T4 sets out proposals for increasing accessibility to this corridor by public transport to assist in reducing congestion on the road network. The Local Plan however seeks to protect existing employment areas in the Borough including Radford Way Business Park, Billericay and rural enterprise sites in Billericay at Guildprime Business Park and Barleylands Depot. This is consistent with the advice set out in the ELPS, EDNA and ED Topic Paper.
		Comments were made in relation to reducing housing numbers. Simply reducing housing numbers does not

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		make development proposals more sustainable, nor does it reduce the propensity to travel via the private car. The increase in population will result in additional travel movements whether the houses are built or not, however, if we are to provide the next generation with the opportunity of having a home of their own, this represents an opportunity to improve the use of more sustainable forms of travel, and Policy T1 supports this. Sustainable transport measures such as walking, cycling, public transport, car sharing clubs etc. will form part of required mitigation to the road network on all new housing proposals. Transport Statements and Assessments will be required to be submitted as part of each planning application (those which result in significant transport movements at least) and it will be up to the developer to demonstrate how they will promote the use of sustainable modes of transport as part of their proposal. If this is not considered to be satisfactory, then the application for development will be refused. Recent

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		housing development schemes in Essex have included providing new bus services and a free bus pass for one year to all new residents as a measure for encouraging behavioural change in travel choices for example.
Paragraphs 9.27 – 9.37 Policy T2: Improvements to Carriageway Infrastructure	 Objection: There is no evidence to demonstrate that the sites proposed for allocation in the Wickford area cannot be delivered without the Grade separated junction on the A127. (Redcoombe Ltd RPLP/1314). There does not appear to be a date for the delivery of the grade separated junction and ECC have no commitment to deliver the junction, as it does not form a proposal within the Essex Local Transport Plan (2011). (Redcoombe Ltd RPLP/1314). A potential cost for the scheme has also not been given and the position with regards to development contributions is unclear. (Redcoombe Ltd RPLP/1314). Suggestion that development in H15 would have a minimal impact on the Nevendon Interchange and questions the benefit suggested in the HIA as the new interchange on the A127 would likely provide local development access only and not provide a new main route between Basildon and Wickford town centres. Therefore, contributions should not be sought from the development at H15. (Redcoombe Ltd RPLP/1314). 	ECC have suggested modifications and paragraphs 9.27 - 9.37 should be amended for consistency to ensure the requisite highway and transport requirements identified in the Publication THIA 2018 and Addendum are incorporated within the Plan document. ECC have also requested changes in relating to the Air Quality Action Plan project. These changes are accepted and the plan will be updated as appropriate to reference the work. Organisations have commented on the Wickford sites, the need for the grade separated junction on the A127 and suggested a modification. The proposed modification is not supported by the transport evidence which supports the

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	 The Billericay Road network is extremely sensitive to change and proof needs to be provided for the proposed relief road. (Billericay Action Group RPLP/1140). The one-way section of Norsey Road has been trialled and abandoned and the widening of Western Road would adversely impact upon the takeaways due to loss of parking. (Billericay Action Group RPLP/1140). The town is short of parking, with more parking to be lost at Radford Crescent. (Billericay Action Group RPLP/1140). Increases in traffic will not be able to be offset with increases in sustainable travel such as cycling. (Billericay Action Group RPLP/1140). Policy T2 and section 9.27 is not sound or effective. The scope for improving A127 is limited and would be unable to accommodate forecast growth. The plan suggests that the A127 will be widened in accordance with the A127 Corridor For Growth: An Economic Plan, however, this document does not confirm that widening of the A127 is a viable option. It is likely that cost would prohibit this from happening and therefore the three junction improvements that are in the pipeline would do nothing more than maintain a stand-still position to offset natural growth and will not deliver any improvement. (Dunton Community Association RPLP/1979). Concerned with traffic congestion in Billericay for commuters to Basildon and surrounds. 	Revised Publication Local Plan. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes including the grade separated junction on the A127 which are proven to alleviate the impact of growth on the highway network in this part of the Borough. The impact of the new junction would not only alleviate congestion at the Nevendon junction but also all junctions through the centre of Wickford and junctions to the east of Basildon. The link roads associated with the new junction from Cranfield Park Road / Tresco Way in Wickford and to Courtauld Road and the A127 corridor in Basildon would in fact provide an alternative route between the Basildon & Wickford town centres and is proven to alleviate congestion on junctions in the centre of Wickford, which site H15 would undoubtedly contribute to. Therefore, it is reasonable to assume that contributions should be made

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	 Fortune of War roundabout needs to be remodelled to improve both traffic flow and air quality. The proposed Billericay Relief Road is not an effective mitigation solution. The route should be continued further north joining Rosebay Avenue at the corner of Hannakins Farm close to the junction with Mallow Gardens. Trains from Billericay are crowded at busy periods. The new relief road connects to Frithwood lane which has very limited capacity to be expanded and due to lack of adequate footpaths resorts to walking in the road, and potential issues for cyclists, horse riders, dog walkers and other pedestrians trying to access the local woods. In Billericay five junctions are already at capacity before the construction of 3000+ houses. Few job opportunities in the area will result in additional commuting facing junctions with gridlock. Other comment/s: The references to the major highway and transportation schemes are welcomed however the text and headings should be reviewed to ensure they are consistent with the findings of 	towards the grade separated junction as this is proven to be the most effective solution to ensuring that the impact of growth in the Wickford and east Basildon area does not result in a 'severe' impact on the highway network. With regard to the Radford Way car park, there is no policy in the plan proposing development on the Car park, only amending the boundary of Radford Way employment area to include the car park on Radford Crescent. Sufficient protection will be provided by Policy T9 Parking provision within employment areas once the employment area boundary has been amended. However removing the proposed boundary change would leave the car park susceptible to a planning application for residential or employment development and will not be protected by policy T9.
	 the Publication THIA 2018 and Addendum. (Essex County Council RPLP/1740). The reference to the major highway and transportation improvement schemes is welcomed, however it should be 	A number of comments have been received in relation to the proposed relief road and the logistics of other highway

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	recognised that these schemes include and form part of a range of transport packages including sustainable transport and public transport. (Essex County Council RPLP/1741). • The references to air quality are noted, however should be updated to reflect the ongoing work between BBC and ECC in response to the UK Air Quality Action Plan for Nitrogen Dioxide (2017). (Essex County Council RPLP/1743). • Paragraph 9.32 should be updated to reflect the outcomes and findings of the Publication THIA 2018 and Addendum 2018, incorporating the Sustainable transport mitigation measures. (Essex County Council RPLP/1745). • Paragraph 9.32 should be amended to ensure sites in Wickford (especially H15) are not contingent on the delivery of the junction. (Redcoombe Ltd RPLP/1314). Modification/s requested: • Review paragraphs 9.27 - 9.37 for consistency to ensure the requisite highway and transport requirements identified in the Publication THIA 2018 and Addendum are incorporated within the Plan document. (Essex County Council RPLP/1740). • Ensure that the requisite sustainable transport and public transport mitigation identified within section 9 of the Publication THIA 2018 and Addendum are incorporated within the Plan document. (Essex County Council RPLP/1741). • BBC to work with ECC to reflect the latest position. This should be updated elsewhere within the Plan document as	improvements within Billericay. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes including the Billericay Western Relief Road, which are proven to alleviate the impact of growth on the highway network in this part of the Borough. Essex County Council, as the Highway Authority have been a joint partner in the commissioning of this work and have sufficient highway land under their control to ensure the required expansion of Frithwood Lane is delivered. The further extension of the relief road is not currently justified with the amount of growth in the RPLP. Comments relating to the Fortune of War roundabout and potential changes were also received. A feasibility / options assessment is currently being carried out by Essex County Council as the highway authority for the Fortune of War junction. This aims to identify a potential solution

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	 appropriate to the Air Quality Action Plan project. (Essex County Council RPLP/1743). Amend paragraph 9.32 as suggested to reflect the outcomes and findings of the Publication THIA 2018 and Addendum 2018, incorporating the Sustainable transport mitigation measures. (Essex County Council RPLP/1745). Paragraph 9.32 should be amended to ensure sites in Wickford (especially H15) are not contingent on the delivery of the junction. (Redcoombe Ltd RPLP/1314). Consider the impact of growth on traffic. Remodel the Fortune of War roundabout to improve both traffic flow and air quality. Provide a relief road which will effectively mitigate the growth proposed. Increase railway capacity. Extend the relief road further. Do not expand Frithwood Lane as it only has limited capacity. Additional road improvements needed. Provide sufficient employment opportunities. 	to the traffic flow and air quality issues experienced at the moment. At the time of undertaking the transport modelling for the Local Plan, a final scheme was not available or sufficiently progressed to be specifically tested. The Council is aware that work is being carried out to come up with a scheme improvement for this junction and policy restrictions are placed on potential housing development sites in the vicinity of this junction until such time as the air quality issue in this area is within statutory limits. However, such potential scheme improvements could be added to the Council's Infrastructure Delivery Plan (IDP) so that every option is considered for the potential funding of such a scheme. Comments have been received in relation to railway capacity also. Proposed increases to Railway Capacity are set out in the Council's Infrastructure Delivery Plan. This includes, amongst other things, notable journey time improvements and 55% more seats in the morning peak across the Liverpool

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		Street line as part of the £1.4bn investment by the current franchise holder Abellio Greater Anglia.
		Comments have been made in regards to lack of local employment and commuting issues. It is recognised that it is desirable to align job growth and housing growth to reduce commuting. However, the economic development evidence base was unable to identify additional suitable sites for new employment development within Billericay. The nearby A127 Enterprise Corridor is however a suitable location, and policy T4 sets out proposals for increasing accessibility to this corridor by public transport to assist in reducing congestion on the road network. The Local Plan however seeks to protect existing employment areas in the Borough including Radford Way Business Park, Billericay and rural enterprise sites in Billericay at Guildprime Business Park and Barleylands Depot. This is consistent

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		with the advice set out in the ELPS, EDNA and ED Topic Paper.
Policy T2: Improvements to Carriageway Infrastructure	 Support: Recognise strategic importance of A127 in serving south Essex. (Rochford District Council RPLP/1654). Improvements to Fortune of War supported in principle. (Rochford District Council RPLP/1654). The Council is keen to continue discussions with the Borough Council as part of the Duty to Co-operate so that such proposals may evolve through the JSP or review of the Basildon Local Plan once adopted. (Rochford District Council RPLP/1654). Objection: There is no reference to the North - South link road from the new grade separated junction on A127. (Essex County Council RPLP/1746). The title of this section incorrectly refers to Carriageway Infrastructure which is an incorrect use of terminology and does not reflect the full range of infrastructure requirements as set out in this section, which extend beyond the carriageway. This update should be applied throughout the document. (Essex County Council RPLP/1739). The site allocations of particular interest to CCC are those close to the authority's boundary which may have a cumulative impact on traffic. These include growth around Wickford and to 	ECC have raised comments on the lack of reference to the north – south link road in the Bowers Gifford area, as well as a suggestion to amendment the title of policy T2 to state highway instead of carriageway. These amendments are supported by the Council for purposes of clarity. Essex Bridleways Association seek clarification to be provided within the relevant policies that the relief road route should be designed as a multi-user road. This amendment is supported by the Council for purposes of clarity. Chelmsford Council have sought assurance that growth in Billericay and Wickford will not have a negative impact on key transport connections between the authorities and that Transport Assessments/Statements should be prepared. The Council accept that this is a reasonable request that would be

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	 the north of Potash Road in Billericay. CCC seek assurance that growth in Billericay and Wickford will not have a negative impact on key transport connections between the authorities particularly through Stock and the A130 and A132 routes. (Chelmsford City Council RPLP/1644). Concerned with the fact that the highway mitigation schemes are minimum requirements is not correct with reference to the grade separated junction on the A127. This junction has been chosen as it offers significant benefit over lesser, cheaper schemes. This is fine if the level of contribution sought is proportionate to the impact of development and does not create betterment. Therefore the Council should safeguard the alternative option of the Morbec Spur and widening of A132 northbound in case the junction is not delivered within the required timeframe. (Gleeson Developments/Avant Homes RPLP/1345). Billericay relief road should be a full multi-user road for pedestrians, cyclists, equestrians and the disabled to ensure that access is available to all. (Essex Bridleways Association RPLP/356). The Billericay Road network is extremely sensitive to change and proof needs to be provided for the proposed relief road. (Billericay Action Group RPLP/1144). If the Relief Road is required before development takes place then it should be delivered before any houses are built. If the 	expected as part of any development proposal and will therefore add the extra wording to provide greater clarification in the plan. Developers have commented on the A127 grade separated junction and alternative options. It is reasonable to anticipate that local improvements to the highway network will need to be provided over and above the mitigation options contained in the HIA in order to make development proposals acceptable in planning terms. The IDP does not specifically state that the Morbec Spur and A132 widening would successfully mitigate the impact of development. The Council is therefore unwilling to accept a sub-standard mitigation option that would knowingly cause harm to the resilience of the highway network within the plan period. The HIA is also clear that this option would be unsuccessful as a mitigation option as junctions within Wickford and Basildon would remain over capacity to unsatisfactory levels. However the IDP could be re-worded to

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	 relief road is unsound, no development should take place in SW Billericay. (Billericay Action Group RPLP/1144). The relief road is suggested to provide benefit to Sun Corner by diverting traffic heading towards Brentwood away from this junction. However, based on unquantified local knowledge, only a modest proportion of traffic uses this route and there has been no attempt to quantify this. (Billericay Action Group RPLP/1144). A previous study concluded that the removal of the one-way restriction on Laindon Road would be as effective as the relief road, however this has not been included in the current version of the plan. (Billericay Action Group RPLP/1144). The relief road is a weak idea that taken forward with little evidence by build at all cost planners. (Billericay Action Group RPLP/1144). The relief road will create undesirable new route options redistributing traffic in unpredictable ways. (Billericay Action Group RPLP/1144). Concerned that the relief road in Billericay does not provide sufficient congestion relief to justify the cost or the impact to landscape and Green Belt. (Billericay Town Council RPLP/1911). There are issues with delivering the relief road in its current configuration. Therefore a wider by-pass should be considered instead following the route in the previous March 2018 iteration of the plan. This would better serve the town and the proposed 	ensure in term separaterm be as such funding ensure development. Common consult A127, within route, safegumeant only so in this have sall long point the Boroug with all to give to bid in Growth.

ensure that it is clear in this regard, and in terms of the recognition that the grade separated junction will also have longer term benefits beyond the plan period and as such the Council will work to secure funding to assist its delivery, in order to ensure that contributions from development are reasonable and proportionate.

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ments have been made by various ultees relating to the widening of the . Widening of the A127 features the long-term proposals for the and requires land to be juarded for such purposes in the ntime, but this may not represent the solution to future congestion issues s area. It is also not necessary to secured the necessary funding for ng-term mitigation schemes at the the plan is adopted. Basildon ugh Council has signed an MoU all Council's along the A127 corridor re themselves the best opportunity for funding, the A127 Corridor for th Economic Plan is currently being

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	 development and would allow the land surrounding this route to be better utilised for mixed use purposes in connection with the town and the allocations in south west Billericay. (Smith and Mence RPLP/1490). The proposed relief road in Billericay would blight residents of Frithwood Lane. It would be narrow causing potential accident spots and multiple rat runs through south west Billericay. No evidence the relief road would ease congestion and would be insufficient to alleviate highway network. Concerned that the Billericay relief road will cause additional traffic problems, increase pollution and adversely impact residents' of Frithwood Lane quality of life. The Billericay Relief Road will not relieve traffic issues and will just move the congestion to a different part of the town. The Billericay relief road will only serve the new development, not the congested high street, and it is difficult to find a parking space. Billericay relief road is flawed. Frithwood Lane is too narrow and a negative impact on residents would occur in terms of pollution and safety. The relief road would cause additional congestion, with more traffic in residential areas. Analysis of road traffic impact is fundamentally flawed as the benefits of the Relief Road are unclear and no road improvements planned for the north of the town. 	updated to support subsequent funding bids and an A127 taskforce, made up of politicians and senior Council officers has been set up to facilitate the delivery of future alleviation schemes for the route, which may or may not include potential widening. Rochford Council raised comments with regards to the new grade separated junction on the A127 no longer extending into their Borough. The new grade separated junction on the A127 was previously explored as a 3 phase scheme which extended from the Pound Lane junction to the north east in Shotgate, connecting to the A129 and the A130 respectively. The modelling results from the HIA Part 1 report illustrate that traffic diverted onto the new link at Pound Lane from the A130 resulted in 'rat running' through east Basildon and the town centre causing local congestion issues, rather than using the strategic highway network connection from the A130 to the A13, providing no benefit to the highway

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	 The Billericay relief road is counterproductive and insufficient thought has been given to traffic flows. The Billericay relief road is counter-productive. It may relieve Sun Corner but would increase congestion on other parts of the network. A relief road starting at Dunton Wayletts on the A127 would represent a better alternative. Billericay Relief road is not sound. It will cause damage to green belt, wildlife and increase noise and air pollution. The Highways Agency report states that the Billericay relief road will not help with congestion and will simply move traffic from one junction to another. Frithwood Lane is an obvious choke point and will not be able to handle increased traffic. The Billericay relief road will only offer opportunities for increased traffic to/from Brentwood into the Borough. Nothing has been planned to alleviate central and northern Billericay. The Billericay relief road will not improve the journey to any of the proposed employment sites proposed in the Borough nor relieve traffic at Sun Corner as this traffic is heading north to Chelmsford. The section of the relief road at Frithwood is a concern due to the narrow lane and the fact that recreational open space will be severed from the town. Billericay Relief Road will create extra demand and not solve the problem. Frithwood Lane is very narrow and concerned larger vehicles will not be able to pass safely. 	network and junctions located within the Basildon area. Therefore, this option has only been taken forward in the latest version of the Basildon Revised Publication Local Plan with the phase 1 link only. The scheme is still subject to design, detailed junction modelling and it is assumed that any new junction would be built 'fit for purpose' to accommodate future traffic growth. Basildon Borough Council will continue to work with Rochford Council as part of the Duty to Co-operate so that an alternative proposal could be developed through the JSP or review of the Basildon Local Plan once adopted. The proposed new Grade Separated Junction on the A127 has been subject to consultation as part of the Draft Local Plan 2016 and the Revised Publication Local Plan 2018. The Highway Mitigation Options were also tested against a variety of scenarios including different levels of development and in different areas of the Borough. The proposed link road from the new junction to Cranfield

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	 Billericay Relief Road will not be suitable for increase in number of cars, will be unsafe and will increase levels of traffic. No sound justification for the Billericay relief road. In August 2014 Essex Highways carried out a traffic survey which stated that the link road offered no further congestion relief than the removal of one-way restriction on Laindon Road. Therefore, it is not needed and incorporates a section of Frithwood which is too narrow to accommodate the road. Billericay relief road will not solve gridlock problem of traffic through Billericay towards the A12 or to Chelmsford. The relief route will create additional rat runs and congestion and the impact of the growing football club has not been taken into consideration. Insufficient thought has been given to the Billericay relief road around the Frithwood area. It will create rat run on Tye Common and is in the wrong place. Concern about air pollution. South west relief road is ineffective and counterproductive and the homes should be spread throughout the Borough rather than loaded in Billericay. Billericay Relief Road is not justified, will reduce Green Belt and will detrimentally affect quality of life. Find alternative route which does not affect ancient green belt woodland and habitats. 	Park Road/Tresco Way would connect the existing road network from Bowers Gifford to Wickford in the north, but this connection would not in of itself result in a built up area between the two settlements creating coalescence. The creation of a road on its own does not result in the perception that the two settlements are merging into one. A comment has been made with regards to the delivery of the A127 junction improvements alongside the works at the Fairglen interchange. The Junction will need to be carefully phased so that it does not cause a conflict with the delivery of the proposed Fairglen improvement scheme, but this is possible within the plan period. Comments have been made in relation to the A127 grade separated junction. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements

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	 Traffic surveys are based on current patterns and do not take into account that Ford is reducing the need for Dunton buildings where soon to be obsolete diesel engines are designed. This will reduce traffic congestion which is providing justification for Billericay Relief Road. Concerned with the level of congestion on the highway network in Billericay and whilst the proposed relief road will move traffic from the town centre, it will create additional traffic problems in the Tye Common Road / Frithwood Lane area. There is considerable concern about the need for the Billericay relief road and whether it will cause increased congestion in other parts of the town. Impact of housing on infrastructure needs to be better explained. A more even balance of housing and employment and maintaining adequate infrastructure is required if the plan is to be found sound. The capacity of the A127 will need to be increased significantly to cope with extra housing growth in the Basildon Borough and across South Essex. Norsey Road part one-way proposal has been trialled before and didn't have expected effect. The Billericay District Residents Association has commissioned an independent traffic analysis report which disputes the findings of the study which informed the Draft Local Plan 2016. The new report looks at a 60% increase in development for Billericay indicating the report is invalid. 	and highway mitigation schemes including the grade separated junction on the A127 which are proven to alleviate the impact of growth on the highway network in this part of the Borough. The impact of the new junction would not only alleviate congestion at the Nevendon junction but also all junctions through the centre of Wickford and junctions to the east of Basildon. The link roads associated with the new junction from Cranfield Park Road / Tresco Way in Wickford and to Courtauld Road and the A127 corridor in Basildon is proven to alleviate congestion on junctions in the centre of Wickford, which site H12 would undoubtedly contribute to. Therefore, it is reasonable to assume that contributions should be made towards the grade separated junction as this is proven to be the most effective solution to ensuring that the impact of growth in the Wickford and east Basildon area does not result in a 'severe' impact on the highway network.

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	 No proper traffic surveys have been carried out, with cameras installed for less than 24 hours in 2017. Highway mitigation solutions will not alleviate traffic congestion and no roads can be widened. Traffic surveys were carried out during school holidays and question their worth. Frithwood Lane is narrow and there is not adequate space to widen road without removing houses or gardens. Tye Common and First Avenue would become rat-runs. Roads in Billericay are inadequate to cope with additional growth and congestion. Concern that the hump back bridge on Mountnessing Road will not be able to accommodate additional traffic. Billericay's roads are rural in nature and difficult to modify. The A129/Mountnessing Road junction will be three times the acceptable capacity negating the positive impact of other highway improvements. Traffic lights at Sun Corner will restrict traffic flow. Additional concerns with traffic congestion increasing on A127 and A13. Concerned with traffic congestion in Noak Bridge given that the main access to the A127 for development in Billericay, Barn Hall Wickford, Crays Hill and Noak Bridge will use this access. This will add to the congestion and pollution experienced in this area. 	Concern has been raised over the Mountnessing Road bridge. Basildon Borough Council, in partnership with Essex County Council as the Highway Authority commissioned Ringway Jacobs to carry out extensive modelling of the highway network in the Basildon Borough to determine the potential impact of future traffic growth. This has identified a number of potential areas of the road network in Billericay that would either need to be improved, or where new infrastructure would need to be provided in order to alleviate potential traffic congestion that would occur in the future. The highway engineers that assisted in the completion of the assessment have significant knowledge of the local road network and have never considered the hump back bridge on Mountnessing Road to cause an issue when looking at the impact of future growth in the Billericay area. A substantial number of the objections in relation to policy T2 relate to the proposal for a Relief Route which would

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	 The narrowness of roads in south west Billericay represent a danger to pedestrians at current traffic levels. The Plan states that a grade separated junction is required to serve development to the east of Basildon (E6 & H11) and in Wickford (H12, H13, H14 and H15). There is no evidence to support the requirement for a new A127 junction for access to H12. (Pigeon (Wickford) Ltd RPLP/2233). Policy T2 is not sound nor is it effective. The grade separated junction to serve development to the east of Basildon and around Wickford is required as a pre-requisite of the delivery of these sites in advance of development and not alongside it. This approach could jeopardise delivery of a substantial element of housing and employment within the plan. It is therefore imperative that the Council works with partner agencies to fund and deliver the junction in order to facilitate development in this area. (Wick 3 Nominees Ltd RPLP/1930 and RPLP/1960, Persimmon Homes RPLP/2059). Concerns with other junction mitigations and the potential impact on the road network in Billericay. (Billericay Action Group RPLP/1144). It is understood that the study of traffic impact did not take into consideration growth in other Boroughs or growth in other settlements in the Basildon Borough. (Billericay Action Group RPLP/1144). 	serve to relieve traffic congestion in the town centre whilst also providing access to the new development sites, which will further relieve the town centre of additional congestion. The proposed Relief Road is proven to effectively mitigate the impact of proposed growth in Billericay as evidenced by the Transport and Highway Impact Assessment and Addendum. The relief road will take traffic from the A129/A176 away from the town centre and is accompanied by several improvements to other junctions across Billericay including Sun Corner. The proposals are sufficiently detailed for the Local Plan. The public will be informed and consulted on the full scheme design of the relief road once known at a later stage in the planning process. A number of comments were also raised relating to the one-way restriction at Laindon Road. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of

destination data and only looks at travel to work stats. (Billericay Action Group RPLP/1144). The transport modelling needs to be stress tested to see if any of the development sites around Wickford or to the east of Basildon can be delivered before the new junction. (Wick 3 Nominees Ltd RPLP/1930 and RPLP/1960, Persimmon Homes RPLP/2059). Road network is choked at peak times and the relief road and	a top a post of a trace of the Depth land
 The amount of housing proposed in Billericay is now double the worst scenario forecast in this study. (Billericay Action Group RPLP/1144). Pell Frischmann were commissioned with facilitating the doubling of the number of houses in SW Billericay. (Billericay Action Group RPLP/1144). CRPE is opposed to the housing sites to the west of Billericay on environmental and Green Belt grounds, and the proposed relief road would have a detrimental impact on the openness of the countryside. (CPREssex RPLP/1877). Concerned with relocation of sports facilities and open space provision. (Billericay Action Group RPLP/1144). Concerned with the extensive list of carriageway infrastructure set out in Policy T2 and the lack of clarity on whether these will substitute the substitute of t	e transport network in the Basildon brough and proposes several junction aprovements and highway mitigation whemes including the Billericay Western elief Road, which are proven to eviate the impact of growth on the ghway network in this part of the brough. This also includes the removal the one-way restriction on Laindon and in combination with the Relief and. Evidence does not rely on burney to work data and is derived from a treyed traffic counts at junctions. As the traffic flows are therefore considered abe adequately mitigated, there is no seed to reduce the housing allocations. With regards to the Green Belt and and acape impact, this has been arefully considered with regards to evious Local Plan consultation sponses, where infrastructure clearly and out as the most important issue for the Borough and the Council's absequent decision to produce an frastructure led plan reflects this.

be funded by S106 or CIL. (Martin Grant Homes (UK) Ltd

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	 In relation to the Council working with SELEP, ECC and developers to secure improvements alongside development, further evidence is needed to ensure the policy is justified and therefore sound. (Martin Grant Homes (UK) Ltd RPLP/1778). Billericay is an historic town that has outgrown its highways network, with very little space for it to be improved. There is an over reliance on sustainable transport measures to mitigate traffic impact, that are subject to feasibility and for which no evidence of usage rates has been provided. Baseline traffic data is taken from 2014 and is therefore out of date. Evidence relies on journey to work data and not origin-destination data which misses several journeys on the network. Congestion and traffic is reassigned from the town centre to residential areas. One way at Norsey Road has previously been trialled and abandoned, widening of Western Road will result in parking on pavement for takeaways. Modelling should be redone without Laindon Road two-way. (Billericay Town Council RPLP/1911). Consideration needs to be given to viability and cash flow of expecting major infrastructure of this type to be forward funded through development that would be precluded by Policy from implementation until this infrastructure is delivered. (Wick 3 Nominees Ltd RPLP/1930 and RPLP/1960, Persimmon Homes RPLP/2059). The Council also needs to commit to forward funding the junction to bring it forward earlier in the plan period. (Wick 3 	Comments were made in relation to the various traffic surveys that form the evidence base and their effectiveness. Traffic surveys have been carried out in May 2011, October 2014, February 2016, November 2016 and either uplifted or reduced to reflect a 2014 base year before forecasting began. This is in accordance with the requirements of the NPPF 'Transport Evidence bases in Plan Making and Decision Taking' guidance and accurately reflects the Plan period 2014-2034. Sustainable transport measures such as walking, cycling, public transport, car sharing clubs etc. will form part of required mitigation to the road network. No traffic analysis report has been received by the Council in support of the representation claiming that the findings of the study in 2016 has been disputed. The assessment commissioned by the Council considered various scenarios including levels of development over and above the proposed total housing figures for Billericay in the RPLP. In addition, an

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	 Nominees Ltd RPLP/1930 and RPLP/1960, Persimmon Homes RPLP/2059). The Council needs to be clearer as to the mechanism for securing funding from developments. (Wick 3 Nominees Ltd RPLP/1930 and RPLP/1960, Persimmon Homes RPLP/2059). The need to conserve and enhance the historic environment is not mentioned in supporting text or policy T2. Additional criterion and mention is supporting text is required. Only where harm to the historic environment can be avoided should mitigation measures be considered. (Historic England RPLP/2151). The plan is legally unsound because it ignores community engagement regarding the new junction on the A127 and the coalescence it would create between Wickford and Bowers Gifford. (Cllr Jackman RPLP/1368). No consultation on the plan in its current form. (Cllr Jackman RPLP/1368). Wickford's highway infrastructure is at or near capacity and increased levels of traffic will reduce air quality. (Cllr Jackman RPLP/1368). Phasing of the new junction will mean that it competes with Fairglen improvement scheme. (Cllr Jackman RPLP/1368). The Dunton Garden Village should be re-introduced to the plan as an alternative as this has existing infrastructure that can cope with the growth. (Cllr Jackman RPLP/1368). 	Addendum to the transport modelling has been produced to accurately reflect the exact number of dwellings proposed in the RPLP. This provides sufficient evidence to justify the inclusion of the relief road proposal. Comments have been made in relation to highway access in Wickford. Policy T2 clearly states that the new grade separated junction will be connected into Wickford including a link road to either Cranfield Park Road or Tresco Way with the exact location of the link indicative at this stage. The THIA 2018 report clearly states that the new grade separated junction on the A127 is required to alleviate traffic congestion to the east of Basildon and throughout Wickford given the significant congestion improvements it provides to junctions through the centre of Wickford. As site H12 will undoubtedly contribute to the traffic movements through the centre of Wickford, the junction is required to serve H12 along with development proposals E6, H11, H13, H14 and H15

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	 Policy T2 is too imprecise on which development sites will have to contribute to which improvement schemes, leaving uncertainty for developers and the Council. (Pigeon (Wickford) Ltd RPLP/2233). CIL money better spent on other infrastructure. Policy T1, T2 and T5 appear to identify that there are resources available to support development of strategic transport infrastructure. This is understood not to be the case and that improvements to highway infrastructure will need to be funded by developers. (Dale Farm Residents Group RPLP/3207, The Gypsy Council RPLP/3208). Housing development proposals in Billericay have not been selected on the basis of policy requirements T1 (a), which calls for new development to minimise the need to travel and calls for alternatives to the private car, T1 (d) which calls for measures for behavioural changes in travel choices, or the NPPF which suggests that development should be located near sustainable transport modes. Lack of employment land in Billericay will inevitably result in increases in commuting, however, the railway to Liverpool Street is already at capacity. Funding should be identified for the widening of the A127 in order for the plan to be found sound. Only build first-time buyer's houses on brownfield sites should be built and a full bypass provided with a railway crossing. Local Plans should include improved parking in town centres. 	as stated in paragraph 9.32 of the Revised Publication Local Plan. Whilst it is recognised that the THIA report considers that some development may be able to take place prior to the delivery of the junction, this is not true of the entire H12 development proposal and therefore it is reliant on the provision of the new grade separated junction on the A127 to be delivered in its entirety. Traffic surveys have been carried out in accordance with the requirements of the NPPF 'Transport Evidence bases in Plan Making and Decision Taking' and forecasted for the plan period 2014-2034. This should take account of any anomalies over the extended 20 year period. The proposed modification to Policy T2 4 provides additional clarification as to the responsibility of the developer and is a reasonable change. Comments have been made in relation to air quality concerns. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive

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	 No change to number of jobs in the plan so people will commute outside the district. London routes via railway are congested in peak times. Crossrail will not help. No improvements planned to the north of the town. House prices in Frithwood Lane would be negatively affected. The road seems to go through a number of sporting facilities and existing properties which is not mentioned in the plan. No evidence has been provided in relation to infrastructure. Specifically the ability of Billericay's roads to service new development. Previous study looked at 1,770 new homes not 2,700. Infrastructure problems such as primary school provision, utilities, parking, shopping and healthcare need to be resolved. Building in this area will lose farmland and countryside. Unjustified use of Green Belt land and no consultation on increase in housing. Countryside lost, issues moving sports facilities, no infrastructure, high risk of flooding, adverse impact on wildlife. No proper consultation on the relief road. Consultation should have been carried out in accordance with the Council's SCI. Other comment/s: 	modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes including the Billericay Western Relief Road, which are proven to alleviate the impact of growth on the highway network in this part of the Borough. Also, there is no air quality issue that are envisaged to occur as a result of the additional traffic as this has been adequately mitigated to ensure traffic flows without the stop/start congestion issues which cause problems with air quality. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes including the Billericay Western Relief Road, which are proven to alleviate the impact of growth on the highway network in this part of the Borough. Details of how infrastructure will be expanded to meet the additional demands of the

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	 CCC requests additional wording within the Local Plan regarding Transport Assessments/Statements to be prepared. (Chelmsford City Council RPLP/1644). It is noted that the new junction on the A127 no longer identifies a route to the A130 at the western extend of Rochford District. (Rochford District Council RPLP/1654). Modification/s requested: Change the title of this policy T2 to read: Improvements to Carriageway Highway Infrastructure. This change should be applied throughout the document. (Essex County Council RPLP/1739). Suggested wording changes to part 1. f) of policy T2. (Essex County Council RPLP/1746). CCC requests additional wording within the Local Plan regarding Transport Assessments/Statements to be prepared. (Chelmsford City Council RPLP/1644). Suggested wording changes to policy SD2 and supporting text. (Gleeson Developments/Avant Homes RPLP/1345). Billericay relief road should be a full multi-user road for pedestrians, cyclists, equestrians and the disabled to ensure that access is available to all. (Essex Bridleways Association RPLP/356). Amend policy T2 and supporting text or policy T2 to reference the need to conserve and enhance the historic environment. Only where harm to the historic environment can be avoided 	increased population is contained in the Council's Infrastructure Delivery Plan. This contains details on power, water supply & flood defences, health & social care, education, highways, public transport, open space & outdoor sport, superfast broadband, emergency services, and is a living document that will be updated throughout the lifetime of the Council's Local Plan to ensure the most appropriate infrastructure upgrades are delivered to support growth. It is recognised that it is desirable to align job growth and housing growth to reduce commuting. However, the economic development evidence base was unable to identify additional suitable sites for new employment development within Billericay. The nearby A127 Enterprise Corridor is however a suitable location, and policy T4 sets out proposals for increasing accessibility to this corridor by public transport to assist in reducing congestion on the road network. The Local Plan however seeks to protect existing employment areas in the Borough including Radford Way

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	 should mitigation measures be considered. (Historic England RPLP/2151). Re-introduce Dunton Garden Village into the plan. (Cllr Jackman RPLP/1368). The Location of the junction should be reconsidered further west of the proposal to minimise traffic into residential areas. (Cllr Jackman RPLP/1368). Should consider options arising from the consultation response such as better utilisation of existing a127 access. (Cllr Jackman RPLP/1368). A wider bypass should be considered as an alternative to the relief road alignment. (Smith and Mence RPLP/1490). Reconsider whether the harm to the Green Belt and landscape is outweighed by the benefits of the relief road. If traffic flows cannot be adequately mitigated, then housing allocations must be reduced accordingly. (Billericay Town Council RPLP/1911). Produce an integrated highways improvement package and masterplan for Billericay as a part of the local plan which includes sustainable transport measures. (Billericay Town Council RPLP/1911). The relief road must be designed and tested to ensure that it is deliverable and that congestion will not be caused at pinch points along its route. Residents should be consulted during the design phase - particularly those who will be most impacted in the Frith Wood Lane/Tye Common Road Area. (Billericay Town Council RPLP/1911). 	Business Park, Billericay and rural enterprise sites in Billericay at Guildprime Business Park and Barleylands Depot. This is consistent with the advice set out in the ELPS, EDNA and ED Topic Paper. It is acknowledged that some of the infrastructure improvements identified in the Revised Publication Local Plan cannot be funded by development alone and will require external funding through such means as DfT/SELEP etc. The Council will identify a funding and delivery strategy in order to show that there is a reasonable prospect of these infrastructure improvements coming forward alongside development within the plan period. Concern was raised in relation to sufficient infrastructure being provided. The development proposal to the south west of Billericay will provide a new primary school, GP hub, local centre and other infrastructure as set out in the

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	 Extend the Basildon Cycle Action Plan to include cycle and bridleways within the new development areas and identify the route of the segregated parts where the relief road narrows at policy area H17. (Billericay Town Council RPLP/1911). Undertake feasibility testing for potential cycle routes to determine their achievability and whether they would be sufficiently used to mitigate over capacity junctions. Demonstrate how these would effectively relieve congestion at over capacity junctions. (Billericay Town Council RPLP/1911). Review the one way proposal at Norsey Road and the loss of part of the lay-by at Western Road where the road would be widened. (Billericay Town Council RPLP/1911). Produce up to date traffic count data and identify origin-destination of traffic flows to determine how much traffic is local and how much is through traffic. (Billericay Town Council RPLP/1911). Clarify whether the modelling included the 2 way proposal for Laindon Road and adjust the modelling if necessary. (Billericay Town Council RPLP/1911). Policy T2(1)(f) needs to detail how access will be connected into Wickford, especially given that H12 is demonstrated within the PLP THIA to not be reliant on a new A127 junction. (Pigeon (Wickford) Ltd RPLP/2233). Policy T2 should be modified to clarify which sites will be required to make financial contributions towards which items of 	Council's Infrastructure Delivery Plan produced to support the Local Plan. The Community Infrastructure Levy has only been subject to consultation on the Preliminary Draft Charging Schedule at this stage. The Regulation 123 List will contain details of what infrastructure is intended to be funded through the CIL and this will be informed by responses to the Preliminary Draft Charging Schedule consultation. CIL is also not the only source of funding for infrastructure, however, as infrastructure can be funded through alternative sources such as S106, S38, S278 agreements, and external sources of funding such as through SELEP for example. Developers are also able to provide infrastructure as part of their development proposals. There have been comments concerned with the funding for road infrastructure improvements and the identification of necessary land. Since 2011, and in relation to the Basildon Borough, the Essex Transport Strategy has secured

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	 highway infrastructure, if any. (Pigeon (Wickford) Ltd RPLP/2233). The aspirations of the Council are misconceived. The market needs to identify what support it is willing to make to existing highway infrastructure. (Dale Farm Residents Group RPLP/3207, The Gypsy Council RPLP/3208). Basildon Council has not identified land to the north of the A127 that is required for highway improvements, yet has identified that this is the case when seeking to prevent development. (Dale Farm Residents Group RPLP/3207, The Gypsy Council RPLP/3208). Funding should be identified for the widening of the A127 in order for the plan to be found sound. Provide a relief road which will effectively mitigate the growth proposed. Reroute the relief road avoiding Frithwood Lane. Build on brownfield land. Provide sufficient infrastructure. Plan has not considered the extent of providing more houses in Billericay on infrastructure. Consider the Billericay District Residents Association independent traffic analysis report which disputes the findings of the study which informed the Draft Local Plan 2016. Scrap the relief road. Provide jobs within the borough to reduce commuting. 	major investment into the Borough's transport network including the new £63m junction upgrade on the A13/A130 at Sadlers Farm (completed 2013) and the £5m highway works to improve capacity in the A127 enterprise Corridor (completed 2011). More recently, £3m pinch point funding from the Department for Transport (DfT) was secured to widen a key part of the A176 between Basildon Hospital and Basildon Town Centre, to support expansion of the Town Centre and address congestion of this link. Funding has also been secured from SELEP to fund various improvements along the A127 Corridor including £27m for improvements to the A127/A130 Fairglen Interchange. A further £13m has also been secured for the Basildon Integrated Transport Package which will help to deliver public transport improvements, highway changes required by the Basildon Town Centre Masterplan and improved access to Basildon Hospital. Securing funding of this nature is most certainly the case for development which is occurring now and

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	 Homes should be spread throughout the Borough rather than loaded in Billericay. Relief road should be removed from the plan and a full by-pass from A12 to A127 inserted. To avoid ambiguity, Policy T2 4 should read 'the costs of this route will be met by developers' removing the words 'It is expected'. Housing numbers in Billericay should be reduced to sustainable levels given environmental considerations and rail network limitations. Fundamental changes to several sections and policies in the plan. 	will continue to be secured in this way throughout the Local Plan period to ensure the delivery of highway improvement schemes, particularly where highway improvements will not be able to be paid in full by the developer without making the development proposals unviable. However, this does not cover the total cost of all highway upgrades and developers will be expected to pay for transport improvements where it is necessary to make the development acceptable in planning terms. However, development can also be phased in the Local Plan with the introduction of new infrastructur which is funded from a combination of developers and public funding, providing there is a reasonable prospect that funding can be secured from alternative sources in order to deliver it. Comments have queries funding for road improvements and the need for them. The Council has carried out extensive transport modelling to determine mitigation options for the highway

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		network in order to cope with the additional traffic impact of growth in the Borough. The Council has also carried out extensive viability appraisal to determine the appropriate contributions that will need to be made by developers and where there might be a funding gap that the Council will need to secure either through external sources of funding or through the adoption of a Community Infrastructure Levy. This Levy has also been subject to viability appraisal to determine the level of contributions that developers can afford and is non-negotiable. If the developer does not pay the appropriate contribution or deliver the appropriate improvement to the highway, planning permission will not be granted.
		Green Belt and environmental issues have been carefully considered with regards to previous Local Plan consultation responses, where infrastructure clearly stood out as the most important issue for the Borough and the Council has subsequently taken

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through the Revised Publication Local Plan.
Comments were made about using brownfield land rather than Green Belt. The Local Plan has exhausted all brownfield development opportunities and this only covers a third of the full objectively assessed needs for housing in the Basildon Borough.
Historic England have commented on the need to reference conserving and enhancing the historic environment within policy T2. This amendment is supported by the Council for the purpose of improving clarity and accuracy.
Comments were also made in relation to parking. Transport policies in the Local Plan aim to increase the level of parking both at the station and in the town centre.

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the decision to produce an infrastructure led plan, and this theme clearly runs

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		Comments have also been received in relation to car parking capacity within Billericay High Street and at the station. The Essex Parking Standards - Design & Good Practice (2009) is considered appropriate in the Borough because they promote minimum requirements for parking for residential developments, but maximum requirements for parking in non-residential areas which is consistent with the NPPF which supports sustainable travel modes. However, the Vehicle Parking Capacity and Intervention Study recognises that there is parking congestion in this location and therefore the policies in this plan protect town centre and station car parking in such instances.
		Comments have been made with regard to lack of employment and commuting. The plan contains an overprovision in terms of employment development for new jobs and therefore commuting out of the Borough for work could reduce, however, it is noted that a significant proportion of this growth with be in the

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		Basildon settlement and there may be a requirement for commuting across the Borough.
		Concern has been raised over the three existing sports clubs and proposed highway changes. Of the three sports facilities, two are to be replaced with new facilities to the west of the relief road and the other facility will remain in its current location to the east of the relief road. Additional facilities are a requirement of all new development and details of how much can be found in the Infrastructure Delivery Plan to support the Local Plan.
		It has been requested that the Dunton Garden Village proposal be reconsidered. The Dunton Garden Village proposal is outside of the Basildon Borough and would therefore not contribute to the housing requirement for the Basildon Borough. Further development within the Basildon Borough at Dunton has been considered but would pose a risk to the soundness of the Basildon Local Plan due to the

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		uncertainty around proposals in Brentwood and Thurrock beyond the Borough boundary. The decision taken by Cllrs on the position of the relief road was taken on the basis that the alternative route previously approved by Committee would have had an adverse impact on an Ancient Woodland. Therefore, the current route, which would not have such an impact on the ancient woodland, and where Frithwood Lane could be expanded through land which the Highway Authority has rights over, was subsequently considered by Cllrs to be the better option.
		Comments were made in relation to consultation about different highway improvements and general consultation on the whole plan. The proposed relief road has been subject to consultation as part of the Draft Local Plan 2016 and the Revised Publication Local Plan 2018. The Highway Mitigation Options were also tested against a variety of scenarios including different levels of development

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		and in different areas of the Borough. There have been demands for further consultation and for the Council to repeat a Regulation 18 consultation given the changes that have been incorporated into the Revised Publication Local Plan 2018 that were not in the Draft Local Plan 2016. The Council does not consider this necessary as the Plan has been prepared in accordance with the Regulations, the Council's Statement of Community Involvement and to delay the Plan, to carry out further consultation, would not be in accordance with its statutory Local Development Scheme 2018-2020.
		Comments have been made relating to the distribution of housing across the Borough. Policy SD2 states clearly that growth has been distributed between all settlements across the Borough with only 17% of the total allocated to Billericay. This compares to 50% in Basildon and 20% in Wickford. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of

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		the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes including the Billericay Western Relief Road, which are proven to alleviate the impact of growth on the highway network in this part of the Borough. This assessment considered various scenarios including levels of development over and above the proposed total housing figures for Billericay in the RPLP. Details of the necessary upgrades to infrastructure to cope with growth in the Borough is set out in detail in the Council's Infrastructure Delivery Plan. Concern has been raised against house values being affected. House prices are
		not a planning consideration. Simply reducing housing numbers does not make development proposals more sustainable, nor does it reduce the propensity to travel via the private car. The increase in population will result in additional travel movements whether the

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		houses are built or not, however, if we are to provide the next generation with the opportunity of having a home of their own, this represents an opportunity to improve the use of more sustainable forms of travel, and Policy T1 supports this. Transport Statements and Assessments will be required to be submitted as part of each planning application (those which result in significant transport movements at least) and it will be up to the developer to demonstrate how they will promote the use of sustainable modes of transport as part of their proposal. If this is not considered to be satisfactory, then the application for development will be refused. Recent housing development schemes in Essex have included providing new bus services and a free bus pass for one year to all new residents as a measure for encouraging behavioural change in travel choices for example.
Policy T3: Improvements to	Objection:	ECC have suggested reference be made to public realm and landscaping within

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Footpaths, Cycling and Bridleway Infrastructure	 There is no reference to the inclusion of public realm and landscaping within the funding to deliver the infrastructure improvements. (Essex County Council RPLP/1748). Despite the title, this policy focusses solely on walking and cycling and completely ignores other user groups such as equestrians. Any new routes should be multi-user as a default so as to be accessible to all users. (Essex Bridleways Association RPLP/361). The Billericay Road network is extremely sensitive to change and proof needs to be provided for the proposed relief road. The one-way section of Norsey Road has been trialled and abandoned and the widening of Western Road would adversely impact upon the takeaways due to loss of parking. (Billericay Action Group RPLP/1138). The town is short of parking, with more parking to be lost at Radford Crescent. (Billericay Action Group RPLP/1138). Increases in traffic will not be able to be offset with increases in sustainable travel such as cycling. (Billericay Action Group RPLP/1138). Schemes outlined in the Cycling Action Plan are subject to feasibility study and therefore no evidence to suggest they will be delivered or result in increased use of sustainable transport modes. This is important as some junctions in the town only have sustainable transport measures for mitigation. (Billericay Town Council RPLP/1922). 	the funding to deliver the infrastructure improvements. The Council agrees that this amendment would be useful for clarity. Essex Bridleways Association have suggested reference to multi-user to incorporate disabled, and equestrians, where appropriate, be made within policy T3. This amendment is supported by the Council for the purpose of improving clarity. A number of comments were also raised relating to the one-way restriction at Laindon Road. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes including the Billericay Western Relief Road, which are proven to alleviate the impact of growth on the highway network in this part of the Borough. This also includes the removal of the one-way restriction on Laindon

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	 Cycling Action Plan does not include cycle and bridleways within the new development areas. (Billericay Town Council RPLP/1922). The plan references new-cycle ways to reduce car use. Is this realistic? Modification/s requested: Suggested wording changes to part 2 of policy T3 to include reference to public realm and landscaping. (Essex County Council RPLP/1748). Any new routes should be multi-user as a default so as to be accessible to all users. (Essex Bridleways Association RPLP/361). Undertake feasibility testing for potential cycle routes to determine their achievability and whether they would be sufficiently used to mitigate over capacity junctions. Demonstrate how these would effectively relieve congestion at over capacity junctions. Secure funding for these routes. (Billericay Town Council RPLP/1922). Fundamental changes to several sections and policies in the plan. 	Road in combination with the Relief Road. Comments have also been made about the relief road and its requirements as well as the need for other highway improvements. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes including the Billericay Western Relief Road, which are proven to alleviate the impact of growth on the highway network in this part of the Borough. Details of how infrastructure will be expanded to meet the additional demands of the increased population is contained in the Council's Infrastructure Delivery Plan. This contains details on power, water supply & flood defences, health & social care, education, highways, public transport, open space & outdoor sport, superfast broadband, emergency services, and is a living document that will be updated

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		throughout the lifetime of the Council's Local Plan to ensure the most appropriate infrastructure upgrades are delivered to support growth. It is recognised that it is desirable to align job growth and housing growth to reduce commuting. However, the economic development evidence base was unable to identify additional suitable sites for new employment development within Billericay. The nearby A127 Enterprise Corridor is however a suitable location, and policy T4 sets out proposals for increasing accessibility to this corridor by public transport to assist in reducing congestion on the road network. The Local Plan however seeks to protect existing employment areas in the Borough including Radford Way Business Park, Billericay and rural enterprise sites in Billericay at Guildprime Business Park and Barleylands Depot. This is consistent with the advice set out in the ELPS, EDNA and ED Topic Paper.

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		Comments have been made by various consultees relating to the widening of the A127. Widening of the A127 features within the long-term proposals for the route, and requires land to be safeguarded for such purposes in the meantime, but this may not represent the only solution to future congestion issues in this area. It is also not necessary to have secured the necessary funding for all long-term mitigation schemes at the point the plan is adopted. Basildon Borough Council has signed an MoU with all Council's along the A127 corridor to give themselves the best opportunity to bid for funding, the A127 Corridor for Growth Economic Plan is currently being updated to support subsequent funding bids and an A127 taskforce, made up of politicians and senior Council officers has been set up to facilitate the delivery of future alleviation schemes for the route, which may or may not include potential widening. With regard to the Radford Way car park,
		there is no policy in the plan proposing

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		development on the Car park, only amending the boundary of Radford Way employment area to include the car park on Radford Crescent. Sufficient protection will be provided by Policy T9 Parking provision within employment areas once the employment area boundary has been amended. However removing the proposed boundary change would leave the car park susceptible to a planning application for residential or employment development and will not be protected by policy T9.
		Comments have been made in relation to cycling. Sustainable transport measures are not only restricted to the provision of schemes that will encourage Cycling. Other measures such as walking, public transport, car sharing clubs etc. will also form part of required mitigation to the road network. Transport Statements and Assessments will be required to be submitted as part of each planning application (at least those that will result in significant transport movements) and it will be up to the

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		developer to demonstrate how they will promote the use of sustainable modes of transport as part of their proposal. If this is not considered to be satisfactory, then the application for development will be refused. The schemes outline in the Cycling Action Plan are additional to the policy requirements of the Local Plan. Schemes in the Cycling Action Plan are being led by the Highway Authority, who has already received funding to implement certain improvements but they must be subject to feasibility study first to ensure that they are able to be carried out and that they represent the best possible solution. It may be that following feasibility study, a better solution or alternative solution presents itself but there is already a Commitment in the Action Plan and some funding available to make the improvement. A comment has been made regarding the proposal to provide new cycle ways to reduce car use and whether it is realistic. Reducing car use is not only restricted to the provision of new cycle

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		ways. Sustainable transport measures such as walking, cycling, public transport, car sharing clubs etc. will all form part of required mitigation to the road network. Transport Statements and Assessments will be required to be submitted as part of each planning application (at least those that result in significant transport movements) and it will be up to the developer to demonstrate how they will promote the use of sustainable modes of transport as part of their proposal. If this is not considered to be satisfactory, then the application for development will be refused.
Paragraphs 9.56 – 9.57 Policy T4: Improvements to Public Transport Infrastructure and Services	 Objection: It is incorrectly stated in paragraph 9.56 that the Elizabeth Line will be a non-stop service. In fact it will call at all intermediate stations. Following the announcement earlier this year the opening date should be amended to autumn 2019. (Transport for London RPLP/1869). Train capacity from Billericay to London is at capacity and there is insufficient parking at either Billericay or Shenfield stations. Also, there is no lift at Billericay station on one of the platforms. 	Transport for London have requested an amendment to paragraph 9.56 to reference that the Elizabeth Line will call at all intermediate stations. This amendment is supported by the Council for the purpose of improving clarity and accuracy. Point of clarification have been requested in relation to Crossrail. Whilst

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	 A bus service should be provided from Billericay to Shenfield, cross-rail should be added to Billericay and oyster cards should be valid from Billericay. Para 9.56 refers to Crossrail/Elizabeth Line as providing "nonstop" services to London and faster journeys. Neither of these comments is true. Train service from Billericay to London is already unreliable and there is no way the current operators can cope with a large influx of new passengers. Other comment/s: The references to Crossrail should be updated in paragraph 9.56. (Essex County Council RPLP/1749). 	the Elizabeth Line may be able to provide faster journeys to western parts of London that may not be true of all journeys and the service will stop at several stations along the way. Rewording of the paragraph 9.56 is supported to provide clarification. ECC have requested changes to paragraph 9.56 to update the references to Crossrail. This modification is supported by the Council for providing clarity.
	 Modification/s requested: Amend the references to Crossrail in paragraph 9.56. (Essex County Council RPLP/1749). Amend paragraph 9.56 as suggested to reference that the Elizabeth Line will call at all intermediate stations. (Transport for London RPLP/1869). A bus service should be provided from Billericay to Shenfield, cross-rail should be added to Billericay and oyster cards should be valid from Billericay. Fines should be paid by operators to the Council for unreliability, refunds for overcrowded trains and delay-repay 	Various comments have been received regarding the train services from Billericay. Proposed increases to Railway Capacity are set out in the Council's Infrastructure Delivery Plan. This includes, amongst other things, notable journey time improvements and 55% more seats in the morning peak across the Liverpool Street line as part of a £1.4bn investment by the current franchise holder Abellio Greater Anglia. The possibility of a bus service to alternative services outside of the

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	for 15min delays, reduce fair prices and declassify first class sections.	Borough, or the introduction of Oyster Cards would go beyond the remit of the Basildon Borough Local Plan as TfL are responsible for the extent of the Oyster Card. The rail network is not regulated by the Council, therefore the Council is unable to issue fines. Network Rail are responsible for awarding the franchise for the System Operator.
Policy T4: Improvements to Public Transport Infrastructure and Services	 Support: Gleeson broadly welcome the Local Plan in terms of allocations H17 and H18 and their removal from the Green Belt. (Gleeson Developments Ltd RPLP/1870). Gleeson support the overall spatial strategy for Growth across the Borough and the vision for Basildon, to deliver a more prosperous economy providing employment for residents and higher value jobs is fully supported. (Gleeson Developments Ltd RPLP/1870). In relation to Policy T4 the promotion of sustainable transport and the establishment of new public transport services in appropriate circumstances is supported. (Gleeson Developments Ltd RPLP/1870). Taylor Wimpey support the plan insofar as it seeks to allocate land for development at Kingsmans Farm, Billericay under proposed policy H17c. (Taylor Wimpey RPLP/2017). 	Some developers have raised a comment regarding amending part 4 of policy T4 which references a set proximity of new development to bus stops. It is agreed by the Council that this be expanded further for the purpose of improving clarity and accuracy. Comments have been received in relation to railway capacity also. Proposed increases to Railway Capacity are set out in the Council's Infrastructure Delivery Plan. This includes, amongst other things, notable journey time improvements and 55% more seats in the morning peak across the Liverpool Street line as part of the £1.4bn

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	 Objection: Part 4 of Policy T4 expects development proposals to ensure that all homes and other frequently accessed for of development are within 400m of a bus stop. (Gleeson Developments Ltd RPLP/1870). Blanket requirement for all homes to be within 400m of a bus stop does not comply with NPPF or NPPF2. The criterion should be amended to remove reference to 400m, be an ideal scenario rather than ensuring it happens and reference to allocation policies should be made so there is no conflict between policies. (Redrow Homes Ltd RPLP/2212). Policy T4 4c should be amended to refer to public transport facilities rather than bus stops. Further distances should be considered for bus termini and train stations. (Redrow Homes RPLP/2213). Allocation of the majority of employment land in Basildon does not promote sustainable transport as new residents in other areas will need to travel to this area or to London for work. (CPREssex RPLP/1877). The plan contains no costed commitments to increase train capacity. (CPREssex RPLP/1877). Concerned with Rail infrastructure and there is nothing in the Local Plan or from the rail service provider to support the plan ambition of providing an excellent passenger transport network. (Billericay Town Council RPLP/1923). 	investment by the current franchise holder Abellio Greater Anglia. c2c, as the current operator of the Fenchurch Street line will include a £1.5bn total premium which will have passenger benefits such as 22% increase in number of trains, £33m station investment, 40 new trains from 2019 to 2024 etc. In relation to Crossrail, whilst the Elizabeth Line may be able to provide faster journeys to western parts of London that may not be true of all journeys and the service will stop at several stations along the way. Rewording of the paragraph is recommended and supported by the Council to provide clarification. Comments were made in relation to reducing housing numbers. Simply reducing housing numbers does not make development proposals more sustainable, nor does it reduce the propensity to travel via the private car. The increase in population will result in additional travel movements whether the houses are built or not, however, if we

for encouraging behavioural change in

travel choices for example.

(Taylor Wimpey RPLP/2017).

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	 Access to the Town Centre from Basildon Railway Station needs to be improved as it is currently a detractor to pedestrian based activities and access to the centre by sustainable means is paramount to support its vitality and viability. RPLP and Masterplan should support this. (Infrared RPLP/2144). Land to the West of Basildon would represent a preferable allocation to some others as with the introduction of the Dunton Link Road, there are no other significant highway mitigation required to support growth in this area according to the HIA produced to support the Basildon Local Plan. Other sites include a relief road for H17 and a new grade separated junction for H11 and H12. This represents a fundamental soundness issue for the Local Plan. (Bellway Homes and Crest Nicholson RPLP/2248). Billericay railway station already has a high frequency of trains with maximum carriage length and therefore congested trains will get worse as a result of the development proposals. Train services from Billericay are often overcrowded at peak times. Traffic is frequently congested in the centre of Billericay with roads and interchanges unable to cope. Lack of commuter parking, station parking will need increasing. The relief Road has the potential to cause problems at Mountnessing Rd / London Rd and Common / London Road / Sun Corner and will only help people leaving the area. 	It is suggested that policy the promotion sustainable travel modes is not sufficient. This is already clearly the intent of policy T1 with sustainable travel modes mentioned throughout. Comments have been made by various consultees relating to the widening of the A127. Widening of the A127 features within the long-term proposals for the route, and requires land to be safeguarded for such purposes in the meantime, but this may not represent the only solution to future congestion issues in this area. It is also not necessary to have secured the necessary funding for all long-term mitigation schemes at the point the plan is adopted. Basildon Borough Council has signed an MoU with all Council's along the A127 corridor to give themselves the best opportunity to bid for funding, the A127 Corridor for Growth Economic Plan is currently being updated to support subsequent funding bids and an A127 taskforce, made up of politicians and senior Council officers

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	 There is an opportunity for the Borough to take advantage of the benefits of the new Elizabeth railway line, but only if capacity improvements are made to current rail services. Concerned with the impact of development in the Borough and along the A127 on commuters with no new jobs being created as part of Local Plan. Lack of employment provision in Billericay will encourage further unsustainable travel to work due to a lack of capacity in the railway, lack of parking, no additional bus service to new developments and no plans to provide these. There has been no assessment of train capacity, costs, or commitments. Inadequate analysis of effects on commuting. Concern about air pollution and health impacts. Roads clogged up from east to west Billericay. No direct bus route from Basildon to Chelmsford via Noak Hill Road or to Shenfield to relive pressure on railway. Policy T4 does not deliver improvements to rail services or access to stations. Crossrail will do little to increase capacity on trains travelling to Liverpool Street. The new rolling stock will increase seated capacity by 25% but there is no evidence to show that this would be sufficient to meet increased demand. 	has been set up to facilitate the delivery of future alleviation schemes for the route, which may or may not include potential widening. A number of comments have been received in relation to the proposed relief road and the logistics of other highway improvements within Billericay. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes including the Billericay Western Relief Road, which are proven to alleviate the impact of growth on the highway network in this part of the Borough. Essex County Council, as the Highway Authority have been a joint partner in the commissioning of this work and have sufficient highway land under their control to ensure the required expansion of Frithwood Lane is delivered. The further extension of the relief road is not currently justified with the amount of growth in the RPLP.

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	 The plan mentions improvements to cycling routes but Billericay doesn't have any except for one which is unfit for purpose. No further money being spent on the station. Insufficient analysis has been carried out on the impact to public transport capacity. Local Schools, GP and hospital would not be able to cope with growth. Need to reduce housing growth. Billericay trains are not sustainable. Rail infrastructure in Billericay cannot cope and increase in working remotely will not pick up the slack. The RPLP is unsound. Public transport services do not have sufficient capacity. Lack of employment land will result in additional commuting and the existing rail service is crowded at peak times with little scope for increasing frequency or capacity of trains. Crossrail will not over congestion relief as it is not available from Billericay and is a slow service. Bus services are constrained by inadequate roads and lack of funding. Local people's views have not been taken into consideration in regards to objections to transport. Increases to rail capacity shows increases across the whole franchise region and therefore we cannot be sure they will 	It is indicated that no provision is made for cycling. This provision is clearly set out in policy T3. The possibility of a bus service to alternative services outside of the Borough would go beyond the remit of the Basildon Borough Local Plan. Concern was raised in relation to sufficient infrastructure being provided. The development proposals include various infrastructure as set out in the Council's Infrastructure Delivery Plan produced to support the Local Plan. Details of how infrastructure will be expanded to meet the additional demands of the increased population is contained in the Council's Infrastructure Delivery Plan. This contains details on power, water supply & flood defences, health & social care, education, highways, public transport, open space & outdoor sport, superfast broadband, emergency services, and is a living

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	 meet the increased demand created by development in towns in the Basildon Borough. Concerned about rail capacity in Billericay and removing seats on trains to add capacity will be unsafe. Not possible to increase capacity into Liverpool Street station so situation will worsen. Modification/s requested: Amend part 4 of Policy T4 which references a set proximity of new development to bus stops to be more flexible in line with the NPPF. (Gleeson Developments Ltd RPLP/1870, Redrow Homes RPLP/2212 and RPLP/2213). The rail service provider needs to get an estimate from each of the Councils to provide detail on the number of houses being built in their area that has access to a main line station (e.g. Wickford, Rayleigh, Hockley etc. and predictions of the increase in flights/passengers for London Southend Airport so that they can provide a plan of what actions they are going to take and how they are going to cope with the increase in passenger numbers from now to 2043 and beyond. (Billericay Town Council RPLP/1923). An integrated, coherent public transport system needs to be planned and gradually introduced as the houses are built. This is to support: The station (especially at peak times) Get to the town centre during the day and to neighbouring towns and 	document that will be updated throughout the lifetime of the Council's Local Plan to ensure the most appropriate infrastructure upgrades are delivered to support growth. Comments have been made in relation to air quality concerns. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes including the Billericay Western Relief Road, which are proven to alleviate the impact of growth on the highway network in this part of the Borough. Also, there is no air quality issue that are envisaged to occur as a result of the additional traffic as this has been adequately mitigated to ensure traffic flows without the stop/start congestion issues which cause problems with air quality. Comments have also been received in relation to car parking capacity within

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	 hospitals. Reduce congestion, emissions/air pollution and need for car parking. (Billericay Town Council RPLP/1923). The infrastructure, layout, traffic movement and parking facilities need to be assessed and improvements made to reduce/restrict congestion and possible gridlock around the rail station area at peak times. (Billericay Town Council RPLP/1923). Land to the West of Basildon would represent a preferable allocation to some others as with the introduction of the Dunton Link Road, there are no other significant highway mitigation required to support growth in this area according to the HIA produced to support the Basildon Local Plan. Other sites include a relief road for H17 and a new grade separated junction for H11 and H12. This represents a fundamental soundness issue for the Local Plan. (Bellway Homes and Crest Nicholson RPLP/2248). Network Rail need to improve their service to deal with increased passenger numbers. Additional road improvements needed. Parking needs increasing. Provide a relief road which will effectively mitigate the growth proposed. Provide local jobs to reduce commuting. Public transport needs improving. Reduce the overall housing target for the borough. 	Billericay High Street and at the station. The Essex Parking Standards - Design & Good Practice (2009) is considered appropriate in the Borough because they promote minimum requirements for parking for residential developments, but maximum requirements for parking in non-residential areas which is consistent with the NPPF which supports sustainable travel modes. However, the Vehicle Parking Capacity and Intervention Study recognises that there is parking congestion in this location and therefore the policies in this plan protect town centre and station car parking in such instances. Comments have been made in regards to lack of local employment and commuting issues. It is recognised that it is desirable to align job growth and housing growth to reduce commuting. However, the economic development evidence base was unable to identify additional suitable sites for new employment development within Billericay. The nearby A127 Enterprise

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		Corridor is however a suitable location, and policy T4 sets out proposals for increasing accessibility to this corridor by public transport to assist in reducing congestion on the road network. The Local Plan however seeks to protect existing employment areas in the Borough including Radford Way Business Park, Billericay and rural enterprise sites in Billericay at Guildprime Business Park and Barleylands Depot. This is consistent with the advice set out in the ELPS, EDNA and ED Topic Paper.
		Suggestions have been made that the rail providers must be made aware of the proposed growth within the Borough. The Council and Greater Anglia are working to different future growth periods as Greater Anglia are bound by the period of time set out in their franchise. However, the Council's IDP is a living document and details of Local Plan growth will continue to be share with future franchise holders, whether that be Greater Anglia or another service

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		provider to ensure capacity improvements are aligned with future growth plans for the Borough. Comments have been made in relation to access to bus services. The Transport policies of the Local Plan require all new development to be within 400m of public transport services. Therefore, this will require new bus services to be provided where they do not currently exist or if the development is not within walking distance of another form of public transport such as the railway.
		Comments were made in relation to consultation about different highway improvements and general consultation on the whole plan. The proposed relief road has been subject to consultation as part of the Draft Local Plan 2016 and the Revised Publication Local Plan 2018. The Highway Mitigation Options were also tested against a variety of scenarios including different levels of development and in different areas of the Borough. There have been demands for further consultation and for the Council to repeat

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		a Regulation 18 consultation given the changes that have been incorporated into the Revised Publication Local Plan 2018 that were not in the Draft Local Plan 2016. The Council does not consider this necessary as the Plan has been prepared in accordance with the Regulations, the Council's Statement of Community Involvement and to delay the Plan, to carry out further consultation, would not be in accordance with its statutory Local Development Scheme 2018-2020.
		It has been suggested that further development in the west of Basildon would be suitable as access would require less mitigation. Further development within the Basildon Borough to the west of Basildon has been considered but would pose a risk to the soundness of the Basildon Local Plan due to the uncertainty around proposals in Brentwood and Thurrock beyond the Borough boundary.

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Paragraphs 9.63 – 9.65 Policy T5: Transport Improvement Areas	 Objection: The list of schemes in paragraph 9.63 should be reviewed and refined to ensure it is up to date, based upon the Publication THIA 2018 (and addendum). (Essex County Council RPLP/1752). No reference to ECC Sustainable Modes of Travel Strategy (August 2016). The document should be updated to reflect this. (Essex County Council RPLP/1754). Paragraph 9.64 states that transport improvements are options and at early stages of development which raises questions as to the true cost and delivery of those items. (Billericay District Residents Association RPLP/1624). Other comment/s: Would like to see larger noise barrier between Haywain and Pitsea interchange. Modification/s requested: Amend paragraph 9.63 as suggested. (Essex County Council RPLP/1752). Amend paragraphs 6.63 – 9.65 as suggested. (Essex County Council RPLP/1752). Both the Borough Council and District Council need to provide evidence that the schemes have been fully assessed and a true understanding is known as to their costs and the 	ECC have sought amendments to paragraphs 9.63 to 9.65 of the plan to improve is accuracy. The Council supports these amendments. A comment has been received noting that the highways proposals in the Local Plan are at an early stage of development. This is appropriate given that there needs to be a plan in place to enable many of the sites currently within the Green Belt extent to be developed. However, the Council has carried out a high levels costing exercise, which includes a significant bias adjustment to understand the cost of the highway infrastructure required, and is confident it appreciates the scale of the cost. This is set out in the IDP in more detail. It is noted that a consultee would like to see a larger noise barrier between the Haywain and the Pitsea interchange on the A13. This is a matter for the Highway Authority, and not the Local Plan, as limited development (only around 30 – 40 homes) will be delivered in this
		vicinity.

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	constraints which need to be overcome. (Billericay District Residents Association RPLP/1624).	Billericay District Residents Association have requested that BBC and ECC need to evidence the assessment highway schemes. The NPPF requires Local Authorities as part of the production of Local Plans to demonstrate that any significant impacts from development on the transport network can be cost effectively mitigated to an acceptable degree. The mitigation options identified in the Highway Impact Assessment (HIA) evidence have been tested, costed, and subject to viability appraisal to ensure that they can be cost effectively mitigated, and the HIA shows clearly that this would be to an acceptable level.
Policy T5: Transport Improvement Areas	 Objection: It is important to ensure that any transport policies within the Plan have an aspiration to ensure full multi-user connectivity over major roads and railway lines to prevent communities becoming severed. (Essex Bridleways Association RPLP 357). The need to conserve and enhance the historic environment is not mentioned in supporting text or policy T5. Additional criterion and mention is supporting text is required. Only where harm to the historic environment cannot be avoided should 	Essex Bridleways Association seek clarification to be provided within Policy T5 to state that any Transport improvement areas will be required to not create any severance between communities. The Council supports these amendments.

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	 mitigation measures be considered. (Historic England RPLP/2152). The provision of a grade separated junction on the A127 at Pound Lane, including a link road to the A130 will require land to be made available. Policy T5 confirms the Council will safeguard land for transport improvements. Pigeon are not aware of any contact from the Council to secure land. (Pigeon (Wickford) Ltd RPLP/2234). Policy T1, T2 and T5 appear to identify that there are resources available to support development of strategic transport infrastructure. This is understood not to be the case and that improvements to highway infrastructure will need to be funded by developers. (Dale Farm Residents Group RPLP/3210, The Gypsy Council RPLP/3211). Modification/s requested: It is important to ensure that any transport policies within the Plan have an aspiration to ensure full multi-user connectivity over major roads and railway lines to prevent communities becoming severed. (Essex Bridleways Association RPLP 357). Amend policy T5 and supporting text or policy T2 to reference the need to conserve and enhance the historic environment. Only where harm to the historic environment cannot be avoided should mitigation measures be considered. (Historic England RPLP/2152). 	Historic England have commented on the need to reference conserving and enhancing the historic environment within policy T5. This amendment is supported by the Council for the purpose of improving clarity and accuracy. A developer raised comments regarding the need of their land for a link road. The RPLP does not propose to include a link road to the A130 as the proposal if for the connection to Tresco Way only. The Council states that land will be safeguarded for transport improvements in policy terms only, it does not state that the Council will secure the land in any other way. There have been comments concerned with the funding for road infrastructure improvements and the identification of necessary land by The Gypsy Council and Dale Farm Residents Group. Since 2011, and in relation to the Basildon Borough, the Essex Transport Strategy has secured major investment into the Borough's transport network including

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	 The provision of a grade separated junction on the A127 at Pound Lane, including a link road to the A130 will require land to be made available. Policy T5 confirms the Council will safeguard land for transport improvements. Pigeon are not aware of any contact from the Council to secure land. (Pigeon (Wickford) Ltd RPLP/2234). The aspirations of the Council are misconceived. The market needs to identify what support it is willing to make to existing highway infrastructure. (Dale Farm Residents Group RPLP/3210, The Gypsy Council RPLP/3211). Basildon Council has not identified land to the north of the A127 that is required for highway improvements, yet has identified that this is the case when seeking to prevent development. (Dale Farm Residents Group RPLP/3210, The Gypsy Council RPLP/3211). 	the new £63m junction upgrade on the A13/A130 at Sadlers Farm (completed 2013) and the £5m highway works to improve capacity in the A127 enterprise Corridor (completed 2011). More recently, £3m pinch point funding from the Department for Transport (DfT) was secured to widen a key part of the A176 between Basildon Hospital and Basildon Town Centre, to support expansion of the Town Centre and address congestion of this link. Funding has also been secured from SELEP to fund various improvements along the A127 Corridor including £27m for improvements to the A127/A130 Fairglen Interchange. A further £13m has also been secured for the Basildon Integrated Transport Package which will help to deliver public transport improvements, highway changes required by the Basildon Town Centre Masterplan and improved access to Basildon Hospital. Securing funding of this nature is most certainly the case for development which is occurring now and will continue to be secured in this way throughout the Local

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		Plan period to ensure the delivery of highway improvement schemes, particularly where highway improvements will not be able to be paid in full by the developer without making the development proposals unviable. However, this does not cover the total cost of all highway upgrades and developers will be expected to pay for transport improvements where it is necessary to make the development acceptable in planning terms. However, development can also be phased in the Local Plan with the introduction of new infrastructure which is funded from a combination of developers and public funding, providing there is a reasonable prospect that funding can be secured from alternative sources in order to deliver it.
		The Council has carried out extensive transport modelling to determine mitigation options for the highway network in order to cope with the additional traffic impact of growth in the Borough. The Council has also carried

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Policy T6: Managing Congestion	 There is no reference within the Policy requiring to the preparation of Travel Plans (be it for business, residential or schools) to accompany developments that are likely to generate significant amount of movements. (Essex County Council RPLP/1756). The RPLP explains that the cumulative impact of growth on the highway network will be severe. However, this is not the case for H12 which can be accessed via junctions that can be mitigated by sustainable measures rather than physical works. Supporting text to Policy T6 should be amended to accurately reflect evidence. (Pigeon (Wickford) Ltd RPLP/2235). No mention of congestion around schools. Should stop parents dropping off and picking up on A176 and A129. Concern about air pollution. Rush hour traffic in and out of Wickford on routes such as A130, A127, A129 are very congested. Additional housing development across the Borough will make the congestion worse. I do not see how the plan will address the problems of congestion in Wickford and this will have a negative impact on road safety, particularly for school children. Modification/s requested: Change Policy T6 to clarify include reference to requirement to prepare Travel Plans to accompany developments that are 	The Council notes the concern around air quality. This is a key reason a policy on reducing congestion is included in the Local Plan. ECC seek for travel plans to be referenced in this policy. It is agreed that travel planning is a means by which congestion can be reduced and therefore the amendment sought by ECC is supported by the Council. Comments were made by a developer regarding site H12 and highway infrastructure. Site H12 is in close proximity to a junction which would not be significantly over capacity in the future year scenario of the HIA. However, that does not provide confirmation that the site will not contribute to congestion on other parts of the highway network in the Borough. The site has not been assessed in isolation as part of the HIA, and growth in this area will contribute to the cumulative impact of development in this area which

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	likely to generate significant amount of movements. (Essex County Council RPLP/1756). Supporting text to Policy T6 should be amended to accurately reflect evidence that details site H12 can be accessed via junctions that can be mitigated by sustainable measures rather than physical works. (Pigeon (Wickford) Ltd RPLP/2235). No mention of congestion around schools. Should stop parents dropping off and picking up on A176 and A129. Trains are too busy and expensive.	will require mitigation through physical highway improvement works. It is noted that some representations indicate concern about congestion around schools. This is a matter for the Highway Authority, especially in relation to existing schools. No amendments to this DM policy are necessary to address this issue. Comments have been made in relation to traffic issues in Wickford. The Basildon Borough Local Plan Highway Impact Assessment has carried out extensive modelling of the transport network in the Basildon Borough and proposes several junction improvements and highway mitigation schemes including the grade separated junction on the A127 which are proven to alleviate the impact of growth on the highway network in this part of the Borough. The impact of the new junction would not only alleviate congestion at the Nevendon junction but also all junctions through the centre of Wickford and

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		junctions to the east of Basildon. The link roads associated with the new junction from Cranfield Park Road / Tresco Way in Wickford and to Courtauld Road and the A127 corridor in Basildon would provide an alternative route between the Basildon & Wickford town centres and is proven to alleviate congestion on junctions in the centre of Wickford. Comments have been raised on train services. Proposed increases to Railway Capacity are set out in the Council's Infrastructure Delivery Plan. This includes, amongst other things, notable journey time improvements and 55% more seats in the morning peak across the Liverpool Street line as part of a £1.4bn investment by the current franchise holder Abellio Greater Anglia.
Paragraph 9.75 Policy T7: Safe and Sustainable Access	 Objection: The references to air quality are noted, however should be updated to reflect the ongoing work between BBC and ECC in response to the UK air Quality Action Plan for Nitrogen Dioxide (2017). (Essex County Council RPLP/1757). 	The amendment sought by ECC in respect of updating paragraph 9.75 is supported by the Council.

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process as the desirable level of

	 Modification/s requested: Amend paragraph 9.75 as suggested to reflect the latest position. (Essex County Council RPLP/1757). 	
Policy T7: Safe and Sustainable Access	 Objection: Acknowledge Policy T7 however there is no reference to the ECC Sustainable Modes of Travel Strategy (August 2016); and the thresholds contained within it for Travel Plans, which differ from the thresholds for Transport Statements / Transport Assessments as referenced in the ECC Development Management Policies (Appendix B). (Essex County Council RPLP/1758). In part 4 of policy T7 reference should be made to sustainable modes of transport, to recognise that there are a range of options, apart from walking when encouraging children and parents to travel to school by means other than the private car. (Essex County Council RPLP/1759). Policy T7 only covers the needs of pedestrians and cyclists and no other user groups such as equestrians or the disabled. (Essex Bridleways Association RPLP/362). In relation to part 1. a) of policy T7, whilst the aspiration for access to public transport services within 400m is supported, it must be recognised that public transport providers will need to operate an effective service which will influence the 	The Council supports the amendments proposed by ECC, the Essex Bridleway Association and Gleesons, as they improve the clarity and deliverability of the policy. However the amendment sought by some promoters removing the 400m accessibility to public transport provision from this policy is not acceptable to the Council. There is clear evidence in the Transport and Highway Impact Assessment that there needs to be a modal shift to sustainable travel modes, and it is widely acknowledged best practice that providing nearby public transport options assists in the uptake of sustainable travel modes. 400m is widely accepted as a 5 minute walk, and used throughout the transport planning

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appropriate routing of services and it may not always be

appropriate for all parts of a development site to be within 400m of a bus stop or other public transport services. The

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	 policy is therefore insufficiently flexible as currently drafted. (Gleeson Developments Ltd RPLP/1872). Policy T7 is unsound as it is inconsistent with national policy and is unjustified. The requirement for access to public transport services within 400m is unduly prescriptive and not backed up by evidence. The National Travel Survey indicates a willingness to walk further than 400m and sustainable development is not defined by a maximum distance. (Wick 3 Nominees Ltd RPLP/1930 and RPLP/1961, Persimmon Homes RPLP/2074). Suggests amending Policy T7 part 1. d) and 1. e) to refer to the need to avoid severe residual cumulative impacts on the road network in order to make that element of the policy sound. Criterion 1. e) should be relocated to supporting text but with a review of the appropriateness of a 400m maximum distance to all public transport facilities. (Redrow Homes Ltd RPLP/2213). Policy T7 to include a reference that the policy is to be applied having regard to allocation policies. (Redrow Homes Ltd RPLP/2213). Modification/s requested: Change Policy T7 to clarify and reflect the different thresholds for the submission of Travel Plans or Transport Statements / transport Assessments. (Essex County Council RPLP/1758). 	accessibility. This requirement is therefore evidenced and reasonable. A developer has suggested wording changes to policy T7. Policy T7 1d refers to the fact that development must not result in a significant adverse impact on the local road network in respect of traffic capacity. This policy criterion is not just limited to the requirements of paragraph 109 of the NPPF which refers to the residual cumulative impact on the road network being severe. Policy T7 9(d) has been worded so that it can also refer to highway safety and paragraph 108 (c) of the NPPF which requires safe and suitable access for all users. Therefore, if a potential development would cause a level of congestion which may not be considered 'severe' in terms of the residual impact in national policy terms, but would mean that on this local road, safe and suitable access could no longer be achieved for all users, then this scenario would still be unacceptable and the policy covers both parts of the NPPF.

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	 Change part 4 of policy T7 to reference sustainable modes of transport. (Essex County Council RPLP/1759). Any new routes should be multi-user as a default so as to be accessible to all users. (Essex Bridleways Association RPLP/362). Amend part 1. a) of policy T7 as suggested. (Gleeson Developments Ltd RPLP/1872). Policy T7 should be amended to omit reference to 400m. (Wick 3 Nominees Ltd RPLP/1930 and RPLP/1961, Persimmon Homes RPLP/2074). Amend Policy T7 part 1. d) and 1. e) to refer to the need to avoid severe residual cumulative impacts on the road network in order to make that element of the policy sound. (Redrow Homes Ltd RPLP/2213). Criterion 1. e) should be relocated to supporting text but with a review of the appropriateness of a 400m maximum distance to all public transport facilities. (Redrow Homes Ltd RPLP/2213). Policy T7 to include a reference that the policy is to be applied having regard to allocation policies. (Redrow Homes Ltd RPLP/2213). 	Clarification can be provided to Policy T7 having regard to allocation policies as requested by a developer.
Paragraphs 9.81 – 9.85 Policy T8: Parking Standards	Objection: • There is no reference to Electric Vehicles charging points as referenced in policy T10. (Essex County Council RPLP/1760). Modification/s requested:	ECC propose amendments to paragraphs 9.81 – 9.85 which are supported for the purpose of providing clarity.

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	Change paragraphs 9.81 – 9.85 to include reference electric vehicles charging points. (Essex County Council RPLP/1760).	
Policy T8: Parking Standards	 Support: Supports adoption of Essex Parking Standards to create consistency with other Essex authorities, however, Basildon Council must ensure they are flexible in their approach with highly sustainable locations being allowed to provide reduced levels of car parking. Therefore, supports point 2 of this policy. (Wick 3 Nominees Ltd RPLP/1932 and RPLP/1962, Persimmon Homes RPLP/2075). The inclusion of T8 criterion 2 is supported, seeking to allow the provision of a reduction from minimum standards in sustainable locations. (Infrared RPLP/2141). Objection: Policy T8 should also include the possibility for car free development in such locations as enshrined in national policy and guidance. (Infrared RPLP/2141). Policy T8 also needs to state that shared parking can be provided for retail / commercial / residential uses to meet demand for different users of the centre at different times of day/night. (Infrared RPLP/2141). Policy T8 in relation to Parking Standards and the fact that locations well served by public transport may be considered appropriate for lower levels of provision, it is not considered 	The Council intends to apply the Essex Parking Standards which set minimum requirements for residential parking in order to prevent excessive on-street parking. However, part 2 of that policy does allow for lower levels of parking provision in those locations which are more sustainably located. It is noted some consultees wish for this to go further and confirm this to be the case in all circumstances. However, evidence provided by the recent redevelopment of Trafford House, adjacent to the railway station in Basildon Town Centre indicates that there is still a demand for parking at these sites, which will overflow onto the road if sufficient provision, or alternative options are not provided. The Council is not therefore minded to amend this policy at this time. Matters relating to town centre and station car parking provision are dealt with under policy T9. No amendment to

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	 appropriately positive in line with the requirements of the NPPF. (Arcadis RPLP/2204). The Council is reducing the amount of parking in Billericay to prevent commuter parking. More Street parking should be made available for Station and High Street use. Parking is inadequate in Billericay and the plan does not address this issue. The High Street and Chapel Street will be congested. Radford Crescent Car Park will be turned into an industrial unit. Plan does not legislate for increased volume of cars and parking infrastructure. Paragraph 9.80 miss-quotes the NPPF in relation to setting parking standards. To meet the sustainability goals of reduced carbon emissions, congestion, pollution and promoting healthy modes of transport, policies should aim to discourage car use and therefore car ownership. Walking and cycling should be made more practical and convenient options than driving. Modification/s requested: The wording of the policy should be amended to be more positive and in line with the NPPF noting that in sustainable locations, well served by public transport, lower levels of provision "will" be considered appropriate, as opposed to "may" be considered. (Arcadis RPLP/2204). 	policy T8 is required in respect of these matters. With regard to the Radford Way car park, there is no policy in the plan proposing development on the Car park, only amending the boundary of Radford Way employment area to include the car park on Radford Crescent. Sufficient protection will be provided by Policy T9 Parking provision within employment areas once the employment area boundary has been amended. However removing the proposed boundary change would leave the car park susceptible to a planning application for residential or employment development and will not be protected by policy T9. A minor wording change has been suggested and can be made to paragraph 9.80 for clarification and to avoid confusion as to the intentions of the NPPF. In relation to the additional certainty placed to Policy T8 part 2 with regards to reduced levels of car parking, this may not be appropriate for all

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	 More street parking for both Station and High Street use. Do not turn Radford Crescent Car Park into an industrial unit. Amend wording of Policy T8 part 2 as recommended to clarify and avoid confusion in relation to the intentions of the NPPF and levels of car parking. 	schemes. The parking standards apply to residential as well as non-residential development. For example, a health facility may require a standard level of provision but could be considered as not policy compliant unless a reduced amount of parking is proposed. However, it is agreed that the wording should be changed to make it clear that the lower levels of provision refers to car parking and not other forms of parking such as secure bicycle parking. The third modification suggestion does not add anything to point 3 of the policy and does not cover a potential development where reducing the amount of parking would need to be justified. For example, reducing disabled parking at a health facility. The Council would require a justification in order to make an informed decision.
Paragraphs 9.87 – 9.93 Policy T9: Town Centre,	 Objection: Recommend that greater emphasis is placed on the provision and improvements to sustainable transport, as set out in the ECC Sustainable Modes of Travel Strategy (August 2016). (Essex County Council RPLP/1761). 	The modifications suggested by ECC are supported by the Council, as sustainable travel options are at the heart of the Council's transport policies as set out in policy T1.

Section/Para/ Policy	Summary of Responses	Council's response
Employment Areas and Railway Station Parking Provision	 Modification/s requested: Change paragraphs 9.87 – 9.93 to clarify and provide context and greater emphasis on sustainable modes of transport including Public Transport to support future growth aspirations. (Essex County Council RPLP/1761). 	
Policy T9: Town Centre, Employment Areas and Railway Station Parking Provision	 Objection: Car parking in Billericay town centre has not been addressed. Town centre car parking insufficient. Station car parking cannot be increased. No allowance has been made to increase the number of parking spaces for the High Street or the station. Not clear what is happening to Radford Way car park. Parking will be reduced since the Car Park in Radford Crescent is designated for business development. New parking standards are only being applied to new developments. Billericay railway car park is at capacity and merely managing demand or suggesting that additional provision will be required does not solve the problem. Modification/s requested: Improve town centre and station car parking. Object to loss of Radford Way car park. The policy needs to provide provision for a park and ride facility close to Noak Hill Road / Laindon Road roundabout. 	Comments have been received in relation to car parking capacity within Billericay High Street and at the station. The Essex Parking Standards - Design & Good Practice (2009) is considered appropriate in the Borough because they promote minimum requirements for parking for residential developments, but maximum requirements for parking in non-residential areas which is consistent with the NPPF which supports sustainable travel modes. However, the Vehicle Parking Capacity and Intervention Study recognises that there is parking congestion in this location and therefore the policies in this plan protect town centre and station car parking in such instances.

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		With regard to the Radford Way car park, there is no policy in the plan proposing development on the Car park, only amending the boundary of Radford Way employment area to include the car park on Radford Crescent. Sufficient protection will be provided by Policy T9 Parking provision within employment areas once the employment area boundary has been amended. However removing the proposed boundary change would leave the car park susceptible to a planning application for residential or employment development and will not be protected by policy T9.
		Comments regarding car parking standards only being applied to new development were received. The Essex Parking Standards - Design & Good Practice (2009) is considered appropriate in the Borough because they promote minimum requirements for parking for residential developments, but maximum requirements for parking in non-residential areas which is consistent

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Policy T10: Electric Vehicle Charging	Action Plan for Nitrogen Dioxide (2017). (Essex County Council RPLP/1762). Modification/s requested:	Action Plan. This amendment is supported by the Council.
	 Reference should be made to DEFRA funded early measures to reflect the ongoing work between BBC and ECC in response to the UK air Quality Action Plan for Nitrogen Dioxide (2017). (Essex County Council RPLP/1762). 	
Policy T10: Electric Vehicle Charging Infrastructure Standards	 Objection: Policy T10 is unjustified. Providing charging points for electric vehicles in communal parking is complex and costly and will need to incorporate periodic replacement, insurance and management. The Viability Appraisal for the Local Plan has not given regard to these costs and the quantum of off-plot charging points should be significantly reduced so that development is not rendered unviable. (Wick 3 Nominees Ltd RPLP/1931 and RPLP/1963, Persimmon Homes RPLP/2078). Policy T10's requirement for passive and active electric vehicle charging points is considered overly onerous and unjustified. (Taylor Wimpey RPLP/2049). It seeks a provision which is far in excess of that found acceptable and viable in London policy requirements and therefore the policy is not sound. (Taylor Wimpey RPLP/2049, Gleeson Developments/Avant Homes RPLP/1355). Policy promoting use of electric vehicles is likely to become quickly out-of-date with rapidly evolving technology and 	Policy T10 is justified by the UK Action Plan for Nitrogen Dioxide which highlights the need for action to be taken in Basildon to alleviate air quality. Furthermore, this plan provides homes and other buildings that will hopefully still be standing in 100 year's time. The national aim is to phase out petrol and diesel by 2040, and therefore developments provided now need to be ready. The Council is therefore satisfied that this policy is justified. In terms of comparison with the London Plan, evidence indicates that car ownership is far higher in Basildon than in London, so the comparison is not relevant as it would deliver an ineffectively low level of points relative to what is needed.

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	 standards set out in criteria 1f, g and h should be removed. (Redrow Homes Ltd RPLP/2214). No evidence to justify 50% of off-plot or communal spaces to be served by an active charging point, or how these will be managed, impact on viability or implications for street scene. (Redrow Homes Ltd RPLP/2214, Pigeon (Wickford) Ltd RPLP/2236). Active and passive charging points need to be defined in supporting text of policy. (Redrow Homes Ltd RPLP/2214). Queries whether the requirement for electric vehicle charging points as this is not based on evidence of need in Basildon Borough. Suggests the 1 space per unit is not based on need and the 50% requirement for parking in communal areas should be changed to 1 charging point or more providing the block of properties is managed. (Countryside Properties (UK) Ltd RPLP/1318, Gleeson Developments/Avant Homes RPLP/1355). Modification/s requested: There is no quantifiable evidence to support a requirement for one passive charging point per dwelling and 50% for off plot parking. (Pigeon (Wickford) Ltd RPLP/2236). Suggests the 1 space per unit is not based on need and the 50% requirement for parking in communal areas should be changed to 1 charging point or more providing the block of 	Active charging points are fully wired and ready to use whereas at passive charging points, the infrastructure is installed but electricity supply not activated and necessary charging equipment may not be supplied and could be added later at the property owner's expense. The Council does note that there is a need to define the difference between active and passive charging points in the supporting text, and would support a modification for this purpose. Furthermore, it is noted that the costs associated with this policy were not factored into the viability assessment, and additional evidence will therefore be prepared for the examination in this regard. Comments were received relating to electric cars and associated infrastructure. Electric cars are undoubtedly the expectation for future

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	 properties is managed. (Countryside Properties (UK) Ltd RPLP/1318). Active and passive charging points need to be defined in supporting text of policy. (Redrow Homes Ltd RPLP/2214). 	car ownership and currently demand for electric cars is being constrained by a lack of charging points. Therefore it would be safe to assume that the need for charging points will match the demand for cars in the not too distant future if reducing the impact of climate change remains a priority for us all. Therefore, the policy matches the ambitions of Government policy and the requirement in the NPPF to support more sustainable modes of transport.
Paragraph 9.104 Policy T11: Access for Servicing	 Objection: Recommend reference is made to air quality and the ongoing work between BBC and ECC in response to the UK air Quality Action Plan for Nitrogen Dioxide (2017). (Essex County Council RPLP/1763). Modification/s requested: Reference to be made to air quality and the ongoing work between BBC and ECC in response to the UK air Quality Action Plan for Nitrogen Dioxide (2017). (Essex County Council RPLP/1763). 	The Council agrees that vehicles involved in servicing are typically higher polluters and therefore it is agreed that the work being undertaken by BBC and ECC in respect of the UK Air Quality Action Plan for Nitrogen Dioxide should be reference in the supporting text.

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Chapter 10: Supp	orting High Quality Communications Infrastructure	
Policy COM1: Digital Communications Infrastructure Capacity	Support: • In general support of the policy. (Rochford District Council RPLP/1655).	
Policy COM3: Digital Communications Infrastructure in New Residential and Commercial Developments	 Objection: The responsibility for providing mobile phone coverage rests with the mobile phone operators, and an applicant/developer has no ability to deliver mobile phone coverage. This aspect of the policy is therefore unreasonable and undeliverable, and should be deleted. (Countryside Properties (UK) Ltd RPLP/1319, Gleeson Developments/Avant Homes RPLP/1348, Taylor Wimpey RPLP/2046). This policy is more appropriate to service providers and not developers and should be identified as such. (Redrow Homes Ltd RPLP/2215). Modification/s requested: Delete reference to reference to 4G mobile coverage in policy COM3. (Countryside Properties (UK) Ltd RPLP/1319, Gleeson Developments/Avant Homes RPLP/1348, Taylor Wimpey RPLP/2046). 	It is agreed that clarity should be provided on the role of developers have in delivering 4G mobile phone coverage. Supporting High Quality Communications Infrastructure is integral to creating sustainable and successful communities in Basildon Borough, and the Council will support proposals which install new, or improve existing, communications infrastructure and developers will be expected to facilitate or contribute to the delivery if the site they are bringing forward has poor coverage. It is the Council's view that new homes should be digitally connected to be sustainable in the 21st century.

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	As developers are not the service providers this policy should be identified as such. (Redrow Homes Ltd RPLP/2215).	With regard to broadband, this is considered an essential utility by the Council in respect of providing the conditions necessary for sustainable places in the 21st Century. The council expects provision of broadband infrastructure as part of new developments prior to occupation, to enable new residents and businesses to be connected to the facility as soon as they move in. The IDP states that both Virgin Media and BT Open Reach state that provision of broadband is provided wherever there is a demand and BT Open Reach will supply fibre to the premise superfast broadband for free on any development proposals of 30 dwellings or more. This means that the majority of sites contained within the Basildon Borough Local Plan will be provided with Superfast broadband without the need for additional intervention or investment. For developments of less than 30 dwellings, developers will be expected to facilitate or contribute to the development of enabling infrastructure.

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Chapter 11: Delive	Chapter 11: Delivering a Wide Choice of High Quality Homes		
Chapter 11: Delivering a Wide Choice of High Quality Homes	 Support: Support for approach to meeting housing need migrating from London. Support for the removal of former H11 Land at Benson Farm. Objection: Objection to principle of development in Billericay. Objection to site allocations on the grounds of insufficient infrastructure improvements proposed. Negative impact on house prices. Trip rate methodology is flawed (Billericay District Residents Association RPLP/4963). No accident risk assessment. (Billericay District Residents Association RPLP/4963). Transport Assessment for the Local Plan is unsound. (Billericay District Residents Association RPLP/4963). Western Link road does not meet Essex Design Guide. (Billericay District Residents Association RPLP/4963). Modification/s requested: Notes that the SA identifies potential significant adverse impacts on ecological features and that some of these sites trigger our impact risk zones. Many of these allocations also 	The Council is satisfied that the policies in Chapter 11 are in general conformity with the Revised NPPF, having been reviewed for this purpose prior to reporting to Committee and Council in October 2018. The housing allocations in the Local Plan have been informed by an extensive evidence base covering sustainability appraisal, environmental matters, Green Belt and landscape impact, infrastructure impact and mitigation and considerations of deliverability. These considerations were drawn together in the Housing Options Topic Paper, and subject to a robust and transparent decision making process. The Council is therefore satisfied that these allocations are sound, and the concerns raised have been addressed or are otherwise capable of mitigation through well-designed development. No amendments to the plan are therefore required in	

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	 fall within the Zone of Influence for the Essex RAMS. Natural England commends inclusion of details of ecological features to be retained but advises that the delivery and funding of mitigation to address impacts on biodiversity, and in particular those on designated sites, should be clearly specified within the relevant policies. (Natural England RPLP/2552). Change appropriate references to Education and Childcare provision. (ECC RPLP/1766). Lack of reference to sustainable modes of transport set out in section 9 of THIA (ECC RPLP/1767). H7-H20 should include a specific commitment towards achieving net gain in biodiversity (Essex Wildlife Trust RPLP/1833). Review wording to identify any heritage assets affected by proposed development and any potential mitigations within policy. (Historic England RPLP/2145). Claims Chapter 11 is unsound as it does not reflect NPPF2 (Redrow Homes RPLP/2216). 	respect of the objections raised. This applies to all housing sites allocated in Billericay as well as more generally across the Borough. With regard to the comment received in respect of the impact of new homes on house prices, growth in an area can stimulate the market and have a positive impact on values. That being said, sufficient supply in a local housing market can also act to minimise excessive inflation by improving the balance between supply and demand, which would seem to be the aim of national policy in the NPPF which expects an uplift in provision to address market conditions. No amendment to the Local Plan is therefore appropriate in respect of this objection. A series of objections have also been made to Chapter 11 in relation to the robustness of the Transport Modelling, and transport mitigation proposals. The Council is satisfied that the transport modelling undertaken for the Transport

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		and Highway Impact Assessment is robust, having been undertaken by specialists in consultation with the Highway Authority.
		Natural England have made a general comment seeking reference to the impact of development on designated sites within allocation policies. However, all potential strategic sites were subject to Ecology Appraisals to ensure that they would not have a significant impact on wildlife, especially designations, if brought forward for development. These appraisals were used to identify the extent of the development locations, and also to identify any mitigation required within the respective site allocation policies. It is considered that very few of the allocations would have a direct effect on a designated site, and where this is the case this is already referenced. No amendment is considered necessary in respect of this comment.
		Similarly, Essex Wildlife Trust seek each allocation policy to be modified to include

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		reference to the need to achieve Biodiversity Net Gain. This is a DM requirement in policy NE4, and it I therefore considered unnecessary to repeat this requirement for every allocation. The Council does not therefore feel this amendment is appropriate. Historic England meanwhile seek each housing allocation policy to be reviewed and modified to identify any heritage assets affected by proposed development and any potential mitigations required. Policies have been reviewed to ensure any nearby heritage assets are identified in the supporting text, and on-site assets are included in the policies. However, the details of mitigation will be dependent on the development design and layout. When the plan is read as a whole the DM requirements set out in policy HE3 address this matter. The Council does not therefore feel this amendment is appropriate.

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		It is however agreed that a consistent approach to the referencing of Education and Childcare is needed throughout the chapter. However, sites H5, H7 H11 and H17 should continue to refer to Primary and Early Years as these are specific on-site requirements.
Policy H1: Housing Strategy	 Objection: Objection to scale of development in the Green Belt. Objection to scale of housing need being allocated to be met via Neighbourhood Plans. The Plan will not deliver the full affordable housing need across the Borough within the plan period. (Gladman Developments Ltd RPLP/2024). The Plan does not meet the OAN (Land Group Billericay Ltd RPLP/1437). Selection on OAN over Standard methodology not justified or explained Objection to not allowing for windfall within the five years to 2023. Windfall Report takes averages of 80 dwellings PA rather than most recent recorded of 119 dwellings PA. No consideration of Part 2 brownfield register. No reference to optimum density for residential development. 1. c of H1 has not been carried though to selection of site policies, particularly H18. 	The Council has calculated its housing need having regard to national planning policy and the level of housing need identified within the Local Plan is therefore sound. The national Planning Practice Guidance is clear that the calculation of need should not take into account constraints. The OAN emerging from the Standard Methodology broadly aligns with the need arising from the SHMA Addendum 2017 previously undertaken. The SHMA Addendum therefore continues to provide a reasonable evidence base in relation to the need for affordable and specialist housing types. In terms of the Local Plans proposals for development in the Green Belt, the need

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	 Unsound as it is inconsistent with national policy and is unjustified and lacks the necessary robust evidence. (Wick 3 Nominees Ltd RPLP/1957, Persimmon Homes RPLP/2053). Appendix 3 is not in line with H1. (Bellway Homes and Crest Nicholson RPLP/2249). Number of units to be accommodated should be increased and the reference to a Masterplan and Local Centre should be removed. (Blue House Estate Limited and Gilbert Commercial Properties Limited RPLP/2103). Modification/s requested: Housing sizes should be provided in H1 as well as H25. (Billericay District Residents Association RPLP/1629). Impact of infrastructure constraints on housing delivery should be included in H1. (Rochford DC RPLP/1656). Statement 3(d) should be amended to require a measurable net gain in biodiversity. (Essex Wildlife Trust RPLP/1832). Commit to the positive progression of the JSP to address unmet need within the plan period, with its adoption aimed at Autumn 2020 (Gleeson Developments Ltd RPLP/1865). Policy does not give sufficient support for redevelopment and rebuilding of upper floors of town centre buildings for residential use. (Arcadis RPLP/2205). No reference made to keyworker housing or affordable schemes specifically to attract healthcare staff. (NHS England RPLP/2502). 	for this to occur has been determined having regard to the 'Calverton Tests' and the tests set out in the NPPF. The Council is therefore satisfied that the exceptional circumstances exist to amend the Green Belt boundaries for development needs. Extensive consultation on this matter occurred in relation to the Revised Preferred Options Core Strategy, the Draft Local Plan and the New and Alternative Sites consultation. The Council is satisfied that it has been through a robust and transparent process to identify sites to meet its housing need. However, having regard to sustainability, Green Belt and infrastructure constraints it is considered that the supply is constrained. There is a criticism that windfall is not included for the first five years of the plan. This is consistent with National Policy. The allowances that has been made is calculated based on evidence in the Windfall Assessment. There is also a

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	 Policy SD1 referral to provision of land for 17,791 homes is misleading as Policy H1 refers to the delivery of 15,465 dwellings. Delegating the identification of sites and associated major changes to green belt boundaries to a Neighbourhood plan is not consistent with NPPF and there is a high likelihood of failure to deliver 1350 dwellings. (Halsbury Homes Ltd RPLP/1393). 	criticism that there is no reference to the Brownfield Register. The Brownfield Register is a component of the HELAA, derived from it. Policy IMP1 Part 4 indicates the Council will use 'Permission in Principle' to bring forward appropriate sites in the urban area. This will result in a Part 2 Brownfield Register in time. The challenge is also made that the affordable housing target will not be reached. It is recognised that the target is challenging, but this will help to drive a shift change in provision across the Borough. Additionally, the Council will use its own housebuilding company to drive up provision on sites it brings forward. Comments have been made on densities and the level of delivery. It is considered that the plan, and policy H1 is clear that effective use should be made of land, and consequently no amendment is considered appropriate.

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		A series of modifications have been sought in respect of policy H1. These are not supported by the Council for the following reasons:
		 Housing sizes should be provided in H1 as well as H25 - this would be unnecessarily repetitious as the plan should be read as a whole. Impact of infrastructure constraints on housing delivery should be included in H1 - this is covered in part 3a of the policy already. Part 3(d) should be amended to require a measurable net gain in biodiversity - this is covered in policy NE4 already. Commit to the positive progression of the JSP - this is in policy SD1 already. Policy does not give sufficient support for redevelopment and rebuilding of upper floors of town centre buildings for residential use

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		 this is covered by part 1b of policy H1 already. No reference made to keyworker housing or affordable schemes specifically to attract healthcare staff - Homes delivered in accordance with paragraph 2.b will include homes prioritising local key workers. Policy SD1 referral to provision of land for 17,791 homes is misleading as Policy H1 refers to the delivery of 15,465 dwellings – policy SD1 also refers to delivering 15,465 homes.
		Comments also question the appropriateness of delegating a large housing target to Bowers Gifford and North Benfleet for delivery through a Neighbourhood Plan. The Council supports localism and the opportunity for neighbourhoods to secure their own destiny. However, it is recognised that there are delivery challenges related to this, hence the safeguards included in policy SD3.

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Policy H2: Specialist Accommodation for Older People and Disabled Adults	 Support: Support for policy H2. (Rochford District Council RPLP/1657, Gleeson Development Ltd RPLP/1873, Wick 3 Nominees Ltd RPLP/1936, AMS Care RPLP/2076, Persimmon Homes RPLP/2080, Countryside Properties RPLP/1321, Martin Grant Homes Ltd RPLP/1783, Taylor Wimpey RPLP/2020). Objection: Inflexibility will prevent sustainable development (Gleeson Development Ltd RPLP/1873) Other comment/s: 	The Council notes the objections to this policy. Older people's accommodation is calculated as a part the overall housing supply in the SHMA, accounting for around 10% of the total housing units required by 2034. It is considered reasonable that this requirement is secured proportionately on larger sites as it enables older people to live within the wider community and pursue active social and physical lifestyles
	 Older people housing should be concentrated in a retirement village Modification/s requested: Paragraph 11.24 is modified to cross refer to Policy H25. (Gleeson Development Ltd RPLP/1873, Wick 3 Nominees Ltd RPLP/1936, AMS Care RPLP/2076, Persimmon Homes RPLP/2080, Countryside properties RPLP/1321, Martin Grant Homes Ltd RPLP/1783, Taylor Wimpey RPLP/2020). 	The modification sought by a number of consultees in respect of paragraph 11.24 is supported by the Council as it clarifies what is meant and stated in policy H25.
Policy H3: Gypsy, Traveller and Travelling Show people	Support: • General support for policy H3. (Rochford District Council RPLP/1658).	It is noted that the evidence base for this policy has been questioned. The evidence of need was produced by ORS, whose work has been found sound across the Country as one of just a

Section/Para/ Policy	Summary of Responses	Council's response
Accommodation Strategy	 Welcomes the reference to working with neighbouring authorities to address G&T needs across the region. (Rochford District Council RPLP/1658). Objection: Additional plots would create imbalance between settled community and G&T provision. Unclear policy for G&T who fail the G&T test. No provision for providing pitches for those with a cultural need as part of the other housing policies. Local Plan fails to meet the requirements of PPTS in that the Gypsy and Traveller need assessment (GTAA) does not provide a robust evidence base to establish the need for Traveller pitches. Robustness of the evidence base due to poor interview rate, unsubstantiated assumption that only 10% of unknown households will have G&T status, failure to make an allowance for in migration, inadequate assessment of household formation rates, failure to publish results of Traveller status on a site by site basis, so that this can be checked. The absence of an analysis of planning applications/enforcement cases to inform the assessment. Lack of contingency plan. Tolerated sites can be occupied by anyone as no restriction to G&T. 	handful of consultants to undertaken such assessments. It is also consistent with the work undertaken across Essex on this matter and secured an interview rate higher than that achieved elsewhere as a consequence of the Council getting additional round of interviews undertaken, surveying in winter months, and by employing an advocate to assist with the interview process in those parts of the Borough where the relationship with the Traveller community has been impacted by past enforcement action. The site provision work meanwhile has been undertaken by PBA, by an expert in this area, and is again considered robust having been based on a clear methodology that reviewed all sites promoted for this purpose, following a Call for Sites process. Having regard to the evidence, the Council is satisfied that the approach set out in policy H3 secures a five year supply of land for meeting the needs of Gypsies and Travellers, in locations they already call home, making use of land

Section/Para/ Policy	Summary of Responses	Council's response
	 Policy H24 re windfall sites is restrictive and rule out all Green Belt locations which are not allocated. Plan does not identify sufficient Traveller sites and fails to assess and allocate any transit site. Unacceptable that assessment of transit sites is not possible. A detailed appraisal was carried out by ORS as part of the Essex wide need assessment which found a high and increasing need for transit provision. The 2014 study recommend that provision be determined through discussions between local authorities and recommended that 2 publicly provided sites be provided. No such provision has been made. Do not believe G&T site at Gardiners Lane has covenants preventing planning permission for sites. Additional plots would create imbalance between settled community and G&T provision. Lack of consultation. 	which is already in use rather than eroding the quality of greenfield Green Belt sites. It is noted that there is some preference for providing pitches alongside housing on allocation sites, and this was the approach proposed in the revoked March 2018 Publication Local Plan. However, that approach did not deliver a five-year supply of land for this purposes, and would have seen the Council unable to work with the Traveller community to resolve enforcement issues in the early part of the plan period.
	 This does not comply with NPPF & PPTS. Other comment/s: Requests further clarification on how the unmet need for Gypsy and Traveller accommodation will be met during the plan period. (Epping Forest District RPLP/1827). Epping Forest District is unable to assist Basildon Borough in meeting its Gypsy and Traveller needs. (Epping Forest District RPLP/1827). 	It is noted that at this time the approach does not meet the full objectively assessed need for the plan period. However, the policy does make clear that the Council will work with the Neighbourhood Areas and neighbouring authorities to address this need in the longer term. However, as the plan makes provision for a five year supply, the Council is satisfied policy H3 is appropriate at this time.

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	 The Council should also reference its intention to work with the Greater Essex authorities and other relevant bodies, on transit sites. (Rochford District Council RPLP/1658). Review H3 once H4 is agreed upon. H3.2 may require a caveat that no further provision to be made in HHNA (HHNF RPLP/1716). 	Neighbouring authorities have sought some clarification on this longer term approach. In January 2019, the EPOA agreed an unmet need protocol for the Essex authorities which details how this should work, and it is agreed that this
	 Modification/s requested: Do not legalise current illegal sites. Adopt a site based policy. Reconsider sites in the previous version of the DLP. Insert wording that no unauthorised G&T sites will be considered if it would create a community imbalance Distribute pitches evenly across boroughs. Set out how to ensure adequate transit provision is made available now. Remove Policy H3. Provide further clarification on how the unmet need for Gypsy and Traveller accommodation will be met during the plan 	should work, and it is agreed that this should be referenced in the supporting text to policy H3 to satisfy the issues raised by these consultees.
	 period. (Epping Forest District RPLP/1827). The Council should also reference its intention to work with the Greater Essex authorities and other relevant bodies, on transit sites. (Rochford District Council RPLP/1658). Reference EPOA Essex Guidance on unmet G&T provision. (Chelmsford City Council RPLP/1639). 	

Section/Para/ Policy	Summary of Responses	Council's response
Policy H4: New Gypsy and Traveller and Travelling Showpeople Plot Provision	 Support: General support for policy H4. (Rochford District Council RPLP/1659). Objection: Do not legalise current illegal sites. Additional plots would create imbalance between settled community and G&T provision. Unclear policy for G&T who fail the G&T test. No provision for providing pitches for those with a cultural need as part of the other housing policies. Local Plan fails to meet the requirements of PPTS in that the Gypsy and Traveller need assessment (GTAA) does not provide a robust evidence base to establish the need for Traveller pitches. Robustness of the evidence base due to poor interview rate, unsubstantiated assumption that only 10% of unknown households will have G&T status, failure to make an allowance for in migration, inadequate assessment of household formation rates, failure to publish results of Traveller status on a site by site basis, so that this can be checked. The absence of an analysis of planning applications/enforcement cases to inform the assessment. Lack of contingency plan. Tolerated sites can be occupied by anyone as no restriction to G&T. 	It is noted that the evidence base for this policy has been questioned. The evidence of need was produced by ORS, whose work has been found sound across the Country as one of just a handful of consultants to undertaken such assessments. It is also consistent with the work undertaken across Essex on this matter and secured an interview rate higher than that achieved elsewhere as a consequence of the Council getting additional round of interviews undertaken, surveying in winter months, and by employing an advocate to assist with the interview process in those parts of the Borough where the relationship with the Traveller community has been impacted by past enforcement action. The site provision work meanwhile has been undertaken by PBA, by an expert in this area, and is again considered robust having been based on a clear methodology that reviewed all sites promoted for this purpose, following a Call for Sites process.

Section/Para/ Policy	Summary of Responses	Council's response
	 Policy H24 re windfall sites is restrictive and rule out all Green Belt locations which are not allocated. Plan does not identify sufficient Traveller sites and fails to assess and allocate any transit site. Unacceptable that assessment of transit sites is not possible. A detailed appraisal was carried out by ORS as part of the Essex wide need assessment which found a high and increasing need for transit provision. The 2014 study recommend that provision be determined through discussions between local authorities and recommended that 2 publicly provided sites be provided. No such provision has been made. Additional plots would create imbalance between settled community and G&T provision. Lack of consultation. Curtilage and boundary issues. Traveller sites within the Green belt is inappropriate development (PPTS). Previous planning applications have been refused on the grounds that the land is in the Greenbelt. Readers yard and Willows should be treated as one site. Other comment/s: Reassess strategic housing sites for potential inclusion of pitch provision. (Thurrock Borough Council RPLP/854). To modify and meet soundness would be for the Parish Council, who it has been agreed as part of the Local Plan 	Having regard to the evidence, the Council is satisfied that the approach set out in policy H3 secures a five year supply of land for meeting the needs of Gypsies and Travellers, in locations they already call home, making use of land which is already in use rather than eroding the quality of greenfield Green Belt sites. It is noted that there is some preference for providing pitches alongside housing on allocation sites, and this was the approach proposed in the revoked March 2018 Publication Local Plan. However, that approach did not deliver a five-year supply of land for this purposes, and would have seen the Council unable to work with the Traveller community to resolve enforcement issues in the early part of the plan period.

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Policy	allocation, to oversee development within the Parish and to find an alternative site, within the existing area and time period as part of their emerging Neighbourhood Plan thus complying with HELAA Methodology in regard to land interest. (Bowers Gifford & North Benfleet Parish Council RPLP/3685). Provide compensation to existing residents. Modification/s requested: Reconsider sites in the previous version of the DLP. Insert wording that no unauthorised G&T sites will be considered if it would create a community imbalance. Distribute pitches evenly across boroughs. set out how to ensure adequate transit provision is made available now Remove Policy H4. Provide clarity on the 2 pitch site. Increase brownfield sites. Policy H4 requires extensive revision to take account of the issues identified in Representation 4. (The Gypsy Council RPLP/3225 and Dale Farm Residents Group RPLP/3224).	
	accommodation is compliant with the Caravan Sites Act and Building Regulations. (The Gypsy Council RPLP/3222 and Dale farm Residents Group RPLP/3216)	
Policy H5: Land west of Gardiners	Support:	The Council notes that principle of this allocation is by and large supported.

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Lane South, Basildon	 Support the policy H5 site allocation. (Lichfields, RPLP/2264. Homes England RPLP/1424). Support the relocation of sports facilities at the policy H8 site allocation. (Sport England RPLP/818. Homes England RPLP/1424). Supports relocation of sports grounds as they are considered deliverable. (Sport England RPLP/818). Supports the fixed amount of sports pitches and supporting facilities, amenity open space, landscaping and drainage identified for the policy H5 site allocation. (Sport England RPLP/818). The site will contribute towards Basildon's OAN. (Homes England RPLP/1424). The landowner fully intends to develop the site and overcome any complex issues that could prevent delivery. (Homes England RPLP/1424). The site would be sustainable in transport terms. (Homes England RPLP/1424). Supports release of necessary Green Belt to meet housing need where evidence supports the case. (Homes England RPLP/1424). Supports the findings of the HLDF for H5. (Homes England RPLP/1424). Negative impact on the natural environment. Objection: 	However, it is also noted that there are some objections to the policy requirements. The policy requirements take into account the fact that the majority of the site is currently used for playing pitch provision, and there is a need to secure pitch relocation for this allocation to be delivered. A Playing Pitch Relocation Feasibility Assessment and a High Level Development Framework have been prepared to determine how this development could be brought forward in light of this. This evidence has been used to inform the policy, and with the exception of some minor amendments, Sport England have withdrawn their in principle objection to this allocation. The Council is not therefore minded to support amendments to this policy which would introduce flexibilities around the remaining on-site open space provision, as requested by the site promoter. Other amendments are supported by the Council however, namely:

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	 Objects to the fixed amount 9.9ha of sports pitches and supporting facilities, amenity open space, landscaping and drainage. (Lichfields RPLP/2264). Objection to the consultation process. The needs of existing residents of the site have not been considered. A masterplanned approach is needed. The site is ecologically sensitive. Other comment/s: The development will not impact upon the setting of a designated heritage asset, Holy Cross Church. (Historic England RPLP/2153). The developer intends to increase delivery speed where possible to aid delivery in the next five years. (Homes England RPLP/1424). A wooded area has been removed. Housing development on H5 will comply with design, tenure, type, affordable housing, open spaces, transport, health and recreation, drainage and flooding policies within the Local Plan. (Homes England RPLP/1424). There is a long history of proposals for this site not being delivered. Modification/s requested: 	 An amendment to paragraph 11.63 to state that in this location highways and transportation improvements will be required. An amendment to paragraph 11.56 to state that at least equivalent to the existing arrangements in relation to matters such as security of tenure, maintenance costs, management charges and community accessibility. An amendment to the supporting text to require the Masterplan to be informed by the PPS 2018.

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	 Sports pitches and supporting facilities, amenity open space, landscaping and drainage should be dependent on overall masterplan proposals. (Lichfields RPLP/2264). Greater emphasis should be placed on highway and transportation improvements, to recognise that this is to support the modal shift towards active and sustainable transport modes. (ECC RPLP/1768). Add sentence to end of paragraph 11.56: The management arrangements for relocated sports facilities must be at least equivalent to the existing arrangements in relation to matters such as security of tenure, maintenance costs, management charges and community accessibility. (Sport England RPLP/818). Reference to be given to the BFS/PPS 2018 within the supporting text, in particular that the Masterplan is being informed by the PPS 2018. (Sport England RPLP/818). Provide compensation for the existing residents. Protect the amenity of existing residents. Prepare a masterplan. 	
Policy H6: Land North of Dry Street, Basildon	 Support: Supports the policy H6 site allocation. (Redrow Homes (Eastern) Ltd RPLP/2198). Site H6 assists in the plan being positively prepared, justified, effective and consistent with national policy. (Redrow Homes (Eastern) Ltd RPLP/2198). 	The objections to this policy are noted, however this site already benefits from planning consent having been allocated in the Adopted Local Plan 1998. Modifications which seek to amend the approved plans cannot therefore be made.

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	Support for allocation for land without planning consent in this allocation (Stonebond Properties Ltd RPLP/2031).	
	 Objection: Objects to building on land at H6 as the hospital will not be able to expand. Land within this site without planning consent should not be developed, especially where it overlaps with Local Wildlife site allocations. Evidence espousing the merits of the land without planning consent in this allocation is provided (Stonebond Properties Ltd RPLP/2031). 	
	 Modification/s requested: Require multi-user links throughout the development. The bridleways which run through the site and link to adjacent networks should be protected (Essex Bridleway Association RPLP/358). Reference should be made to the preservation of grade II listed Dry Street Farmhouse as part of policy H6. (Historic England RPLP/2154). 	
Policy H7: Land North and South of London Road, Vange	Support: • The redevelopment of the H7 will bring much needed family housing and investment in community facilities. (Vange Primary School and Nursery RPLP/1377).	The housing allocations in the Local Plan have been informed by an extensive evidence base covering sustainability appraisal, environmental matters, Green Belt and landscape impact, infrastructure

Section/Para/ Policy	Summary of Responses	Council's response
	 Support for the broad land extent forming a proposed allocation within the Local Plan from the site promoter (Estate and Agency Strategic Land LLP RPLP/2131). Objection: H7 is unsound given that the extent of land allocated would not be sufficient to accommodate the proposed residential development of around 650 homes. Additional areas of land that were previously excluded from the allocation could be included. (Estate and Agency Strategic Land LLP RPLP/2131). Objection to the allocation of a Gypsy and Traveller site at H7. The housing allocation at policy H7 would lead to coalescence with Corringham. Objection due to current development underway at site H6. Combined this will cause congestion on Nethermayne. Concerned about proximity to the air ambulance helipad. Other comments: Evidence provided by site promoter of how development could be brought forward in this location. (Estate and Agency Strategic Land LLP RPLP/2131). Modification/s requested: Landfill should go to Southend and not to Pitsea. 	impact and mitigation and considerations of deliverability. These considerations were drawn together in the Housing Options Topic Paper, and subject to a robust and transparent decision making process. The Council is therefore satisfied that this allocation is sound, and the concerns raised have been addressed or are otherwise capable of mitigation through a well-designed development. No amendments to the plan are therefore required in respect of the objections raised. Some modifications are sought in respect of this allocation and policy however, which need separately addressing. Firstly, there is an assumption that a traveller site is proposed within this allocation. This is not stated in policy H7, and amendment to therefore remove the pitch provision is not necessary. Secondly, the site promoter is seeking a larger allocation. This will however bring

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	 Developer is promoting a larger extent of land at H7 - Land South of London Road, Vange, for housing development. (Estate and Agency Strategic Land LLP RPLP/2131). Reference should be made to the preservation of listed buildings and their settings as part of policy H7. (Historic England RPLP/2155). Remove policy H7 from the Local Plan on grounds that it will lead to a coalescence of Basildon and Corringham. 	in land designated as a Local Wildlife Site. This option was reviewed as part of the Housing Options Topic Paper, and found to be inappropriate given a revised site boundary can avoid this designation. Thirdly, the promoters have indicated that the site cannot accommodate the level of housing proposed at its current size. These calculations have been reviewed and it is considered that through optimal land use this level of provision can be achieved. Historic England meanwhile seek a modification to protect the listed building adjacent. This is covered in part 4 of the policy, and policy HE3 would apply. No further amendments to the plan are considered necessary in respect of this representation.
		The comment related to landfill at Pitsea is not relevant to this allocation, given it is some way away. However, it should be noted that the landfill has now closed,

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identify that a larger scale development

may be appropriate in this location if it were not for the risk of Green Belt

		and actions are now in train to bring about the re-use of the site.
Policy H8: West of Basildon	 Support: Support the necessity to limit the release of green belt in West Basildon. Support the relocation of sports facilities at the policy H8 site allocation. Support the allocation at policy H8. (Countryside Properties (UK) Ltd RPLP/1322, Homes England RPLP/1426). Support allocation H8 as it enables the re-provision of sporting facilities from allocation H5. (Homes England RPLP/1426). Objection: Objects to the allocation policy H8 due to coalescence. (Dunton Community Association RPLP/1981). Objects to the amendment to the Green Belt boundary in the area of allocation H8. (Dunton Community Association RPLP/1981). Objects to the increase in the number of houses in Dunton Wayletts. (Dunton Community Association RPLP/1982). 	The housing allocations in the Local Plan have been informed by an extensive evidence base covering sustainability appraisal, environmental matters, Green Belt and landscape impact, infrastructure impact and mitigation and considerations of deliverability. These considerations were drawn together in the Housing Options Topic Paper, and subject to a robust and transparent decision making process. The Council is therefore satisfied that this allocation is sound, and the concerns raised have been addressed or are otherwise capable of mitigation through a well-designed development. No amendments to the plan are therefore required in respect of the objections raised.
	Objects to allocation H8 as well as Dunton Hills Garden Village and a potential site at Dunton in the Thurrock boundary, the impact on infrastructure needs to be fully considered. (Dunton	In relation to this site specifically, the Housing Options Topic Paper does identify that a larger scale development

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	 Objects to the allocation H8 as it will have a negative effect on the character of the existing Dunton Park. (Dunton Community Association RPLP/1984). Objects to the amendment to the Green Belt boundary in the area of allocation H8 on the grounds that the Green belt boundary will no longer be clearly defined by permanent physical features. (Dunton Community Association RPLP/1986). Objects to the playing fields in allocation H8 being removed from the Green Belt. (Dunton Community Association, RPLP/1988). Objects to the allocation H8 due to the impact on air quality. (Dunton Community Association RPLP/1989). Objects to the allocation H8 due to transport concerns on and around Lower Dunton Road. (Dunton Community Association RPLP/1992). Objects to the allocation H8 due to the housing being aimed at commuters and being unaffordable. (Dunton Community Association RPLP/1993). Objects to the allocation H8 due to the housing being at risk of flooding. (Dunton Community Association RPLP/1994). Objects to the allocation H8 due to the impact on the historic environment. (Dunton Community Association RPLP/1995). Concern raised that the removal of Dunton Park from the Green Belt will encourage redevelopment of the site. (Dunton Community Association RPLP/1997). 	coalescence potential arising from the proposals in the Brentwood Local Plan. The allocation at H8 has therefore been substantially reduced compared to the Draft Local Plan in order to minimise this risk, with the Green Belt Topic Paper concluding that the Lower Dunton Road forms a robust boundary from which to defend against coalescence. The use of this boundary also justifies the removal of the caravan park from the Green Belt. As this is already intensely occupied the impacts of this action on the openness of the Green Belt, or the purpose of including land within it is limited. There are no indications this will result in the redevelopment of the caravan park which is already in residential use, as park homes remain a popular choose for retirees to South Essex. A series of modifications are sought in respect of policy H8. The Bridleway Association seeks for the protection of the bridleway on this site. Policy T3 will secure this, so no amendment is required in respect of policy H8.

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	 Objects to the scale of development in this area. (Dunton Community Association RPLP/1982). A new secondary school is needed in West Basildon. Development in this location will have impacts on nature conservation and ecology. Objection to the reduction in the scale of allocation in this location, as other land is available in this location which is considered suitable and available for development and would deliver a significant proportion of the unmet need. (Persimmon Homes RPLP/2081, Bellway Homes and Crest Nicholson RPLP/2250). 	Sport England seek this allocation to be linked to the proposed village in Brentwood by a multi-user route. The work on the Dunton Landscape Corridor indicates where this will be, however the provision of such a route is ultimately dependent on Brentwood who are creating the stand-alone village. Ongoing engagement is underway to address issues such as this.
	Other comments: • Whilst not extending to the Borough Boundary there is the potential for conflict with the emerging Dunton Hills Garden Village proposal in the Brentwood Local Plan. (Rochford District Council RPLP/1660).	Countryside Properties have sought clarity within paragraph 11.75 as to the amount of open space required. It is agreed that this amendment should be made.
	 Modification/s requested: The bridleways which run through the site and link to adjacent networks should be protected and enhanced. (Essex Bridleway Association RPLP/363). Policy should demonstrate collaboration with Brentwood District Council in respect of linking proposed development sites by off-road multi-user routes. (Sport England RPLP/819). 	Countryside Properties have also sought an amendment to paragraph 11.80 improvements on grounds that the developer will be providing the junction improvements. This amendment is therefore supported by the Council. Countryside Properties have also proposed some minor wording changes

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	 Concern raised that engagement is needed with Brentwood Council in relation to the neighbouring authority's Dunton Hills Garden Village. (Rochford District Council RPLP/1660). The policy should be amended to provide clarity on the amount of open space required in line with what is set out in paragraph 11.75. (Countryside Properties (UK) Ltd RPLP/1322). (Policy H8) should be removed from the Plan. Developer is promoting larger extent of land at H8 - West Basildon for housing development. (Persimmon Homes RPLP/2081). Reference should be made to the preservation of grade II listed buildings as part of policy H8. (Historic England RPLP/2156). Queries the reference to contributions towards junction improvements in paragraph 11.80. (Countryside Properties (UK) Ltd RPLP/1324). Some minor clarification is sought in parts 1 and 2 of the policy regarding the relationship between the open space provision and the housing allocation (Countryside Properties (UK) Ltd RPLP/1322). 	to parts 1 and 2 of the policy, which the Council agrees provide clarity. Historic England meanwhile have sought reference to Grade II listed buildings. This is however already detailed in the supporting text with a specific requirement to respect the historic environment in Part 4 of the policy. Policy HE3 also applies. No further amendment is considered necessary.
Policy H9: Land West of Steeple View, Laindon	 Support: Support the allocation policy H9 due to its sustainability. (Bloor Homes Eastern RPLP/2092). Support development at allocation H9 as it will not compromise the purposes and function of the Green Belt. (Bloor Homes Eastern RPLP/2092). 	The housing allocations in the Local Plan have been informed by an extensive evidence base covering sustainability appraisal, environmental matters, Green Belt and landscape impact, infrastructure impact and mitigation and considerations

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	 Objects to the loss of the fields and wildlife habitats at H9. Impact of growth on congestion around the Noak Bridge School. Impact of development in this location on Dunton Road which is a country lane. Other comment/s: The Council is not able to meet its OAN within the plan period. (Bloor Homes Eastern RPLP/2092). The site at allocation H9 could be built out within the first five years of the plan. (Bloor Homes Eastern RPLP/2092). Modification/s requested: Propose that a higher number of dwellings could be delivered at allocation H9 (Bloor Homes Eastern RPLP/2092). Request greater clarity on the educational contributions required as part of development at H9 (Bloor Homes Eastern RPLP/2092). Air quality restrictions within policy H9 are not appropriate or justified. (Bloor Homes Eastern RPLP/2092). Reference therefore to a density of 35 duph should be removed. (Bloor Homes Eastern RPLP/2092). Acknowledgment should be made in the policy of the benefits of providing other sustainability measures as part of a planning 	of deliverability. These considerations were drawn together in the Housing Options Topic Paper, and subject to a robust and transparent decision making process. The Council is therefore satisfied that this allocation is sound, and the concerns raised have been addressed or are otherwise capable of mitigation through a well-designed development. No amendments to the plan are therefore required in respect of the objections raised. It is noted that a larger allocation for housing growth is being promoted in this location by the promoter of allocated site. The Council's evidence base does not currently support the allocation of these sites. The sites were tested as part of the 26 Broad Locations used to consider alternative ways of distributing development in the Green Belt, as set out in the SA for the Core Strategy Revised Preferred Options Report (2013). This included consideration of environmental issues, infrastructure, deliverability and Sustainability

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	 application such as passive and active measures, including car charging points. (Bloor Homes Eastern RPLP/2092). Requests greater clarification on the education solution and evidence of its viability and achievability. (Bloor Homes Eastern RPLP/2092). Reference should be made to the preservation of grade II listed buildings as part of policy H9. (Historic England RPLP/2157). Remove requirement to increase the number of pupils at Noak Bridge School. 	Appraisal. The development of these sites was however discounted by the Council and has not been taken forward in the development of site allocations. Any approach taken in considering these sites further will need to be subject to the same suite of evidence base as with the rest of the housing site allocations. The promoter has also sought amendments to policy H9. It is considered that the policy requirements are reasonable and therefore the amendments sought are not considered agreeable to the Council. Matters related to the education requirements are set out in the IDP, which is a living document and will be updated as more details become available. Meanwhile, the Air Quality restriction is justified as a consequence of the UK Air Quality Action Plan and associated modelling which shows the EU Limit Value for NOx being exceeded on the A127 at the nearby Fortune of War junction. In the Council's view it is not appropriate to accommodate new homes in an area

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		where air quality is known to be bad, until such time as it has been improved. This is consistent with the NPPF.
		The Council does however agree that clarifications should be made in respect of paragraphs 11.87 regarding developer contributions, and also in respect of part 6 of the policy, to make it clear that both Primary and Early Years provision needs to be adequately addressed.
Policy H10: Land East of Noak Bridge, Basildon	 Support: Support the allocation H10 and the findings of the Housing Options Topic Paper which supports provision of up to 400 dwellings. (Croudace Homes RPLP/1905). Objection: Objects to the allocation H10 due to loss of Green Belt and open space, the need costly infrastructure to mitigate noise and air quality issues and the impact on existing nature reserve. (Noak Bridge Parish Council RPLP/1032). Objects to the allocation H10 in relation to the educational requirements associated with it and the lack of capacity to extend the existing school and associated viability, infrastructure and access issues. (Noak Bridge Parish Council RPLP/1032). 	The housing allocations in the Local Plan have been informed by an extensive evidence base covering sustainability appraisal, environmental matters, Green Belt and landscape impact, infrastructure impact and mitigation and considerations of deliverability. These considerations were drawn together in the Housing Options Topic Paper, and subject to a robust and transparent decision making process. The Council is therefore satisfied that this allocation is sound, and the concerns raised have been addressed or are otherwise capable of mitigation through a well-designed

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	 Concern raised over the pipeline within the site. (Noak Bridge Parish Council RPLP/1032). An additional 400 homes in Noak Bridge will negatively impact on the existing resident's health and well-being. (Noak Bridge Parish Council, RPLP/1032) Development will cause harm to the openness of the Green Belt. (Noak Bridge Parish Council RPLP/1032). Part of site H10 is in flood risk zone 3B – the risk has been underestimated. Omission site to the north of Wash Road is sequentially preferable due to flood risk considerations. (Southern and Regional Development Ltd RPLP/2094). Other comment/s: Development at H10 will require expansion of the GP surgery. (Noak Bridge Parish Council RPLP/1032). Existing road and footpaths near H20 need improving. Evidence provided by site promoter as to how their proposals meet the requirements of the plan (Croudace Homes RPLP/1891). Modification/s requested: Site H10 should be reconsidered as a site for a mixture of 	development. No amendments to the plan are therefore required in respect of the objections raised. It is noted that the Parish Council seek for this site to be specifically identified for the accommodation of older people. The allocation of the entire site for this purpose would not create a mixed community, and would be potentially in conflict with the NPPF. Furthermore, the promoter for this site, with development options does not support a scheme comprising this type of development only. This potentially renders such a proposal undeliverable. Historic England have sought for Listed Buildings to be addressed in the policy. These are included and named in part 4 of the policy and therefore the need for this amendment is questioned by the Council.
	homes for elderly people from the age of 55+ with a range of ability and disability. (Noak Bridge Parish Council RPLP/1032).	The Council notes that an alternative / additional site is being promoted nearby, to the north of Wash Road. It is noted

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	 Reference should be made to the buildings within part 4 of the policy as listed buildings. (Historic England RPLP/2158). Developer is promoting Land North of Wash Road, Basildon for housing development. (Southern and Regional Development Ltd RRLP/2094). 	that the site is sequentially preferable in flood risk terms. This site has been tested for accommodating housing development through the local plan preparation process, but was discounted. The final selection of housing sites allocated within the Revised Publication Local Plan have been informed by an extensive evidence base, drawn together in the Housing Options Topic Paper. The Housing Options Topic Paper draws together evidence related to housing capacity and constraints on growth, and gives an explanation on how the Council has considered all the housing site options, using the extensive evidence base available to inform their decisions.
Policy H11: East of Basildon	 Support: The requirements in the policy relating to the Masterplan and the requirements for a new community hub in paragraph 3 are broadly welcomed. (Sport England RRLP/820). Welcome reference to designated assets on the London Road. (Historic England/2159). A promoter with some land in this allocation considers that there site is deliverable, suitable and available. (Blue House Estate Ltd and Gilbert Commercial Properties Ltd RPLP/2103). 	The housing allocations in the Local Plan have been informed by an extensive evidence base covering sustainability appraisal, environmental matters, Green Belt and landscape impact, infrastructure impact and mitigation and considerations of deliverability. These considerations were drawn together in the Housing Options Topic Paper, and subject to a

Section/Para/

Section/Para/ Policy	Summary of Responses	Council's response
	 Principle of allocation is supported in principle. (BGNB Parish Council RPLP/3691). Objection: Objects to strategic site H11 due to loss of Green Belt barrier between Bowers Gifford and Pitsea. Negative impact on the natural environment. Objection to the reduction in this allocation compared to what was included in the Draft Local Plan, and the inclusion within the plan of a housing target for the Neighbourhood Area in lieu of a strategic housing allocation. This level of delegation is not considered appropriate. (Halsbury Homes Ltd RPLP/1394). Land promoted to the west of Bowers Gifford to assist with delivering the housing requirement of the Borough in order to improve plans soundness. (GL Hearn RPLP/2126). Reduced allocation to allow for neighbourhood plan housing target, does not reduce the need for infrastructure. A strategy is need to secure all the infrastructure needed in this area. (ECC RPLP/1771). This allocation cannot be delivered as a whole package and therefore the requirement for a masterplan should be removed and piecemeal development should be permitted. (Blue House Estate Ltd and Gilbert Commercial Properties Ltd RPLP/2103). The need for a local centre is not justified. (Blue House Estate Ltd and Gilbert Commercial Properties Ltd RPLP/2103). Concerns raised about the use of Eversley Road for access. 	robust and transparent decision making process. The Council is therefore satisfied that this allocation is sound, and the concerns raised have been addressed or are otherwise capable of mitigation through a well-designed development. No amendments to the plan are therefore required in respect of the objections raised. A Series of minor modifications to the supporting text and policy are proposed by Sport England and ECC to improve the compliance with the NPPF and to ensure delivery of the necessary infrastructure. The Council supports these amendments, with the exception of the requirement for the N-S link road which is not required to secure access to this allocation, as this can be taken from the London Road. The earlier allocations required an alternative to Pound Lane, justifying the link road. The Council also queries ECC concerns regarding the D1 allocation, which is clearly shown on the policies map.

Section/Para/ Policy	Summary of Responses	Council's response
Policy	 Objection to the proposed road identified as a bus link between Tyefields and Pound Lane. The inclusion of this road is a legacy of previous Local Plan proposals for Bowers Gifford & North Benfleet and is not justified. (BGNB Parish Council RPLP/3691). Other Comment/s: Green Belt coalescence between Bowers Gifford and Pitsea should be avoided. Modification/s requested: Policy H11 paragraph 4. *Replace "expected" with "required". (Sport England RRLP/820). No reference to Eversley Centre. Policy should state that the Council will retain security of tenure and other management related issues. (Sport England RRLP/820). Relocated facilities must meet Sport England design guidance. (Sport England RRLP/820). Policy should confirm that the development of the area proposed for residential should be planned to minimise residential amenity impact associated with the operation of Bowers & Pitsea FC facilities. (Sport England RRLP/820). BBC to work with ECC to clarify and develop clear delivery and funding strategy for the identified infrastructure requirements. (ECC RPLP/1771). 	Furthermore, it is agreed that the reference to historic assets in part 6 of the policy should be amended to heritage assets as requested by Historic England. Further amendments sought by Historic England are not however considered necessary given the policies in Chapter 17. In relation to the requirement for this site to contribute towards the 'grade separated junction' on the A127, this is justified by the Transport and Highway Impact Assessment. This shows that the junction and link roads will provide considerable congestion relief in both East Basildon and Wickford to enable growth to be accommodated. The testing of alternative options through the THIA did not identify alternatives which provided this relief. The housing target for East Basildon was derived from the East Basildon High Level Development Framework, which
		clearly demonstrates the potential for this area to accommodate a high level of

Section/Para/ Policy	Summary of Responses	Council's response
	 Change Policy H11 to Specify the allocation land for D1 education use as follows 2.1ha for a primary school (including associations early years and childcare) and a 10 ha Secondary school site meeting the criteria set out in ECCs Developers Guide to Infrastructure Contributions (2016). (ECC RPLP/1772). Specify designated assets historic assets on the London Road. (Historic England RPLP/2159). Change historic assets to heritage assets in line with NPPF. (Historic England, RPLP/2159). Policy H12 should be modified to remove the need to be aligned with a new grade separated junction on the A127. Where any requirement is stipulated within the RPLP, the evidence demonstrates that it should be ascribed to H11 East Basildon and not to South Wickford. (Pigeon (Wickford) Ltd RPLP/2226). Change Paragraph 11.103 second sentence by deleting reference to 1 form of entry. (ECC RPLP/1769). The housing number for the Bowers Gifford and North Benfleet Neighbourhood Area should be reduced to avoid coalescence. This allocation cannot be delivered as a whole package and therefore the requirement for a masterplan should be removed and piecemeal development should be permitted. (Blue House Estate Ltd and Gilbert Commercial Properties Ltd RPLP/2103). Specific criteria should be included in the policy with regard to road layout and access arrangements. 	growth whilst retaining functional separation between settlements. As this capacity can be demonstrated through evidence, it is appropriate that this Neighbourhood Plan makes provision for such capacity.

Section/Para/ Policy	Summary of Responses	Council's response
	 The Parish Council would support the development for a Public Right of Way for residents to use as a link between Tyefields and Pound Lane for the sole use of pedestrians and cyclists. (BGNB Parish Council RPLP/3691). The policy should clarify requirements for the provision of the North-South link road between the new Grade separated junction A127/Pound Lane to the B1464 (London Road). (ECC RPLP/1770). Change Policy H11 to Specify the allocation land for D1 education use as follows 2.1ha for a primary school (including associations early years and childcare) and a 10 ha Secondary school site meeting the criteria set out in ECC's Developers' Guide to Infrastructure Contributions (2016). (ECC/1772). 	
Policy H12: Land South of Wickford	 Support: Allocation supported by promoters. (Persimmon Homes RPLP/1965, Pigeon (Wickford) Ltd RPLP/2224). The allocation in suitable and available and considered to be deliverable now. (Persimmon Homes RPLP/1940. Pigeon (Wickford) Ltd RPLP/2224). Objection: Over development of area. Proposed infrastructure is not deliverable. Objection to scale of development in the Green Belt arising as a consequence of H12 and the broad location to the south of Wickford combined. (CPREssex RPLP/1878). 	The housing allocations in the Local Plan have been informed by an extensive evidence base covering sustainability appraisal, environmental matters, Green Belt and landscape impact, infrastructure impact and mitigation and considerations of deliverability. These considerations were drawn together in the Housing Options Topic Paper, and subject to a robust and transparent decision making process. The Council is therefore satisfied that this allocation is sound, and the concerns raised have been

Section/Para/ Policy	Summary of Responses	Council's response
	 Landowner to West of Cranfield Park Road seeks westward extension of allocation. Council has not properly addressed the Hovefield and Honiley Neighbourhood area, or the evidence it has produced in the plan. The policy is ambiguous in parts and not fully justified. (Pigeon (Wickford) Ltd RPLP/2224). Landscape evidence prepared by a promoter indicates a larger allocation is possible without impacting on Green Belt objectives. A masterplan has been prepared to this effect showing the potential for 1,400 homes. (Pigeon (Wickford) Ltd RPLP/2224). Further details are required in respect of the phasing of the delivery of the 'grade separated junction' on the A127. Contributions sought from developers for this junction should be proportionate and not render development unviable. There is a concern that relying on developer contributions for this junction will delay housing delivery, and also impact on the cash flow of developers. The transport model should therefore be stress tested to see what can be delivered in advance of the junction, and public funding options need to be investigated. (Persimmon Homes RPLP/1940). Other comment/s: 	addressed or are otherwise capable of mitigation through a well-designed development. No amendments to the plan are therefore required in respect of the objections raised. The specific issue raised by CPRE regarding the erosion of the Green Belt gap in this location is noted by the Council. The Green Belt Review shows that as a consequence of the plotlands in this area, this Green Belt gaps has already been substantially eroded, and the Council seeks through the identification of the broad locations to make effective use of eroded areas of the Green Belt in future plan reviews, providing protection to those areas of the Green Belt that make a greater contribution to the Countryside. In doing so, this presents an opportunity for a larger development as suggested by the promoter (Pigeon (Wickford) Ltd) to be considered. The Council does not support a larger allocation at this time however, for those reasons set out in the supporting text to policy SD2.

Section/Para/ Policy	Summary of Responses	Council's response
	 Notes increase in housing allocation from the 2016 plan. Notes road upgrades to support this (Rochford District Council RPLP/1661). Notes the intention to deliver a new link between the A127 and A130 at a point in the future, and is keen to continue working with Basildon Borough Council to explore this. (Rochford District Council RPLP/1661). Modification/s requested: Existing footpaths within this land allocation should be upgraded to bridleway and that the junction works proposed also make provision for a crossing over the A127 for nonmotorised users. (Essex Bridleway Association RPLP/359). 	It is noted that Persimmon Homes have raised concerns about the delivery of the junction on the A127 in terms of viability and the phasing of delivery. These concerns are noted and the Council is working with ECC to develop a phasing strategy and delivery plan to ensure this junction is delivered in a timely manner. It would however be wrong for the developer to assume that this junction will be entirely public funded, with a developer contribution mechanism needed to capture contributions from development which will be able to be delivered as a consequence of its provision.
Policy H13: Land North of Southend Road, Shotgate	 Supports: Supports proposed open space to mitigate potential impacts of odour, air and noise pollution on residential amenity from the Shotgate Water Recycling Centre, the High Voltage Transmission Lines (HVTL) and from the elevated A130 to the east. (Rochford District Council RPLP/1662). Supports proposal as long as any development is in accordance with National Grid guidelines and statutory practices. (National Grid RPLP/1682). 	The housing allocations in the Local Plan have been informed by an extensive evidence base covering sustainability appraisal, environmental matters, Green Belt and landscape impact, infrastructure impact and mitigation and considerations of deliverability. These considerations were drawn together in the Housing Options Topic Paper, and subject to a

Section/Para/ Policy	Summary of Responses	Council's response
Policy	 Support for the allocation. (Martin Grant Homes (UK) Ltd RPLP/1787). Objection: Over development of area. Proposed infrastructure is not deliverable. Other comment/s: Notes decrease in housing allocation from the 2016 plan. (Rochford District Council RPLP/1662). Evidence to indicate the deliverability of the allocation and compliance with the policy requirements provided by the site promoter. (Martin Grant Homes (UK) Ltd RPLP/1787). Anglian Water's Asset Encroachment Methodology is currently being reviewed to take account of more accurate information relating to potential odour and amenity impacts from specific WRCs in our ownership. (Anglian Water RPLP/2124). Modification/s requested: To mitigate the noise from the football club provide a buffer along the eastern boundary and consider the football club in the design of the residential area. (Sport England RPLP/839). Request that the reference to within 400m of Shotgate Recycling Centre is replaced with the cordon sanitaire identified by Anglian Water. (Martin Grant Homes (UK) Ltd 	robust and transparent decision making process. The Council is therefore satisfied that this allocation is sound, and the concerns raised have been addressed or are otherwise capable of mitigation through a well-designed development. No amendments to the plan are therefore required in respect of the objections raised. Some amendments have been sought in relation to this allocation. Firstly, Sport England seeks for a buffer to be provided along the sites eastern boundary to mitigate the noise arising from the adjacent football club. Such a buffer is however already required for noise and air quality buffering purposes along this boundary in part 3 of the policy, so the amendment sought is unnecessary. Secondly, both the site promoter and Anglian Water seek minor wording changes in respect of part 4 of the policy, which conflict. As the statutory
	RPLP/1787).	undertaker, the Council is minded to

Council's response

impact and mitigation and considerations

of deliverability. These considerations

were drawn together in the Housing

Policy		
	 Amendment to H13 as follows, Proposals must be informed by Odour Plume Modelling to the satisfaction of Anglian Water if new homes are to be located within 400m proximity of the Shotgate Wickford Water Recycling Centre where there is a risk of odour and amenity issues. (Anglian Water RPLP/2124). Requesting that the two grade II listed buildings at Shot farm are referenced. Concerns on impact of development on these buildings. (Historic England RPLP/2160). 	support the wording amendment proposed by Anglian Water, as they are most likely to use the correct terminology for the area of constraint. Thirdly, reference has been sought in respect of the Grade II listed buildings outside this site within the policy text. As a rule, where buildings are off-site this is normally referenced within the supporting text only, as it is considered policy HE3 is sufficient to cover the requirements for the protections of listed buildings and their settings. However, it is acknowledged that in this case, this reference is not included in the supporting text and therefore a modification is supported.
Policy H14: Land South of Barn Hall, Wickford	 Support: Support the relocation of sports facilities. (Sport England RPLP/821). Supports relocation of sports grounds as they are considered deliverable. (Sport England RPLP/821). 	The housing allocations in the Local Plan have been informed by an extensive evidence base covering sustainability appraisal, environmental matters, Green Belt and landscape impact, infrastructure

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• Support for allocation of H14. (Gleeson Developments/Avant

Homes RPLP/1354).

Section/Para/

Policy

Section/Para/ Policy	Summary of Responses	Council's response
	 Objection: Over development of area. Proposed infrastructure is not deliverable. Modification/s requested: Proposes further detail be given in relation to sporting management arrangements when facilities are reproved. (Sport England RPLP/821). Paragraph 3 of the policy refers to it being expected that any relocated provision will be replaced with equivalent/better facility provision. The wording should make it clear that this will be required rather than expected. (Sport England RPLP/821). The residential roads surrounding this development need to be upgraded, or 'calming' section devised. Include an area of open space at the north-eastern corner around moated site. (Historic England RPLP/2161). Seek amendment to approximate overall density of 45 duph to reflect likely variable densities across the site. (Gleeson Developments/Avant Homes RPLP/1354). Landscape buffer should be located within the adjoining open space to the west in order to make full use of the land released from the green belt. (Gleeson Developments/Avant Homes RPLP/1354). Paragraph 11.129 as drafted does not reflect the most up to date position on waste-water as set out in the IDP. Paragraph11.131 should make clear that contributions from 	Options Topic Paper, and subject to a robust and transparent decision making process. The Council is therefore satisfied that this allocation is sound, and the concerns raised have been addressed or are otherwise capable of mitigation through a well-designed development. No amendments to the plan are therefore required in respect of the objections raised. Some amendments are sought to the policy by statutory bodies. The Council agrees with the amendments sought by Sport England, as this ensures the policy is in line with the NPPF. However, it is considered that the amendment sought by Historic England is too detailed as it provides a solution in advance of knowing the impact of development on the historic asset. Policy HE3 allows for these impacts to be assessed and mitigated at the planning application stage when the design and layout of the development is known.

Section/Para/ Policy	Summary of Responses	Council's response
	each site will be proportionate to their scale. (Gleeson Developments/Avant Homes RPLP/1354).	A promoter for the site has also sought for an amendment to be made in respect of the densities to be achieve, indicating that that whilst the overall density will be achieved there may be variations of density across the site. It is recognised that this will be the case, but it is considered that to amend this policy would make it inconsistent with all other allocation policies. Furthermore, it could be reasonably interpreted that it is intended that the overall density would be 45duph, as opposed to the density at every single point within the site. Modifications have also been requested in respect of paragraph 11.129, however upon review the Council is of the view that this adequately reflects the findings of the IDP, and no amendment is necessary. The amendment sought in relation to paragraph 11.131 is meanwhile considered unnecessary as proportionate contributions are already stated in the text.

Section/Para/ Policy	Summary of Responses	Council's response
Policy H15: Land North of London Road, Wickford	 Support: Support for allocation of H15. (Persimmon Homes, RPLP/1966). There are no designated heritage assets within the site boundary. The setting of a grade II listed building to the south west of the site is not likely to be harmed by the proposed development. (Historic England RPLP/2162). Objection: Over development of area. Proposed infrastructure is not deliverable. Objection to the scale of development having a negative impact on congestion in and around London Road. Objection in relation to amenity impacts on existing properties on Castledon Road. Concerns about drainage impacts. There is no evidence to demonstrate that development on this site is contingent upon the provision of a new junction on the A127. (Redcoombe Ltd RPLP/1313). The Local Plan has been produced without an associated Housing Trajectory clarifying when various sites are expected to deliver and the delivery rates. It is unclear from the Infrastructure Delivery Plan the timescales for delivery of key infrastructure and what costs may be attributable to sites. Lack of detail within the Infrastructure Delivery Plan. (Wick 3 Nominees Ltd RPLP/1966). 	The housing allocations in the Local Plan have been informed by an extensive evidence base covering sustainability appraisal, environmental matters, Green Belt and landscape impact, infrastructure impact and mitigation and considerations of deliverability. These considerations were drawn together in the Housing Options Topic Paper, and subject to a robust and transparent decision making process. The Council is therefore satisfied that this allocation is sound, and the concerns raised have been addressed or are otherwise capable of mitigation through a well-designed development. No amendments to the plan are therefore required in respect of the objections raised. The Council notes the comments on the Infrastructure Delivery Plan, which is separate to the Local Plan. It is noted that a modification is sought to the policy requirement for around 300 homes at 35 duph. However, it is considered that this wording provides the

Section/Para/ Policy	Summary of Responses	Council's response
	 Modification/s requested: Over development of area. Proposed infrastructure is not deliverable. Delete reference to 35duph and replace with 'The site has the capacity to accommodate within the range of 300 dwellings and that the final quantum of development will be determined by a design led approach taking into account the opportunities and constraints of the site and other pertinent policies within the Plan'. (Redcoombe Ltd RPLP/1313). Objection to paragraph 9.32 as there is no evidence to demonstrate that the site cannot be delivered without new grade separated junction on the A127 at Pound Lane. (Redcoombe Ltd RPLP/1313). Reduce number of homes proposed on this site to about 1/3 current allocation. 	flexibility being sought by the consultee, so no amendment is supported in respect of this matter. There is also an objection to the requirement for sites in Wickford to be constrained by the need for a new junction on the A127. This is demonstrated by the Transport and Highway Impact Assessment which shows that without this mitigation junctions in Wickford will operate over capacity if growth occurs. The cumulative impact of growth across Wickford is therefore mitigated by this scheme, despite the scheme being a little way away from this site.
Policy H16: Land North East of Potash Road, Billericay	 Support: Potential developer for site committed to the timely delivery of housing on this site. (P & A Investments Ltd RPLP/2012). Objection: Risk of development causing congestion and/or hazardous conditions on or around Potash Road. (Billericay Action Group RPLP/1142). 	The housing allocations in the Local Plan have been informed by an extensive evidence base covering sustainability appraisal, environmental matters, Green Belt and landscape impact, infrastructure impact and mitigation and considerations of deliverability. These considerations were drawn together in the Housing Options Topic Paper, and subject to a

Section/Para/ Policy	Summary of Responses	Council's response
	 Negative impact on wildlife and/or the natural environment. (Billericay Action Group RPLP/1142, Billericay District Residents Association RPLP/1630, Essex Badger Protection Group RPLP/702, Mill Meadows Society RPLP/1407). Loss of separation between Billericay and Chelmsford. (Billericay Town Council RPLP/1921, Billericay Action Group RPLP/1142). Insufficient infrastructure improvements including education provision, healthcare and sustainable transport options. (Billericay Town Council RPLP/1921). Lack of affordable housing provision. (Billericay Action Group RPLP/1142). Negative impact on the value of neighbouring properties. Objection to the scale of development in Billericay. (Billericay Action Group RPLP/1142). Objection to the principle of development on green belt land (Stock Parish Council RPLP/1143, Norsey Wood Society RPLP/2005, Billericay District Residents Association RPLP/1630). Insufficient consideration has been given to the presence of the CLH pipeline system. Allocation of the site was based on incorrect information about land ownership and the available of access. (Billericay Action Group RPLP/1142). 	robust and transparent decision making process. The Council is therefore satisfied that this allocation is sound, and the concerns raised have been addressed or are otherwise capable of mitigation through a well-designed development. No amendments to the plan are therefore required in respect of the objections raised. In relation to the representation claiming that Stock Parish Council were not consulted, the Council can confirm that they were consulted on both the Draft Local Plan and the Revised Publication Local Plan in accordance with the regulations. The Council does however agree that it may be necessary to make some technical changes to policy H16 to ensure the deliverability of the policy. Firstly, the matter of the CLH Pipeline have been raised. The Council is confident at a scheme can be designed which limits development upon to the pipeline (just crossing points) and

Section/Para/ Policy	Summary of Responses	Council's response
	 Access issues mean more land may be de-allocated from the Green Belt in future to address those issues. (Billericay Action Group RPLP/1142). Inclusion of the site is not consistent with the Local Plan evidence base. (Billericay Action Group RPLP/1142). Site was not allocated at Reg 18 stage and without engagement with Stock Parish Council. (Stock Parish Council RPLP/1143). Site is not sustainable in respect of highways, education, health, drainage and other social and physical infrastructure. (Stock Parish Council RPLP/1143). Proposed density is not in scale with current dwellings in the area. Sites are identified in the HELAA as not achievable. (Billericay Town Council RPLP/1921). Negative impact on Ancient Woodland and designated wildlife site. (Billericay Town Council RPLP/1921, Billericay Action Group RPLP/1142). No provision has been made for additional senior school education. Land at Linda Gardens is more suitable for allocation than this site. (Millwood Designer Homes Ltd RPLP/1821). Surface water flooding affects this site and there is insufficient capacity in the Water Recycling Centres nearby. (Billericay District Residents Association RPLP/1630). 	ensures ongoing access for maintenance. However, it is agreed that some minor amendments should be made to this policy for the purpose of clarity stating that the design and layout of development must take into account the existing fuel pipelines in close proximity to which traverse the site. Consideration will be given to the requirements of CLH Pipeline System, in order to ensure safe working in close proximity to buried CLH-PS pipelines. Secondly, P and A Investments Ltd, a promoter of land in this location has suggested a series of amendments to this policy. It is agreed that a minor wording change to provide clarity as to how access will be secured for this site is necessary. However, the Council does not agree with any of the other amendments proposed, having cross checked with its evidence base, and also to ensure that the necessary infrastructure is provided.

Section/Para/ Policy	Summary of Responses	Council's response
	 Concern about visibility splays in relation to access/egress for this site. (Billericay District Residents Association RPLP/1630, Billericay Action Group RPLP/1142). 	
	Other comment/s: • Evidence to support the allocation, and how the policy requirements can be addressed provided by the potential developer. (P & A Investments Ltd RPLP/2012).	
	 Modification/s requested: Remove all Green Belt development from the Plan. Build on brownfield sites only and reduce the number of proposed houses accordingly. Potash Road needs to be widened and/or traffic calming measure or restrictions need to be introduced. Remove this site allocation on ground of insufficient infrastructure improvements. 	
	 Redevelop areas that are already run down and relocate people to areas where houses are vacant across the whole of England instead of building in the south east. Reduce the number of homes proposed. Remove the site from the plan due to wildlife impacts. (Essex Badger Protection Group RPLP/702). The location should be allocated for increased sporting 	

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Section/Para/ Policy	Summary of Responses	Council's response
	 Policy should be prescriptive in with regard to ecological assessment methodology. (Mill Meadows Society RPLP/1407). This policy should set out the housing mix and level of affordable housing. (Billericay District Residents Association RPLP/1630). Policy should set out why this site was selected for release from the Green Belt. (Billericay District Residents Association, RPLP/1630). Further details regarding the pipeline and associated easements are required. (Billericay District Residents Association RPLP/1630). The information regarding infrastructure, including highways, community facilities and services as well as surface water drainage, waste water treatment capacity and ecology need to be assessed in more detail. (Billericay District Residents Association RPLP/1630). Site is 10ha not 11 ha therefore proposal to reduce requirement for open space and increase density. (P and A Investments Ltd RPLP/2012). The policy wording should be amended to remove reference to "utilising existing access points". Whilst there are access points associated with existing dwellings within the allocation (no's 41 and 65), the proposed access within the curtilage of no.41 requires the removal of the existing dwelling. Therefore, the existing access track to land to the rear of no.41 is not 	

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	 sufficient on its own to provide the necessary vehicle access to the site. (P and A Investments Ltd RPLP/2012). It should not be an absolute requirement that landscape buffers are provided to boundaries of the site as this may not be appropriate for the site layout. (P and A Investments Ltd RPLP/2012). Remove reference to "in close proximity to the site". As the pipeline traverses the site, the wording is not justified. (P and A Investments Ltd, RPLP/2012). Remove reference to "and does not exceed the capacity of existing infrastructure". This wording is not justified as any impact on existing infrastructure as a result of the development will be appropriately mitigated through either CIL payments, Section 106 planning obligations or a combination of both. (P and A Investments Ltd RPLP/2012). Point 6 should be removed as it is not justified. (P and A Investments Ltd RPLP/2012). Green infrastructure provision should be considered looking not just within the site but also in relation to the wider corridor to the north of Potash Road. (Mill Meadows Society RPLP/1407). 	
Policy H17: South West Billericay	 Support: Allocation supported in principle by land promoters. (Redrow Homes Ltd RPLP/2217, Gleeson Developments Ltd RPLP/1846, Scott Properties & McCarthy and Stone RPLP/2259, Taylor Wimpey RPLP/1908). 	The housing allocations in the Local Plan have been informed by an extensive evidence base covering sustainability appraisal, environmental matters, Green Belt and landscape impact, infrastructure

Section/Para/ Policy	Summary of Responses	Council's response
	 Developers are committed to early delivery. (Redrow Homes Ltd RPLP/2217, Gleeson Developments Ltd RPLP/1846). Developers are committed to delivery of site access and the junction on the A129. (Redrow Homes Ltd RPLP/2217). No objection is made to the principle of this policy as provision is made in the policy and reasoned justification for relocating Billericay Cricket Club and Billericay Lawn Tennis Club that are affected by the proposed development of area H17b. (Sport England RPLP/841). Supports the need for the relief road. (Taylor Wimpey RPLP/1908). Supports the need for a development framework for the whole site against which applications can be submitted against. 	impact and mitigation and considerations of deliverability. These considerations were drawn together in the Housing Options Topic Paper, and subject to a robust and transparent decision making process. The Council is therefore satisfied that this allocation is sound, and the concerns raised have been addressed or are otherwise capable of mitigation through a well-designed development. No amendments to the plan are therefore required in respect of the objections raised.
	 (Taylor Wimpey RPLP/1908). Objection: Site H17d is considered completely unsuitable for development due to the presence of Badgers. (Essex Badger Protection Group RPLP/702). Proximity of development to Frith Wood will harm biodiversity. A larger buffer is required (Mill Meadow Society RPLP/1411, Billericay Action Group RPLP/1144). Objection to relocation of sporting facilities. (Billericay Action Group RPLP/1144). 	Objections have also been raised in respect of the effectiveness of the relief road. The Transport and Highway Impact Assessment report demonstrates that it will be effective. The routing does however require the demolition of the farmhouse at Kingsman Farm. This belongs to the current owners of site H17c. Objections have also been raised in respect of the loss of the sports facilities in this location. It is not intended that

Section/Para/ Policy	Summary of Responses	Council's response
	 Objection to the principle and/or scale of loss of Green Belt (Norsey Wood Society RPLP/2006, Little Burstead Parish Council RPLP/3165). Allocation is not consistent with the recommendations of the Green Belt Review. (Billericay Action Group RPLP/1144). The allocation would have a negative impact on wildlife and/or the natural environment. (Little Burstead Parish Council RPLP/3165, Billericay Action Group RPLP/1144). Objection to loss of open space. (Billericay Action Group RPLP/1144). Insufficient infrastructure improvements including education provision, healthcare and/or sustainable transport. (Billericay Town Council RPLP/1915). Proposed relief road is not demonstrated to be effective as some junctions will still be over capacity. (Billericay Town Council RPLP/1915, Little Burstead Parish Council RPLP/3165). Homes will not be affordable to local residents. Objection to loss of sporting facilities. (CPREssex RPLP/1878). Potential negative impact on archeologically sites. Retain public green space. Objection to the scale of development in Billericay. Adverse effect on property prices. Risk of flooding in and around Frithwood Lane. (Billericay Action Group RPLP/1144). 	they are lost, it is clear in policy H17 that they are replaced and this is recognised by sport England in their representation. A series of modifications are sought to this policy. Firstly, there is an expectation that Frith Wood to the south of site H17d should be identified as an ancient woodland on the policies map. Ancient woodland are a national designation outside the planning regime. The decision has therefore been taken to exclude these from the policies map, as these are not dictated by the Local Plan, and can change as a consequence of the actions of others. It should however be noted that it is protected as a Local Wildlife Site. Secondly, an up to date masterplan is required. This is a requirement of the policy, and no amendment is therefore needed. Thirdly, it is suggested that this site should make provision for a new railway

Section/Para/ Policy	Summary of Responses	Council's response
	 The Site was not identified as preferred options in Reg 18 consultation. Objection on the grounds of increased traffic pollution. Loss of separation between Billericay and Hutton. Objection to the timescale of proposed development. (Billericay Action Group RPLP/1144). Negative impact on and around Mountnessing Road. (Billericay Action Group RPLP/1144). Negative impact on and around Tye Common Road. (Billericay Action Group RPLP/1144). Loss of separation between Billericay and Little Burstead. (Little Burstead Parish Council RPLP/3165). Council have disregarded their own report findings and plan to overdevelop H17a and remove green belt. (Billericay District Residents Association RPLP/1631, Billericay Town Council RPLP/1919). Objection to locating sports facilities on agricultural land. Negative impact on long distance views. (CPREssex RPLP/1878, Little Burstead Parish Council RPLP/3165, Billericay Action Group RPLP/1144). Loss of agricultural land. (CPREssex RPLP/1878). The development will place additional pressure on A127 and A13. No provision has been made for additional senior school education. 	bridge. There is no evidence to support such a requirement. Fourthly, a number of consultees suggest an alternative strategy based on a new town. This would fundamentally depart from the Spatial Strategy of the plan, as set out in chapter 6, and has been used to develop the Local Plan since consultation on spatial options in the Core Strategy Revised Preferred Options. This amendment is not therefore supported by the Council. It is suggested that a multi-user link should be provided alongside the new road. Whilst the Council supports sustainable travel modes, such a route which skirts the edge of the town may not provide the connectivity needed for those seeking to travel by active means. Paragraph 1.155 addresses the Council's expectations in relation to active travel. It is however agreed that increased reference could be made to public transport modes in respect of this policy and a modification to this effect

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Section/Para/ Policy	Summary of Responses	Council's response
•	of a club house on the Green Belt. (Billericay District Residents Association RPLP/1631). Policy should be more robustly worded in terms of the infrastructure and environmental protection requirements. (Billericay Town Council RPLP/1915). Queries degree of consultation undertaken with affected sports clubs. (Billericay Town Council RPLP/1915, Billericay Action Group RPLP/1144). Questions suitability of a new access onto Mountnessing Road from site H17a. (Billericay Town Council RPLP/1915, Billericay Action Group RPLP/1144).	proposed by ECC is agreeable to the Council. Sport England seek modifications to ensure that the sport pitch re- provision is appropriate and the impacts on residential amenity given the proximity to Billericay Town FC are considered. It is agreed such modifications should be made to ensure the sustainability of sports provision. Modifications have been sought in respect of Frith Wood, however there is no evidence to support these modifications. At this time the woodland is not open for recreational access, and the policy requires it to be brought into active management which would address such impacts if it were to be opened up. Historic England have also sought modifications to this policy, however the Council is of the view that the evidence does not support these modifications. Policy in chapter 17 allow for any

Section/Para/ Policy	Summary of Responses	Council's response
	 Concerned about the impacts of growth on car parking capacity in Billericay Town Centre. (Billericay Town Council RPLP/1915). Object to the policy requirement which suggests site H17a is reliant on the relief road. (Redrow Homes Ltd RPLP/2217). Object to the policy requirement requiring the retention of all tree belts and hedgerow, as some amendments will be needed for development to occur especially to deliver number of homes required. (Redrow Homes Ltd RPLP/2217). Object to specification provided in policy regarding relocation site for cricket club. (Redrow Homes Ltd RPLP/2217). Object to wording in relation to primary school, as this does not allow for capacity within existing schools to be utilised first. (Redrow Homes Ltd RPLP/2217). Object to the policy implication that entire site is responsible for ongoing management of Frith Wood. This is not directly related to site H17a. (Redrow Homes Ltd RPLP/2217). Object to the policy implication that entire site is responsible for improvements to Frithwood Lane. This is not directly related to site H17a. (Redrow Homes Ltd RPLP/2217) Object to housing quantum, this should be expressed as a minimum to provide flexibility. (Gleesons Development Ltd RPLP/1846). Object to the level of specificity with regard to the routing of the relief road to allow other options within the broader allocation 	incidental historic assets in this location to be dealt with at the time of application. A series of modifications are also proposed in relation to this policy by the site promoters and landowners. The Council has based this policy on the SW Billericay High Level Development Framework, and is satisfied that the policy is sound, as it is justified by evidence. The viability testing has demonstrated it is deliverable, albeit cost of the infrastructure provision will need to be shared across all four components of this allocation. The Council is of the view that the national housebuilding companies involved have the capacity to achieve this if they coordinate their efforts. The Council is not therefore minded to significantly amend this policy, although the following minor modifications are agreed as necessary: • It is appropriate to amend the supporting text to make clear that each land parcel will be expected to deliver its part of the road.

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Section/Para/ Policy	Summary of Responses	Council's response
	 to be explored. (Gleesons Development Ltd RPLP/1846, Taylor Wimpey RPLP/1908). Clarity and flexibility is sought in relation to infrastructure provision to enable early delivery. (Gleesons Development Ltd RPLP/1846). Lack of meaningful consultation given change to scale of development in this location. (Little Burstead Parish Council RPLP/3165). Other comment/s: Development as part of this allocation must be informed by an up to date Masterplan. (Scott Properties and McCarthy & Stone RPLP/2259). The Local Plan should identify Frith Wood as ancient woodland. Phase 1 ecology survey required. (Billericay District Residents Association RPLP/1631). Masterplanning process needs to be clarified. (Redrow Homes Ltd RPLP/2217). Evidence to support the allocation, and how the policy requirements can be addressed provided by the land promoter of H17d. (Gleesons Development Ltd RPLP/1846). The masterplan should enable the development to come forward in phases. (Gleesons Development Ltd RPLP/1846). 	 It is appropriate to amend the supporting text to make clear that hedgerows and tree belts will be retained and enhanced where practical. It would improve the clarity of the plan to modify part 2 to including phasing, and identify infrastructure as a strategic issue to be addressed through the masterplanned approach. It would be appropriate for the requirement for a masterplan to be approved by the LPA, as this approach will help to ensure the policy is delivered in a coordinated manner (Taylor Wimpey RPLP/1908) Amendment of grammatical error in supporting text as identified by Scott Properties and McCarthy and Stone. It is noted that the promoters in this location have not been able to satisfy the Cricket Club with a suitable alternative

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Section/Para/ Policy	Summary of Responses	Council's response
	 Site shown for Cricket Club relocation is not now suitable as only leasehold was offered. (Billericay Cricket Club RPLP/3621). Billericay Cricket Club hosts professional cricket of county and international standard. (Billericay Cricket Club RPLP/3621). Surface water management is important for cricket grounds and the policy requirement should be extended to the relocation site. (Billericay Cricket Club RPLP/3621). Requirement to re-provide cricket provision should be firmed up, although some flexibility over the re-location site is required. (Billericay Cricket Club RPLP/3621). 	site. The Council will be looking to the developers to be able to resolve this issue if they wish to bring development forward on the existing cricket ground. All of the land promoters in this location have further land that sits outside the identified development area.
	 Modification/s requested: Remove the Relief Road. (Mill Meadow Society RPLP/1411). Replace relief road with a bypass. Remove this housing allocation from the Local Plan. (Billericay Action Group RPLP/1144). Need to replace/widen Railway Bridge. It would be preferable to develop one large settlement in the Green Belt than H16-H20. A new town should be developed. (Little Burstead Parish Council RPLP/3165). The Policy should provide multi-user links throughout the development, together with a multi-user route parallel to the new relief road. (Essex Bridleway Association RPLP/364). 	

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Section/Para/ Policy	Summary of Responses	Council's response
	 Improved footpath provision is required on or around Firthwood Lane Should incorporate mitigation measures in the form of sustainable transport including public transport. (ECC RPLP/1775). Should reference Historic Environment record in supporting text at paragraph 17.47. (ECC RPLP/1810 and RPLP/1811). The management arrangements for the relocated cricket and tennis club facilities must be at least equivalent to the existing arrangements in relation to matters such as security of tenure, maintenance costs, management charges and community accessibility. (Sport England RPLP/841). The relocated cricket and tennis club facilities will need to meet current Sport England and sport's governing body design guidance, health & safety regulations and building regulations which may result in relocated facilities having to be slightly larger or of a higher specification than the facilities that they will replace. It should also recognise that the clubs may need to provide indoor facilities or larger ancillary facilities on their relocated sites to meet the current/future needs of the community and ensure their long term sustainability. (Sport England RPLP/841). Development should be planned to minimise residential amenity impact .associated with the operation of Billericay Town FC's facilities. (Sport England RPLP/841). 	

Section/Para/ Policy	Summary of Responses	Council's response
	 Policy should require new fully funded facilities to address the requirements of drainage, both surface water and foul, and the respective upgrades to the various utilities. Require homes not to be built within 200 MT of Frith Wood. Enable Frithwood Lane residents to move into new homes without cost. Insufficient detail is provided in policy in regards to size and type of housing, timing of infrastructure and locations of sporting facilities and open space provision. (Billericay District Residents Association RPLP/1631). Increased recreational use of Frith Wood requires a robust mitigation plan. (Essex Wildlife Trust RPLP/1835). The relocation should be capable of implementation ahead of the development of areas outside of Policy H17b The new facility will require at least 8 acres an enlarged sports pavilion and the provision of permanent indoor sports facilities comprising at least four tennis courts and extensive floodlighting. The new educational facility should not be sited on the current Tennis Club ground. H17b should identify that some of the 290 homes will provide for retirement living. (Biminster Homes RPLP/2089). Policy and supporting text should refer to an area of archaeological potential in site H17b. (Historic England RPLP/2163). 	

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Section/Para/ Policy	Summary of Responses	Council's response
	 Policy and supporting text should require development in H17d to preserve or enhance the neighbouring conservation area. (Historic England RPLP/2163). Change deliver around 1, 700 new homes to a minimum of 1,700. (Scott Properties and McCarthy & Stone RPLP/2259). Revise supporting text to identify relief road as an important element to the realisation of the proposed level of development and to clarify that. Alternative highway options tests do not provide capacity for the proposed levels of growth. (Scott Properties and McCarthy & Stone RPLP/2259). Identify that the relief road will begin at junction of London Road. (Scott Properties and McCarthy & Stone RPLP/2259). Correction of grammatical error in supporting text. (Scott Properties and McCarthy & Stone, RPLP/2259). Revise supporting text to refer to H18e. (Scott Properties and McCarthy & Stone RPLP/2259). Allow flexibility in respect to the relocation of cricket and tennis clubs. (Scott Properties and McCarthy & Stone RPLP/2259). Amend to allow new primary school and early year's provision to be directed to most appropriate sites within H17 and revise supporting text to clarify that it serves the long-term needs generated by the development. (Scott Properties and McCarthy & Stone RPLP/2259, Taylor Wimpey RPLP/1908). Revise text to include secondary points of access from Blunts Wall Road and London Road and to clarify that access to H17c 	

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	 would be secured via H17b. (Scott Properties and McCarthy & Stone RPLP/2259). Revised text include to expand and utilise capacity of the existing schools in the area and deliver on-site provision at the appropriate phase of the development. (Scott Properties and McCarthy & Stone RPLP/2259). Add to policy 'the provision of employment generating uses including local retail provision will be viewed favourably, providing they support the sustainability of the local area and do not detract from the quality of place,'. (Scott Properties and McCarthy & Stone RPLP/2259). Add to policy 'The proposed allocations should be viewed as indicative and the Master planning process will ensure that the capacity of the land is maximised to deliver. (Scott Properties and McCarthy & Stone RPLP/2259). Additional development where it can be accommodated without material adverse impacts on landscape, character, highways or infrastructure delivery.' (Scott Properties and McCarthy & Stone RPLP/2259). Revised landscape buffer to include educational provision and health facilities. (Scott Properties and McCarthy & Stone RPLP/2259). Include the potential for new bus route in 11.155. (ECC RPLP/1774). 	

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Section/Para/ Policy	Summary of Responses	Council's response
	 Increase allocation area for the Tennis Club to allow expansion. (Scott Properties and McCarthy & Stone RPLP/2260). Proposal to identify H17a for retail use with housing relocated to existing retail areas Development should retain current sporting provision and be delivered as low rise flats. H17a to d allocations in south-west Billericay are referred to in the evidence base as H18a to d. (Billericay District Residents Association RPLP/4963). Access to site H17a has not been the subject of any Assessment or mitigation exercises. Two parcels of land are not being promoted as part of the proposed Policy H17b. Accordingly, this land is not considered 'available' for development and should not comprise part of the allocation. (Scott Properties and McCarthy & Stone RPLP/2261). Fails to meet housing need in policy SD1. No clear statement about position in relation to five year land supply. Policy should be more robustly worded in terms of the infrastructure and environmental protection requirements. (Billericay Town Council RPLP/1915, Billericay Action Group RPLP/1144). Consult with Tennis Club and Cricket Club. (Billericay Town Council RPLP/1915). 	

Section/Para/ Policy	Summary of Responses	Council's response
	 Produce transport modelling of the junction to be provided on London Road to access site H17a - generally redo transport modelling. (Billericay Town Council RPLP/1915). Consult with the HNS and CCG requiring GP provision for this site – provide a GP hub. (Billericay Town Council RPLP/1915). Provide more details on how each development area will contribute toward relief road. (Billericay Town Council RPLP/1915). Extend cycle action plan into this allocation and demonstrate how these will relieve congestion. (Billericay Town Council RPLP/1915). Produce a parking action plan for Billericay. (Billericay Town Council RPLP/1915). Work with Greater Anglia to improve rail capacity. (Billericay Town Council RPLP/1915). Reduce allocation to reflect Green Belt Review and Landscape Appraisals. (Billericay Town Council RPLP/19144). Create a strategic open space or nature reserve at H17d and specify how the ancient woodland will be managed. (Billericay Town Council RPLP/1919, Billericay Action Group RPLP/1144). Provide a larger buffer to the ancient woodland. (Billericay Town Council RPLP/1919, Billericay Action Group RPLP/1144). 	

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	 Test effectiveness of the relief road and demonstrate benefits outweigh harm to the green Belt. (Billericay Town Council RPLP/1915). Potential presence of Roman road should be referenced in policy and supporting text. (Historic England RPLP/2163). Location adjacent to Billericay conservation area should be reference in policy and supporting text. (Historic England RPLP/2163). Amendment to policy requirement regarding the relief road, to make each land parcel deliver its specific element. (Redrow Homes Ltd RPLP/2217). Amend the policy requirement requiring the retention of all tree belts and hedgerow, as some amendments will be needed for development to occur especially to deliver number of homes required. (Redrow Homes Ltd RPLP/2217). Amend level of specification provided in policy regarding relocation site for cricket club. (Redrow Homes Ltd RPLP/2217). Amend wording in relation to primary school, as this does not allow for capacity within existing schools to be utilised first. (Redrow Homes Ltd RPLP/2217). Amend policy implication that entire site is responsible for ongoing management of Frith Wood. This is not directly related to site H17a. (Redrow Homes Ltd RPLP/2217). 	

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	 Requirement to re-provide cricket provision should be firmed up, although some flexibility over the re-location site is required. (Billericay Cricket Club RPLP/3621). Extend surface water management requirements to cover cricket ground also. (Billericay Cricket Club RPLP/3621). Replace requirement for a masterplan with a requirement for a Development framework. (Taylor Wimpey RPLP/1908). Remove reference to ancient woodland in part 9. (Taylor Wimpey RPLP/1908). 	
Policy H18: Land South of Windmill Heights, Billericay	 Support: Welcome statements with regard to conserving hedgerows, trees and instating landscape buffers, as this site is important in linking Mill Meadows to Laindon Common. (Mill Meadows Society RPLP/1413, Billericay Action Group RPLP/1145). Point 4 of the policy welcomed. (Historic England RPLP/2164). Land promoter welcomes allocation and suggests this allocation is available now and can contribute towards five year housing land supply. (Gleeson Developments Ltd RPLP/1844). Objection: Insufficient infrastructure improvements proposed including sustainable transport, education and/or healthcare provision. This allocation should also be dependent on the Relief Road provision, as it is close to the area of High Street where congestion occurs. (Billericay Action Group RPLP/1145). 	The housing allocations in the Local Plan have been informed by an extensive evidence base covering sustainability appraisal, environmental matters, Green Belt and landscape impact, infrastructure impact and mitigation and considerations of deliverability. These considerations were drawn together in the Housing Options Topic Paper, and subject to a robust and transparent decision making process. The Council is therefore satisfied that this allocation is sound, and the concerns raised have been addressed or are otherwise capable of mitigation through a well-designed development. No amendments to the

Section/Para/ Policy	Summary of Responses	Council's response
	 Negative impact on roads surrounding land south of Windmill Heights, in particular Kennel Lane which is not considered suitable to provide site access in its current form. (GBSG Village Council RPLP/1917, Billericay Action Group RPLP/1145). Overdevelopment. (Billericay Action Group RPLP/1145). Loss of greenbelt. (GBSG Village Council RPLP/1917, Billericay Action Group RPLP/1145). Wil cause ancient settlements to merge. (GBSG Village Council RPLP/1917). Lack of affordable homes. Insufficient infrastructure improvements including education provision, healthcare and/or sustainable transport. (GBSG Village Council RPLP/1917). Flood risk. (Billericay Action Group RPLP/1145). Negative impact on biodiversity. (GBSG Village Council RPLP/1917). Negative impact on levels of sewage and domestic water supply. (GBSG Village Council RPLP/1917). Proposed relief road is not demonstrated to be effective. (Billericay Action Group RPLP/1145). Topography of the field is such that its development would have adverse impact to virtually any view. Inconsistent with the HRA. (GBSG Village Council RPLP/1917). 	plan are therefore required in respect of the objections raised. Modifications are sought to the policy by the Billericay District Residents Association seeking more details to be included. The Council is of the view that the details sought are not appropriate for inclusion in the Local Plan, but will be addressed at the planning application stage, as required by the relevant policies within the plan, which should be read as a whole. ECC have sought an amendment in relation to early years and childcare provision. For the purposes of accuracy, the Council supports this amendment. The land promoter seeks flexibility with regard to the number and density quoted in the policy. The Council believes the policy is sufficiently flexible in relation to these matters already, and does not agree with these amendments at this time.

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	 Lack of consultation. Other comment/s: Enable non internet users to respond to Plan. Conservation areas nearby should be referenced in the supporting text. (Historic England RPLP/2164). Evidence to support the allocation, and how the policy requirements can be addressed provided by the land promoter. (Gleesons Development Ltd RPLP/1844). Modification/s requested: Correct reference to early years and childcare. (ECC RPLP/1812). More details on the landscape buffering is required. (Billericay District Residents Association RPLP/1636). The information regarding infrastructure, including highways, community facilities and services as well as surface water drainage, waste water treatment capacity and ecology need to be assessed in more detail and not deferred for later approval. (Billericay District Residents Association RPLP/1636). Requirement for trial trenching should be added to point 4. (Billericay District Residents Association RPLP/1636). The issue of flood risk and surface water drainage needs to be assessed prior to the allocation of the site. (Billericay District Residents Association RPLP/1636). 	The site, Land at Linda Gardens is proposed for around 30 homes. It is not therefore considered a reasonable alternative to this allocation for 400 homes, as is of a completely different scale. The site Land at Linda Gardens has been considered on its own merits and has been omitted from the Local Plan for the reasons set out in the Housing Options Topic Paper.

Section/Para/ Policy	Summary of Responses	Council's response
	 Overdevelopment in SE Billericay so increase development in West Billericay. (Millwood designer Homes Ltd RPLP/1822). Land north of Linda Gardens to be allocated for 30 dwellings as an alternative. (Millwood designer Homes Ltd RPLP/1822). Express 200 homes as a minimum and 35 duph as an approximate requirement within the policy to improve flexibility. (Gleesons Developments Ltd RPLP/1844). 	
Policy H19: Land East of Greens Farm Lane, Billericay	 Support: Support extending the existing Mill Meadows Nature reserve. (Billericay District Residents Association RPLP/1637). Support of H19. (RPLP/2253 Commercial Estates Group). The majority of the site is within the control of the land promoter and is considered deliverable – early delivery is preferred. (RPLP/2253 Commercial Estates group). Objection: Specific objection to the southern part of this allocation. (GBSG Village Council RPLP/1913). Current wording of point 4 is not justified. (RPLP/2253 Commercial Estates Group). Development capacity has not been supported by Green Belt Landscape capacity study and Outline Landscape Appraisal. (Millwood designer Homes Ltd RPLP/1824). Negative impact on roads – emphasis on junctions of Greens Farm Land and Outwood Common Road, and Outwood 	The Local Plan evidence base supports the allocation of this site. The housing allocations in the Local Plan have been informed by an extensive evidence base covering sustainability appraisal, environmental matters, Green Belt and landscape impact, infrastructure impact and mitigation and considerations of deliverability. These considerations were drawn together in the Housing Options Topic Paper, and subject to a robust and transparent decision making process. The Council is therefore satisfied that this allocation is sound, and the concerns raised have been addressed or are otherwise capable of mitigation through a well-designed development. No amendments to the plan are

Section/Para/ Policy	Summary of Responses	Council's response
	 Common Road and Southend Road. (GBSG Village Council RPLP/1913, Billericay Action Group RPLP/1146). Growth combined with existing parking issues will increase congestion on surrounding roads. (Billericay Action Group RPLP/1146). Car parking at local shops is insufficient to accommodate growth. (GBSG Village Council RPLP/1913, Billericay Action Group RPLP/1146). Overdevelopment. (GBSG Village Council RPLP/1913, Billericay Action Group RPLP/1146. Loss of greenbelt. (GBSG Village Council RPLP/1913, Norsey Wood Society RPLP/2008). Capacity of schools to accommodate growth limited. (GBSG Village Council RPLP/1913, Billericay Action Group RPLP/1146). Capacity of Health infrastructure to accommodate growth. (GBSG Village Council RPLP/1913). Landscape impacts. (Billericay Action Group RPLP/1146). Lack of affordable home. Insufficient infrastructure improvements including education provision, healthcare and/or sustainable transport. Flood risk. (Billericay Action Group RPLP/1146). Negative impact on biodiversity – Mill Meadow in particular is a SSSI, and hedgerows on site. (GBSG Village Council RPLP/1913, Cllr Schrader RPLP/2065). 	therefore required in respect of the objections raised. In relation to the modification sought requiring a Phase 1 Habitat Survey, this is a matter for the planning application stage, with the work undertaken for the Local Plan providing a basis for the main issues to be considered. Any such requirement is however already set out under policy NE4 and no modification to this policy is therefore required. Part 2 of the policy has been reviewed in respect of the access arrangements. It is considered that the correct road names are stated, as has been agreed with the Highway Authority. It is noted that the promoters seek amendments to parts 3, 4 and 5 of this policy. The Council supports the amendment to part 3, as this makes clear the Council's intention for this to be a publicly accessible space. The Council will work with the promoter further in relation to the amendments sought in

Section/Para/ Policy	Summary of Responses	Council's response
	 Benefits of public open space provision within this site for biodiversity questioned. A proper Habitat Regulation Assessment is required. This policy is inconsistent with its findings. (GBSG Village Council RPLP/1913). Negative impact on air quality. Development will cause noise impacting on amenity of elderly residents in South Green. Negative impact on levels of sewage and domestic water supply. (Billericay Action Group RPLP/1146). Lack of consultation. Negative impact on Grade II listed Sames Cottage. (Millwood Designer Homes Ltd RPLP/1823). Other comment/s: Enable non internet users to respond to Plan. Conservation areas nearby should be referenced in the supporting text. (Historic England RPLP/2164). A proportion of the publicly accessible open space within the site is needed to support the housing development due to the number of homes allocated within the plan. (Commercial Estates Group RPLP/2253). 6.5ha of the allocated open space within the site is not directly needed by this development to make it acceptable. This will serve the wider Billericay area and an approach needs to be 	relation to points 4 and 5, as the implications of these need to be understood in more detail before the Council can agree them. The site, Land at Linda Gardens is proposed for around 30 homes. It is not therefore considered a reasonable alternative to this allocation for 400 homes, as is of a completely different scale. The site Land at Linda Gardens has been considered on its own merits and has been omitted from the Local Plan for the reasons set out in the Housing Options Topic Paper.

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	 agreed with the Council to secure it. (Commercial Estates Group RPLP/2253). Points 1 and 3 and paragraphs 11.167 and 11.168 2.4.3 Paragraphs 11.167, 11.168 and points 1, 3, 5 and 6 of Policy H19 contradict each other and are at odds with CEG assessments. (Commercial Estates Group RPLP/2253). Some of the landscape corridors between the fields are not required to provide a landscape buffer and their retention will affect the ability to secure the number of homes sought. (Commercial Estates Group RPLP/2253). Development should be delivered via a new village. (Great Burstead & South Green Village Council RPLP/1913). 	
	 Modification/s requested: Amend point 3 of the policy to make clear that the area of open space will be publicly accessible formal and informal open space to offset recreational impacts on Mill Meadow, rather than an extension to the nature reserve. (Commercial Estates Group RPLP/2253). Amend point 4 of the policy to provide flexibility around the long term management and maintenance of the open space, taking into account that 6.5ha is not required to address the direct impacts arising from this development. (Commercial Estates Group RPLP/2253). 	

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	 Amend point 5 of the policy to reflect the detailed landscape evidence provided by the promoter regarding hedge and tree rows within the site. (Commercial Estates Group RPLP/2253). Improvements to infrastructure required. (Roads, education, Health, drainage, Billericay Action Group RPLP/1146). More detail required in respect of infrastructure requirements, including drainage. (Billericay District Residents Association RPLP/1637). Reduce number of homes. (Billericay Action Group RPLP/1146). No housing on this site. Reduce development in the Green Belt. Overdevelopment in SE Billericay so increase development in West Billericay. (Millwood designer Homes Ltd RPLP/1823). Land north of Linda Gardens to be allocated for 30 dwellings as an alternative. (Millwood designer Homes Ltd RPLP/1823). Use the land between the allocations for a park/leisure facility, as it will not establish quickly as a nature reserve. Build a new town elsewhere. Phase 1 Habitat Survey required. (Billericay District Residents Association RPLP/1637). Access arrangements not correct. (Billericay District Residents Association RPLP/1637). 	
Policy H20: Land East of Southend Road, Billericay	Support:	The housing allocations in the Local Plan have been informed by an extensive evidence base covering sustainability

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	 The principle of the allocation is supported by the site promoter. (BDW Eastern Counties RPLP/2187). Objection: Negative impact on roads. Overdevelopment. Loss of greenbelt. Lack of affordable homes. Insufficient infrastructure improvements including education provision, healthcare and/or sustainable transport. (Billericay Action Group RPLP/1147, Billericay District Residents Association RPLP/1638, GBSG Village Council RPLP/1914). Flood risk. (Billericay Action Group RPLP/1147, Billericay District Residents Association RPLP/1638). Negative impact on biodiversity. (Mill Meadows Society RPLP/1414, GBSG Village Council RPLP/1914, Billericay Action Group RPLP/1147). Negative impact on congestion and air quality. (Billericay Action Group RPLP/1147, Billericay District Residents Association RPLP/4963, GBSG Village Council RPLP/1914). Car parking at local shops is insufficient to accommodate growth. (Billericay Action Group RPLP/1147, GBSG Village Council RPLP/1914). Negative impact on levels of sewage, drainage and domestic water supply. (Billericay Action Group RPLP/1147, Billericay 	appraisal, environmental matters, Green Belt and landscape impact, infrastructure impact and mitigation and considerations of deliverability. These considerations were drawn together in the Housing Options Topic Paper, and subject to a robust and transparent decision making process. The Council is therefore satisfied that this allocation is sound, and the concerns raised have been addressed or are otherwise capable of mitigation through a well-designed development. No amendments to the plan are therefore required in respect of the objections raised. It is noted that the promoter for this site seeks some flexibility in terms of the number of homes to be delivered. The Council is seeking to optimise the use of land through the Local Plan and would not support a range which dips below the number indicated in this policy. There is a comment on consultation in relation to this policy. The consultation for the Local Plan has exceeded the

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	 District Residents Association RPLP/1638, GBSG Village Council RPLP/1914). Proposed relief road is not demonstrated to be effective. (Billericay Action Group RPLP/1147). Topography of the field is such that its development would have adverse impact on view. Lack of consultation. Overdevelopment in SE Billericay so increase development in West Billericay. (Millwood designer Homes Ltd RPLP/1823). Objection to development in the Green Belt. (Norsey Wood Society RPLP/2009, GBSG Village Council RPLP/1914). A proper Habitat Regulation Assessment is required. This policy is inconsistent with its findings. (GBSG Village Council RPLP/1914). 	requirements of the regulations and achieved a high level of engagement. It is not considered that further consultation is therefore required at this time.
	 Other comment/s: Enable non internet users to respond to Plan. Evidence of site deliverability and the potential to be compliant with policy requirements provided by site promoter. (BDW Eastern Counties RPLP/2187). Modification/s requested: Reduction of housing numbers. (Billericay Action Group RPLP/1147). Withdraw plan. 	

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	 Withdraw contentious sites. Revise plan to mitigate saturation of NHS services. Flexibility in the wording of the Policy to allow for a suggested range of dwelling numbers of 180-220 homes. Stronger protection of hedgerows, bring adjacent woodland into management and improve PROW network. (Billericay Action Group RPLP/1147). Allocate land at Linda Gardens in preference to this allocation. (Millwood Designer Homes Ltd RPLP/1825). Policy should reference historic buildings nearby and a heritage impact assessment is required. (Historic England RPLP/2165). Flexibility over the housing number for this site is required, as it may be possible to provide up to 245 homes at 35duph. (BDW Eastern Counties RPLP/2187). Require a phase 1 Ecology Assessment. (Billericay District Residents Association RPLP/1638). Consult with Historic England. (Billericay Action Group RPLP/1147). More detailed assessments are needed regarding environmental matters. (Billericay Action Group RPLP/1147). 	
Policy H21: Self- Build Allocations	Objection: Negative impact on roads. Overdevelopment.	Policy H21 attracted some objections from residents, particularly H1c, which is for 6 self-build homes. These sites have been subject to sustainability appraisal, and have found to be appropriate. The

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	 Loss of greenbelt. (GBSG village Council RPLP/1918, Billericay Action Group RPLP/1148). Insufficient infrastructure improvements including education provision, healthcare and/or sustainable transport. (GBSG village Council RPLP/1918). Impact on road capacity. (GBSG village Council RPLP/1918). Impact on biodiversity. (GBSG village Council RPLP/1918). Impact on flood risk. (GBSG village Council RPLP/1918, Billericay Action Group RPLP/1148). Negative impact on biodiversity associated with site H21c. (Billericay Action Group RPLP/1148). Negative impact on air quality. All self build sites are in Billericay. (Billericay Action Group RPLP/1148). No need to make specific allocations in Green Belt for self-Build. (Billericay Action Group RPLP/1148). Promoter of site H21a objects to allocation as they wish to bring this site forward for traditional housebuilding, and suggest that this site is not required. (Inland Homes RPLP/2240). Other comment/s: Enable non internet users to respond to Plan. Sites not previously consulted on at Regulation 18. (Billericay Action Group RPLP/1148). 	Green Belt Topic Paper meanwhile indicates that the allocation of these sites will have limited impact on the overall function of the Green Belt. The Council is therefore satisfied that these allocations are soundly based. It is recognised that all of the self-build allocations identified in policy H21 are in Billericay. Smaller sites suitable for this type of development have not been promoted in Wickford, preventing allocations in that settlement. Within the Basildon urban area meanwhile a scheme comprising 242 custom build homes and 9 self build homes is currently under construction in Basildon, and a further custom build scheme of 12 homes is under construction in Laindon. This provision more than satisfied the self and custom build register as it current stands. On the above basis, it is suggested by a site promoter that allocation H21a should be allocated for traditional housebuilding

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	 No designated assets in site H21a, but Billericay Conservation area lies to the north. This should be referenced to achieve positive outcomes. (Historic England RPLP/2166). No designated assets in site 21b but Great Burstead conservation area lists to the west. This should be referenced to achieve positive outcomes. (Historic England RPLP/2166). Site H21c is adjacent a SAM. Whilst development has the potential to impact on the SAM the scale of the allocation is such that with careful design this can be avoided. Specific reference to the designation of Norsey Wood as a SAM should be included in the policy. (Historic England RPLP/2166). 	purposes rather than for self-build. The Council does not support this change. Some modifications to this policy are sought by Historic England. These modifications appear reasonable, given the matter raised, and amendments are supported in relation to the supporting text for sites H21a and H1b, and reference to the SAM designation should be made within the policy for site H21c for clarity.
	 Modification/s requested: Reduce housing numbers. Reference. Remove H21c. Redistribute self and custom build sites. Improve reference within the supporting text and policy to historic assets. (Historic England RPLP/2166). Remove site H21a from this policy and allocate it for housing as per allocations H5 to H20. (Inland Homes RPLP/2240). 	There is a comment on consultation in relation to this policy. The consultation for the Local Plan has exceeded the requirements of the regulations and achieved a high level of engagement. It is not considered that further consultation is therefore required at this time.
Policy H22: Housing Growth in Crays Hill	Support:Support for the allocation of site H22b. (R FJ Kadesh Builders PLP/2268).Objection:	It is noted that there are a small number of objections to this policy primarily from Local Residents. This policy was prepared having regard to the Serviced Settlement Review which considered all

Section/Para/ Policy	Summary of Responses	Council's response
	 Negative impact on roads in Crays Hill. H22a Land rear of Barnsfield is not deliverable due to inability to access the site safely from London Road. (Ramsden Crays Parish Council RPLP/4032). Lack of affordable housing. (Ramsden Crays Parish Council RPLP/4032). Negative impact on the character of the area. (Ramsden Crays Parish Council RPLP/4032). Reduces the openness of the green belt. (Ramsden Crays Parish Council RPLP/4032). 	of the promoted sites in this settlement on an individual basis, and identified those which might be suitably allocated for development having regard to local constraints. The Highway Authority were asked to comment on a draft of the review and their comments are reflected in the assessments conclusions. The allocations in Crays Hill are therefore considered suitable.
	 Modification/s requested: Remove the main road frontage developments to the eastern end of the village on grounds of negative impact on the view. Proposes creation of a small estate east of Crays Hill School. (Ramsden Crays Parish Council RPLP/4032). 	The Council does however agree that the size of the sites allocated does mean that affordable housing provision in this settlement is likely to be limited, as they would not meet the national policy restriction on this matter.
Policy H23: The Location of Residential Development	 Support: Support for policy H23. (Wick 3 Nominees Ltd RPLP/1942, Permission Homes RPLP/1967 and RPLP/2084, Gleeson Developments Ltd RPLP/1880, Taylor Wimpey RPLP/2034). Objection: Policy is not sufficiently flexible. (Gladman Devt Ltd RPLP/2025). 	The Council notes the comments received in relation to this policy, however remains satisfied that the policy is sufficiently flexible to enable housing to come forward in appropriate locations generally, and specifically in town centre locations.

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	 Modification/s requested: Make explicit the redevelopment and extension of town centre buildings for residential use. (Arcadis RPLP/2206). Only allow sites that meet NPPF requirements. 	
Policy H24: Applications for Gypsy and Traveller Sites and Travelling Showpeople Yards	 Support: 6 expressions of support to the criteria. Support for H24. (Rochford District Council RPLP/1663). Objection: The site does not satisfy H24 point 3 a to d. Unclear policy for G&T who fail the G&T test. No provision for providing pitches for those with a cultural need as part of the other housing policies. Local Plan fails to meet the requirements of PPTS in that the Gypsy and Traveller need assessment (GTAA) does not provide a robust evidence base to establish the need for Traveller pitches. Robustness of the evidence base due to poor interview rate, unsubstantiated assumption that only 10% of unknown households will have G&T status, failure to make an allowance for in migration, inadequate assessment of household formation rates, failure to publish results of Traveller status on a site by site basis, so that this can be checked. The absence of an analysis of planning applications/enforcement cases to inform the assessment. Lack of contingency plan. 	It is noted that the evidence base for this policy has been questioned. The evidence of need was produced by ORS, whose work has been found sound across the Country as one of just a handful of consultants to undertaken such assessments. It is also consistent with the work undertaken across Essex on this matter and secured an interview rate higher than that achieved elsewhere as a consequence of the Council getting additional round of interviews undertaken, surveying in winter months, and by employing an advocate to assist with the interview process in those parts of the Borough where the relationship with the Traveller community has been impacted by past enforcement action. The site provision work meanwhile has been undertaken by PBA, by an expert in this area, and is again considered robust having been based on a clear

Section/Para/ Policy	Summary of Responses	Council's response
	 Tolerated sites can be occupied by anyone as no restriction to G&T. Policy H24 re windfall sites is restrictive and rule out all Green Belt locations which are not allocated. Plan does not identify sufficient Traveller sites and fails to assess and allocate any transit site. Unacceptable that assessment of transit sites is not possible. A detailed appraisal was carried out by ORS as part of the Essex wide need assessment which found a high and increasing need for transit provision. The 2014 study recommend that provision be determined through discussions between local authorities and recommended that 2 publicly provided sites be provided. No such provision has been made. Additional plots would create imbalance between settled community and G&T provision. Lack of consultation. This does not comply with NPPF & PPTS. H24 is unsound (HHNF RPLP/ 1735). Modification/s requested: set out how to ensure adequate transit provision is made available now. Ensure policy complies with NPPF. Remove policy and consider as a separate entity. Clarity required on use of greenbelt. 	methodology that reviewed all sites promoted for this purpose, following a Call for Sites process. Having regard to the evidence, the Council is satisfied that the approach set out in policy H3 secures a five year supply of land for meeting the needs of Gypsies and Travellers, in locations they already call home, making use of land which is already in use rather than eroding the quality of greenfield Green Belt sites. It is noted that there is some preference for providing pitches alongside housing on allocation sites, and this was the approach proposed in the revoked March 2018 Publication Local Plan. However, that approach did not deliver a five-year supply of land for this purposes, and would have seen the Council unable to work with the Traveller community to resolve enforcement issues in the early part of the plan period.

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		A comment has been made in respect of this policy regarding transit sites. The supporting text to policy H1 makes clear that the requirement for transit sites will be picked up through further joint working by the EPOA. There is currently insufficient evidence to determine the types of transit sites required and the best locations for them within the County.
		A comment has also been made in respect of consultation. The Local Plan has been prepared having regard to substantial numbers of consultation responses received during the Regulation 18 consultations on the Basildon Borough Revised Preferred Options Core Strategy, the Draft Local Plan, and the New and Alternative Sites. This has helped the Council prioritise issues associated with accommodating development. The Regulation 18 consultation marks the start of the engagement stage of the Local Plan, and there is no requirement for the Council to

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		conduct further Regulation 18 consultations.
Policy H25: The Size and Types of Homes	 Objection: Remove policy and consider as a separate entity. Clarity required on use of greenbelt. Mix of housing types to meet needs of current and future households is prescriptive, inflexible and may restrict sustainable development and is not in accordance with NPPF. Should take account of the location and characteristics of the site, and/or market signals. (Taylor Wimpey RPLP/2035, (Estate and Agency Strategic Land LLP RPLP/2135) BDW Eastern Counties RPLP/2190, Arcadis RPLP/2207, Pigeon (Wickford) Ltd RPLP/2237, Inland Homes RPLP/2241, Redrow Homes Ltd RPLP/2219, Blue House Estate Limited and Gilbert Commercial Properties Limited RPLP/2112, Martin Grant Homes (UK) Ltd RPLP/1790, Explore Living Ltd RPLP/1840, Home Builders Federation RPLP/1858, Gladman Developments Ltd RPLP/2026). Questioning viability of combined CIL and affordable housing requirement on Billericay sites. (Billericay District Residents Association RPLP/1628). Minimum levels of specialist accommodation schemes for older people delivered by private developers should be lower than those developed under the Independent Living Programme. (The Retirement Housing Consortium RPLP/2684). 	It is noted that there are objections to the required housing size mix set out in policy H25, with claims it is not sufficiently flexible. In preparing this policy the Council used its evidence base set out in the SHMA 2016. However, it applied flexibility by combining the requirements for 1 and 2 bedroom properties noting that a high requirement for 1 bedroom properties may be challenging on sites on the edge of settlements. The NPPF requires at paragraph61 (NPPF Feb 19) that the size of housing need should be assessed and reflected in planning policies. The approach in policy H25, is therefore also consistent with national policy. The issue is raised that a separate size requirement should be set out for the affordable element of the housing provision. However, the evidence in the SHMA 2016 identified all needs. It is

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	 Modification/s requested: Size and type mix should be considered on a site by site basis to take into account any site specific characteristics, design requirements, market demands and/or viability. (Countryside Properties (UK) Ltd RPLP/1325, Taylor Wimpey RPLP/2035, Gleeson Developments/Avant Homes RPLP/1352). Specified mix of homes not in line with NPPF and does not take account of differing requirements of affordable and market sectors. (Martin Grant Homes (UK) Ltd RPLP/1790). Requirement of 10% of homes to be built in line with Part M4 (2) lacks justification, is not sufficiently flexible and does not take account of site specific factors and viability. The requirement is not justified by evidence. (Martin Grant Homes (UK) Ltd RPLP/1790, Taylor Wimpey RPLP/2035, Explore Living Ltd RPLP/1840, Inland Homes RPLP/2241, Explore Living Ltd RPLP/1840). A minor correction should also be made to part 4 of Policy H25 to refer to Part M4 (2) of the Building Regulations. This should clarify that the requirement relates to adaptable home. (Countryside Properties (UK) Ltd RPLP/1325, Taylor Wimpey RPLP/2035, Gleeson Developments/Avant Homes RPLP/1352). Amend 3 to insert 'where this would meet a need and unless it would be unviable or inappropriate.' (Taylor Wimpey RPLP/2035). 	therefore possible to extract the unit sizes needed for affordable housing (which due to the 'bedroom tax' are typically smaller) from the overall housing size mix. No amendment to policy H25 is therefore needed in respect of this issue. An objection has been raised in respect the requirement for on-site provision of accommodation for older people. The SHMA 2016 and the SHMA Addendum 2017 indicate that the need for older people's accommodation amounts to around 10% of housing need overall. The requirement for all large sites to make specialist accommodation provision and for all sites of 10 or more homes to deliver a minimum of 10% homes meeting Part M4 (2) makes a positive contribution to delivering homes suitable for but not limited to older persons and people with disabilities. This requirement was tested by the Whole Plan Viability Assessment and found to be generally viable across most sites. In addition, it is consistent with best

Section/Para/ Policy	Summary of Responses	Council's response
	 The size and type of properties required should be referred to in site specific policies. (Billericay District Residents Association RPLP/1628, Billericay Town Council RPLP/1925). The policy should be reworded to allow a mix of housing to come forward that is appropriate for the site and surroundings. (Explore Living Ltd RPLP/1840). Mix of housing types to meet needs of current and future households is prescriptive, inflexible and may restrict sustainable development. Part 2 be deleted and replaced with the following text: "When considering the mix of homes on sites of more than 100 units regard should be had to the most 	practice in the Essex Design Guide to secure the provision of accommodation for older people as part of larger sites for other housing types. This ensures that older people are not isolated from the community, helping improve their health and wellbeing. It is however noted that the reference to part M(2) should be corrected to Part 4M (2) to align with the building regulations
	 up to date evidence on housing mix." (Home Builders Federation RPLP/1858). Size and type mix is too inflexible and should be addressed on a site by site bases for sites of less than 150 units. (Blue House Estate Limited and Gilbert Commercial Properties Limited RPLP/2112). Adoption of National Space Standards is not supported by evidence, its impact on the delivery of starter homes for first time buyers has not been considered. (Home Builders Federation RPLP/1858, Gladman Developments Ltd RPLP/2026). Consideration will be given to schemes proposing a different housing mix where they relate to urban regeneration schemes to ensure the most effective use of urban land is attained or in accordance with the latest evidence in an up to date Strategic 	It is noted that the Retirement Housing Consortium can deliver viable private led schemes of a smaller scale than which can be secured via the Independent Living Programme. The difference in the viability assessments relates to the inclusion, or not, of revenue costs related to providing support for residents. The Council is satisfied however that the requirements of policy H25 do not prevent the delivery of smaller schemes for older people, and indeed some housebuilders may provide such schemes to meet part 4 of this policy. To

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	 Housing Market Assessment." (Estates and Agency Holdings Limited RPLP/2116). On dense urban sites, an alternative mix of dwelling types will be encouraged. (Infrared RPLP/2140). Replace 600 with 150 or 200 in paragraph 3 Policy H25. Policy requirements re specialist accommodation for older people is overly prescriptive, and ignores site characteristics or typology of any development proposed. (Infrared RPLP/2140). Additional flexibility sort on town centre sites in respect of size, space standards and amenity space. (Infrared RPLP/2140). Size and type mix is too inflexible, does not take account of nature or location of the site and may restrict delivery particularly of executive type dwellings. (Redrow Homes Ltd RPLP/2219). The Council must identify a need for specialist elderly accommodation and then identify locations to meet need. (Redrow Homes Ltd RPLP/2219). The requirement for new homes to meet the Nationally Described Space Standards is not justified and economic impact has not been justified. (Redrow Homes Ltd RPLP/2219). Revise to All sites delivering 10 or more homes should contribute towards meeting the identified target mix of new housing as set out by the SHMA. (Commercial Estates Group RPLP/2254, Estate and Agency Strategic Land LLP RPLP/2135). 	this end the Council does not believe this policy needs modifying. There are also objections to the application of the Nationally Described Space Standards in Basildon, claiming their use is not justified. In 2015 the Government introduced an options space standard 'Technical Housing Standards-Nationally Described Space Standards' Research by the Royal institute of British Architects in 2015 found that the average new home in England is only 92% of the NDSS. Basildon has a wide mix of housing types and there are no particular factors which support a need for properties in Basildon to differ from national standards. Furthermore, the use of permitted development rights to secure office to residential conversions has seen a number of homes enter the market which do not meet the standard, meaning that it is important to ensure that those homes that are built with planning consent are of a higher standard to off-set these smaller units,

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	 H25 (3) may lead to specialist accommodation being provided in only a small number of allocations and oversupply may result from provision from smaller sites. (Pigeon (Wickford) Ltd RPLP/2237). Size mix is too restrictive and does not take into a site specific characteristics. Amendment fort to either express the desired percentages as a range, or by the final mix being agreed on a site by site basis having regard to the most up to date evidence on housing need and any evidence regarding local market conditions. (Inland Homes RPLP/2241). Minimum levels of specialist accommodation schemes for older people delivered by private developers should be lower than those developed under the ILP. (The Retirement Housing Consortium RPLP/2684). 	which can absorb any demand for micro- living. In terms of viability, the requirement to apply these standards have been tested as part of the Whole Plan Viability Assessment and found to be generally viable. The Council is satisfied that the application of the Nationally Described Space Standard is justified in Basildon Borough.
Policy H26: Affordable Housing Provision	 Objection: Does not take account of broadened definition of affordable housing set out in NPPF. (Explore Living Ltd RPLP/1841). Approach to considering viability on allocated sites is too rigid and risks sites not being delivered. (Explore Living Ltd RPLP/1841, Blue House Estate Limited and Gilbert Commercial Properties Limited RPLP/2113, BDW Eastern Counties RPLP/2191, Pigeon (Wickford) Ltd RPLP/2238). On site provision of affordable housing requirement does not take account of changing circumstances over the plan period which may affect viability and could prevent strategic sites being delivered. (Gleeson Developments Ltd RPLP/1881). 	The Council recognises that there is a need to reference the broader definition of affordable housing in the supporting text to this policy. However, it is committed to delivering affordable housing which is more likely to be affordable to local people therefore, the Council cannot support a broadening of the tenure types identified in part 2 of this policy. Given the specific comments received, the Council is clear that Starter Homes and Discounted Market Units are

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	 Part 4 conflicts with part 6 of the Policy. (Gleeson Developments Ltd RPLP/1881). Policy H26 should be afforded the same weight as other relevant policies not significant weight. (Blue House Estate Limited and Gilbert Commercial Properties Limited RPLP/2113). Affordable housing provision should include discounted market units. (BDW Eastern Counties RPLP/2191). Evidence base should be amended to evidence that Starter Homes do not meet the needs of households assessed as needing Affordable Housing in Basildon Borough. Affordable housing requirement should be set out in site specific policies. (Billericay Town Council RPLP/1925). Site viability should be assessed at application stage. (The Retirement Consortium RPLP/2685). Set higher viability rates for Billericay and Wickford. Affordable housing is provided in perpetuity by a Registered provider. Insufficient flexibility in respect of allowing off site or cash inlieu AH provision and for considering viability of plan allocated sites risks sites not being delivered. (Land Group (Billericay) Ltd RPLP/1441). Compatibility of policy with paragraph64 of NPPF requiring at least 10% of homes on major development sites to be for affordable home ownership. (Rochford DC RPLP/1664). 	not affordable in Basildon Borough, and are not therefore supported by this policy. Some issues have been raised around the Council's intended approach to viability considerations regarding affordable housing. The Council, and the NPPF, are both clear that it should be aiming to create mixed and balanced communities unless alternative provision is robustly justified. The Whole Plan Viability Assessment has identified that most types of schemes will remain viable over time accounting for small fluctuations in costs or in the market and incorporating contingency for abnormal costs. Point 6 of H26 sets circumstances where viability assessment will be accepted including where there are exceptional development cost. A significant change in costs or market outside of the headroom allowed in the Whole Plan Viability Assessment may would trigger this element of the policy.

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	 60% market value should be changed to 60% of market rent. (Commercial Estates Group RPLP/2255). Modification/s requested: Does not take account of broadened definition of affordable housing set out in NPPF. (Explore Living Ltd RPLP/1841). Approach to considering viability on allocated sites is too rigid and risks sites not being delivered. (Explore Living Ltd RPLP/1841, Blue House Estate Limited and Gilbert Commercial Properties Limited RPLP/2113, BDW Eastern Counties RPLP/2191, Pigeon (Wickford) Ltd RPLP/2238). On site provision of affordable housing requirement does not take account of changing circumstances over the plan period which may affect viability and could prevent strategic sites being delivered. (Gleeson Developments Ltd RPLP/1881). Part 4 conflicts with part 6 of the Policy. (Gleeson Developments Ltd RPLP/1881). Policy H26 should be afforded the same weight as other relevant policies not significant weight. (Blue House Estate Limited and Gilbert Commercial Properties Limited RPLP/2113). Affordable housing provision should include discounted market units. (BDW Eastern Counties RPLP/2191). Evidence base should be amended to evidence that Starter Homes do not meet the needs of households assessed as needing Affordable Housing in Basildon Borough. 	It is also noted that a suggestion has been raised around seeking higher levels of affordable housing provision in Billericay and Wickford where viability is more favourable. This would however have an implication for the funding available for infrastructure provision as relatively higher CIL rates can be set in these settlements. The Council agreed to approach to maximising CIL rate at its meeting of the 18 October, reflecting the ambition of this plan to be infrastructure led. This amendment is not therefore supported. Specificity in relation to the size mix of affordable housing units within the policy has been sought. However, it is known from monitoring the Housing Register this need fluctuates over time, affected by changes in Government policy. Policy H26 states that the size and mix of affordable housing provision should be determined on a site by site basis in discussion with the Council's Housing Service, having regard to the Council's latest Housing Strategy and the overall

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	 Affordable housing requirement should be set out in site specific policies. (Billericay Town Council RPLP/1925). Site viability should be assessed at application stage. (The Retirement Consortium RPLP/2685). Set higher viability rates for Billericay and Wickford. Affordable housing is provided in perpetuity by a Registered provider. Insufficient flexibility in respect of allowing off site or cash inlieu AH provision and for considering viability of plan allocated sites risks sites not being delivered. (Land Group (Billericay) Ltd RPLP/1441). Compatibility of policy with paragraph64 of NPPF requiring at least 10% of homes on major development sites to be for affordable home ownership. (Rochford DC RPLP/1664). 60% market value should be changed to 60% of market rent. (Commercial Estates Group RPLP/2255). 	mix of development proposed and its locality. Further to this, there is a representation requesting that the affordable housing requirement for each housing allocation is set out in the allocation policies H5 – H20. The plan should be read as a whole, and therefore this amendment to the plan is not considered necessary. The alignment of this policy with the Revised NPPF requirement for 10% of homes to be for affordable home ownership has been questioned. The evidence base in the SHMA 2016 has been used to set out the mix of affordable housing required. The SHMA identified that only 30% of households unable to purchase a home on the open market can afford affordable home ownership options therefore a 70:30 tenure split between affordable rented housing and affordable home ownership options. This equates to 9.3% of homes on major development sites being for affordable home ownership. This is broadly, if not completely consistent with

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		the national policy requirement, which only came into effect shortly before the plan was approved for publication and submission. No modification is therefore supported by the Council in relation to this matter at this time.
		A representation has been received suggesting that the Council has not provided sufficient flexibility in relation to cash in lieu criteria within policy H26. The Council is clear that on-site provision of affordable housing is the preference, as it will best contribute towards overall Affordable Housing provision and the creation of mixed and sustainable communities. It is therefore of the view that its cash in lieu criteria are appropriate, and is not minded to amend the policy further in this regard.
		The Council does however agree that two technical amendments should be made to policy H26 to ensure it is effective. Firstly, it is agreed that part 4 should be amended to clarify that point 6(c) is applicable to all sites including

have been informed by an extensive

evidence base, drawn together in the Housing Options Topic Paper. The

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		H5-H20. Secondly, it is agreed that the reference to 60% market value should be amended to read 60% market rent, for the purpose of accuracy.
Policy H27: Houses in Multiple Occupation and the subdivision of Family Homes	No comments received.	
Policy H28: Maximising the Housing Stock	No comments received.	
Chapter 11: Delive	ering a Wide Choice of High Quality Homes – OMISSION SITES	
Omission Sites: WICKFORD	Other comment/s: • Developer is promoting Land South of London Road, Wickford for housing development. (Crest Nicholson RPLP/2068 and RPLP/2069). • Neighbourhood Forum is promoting land within the Hovefields & Honiley Neighbourhood Area, Wickford for housing	These sites have been tested for accommodating housing development through the local plan preparation process, but was discounted. The final selection of housing sites allocated within the Revised Publication Local Plan

development. (Hovefields and Honiley Neighbourhood Forum

RPLP/1716, Dale Farm Residents Group RPLP/3226, The Gypsy Council RPLP/3228).

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	 Developer is promoting Land at Dale Farm, Wickford for housing development. (Land Group (Billericay) Ltd RPLP/1440, Dale Farm Residents Group RPLP/3226, The Gypsy Council RPLP/3228). Developer is promoting a larger extent of land at H12 - Land South of Wickford, for housing development. (Pigeon (Wickford) Ltd RPLP/2224). 	Housing Options Topic Paper draws together evidence related to housing capacity and constraints on growth, and gives an explanation on how the Council has considered all the housing site options, using the extensive evidence base available to inform their decisions.
	 Modification/s requested: Allocate land south of London Road, Wickford for housing development. (Crest Nicholson RPLP/2068 and RPLP/2069). Allocate additional land within the Hovefields & Honiley Neighbourhood Area, Wickford for housing development. (Hovefields and Honiley Neighbourhood Forum RPLP/1716, Dale Farm Residents Group RPLP/3226, The Gypsy Council RPLP/3228). Allocate Land at Dale Farm, Wickford for housing development. (Land Group (Billericay) Ltd RPLP/1440, Dale Farm Residents Group RPLP/3226, The Gypsy Council RPLP/3228). Allocate larger extent of land at H12 - Land South of Wickford for housing development. (Pigeon (Wickford) Ltd RPLP/2224). 	
Omission Sites: BILLERICAY	Other comment/s: • The Council's evidence base does not support its decision to remove the additional 300 dwellings that could be brought	These sites have been tested for accommodating housing development through the local plan preparation process, but was discounted. The final

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	 forward on H17c, if an alternative route for the relief road was pursued. (Taylor Wimpey RPLP/2058). Developer is promoting additional Land at Kingsmans Farm, Billericay for housing development. (Taylor Wimpey RPLP/2061). Developer is promoting Land at Foots Farm, Billericay for housing development. (Brentwood Roman Catholic Diocese Trustee RPLP/1896). Developer is promoting Land at Potash Road, Billericay for housing development. (Jarvis Developments RPLP/2039). Developer is promoting Land off Outwood Farm Road, Billericay, for housing development. (David Wilson Homes Eastern Counties RPLP/2197). Developer is promoting Land South of Outwood Common Road, Billericay for housing development. (St Modwen Developments Ltd RPLP/2100). Developer is promoting Land North of Linda Gardens, Billericay for housing development. (Millwood Designer Homes Ltd RPLP/1821). Modification/s requested: Allocate the 300 dwellings previously identified at H17c. 	selection of housing sites allocated within the Revised Publication Local Plan have been informed by an extensive evidence base, drawn together in the Housing Options Topic Paper. The Housing Options Topic Paper draws together evidence related to housing capacity and constraints on growth, and gives an explanation on how the Council has considered all the housing site options, using the extensive evidence base available to inform their decisions.
	 Allocate the 300 dwellings previously identified at H17c. (Taylor Wimpey RPLP/2058). Allocate land at Kingsmans Farm, Billericay for housing development. (Taylor Wimpey RPLP/2061). 	

Section/Para/ Policy	Summary of Responses	Council's response
	 Allocate land at Foots Farm, Billericay for housing development. (Brentwood Roman Catholic Diocese Trustee RPLP/1896). Allocate land at Potash Road, Billericay for housing development. (Jarvis Developments RPLP/2039). Allocate land off Outwood Farm Road, Billericay for housing development. (David Wilson Homes Eastern Counties RPLP/2197). Allocate land south of Outwood Common Road, Billericay for housing development. (St Modwen Developments Ltd RPLP/2100). Allocate land north of Linda Gardens, Billericay for housing development. (Millwood Designer Homes Ltd RPLP/1821). 	
Omission Sites: BASILDON	 Support: Support the exclusion of Land North of Wash Road, Basildon from housing development. (Cllr Sargent RPLP/743). Other comment/s: Developer is promoting Land at Gifford House, Basildon for housing development. (AMS Care RPLP/2071). Developer is promoting Land North of Wash Road, Basildon for housing development. (Southern and Regional Development Ltd RPLP/2093 and RPLP/2094). Developer is promoting Land between the A13 and London Road, Basildon for housing development. (Via Whirledge and Nott RPLP/1565 and RPLP/1410). 	These sites have been tested for accommodating housing development through the local plan preparation process, but was discounted. The final selection of housing sites allocated within the Revised Publication Local Plan have been informed by an extensive evidence base, drawn together in the Housing Options Topic Paper. The Housing Options Topic Paper draws together evidence related to housing capacity and constraints on growth, and gives an explanation on how the Council

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	 Developer is promoting Anglian Water Site on Dry Street, Basildon for housing development. (Stonebond Properties Ltd RPLP/2031). Developer is promoting larger extent of land at H8 - West Basildon, for housing development. (Bellway Homes and Crest Nicholson RPLP/2250, Persimmon Homes RPLP/2081). Developer is promoting a larger extent of land at H7 - Land South of London Road, Vange, for housing development. (Estates and Agency Holdings Limited RPLP/2110). Developer is promoting North Benfleet Hall Farm, Basildon for housing development. (Orbit Homes 2020 Ltd RPLP/1518). Developer is promoting larger extent of land at H11 - East Basildon for housing development. (Halsbury Homes Ltd RPLP/1394, GL Hearn RPLP/2126). 	has considered all the housing site options, using the extensive evidence base available to inform their decisions.
	 Modification/s requested: Allocate land at Gifford House, Basildon for housing development. (AMS Care RPLP/2071). Allocate land north of Wash Road, Basildon for housing development. (Southern and Regional Development Ltd RPLP/2093 and RPLP/2094). Allocate Land between the A13 and London Road, Basildon for housing development. (Via Whirledge and Nott RPLP/1565 and RPLP/1410). Allocate Anglian Water Site on Dry Street, Basildon for housing development. (Stonebond Properties Ltd RPLP/2031). 	

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Chapter 11: Delive	 Allocate larger extent of land at H8 - West Basildon for housing development. (Bellway Homes and Crest Nicholson RPLP/2250, Persimmon Homes RPLP/2081). Allocate larger extent of land at H7 - Land South of London Road, Vange for housing development. (Estates and Agency Holdings Limited RPLP/2110). Allocate North Benfleet Hall Farm, Basildon for housing development. (Orbit Homes 2020 Ltd RPLP/1518). Allocate larger extent of land at H11 - East Basildon for housing development. (Halsbury Homes Ltd RPLP/1394, GL Hearn RPLP/2126). 	
New Sites: WICKFORD	 Other comment/s: Developer is promoting Land at Shot Farm, Wickford for housing development. (Acropolis Capital Limited RPLP/2037). Landowner is promoting Land at 286 London Road, Wickford for housing development. (Via Mark Jackson Planning RPLP/2279). Landowner is promoting Land at Castledon Road, Wickford for housing development. (Via Markides Associates RPLP/5018). Modification/s requested: Allocate land at Shot Farm, Wickford for housing development. (Acropolis Capital Limited RPLP/2037). 	With regard to Land at Shot Farm, Wickford, the Council's evidence base does not currently support the allocation of this site. The site was tested as part of the 26 Broad Locations used to consider alternative ways of distributing development in the Green Belt, as set out in the SA for the Core Strategy Revised Preferred Options Report (2013). This included consideration of environmental issues, infrastructure, deliverability and Sustainability

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	 Allocate Land at 286 London Road, Wickford for housing development. (Via Mark Jackson Planning RPLP/2279). Allocate land at Castledon Road, Wickford for housing development. (Via Markides Associates RPLP/5018). 	Appraisal. The development of this site was however discounted by the Council and has not taken forward in the development of site allocations. Any approach taken in considering this site further will need to be subject to the same suite of evidence base as with the rest of the housing site allocations. With regard to Land at 286 London Road, Wickford the Council's evidence base does not currently support the allocation of this site. The site was tested as part of the 26 Broad Locations used to consider alternative ways of distributing development in the Green Belt, as set out in the SA for the Core Strategy Revised Preferred Options Report (2013). This included consideration of environmental issues, infrastructure, deliverability and Sustainability Appraisal. The development of this site was however discounted by the Council and has not taken forward in the development of site allocations. Any approach taken in considering this site further will need to

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		environmental issues, infrastructure, deliverability and Sustainability Appraisal. The development of this site was however discounted by the Council and has not taken forward in the development of site allocations. Any approach taken in considering this site further will need to be subject to the same suite of evidence base as with the rest of the housing site allocations.
New Sites: BASILDON	 Other comment/s: Developer is promoting Land South of Dunton Road, Basildon for housing development. (Bloor Homes Eastern RPLP/1596). Landowner is promoting Land at Winifred Cottage and Burwood Works, Basildon for housing development. (Via Mark Jackson Planning RPLP/2270). Developer is promoting Land to the South of Basildon Zoo, London Road, Basildon for housing development. (Chelmsford Diocese Board of Finance RPLP/2267). Developer is promoting Lynton Park in Dunton, Basildon for housing development. (Westlands Farm Developments Ltd RPLP/3146). Modification/s requested: Allocate land south of Dunton Road, Basildon for housing development. (Bloor Homes Eastern RPLP/1596). 	The Council's evidence base does not currently support the allocation of these sites. The sites were tested as part of the 26 Broad Locations used to consider alternative ways of distributing development in the Green Belt, as set out in the SA for the Core Strategy Revised Preferred Options Report (2013). This included consideration of environmental issues, infrastructure, deliverability and Sustainability Appraisal. The development of these sites was however discounted by the Council and has not been taken forward in the development of site allocations. Any approach taken in considering these

Section/Para/ Policy	Summary of Responses	Council's response
	 Allocate Land at Winifred Cottage and Burwood Works, Basildon for housing development. (Via Mark Jackson Planning RPLP/2270). Allocate Land to the South of Basildon Zoo, Basildon for housing development. (Chelmsford Diocese Board of Finance RPLP/2267). Allocate Lynton Park in Dunton, Basildon for housing development. (Westlands Farm Developments Ltd RPLP/3146). 	sites further will need to be subject to the same suite of evidence base as with the rest of the housing site allocations. Specifically, with regard to Lynton Park in Dunton, Basildon, this site has been tested for accommodating housing development through the local plan preparation process as part of a wider H8 allocation, but this was discounted. Lynton Park has however not been tested as a stand-alone development, therefore any approach taken in considering this site will need to be subject to the same suite of evidence base as with the rest of the housing site options previously considered.
Chapter 12: Requ	iring Good Design	
Chapter 12: Requiring Good Design	Support: • General support for design policies. (Natural England RPLP/2554). Objection:	Matters related to building sustainability are dealt with by Policy CC5 - Sustainable Buildings - New Builds.

Section/Para/ Policy	Summary of Responses	Council's response
	BREEAM principles should be mandatory in all developments to ensure sustainability.	
Policy DES1: Achieving Good Design	 Support: General support for Policy DES1. (Historic England RPLP/2167, Sport England RPLP/823, Rochford District Council RPLP/1665). Objection: Policy DES1 should address the needs of all vulnerable road users. (Essex Bridleways Association RPLP/365). Policy DES1 does not adequately reflect the need to increase housing densities on housing allocation sites. Policy DES1 is complex and vague, and it is unclear how the policy will help in achieving good design. (Explore Living Ltd RPLP/1842, Home Builders Federation RPLP/1816, Wick 3 Nominees Ltd RPLP/1944, Persimmon Homes RPLP/1970 and RPLP/2098, Gladman Developments Ltd RPLP/2027). Policies DES1 and DES4 should be combined as one policy to avoid duplication. (Taylor Wimpey RPLP/2048, Gladman Developments Ltd RPLP/2028). It is unclear how policies DES1-4 would be applied in delivering the specific requirements of allocation H12. (Pigeon (Wickford) Ltd RPLP/2229). 	The Council considers that Policy DES1 sets out a clear strategic framework of how the Council will respond to its vision and objectives for achieving good design, in accordance with the NPPF. The development management policies as set out in Policies DES3 - DES7 are intended to be applied through the planning application process, to ensure that new development contributes towards the Council's vision and objectives. The SA has considered this policy and identifies that it has significant positive effects, and no significant adverse effects. This policy is generally supported by statutory bodies, although some modifications are also sought to enhance the policy, as follows: • Amend policy DES1 to address the needs of all vulnerable road users;
	Carlor comments.	

Section/Para/ Policy	Summary of Responses	Council's response
	 Seeks wording changes to paragraph 12.7, with respect to the Active Design principles. (Sport England RPLP/823). Requests that specific reference be made to the Essex Design Guide within the body of the policy. (Rochford District Council RPLP/1665). Specific reference should be made to 'Streets for All' guidance within the body of the policy. (Historic England RPLP/2167). Modification/s requested: Amend policy DES1 to address the needs of all vulnerable road users. (Essex Bridleways Association RPLP/365). Amend paragraph 12.7 to correctly reference the number of Active Design principles. (Sport England RPLP/823). Make specific reference to the Essex Design Guide within the body of the policy. (Rochford District Council RPLP/1665). Policy DES1 should be amended to adequately reflect the need to increase housing densities on housing allocation sites. Provide further clarity within policy DES1 as to how the policy will help achieve good design as it is currently complex and vague. (Explore Living Ltd RPLP/1842, Home Builders Federation RPLP/1816, Wick 3 Nominees Ltd RPLP/1944, Persimmon Homes RPLP/1970 and RPLP/2098, Gladman Developments Ltd RPLP/2027). Combine policies DES1 and DES4 to avoid duplication. (Taylor Wimpey RPLP/2048, Gladman Developments Ltd RPLP/2048). 	 Amend paragraph 12.7 to correctly reference the number of Active Design principles. Make specific reference to the Essex Design Guide within the body of the policy. Reference be made to 'Streets for All' guidance within the body of the policy. These modifications are supported by the Council. There were suggestions by site promoters that this policy should be combined with DES4 however, policy DES1 sets out a strategic framework of how the Council will respond to its vision and objectives for achieving good design, in accordance with the NPPF. Whereas, Policy DES4 is intended to be applied through the planning application process, to ensure that new development contributes towards the vision and objectives set within DES1. The Council does not therefore agree with this proposal.

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	 Requests that specific reference be made to 'Streets for All' guidance within the body of the policy. (Historic England RPLP/2167). 	
Policy DES2: Areas of Special Development Control	 Support: General support for policy DES2. (Historic England RPLP/2168). Support for Part 1 of policy DES2. (Bowers Gifford and North Benfleet Parish Council RPLP/3702). Objection: It is unclear how policies DES1-4 would be applied in delivering the specific requirements of allocation H12. (Pigeon (Wickford) Ltd RPLP/2229). 	Policies DES1 to DES4 would expect the proposals for H12 to be well designed, with good quality landscaping and public realm.
Policy DES3: Urban Character Areas	 Support: Support for policy DES3. (Historic England RPLP/2169, Cllr Sargent RPLP/742). Objection: It is unclear how policies DES1-4 would be applied in delivering the specific requirements of allocation H12. (Pigeon (Wickford) Ltd RPLP/2229). Policy DES3 is not relevant to Bowers Gifford and North Benfleet, as a Neighbourhood Plan will replace the policy. (Bowers Gifford and North Benfleet Parish Council RPLP/3704). 	Policy DES3 is based on the Urban Characterisation and Design Review Study which identifies, describes and analyses the character and quality of the Borough and its different areas. Neighbourhood Plans, where they exist, are intended to supplement policies within the Local Plan and not replace them. Neighbourhood Plans could therefore set out additional planning policies for the management of development within their areas. Such policies will be expected to comply with

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	Modification/s requested: • The reference to Bowers Gifford and North Benfleet should be removed from Policy DES3. (Bowers Gifford and North Benfleet Parish Council RPLP/3704).	all relevant policies within the Local Plan. In this case, the NPPF requires Local Plans to include robust and comprehensive policies that set out the quality of development expected in an area based on an understanding and evaluation of its defining characteristics. It is considered that policy DES3 is essential to fulfil the requirements of the NPPF.
Policy DES4: High Quality Buildings	 Support: General support for policy DES4, and requests that reference be made to the historic environment within the body of the policy. (Historic England RPLP/2170). Objection: Policies DES1 and DES4 should be combined as one policy to avoid duplication. (Taylor Wimpey RPLP/2048, Gladman Developments Ltd RPLP/2028). It is unclear how policies DES1-4 would be applied in delivering the specific requirements of allocation H12. (Pigeon (Wickford) Ltd RPLP/2229). Having a generic reference to building adaptability within policy DES4 contradicts with national guidance regarding optional technical housing standards. (Countryside Properties (UK) Ltd RPLP/1326, Gleeson Developments/Avant Homes 	Some site promoters sought for this policy to be deleted and combined with policy DES1. Policy DES1 sets out a strategic framework of how the Council will respond to its vision and objectives for achieving good design, in accordance with the NPPF. Whereas, Policy DES4 is intended to be applied through the planning application process, to ensure that new development contributes towards the vision and objectives set within DES1. The Council does not therefore agree with this amendment. Furthermore, some site promoters felt that this policy should be simplified

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	 RPLP/1357, Home Builders Federation RPLP/1862, Wick 3 Nominees Ltd RPLP/1945, Persimmon Homes RPLP/1971 and RPLP/2101). There is an overlap between policies DES4 and DES5. (Homes Builders Federations RPLP/1861, Wick 3 Nominees/1944, Persimmon Homes RPLP/1970 and RPLP/2098). Policies DES4 and DES5 should be simplified, as the details set out within the policies would be more appropriate in an SPD. (Homes Builders Federations RPLP/1861, Wick 3 Nominees/1944, Persimmon Homes RPLP/1970 and RPLP/2098). Policy DES4 does not address matters relating to sustainable transport, energy efficiency, active lifestyles, pollution control and improvements to the highway network. Modification/s requested: Combine policies DES1 and DES4 to avoid duplication. (Taylor Wimpey RPLP/2048, Gladman Developments Ltd RPLP/2028). Amend policy DES4 to ensure it is consistent with national policy and guidance. (Countryside Properties (UK) Ltd RPLP/1326, Gleeson Developments/Avant Homes RPLP/1357, Home Builders Federation RPLP/1862, Wick 3 Nominees Ltd RPLP/1945, Persimmon Homes RPLP/1971 and RPLP/2101). 	alongside policy DES5. It is considered that both policy DES4 and DES5 provide detailed guidance needed for the provision and enhancement of public realm and landscaping features, in order to achieve the requirements of the NPPF. While Supplementary Planning Documents could be prepared where considered necessary, the policies within the Local Plan establish the design principles which can then be supported by further guidance on specific elements of development within SPDs. However, it is noted that the policy needs to align with national policy set out in the NPPF, which changed when the Local Plan was close to finalisation. It is also noted that this policy and policy DES5 should not duplicate one another. Therefore, modifications which align this policy with the NPPF and avoid duplication with policy DES5 are supported by the Council. Historic England also commented on this policy seeking specific reference to the

Section/Para/ Policy	Summary of Responses	Council's response
	 Reference should be made to the historic environment within the body of policy DES4. (Historic England RPLP/2170). Review policies DES4 and DES5 to ensure there is no duplication. (Homes Builders Federations RPLP/1861, Wick 3 Nominees/1944, Persimmon Homes RPLP/1970 and RPLP/2098). Policies DES4 and DES5 should be simplified, as the details set out within the policies would be more appropriate in an SPD. (Homes Builders Federations RPLP/1861, Wick 3 Nominees/1944, Persimmon Homes RPLP/1970 and RPLP/2098). Policy DES4 should be amended to promote sustainable transport options and to encourage active lifestyles. 	historic environment within it. This amendment is supported. ECC meanwhile sought for reference to sustainable transport options. As this policy is about the specifics of the built form, it is not considered that this matter is relevant to this specific policy. Furthermore, the plan should be read as a whole, and this matter is covered in detail in chapter 9.
Policy DES5: High Quality Landscaping and Public Realm Design	 Support: General support for policy DES5. (Historic England RPLP/2171). General support for Policy DES5. (Natural England RPLP/2554). Objection: Policies DES4 and DES5 should be simplified, as the details set out within the policies would be more appropriate in an SPD. (Homes Builders Federations RPLP/1861, Wick 3 Nominees/1944, Persimmon Homes RPLP/1970 and RPLP/2098). 	It is noted that the statutory consultees, Natural England and Historic England generally support this policy. Historic England did however seek that reference be made to the historic environment within the body of the policy. The amendment would ensure that regard is had to updated practical advice when planning and implementing public realm works in sensitive historic locations and therefore this amendment is supported by the Council. Meanwhile, Natural England suggested reference could be

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	 The requirements under Parts 3(a) to 3(g) of policy DES5 should be removed. (Countryside Properties (UK) Ltd RPLP/1328, Gleeson Developments/Avant Homes RPLP/1359). The requirement for development proposals to include a detailed Landscape Strategy, approved by the Council, at the planning application stage is impractical. (Countryside Properties (UK) Ltd RPLP/1328, Gleeson Developments/Avant Homes RPLP/1359). Developers should not be expected to make payments for the continued maintenance of the public realm, as this has not been factored into the viability assessments. (Home Builders Federation RPLP/1864, Wick 3 Nominees Ltd RPLP/1946, Persimmon Homes RPLP/1972 and RPLP/2104). The additional cost of reinstating incidental landscaping that will be disturbed or removed during construction of development, have not been factored into viability assessments. (Home Builders Federation RPLP/1864, Wick 3 Nominees Ltd RPLP/1946, Persimmon Homes RPLP/1972 and RPLP/2104). Policy DES5 duplicates the requirement of Policy HC2 in terms of open space provision. (Pigeon (Wickford) Ltd RPLP/2229). Other comment/s: Requests that reference be made to the historic environment within the body of the policy. (Historic England RPLP/2171). 	made within the policy to the incorporation of multi-functional Green Infrastructure within urban development. This modification would ensure that new development contributes towards environmental well-being, which is one of the strategic objectives of the plan, and is therefore also supported. A number of those promoting sites for development in the Borough meanwhile objected to this policy and sought amendments. In particular they sought detail to be removed from the policy. However, the Council consider it is necessary to specify certain criteria to be included within a Landscape Strategy, in order to prevent the unnecessary loss of landscape features or a lack of provision of new landscaping as part of development proposals. Some site promoters also raised challenges around the costs associated with this policy. The Basildon Local Plan and CIL Viability Update Study 2018 makes reference to 'other residential

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	 Modification/s requested: Policies DES4 and DES5 should be simplified, as the details set out within the policies would be more appropriate in an SPD. (Homes Builders Federations RPLP/1861, Wick 3 Nominees/1944, Persimmon Homes RPLP/1970 and RPLP/2098). The requirements under Parts 3(a) to 3(g) of policy DES5 should be removed. (Countryside Properties (UK) Ltd RPLP/1328, Gleeson Developments/Avant Homes RPLP/1359). Remove the requirement for development proposals to include a detailed Landscape Strategy, approved by the Council, at the planning application stage because it is impractical. (Countryside Properties (UK) Ltd RPLP/1328, Gleeson Developments/Avant Homes RPLP/1359). Developers should not be expected to make payments for the continued maintenance of the public realm, as this has not been factored into the viability assessments. (Home Builders Federation RPLP/1864, Wick 3 Nominees Ltd RPLP/1946, Persimmon Homes RPLP/1972 and RPLP/2104). Remove the requirement to pay the additional cost of reinstating incidental landscaping that will be disturbed or removed during construction of development. (Home Builders Federation RPLP/1864, Wick 3 Nominees Ltd RPLP/1946, Persimmon Homes RPLP/1972 and RPLP/2104). 	development costs' associated with residential build costs. This input incorporates all additional costs associated with the site curtilage of the built area, including incidental landscaping costs. Specific comments were also made in respect of maintenance costs, as mentioned in Part 4. It is reasonable for the Council to expect site developers to consider and contribute towards the long-term maintenance of public realm they provide, or is provided nearby in order to make a development acceptable in planning terms. It is only appropriate that maintenance is mentioned in this policy, although it is agreed that some clarification could be provided in this respect. One site promoter has suggest that policy DES5 should be deleted in its entirety as it duplicates policy HC2. Policy DES5 relates to the provision of landscaping and public realm alongside new development, which is clearly distinct from the provision of recreation

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	 Requests that reference be made to the historic environment within the body of the policy. (Historic England RPLP/2170). Amend policy DES5 as it currently duplicates the requirement of Policy HC2 in terms of open space provision. (Pigeon (Wickford) Ltd RPLP/2229). Reference be made within the policy to the incorporation of multi-functional Green Infrastructure within urban development. (Natural England RPLP/2554). 	and leisure facilities addressed within Policy HC2. The NPPF emphasises the importance of planning positively for well-designed places which seek positive improvements to the arrangement and design of buildings, public spaces, landscapes, services, and amenities, and the Council is not therefore minded to support this suggested amendment. Several site promoters have raised a concern about when the Landscape Strategy should be approved by the Council. As currently worded they are concerned this needs to occur before the planning application is made. The Council notes this concern and agrees that Policy DES5 in this regard for the purpose of clarity.
Policy DES6: Public Art and Cultural Interpretation	 Objection: There is no evidence to support the requirement for public art to be provided at a value equivalent to 1% of the construction value of the development. (Countryside Properties (UK) Ltd RPLP/1330, Gleeson Developments/Avant Homes RPLP/1361). 	Policy DES6 has been informed by the Essex Public Art Guide. It was considered whether a reasonable policy alternative would be to relax the requirement for the provision of public art. Whilst this alternative could be seen as more flexible, a less stringent criteria

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	 There is no evidence to support the requirement for public art to be provided as part of new development. (Gladman Developments Ltd RPLP/2029, Home Builders Federation RPLP/1866, Wick 3 Nominees Ltd RPLP/1948, Persimmon Homes RPLP/1973, Pigeon (Wickford) Ltd RPLP/2229). The requirement to provide public art as part of new development would make the development unviable. (Taylor Wimpey RPLP/2045). The provision of public art within new development should not be a policy requirement, but should be considered on a case by case basis. (Persimmon Homes RPLP/2105, Redrow Homes Ltd RPLP/2221). 	would not provide a sufficient degree of certainty regarding the provision of public art. The alternative policy approach was therefore rejected. The policy has been tested within the SA and achieves the right balance to enhance the borough's public realm, whilst it is flexible enough to allow the reinstatement of public art in certain circumstances, subject to viability.
	 Modification/s requested: Remove requirement to provide public art at a value equivalent to 1% of the construction value of the development. (Countryside Properties (UK) Ltd RPLP/1330, Gleeson Developments/Avant Homes RPLP/1361). Remove the requirement for public art to be provided as part of new development. (Gladman Developments Ltd RPLP/2029, Pigeon (Wickford) Ltd RPLP/2229). Remove the public art requirement for new developments and assess it on a case by case basis. (Persimmon Homes RPLP/2105, Redrow Homes Ltd RPLP/2221, Home Builders Federation RPLP/1866, Wick 3 Nominees Ltd RPLP/1948, Persimmon Homes RPLP/1973). 	

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Chapter 13: Prom	Chapter 13: Promoting Healthy Communities			
Chapter 13: Promoting Healthy Communities	 Objection: No infrastructure proposed to support growth. Other comment/s: Little information provided in the plan on how education facilities will be provided or paid for. (Billericay Action Group RPLP/2040). The expansion of Brightside is to support background growth, not the growth planned in the local plan. There are access issues with the Brightside School. (Billericay Action Group RPLP/2040). Queries the potential to expand Sunnymede School. (Billericay Action Group RPLP/2040). There are no proposals to expand secondary provision in Billericay, which is popular. (Billericay Action Group RPLP/2040). The open space deficit in Billericay will be worsened by the plan. (Billericay Action Group RPLP/2040). The Billericay Action Group propose a series of specific local open space improvements. (Billericay Action Group RPLP/2040). 	A series of objections have been raised by the Billericay action group in relation to the provision of community infrastructure to serve the settlement. The Council has worked closely with the Education Authority and the NHS to understand the implications of the growth set out in the plan, and make provision for facilities to support growth in Billericay. Neither organisation is consequently objecting to the plan in this regard. In relation to open space provision, there are standards set out in the plan which are equally applicable to Billericay as any other settlement in the Borough. This will result in increased provision rather than a worsening of provision. There is an assumption that Basildon Hospital must grow to accommodate growth. The Basildon and Thurrock University Hospital have however been		

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	Hospital facilities in South Essex, including Basildon hospital, are operating above capacity and unable to accommodate further growth. (Billericay Action Group RPLP/2040).	working with the Council under a MoU to deliver more services within the community, increasing capacity in an alternative way. Furthermore, it should not necessarily be assumed that planned growth increases demand for acute health services, when good quality homes can improve the health and wellbeing of occupants.
Policies HC1 - HC3	Objection: The plan does not make provision for new GP surgeries to support growth. There is insufficient capacity in schools to support growth.	Residents have raised objections in relation to the provision of community infrastructure within the plan. The Council has worked closely with the Education Authority and the NHS to understand the implications of the growth set out in the plan, and make provision for facilities to support growth. Neither organisation is consequently objecting to the plan in this regard, bar some outstanding matters of detail regarding school provision in Noak Bridge.
Paragraph 13.5 Policy HC1: Health and Wellbeing Strategy	Other comment/s: • Update reference to Essex Joint Health and Wellbeing Strategy 2018 - 22 published in 2018. The objectives for this strategy are consistent with previous. (Essex County Council RPLP/1777 and RPLP/1727).	ECC have sought an amendment to ensure the most recent Health and Wellbeing Strategy is referenced. This is supported as a clarification arising due to the passage of time.

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(Policy Context – supporting text)	Modification/s requested: • Update reference to Essex Joint Health and Wellbeing Strategy 2018 - 22 published in 2018. The objectives for this strategy are consistent with previous. (Essex County Council RPLP/1777 and RPLP/1727).	
Policy HC1: Health and Well- being Strategy	 Support: Supported as it seeks to promote physical activity, and requires active design. (Sport England RPLP/822). The policy is consistent with section 8 of the NPPF, the local plans strategic objective 8, and also the Governments current sport strategy Sporting Futures. (Sport England RPLP/822). References to Active Design and Sport England's Active Nation Strategy in the supporting text is welcomed as this provides guidance on implementation. (Sport England RPLP/822). Reference to Active Essex is welcomed as it provides local context. (Sport England RPLP/822). Support for the principles in policy HC1. (Rochford District Council RPLP/1666). Policy HC1 will have mutual cross-boundary benefits. (Rochford District Council RPLP/1666). The provisions of policy HC1 are supported. Objection: 	There is a level of support for this policy amongst statutory bodies. However, there are areas of objection which do need to be responded to. Those promoting sites have expressed a concern about the requirement for Health Impact Assessments, and seek for policy HC1 to be deleted. Policy HC1 covers more than just a requirement for HIA so to delete the entire policy is inappropriate. There is clear evidence of health inequalities in Basildon, as set out in the Health and Wellbeing Topic Paper. It is considered that the requirement for HIAs is justified in relation to that evidence, as it will help to ensure that new development contributes towards good health and wellbeing and does not exacerbate poor health outcomes. It is

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	 The requirement for HIA for 50 homes plus is not justified, and there is no evidence to indicate there will be benefits to health in requiring developments of this scale to provide a HIA. (Explore Living Ltd RPLP/1843, Home Builders Federation RPLP/1867, Wick 3 Nominees Ltd RPLP/1950 and RPLP/1974, Persimmon Homes RPLP/2106). HIA is an unnecessary burden on developers. (Home Builders Federation RPLP/1867, Wick 3 Nominees Ltd RPLP/1950 and RPLP/1974, Persimmon Homes RPLP/2106). No indication within the policy as to what should be done in the decision making process with the HIA. (Home Builders Federation RPLP/1867, Wick 3 Nominees Ltd RPLP/1950 and RPLP/1974, Persimmon Homes RPLP/2106). The requirement for HIA for 50 homes plus places an unnecessary burden on smaller scale developers. (Blue House Estate Limited and Gilbert Commercial Properties Limited RPLP/2115). The level of growth will result in Billericay becoming a 'London Borough'. It is for the local plan to make provision for health infrastructure. (Wick 3 Nominees Ltd RPLP/1950 and RPLP/1974, Persimmon Homes RPLP/2106). The plan does not make provision for new GP surgeries to support growth. Hospital is already operating over capacity, resulting in poor health outcomes. It cannot accommodate growth. 	however noted that the policy is not clear on how the HIA will be used to assess planning applications and therefore the Council agrees that a modification to policy HC1 should be made to clarify this point. A number of objections have also been made to the Local Plan in respect of health infrastructure suggesting it contains insufficient information, and insufficient provision. However, the plan ensures that developments are required to provide additional infrastructure as determined necessary by the service providers to support the growth arising as part of their individual allocation policies. Discussions with service providers has indicated that this is possible and there are no objections in this regard. There is also a suggestion that the plan should have been developed so as to only permit development within 30 minutes public transport of the hospital, or else for a new hospital to be provided

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	 Plan does not have regard to the health and wellbeing of the Billericay area. Growth will increase the levels of pollution, challenging the capacity of health care services. The stress of overcrowded trains will impact on healthcare services. A new settlement at Dunton would have sufficient GP provision. The plan does not make provision for new GP surgeries to support growth. Development in Billericay (specifically Tye Common Road area) will increase air pollution. Sustainable and active travel will not reduce the dominance of private vehicles. The plan discriminates against people in Wickford because they are more than 30 minutes from a general hospital during peak time traffic, and it does not make provision for a general hospital in Wickford. Homes should not be provided in areas with poor access to the hospital, as this means there is poor access for ambulances. Providing additional healthcare services will affect the ability of the hospital to cope, due to staff resourcing. There is insufficient capacity in schools to support growth. The plan does not make provision for new schools. School expansion will result in a loss of playing fields to the detriment of children's wellbeing. 	in the northern part of the Borough. The plan provides the flexibility for health service providers to provide more community services reducing the need to travel to hospital in the first instance. The plan also places an emphasis on reducing congestion and improving accessibility to services by sustainable travel means. This is not therefore a reason to limit growth in the northern part of the Borough, which is within 30 minutes of the hospital at non-peak times. It should be noted that the NHS has no proposals for a new general hospital in South Essex, and therefore making land available for such a purpose is not justified. Comments have also been made in respect of the relationship between housing and health more generally, suggesting more housing automatically causes greater impacts. However, there is an evidenced positive link between the provision of high quality homes and health outcomes, not a negative one as suggested.

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	 The level of school provision proposed is insufficient. Other comment/s: The policy should include horse-riding which is a popular sport amongst women and children, target groups for the uptake of exercise. (Essex Bridleways Association RPLP/366). Modification/s requested: Amend the policy to include horse-riding which is a popular sport amongst women and children, target groups for the uptake of exercise. (Essex Bridleways Association RPLP/366). Delete policy HC1. (Blue House Estate Limited and Gilbert Commercial Properties Limited RPLP/2115, Home Builders Federation RPLP/1867, Wick 3 Nominees Ltd RPLP/1950 and RPLP/1974, Persimmon Homes RPLP/2106, Explore Living Ltd RPLP/1843). Reduce the number of houses to the H17c H17d H17a, unless more doctors, transport and a primary school are included. Do not bring any more people into this area until the local hospital/medical service is functioning properly for the people who already live here. Revise the Plan to have regard to the health and wellbeing of the Billericay area. More should be spent on schools and GP's. Reduce likelihood of increased air pollution in Billericay. 	Comments have also been made in respect of the provision of housing and poor air quality. Air quality matters have been considered across the Borough and the evidence suggests that air quality is generally below European Limits, with specific proposals being developed for those areas where challenges are arising. Measures are included within the local plan to manage congestion and encourage sustainable and active travel. Electric vehicles are also encouraged. These measures to limit the use of private vehicles are consistent with national policy. The matter of staff resourcing within the NHS has also been raised. Staff resourcing sits outside the scope of the Local Plan, but is something that the CCG and NHS are aware of and planning to address. The provision of good quality housing, town centre regeneration and environmental enhancements will however make Basildon an attractive place for

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	 Growth should be directed to those locations within 30 minutes public transport of a general hospital. A new hospital should be provided to serve those with poor access. 	healthcare professionals to come and live and work. Finally, the Bridleway Association have sought specific reference to horse riding in this policy. The Council are of the view that by referencing Public Rights of Way (which include Bridleways) this requested amendment could be made to this policy. Education matters are dealt with in respect of policy H3 which follows.
Paragraphs 13.16 – 13.19 Policy HC2: Strategic Approach to Leisure and Recreation	 Other comment/s: Should modify policy HC2 to include reference to the provision of a Country Park as part of the Bowers Gifford and North Benfleet Neighbourhood Plan. (Bowers Gifford and North Benfleet Parish Council RPLP/3693). Modification/s requested: Modify the wording of the strategic policy in both HC2 and HC3 to refer to the obligations of policies SD2 and SD3 in respect of the Bowers Gifford & North Benfleet Neighbourhood Plan housing allocation. (Bowers Gifford and North Benfleet Parish Council RPLP/3693). 	Bowers Gifford and North Benfleet Parish Council seek for the Local Plan to be amended to include the proposals they intend to include within their neighbourhood plan for a Country Park. There is no evidence to justify identifying this requirement within Policy HC2. This location is already well served by Country Park provision with Watt Tyler Country Park to the South East of the Neighbourhood area within Basildon Borough, and Hadleigh Castle Country Park a few miles to the East. It is a local

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		aspiration. This will need to be justified through the Bowers Gifford and North Benfleet Neighbourhood Plan.
Paragraphs 13.20 – 13.25 Policy HC2: Strategic Approach to Leisure and Recreation	 Other comment/s: Update paragraphs 13.20 to 13.25 to reflect the now published Basildon and overarching South Essex Playing Pitch and Built Facilities Strategies. (Sport England RPLP/824). Modification/s requested: Update paragraphs 13.20 to 13.25 to reflect the now published Basildon and overarching South Essex Playing Pitch and Built Facilities Strategies. (Sport England RPLP/824). 	The Council agrees that updating paragraphs 13.20 to 13.25 to reflect the now published Basildon and overarching South Essex Playing Pitch and Built Facilities Strategies provides clarification and the most up to date position.
Paragraph 13.24 Policy HC2: Strategic Approach to Leisure and Recreation	Other comment/s: Include reference to the Thames Estuary Path. (Essex County Council RPLP/1779). Modification/s requested: Change Paragraph 13.24 to include a reference to the Thames Estuary Path. (Essex County Council RPLP/1779).	The Council agrees that updating paragraph 13.24 to reference the Thames Estuary Path provides clarification and the most up to date position.
Policy HC2: Strategic Approach to Leisure and Recreation	 Support: Sport England support for policy HC2, as it promotes active and healthy lifestyles, and seeks to improve sport facility provision. (Sport England RPLP/825). 	Some amendments are sought in respect of this policy. Firstly, the Essex Bridleway Association seeks specific reference to horse riding and bridleways. Bridleways are a

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	 Support for the requirement for new residential developments to contribute towards sports facilities is welcomed. (Sport England RPLP/825). Support for the principle of sports facilities in the Green Belt welcomed. Evidence base for the policy (playing Pitch Assessment and Built facilities Assessment) is now robust, overcoming objections raised at Regulation 18. (Sport England RPLP/825). Generally support the principles in policy HC2. (Rochford District Council RPLP/1667). Sport England, the Lawn Tennis Association and Essex Tennis are supportive of proposals to re-provide an enhanced and enlarged tennis club at Billericay. (Billericay Tennis Club). Objection: Policy should reference horse-riders and disabled users in addition to walkers and cyclists. (Essex Bridleway Association RPLP/367). Noted that Gloucester Park as a whole was not identified as a Local Green Space, but queries whether a smaller area of the park could be designated as such. Since 2010, there has been a loss of open space as shown in the 2015 Open Space Assessment Gap Analysis. This is contrary to the proposals in the 2010 PPG17 Open Space Assessment. 	PROW, and this is already included in policy HC2. Therefore this amendment is not considered necessary. Secondly, a query in relation to Local Green Spaces is raised in respect of this policy. There is a specific policy on Local Green Spaces. However, for clarity, the Council is satisfied with the approach it has taken to identifying Local Green Spaces using a clear methodology that aligns to the criteria in the NPPF. Thirdly, an amendment is being sought providing more details as to the open space standards within policy HC2. These are included as an appendix, and therefore no amendment is considered necessary in this regard. Finally, a site promoter seeks for reference to be included in relation to SANG for the Essex Coast RAMS to address issues they are experiencing in relation to their site. However, the purpose of the RAMS, at least for Basildon, is to address residual impacts

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	 HC2 should set minimum open space standards for different types of open space. Other comment/s: 	to the Essex coast which cannot be addressed in the borough due to a lack of coastal environment, and the attractiveness of that environment from a
	 Parts 1b and 1c of the policy need amending to reflect the PPS and BFS, which recommend using demand generation arising from development rather than set standards. (Sport England RPLP/825). 	recreation perspective. No amendment to policy HC2 is therefore supported by the Council in respect of this representation.
	The emerging evidence for the JSP may affect the strategic approach in policy HC2, in particular the Green and Blue Infrastructure Study, and the PPS/BFS. (Rochford District Council RPLP/1667). Notice and the PPS and the state of the strategic approach and the PPS/BFS.	
	 Neither policy H19 or HC2 address how the quantum of open space provided above that required to off-set the impacts of H19 will be delivered. This amounts to 6.5ha. Reference to SANG in association with the RAMS may overcome this. (Commercial Estates Group RPLP/2256). 	
	 Modification/s requested: Amend policy HC2 to reference horse-riders and disabled users in addition to walkers and cyclists. (Essex Bridleway Association RPLP/367). 	
	 The South West of Gloucester Park should be added to the list of Local Green Spaces in policy HC6. Viable limits should be set that can be adhered to in existing urban areas and in new developments. The policy HC2 should 	

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	 state minimum amounts of different types of public open space per 1000 residents. It should also define minimum distances for all residents to urban parks, recreational grounds and children's play areas. To address this objection, it is requested that references to local standards in paragraphs 1(b) and 1(c) are removed and replaced by the approach set out in the Playing Pitch Strategy for playing pitch provision are Built Facilities Strategy for indoor sports provision as appropriate. This would allow the policy to be consistent with the evidence base as well as Government policy. (Sport England RPLP/825). Suggested wording changes to policy HC2. (Commercial Estates Group RPLP/2256). 	
Paragraph 13.28 Policy HC3: Strategic Approach to Education, Skills and Learning	 Other comment/s: List of education facilities should be expanded to include provision for Special Education Needs. (Essex County Council RPLP/1780). Modification/s requested: Suggested wording changes to paragraph 13.28. (Essex County Council RPLP/1780). 	The Council supports the suggested wording changes to paragraph 13.28 as a point of clarification.
Paragraphs 13.29 - 13.33 Policy HC3:	Objection:	ECC seek changes to paragraph 13.29 to ensure SEN provision is covered these changes are supported by the Council.

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Strategic Approach to Education, Skills and Learning	 Paragraph 13.29 is not justified. Basildon schools have not raised their standard and the number of homes in Billericay will give rise to 6,000 children. Other comment/s: Acknowledge the reference to schools, however request an amendment to include specific reference to Special Education Needs within the wider provision of schools. (Essex County Council RPLP/1782). Reference to status of secondary schools should be updated as all schools are now good or outstanding. (Essex County Council RPLP/1782). Modification/s requested: Change paragraph 13.29 to clarify and include reference to the provision of Special Education Needs. (Essex County Council RPLP/1782). Suggested wording changes to paragraph 13.29. (Essex County Council RPLP/1788). Review estimations for education needs. 	Queries have however been raised with regard to the methodology for assessing educational needs generally by residents, primarily of Billericay. The education requirement has been calculated by the County Council using a methodology which has been applied county wide, and has been subject to Local Plan examinations. The projections of school demand are justified. Evidence in respect of improvements at Basildon secondary schools can be found on the OFSTED website.
Policy HC3: Strategic Approach to Education, Skills and Learning	 Support: The Council generally supports the principles set out in draft Policy HC3. (Rochford District Council RPLP/1668). Support for the requirement of part 2e of policy HC3 as recognises the importance of sport facilities on education sites 	A representation has been received requesting a secondary school be allocated at Dunton to the west of the Borough. The decision in Dec 2017 and Mar 2018, and not changed since, means that there is insufficient new pupil

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	for meeting the community sport facilities need. (Sport England RPLP/826). General support for the principles set out in policy HC3. (Croudace Homes RPLP/1893). Objection:	product in this location to justify the need for a new secondary school in this location. This view is shared by the Education Authority. Countryside Properties have raised the issue that many of the allocation sites.
	 Policy HC3 should be modified so the policy refers to the Bowers Gifford and North Benfleet housing allocations and the need for a 2FE primary school. (Bowers Gifford and North Benfleet Parish Council RPLP/3695). Most of the housing allocations are not required to make on site school provision. Policy HC3 should be amended to reflect this fact. (Countryside Properties (UK) Ltd RPLP/1331 and RPLP/1362). The need for a secondary school is not at east Basildon, but at West Basildon. Many children travel out of west Basildon to go to secondary school, resulting in the need to travel. Billericay Secondary schools are over-subscribed, and yet no new provision is proposed in the Local Plan to accommodate growth. 	issue that many of the allocation sites are not required to make on-site school provision, and the policy could be clarified in this respect. The Council supports an amendment in this respect which it is agreed would add clarity. Bowers Gifford and North Benfleet Parish Council have highlighted the need for a new primary school in their area to support their housing allocation of 1,350 homes. It is agreed by the Council that policy H3 could be amended to provide clarity in this regard.
	Other comment/s: • Croudace are working with ECC to secure additional primary and early years provision in Noak Bridge. (Croudace Homes RPLP/1893).	

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	 Modification/s requested: Suggested wording changes to policy HC3. (Countryside Properties (UK) Ltd RPLP/1331 and RPLP/1362). Modify the wording of the strategic policy in both HC2 and HC3 to refer to the obligations of policies SD2 and SD3 in respect of the Bowers Gifford & North Benfleet Neighbourhood Plan housing allocation. (Bowers Gifford and North Benfleet Parish Council RPLP/3695). The Local Plan should allocate a site for a new secondary school at Dunton, policy H8. 	
Policy HC4: Community Facilities	 Support: Sport England support policy HC4 as it seeks to retain and enhance community facilities consistent with the NPPF. (Sport England RPLP/627). Objection: Policy HC4 would restrict the education authority in enhancing school provision through relocation or disposal of obsolete assets. (Essex County Council RPLP/1785). 	The Borough Council is of the view that it will be for the education authority to have a clear plan in place which demonstrates that an existing asset is no longer required. This is justified in order to ensure community assets are retained where necessary for community use, with disposal acceptable where a community requirement does not exist.
	Modification/s requested: Clarification and changes are required to either exclude schools redevelopment of educational establishments identified on the Policies map to be permitted where they are surplus to education requirements. (Essex County Council RPLP/1785).	

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 Support: General support the principles in policy HC5. (Rochford District Council RPLP/1669). 	There are some amendments sought with regard to policy HC5.
Objection: • Policy should specify that open space has to be replaced with equivalent or better facilities in terms of quantity and quality.	Sport England seek amendments which would align the policy better with national policy. The Council supports such amendments.
 Remove land at Linda Gardens from the schedule of pubic open spaces, as it is private land and the land owner has no intention of providing this site for public open space. This position has been recognised by an Inspector on Appeal. The landowner is seeking for this site to be removed from the current extent of the Green Belt and allocated for housing purposes. (Millwood Designer Homes Ltd RPLP/1826). 	The landowner for Linda Gardens has indicated that the land at this site is in private ownership and not available for public open space provision. Given this allocation is not deliverable, it is agreed by the Council that this allocation should be amended.
 The whole of Kent View Recreation Ground should be designated a Local Green Space. Other comment/s: The supporting text should reference the new Playing Pitch strategy. (Sport England RPLP/828). The emerging evidence for the JSP may affect the strategic approach in policy HC2, in particular the Green and Blue Infrastructure Study, and the PPS/BFS. (Rochford District Council RPLP/1669). 	Residents living in proximity to Kent View recreation ground have suggested that all of that site should be designated a Local Green Space. The Council agrees that the designation should be amended in part to reflect the Field in Trust designation. This was made after the Local Green Space designation was identified through evidence base work, and therefore this amendment is
	 Support: General support the principles in policy HC5. (Rochford District Council RPLP/1669). Objection: Policy should specify that open space has to be replaced with equivalent or better facilities in terms of quantity and quality. (Sport England RPLP/828). Remove land at Linda Gardens from the schedule of pubic open spaces, as it is private land and the land owner has no intention of providing this site for public open space. This position has been recognised by an Inspector on Appeal. The landowner is seeking for this site to be removed from the current extent of the Green Belt and allocated for housing purposes. (Millwood Designer Homes Ltd RPLP/1826). The whole of Kent View Recreation Ground should be designated a Local Green Space. Other comment/s: The supporting text should reference the new Playing Pitch strategy. (Sport England RPLP/828). The emerging evidence for the JSP may affect the strategic approach in policy HC2, in particular the Green and Blue Infrastructure Study, and the PPS/BFS. (Rochford District

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	 Modification/s requested: Suggesting wording changes to policy HC5 and supporting text. (Sport England RPLP/828). Remove land at Linda Gardens from the schedule of pubic open spaces, as it is private land and the land owner has no intention of providing this site for public open space. This position has been recognised by an Inspector on Appeal. The landowner is seeking for this site to be removed from the current extent of the Green Belt and allocated for housing purposes. (Millwood Designer Homes Ltd RPLP/1826). Amend the two areas within LGS50 Kent View Recreation ground from HC5 to HC6. 	
Policy HC6: Local Green Spaces	 Objection: Noted that Gloucester Park as a whole was not identified as a Local Green Space, but queries whether a smaller area of the park could be designated as such. Since 2010, there has been a loss of open space as shown in the 2015 Open Space Assessment Gap Analysis. This is contrary to the proposals in the 2010 PPG17 Open Space Assessment. Does not agree that the area of Natural and Semi natural open space increased between 2010 and 2015. The whole of Kent View Recreation Ground should be designated a Local Green Space. The threshold of 20ha for Local Green Spaces is arbitrary. 	There are objections primarily in relation to the approach taken to the identification of Local Green Spaces. These were suggested to the Council by residents as part of the Draft Local Plan consultation, and a specific assessment with a clear methodology was used to assess each site against the criteria set out in the NPPF. This included a limit on site size, to reflect that Local Green Spaces cannot be swathes of land, which was cross-checked with the approach taken in other areas to establish reasonable practice.

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	 Noted that Gloucester Park as a whole was not identified as a Local Green Space, but queries whether a smaller area of the park could be designated as such. Concerned that Northlands Park was excluded from designation as a Local Green Space due to its size, especially due to there being development parcels around its edge. South Green provides a recreation function and should be considered a local Green Space. It is also designated a Village Green. 	It is noted that queries have arisen with regard to the extent of the designation at the Kent View Recreation Ground. It is agreed that this designation should be amended to reflect the Fields in Trust designation which took place after the assessment work was complete.
	 Modification/s requested: The South West of Gloucester Park should be added to the list of Local Green Spaces in policy HC6. For policy HC6, add Northlands Park LGS39 as Local Green Space Include the complete area of Kent View Road Recreation ground as Local Green Space LGS50. Amend the two areas within LGS50 Kent View Recreation ground from HC5 to HC6. South Green provides a recreation function and should be considered a local Green Space. It is also designated a Village Green. 	It is noted that queries have also been raised with regard to the assessment of South Green. The Council is satisfied with its assessment which is in accordance with a consistent methodology applied borough wide. It should also be noted that as a Village Green, this land is already protected from development and would not benefit from additional protection offered by a Local Green Space designation.
Policy HC7: Allotment Gardens	Objection: • There is an under-provision of allotments in Billericay that should be addressed through specific requirements within site allocations in the town.	The Open Space Appraisal does not recommend the allocation of new allotment sites and this amendment

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	Modification/s requested: • Allocations of new allotments should be included on the policies map.	would not therefore be justified by evidence.
Policy HC8: Playing Fields Associated with Education Facilities	 Objection: The requirement to retain old playing fields potentially renders the relocation of a school unviable. (Essex County Council RPLP/1786). The Local Plan does not take into account the implications of the Lower Thames Crossing on transport and social infrastructure or air quality in Basildon Borough. Other comment/s: There is a need to cross-check the list of education facilities with the Playing Pitch Strategy. (Sport England RPLP/830). The policy map should be amended to show the changed extent of the playing field at Beauchamps School if part of the playing field is disposed of. (Sport England RPLP/830). Paragraph 13.71 should be amended to refer to legislation rather than Sports England. (Sport England RPLP/830). Modification/s requested: There is a need to cross-check the list of education facilities with the Playing Pitch Strategy. (Sport England RPLP/830). 	A representation has been made in relation to this policy regarding the implications of the Lower Thames Crossing. The proposals for the Lower Thames Crossing do not at this time directly impact on Basildon Borough as the proposed routing is to the south and west of the borough. The proposals are still in development and have not been subject to full assessment. Therefore, it cannot be known as to what their local impacts will be. The local plan has been prepared using reasonable assumptions and a proportionate evidence base. In relation to this policy itself, it is generally supported subject to some minor modifications by Sport England. The Council is satisfied with the modifications proposed, and supports them.

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	 The policy map should be amended to show the changed extent of the playing field at Beauchamps School if part of the playing field is disposed of. (Sport England RPLP/830). Paragraph 13.71 should be amended to refer to legislation rather than Sports England. (Sport England RPLP/830). Delete policy HC8. (Essex County Council RPLP/1786). 	However, ECC object to this policy as it affects their assets and would wish for it to be deleted. The Council, having regard to the Basildon Playing Pitch Strategy, believes that school playing fields are an important component of the playing pitch provision in Basildon and the deletion of this policy would therefore put at risk of the provision of such facilities. It does not therefore support the deletion of this policy. It does however believe that there is scope for an amendment to this policy which could support the loss of a playing field where a relocation occurs which provides the same or better playing pitch provision.
Policy HC9: Private Open Spaces - Conditional Access	 Objection: No reference to old or new evidence in the supporting text to justify policy. (Sport England RPLP/831). Barleylands is an important location for sports provision, including for sports such as archery. The lack of facilities at this location is a challenge for this wider sports provision. Modification/s requested: 	Sport England have sought for the new evidence base to be referenced in this policy's supporting text. This amendment is supported for clarification purposes. A representation has also been made on behalf of an archery club operating out of Barleylands with regard to its role, and the lack of facilities for sports given the

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	 Suggested wording changes to policy HC9 and supporting text. (Sport England RPLP/831). Barleylands should be identified as a Private Sports facility. 	role it fulfils. The issue is noted by the Council. In November 2018, the Council agreed the Basildon and South Essex PPS and BFS. A priority action agreed at that time was to enter into discussions with Barleylands about securing sport pitch provision in this location. This is ongoing, and will hopefully result in the Council being able to identify specific sport provision with secured tenures in this location. However, it would not be appropriate to identify the whole Barleylands complex for such a purpose, so this ongoing work is essential to reach a reasonable position.
Policy HC10: New and Enhanced Community Facilities	 Objection: Conflict between uses such as schools and the requirement for no unacceptable impacts on amenity are unrealistic, especially at the start and end of the school day. (Essex County Council RPLP/1788). No reference to old or new evidence in the supporting text to justify policy. (Sport England RPLP/832). Modification/s requested: Suggested wording changes to policy HC9 and supporting text. (Sport England RPLP/832). 	Sport England have sought for the new evidence base to be referenced in this policy's supporting text. This amendment is supported for clarification purposes. ECC believe that this policy restricts the development of schools. It is considered by the Council that all developments, including schools, should be well planned and designed to be 'good

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Section/Para/ Policy	Summary of Responses	Council's response
	Change policy HC10 by excluding schools of this policy. (Essex County Council RPLP/1788).	neighbours'. The Council does not therefore support this amendment.
Policy HC11: Loss of Community Facilities and Policy HC12: Loss of Open Space	 Objection: No reference to old or new evidence in the supporting text to justify policy. (Sport England RPLP/833). Other comment/s: Requirement that preference be given to other community uses prior to other uses are considered will make school relocations unviable. (Essex County Council RPLP/1769). Modification/s requested: Suggested wording changes to policy HC11 and supporting text. (Sport England RPLP/833). Change policy HC11 by excluding schools of this policy. (Essex County Council RPLP/1769). 	Sport England seek specific reference to the PPS and BFS in the supporting text of this policy. This is a generic policy, and it does not seem appropriate to include this referencing in this instance. ECC meanwhile seek for school provision to be deleted from this policy. The Council however feels that it will be for the education authority to have a clear plan in place which demonstrates that the existing asset is no longer required. This is justified in ensuring community assets are retained and reused where necessary. Disposal can occur if there is no reasonable alternative community use.
Policy HC12: Loss of Open Space	 Objection: No reference to old or new evidence in the supporting text to justify policy. (Sport England RPLP/834). Modification/s requested: Suggested wording changes to policy HC12 and supporting text. (Sport England RPLP/834). 	Sport England seek specific reference to the PPS and BFS in the supporting text of this policy. This is a generic policy, and it does not seem appropriate to include this referencing in this instance.

Section/Para/ Policy	Summary of Responses	Council's response
Chapter 14: Prote	cting Green Belt Land	
Chapter 14: Protecting Green Belt Land	 Support: Support further release of Green Belt to meet housing needs and deal with affordability concerns. (Brentwood Roman Catholic Diocese Trustee RPLP/1904). Objection: Does not support the evidence base in relation to development of the Green Belt. (Brentwood Roman Catholic Diocese Trustee RPLP/1904). Other comment/s: Promotion of site Land at Foots Farm, Billericay. (Brentwood Roman Catholic Diocese Trustee RPLP/1904). Modification/s requested: Allocate land a Foots Farm, Billericay. (Brentwood Roman Catholic Diocese Trustee RPLP/1904). 	The Land at Foots Farm, Billericay has been tested for accommodating housing development through the local plan preparation process, but was discounted. The final selection of housing sites allocated within the Revised Publication Local Plan have been informed by an extensive evidence base, including the Housing Options Topic Paper. The Housing Options Topic Paper draws together evidence related to housing capacity and constraints on growth, and gives an explanation on how the Council has considered all the housing site options, using the extensive evidence base available to inform their decisions.
Paragraph 14.10 Policy GB1: Strategic Approach to	Objection: Objects to developing on Green Belt land in Billericay. Does not support the evidence base in relation to development of the Green Belt.	The Council has a substantial evidence base in relation to Green Belt matters, which has been reviewed by both PAS and legal Counsel to ensure its robustness.

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Green Belt Protection		
Paragraph 14.12 Policy GB1: Strategic Approach to Green Belt Protection	 Objects to the wording in policy GB1 in relation to the release of Green Belt for neighbourhood planning. (Bowers Gifford and North Benfleet Parish Council RPLP/3699). Objects to wording in paragraph 14.12 as it conflicts with Government legislation to preserve the Green Belt. Modification/s requested: Amend policy GB1 to reference the provision enabling the Bowers Gifford & North Benfleet Neighbourhood Plan to bring forward proposals for detailed amendments to Green Belt boundaries. (Bowers Gifford and North Benfleet Parish Council RPLP/3699). 	The Council is of the view that sufficient flexibility and detail in relation to Neighbourhood Plans and Green Belt has been set out in policy GB1 and in the NPPF.
Policy GB1: Strategic Approach to Green Belt Protection	 Supports GB1 supporting text. (Essex Bridleways Association RPLP/368). Objection: Objects to the Dale Farm site not being proposed for development in the Local Plan. (Land Group (Billericay) Ltd RPLP/1442). Objects to the OAN not being met through further release of suitable Green Belt land that does not meet the purposes. 	Green Belt is an emotive subject within Basildon Borough, with some site promoters seeking additional allocations, whilst many residents wish to see less or no Green Belt release. A Green Belt Review has been prepared which examines the contribution each area of the Green Belt makes to the purposes of including land within it. This has been subject to review by PAS and legal Counsel to ensure its robustness. A

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	 (Dale Farm Residents Group RPLP/3231, The Gypsy Council RPLP/3233). Objects to developing on Green Belt land. Objects to developing on Green Belt land in Billericay. Does not support the evidence base in relation to development of the Green Belt. No requirement in national policy to build on green belt. Houses on Potash Road site will link Billericay directly to Chelmsford borough boundary. Concern there will be further loss of Green Belt through Neighbourhood Plans. Does not think the Council have worked with neighbouring authorities to identify alternative land for development than the Borough's Green Belt. Urban and brownfield sites should be built on before Green Belt land. No exceptional circumstances given for loss of Green Belt. The plan will negatively impact on the character of Billericay. Strategic Objective 2 relating to the protection of the Green Belt is not being met. Basildon has better access to facilities such as cinema, swimming pool, hospital and police compared to Billericay residents. Development will impact wildlife habitat. Development will cause pollution. Development will result in loss of character to Billericay. 	separate Green Belt Topic Paper has then been prepared which examines the need for development in the Green Belt against the 'Calverton Tests' and the new tests in the NPPF, to determine if exceptional circumstances exist. This includes a review of each potential strategic allocation to examine the harm that may arise. The Council is therefore satisfied that the need for development in the Green Belt to meet housing needs has been established and that harm has been minimise as far as is practical. This means that some sites have not been allocated as the harm to the Green Belt is considered to outweigh the benefits of development, having regard to a suite of evidence for each site. However, it also means that some land within the current extent of the Green Belt will be lost. It should be noted that in Basildon and Wickford the Green Belt has not been reviewed since the Adopted 1998 plan was prepared. In Billericay, the Green Belt has not been reviewed since the Billericay District Plan of 1989 was prepared.

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	 Housing built in Billericay will not be affordable. Excessive number of homes for Billericay. The OAN is a prediction not a fact. Previous consultation comments were not taken into account through the Local Plan process. Concerned about loss of agricultural land. The Council should develop brownfield land first. Objects to the increased housing need. Objects to additional development as it will lead to more congestion. Concerned that loss of Green Belt will impact on health and wellbeing. Supporting infrastructure needs have not been sufficiently considered. Alternative site options have not been fully considered. New national evidence shows there has been a reduction in the need for housing. Objects to change of housing allocation site numbers throughout the Local Plan process. Other comment/s: Suggests additional reference to the Green Belt 'exceptional circumstances' assessment criteria within the NPPF (Paragraph 137). (Rochford District Council RPLP/1670). 	There is a suggestion that no development should occur in the Green Belt until the capacity in the urban area is exhausted. This would not boost the supply of housing, as required by the NPPF, with a mix of sites in the existing urban area and on Greenfield sites needed to achieve a higher and more consistent rate of delivery.

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	 Would like further clarification within policy GB1 part 4 of the importance of Green Belt for its users and the need to improve accessibility. (Essex Bridleways Association RPLP/368). Notes that proposed CIL rate is higher in Billericay than anywhere else. Modification/s requested: 	
	 Amend policy GB1 to include reference to criteria in paragraph 137 of the NPPF. (Rochford District Council RPLP/1670). It should be possible to build on Green Belt land until the OAN is met. (Dale Farm Residents Group RPLP/3231, The Gypsy Council RPLP/3233). 	
	 Developer is promoting Land at Dale Farm, Wickford for housing development. (Land Group (Billericay) Ltd RPLP/1442). Reduce amount of Green Belt land removed for development. 	
	 Needdce amount of Green Belt land removed for development. Do not build on Green Belt land. Build on brownfield sites and urban land before Green Belt. Additional site options should be considered. Justification needs to be provided to support why the sites have been chosen in the Green Belt. 	
Paragraph 14.27 Policy GB2: Green Belt Extent	Objection: Objects to developing on Green Belt land in Billericay. Development will impact wildlife habitat. Development will cause pollution.	Objections to development in the Green Belt noted. The exceptional circumstances for this are explained above. The site selection process has used evidence including ecology

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		assessments and sustainable access assessments to ensure that the impacts arising from sites identified within the current extent of the Green Belt are minimised.
Policy GB2: Green Belt Extent	 Supports Supports the strategic approach to Green Belt protection. (AMS Care RPLP/2077). Supports allocation of Maitland Lodge (H21b) and removal of land from the Green Belt. (Inland Homes RPLP/2244). Supports release of necessary Green Belt to meet housing need where evidence supports the case. (Inland Homes RPLP/2244). Objection: Does not support the evidence base in relation to development of the Green Belt. (AMS Care RPLP/2077). Objects to the omission of New Site 6, land between London Road and A13, Pitsea. (AMS Care RPLP/2077). Objects to use of land at H21b for 20 self build properties as site could support more homes. (Inland Homes RPLP/2244). Objects to the OAN not being met through further release of suitable Green Belt land that does not meet the purposes. (Bellway Homes RPLP/2251). 	Green Belt is an emotive subject within Basildon Borough, with some site promoters seeking additional allocations, whilst many residents wish to see less or no Green Belt release. A Green Belt Review has been prepared which examines the contribution each area of the Green Belt makes to the purposes of including land within it. This has been subject to review by PAS and legal Counsel to ensure its robustness. A separate Green Belt Topic Paper has then been prepared which examines the need for development in the Green Belt against the 'Calverton Tests' and the new tests in the NPPF, to determine if exceptional circumstances exist. This includes a review of each potential strategic allocation to examine the harm that may arise.

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	 The full extent of H8 and the additional land west of Basildon should be allocated as a strategic site. (Bellway Homes RPLP/2251). Evidence base supports the release of parcel 66 and 67 of the Green Belt for development. (Bellway Homes RPLP/2251). Consideration to Brentwood's Local Plan should not overrule what is suitable in the Basildon Borough. (Bellway Homes RPLP/2251). Objects to the OAN not being met through further release of suitable Green Belt land that does not meet the purposes. (Dale Farm Residents Group RPLP/3234, The Gypsy Council RPLP/3235). Does not support any development to the North of Wash Road. (Cllr Allen RPLP/809). Objects to developing on Green Belt land. Objects to developing on Green Belt land in Billericay. Does not support the evidence base in relation to development of the Green Belt. Policy GB2 does not comply with paragraph 137 of the NPPF. Objects to the removal of Dunton Park from the Green Belt. Excessive number of homes for Billericay. No exceptional circumstances given for loss of Green Belt. Not enough Green Belt is being released to meet the housing need. Other comment/s: 	The Council is therefore satisfied that the need for development in the Green Belt to meet housing needs has been established and that harm has been minimise as far as is practical. This means that some sites have not been allocated as the harm to the Green Belt is considered to outweigh the benefits of development, having regard to a suite of evidence for each site. However, it also means that some land within the current extent of the Green Belt will be lost. It should be noted that in Basildon and Wickford the Green Belt has not been reviewed since the Adopted 1998 plan was prepared. In Billericay, the Green Belt has not been reviewed since the Billericay District Plan of 1989 was prepared. There are some concerns that the allocation of land within the Green Belt will result in wasteful land use. This has particularly been expressed in relation to allocation H21b, Land at Maitland Lodge.

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	It is essential to retain Green Belt boundaries that have been set out in the Local Plan. (Cllr Allen RPLP/809).	
	 Modification/s requested: Developer is promoting Land at Gifford House, Basildon (New Site 6) for housing development. (AMS Care RPLP/2077). H21b should be removed from this policy as this site is able to accommodate a higher number of general needs homes than 20 self build plots. (Inland Homes RPLP/2244). Developer is promoting larger extent of land at H8 - West Basildon, for housing development. (Bellway Homes RPLP/2251). It should be possible to build on Green Belt land until the OAN is met. (Dale Farm Residents Group RPLP/3234, The Gypsy Council RPLP/3235). Amend policy GB2 to comply with paragraph 137 of the NPPF. Do not remove the extent of Dunton Park form the Green Belt. Reduce housing targets. Maximum use should be made of available building land by maximising building density and demanding a much higher 	
	 proportion of social/affordable housing is provided. The provision of wasteful executive homes should not be encouraged. Remove Upper Park Road, Lower Park Road and Hovefields Avenue from the Green Belt to allow for development. 	

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	A new link road from Hovefields Avenue to Upper Park Road should be built.	
Paragraph 14.31 Policy GB3: New Development in the Green Belt	 Support: Support text in paragraph 14.31 for policy GB3. Other comment/s: Would like to see educational use included as a very special circumstance for development within the Green Belt. (Essex County Council RPLP/1792). Would like to see specific reference to the replacement tennis club and its enlargement included in the policy and shown on the policy map. Modification/s requested: Amend paragraph 14.31 to include educational use as a very special circumstance for development within the Green Belt. (Essex County Council RPLP/1792). Reference the replacement tennis club and enlargement in policy GB3 and show it on the policy map. 	Two amendments are proposed to this policy. The first is in relation to the replacement tennis club, with the request being for it to be referenced in this DM policy. It is considered this to be unnecessary as sufficient detail in relation to the replacement tennis club has been set out in policy H17. ECC would meanwhile like to see educational uses be included as a very special circumstance for development in the Green Belt. This would be inconsistent with the NPPF, and no evidence has been provided by ECC to justify that such circumstances exist at a borough wide scale. The Council cannot therefore support this amendment, and these would therefore need to be demonstrated on a case by case bases.
Policy GB3: New Development in the Green Belt	Support: • Support reference to very special circumstances with policy GB3. (Essex County Council RPLP/1793).	Green Belt is an emotive subject within Basildon Borough, with some site promoters seeking additional allocations, whilst many residents wish to see less or

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	 Objection: Objects to developing on Green Belt land in Billericay. Does not support the evidence base in relation to development of the Green Belt. Objects to development at H17d as it would risk urban sprawl between Billericay & Little Burstead. Objects to Relief Road as it is in violation of Green Belt purposes. 	no Green Belt release. A Green Belt Review has been prepared which examines the contribution each area of the Green Belt makes to the purposes of including land within it. This has been subject to review by PAS and legal Counsel to ensure its robustness. A separate Green Belt Topic Paper has then been prepared which examines the
	 Other comment/s: Would like to see educational use included as a very special circumstance for development within the Green Belt. (Essex County Council RPLP/1793). Green Belt land needs to be built on in order to meet the Borough's housing need. (Dale Farm Residents Group RPLP/3237, The Gypsy Council RPLP/3238). 	need for development in the Green Belt against the 'Calverton Tests' and the new tests in the NPPF, to determine if exceptional circumstances exist. This includes a review of each potential strategic allocation to examine the harm that may arise.
	 Modification/s requested: Amend policy GB3 to include educational use as a very special circumstance for development within the Green Belt. (Essex County Council RPLP/1793). It should be possible to build on Green Belt land until the OAN is met. (Dale Farm Residents Group RPLP/3237, The Gypsy Council RPLP/3238). Do not build on Green Belt land. 	The Council is therefore satisfied that the need for development in the Green Belt to meet housing needs has been established and that harm has been minimise as far as is practical. This means that some sites have not been allocated as the harm to the Green Belt is considered to outweigh the benefits of development, having regard to a suite of evidence for each site. However, it also

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		means that some land within the current extent of the Green Belt will be lost. It should be noted that in Basildon and Wickford the Green Belt has not been reviewed since the Adopted 1998 plan was prepared. In Billericay, the Green Belt has not been reviewed since the Billericay District Plan of 1989 was prepared.
		ECC would meanwhile like to see educational uses be included as a very special circumstance for development in the Green Belt. This would be inconsistent with the NPPF, and no evidence has been provided by ECC to justify that such circumstances exist at a borough wide scale. The Council cannot therefore support this amendment, and these would therefore need to be demonstrated on a case by case bases.
Paragraphs 14.32 – 14.40 Policy GB4: Green Belt	Objection: Objects to the approach taken in policy GB4 of excluding the HHNA and Fairmead plotlands for infill development. Modification/s requested:	The amendment was made following a request to the SPI Committee at its meeting of the 29 August 2018 by the Hovefield and Honiley Neighbourhood Forum. The Hovefield and Honiley High

Section/Para/ Policy	Summary of Responses	Council's response
Residential Infill Development	Do not exclude the HHNA and Fairmead plotlands for infill development through policy GB4.	Level Site Evaluation showed that low level development in this area would increase traffic but not be sufficient enough to warrant improving the network. This was considered sufficient evidence by the Committee to limit infill development in this location.
Policy GB4: Green Belt Residential Infill Development	Support: • Supports policy GB4: Green Belt Residential Infill Development. (Predominantly plotland land owners, Cllr Sargent RPLP741).	Whilst there is a good deal of support for this policy, there are also a number of objections primarily around the constraints within the policy.
	 Objects to the approach taken in policy GB4 of excluding the HHNA and Fairmead plotlands for infill development. (Hovefields and Honiley Neighbourhood Forum RPLP/1742). Objects to policy GB4 restricting infill to only residential buildings. (AMS Care RPLP/2079). Objects to the omission of site at Gifford House, London Road which has been identified to remain in the Green Belt. (AMS Care RPLP/2079). The plotland settlements should be included on the policies map as they were in the last consultation. The presence of existing properties and the presence of relevant vegetation within the plotland settlement itself should be detailed on the policies map. 	Firstly, some objections have resulted as the shift from the inclusion in the Draft Local Plan for a Plotlands infill policy to a Green Belt infill policy in the Revised Publication Local Plan. This resulted from comments to the Draft Local Plan which identified some sites just outside the identified plotland areas which could meet the policies requirements and were felt to be unfairly excluded. The Plotland Topic Paper (2017) considered this matter and it was concluded that the plotland areas are not required to define the extent of this policy. They are

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	 There should be a need to introduce appropriate landscaping within any submitted scheme under policy GB4. HHNA is not considered to have safe or sustainable means of access however policy H4 allocates Gypsy and Traveller provision. Policy GB4 goes beyond what is set out in the NPPF, including removing permitted development rights to which there is no lawful basis. Should only identify plotlands on the policies map and allow infilling there rather than anywhere in the Green Belt. Other comment/s: Modification/s requested: Do not exclude the HHNA and Fairmead plotlands for infill development through policy GB4. (Hovefields and Honiley Neighbourhood Forum RPLP/1742). Amend policy GB4 to include a mix of land uses including care accommodation and housing for older people. (AMS Care RPLP/2079). Suggested wording changes to policy GB4. Remove criteria which removes permitted development rights from policy GB4. 	therefore no longer identified on the policies map as they no longer have a specific policy relating to their plotland designations like within previous Local Plan version. Policy GB4 now applies to Green Belt Residential Infill rather than just plotland infill. Secondly, there were concerns that the Hovefield and Honiley and Fairmead Plotlands are excluded from this policy. The amendment was made following a request to the SPI Committee at its meeting of the 29 August 2018 by the Hovefield and Honiley Neighbourhood Forum. The Hovefield and Honiley High Level Site Evaluation showed that low level development in this area would increase traffic but not be sufficient enough to warrant improving the network. This was considered sufficient evidence by the Committee to limit infill development in this location. Thirdly, there is an objection to this policy on the basis that the exclusion of infill in Hovefield and Honiley is

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		enables the authorisation of existing unauthorised traveller pitches in order to meet some of the gypsy and traveller need in the borough. However, as these pitches are already existing, they would not increase traffic levels beyond those which already exist, so the evidence which has been used to restrict further infill in this location does not apply. Fourthly, it is considered that the policy should be extended to cover other uses beyond housing. Much erosion has occurred in the Green Belt as a consequence of other uses, which is a concern to the Council. Furthermore, the NPPF very much focuses on residential uses within the list of uses exceptionally permitted. It is therefore considered that the Council's focus on residential uses is consistent with the NPPF, and cognisant of local concerns.
		Finally, there is a suggestion that the policy should not indicate that permitted development rights may be removed. The Council is of the view, and has seen

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		on many sites, that an accumulation of ancillary buildings can erode the openness of the Green Belt to a greater degree than the original building alone. It is therefore appropriate when permitting infill development that this potential risk is recognised and managed through the removal of such rights.
Policy GB5: Extensions and Alterations to Buildings in the Green Belt	Objection: Does not support policy GB5 as it goes beyond the requirements of national policy.	This policy provides a local interpretation of national policy, and it is normal for a Local Plan in a Green Belt area to contain such a policy. The Council supports the retention of this policy which is considered consistent with national policy.
Policy GB6: Replacement Buildings in the Green Belt	Objection: Does not support policy GB6 as it goes beyond the requirements of national policy.	This policy provides a local interpretation of national policy, and it is normal for a Local Plan in a Green Belt area to contain such a policy. The Council supports the retention of this policy which is considered consistent with national policy.
Policy GB7: Change of Use of Buildings and	Objection: • Does not support policy GB7 as it goes beyond the requirements of national policy.	This policy provides a local interpretation of national policy, and it is normal for a Local Plan in a Green Belt area to

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Land in the Green Belt		contain such a policy. The Council supports the retention of this policy which is considered consistent with national policy.
Policy GB8: Ancillary Buildings and Structures in the Green Belt	 Objection: Does not support policy GB8 as it seeks to limit the potential of such buildings in the Green Belt beyond that permitted under the GPDO 2015. Objects to identified Gypsy and Travellers allocations of the two sites in Fobbing due to access issues and conflict with Green Belt policies. 	If such buildings are permitted under the GPDO then they do not require planning consent and the policy would not apply. However, the Council is of the view that when ancillary buildings do require planning consent their impact on the Green Belt should be minimised and that is the purpose of this policy. The objection to the proposed Gypsy and Traveller site recorded against this policy is addressed against policy H4.
Policy GB11: Positive Uses of Land in the Green Belt	 Support: Supports policy GB11: Positive uses of land within the Green Belt. (Sport England RPLP/835). Other comment/s: Reference to most up to date evidence base for sports should be included. (Sport England RPLP/835). Modification/s requested: 	It is agreed that reference to the most up to date evidence base for sports should be included in the supporting text to policy GB11.

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	Include reference to up to date evidence base for sports should be included. (Sport England RPLP/835).	
Chapter 15: Meeti	ng the Challenge of Climate Change and Flooding	
Paragraphs 15.5 – 15.11 Policy CC1: Responding to Climate Change	 Other comment/s: Update data on carbon dioxide emissions to reflect those published in June 2018. (Essex County Council RPLP/1794). Modification/s requested: Change Paragraphs 15.5 -15.11 to provide clarity based on the most up to date evidence; as set out in the UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2016 Published June 2018. (Essex County Council RPLP/1794). 	It is agreed that this modification should be made to ensure that the Local Plan reflects the most up to date evidence available.
Paragraph 15.14 Policy CC1: Responding to Climate Change	 Other comment/s: Should have reference to the revised Critical Drainage Areas, which have informed the Local Plan. The final report on the revisions will be published in 2019. (Essex County Council RPLP/1795). Modification/s requested: Change paragraph 15.14 to provide clarity and refer to the revised Critical Drainage Areas (2018). (Essex County Council RPLP/1795). 	It is agreed that this modification should be made to ensure that the Local Plan reflects the most up to date evidence available.

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Policy CC1: Responding to Climate Change	 Support: General support for the principles set out in draft policy CC1. (Rochford District Council RPLP/1671). Potential developer of site E6 supports the fabric first approach. (St Modwen Developments Ltd RPLP/2183). Potential developer of site E6 supports the objective of applying the Eco-industrial park principles within the A127 corridor. Although this could be a barrier to delivery if applied too rigidly. (St Modwen Developments Ltd RPLP/2183). Objection: LPAs can only set local standards for building performance where local evidence exists to justify. There is no local evidence and therefore the requirements of criterion e of policy CC1 should be deleted to comply with national policy. (Countryside Properties (UK) Ltd RPLP/1333, Gleeson Developments/Avant Homes RPLP/1363). Change policy CC1 to provide clarity on implementation and delivery. (Essex County Council RPLP/1796). The policy should require the submission of an energy statement for relevant applications which allows options for sustainable design to be discussed. (St Modwen Developments Ltd RPLP/2183). LPAs can only set local standards for building performance where local evidence exists to justify. There is no local evidence and therefore the requirements of criterion e of policy 	Various objections made in respect of this policy are in relation to the level of growth proposed and its impact on the environment in Basildon Borough. The Local Plan has been prepared in accordance with the policy requirements of the NPPF, and takes into account a substantial body of evidence including evidence related to the environment which has been used to direct development towards appropriate locations and influence the infrastructure requirements of the plan. The SA considers the plan to be appropriate. No amendments to the plan are therefore considered necessary in relation to these comments. A number of developers have questioned the appropriateness of the policy requirement for on-site renewable energy generation, and have sought for the requirement to be deleted. Justification for setting local requirements for renewable energy generation is set out in the Basildon Borough Renewable and Low Carbon

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	 CC1 should be deleted to comply with national policy. (Pigeon (Wickford) Ltd RPLP/2227). The policy is too prescriptive. (Pigeon (Wickford) Ltd RPLP/2227). The level of housing proposed in Billericay will increase pollution. The loss of Green Belt will affect the recycling of air. CC1 is a contradiction in the Local Plan, and should be at the forefront of the plan rather than housing. There has been no consideration of harm to the Countryside. London is not at capacity and should meet its own growth needs. Other comment/s: Policy would benefit from a third point stating the Council will seek to ensure all new development is sustainable, taking account the potential increased impacts of climate change on flood risk over a development's lifetime. (Environment Agency RPLP/618). The requirements of policy CC1 are likely to apply to allocation E6, and the flexibility is therefore welcomed. However, off-site solutions may jeopardise delivery in some instances. (St Modwen Developments Ltd RPLP/2183). Modification/s requested: 	Energy Constraints and Opportunities Assessment. The NPPF allows Local Planning Authorities at para 151 to put in place strategies for securing increased energy supply from renewable and decentralised sources, and para 153 expects planning applications to comply with any development plan policies on local requirements for decentralised energy supply, indicating that such policies can exist. It is appropriate for the plan to therefore include such a policy requirement. It is however agreed that policy CC1 and CC5 overlap, and the Council is therefore minded to recommend to the Inspector which improve clarity around the requirement for on-site renewables. Issues were also raised with how the policy deals with flood risk. The EA want further reference to flood risk in this policy, whilst St. Modwen suggested the overlap with policy CC2 is too great. The Council is of the view that the balance in relation to this matter is right, providing a basis for policy CC2 without repetition.

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	 Amend policy CC1 to advise that the Council will seek to ensure all new development is sustainable, taking account the potential increased impacts of climate change on flood risk over a development's lifetime. (Environment Agency RPLP/618). There should be a countrywide look at what we are doing to the climate within the context of house building and see what we are going to lose. Delete criterion (e) of Policy CC1. (Countryside Properties (UK) Ltd RPLP/1333, Gleeson Developments/Avant Homes RPLP/1363, Pigeon (Wickford) Ltd RPLP/2227). Change policy CC1 to provide clarity on implementation and delivery. (Essex County Council RPLP/1796). Suggested wording changes to part 1.e of policy CC1. (St Modwen Developments Ltd RPLP/2183). Delete part 2 of policy CC1 as it duplicates policy CC2 (Flood Risk and Drainage Management). (St Modwen Developments Ltd RPLP/2183). 	The Council does not therefore agree with either amendment suggested. Issues were also raised with regard to the scope of the policy. It is not within the scope of the Basildon Local Plan to take a countrywide look at the impacts on the climate of housebuilding. ECC also questioned the scope and sought for delivery elements to be incorporated into the policy, however Policy CC1 is a cross-cutting policy that primarily cross references all other relevant policies. Those policies contain the implementation components and therefore it is not appropriate to put such requirements in policy CC1.
Paragraph 15.18 Policy CC2: Flood Risk and Drainage Management	 Other comment/s: Include reference to Anglian Water as an example of another relevant authority. (Essex County Council RPLP/1797). Modification/s requested: Include reference to Anglian Water as an example of another relevant authority. (Essex County Council RPLP/1797). 	The Council supports this modification as it will improve the clarity of the Local Plan.

Section/Para/ Policy	Summary of Responses	Council's response
Paragraphs 15.20 – 15.23 Policy CC2: Flood Risk and Drainage Management	 Other comment/s: Should have reference to the most up to date evidence including the Revised Sustainable Drainage Systems Guide 2016, and the Revised Critical Drainage Areas 2018. (Essex County Council RPLP/1798). Modification/s requested: Reference to the most up to date evidence including the Revised Sustainable Drainage Systems Guide 2016, and the Revised Critical Drainage Areas 2018. (Essex County Council RPLP/1798). 	The Council supports the modification proposed as this will ensure that the Local Plan reflects the most up to date evidence available.
Paragraph 15.24 Policy CC2: Flood Risk and Drainage Management	Other comment/s: Paragraph 15.24 should be amended to acknowledge that Basildon Borough Council has acknowledged the SWMP. (Essex County Council RPLP/1799). Modification/s requested: Amend paragraph 15.24 to acknowledge that Basildon Borough Council has acknowledged the SWMP. (Essex County Council RPLP/1799).	The Council supports this modification as it provides clarity of the status of the SWMP at a local level.
Paragraph 15.25 Policy CC2: Flood Risk and Drainage Management	Other comment/s: • SWMP shows that the majority of Basildon Borough is not suitable for infiltration. Additional infiltration testing will be necessary as part of site design. (Essex County Council RPLP/1800).	The Council supports this modification as it will improve the clarity of the Local Plan.

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	 Modification/s requested: Amend paragraph 15.25 to clarify the need for further infiltration testing maybe necessary as part of detailed site design. (Essex County Council RPLP/1800). 	
Policy CC2: Flood Risk and Drainage Management	 Support: General support for the principles set out in draft policy CC2. (Rochford District Council RPLP/1672). Happy with the supporting text to this policy, including the reference to the TE2100 Plan and Riverside Strategies. (Environment Agency RPLP/2625). Welcomes reference to joint working on the creation of intertidal habitats. It is important to manage the impacts of tidal flood risk on wildlife receptors. (Environment Agency RPLP/2625). Welcomes reference to the protection of washlands as FRZ 3b. (Environment Agency RPLP/2625). Welcomes the clear undertaking to apply the sequential approach to the allocation of land for development. (Environment Agency RPLP/2625). Supports the requirement that developers are expected to fund flood risk mitigation or defences. (Environment Agency RPLP/2625). Objection: 	In terms of objections, the first point to be addressed is the suggestion that the Council's flood risk evidence is out of date. The SFRA was updated in 2018 to reflect changes to the EA's assumptions around severe rainfall events and climate change implications for tide levels. Separately the SWMP modelling was updated by ECC to firstly reflect the revised assumptions around severe rainfall events, but also to better capture drainage capacity. Early outputs from the SWMP modelling were reviewed by the Council in early 2018, and did not reveal any significant changes or issues for the Local Plan or the sites proposed for allocation, which cannot be appropriately managed. No amendment is therefore supported by the Council in respect of this matter, including any changes to site allocation.

Section/Para/ Policy	Summary of Responses	Council's response
	 Flood risk assessment evidence is out of date and should be updated. Flood risk management plans should be developed and the details of this included in policy CC2. The level of growth in Billericay will increase flood risk due to the capacity of the drainage network, which is not considered sufficient. This is contrary to the NPPF. There is a surface water drainage issue on Tye Common Road, which will get worse with climate change. Development at site H18 will increase flooding on Kennel Lane due to drainage problems in the area. Kennel Lane is narrow. Increased development at H18 will increase the potential for traffic incidents. Other comment/s: The Environment Agency look to work with Basildon, as a funding partner to deliver flood infrastructure improvements in Basildon Borough, especially as brownfield growth relies on this infrastructure. (Environment Agency RPLP/2625). Flood risk infrastructure should be included within CIL schedules. (Environment Agency RPLP/2625). Seeks an amendment to paragraph 15.22 to clarify the relationship between the infrastructure improvements needed to manage flood risk in the TE2100 Plan and the habitat creation requirements in the same plan. (Environment Agency RPLP/2625). 	In relation to modifications sought with regard to the policy itself, a resident has sought for detailed flood risk management plans to be set out in the policy. Policy CC2 is a strategic planning policy. It is not the purpose of policy CC2 or indeed the Local Plan to set out details of flood risk management plans. This is for the LLFA to set out in the Surface Water Management Plan, and for the EA to set out in their Flood Risk Management Plans. These are referenced in the supporting text and content of policy CC2 and that is considered sufficient. It also provides flexibility required by the NPPF by allowing those plans to be updated separate to the plan-making process. The Environment Agency support policy CC2, but seek for some amendments to be made to the supporting text to improve its clarity. The Council is supportive of these amendments.

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	 Seek additional information be added to the evidence base detailing the specific projects and costs of those projects arising from the TE2100 Plan. (Environment Agency RPLP/2625). Modification/s requested: Amend paragraph 15.22 to clarify the relationship between the infrastructure improvements needed to manage flood risk in the TE2100 Plan and the habitat creation requirements in the same plan. (Environment Agency RPLP/2625). Add additional information to the evidence base detailing the specific projects and costs of those projects arising from the TE2100 Plan. (Environment Agency RPLP/2625). Amend policy CC2 to provide more detail of surface water drainage and flood management measures. Invest in drainage before giving permission to build additional homes. Do not develop on Tye Common Road as it will increase surface water drainage issues. Drainage should not be via Kennel Lane Access to the additional houses should not via Kennel Lane. 	Specific amendments have been sought with regard to site H18 off Kennel Lane. The plan should be read as a whole. The requirements of policies CC4 and T7 will ensure drainage and access issues are appropriately addressed at the planning application stage when design details are available. The Council does not support the specific amendments sought in relation to this site.
Policy CC3: Washlands	Support:Support for the recognition of the engineered washlands as Flood Risk Zone 3b.Objection:	An objector to site H10 has made an objection to this policy on the basis of flood risk affecting that site. The allocation H10 however avoids the principle areas at risk of flooding.

Section/Para/ Policy	Summary of Responses	Council's response
	 Policy H10 does not conform to NPPF 2018 paragraph 155 which requires areas of flood risk to be avoided. Development on this site may be affected by flood risk, and may cause flood risk downstream also. Policy H10 fails paragraph 156 because it does not mention the flood risk in this area which is covered in the Strategic Flood Risk Assessment. Modification/s requested: The site of policy H10 should be assessed as too high a risk for flooding and removed from the Local Plan. 	Paragraph 11.95 highlights the risk of flooding in this location and highlights the need for conformity with policy CC4. Parts 1, 7 and 8 of Policy H10 allow for flood risk issues in this location to be adequately dealt with. No amendments to the Local Plan or allocation H10 are therefore considered necessary in respect of this representation.
Policy CC4: Managing Flood Risk in New Development	 Support: Support for the policy and its supporting text and justification. Objection: The site to the north of Wash Road is sequentially preferable (in flood risk terms) to the allocation H10 nearby. The allocation of H10 over the site to the north of Wash Road is therefore contrary to the NPPF, and has the potential to undermine policy CC4. (Southern and Regional Development Ltd RPLP/2096). Other comment/s: Support for the requirement for all development proposals including the redevelopment of existing buildings to incorporate SUDS. (Anglian Water Services Ltd RPLP/2133). 	The promoters of land to the North of Wash Road have highlighted that in flood risk terms their site is sequentially preferable to the allocation H10. The full range of evidence affecting each potential site has been considered through the Council's Committee processes, and a judgement has been made by the Committee weighing up this evidence. No modification to the Local Plan is therefore supported by the Council at this time in respect of this representation.

Section/Para/ Policy	Summary of Responses	Council's response
	 Amendment to policy CC4 and its supporting text is sought by the drainage undertaker to ensure the policy also covers the capacity of the foul sewerage network and flooding from sewers. (Anglian Water Services Ltd RPLP/2133). Modification/s requested: Re-assess the site to the north of Wash Road as it is sequentially preferable (in flood risk terms) to the allocation H10 nearby. (Southern and Regional Development Ltd RPLP/2096). Suggested wording changes to policy CC4. (Anglian Water Services Ltd RPLP/2133). 	Anglian Water sought an amendment to this policy to capture flooding from sewers. As this intention of this policy is to reduce the risk of flooding from all sources, this proposed amendment is supported by the Council.
Policy CC5: Sustainable Buildings – New Builds	 Support: Flexibility provided in policy CC5 is welcomed. (St Modwen Developments Ltd RPLP/2184). Objection: Conflicting requirements in policy CC1 and CC5 regarding energy emission requirements. (Countryside Properties (UK) Ltd RPLP/1334). Policy requirement 1b appears to set an unspecified addition requirement for energy performance over and above the requirements of the building regulations. There is no evidence or justification for such a requirement, and this part of policy CC5 should be deleted. (Countryside Properties (UK) Ltd 	A number of developers have questioned the appropriateness of the policy requirement for on-site renewable energy generation, and have sought for the requirement to be deleted. Justification for setting local requirements for renewable energy generation is set out in the Basildon Borough Renewable and Low Carbon Energy Constraints and Opportunities Assessment. The NPPF allows Local Planning Authorities at para 151 to put in place strategies for securing increased energy supply from renewable and

Section/Para/ Policy	Summary of Responses	Council's response
	 RPLP/1334, Gleeson Developments/Avant Homes RPLP/1364). There is no merit in having a policy that requires buildings to meet the building regulations as this is covered by other legislation. (Countryside Properties (UK) Ltd RPLP/1334, Gleeson Developments/Avant Homes RPLP/1364). The policy should not be applied so rigidly to sterilise development. (St Modwen Developments Ltd RPLP/2184). Conflicting requirements in policy CC1 and CC5 regarding energy emission requirements. (Pigeon (Wickford) Ltd RPLP/2227). Policy requirement 1b appears to set an unspecified addition requirement for energy performance over and above the requirements of the building regulations. There is no evidence or justification for such a requirement, and this part of policy CC5 should be deleted. (Pigeon (Wickford) Ltd RPLP/2227). There is no merit in having a policy that requires buildings to meet the building regulations as this is covered by other legislation. (Pigeon (Wickford) Ltd RPLP/2227). The energy efficiency requirements of the plan are insufficient to achieve the target in the Climate Change Act 2008 of delivering Zero Carbon Buildings from 2020. If energy efficiency measures are not incorporated into new buildings now, retrospect measures such as the construction of solar and wind farms in the Green Belt will occur, which will be more harmful to the environment. 	decentralised sources, and para 153 expects planning applications to comply with any development plan policies on local requirements for decentralised energy supply, indicating that such policies can exist. It is appropriate for the plan to therefore include such a policy requirement. It is however agreed that policy CC1 and CC5 overlap, and the Council is therefore minded to recommend to the Inspector which improve clarity around the requirement for on-site renewables. Separately a resident suggested we should set our own energy efficiency standards and produce local guidance on this. The NPPF is clear that the energy efficiency standards in the Building Regulations should be used, and that local standards should not be set. Therefore, this amendment to the Local Plan cannot be supported by the Council. It is recognised that this does not go far enough for some residents who would like to see high levels of energy efficiency in new builds and for

Section/Para/ Policy	Summary of Responses	Council's response
	 Other comment/s: There is scope to combine elements of policy CC1 and CC5. (St Modwen Developments Ltd RPLP/2184). Modification/s requested: Criterion 1(b) of Policy CC5 should be deleted. (Countryside Properties (UK) Ltd RPLP/1334, Gleeson Developments/Avant Homes RPLP/1364). Delete criterion 1.b) of Policy CC5. (Pigeon (Wickford) Ltd RPLP/2227). A separate policy document should be produced for energy standards in residential homes. 	the Council to avoid the need for solar farms/wind farms in the Green Belt.
Chapter 16: Cons	erving and Enhancing the Natural Environment	
Chapter 16: Conserving and Enhancing the Natural Environment	 Objection: The plan is not underpinned by evidence regarding the habitat and wildlife impacts it will have, including impacts from children, pets and pollution in proximity. It is not clear how impacts on wildlife will be measures in order to achieve a net gain. It does not make provision for common species, focusing instead on priority species and designations only. The proposals in the RAMS should be replicated at a local level to manage recreational disturbance. 	The Local Plan is supported by an evidence base which includes a Sustainability Appraisal and site level ecology assessments for each allocation. A monitoring framework has been developed to measure the impacts of the Local Plan. This was used for the AMR in 2016/17 and 2017/18.

Section/Para/ Policy	Summary of Responses	Council's response
		The RAMS responds to legal requirements under the Habitat Regulations. Natural England has not specified a requirement for a similar approach to dealing with local sites. That being said, the SPI Committee agreed to look at a similar strategy to the RAMS for local SSSIs at its meeting in February 2019. This will be pursued in due course.
Paragraph 16.8 Policy NE1: Green Infrastructure Strategy	 Other comment/s: Reference to any biodiversity net gains (and losses) to be measurable. (Essex County Council RPLP/1801). Modification/s requested: Amend paragraph 16.8 to clarify that changes in biodiversity net gains need to be measurable. (Essex County Council RPLP/1801). 	The Council agrees that this amendment will improve the clarity of the plan in terms of what is expected regarding Biodiversity Net Gain.
Policy NE1: Green Infrastructure Strategy	 Support: Pleased that the new requirements, with regard to Appropriate Assessments, under the Habitats Regulations as a result of the 'People over wind' case have been considered and acted upon where necessary. (Environment Agency RPLP/814). Pleased the needs of wildlife are also considered as part of the climate change chapter. (Environment Agency RPLP/814). 	This policy is widely supported, including by statutory bodies and nature conservation bodies, however a resident has indicated that the proposals elsewhere in the plan do not comply with its requirements. The site allocations in the plan have been informed by evidence regarding potential environmental impacts and it is

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Section/Para/ Policy	Summary of Responses	Council's response
	 Pleased that blue infrastructure has been included within Strategic Objective 1. (Environment Agency RPLP/814). Supportive of the point in policy NE1 ' bringing these [protection and enhancement of the built, natural and historic environment] qualities together, we will eventually be able to move away from a net loss of biodiversity to achieving net gains for nature'. (Environment Agency RPLP/814). Biodiversity net gain is vital to ensure the current status of species and habitats does not decline. (Environment Agency RPLP/814). Encouraged that para 16.14 covering the Nature Improvement Partnership includes guidance explaining how development can contribute towards its aims. (Environment Agency RPLP/814). Pleased that paragraph 16.22 identifies future issues regarding water based pollution and air quality, and the benefits of trees is identified. (Environment Agency RPLP/814). Welcomes reference to the RAMS. (Rochford District Council RPLP/1673). Commends commitment to RAMS. (Natural England RPLP/2556). Commends commitment to review Green Grid Strategy. (Natural England RPLP/2556). Commends the broad list of green infrastructure projects included at NE1 (3). (Natural England RPLP/2556). 	considered that the plan is compliant with this policy in itself. The principle objection in relation to policy NE1 is from the Bridleway Association who seek specific reference of bridleway. Bridleways are a category of public right of way. Part 3b covers all PROW, and does not therefore discriminate against any group of users. No amendment to policy NE1 is therefore considered necessary in respect of this representation. Whilst supportive, some of the statutory and nature conservation bodies suggested amendments to policy NE1. • The Environment Agency sought reference its emerging guidance on Biodiversity Net Gain. As the Council does not know what this says, it cannot commit to cross-referencing it at this time. • The Environment Agency sought reference to the Bugslife Bee-Line

Section/Para/ Policy	Summary of Responses	Council's response
	 Objection: Policy NE1 does not mention equestrian access. This discriminates against a significant user group. (Essex Bridleways Association RPLP/369). The Green Grid Strategy does recognise the need for equestrians. (Essex Bridleways Association RPLP/369). The needs of equestrians are catered for in Thurrock. (Essex Bridleways Association RPLP/369). The connectivity of bridleways is a duty to cooperate matter. (Essex Bridleways Association RPLP/369). The overall proposals in the Local Plan contradict the objectives of Policy NE1. The local plan is overly focused on delivering housing at the expense of the environment. Other comment/s: Encourage the use of alternatives to hard landscaping where feasible. (Environment Agency RPLP/814). There is guidance on biodiversity net gain which should be referred to. (Environment Agency RPLP/814). We would suggest adding a line in the policy about the importance of pollinators. (Environment Agency RPLP/814). Encouraged that the importance, fragility and benefits of Local Wildlife sites are recognised. These are not only important habitats but also have benefits to health and the economy. (Environment Agency RPLP/814). 	project. This is considered too detailed for a local plan. • ECC felt that the policy should be reordered as the RAMS is operational. The protection of Natura 2000 sites is a legal requirement. The Council's decision to address this upfront in policy NE1 is therefore appropriate. • Essex Wildlife Trust sought for clarity to be provided that biodiversity net gain should be measurable. This amendment is supported.

Section/Para/ Policy	Summary of Responses	Council's response
	 Paragraph 16.11 refers to the River Basin Management Plans which deliver the requirements of the EU Water Framework Directive. Previous comments regarding the split of the Local Plan area between the Thames and Anglian River Basin Districts have been addressed. (Environment Agency RPLP/814). Seeks acknowledgement of the South Essex Green and Blue Infrastructure Study being prepared for the JSP. (Rochford District Council RPLP/1673). As the RAMS is operational the policy should be re-ordered to put this last. (Essex County Council RPLP/1802). Seeks for additional clarity be inserted in part 3c of policy NE1 to ensure the protection of priority habitats, and secure measurable net gains for biodiversity. (Essex Wildlife Trust RPLP/1836). Consideration needs to be given as to how the reviewed Green Grid Strategy can be effectively implemented if specific projects have not been identified but housing sites are being allocated now. (Natural England RPLP/2556). Modification/s requested: Amend policy NE1 to include opportunities for increased access for all users, including equestrians. (Essex Bridleways 	
	Association RPLP/369).	

Section/Para/ Policy	Summary of Responses	Council's response
	 Reference the guidance available on biodiversity net gains. Include reference to the importance of pollinators. (Environment Agency RPLP/814). Councils and Developers should be more accountable. To re-order policy NE1, with (1) to be moved to the end. (Essex County Council RPLP/1802). Suggested wording changes to part 3. c) of policy NE1. (Essex Wildlife Trust RPLP/1836). 	
Policy NE2: Country Parks	 Support: Support for the principles set out in Policy NE2. (Rochford District Council RPLP/1674). Objection: Policy NE2 should be amended to include opportunities for increased access to all users, including equestrians. (Essex Bridleways Association RPLP/370). A number of country parks in the district contain designated sites on which recreational activity can impact on. (Natural England RPLP/2558). The policy should reference concepts such as visitor carrying capacity, and unpack the relevant impact pathways, and identify suitable mitigation measures as appropriate. (Natural England RPLP/2558). Modification/s requested:	The Bridleway Association seek specific reference to bridleway provision in this policy. Bridleways are a category of public right of way. Part 1 covers all PROW, and does not therefore discriminate against any group of users. No amendment to policy NE2 is therefore considered necessary in respect of this representation. Natural England have raised a concern regarding the relationship between recreation and nature conservation objectives within Country Parks. Policy NE2 covers existing Country Parks, not new allocations. It is not the role of the local plan to set out the site management strategies for Country Parks. Policy NE2

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	 Amend policy NE2 to include opportunities for increased access for all users, including equestrians. (Essex Bridleways Association RPLP/370). The policy should reference concepts such as visitor carrying capacity, and unpack the relevant impact pathways, and identify suitable mitigation measures as appropriate. (Natural England RPLP/2558). 	puts the Council in a position to refuse proposals for recreational development which would cause direct or indirect disturbance to areas of biodiversity significance. It also makes clear that urbanisation and segregation of wildlife corridors is not acceptable. No modification to this policy is therefore considered necessary in respect of this representation.
Policy NE3: Local Wildlife Sites	 Support: Support for the principles set out in policy NE3. (Rochford District Council RPLP/1675). Support for the principles set out in policy NE3. (Natural England RPLP/2559). Objection: This policy is not underpinned by an up to date evidence base. (Essex Wildlife Trust RPLP/1837). Historically Basildon has not been very good at protecting Local Wildlife sites. Ba24; Ba44 are irreparable lost to development. Ba28; Ba31 and Ba51 have been harmed by development. Ba23 and Ba55 are threatened with loss or harm. Some of these sites are unique and irreplaceable. Their loss cannot therefore be mitigated. 	Whilst there is general support for this policy, including from Natural England, Essex Wildlife Trust is concerned it is not based on an up to date evidence base. The Council is of the view that the evidence base that underpins the Local Plan is proportionate, and this policy does not need amending. Some of the sites identified as LoWS, are considered to be at risk from development. This concern is noted, however it is the purpose of policy NE4 to manage such risks appropriately.

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	 Particularly concerned about Ba23 which will almost be completely lost to development as an urban site. Modification/s requested: Demonstrate the plan is informed by an up to date evidence base. (Essex Wildlife Trust RPLP/1837). Do not develop on any Local Wildlife Sites. 	
Paragraph 16.32 Policy NE4: Development Impacts on Ecology and Biodiversity	 Support: Supportive of points 16.32 and 16.35. (Environment Agency RPLP/2649). Other comment/s: Include reference in paragraph 16.32 to the need for enhancements to biodiversity. (Essex County Council RPLP/1803). Modification/s requested: Include reference in paragraph 16.32 to the need for enhancements to biodiversity. (Essex County Council RPLP/1803). 	The modification to paragraph 16.32 is supported by the Council, as it aligns with the NPPF.
Paragraph 16.33 Policy NE4: Development Impacts on	Other comment/s: • Emphasis of paragraph should be changed to focus on meeting the requirements of Conservation of Habitats and Species Regulations. (Essex County Council RPLP/1804).	The modification proposed is supported by the Council as it clarifies the role of the RAMS to deliver mitigation.

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Ecology and Biodiversity	 Modification/s requested: Change the emphasis of paragraph 16.33 to focus on meeting the requirements of Conservation of Habitats and Species Regulations. (Essex County Council RPLP/1804). 	
Paragraph 16.35 Policy NE4: Development Impacts on Ecology and Biodiversity	 Support: Supportive of points 16.32 and 16.35. (Environment Agency RPLP/2649). Other comment/s: The requirement in relation to the RAMS is not to contribute to the RAMS per se, but to secure delivery of the mitigation. Developers could provide alternative mitigation via project level HRA and bespoke measures. (Essex County Council RPLP/1806). Reference to in-combination impacts incorrect. (Essex County Council RPLP/1807). With regard to 16.35 it is good that the impact of population growth on the Natura 2000 site has been identified as it will ensure impacts are addressed early. (Environment Agency RPLP/2649). Modification/s requested: Change paragraph 16.35, to clarify the references to and purpose of developer contributions in respect of the Essex Coast RAMS; including for example Contributions are being sought from the developers (i.e. not new residents); to avoid 	The modification proposed is supported by the Council as it clarifies the role of the RAMS to deliver mitigation. The technical clarification regarding incombination v. cumulative impacts is also supported.

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	 impacts from recreational disturbance in combination with other plans and projects; and to secure the delivery of the mitigation (as identified in the Essex Coast RAMS). (Essex County Council RPLP/1806). Change paragraph 16.35 from cumulative impact to read in combination. (Essex County Council RPLP/1807). 	
Paragraph 16.36 Policy NE4: Development Impacts on Ecology and Biodiversity	 Other comment/s: Reference to Standing Advice on Ancient woodland and Veteran trees incorrect. (Essex County Council RPLP/1808). Modification/s requested: Change paragraph 16.36 to include reference to revised Standing Advice on Ancient woodland and Veteran trees. (Essex County Council RPLP/1808). 	The Council has reviewed paragraph 16.36. It does not refer to specific standing advice and is therefore not incorrect. No amendment is therefore deemed necessary.
Paragraph 16.37 Policy NE4: Development Impacts on Ecology and Biodiversity	 Other comment/s: Water voles should be included in the list of protected species under paragraph 16.37. Modification/s requested: Include water voles in the list of protected species under paragraph 16.37. 	The Council is supportive of this minor addition to paragraph 16.37.
Policy NE4: Development Impacts on	Support: • The Forestry Commission is satisfied the Borough Council has taken into consideration and included reference to	The general approach to this policy is supported the Statutory or nature conservation bodies. However, concerns were expressed by the Woodland Trust,

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Ecology and Biodiversity	 Government policy with regard to ancient woodland. (Forestry Commission RPLP/202). The protection offered to ancient woodland is welcomed. (Forestry Commission RPLP/202). Generally support the strong requirements of policy NE4. (Woodland Trust RPLP/767). It is welcomed that the policy recognises that a HRA may be needed for planning applications. This increases the opportunity for environmental enhancements. (Environment Agency RPLP/2649). Order of considerations under part 4 of the policy NE4 addresses previous comments, and the EA are therefore satisfied. (Environment Agency RPLP/2649). 	Natural England and Essex Wildlife Trust about the application of the IROPI test to all European sites, SSSIs and ancient woodland. It was considered that the tests relevant to each designation should apply, and in order to comply with national policy the Council support this amendment. In addition, and consist with earlier changes, EWT has sought for this policy to specify that Biodiversity Net Gain should be measurable. Again, the Council support this amendment.
	 Objection: The supporting text makes strong reference to the protection of ancient woodlands. It is not considered that the wording in policy NE4 is however sufficiently strong. (Woodland Trust RPLP/767). The wording should be strengthened to reflect para 175 of the NPPF. (Woodland Trust RPLP/767). Historically Basildon has not had sufficient resources to monitor and enforce mitigation measures, the solar farm at Outwood Farm as an example. (Mill Meadows Society RPLP/1404). 	Various other objections were raised in respect of this policy by the Norsey Wood Society and the Mill Meadows Society. These challenge the Council's evidence base, the Council's understanding of ecology issues and the Council's ability to resource the requirements of this policy. The purpose of policy NE4, which is founded on a robust evidence base, is to enhance protection of the natural environment, and it is considered that these objections reflect on past policy rather than policy

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	 The Local Plan is weak on measures to result in a net gain in biodiversity. (Mill Meadows Society RPLP/1404). Local areas of habitat, species and quiet recreation are important particularly given the wider urban context. (Mill Meadows Society RPLP/1404). The local plan does not contain specific measures to protect habitats. (Mill Meadows Society RPLP/1404). The local plan is poorly informed in respect of declining species and does not include measures to protect them. (Mill Meadows Society RPLP/1404). The local plan will cause biodiversity to decline around Billericay. (Mill Meadows Society RPLP/1404). Reference to any biodiversity net gains (and losses) to be measurable. (Essex Wildlife Trust RPLP/1838). In respect of IROPI for European Sites, alternatives should be considered before the IROPI test is applied. (Essex Wildlife Trust RPLP/1838). The Council does not understand biodiversity issues, and has not set out a clear policy to address them. (Norsey Wood Society RPLP/2010). Existing biodiversity levels have not been quantified and there are no monitoring arrangements in place. (Norsey Wood Society RPLP/2010). The supporting text does not reference the NERC Act or the Essex BAP. (Norsey Wood Society RPLP/2010). 	NE4 in the Revised Publication Local Plan.

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	 Reference to biodiversity in relation to allocations is less specific than in the draft. (Norsey Wood Society RPLP/2010). It is expected that NE4 (4d and 4e) will be needed in at least some cases. (Norsey Wood Society RPLP/2010). Historically Basildon has not had sufficient resources to monitor and enforce mitigation measures. (Norsey Wood Society RPLP/2010). Policy GB11 does not make any commitment as to how biodiversity enhancements will be achieved. (Norsey Wood Society RPLP/2010). BREEAM principles should be mentioned in Chapter 12. (Norsey Wood Society RPLP/2010). The Association of Local Government Ecologists 'Biodiversity Planning Toolkit' is not referenced in the Local Plan. (Norsey Wood Society RPLP/2010). Habitats should be protected for common species, not just rare species. (Norsey Wood Society RPLP/2010). The commitments and policies on environmental issues in the Local Plan do not meet the requirements of the NPPF or the NERC act as they are not clearly thought out and seem to be optional extras. (Norsey Wood Society RPLP/2010). Should make a distinction between nationally and internationally designated sites. (Natural England RPLP/2560). Natural England would like to discuss the wording in relation to the RAMS to ensure the policies effectiveness. (Natural England RPLP/2560). 	

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	 All species should be protected under part 4 of policy NE4, not just protected and priority species. Mitigation and compensation should occur before a habitat is destroyed. The Council is not resourced to enforce conditions. Other comment/s: No specific comments made in respect of policy NE4. (Billericay Action Group RPLP/1137). Modification/s requested: Suggested wording changes to policy NE4. (Woodland Trust RPLP/767). Provide a statement that Planning will pro-actively monitor all development for compliance with Planning Conditions and will increase its Enforcement capacity to ensure that Planning Conditions with respect to minimising and compensation for impacts on ecology and diversity are met. (Mill Meadows Society RPLP/1404). Suggested wording changes to policy NE4. (Essex Wildlife Trust RPLP/1838). Make a distinction between nationally and internationally designated sites. (Natural England RPLP/2560). 	
Policy NE5: Development Impacts on	Objection: • A large amount of landscape will be lost to development, with insufficient planting to soften the impact.	The objections raised in respect of this policy appear to overlook its purpose in overcoming the issues raised. The

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Landscape and Landscape Features	 2 or 3 new trees should be planted for every tree lost to development. People do not make space for gardens in development, preferring car parking spaces. Each house should have a garden to encourage wildlife and blend with the landscape. Modification/s requested: More should be done to retain planting and landscape. 	modification requested is the whole purpose of policy NE5. No amendment is therefore deemed necessary.
Paragraphs 16.51 – 16.52 Policy NE6: Pollution Control and Residential Amenity	Other comment/s: Reference should be made to the ongoing air quality work between BBC and ECC in response to the UK air Quality Action Plan for Nitrogen Dioxide. (Essex County Council RPLP/1809). Modification/s requested: Basildon Council to work with Essex County Council to include reference to air quality and to reflect the latest position. (Essex County Council RPLP/1809).	The Council supports this factual update to the supporting text to policy NE6.
Policy NE6: Pollution Control and Residential Amenity	Objection: Historically enforcement activity taken by the Council has caused pollution. (Dale Farm Residents Group RPLP/3229, The Gypsy Council RPLP/3230). A policy requirement should be introduced requiring the pollution impacts of enforcement actions to be assessed. (Dale	An objection has been raised in respect of the Council's Air Quality Monitoring Programme. The Council has carried out air quality monitoring over a number of years in accordance with the Environment Act 1995. Annual reports

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	 Farm Residents Group RPLP/3229, The Gypsy Council RPLP/3230). The Council's air quality monitoring programme is insufficient and not complying with legal requirements. Development in Billericay (specifically Tye Common Road area) will increase air pollution. Sustainable and active travel will not reduce the dominance of private vehicles. Modification/s requested: A requirement that prior to any decision to take action based on an enforcement notice that there is an assessment of the pollution effect of any action proposed to be taken. (Dale Farm Residents Group RPLP/3229, The Gypsy Council RPLP/3230). Policy NE6 should have a paragraph to commit the council to monitoring more air pollutants including continuous monitoring of SO2, NO2 and PM10 at least. There should also be an assessment of air quality down wind of the waste incinerator to check for potential pollutants such as dioxins, heavy metals and dust. Do not expose residents of Tye Common Road to an exponential increase in air and noise pollution. 	are submitted to Defra in this regard. Since 2017, the Council has been working closely with Defra on the UK Air Quality Plan, addressing issues on the A127. This has resulted in some additional oversight and additional monitoring. Given this oversight, it is considered the Council's air quality monitoring programme is sufficient, and it would not be the place of the local plan to dictate that in any event. In relation to site allocations within the Local Plan, including site H17c mentioned in the representations, air quality matters have been considered for all sites, and the evidence suggests that air quality is below European Limits. Measures are included within the local plan to manage congestion and encourage sustainable and active travel. Electric vehicles are also encouraged. These measures to limit the use of private vehicles are consistent with national policy.

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		Finally, a representation has been submitted in respect of the consideration given to pollution issues as part of the enforcement process, seeking a modification to the Local Plan. It is consider that this would site outside the scope of the Local Plan, as it is an operational consideration.
Policy NE7: Development on Contaminated Land	 Other comment/s: Pleased to see cross reference to EA documents. (Environment Agency RPLP/2650). GP3 has been superseded by the Environment Agency's approach to Groundwater Protection 2018. (Environment Agency RPLP/2650). 	A minor amendment to paragraph 16.58 is required to reflect the most recent Environment Agency guidance on Groundwater protection.
Policy NE8: Ensuring Health and Safety in Development	 Support: Sewerage undertaker generally supportive of policy. (Anglian Water RPLP/2136). Objection: There is a risk that odour and amenity issues could restrict continued use of existing Water Recycling Centres if receptors are too close. (Anglian Water RPLP/2136). The policy should apply to some non-housing receptors such as offices, which are also sensitive to odours. (Anglian Water RPLP/2136). 	In response to Anglian Waters comments the Council would support an amendment to policy NE8 which extends the policy requirements to office developments also as a sensitive receptor.

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	 Other comment/s: The policy reflects the 400m used in the Anglian Water Asset Encroachment Methodology. However, this is currently being reviewed to account for more accurate information on odour and amenity impacts. (Anglian Water RPLP/2136). Modification/s requested: Amend policy NE8 to include reference to non-housing receptors such as offices. 	
Policy NE9: Development of Agricultural Land	 Support: Plan has much to commend it in terms of protection of the environment, biodiversity and visual amenity. (CPREssex RPLP/1879). Objection: Development of agricultural land should be avoided. Proposed allocations H17a and H17c are currently in use for agricultural purposes and should not form part of the plan. The quantum of development and road building has the potential to harm the environment, biodiversity and visual amenity, both locally and cumulatively. (CPREssex RPLP/1879). The local plan overlooks food and crop production. (CPREssex RPLP/1879). 	CPRE have raised an objection to the Local Plan's approach to agricultural land and the countryside more generally. The majority of the land beyond the existing urban area is Grade 3 agricultural land. Natural England do not provide evidence to distinguish between Grade 3a and 3b. However, there is no land identified as Grade 1 or 2. There is therefore insufficient lower grade land on which to locate urban extensions, but it is certainly the case that no Grade 1 or 2 land has been impacted. Site selection has been undertaken in this knowledge, and has also been informed site level

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	 Practically all the agricultural land in the Borough is Grade 3 and falls within the description of Best and Most Versatile. (CPREssex RPLP/1879). The NPPF expects the economic benefits of the BMV agricultural land to be considered. (CPREssex RPLP/1879). The plan contains little detail on the management of BMV agricultural land nor the preference for using lower grade land first. (CPREssex RPLP/1879). Questions whether the plan does enough to safeguard the long-term capability of BMV land as a resource in order to maintain food production and prevent over-reliance on imports. (CPREssex RPLP/1879). Modification/s requested: Give greater consideration to the significance and importance of agricultural land. (CPREssex RPLP/1879). 	landscape assessments and site level ecology assessments. CPRE have suggest that the use of agricultural land will extinguish economic benefits in the Borough, however it is considered by the Council that these benefits have been overstated when evidence regarding agricultures contribution to the local economy is considered. The EDNA indicates that agriculture and fishing contributes less than 0.0% to the economic output of the borough.
Chapter 17: Cons	erving and Enhancing the Historic Environment	
Chapter 17: Conserving and Enhancing the Historic Environment	 Other comment/s: Proposes restructuring the chapter to minimise repetition of content within the policy context and evidence section for each policy. (Historic England RPLP/2175). Recommends new policy for Heritage at Risk to be applicable to any assets deemed at risk if identified in the future. (Historic England RPLP/2175). 	Historic England seek for the chapter to be rewritten to minimise repetition. It is not considered that this would add to the soundness of the plan and therefore no amendment to this chapter in this regard is supported at this time. It should be noted that this chapter has not changed

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	 Recommends producing and maintaining a local Heritage at Risk List register. (Historic England RPLP/2175). Modification/s requested: Restructure the chapter to minimise repetition of content within the policy context and evidence section for each policy. (Historic England RPLP/2175). Include new policy for Heritage at Risk to be applicable to any assets deemed at risk if identified in the future. (Historic England RPLP/2175). Produce and maintain a local Heritage at Risk List register. (Historic England RPLP/2175). 	considerably since the Draft Local Plan, and this matter was not raised by Historic England at that time. With regard to their proposals regarding a policy on Heritage at Risk, the Council is happy to enter into discussions with Historic England on this matter. However, no amendment to the Local Plan is supported at this time. It should be noted that ECC prepare a Heritage at Risk register for Essex as a whole, which could inform such a policy. Again, this matter was not raised in response to the Draft Local Plan consultation by Historic England.
Policies HE1 to HE5	 Objection: Draft policies HE1 to HE5 are not compliant with national policy. They should reference the correct tests for assessing harm on designated and non-designated assets, as set out in the NPPF. (Gladman Developments Ltd RPLP/2030). Modification/s requested: Amend policies HE1 to HE5 to reference the correct tests for assessing harm on designated and non-designated assets, as 	The Council notes that policy HE5 should be amended to refer to the correct policy test in the NPPF. It is considered that policies HE1 to HE4 however already refer to the correct tests and do not need amending. An amendment to the supporting text in paragraph 17.9 is also supported to ensure the correct type of designation is being referred to.

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	set out in the NPPF. (Gladman Developments Ltd RPLP/2030).	
Paragraph 17.3 Policy HE1: Strategy for Conserving and Enhancing the Historic Environment	 Other comment/s: Paragraph 17.3 should be amended to make reference to the Essex Historic Environment Record. (Essex County Council RPLP/1810). Modification/s requested: Amend paragraph 17.3 to make reference to the Essex Historic Environment Record. (Essex County Council RPLP/1810). 	The clarification proposed by ECC to the supporting text is supported.
Policy HE1: Strategy for Conserving and Enhancing the Historic Environment	 Support: General support for the principles set out in draft policy HE1. (Rochford District Council RPLP/1676). General support for Strategic Objective 1. (Historic England RPLP/2132). Objection: General support for Strategic Objective 1. (Historic England RPLP/2132). There is a lack of detailed and proportionate historic environment evidence base for some parts of the Plan. (Historic England RPLP/2132). Heritage Impact Assessments/Statements should be required for the site allocations. (Historic England RPLP/2132). 	A number of matters are raised by Historic England in objection to the Local Plan which will be resolved through ongoing discussions. However, the Council is of the view that it has used a proportionate evidence base to inform the Local Plan, including evidence of statutory designations and site level Archaeological Assessments, both of which have been factored into the Sustainability Appraisal process and the decision making process. It is agreed that the outcome of these discussions may well be a Heritage Topic Paper to clarify this.

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	 Wording of the historic environment policies HE1 to HE4 does not conform to the NPPF. (Historic England RPLP/2132). Recommends the preparation of a Heritage Topic Paper. (Historic England RPLP/2172). Recommends specific mention of listed buildings and registered parks and gardens in policy HE1. (Historic England RPLP/2172). Recommends specific reference to designated and non-designated heritage assets and their settings within policy HE1. (Historic England RPLP/2172). Recommends replacing 'safeguard' with conserve' in criterion 2 of policy HE1. (Historic England RPLP/2172). Welcomes reference to energy efficiency and renewable energy in policy HE1. (Historic England RPLP/2172). Proposed development will change Billericay so that it is no longer a historic town. Scale of housing too great for Billericay. Modification/s requested: Additional historic environment evidence needed. (Historic England RPLP/2132). All site allocation require a Heritage Impact Assessments/Statements. (Historic England RPLP/2132). Prepare a Heritage Topic Paper. (Historic England RPLP/2132). Prepare a Heritage Topic Paper. (Historic England RPLP/2172). 	It is however possible for the Council to support a number of the modifications proposed by Historic England at this time to policy HE1: • Amendment to point 1 to include reference to listed buildings as this provides clarity. There are no registered parks or gardens in Basildon Borough, so such a reference would be superfluous. • Amendment to point 1 to clarify the coverage of both designated and non-designated heritage assets. • Amendment to point 2, replacing safeguard with conserve to reflect the NPPF better. It has not been possible to accept all of the amendments suggested however, as to require all allocated sites to provide a Heritage Impact Assessment appears burdensome, given that the Site Level Archaeological Impact Assessments considered both designated and non-

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	 Amend policy HE1 to mention listed buildings and registered parks and gardens. (Historic England RPLP/2172). Amend part 1 of policy HE1 to include specific reference to designated and non-designated heritage assets and their settings. (Historic England RPLP/2172). Amend part 2 of policy HE1 to replace 'safeguard' with conserve'. (Historic England RPLP/2172). Reduce scale of development within Billericay. 	designated assets and did not identify heritage in all circumstances. Representations were also received by residents in respect of this policy, indicating growth would affect the historic nature of Billericay. The evidence indicates that there is limited scope for urban growth within Billericay, with much of the growth proposed away from the historic core of the settlement. Growth is therefore unlikely to cause harm to the historic core of Billericay, and will most likely improve the vitality of businesses etc. operating from historic buildings to their potential benefit.
Policy HE2: Conservation Areas	 Support: Supports the Conservation Area designation of Noak Bridge. (Cllr Sargent RPLP/744). Welcome commitment to keep Conservation Areas under review. (Historic England RPLP/2173). Other comment/s: Suggests including reference to Conservation Area Appraisals and Management Plans as part of the review. (Historic England RPLP/2173). 	Historic England support this policy, but seek an amendment to part 1 to ensure better alignment with legislation. This amendment is supported. They also seek a policy commitment to the updating of Conservation Area Management Plans. It is not appropriate to make this amendment to policy HE2, as it is a DM policy. Furthermore, as Conservation Area Appraisals and

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	 Amendment to point 1 of policy HE2 to better align with legislation. (Historic England RPLP/2173). Modification/s requested: Include reference to Conservation Area Appraisals and Management Plans as part of the review. (Historic England RPLP/2173). Amend point 1 of policy HE2 to better align with legislation. (Historic England RPLP/2173). 	Management Plans full under different legislation, their preparation is generally outside the scope of the Local Plan altogether. This amendment to policy HE2 is not therefore supported.
Policy HE3: Listed Buildings	 Objection: Disagrees with the inclusion of the wording 'exceptional circumstances' within point 1a of policy HE3 and recommends 1a be deleted. (Estates and Agency Holdings Limited RPLP/2119). Recommends that point 2b of policy HE3 be deleted as it has rephrased national policy and created ambiguity. (Estates and Agency Holdings Limited RPLP/2119). Modification/s requested: Delete part 1. a) of policy HE3. (Estates and Agency Holdings Limited RPLP/2119). Delete part 2. b) of policy HE3. (Estates and Agency Holdings Limited RPLP/2119). 	The Council cannot support the modification sought in respect of policy HE3: Listed Buildings. Substantial harm to or loss of any listed building is defined in the NPPF as being, as a minimum, exceptional. Policy HE3 reflects this, and any amendment which weakened this would be contrary to the NPPF. Points 2a, b and c of policy HE3 set out what should be provided as part of an application for proposals that affect the significance of a listed building. Deleting 2b of policy HE3 is likely to result in uncertainty as to what information is required in order for the Council to make an informed decision.

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Paragraph 17.47 HE4: Scheduled Monuments and Archaeology	 Other comment/s: Paragraph 17.47 should be amended to make reference to the Historic Environment Record when preparing Heritage Statements. (Essex County Council RPLP/1811). Modification/s requested: Amend paragraph 17.47 to make reference to the Historic Environment Record when preparing Heritage Statements. (Essex County Council RPLP/1811). 	The Council is supportive of this modification as it would provide further clarity on what evidence should be used to support the preparation of Heritage Statements.
HE4: Scheduled Monuments and Archaeology	 Other comment/s: Recommends changing the word mitigating to mitigation within point 2 of policy HE4. (Historic England RPLP/2174). Modification/s requested: Amend the word mitigating to mitigation within point 2 of policy HE4. (Historic England RPLP/2174). 	The minor modification to correct a typing error is supported by the Council.
HE5: Locally Identified Heritage Assets	Support: • Welcomes commitment to prepare a local list. (Historic England RPLP/2175). Objection: • List of non-designated heritage assets does not exist. Other comment/s:	Historic England generally welcome this policy but seek amendment to the supporting text to ensure the correct test is applied with regards to non-designated heritage assets, in compliance with the NPPF. This amendment is supported by the Council. It is the intention of the Council to prepare a Supplementary Planning

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	 Criteria for identifying assets for the local list should be produced and ideally included within a Local Plan. (Historic England RPLP/2175). Amendment to paragraph 17.54 is sought to ensure it reflects the appropriate test. (Historic England RPLP/2175). Non-designated assets should be protected by Local Plan policies. Modification/s requested: Amend paragraph 17.54 is sought to ensure it reflects the appropriate test. (Historic England RPLP/2175). Include criteria for identifying assets for the local list in the Local Plan. (Historic England RPLP/2175). Include a list of non-designated heritage assets within an appendix of the Local Plan. 	Document containing the local list of non-designated heritage assets as stated within paragraph 17.55. This is scheduled for 2019/20.
Chapter 18: Imple		
Policies IMP1 to IMP4	 Objection: Amend Policies IMP1-4 relating to implementation and developer contributions to clarify and strengthen intent in order to effectively secure and deliver the necessary infrastructure and contributions so that ECC's role as an infrastructure provider is not jeopardised. Policy IMP2 assumes that CIL is the mechanism of choice for all infrastructure (Essex County Council RPLP/1813). 	The Council agrees that the implied assumption that CIL is the mechanism of choice for all infrastructure should be removed from the Local Plan. The Council has produced a monitoring framework alongside the Local Plan. This has been updated to reflect

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	 There is no monitoring policy or framework to monitor and support the implementation of the document or Implementation Policies IMP1-4, as required by the NPPF. (Essex County Council RPLP/1814). Modification/s requested: Amend Policies IMP1-4 relating to implementation and developer contributions to clarify and strengthen intent in order to effectively secure and deliver the necessary infrastructure and contributions so that ECC's role as an infrastructure provider is not jeopardised. (Essex County Council RPLP/1813). Produce a monitoring policy or framework to monitor and support the implementation of the document or Implementation Policies IMP1-4, as required by the NPPF. (Essex County Council RPLP/1814). 	changes in policies and monitoring targets as the plan has been developed. It has been used to prepare the AMR in 2016/17 and 2017/18. The Council agrees that this framework should form part of the Local Plan.
Policy IMP1: Implementation Strategy	 Support: In general support of policy IMP1. (Rochford District Council RPLP/1677). Objection: Infrastructure should be delivered before development. (House of Commons RPLP/2185). No detail on what Infrastructure will be put into place. Concerns about inadequate funding and delivery of infrastructure. 	It is the Council's view that development and infrastructure delivery should be aligned. The Council will therefore be seeking to phase development to ensure that additional infrastructure capacity is created alongside new development, as identified in the IDP and various allocation policies within the plan. There are various mechanisms available for securing the investment necessary to

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	The Plan or supporting evidence should provide a housing trajectory or infrastructure phasing plan clearly setting out the proposed rates of housing delivery. This will enable scrutiny of evidence in respect of delivery of proposed infrastructure improvements supporting housing growth to ensure that both are viable and deliverable when considered against proposed rates of housing delivery. (Castle Point Borough Council RPLP/1852).	deliver infrastructure and these include using planning obligations, CIL and phasing to ensure delivery of infrastructure as set out in the Infrastructure Delivery Plan 2018. These are set out in policies IMP1, IMP2 and IMP3.
	 While it is intended that the Infrastructure Delivery Plan will be maintained as a living document, it can still only represent a snapshot in time and may not reflect the most up to date circumstances or detail of proposals coming forward. As such, the requirement for infrastructure to support an application should be confirmed at the time of an application with regard to the Infrastructure Development Plan, but also taking account of other relevant evidence including up to date information from infrastructure providers and with regard to the detail of development proposed and its impacts. (Gleeson Developments Ltd RPLP/1882, Taylor Wimpey RPLP/2051). Where Planning obligations are used to secure on-site measures, they should be deductible from CIL, where the same measures are included on the 123 list. (Gleeson Developments Ltd RPLP/1882, Taylor Wimpey RPLP/2051). The Infrastructure and Delivery Plan document should contain more detailed information on how the funding gaps will be met and there is no indication on how the CIL will be divided 	Castle Point Borough Council sought for a housing trajectory to be included within the Local Plan, along with an infrastructure phasing plan. The Council presented a housing trajectory to the Council as part of its decision making process in October 2019, and would be willing to incorporate it within the Local Plan if the Inspector felt it necessary. However, the trajectory does make assumptions about the timing of infrastructure delivery and build out rates which may change over time, potentially positively. There is a concern that the insertion of a trajectory may act to artificially hold sites back unnecessarily, and may be best managed outside the plan. The requested phasing strategy for

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	between the many infrastructure needs. (Billericay Town Council RPLP/1909).	infrastructure will be incorporated into the next version of the IDP.
	 Modification/s requested: Infrastructure should be delivered before development. (House of Common RPLP/2185). Provide detail on the required infrastructure. Ensure adequate funding and delivery of infrastructure. Provide a housing trajectory or infrastructure phasing plan in the Plan or supporting document clearly setting out the proposed rates of housing delivery. This will enable scrutiny of evidence in respect of delivery of proposed infrastructure improvements supporting housing growth to ensure that both are viable and deliverable when considered against proposed rates of housing delivery. (Castle Point Borough Council RPLP/1852). Suggested wording changes to policy IMP1 regarding infrastructure requirements identified in the IDP. (Gleeson Developments Ltd RPLP/1882, Taylor Wimpey RPLP/2051). Where Planning obligations are used to secure on-site measures, they should be deductible from CIL, where the same measures are included on the 123 list. (Gleeson Developments Ltd RPLP/1882, Taylor Wimpey RPLP/2051). Provide more detailed information in the Infrastructure and Delivery Plan document on how the funding gaps will be met and there is no indication on how the CIL will be divided 	The Council agrees that it may be appropriate to insert "and up to date information from infrastructure providers" within policy IMP 1, to reflect sudden or localised changes to infrastructure needs arising between updates to the IDP. The IDP is a living document and is updated on a regular basis and will be continually updated throughout the plan period to keep it reasonably up to date. The Infrastructure Delivery Plan is developed following extensive contact, research and engagement with all infrastructure providers for the Basildon Borough to identify specific infrastructure priorities. Paragraph 3.1.6 states that the IDP will continue to be updated and should not be read as an exhaustive assessment of infrastructure requirements at one moment in time. Although the IDP implies it, adding the line will provide more clarity.

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	between the many infrastructure needs. (Billericay Town Council RPLP/1909).	Some developer interests seek for the Council to deduct S106 payments from CIL. The local plan states that planning obligations will not be used to secure infrastructure requirements identified on the Community Infrastructure Levy Regulation 123 List thus avoiding double dipping. This amendment is not therefore required. Billericay Town Council seek for details on how CIL monies will be utilised. There are various mechanisms available for securing the investment necessary to deliver infrastructure and these include using S106 planning obligations, S278 agreements, CIL and public funding. Infrastructure requirements to be funded by the CIL will be identified on the Community Infrastructure Levy
Paragraph 18.12	Other comment/s:	Regulation 123 List. The clarity provided by this modification
Policy IMP2: Use of Planning Obligations	Amendments for clarification to avoid misinterpretation. The reference to "early years childcare" should be changed to "early years and childcare" To avoid the exclusion of other	is supported.

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	early years and childcare provision such as breakfast clubs, after school clubs etc. (Essex County Council RPLP/1812).	
	 Modification/s requested: Suggestion wording changes to amend paragraph 18.12 as suggested. (Essex County Council RPLP/1812). 	
Policy IMP2: Use of Planning Obligations	 Support: In general support of policy IMP2. (Sport England RPLP/836). Objection: Infrastructure should be delivered before development. The income from CIL will not fund the infrastructure required for the plan and developers are able to reduce the amount payable by producing a viability study. Please add conservation and enhancement of the historic environment to the list. (Historic England RPLP/2176). Other comment/s: Suggests updating the IDP to reflect the requirements arising from the new playing pitch and built facilities strategy. (Sport England RPLP/836). 	It is the Council's view that development and infrastructure delivery should be aligned. The Council will therefore be seeking to phase development to ensure that additional infrastructure capacity is created alongside new development. There are various mechanisms available for securing the investment necessary to deliver infrastructure and these include using planning obligations, CIL and phasing to ensure delivery of infrastructure as set out in the Infrastructure Delivery Plan 2018. These are set out in policies IMP1, IMP2 and IMP3.
	 Modification/s requested: Infrastructure should be delivered before development. Developers should not be able to opt out of infrastructure provision with a viability study. 	The Council agrees that the CIL will not fund everything required in terms of infrastructure, hence also having a policy with regard to planning obligations. CIL

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Policy	 Please add conservation and enhancement of the historic environment to the list. (Historic England RPLP/2176). Suggests updating the IDP to reflect the requirements arising from the new playing pitch and built facilities strategy. (Sport England RPLP/836). 	will have a role in securing funding for infrastructure from a broader range of developments, and is expected to raise a proportion of the infrastructure costs estimated within the IDP. Additional funding will be secured through S106 for local and site specific infrastructure requirements, and also from public funding. In terms of the policy itself amendments are sought. Historic England seek for conservation and enhancement of the historic environment to be added to the list on point 2 of Policy IMP2. This however specifically relates to infrastructure. Point 1 does already however provide coverage of requirements to mitigate impacts on the environment, which would include the historic environment. No amendment to
		the policy is therefore needed. It is noted that Sport England expect the
		IDP to be updated to reflect the recently approved PPS and BFS. The IDP is a

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		Living Document, and this will be done when it is next reviewed.
IMP3: Phasing of Development	 Support: In general support of the policy. (Anglian Water Services Ltd RPLP2138). Objection: Phasing should be applied so that sites that have more positive results and fewer negative results recorded in the Sustainability Appraisal Including Strategic Environmental Assessment are brought forward for development earlier than sites with fewer positive results and more negative ones. Infrastructure costs should not be allowed to compromise the provision of affordable housing. Modification/s requested: Put development sites into an order with sites causing less harm to the environment delivered first and those causing more harm towards the back end of the plan period. Revise or delete Policy IMP3 as it compromises provision of affordable housing. 	It is suggested that the sites in the plan should be phased in order of their sustainability appraisal outcomes. As there is an unmet need arising from the Local Plan, any proposals which artificially hold back sites cannot be accepted by the Council. It should be noted that the Council has already applied phasing in this plan to limit the quantum of development that may be delivered on certain sites in order to ensure that infrastructure provision and environmental mitigation measures are secured. This policy (IMP3) ensures proposals which would result in unmitigated harm to the environment or would see infrastructure capacity exceeded or community infrastructure needs unmet cannot occur until mitigation has occurred. There is a concern that IMP3 compromises the provision of affordable housing. As the most significant S106

Section/Para/ Policy	Summary of Responses	Council's response
		cost it is however appropriate for the Council to recognise that other development costs may affect its viability, and for the council to be clear as to when variations to the phased delivery of affordable housing may be appropriate. The Whole Plan Viability Assessment has determined that development within the Borough is generally viable at 31% affordable housing provision, taking into account the other policy requirements of the Local Plan. However there are some schemes with viability challenges because of exceptional development costs and in these cases, viability testing carried out as part of the Local Plan preparation suggests that only a reasonable proportion of affordable housing can be secured for the site to remain viable. Allowing for variation in the phased delivery of affordable housing may assist with overcoming this whilst ensuring overall provision in the longer-term.

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Section/Para/ Policy	Summary of Responses	Council's response
Policies IMP2 – IMP3	 Objection: Phasing of development and developer contributions will have implications for delivery. (Pigeon (Wickford) Ltd RPLP2230). Modification/s requested: Request that phasing of development and developer contributions do not have implications on delivery. (Pigeon (Wickford) Ltd RPLP2230). 	It is the Council's clear policy, as stated in policy SD1 and repeated throughout that development must be aligned with infrastructure delivery. Phasing may be required to achieve this. Policy IMP1 states that development will be phased or limited to ensure that infrastructure capacity is created to accommodate additional people and vehicles, alongside new development. Developments which would result in unmitigated harm to the environment, or would see infrastructure capacity exceeded or community infrastructure needs unmet will not be accepted. It is considered that this approach is consistent with national policy, which expects sustainable development, and is justified by evidence which shows that some of the allocation sites require infrastructure provision or environmental mitigation to occur before development can take place. In terms of developer contributions the Council is aware that these can affect development viability. This has been assessed via the Whole Plan Viability

Section/Para/ Policy	Summary of Responses	Council's response
		Assessment. It is considered the requirements of policies in the Local Plan are generally viable based on this evidence. It should however be noted that the Council recognises viability issues may arise, and therefore IMP2 also states that where an applicant feels that any planning obligation requirements will render a proposal unviable, they must supply to the Council a viability appraisal which will be independently assessed.
IMP4: Piecemeal Development	 While currently anticipated infrastructure requirements are identified within the allocations for specific sites, as noted in relation to Policy IMP1 the requirement for infrastructure can change over time and the requirement for infrastructure to support development should be confirmed at the time of an application with regard to the Infrastructure Development Plan, but also taking account of other evidence including up to date information from infrastructure providers and with regard to the detail of development proposed and its impacts. (Gleeson Developments Ltd RPLP/1883, Taylor Wimpey RPLP/2052). Concerns about making contributions for infrastructure that the council will later consider to be unnecessary and wants assurances against this by introducing time limits to 	Objections to this policy have been received from site promoters. The Council is clear that this is an infrastructure lead plan, and development must be supported by the appropriate infrastructure. No watering down of the infrastructure requirements through piecemeal development is therefore considered appropriate by the Council. The modifications sought are not therefore acceptable to the Council. In respect of concerns about unspent contributions, S106 agreements can have a refund clause inserted within the

Section/Para/ Policy	Summary of Responses	Council's response
	contributions. Also have concerns that the use of Planning Obligations and CIL will lead to double dipping. (Blue House Estate Limited and Gilbert Commercial Properties Limited RPLP/2114). Modification/s requested: Suggested wording changes to policy IMP4. (Gleeson Developments Ltd RPLP/1883, Taylor Wimpey RPLP/2052). Provide assurances that contributions will not later be considered as unnecessary by introducing time limits to contributions and confirm that Planning Obligations and CIL will not lead to double dipping. (Blue House Estate Limited and Gilbert Commercial Properties Limited RPLP/2114).	terms of the agreement at the time of the negotiation. This is normal practice. In terms of duplication S106 and CIL, the local plan states that planning obligations will not be used to secure infrastructure requirements identified on the Community Infrastructure Levy Regulation 123 List thus avoiding double dipping. CIL is intended to provide infrastructure to support the development of an area, rather than making individual planning applications acceptable in planning terms. As a result, some site specific infrastructure provision may still be necessary in order for a development to be granted planning permission.
Glossary and App	endices	
Glossary	Objection: Include Local List/Locally listed buildings in the glossary. (Historic England RPLP/2177). The definition of OAN is inaccurate. The definition of NPPF is inaccurate. Other comment/s:	Some amendments are proposed to the glossary. It is agreed that a definition of HIA (a health impact assessment) should be included in the glossary. It is not however possible to change the definition of OAN, or the NPPF, as these are beyond the Council's control.

Section/Para/ Policy	Summary of Responses	Council's response
	 Clarify the purpose of a 'Heath Impact Assessment' as required by the Local Validation List. (Essex County Council RPLP/1815). Modification/s requested: Include Local List/Locally listed buildings in the glossary. (Historic England RPLP/2177). Include a definition of a HIA in the glossary. (Essex County Council RPLP/1815). Change the definition of OAN in the Glossary. Change the definition of NPPF in the Glossary. 	The Council, as set out in chapter 17 intends to develop a Local List of Heritage Assets as an SPD in 2019. It is not available for inclusion as an appendix in the local Plan at this time.
Appendix 1: Evidence Base and Plans, Strategies and Guidance Documents	 Support: Support Appendix 1, it is very useful to provide a full evidence base within the plan. (Historic England RPLP/2177). Objection: Rights of Way Improvement Plan does not appear on list of evidence base and Essex Bridleways Association disappointed to note that it appears the ROWIP has not been used in the preparation of this Plan. (Essex Bridleways Association RPLP/371). The Green Belt Review 2013 and 2015 should not be on the list of evidence. Other comment/s: 	It is agreed that the modifications proposed in respect of the evidence base list should be made to reflect an accurate position.

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	 The evidence base list is not reflecting the most up to date sports evidence base. (Sport England RPLP/837). Modification/s requested: ROWIP should be used in the preparation of the plan. (Essex Bridleways Association RPLP/371). Update the evidence base to detail the most up to date sports evidence. (Sport England RPLP/837). Remove the Green Belt Review 2013 and 2015 from the list of evidence. 	
Appendix 5: Open Spaces, Indoor Sports Provision and Community Facilities	 Objection: Query why is the suggested open space standard for green space higher for new development outside the existing urban areas than for sites within the urban areas when it should be the other way round. (Countryside Properties (UK) Ltd RPLP/1336, Gleeson Developments/Avant Homes RPLP/1365). Barleylands should be included in the list of private sports facilities. The Open space assessment has not identified some information pertaining to Lake Meadows. Other comment/s: The evidence base list is not reflecting the most up to date sports evidence base. (Sport England RPLP/838). 	Updated PPS and BFS were approved by Committee in November 2018. It is therefore agreed that appendix 5 should be modified accordingly to reflect the requirements of the new evidence (which relies on Sports England Calculators). The PPS and BFS was prepared with substantial engagement with sport governing bodies, sports teams and facilities operators, as detailed in the assessment components of the respective reports. In terms of the requirements for open space provision this is based on a full PPG17 compliant assessment, and

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	 The development standard for the provision of public open space (5.7ha accessible open space per 1000 population) is too high and if applied to H16 will lead to more than a 3rd of the site being unable to be developed leading to higher densities which will result in a higher proportion of apartments and thus will not provide an appropriate mix of housing and will be contrary to the SHMA. (P and A Investments Ltd RPLP/2032). Modification/s requested: Update the evidence base to detail the most up to date sports evidence. (Sport England RPLP/838). Review the open space standards to provide a consistent approach to open space delivery, which is based on the need arising from the development, rather than the location. (Countryside Properties (UK) Ltd RPLP/1336, Gleeson Developments/Avant Homes RPLP/1365). Amend the development standard for the provision of public open space. (P and A Investments Ltd RPLP/2032). Barleylands should be included in the list of private sports facilities. Consultants should seek advice from locally informed staff 	whilst higher than in neighbouring Chelmsford City, are lower than in neighbouring Castle Point. The variation between urban sites and edge of settlement sites is recommended in that study, recognising that there are existing open spaces dotted throughout existing urban areas. In terms of the amendment sought regarding Barleylands, it is already included in the list of private open spaces with its primary purpose listed as Outdoor Sports Facility.		
Appendix 7: Essex SuDS Design Guide	when producing evidence base documents. Other comment/s: • Appendix 7 should be updated to refer to and reflect the Lead Local Flood Authority's revised SuDS Guidance published in	The Council is minded to accept this modification due to the importance of ensuring SUDS provision in Basildon		

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Principles and Local Standards	 2016 and the subsequent revisions to the Revised Critical Drainage Areas (2018) which informed the Draft Plan. (Essex County Council RPLP/1816). Modification/s requested: Update Appendix 7 to refer to and reflect the Lead Local Flood Authority's revised SuDS Guidance published in 2016 and the subsequent revisions to the Revised Critical Drainage Areas (2018) which informed the Draft Plan. (Essex County Council RPLP/1816). 	Borough which minimises the risk of surface water flooding. However, as revised guidance is imminent it may be equally appropriate to delete this appendix and refer the reader to the most up to date Essex SuDS Guidance instead in policies CC2 and CC4.
Policies Map		
Policies Map	 Objection: Policies map should be revised to include HELAA site SS0568. (Via Mark Jackson Planning RPLP/1937). Policies map should be revised to include HELAA site SS0497. (Via Mark Jackson Planning RPLP/2271). Policies map should be revised to include HELAA site SS0591. (Via Mark Jackson Planning RPLP/2282). Object to the proposed removal of Plotland areas from the policies map. The Plotland is well developed and should be treated as previously-developed land that offer appropriate opportunities for infill development to meet the Council's housing needs. (Collins & Coward Ltd RPLP/4636). 	The HELAA sites requested to be included on the Policies Map are not allocated, within the plan, and therefore these modifications cannot reasonably be made. With regard to the plotlands, the Policies Map reflects the policies in the Local Plan and there is no longer a Plotland Infill Policy in the Local Plan. The Plotland still remain in the Green Belt and are therefore subject to a strict development management policy and

Section/Para/ Policy	Summary of Responses	Council's response
	 Modification/s requested: Policies map should be revised to include HELAA site SS0568. (Via Mark Jackson Planning RPLP/1937). Policies map should be revised to include HELAA site SS0497. (Via Mark Jackson Planning RPLP/2271). Policies map should be revised to include HELAA site SS0591. (Via Mark Jackson Planning RPLP/2282). Reinstate the areas designated as Plotland on the extant and adopted Local plan Proposals Map. (Collins & Coward Ltd RPLP/4636). 	are subject to the Green Belt Infill policy GB4 in the Revised Publication Local Plan.
Mill Meadows Nature Reserve: Policies Map	 Objection: Amend boundary to Mill Meadows Nature Reserve to not include land in private ownership. Modification/s requested: Amend boundary to Mill Meadows Nature Reserve to not include land in private ownership. 	The Council agrees that this amendment should be made for accuracy purposes.
Policy H3: Policies Map	 Objection: Seeks modifications to the Policies Map with regard to the location of G&T sites. (Essex County Council RPLP/1765). Modification/s requested: Change the Policy Map to clearly denote Policy H3 existing Gypsy and Traveller Provision secured and safeguarded for that use. (Essex County Council RPLP/1765). 	For GDPR reasons the policies map does not identify areas occupied by specific ethnic groups. Although not identified on the policies map, the site will still be protected for G&T use by Policy H3.

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Policy H10: Policies Map	 Support: Supports the allocation of H10 and policies map reflects the developer's development vision. (Croudace Homes RPLP/1897). 	
Policy HC5: Policies Map	 Objection: Remove land at Linda Gardens from the schedule of pubic open spaces, as it is private land and the land owner has no intention of providing this site for public open space. This position has been recognised by an Inspector on Appeal. The landowner is seeking for this site to be removed from the current extent of the Green Belt and allocated for housing purposes. (Millwood Designer Homes Ltd RPLP/1826). Site shown as HC5 is part of the Craylands Regeneration programme. (Swan Housing RPLP/4965). Site shown as HC5 is part of the Laindon Town Centre Regeneration programme. (Swan Housing RPLP/4965). The whole of Kent View Recreation Ground should be designated a Local Green Space. Modification/s requested: Remove land at Linda Gardens from the schedule of pubic open spaces, as it is private land and the land owner has no intention of providing this site for public open space. This 	The site land at Linda Gardens is not available for public access and is unlikely to become so. It is not therefore deliverable and the Council accepts the open space designation should be removed. The Kent View recreation ground has been designated in part as a Field in Trust. This designation was made after the Local Green Space designation was identified through evidence base work, and therefore it is agreed that an amendment to the boundary of the Local Green Space designation is justified. Swan Housing has identified sites where they have planning consent to redevelop existing open space as part of
	open spaces, as it is private land and the land owner has no intention of providing this site for public open space. This position has been recognised by an Inspector on Appeal. The landowner is seeking for this site to be removed from the	

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	 current extent of the Green Belt and allocated for housing purposes. (Millwood Designer Homes Ltd RPLP/1826). Remove site which is shown as HC5 is part of the Craylands Regeneration programme. (Swan Housing RPLP/4965). Remove site which is shown as HC5 is part of the Laindon Town Centre Regeneration programme. (Swan Housing RPLP/4965). Amend the two areas within LGS50 Kent View Recreation ground from HC5 to HC6. 	designations therefore need removing from the policies map.	
Policy HC6: Policies Map	Objection: The whole of Kent View Recreation Ground should be designated a Local Green Space. Modification/s requested: Amend the two areas within LGS50 Kent View Recreation ground from HC5 to HC6.	The Kent View recreation ground has been designated in part as a Field in Trust. This designation was made after the Local Green Space designation was identified through evidence base work, and therefore it is agreed that an amendment to the boundary of the Local Green Space designation is justified.	
Policy HC8: Policies Map	 Objection: There is a need to cross-check the list of education facilities with the Playing Pitch Strategy. (Sport England RPLP/830). The policy map should be amended to show the changed extent of the playing field at Beauchamps School if part of the playing field is disposed of. (Sport England RPLP/830). Paragraph 13.71 should be amended to refer to legislation rather than Sports England. (Sport England RPLP/830). 	Following a review of the playing pitch strategy the Council agrees it is necessary to adjust boundary of Beauchamps School playing field. Having regard to the representation from Swan, the Council agrees it is necessary to remove HC8 education playing fields	

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	Site shown as HC8 is part of the Craylands Regeneration programme. (Swan Housing RPLP/4965).	designation on Craylands development site.	
	 Modification/s requested: There is a need to cross-check the list of education facilities with the Playing Pitch Strategy. (Sport England RPLP/830). The policy map should be amended to show the changed extent of the playing field at Beauchamps School if part of the playing field is disposed of. (Sport England RPLP/830). Remove site shown as HC8 which is part of the Craylands Regeneration programme. (Swan Housing RPLP/4965). 		
Policy HC9: Policies Map	 Objection: The Council is advocated to review the Policies Map against the private playing field sites listed in the new Playing Pitch Strategy to check that the list is accurate. For example, Wickford Town Football Club's recently built playing fields at Bartlett Park on Southend Road, Wickford are not shown on the Proposals Map or included in the list. (Sport England RPLP/831). Modification/s requested: Suggested wording changes to policy HC9 and supporting text. (Sport England RPLP/831). 	The PPS does not include mapping of private sites as suggested in order for this to occur. The policies map was accurate based on the evidence available at the time of publishing the plan for consultation.	

Appendix I: Schedule of Other Modifications

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
OM0.1	Whole plan	Whole Plan	The references to a "new junction on the A127" should be amended to "grade separated junction" throughout the Local Plan.	Amendment requested by ECC. (Representation RPLP/1719)
OM0.2	Whole Plan	Whole Plan	Replace "Traffic Impact Assessment" with "Transport Assessment" throughout the Local Plan.	Amendment requested by ECC. (Representation RPLP/1713)
OM0.3	Foreword - Bullet 14	i	The worst-case scenario reduces our Green Belt by 4% 6%. This means that 59% of the land area in Basildon remains designated as Green Belt.	Amended for accuracy.
OM0.4	Foreword - Bullet 26	ii	We may have to give up 4% 6% of our Green Belt.	Amended for accuracy.
OM2.1	Paragraph 2.14	4	The A127 is one of these key transport corridors, and therefore a specific strategy for that route has been put in place. The A127 Corridor for Growth: An Economic Plan (March 2014) is a joint strategy between Essex County Council and Southend-on-Sea Borough Council and was adopted to provide greater journey time reliability along the length of the corridor to sustain the economic	Amendment sought by ECC. (Representation RPLP/1681)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
			advantage of the A127, as well as to facilitate future growth and prosperity in the region. A similar plan is now being prepared for the A13 with Southend-on-Sea and Thurrock Borough Councils. In addition, a cross authority A127 Task Force including Essex County Council, the South Essex Authorities and the London Borough of Havering, has been established to co-ordinate transport requirements within the A127 corridor.	
OM2.2	Paragraph 2.17	4	The Essex Minerals Local Plan (2014) is a statutory Development Plan and should be read alongside the Local Plan. It identifies sites and locations for the extraction of mineral deposits mineral development within Essex. There are no identified extraction sites within Basildon Borough. However, there are deposits of sand and gravel within the Borough which are subject to a Minerals Safeguarding policy within the Minerals Local Plan. Regard should be had to the requirements of the Minerals Local Plan where a development of 5 hectares or more falls within one of these areas a Minerals Safeguarding Area. The Minerals Local Plan also defines Mineral Consultation Areas through the same policy. Any application within a Mineral Consultation Area which meets the thresholds set out in the policy will be subject to consultation with the Minerals Planning Authority to establish the impact, if any, on the relevant mineral development.	Amendment sought by ECC. (Representation RPLP/1683)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
OM2.3	Paragraph 2.18	5	Essex County Council is the waste planning authority for the Borough, and is responsible for preparing planning policies, and also for assessing applications for waste management development. The Essex and Southend-on-Sea Waste Local Plan (2017) is a statutory Development Plan which should be read alongside this Local Plan. It sets out where and how waste management developments can occur, and is the planning policy against which waste management development planning applications are assessed against. The Waste Local Plan defines Waste Consultation Areas, and any application falling within such an area will be subject to consultation with the Waste Planning Authority to establish the impact, if any, on the relevant waste development.	Amendment sought by ECC. (Representation RPLP/1683)
OM2.4	Paragraph 2.24	5	The South Essex 2050 vision identifies six main growth locations in the area, and it is now intended that the local planning authorities and Essex County Council will work together to prepare a Joint Strategic Plan for South Essex. This will be accompanied by a separate Joint Infrastructure Delivery Plan. A Memorandum of Understanding (MOU) has been developed and signed which sets out the framework for delivering a joint plan, and various shared key principles have been agreed including a protocol for engaging with each other on strategic planning matters. A Statement of Common Ground has also been agreed and signed by all seven	Amendment sought by Thurrock Council. (Representation RPLP/855)

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			partner authorities to support the Duty to Cooperate as required by national policy, initiating the formal process for preparing the JSP and setting out the project management arrangements.	
OM3.1	Topic heading for Paragraphs 3.3 to 3.5	7	Our Historic Context Environment	Amendment sought by Historic England. (Representation RPLP/2127)
OM3.2	Paragraph 3.10	9	The Borough is also served by two railway lines to the north and south. Access to these is via five railway stations: Basildon, Laindon, Pitsea, Billericay and Wickford. Rail services from Billericay and Wickford connect to Stratford City and terminate at London Liverpool Street. In 20182019, Crossrail services will be fully operational from Shenfield, one stop west of Billericay, linking non-stop with Maidenhead and Heathrow Airport, via Central London. In the south of the Borough, rail services run between London Fenchurch Street and Shoeburyness with services to Lakeside Shopping Centre and Dagenham, via a junction at Pitsea.	Amendment sought by ECC. (Representation RPLP/1686)
OM3.4	Paragraphs 3.15 to 3.18	10	3.15 At 2017, the Commissioning School Places team at Essex County Council recorded 51 primary schools, 10 secondary schools and 6 sixth forms in the Borough. Education is an important part of life for children. Since	Amendment sought by ECC.

Reference Paragraph/Policy/F Number able/Map Refere	Proposed Change	Reason for Change
	the laws changed in 2013, all young people must now stay in some form of education or training until they are at least 18 years old. 3.16 Educational attainment in both primary and secondary level is slightly lower than the East of England and England averages. The 2011 Census also showed that the skills level amongst adult residents is also low. Only 17% of resident workers are qualified to NVQ4 and above, and 40% hold only NVQ1 or no qualifications at all. Early years provision in the borough comprises an array of maintained, private, voluntary and independent settings offering a range of services including childcare, schooling, learning, family support and early intervention, for children from birth to at least seven years of age. Essex County Council has a duty to provide enough childcare places for all working parents and those who are looking for employment. 3.17 Key to improving this situation has been to tackle the quality of educational provision in the Borough. In Autumn 2013 Essex County Council, Basildon Borough Council and the Basildon Education Partnership Trust agreed with 35 Basildon schools to form a partnership panel of local authorities and School Leaders to support one another	(Representation RPLP/1689)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
			and work together more effectively. By August 2015, this had led to the merger of separate infant and junior schools into primaries, the creation of a new teaching school and the raising of standards at all schools ensuring none remain being classed as inadequate by Ofsted. At 2017, the Commissioning School Places team at Essex County Council recorded 51 primary schools, 10 secondary schools and 6 sixth forms in the Borough. Educational attainment in both primary and secondary level is slightly lower than the East of England and England averages. The 2011 Census also showed that the skills level amongst adult residents is also low. Only 17% of resident workers are qualified to NVQ4 and above, and 40% hold only NVQ1 or no qualifications at all.	
			3.18 Higher education opportunities existing at some of the Borough's secondary Academies, as well as with the South Essex College, SEEVIC and ProCAT colleges which have skills campuses in the Borough.	
			3.19 Some children require a more specialised setting either in a special school, or in mainstream schools with Special Educational Needs (SEN) unit or resourced provision. There are currently 2 special schools in the	

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
			borough, and 5 mainstream schools with an SEN unit or resourced provision.	
OM4.1	Paragraph 4.2	12	The population of the Borough is expected to grow substantially over the next 20 years. A significant driver of this growth will be natural change in the population i.e. babies being born birth and death rates. This alone gives rise to the need for an extra 770 homes per year within the Borough over the plan period. Basildon is also an attractive location for people moving out of London to raise a family, which given its history as a Mark 1 New Town is not surprising, as it was designed for such a population. Migration from elsewhere in England, primarily London, along with market signals and likely job growth gives rise to the need for between 1,019-1,033 homes per annum over the plan period.	Amendment sought by resident.
OM4.2	Paragraph 4.15 – 3 rd Bullet	14	London Southend Airport – This airport has received significant investment since 2010, and now operates commercial flights to a number of destinations across Europe, including regional flights to Dublin that enable onward connection to destinations in the USA. The London Southend Airport and Environs Joint Area Action Plan (2014) anticipates that the airport will be dealing with 2 million passengers a year by 2030, and that the surrounding area will be developed for airport related businesses creating around 6,000 jobs.	Amendment sought by ECC. (Representation RPLP/1690)

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Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
OM4.3	Paragraph 4.15 – 6 th Bullet	15	The Lower Thames Crossing - A preferred route for this crossing has been identified by the Government running through the neighbouring Thurrock Borough to the M25, between junctions 29 and 30. It will have a junction with the A13 to the west of the current Orsett Cock junction (A13/A128). This therefore presents economic opportunities, but will need to be managed carefully in order to ensure it does not have negative consequences for the local highway network and/or land values. Following statutory consultation in 2018 on design changes to the preferred route, a Development Consent Order (DCO) application is scheduled to be submitted to the Planning Inspectorate in 2019.	Amendment sought by ECC. (Representation RPLP/1690)
OM4.4	Paragraph 4.15 – 6 th Bullet	15	The Lower Thames Crossing - A preferred route for this crossing has been identified by the Government running through the neighbouring Thurrock Borough to the M25, between junctions 29 and 30. It will have a junction with the A13 to the west of the current Orsett Cock junction (A13/A128). This therefore presents economic opportunities, but will need to be managed carefully in order to ensure it does not have negative consequences for the local highway network and/or land values. Potential impacts will also need to be managed for the wider highway network in the surrounding area, including strategic routes. Following statutory consultation in 2018 on design changes to the preferred route, a Development	Amendment sought by Transport for London. (Representation RPLP/1868)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
			Consent Order (DCO) application is scheduled to be submitted to the Planning Inspectorate in 2019.	
OM5.1	Paragraph 5.2 - Education and Skills – 3 rd bullet	16	To attract <u>high quality</u> , qualified and motivated <u>professionals including</u> teachers that <u>who</u> are flexible to meet the needs of learners;	Amendment sought by ECC. (Representation RPLP/1691)
OM5.2	Paragraph 5.3 – SO1 – Second Point	17-18	Protect, enhance, conserve, increase and positively manage the Borough's biodiversity resources through the protection, enhancement, restoration and creation of habitats and green and blue infrastructure opportunities to achieve a net measurable gain in biodiversity.	Amendment sought by Essex Wildlife Trust. (Representation RPLP/1830)
OM5.3	Paragraph 5.3 – SO3 – First Point	18	Promote the efficient use of resources by embracing sustainable patterns of development including maximising the use of previously developed land, improving energy and water efficiency, increasing the use of renewable energy technologies and minimising pollution including greenhouse gas emissions air, noise, water and light pollution.	Amendment sought by resident.
OM5.4	Paragraph 5.3 – SO3 – Third Point	18	Ensuring people can be protected from the effects of flooding by identifying reasonable and accountable standards to meet the preventive approach to mitigate flood risk.	Amendment sought by ECC and resident. (Representation RPLP/1692)

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Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
OM5.5	Paragraph 5.3 – SO5 – First Point	18	Maintain the Borough's position as a sub-regional economic hub by providing enough land in suitable locations whilst recognising physical and environmental constraints, with supporting infrastructure to accommodate business needs, both big and small, and support the diversification of the Borough's employment sector mix.	Amendment sought by resident.
OM5.6	Paragraph 5.3 – SO6 – First Point	18	Identify enough suitable land for new housing to meet Objectively Assessed Needs, whilst recognising the challenges to do so in respects of physical and environmental constraints and infrastructure phasing.	Amendment sought by Southern and Regional Development Ltd. (Representation RPLP/2083)
OM5.7	Paragraph 5.3 – SO8	18	Ensure access to leisure, sport, green and blue space, recreation and cultural facilities is maintained for all user groups to encourage active and healthier lifestyles.	Amendment sought by Essex Bridleways Association. (Representation RPLP/355)
OM5.8	Paragraph 5.3 – SO10 – Second Point	19	Promote a reduction in car use and out commuting where possible and encourage the use of public transport, walking and cycling to minimise the impact of the Borough's growth on transport infrastructure, by improving connectivity between the sustainable transport	Amendment sought by ECC. (Representation RPLP/1693)

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			housing market areas to accommodate any unmet need arising through this plan.	
OM6.2	Paragraph 6.18	22	Significantly boosting the supply of housing in England is a key focus for the Government, and local planning authorities are expected to identify their local housing need and make sufficient provision to meet this need in their Local Plans. meet this objectively assessed need in full for market and affordable housing.	Clarification which addresses concerns raised by a resident.
OM6.3	Paragraph 6.30	24	"The Local Plan can do little more than recognise the need for improvements to strategic infrastructure, such as the A127, A13 and A130 and two railway lines, to support the cumulative impacts of growth in South Essex_in combination with sustainable transport solutions. The Joint Strategic Plan will therefore provide a new opportunity for infrastructure to be considered at a strategic level, rather than just at a local level, and consequently, different approaches to infrastructure provision may be identified in the future. This may give rise"	Clarification which addresses concerns raised by ECC. (Representation RPLP/1694)
OM6.4	Paragraph 6.37	26	Sites which potentially risked the coalescence of Basildon urban area with Thundersley to the east and West Horndon to the west were considered to cause significant harm to the openness of the Green Belt and the purposes of including land within it, and have therefore been	Clarification which addresses concerns raised by CODE Development Planners

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OM6.7	Policy SD2 – Point 1	28 - 29	Table Row - Green Belt Infill - 145 163 Table Row - TOTAL - 17,773 17,791	Amendment to discrepancy raised by Countryside Properties (UK) Ltd. (Representation RPLP/1317)
OM6.8	Policy SD2 – Point 4	28 - 29	4. "To ensure that new development is sustainable, new homes within these areas should be accompanied by supporting strategic and local infrastructure including as set out in E6, T2 and H11, including highways, open spaces, community facilities and local services."	Clarification which addresses concerns raised by ECC. (Representation RPLP/1701)
OM6.9	Paragraph 6.61	31	"but there remains a need for a further 1,350 additional dwellings, with supporting infrastructure, to be provided on the remaining land to the east of Basildon."	Clarification which addresses concerns raised by ECC. (Representation RPLP/1703)
OM6.10	Policy SD3 – Point 3	33	"3. The Bowers Gifford and North Benfleet, and Ramsden Bellhouse Neighbourhood Areas are allocated the following minimum housing targets and any necessary strategic and local infrastructure, which must be delivered through their respective Neighbourhood Plans"	Clarification which addresses concerns raised by ECC. (Representations RPLP/1703 & RPLP/1706)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
OM7.1	Policy E1 - Point 1	37	1. As part of the Local Plan's objective to deliver at least 20,000 additional jobs, the Council will seek to deliver at least 14,150 additional B-Class full time equivalent jobs and associated employment generating sui generis uses within the Borough over the period of this plan through sustainable growth of the local economy, supported by the provision of a flexible supply of employment land and premises to meet the varying needs of different B-class economic sectors. This will be achieved by:	Amendment requested by ECC. (Representation RPLP/1709)
OM7.2	Policy E3	39	 8ha of land at Dunton, as identified on the Policies Map, will be safeguarded for employment purposes falling within use class B1 (a) and (b) and ancillary employment, commercial and leisure developments. The test track associated with the Ford Technical Centre, will be protected specifically for the purposes of automotive research and development purposes only. 1.8ha of land to the north and west of the test track will be protected for any appropriate proposals falling within use class B1 (a) and (b). 	Amendment sought by Ford Motor Company to allow for complementary land uses within site. (Representation RPLP/1999)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
			4. The Council will work with Ford to develop a Local Development Order (LDO.	
				Amendment requested by Ford Motor Company. (Representation RPLP/1998)
OM7.3	Policy E5 - Part d	41	d. Employment proposals are subject to a Traffic Impact Transport Assessment to establish what mitigation is required to the local or strategic highway network to enable the development to take place; and	Amendment requested by ECC. (Representation RPLP/1713)
OM7.4	Paragraph 7.37	42	It is expected that this capacity will be provided through the provision of a new grade separated junction on the A127/Pound Lane and Cranfield Park/Tresco Way, which will also serve housing development to the east of Basildon and across Wickford	Clarification which addresses concerns raised by ECC. (Representation RPLP/1733)
OM7.5	Paragraph 7.38	42	It is expected that all of the remaining need for employment land that cannot be met from other allocations, or the intensification of uses within Existing Employment Areas is met in this location. Given its proximity to the existing residential areas of Pitsea to the south, and new housing development proposed between Pitsea and Bowers Gifford in policy H11 and the 1,350	Amendment sought by ECC to reflect all future residential development in the area around Policy E6. (Representation RPLP/1717)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
OM7.9	Policy E6 insert new text after point 1c and renumber existing 1d to 1e	43	d. The design and layout of development must respect the setting of designated historic assets surrounding the site including several Grade II listed buildings.	Amendment requested by Historic England. (Representation RPLP/2147 and RPLP/2132)
OM7.10	Policy E7 - Point 1	44	1. To support the rural economy and provide greater flexibility to the employment land supply, the following existing Rural Enterprise Sites, as identified on the Policies Map, will be retained for B-class employment purposes and associated employment generating suigeneris uses as appropriate to their location:	Amendment requested by ECC. (Representation RPLP/1720)
OM8.1	Paragraph 8.35	55	To support the regeneration of Basildon Town Centre, the Council have identified a minimum dwelling capacity of 1,036 units (see policy SD2) within the boundaries of the town centre through the latest <i>HELAA</i> and maximising densities. This corresponds with the opportunity to deliver up to around 2,128 homes which is based on the 1,500 to 2,000 homes outlined in the <i>Basildon Town Centre Masterplan</i> , which itself covers a larger area than the defined town centre, and an uplift of 6.4% based on higher density residential development being delivered historically than originally anticipated within the <i>Masterplan</i> , as set out in the <i>Town Centre</i>	Minor amendment to provide flexibility regarding residential development, as requested by Arcadis and Infrared. (Representations RPLP/2130 & RPLP/2200)

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			forecourt of the train station have improved accessibility for buses and provided new cycle storage which contributes positively to promoting sustainable transport.	(Representation RPLP/1724).
OM8.4	Paragraph 8.61	60	Whilst the town centre has a high quality environment with interesting architectural diversity, the <i>Basildon Retail and Commercial Leisure Capacity Study</i> did identify there being very few public spaces and an over dominance of traffic. There is a need to ensure the ongoing success of Billericay Town Centre by considering opportunities to improve the public realm, particularly for pedestrians by promoting the use of, and improvements to, sustainable transport including public transport, and to ease capacity issues on the road network.	Minor amendment to reflect the most up to date evidence available, as requested by ECC. (Representation RPLP/1725).
OM8.5	Paragraph 8.118	71	The Hot Food Takeaway Assessment (2015) draws together information about the impact of hot food takeaway shops in Basildon and provides the evidence base for this policy. The report details the national and local health concerns, associated existing evidence and how this policy can support health improvements. The report also supports the requirement for all applications relating to development falling with the A5 use class to be accompanied by Health Impact Assessments, which is stipulated within Policy HC1.	Minor amendment to reference the requirement of Health Impact Assessments, as requested by ECC. (Representation RPLP/1727).

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Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
OM8.6	Paragraph 8.119	71	Obesity prevalence in the Borough is significantly greater than regional and national rates according to the Basildon Joint Strategic Needs Assessment (JSNA) (2012/2018) produced to support Clinical Commissioning Groups (CCG). The Basildon and Brentwood CCG has identified within their Strategic Prevention Implementation Plan 2014-2019 a need to focus on some actions to reduce obesity within the area, and considers that planning services in the Borough may have a role to play in reducing obesity through better control of the location, prevalence and proliferation of hot food takeaways. There is therefore scope, within the context of national planning policy and wider policy related to health and well-being, to consider the role the local plan could play in reducing obesity.	Minor amendment to reflect the most up to date evidence available, as requested by ECC. (Representation RPLP/1727).
OM8.7	Insert new paragraph after Paragraph 8.97	67	8.98 The southern part of the land adjacent to Basildon Golf Course is wooded and forms part of the wider Vange Hill and Golf Local Wildlife Site. In accordance with policy NE3 the Council will support proposals that seek to maintain and enhance biodiversity within the local designation but where this is not possible appropriate mitigation in accordance with policy NE4 will be required.	Minor amendment to better reflect the findings of the Sustainability Appraisal, as requested by Natural England. (Representation RPLP/2549).

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Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
OM8.8	Amend Policy R13 - Point 1, parts e and f	67	e. The design, scale, massing and layout of the proposal is sympathetic to the character of the surrounding area. including the setting of any listed buildings, and should be no taller than four storeys; and f. All other relevant policies in this plan have been complied with, in particular, those policies in chapter 16 of this plan with regards to biodiversity within the area designated as a Local Wildlife Site.	Minor amendment to ensure the setting of a nearby listed building is considered, as requested by Historic England. (Representation RPLP/2150) Minor amendment to better reflect the findings of the Sustainability Appraisal, as requested by Natural England. (Representation RPLP/2549).
OM9.1	Paragraph 9.7	75	Whilst Essex County Council is the local Highway Authority for Basildon, and also Castle Point and Rochford, Southend-on-Sea and Thurrock are both unitary authorities responsible for their own highway matters. Consequently, transport planning in South Essex requires a greater degree of coordination than in other areas. Joint working through the South Essex Growth Partnership, and previously through the Thames Gateway	Clarification which addresses concerns raised by ECC. (Representation RPLP/1728)

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			South Essex Partnership, Opportunity South Essex, South Essex Active Travel Partnership and the Association of South Essex Authorities (ASELA) helps to provide this coordination, and also helps to identify infrastructure investment priorities for the area which help to support growth and the delivery of strategic infrastructure projects in the wider area. More recently, a Task Force of local MPs and Council Leaders has been set up to work together and contribute towards a long-term vision for the A127 economic growth corridor. A Strategic Transport Board has been established for South Essex which also includes private sector transport providers such as the rail operators, the ports and the airport. There is also ongoing engagement with bus operators. This interaction with the private sector is important for delivering improvements to sustainable transport modes.	
OM9.2	Paragraph 9.10	75	Whilst Essex County Council is the local Highway Authority, Highways England is responsible for the strategic highway network including the M25 and parts of the A13 in the neighbouring Borough of Thurrock. Following a route consultation which took place from 26 January to 24 March 2016, in April 2017 the Secretary of State for Transport announced the preferred route for a Lower Thames Crossing, a tunnel under the River	Clarification which addresses concerns raised by ECC and Thurrock Council. (Representations RPLP/1730 & RPLP/856)

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			Thames east of Gravesend and Tilbury (Location C, route 3 with the Western-Southern Link) Subject to the outcome of a second public consultation on the scheme design held at the end of 2018, the application for the Development Consent Order will be submitted to the Planning Inspectorate's National Significant Infrastructure Project in 2019, with approval expected in late 2020 or early 2021. The Lower Thames Crossing is then expected to open to traffic in 2027 subject to planning consent and finance arrangements.	
OM9.3	Paragraph 9.11	75	At a local level, the Borough's Community Strategy aligns with the NPPF, and the Essex Transport Strategy, and the public transport mitigation measures referenced within the Publication Local Plan THIA 2018 report in so far as it envisages greater use of sustainable modes of transport. This, coupled with the delivery of high quality public transport as the main way of getting around the Borough, will help to reduce congestion and give people easier access to schools, jobs, shops, health and other facilities. This includes addressing the well-known lack of public transport provision to the A127 Corridor, which provides a number of these key facilities.	Clarification which addresses concerns raised by ECC and Bowers Gifford & North Benfleet Parish Council. (Representations RPLP/1732, RPLP/3697 & RPLP/3698)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
OM9.4	Paragraph 9.19	76	A significant proportion of this cost is associated with the provision of a new grade separated junction on the A127/Pound Lane and Cranfield Park Road/Tresco Way to provide access to new development in Wickford and East Basildon, and also provide congestion relief on the route into Wickford on the A132	Clarification which addresses concerns raised by ECC. (Representation RPLP/1733)
OM9.5	Paragraph 9.20	77	In addition to the strategic highway mitigation schemes identified to keep the main road network moving and safe, it will be necessary for individual development schemes to make localised improvements to the road network, and to sustainable transport including public transport as references in Section 9 of the Publication Local Plan THIA 2018, to ensure safe and sustainable access to development sites.	Clarification which addresses concerns raised by ECC. (Representation RPLP/1734)
OM9.6	Paragraph 9.21	77	In terms of sustainable transport modes, the Council has worked with Essex County Council to develop a local Cycling Strategy, as part of its duties under the Education Act 1996. A strategic approach to cycling is essential to get more people using cycling as a travel choice, bringing wider travel, health and well-being benefits. Within Basildon (including Laindon and Pitsea) there is a well-developed network of cycleways, which were installed through the development of the New Town, but this is not the case in Billericay and Wickford to the north. Despite this, the proportion of people travelling to work by bicycle	Clarification which addresses concerns raised by ECC. (Representation RPLP/1736)

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			is below the national average. It is therefore necessary to deliver improvements to the existing network and secure parking facilities within new development to increase participation. In addition to the Essex Cycling Strategy (Nov 2016) and the Basildon Borough Cycling Action Plan (Nov 2017), strategies including ECC Sustainable Modes of Transport Strategy (Aug 2016) and the work of South Essex Active Travel will also provide improvements to and incentives for the use of more sustainable modes of transport.	
OM9.7	Paragraph 9.22	77	In terms of public transport provision, the Basildon Integrated Transport Package will deliver public transport improvements within the Borough around bus and railway stations. Similarly, Basildon Council in partnership with Essex County Council and Greater Anglia rail franchise plan to improve public transport integration around Billericay and Wickford railway stations. The Local Plan will expect new developments to include provision for sustainable modes of transport including public transport as part of the highway and transportation mitigation measures identified in the Basildon Local Plan policies and/or accompanying Transport Assessments. The opportunity for public transport provision is expected to be extended into new developments where practical to encourage the use of this travel mode. The ongoing engagement of bus and rail operators will be necessary	Clarification which addresses concerns raised by ECC. (Representation RPLP/1737)

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			for these improvements to successfully be delivered in a way that influences an overall modal shift.	
OM9.8	Policy T1 – Part b	77	b. Working with businesses, developers and community service providers to improve accessibility to key services and facilities through the use of travel plans, and to ensure that new premises and, facilities and residential developments are readily accessible by sustainable modes of travel	Clarification which addresses concerns raised by ECC. (Representation RPLP/1738)
OM9.9	Policy T1 – Part d. ii.	77	d. ii. Targeted investment to improve local transport infrastructure, focusing on delivery of improved and better integrated bus and train services, and improved multiuser routes including pedestrian and cycling networks;	Clarification which addresses concerns by Essex Bridleways Association. (Representation RPLP/360)
OM9.10	Section Header for Policy T2	78	Policy T2: Improvements to Carriageway Highway Infrastructure. All other references to carriageway infrastructure will be changed to highway infrastructure.	Clarification which addresses concerns raised by ECC. (Representation RPLP/1739)
OM9.11	Paragraph 9.26	78	The Essex Transport Strategy, the A127 Corridor for Growth: An Economic Plan, and future route based strategy for the A13, propose a number of highway	Clarification which addresses concerns raised by ECC.

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			schemes for the Borough, in order to address issues with the existing highway network's capacity and resilience. It should be noted that whilst funding has been secured for some of these improvements, some others will be the subject of future bids and will be brought forward as part of a range of transport packages including sustainable transport and public transport packages.	(Representation RPLP/1741)
OM9.12	Paragraph 9.31	79	Ongoing work between BBC and ECC is being undertaken in relation to the UK Air Quality Action Plan for Nitrogen Dioxide, which is particularly relevant at this junction, as national modelling indicates the potential for Nitrogen Dioxide levels to exceed European limits in this location.	Clarification which addresses concerns raised by ECC. (Representation RPLP/1743)
OM9.13	Paragraph 9.32	79	A new grade separated junction on the A127 at Pound Lane: This junction is required to serve the development proposed to the east of Basildon (policies E6 and H11) and in Wickford (policies H12, H13, H14 and H15) and for development coming forward as part of the Bowers Gifford & North Benfleet Neighbourhood Plan as set out in policies SD2 and SD3. These sites combined will provide around 5,000 homes and over 3,300 jobs. The new junction will also improve access to the A127 Enterprise Corridor by providing a new easterly access point, reducing pressure at the A132 Nevendon Interchange. It will also reduce flows north-south along	Clarification which addresses concerns raised by ECC. (Representation RPLP/1745)

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			the A132 through Wickford, reducing congestion at junctions through the town and freeing up capacity for local traffic. This junction will provide significant benefits, including a link road from Pound Lane to Cranfield Park Road/Tresco Way in Wickford to the north, to Courtauld Road and the employment Corridor to the west, and from Pound Lane to the B1464 to the south. above and beyond those, which can be offered by alternative rejected proposals such as widening of the Nevendon Road (A132) northbound, and the provision of a northbound spur between the A127 and the A130 closer to the A127/A130 Fairglen Interchange. However, this proposal is substantially more expensive, and will require support from neighbouring authorities and funding support to supplement developer contributions from the SELEP/DfT.	
OM9.14	Paragraph 9.33	79	A relief route to the south/south-west of Billericay, between Laindon Road and the A129 London Road: Currently traffic accessing the west of Billericay must travel through the southern part of the historic Billericay Town Centre. Junctions in this location experience capacity issues. It is proposed that sine roads are provided running through site H17 to provide an alternative full multi-user route to the west, avoiding the town centre.	Clarification which addresses concerns by Essex Bridleways Association. (Representation RPLP/356)

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OM9.15	Paragraph 9.33	79	It is expected that The costs of this route will be met by developers as they bring forward their sites for development	Clarification which addresses concerns raised by resident.
OM9.16	Paragraph 9.36 (list)	80	 A13 Haywain junction, Vange A176/Dry Street Interchange, Basildon (in delivery 2018) Cranes Farm Road/A176 Upper Mayne/St Nicholas Lane junction, Basildon A127/A176 Pipps Hill Noak Bridge Interchange North & South, Basildon B1464 London Road/High Road/Clay Hill Road, Basildon A13/A176 Five Bells Interchange North & South, Basildon A13/A132 Pitsea Interchange, Basildon A129/Mountnessing Road/London Road roundabout, Billericay B1007/A129 Sun Corner junction, Billericay B1007/Norsey Road/High Street/Norsey Road/Western Road, Billericay A129/Southend Road/Outwood Common Road, Billericay A129/Southend Road/Hickstars Lane, Billericay A129/Southend Road/Hickstars Lane, Billericay A129/Southend Road/A132 junction, Wickford 	Clarification which addresses concerns raised by ECC. (Representations RPLP/1740)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
			 A1245/Chelmsford Road/A129 London Road, Wickford A132/Golden Jubilee Way/Radwinter Avenue/A129 London Road, Wickford A129/London Road/Nevendon Road/High Street, Wickford 	
OM9.17	Paragraph 9.39	80	Add para after 9.39 It will also be necessary to adopt safeguards to ensure the protection and enhancement of the historic environment, where appropriate, at an early stage of development of these projects in order to identify suitable mitigation against any negative impacts that may arise.	Clarification which addresses concerns by Historic England. (Representation RPLP/2151)
OM9.18	Policy T2 – Point 1	80 - 81	In order to manage congestion and reduce the effects of pollution on key routes, and at key junctions within the Borough, the Council will work with SELEP, Essex County Council and developers to secure the following improvements and alterations to carriageway infrastructure in the Borough, alongside new development, during the plan period up to 2034: Improvements to the A127/A130 Fairglen Interchange;	Clarification which addresses concerns raised by ECC. (Representations RPLP/1740 & RPLP/1746)
			Borough, the Council will work with SELEP, Essex County Council and developers to secure the following improvements and alterations to carriageway infrastructure in the Borough, alongside new development, during the plan period up to 2034: a. Improvements to the A127/A130 Fairglen	raised (Repre RPLP

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
			 c. Improvements to the A176 Upper Mayne junction with the A127; d. Improvements to the A13 in line with the A13 Route Management Strategy; e. Improvements to the A127/High Road 'Fortune of War' junction; f. the provision of a new grade separated junction on the A127 at Pound Lane, including a link road to Cranfield Park Road/Tresco Way; and a link road to the B1464.; g. The provision of a south/south-west relief route for Billericay alongside new housing development; h. The provision of a link road from West Mayne to site H8, providing multi-modal connections to Laindon Town Centre; i. Modifications to the Basildon Town Centre road network in line with the Basildon Town Centre Masterplan; j. Various individual improvement schemes: i. A13 Haywain junction, Vange ii. A176/Dry Street Interchange, Basildon (in delivery 2018) iii. Cranes Farm Road/A176 Upper Mayne/St Nicholas Lane junction, Basildon iv. A127/A176 Pipps Hill Noak Bridge Interchange North & South, Basildon 	

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			v. B1464 London Road/High Road/Clay Hill Road, Basildon vi. A13/A176 Five Bells Interchange North & South, Basildon vii. A13/A132 Pitsea Interchange, Basildon viii. A129/Mountnessing Road/London Road roundabout, Billericay ix. B1007/A129 Sun Corner junction, Billericay x. B1007/Norsey Road/High Street/Norsey Road/Western Road, Billericay xi. A129/Southend Road/Outwood Common Road, Billericay xii. A129/Southend Road/Hickstars Lane, Billericay xiii. A132/Runwell Road/A132 junction, Wickford xiv. A1245/Chelmsford Road/A129 London Road, Wickford xv. A132/Golden Jubilee Way/Radwinter Avenue/A129 London Road, Wickford xvi. A129/London Road/Nevendon Road/High Street, Wickford	
OM9.19	Policy T2 – Point 3	81	3. Detailed assessment of the potential impact of any new or improved transport scheme on the historic or natural environment, including SSSI and adjacent Local Wildlife Sites will be required, and where adverse effects are	Clarification which addresses concerns by Historic England. (Representation RPLP/2151)

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			predicted, appropriate mitigation will need to be identified and undertaken.		
	Policy T3 – Point 2	83	 2. The Council will work with partners including Essex County Council to secure the funding necessary to deliver the infrastructure improvements, including necessary public realm and landscaping, set out in the Essex Transport Strategy, Public Rights of Way Improvement Plan and the Basildon Cycling Action Plan. It will also expect development proposals to support their implementation by: a) Retaining and improving any existing foot paths, footways, cycleways, bridleways and other Public Rights of Way passing through or adjacent to their site; b) Providing additional multi-user routes footpaths, eycleways and bridleways which link up with the existing network and address any gaps in the network, thereby providing access to nearby residential, commercial, retail, education and leisure opportunities, as well as access to the countryside; c) Providing facilities for multi-user routes including pedestrians, and cyclists access, equestrians and the disabled, including the provision of cycle parking, in both residential development and non-residential development; and 	Clarification which addresses concerns raised by ECC and Essex Bridleway Association. (Representations RPLP/1748 & RPLP/361)	

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			d) Contributing to facilities for pedestrian and cycle access at nearby public transport hubs.	
OM9.21	Paragraph 9.56	84	There is also an opportunity to take advantage of the benefits of the new Elizabeth Line, being delivered by the Crossrail project. It is a new pan-London non-stop rail service which will be operating from Shenfield in the neighbouring Borough of Brentwood from December 2018. This is only one stop westwards from Billericay on the existing Greater Anglia mainline. In 2019, Crossrail services will be fully operational from Shenfield, one stop west of Billericay, linking with Maidenhead and Heathrow Airport, via Central London. The Elizabeth Line will open up the opportunity for people travelling to, or through London to take the train from Wickford and Billericay and connect to Crossrail services at Shenfield, with faster, more frequent and smoother services through London without the need to change trains.	Clarification which addresses concerns raised by ECC, Transport for London and residents. (Representations RPLP/1749, RPLP/1869, RPLP/2687 & RPLP/4601)
OM9.22	Policy T4 – Point 4	85	4. Expect development proposals to, where appropriate, support the establishment of new public transport services for their occupants/users, and be designed to meet the needs of public transport operators and users. In particular, where appropriate, proposals should have regard to the following objectives to support this: a. Road layouts should accommodate direct, convenient and safe bus routes;	Clarification which addresses concerns by multiple developers. (Representations RPLP/1870, RPLP/1872, RPLP/1930, RPLP/1961,

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			 b. Bus priority measures and parking restrictions which enable the safe passage of buses should be implemented, where necessary; c. The layout of development should ensure all any homes and or other frequently accessed forms of development are within 400m of a bus stop; and d. Bus waiting facilities should be suitably sheltered, have good pedestrian and disabled access and benefit from passive surveillance. 	RPLP/2074 & RPLP/2213)
OM9.23	Paragraph 9.63	85	A number of projects identified in policies T2, T3 and T4 as identified in the Essex Transport Strategy and the Publication Local Plan THIA require land to be made available to enable transport improvements to take place in the future. In particular, these include:	Clarification which addresses concerns raised by ECC. (Representation RPLP/1752)
			 Improvements to the A127/A130 Fairglen Interchange; Widening of the A127 in line with the A127 Corridor for Growth: An Economic Plan; Improvements to the A132 Nevendon junction; Improvements to the A176 Upper Mayne junction with the A127; Improvements to the A13 in line with the A13 Route Management Strategy; Improvements to the A127/High Road 'Fortune of War' junction; 	

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			 The provision of a new grade separated junction on the A127 at Pound Lane, including a link road to the A130; The provision of a south/south-west relief route for Billericay alongside new housing development; The provision of a link road from West Mayne to site H8, providing multi-modal connections to Laindon Town Centre; Modifications to the Basildon Town Centre road network in line with the Basildon Town Centre Masterplan; Various individual improvement schemes: A13 Haywain junction, Vange A176/Dry Street Interchange, Basildon (in delivery 2018) Cranes Farm Road/A176 Upper Mayne/St Nicholas Lane junction, Basildon A127/A176 Pipps Hill Noak Bridge Interchange North & South, Basildon B1464 London Road/High Road/Clay Hill Road, Basildon A13/A176 Five Bells Interchange North & South, Basildon A13/A132 Pitsea Interchange, Basildon A129/Mountnessing Road/London Road roundabout, Billericay 	

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			 B1007/Norsey Road/High Street/Norsey Road/Western Road, Billericay A129/Southend Road/Hickstars Lane, Billericay A132/Runwell Road/A132 junction, Wickford A1245/Chelmsford Road/A129 London Road, Wickford A132/Golden Jubilee Way/Radwinter Avenue/A129 London Road, Wickford A129/London Road/Nevendon Road/High Street, Wickford 	
OM9.24	Paragraph 9.63	85	A number of projects identified in policies T2, T3 and T4 as identified in the Essex Transport Strategy, ECC Sustainable Modes of Travel Strategy, and the Publication Local Plan THIA require land to be made available to enable transport improvements to take place in the future.	Clarification which addresses concerns raised by ECC. (Representation RPLP/1754)
OM9.25	Paragraph 9.64	85	It is important that the land requirements of these transport improvement projects are taken into account when assessing development proposals in order to ensure that the development does not prevent necessary highway improvements from occurring, reducing their effectiveness, causing severance between communities,	Clarification which addresses concerns by Essex Bridleways Association. (Representation RPLP/357)

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			or substantially increasing the cost of delivering such a project.	
OM9.26	Paragraph 9.65	86	Detailed assessment of the potential impact of any new or improved transport scheme on the historic or natural environment, including SSSI and adjacent Local Wildlife Sites will be required, and where adverse effects are predicted, appropriate mitigation will need to be identified.	Clarification which addresses concerns by Historic England. (Representation RPLP/2152)
OM9.27	Paragraph 9.69	87	The NPPF stipulates that all development which generate significant amounts of transport movement should be supported by a Transport Statement or Transport Assessment and should be required to provide a Travel Plan, which includes Travel Plans for business, residential and schools	Clarification which addresses concerns raised by ECC. (Representation RPLP/1755)
OM9.28	Policy T6 – Point 1	87	1. All development proposals that are likely to generate significant amounts of movements must be accompanied by a Transport Statement or Transport Assessment and a Travel Plan.	Clarification which addresses concerns raised by ECC. (Representation RPLP/1756)
OM9.29	Policy T6 – Point 2	87	2. The assessment/statement must demonstrate how the impacts of the development on the highway network will be mitigated to limit significant effects on highway and junction capacity in order to satisfy the requirements of the Highway Authority. Where a site is located close to	Clarification which addresses concerns raised by Chelmsford City Council.

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			the borough boundary, or may have transport implications beyond the borough boundary by virtue of its scale, the Transport Assessment/Statement must consider the transport implications and mitigation measures (where appropriate) necessary in the adjoining local planning authority areas.	(Representation RPLP/1644)
OM9.30	Paragraph 9.75	88	Ongoing work between BBC and ECC is being undertaken in relation to the UK Air Quality Action Plan for Nitrogen Dioxide, which is also relevant in the Borough, as national modelling indicates the potential for Nitrogen Dioxide levels to exceed European limits on the A127 at the Fortune of War junction. Congestion management has a role to play in addressing that issue.	Clarification which addresses concerns raised by ECC. (Representation RPLP/1757)
OM9.31	Paragraph 9.76	89	Promoting a safe travelling environment is important to the delivery of the Essex Transport Strategy, which highlights that in order to promote greater public transport use or healthier travel choices such as walking or cycling, we need to make sure that people will be safe when travelling. This also applies to other users such as equestrians or the disabled	Clarification which addresses concerns by Essex Bridleways Association. (Representation RPLP/362)
OM9.32	Policy T7 – Point 4	89	4. Where a development requires a Transport Assessment or Transport Statement it must also be accompanied by a Travel Plan, setting out how sustainable travel behaviours will be encouraged. This	Clarification which addresses concerns raised by ECC. (Representations

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			should have regard to the ECC Sustainable Modes of Travel Strategy, which contains different thresholds for Travel Plans to the thresholds for Transport Statements or Transport Assessments as referenced in the ECC Development Management Policies. In relation to residential developments, particular regard should be given as to how residents will access the nearest primary and secondary school provision by foot a range of sustainable modes of transport other than the private car, ensuring that the route is safe and convenient.	RPLP/1758 & RPLP/1759)
OM9.33	Paragraph 9.80	90	The NPPF allows states that if local planning authorities to are setting local parking standards for residential and non-residential development policies taking should take into account:	Clarification which addresses concerns by a resident.
OM9.34	Paragraph 9.81	90	The Essex Parking Standards – Design and Good Practice (2009) currently sets out vehicle parking standards for Essex taking into account those matters identified in national policy. It is considered that these parking standards, or any subsequent future iteration of these standards are appropriate in the Borough because they promote minimum requirements for parking for residential developments, but maximum requirements for parking in non-residential developments and is consistent with the approach taken with other authorities in Essex. Any application of these standards will need to consider	Clarification which addresses concerns raised by ECC. (Representation RPLP/1760)

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			the requirements for electric vehicle charging standards as set out in Policy H10 of this plan.	
OM9.35	Policy T8 – Point 2	90	2. Locations that are considered to be more sustainable and well served by public transport may be considered appropriate for lower levels of car parking provision.	Clarification which addresses concerns by Arcadis and a resident. (Representation RPLP/2204)
OM9.36	Paragraph 9.87	91	The Council will continue to promote sustainable forms of travel through policy and by working in partnership with providers, with particular regard to the provision of and improvements to sustainable transport, as set out in the ECC Sustainable Modes of Travel Strategy	Clarification which addresses concerns raised by ECC. (Representation RPLP/1761)
OM9.37	Paragraph 9.99	92	Such an approach is in line with practice established in the London Plan and by other planning authorities. Ongoing work is being undertaken by BBC and ECC in response to the UK air Quality Action Plan for Nitrogen Dioxide, including recent funding for early measures secured through DEFRA.	Clarification which addresses concerns raised by ECC. (Representation RPLP/1762)
OM9.38	Paragraph 9.99	92	Add paragraph after 9.99: Electric Vehicle Charging infrastructure includes the provision of both 'active' and 'passive' charging points. An active charging point is fully wired and ready to use, whereas for passive charging points, the infrastructure is installed but electricity supply	Clarification which addresses concerns by Redrow Homes Ltd. (Representation RPLP/2214)

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			not activated. The necessary charging equipment may not be supplied but could be added at a later date at the property owners' expense.	
OM9.39	Paragraph 9.104	93	Therefore, any new developments that will require regular servicing by HGVs should not be designed in such a way that they could potentially add to the congestion issues already experienced, including air quality issues, or present a concern for highway safety. Ongoing work is being undertaken by BBC and ECC in response to the UK air Quality Action Plan for Nitrogen Dioxide and developers should work with the relevant authorities to ensure that scheme design does not conflict with the aspirations of the Council's in this regard.	Clarification which addresses concerns raised by ECC. (Representation RPLP/1763)
OM10.1	Policy COM3	98	The Council will support proposals which install new, or improve existing, communications infrastructure if they are required to enable the successful delivery of new development, and where they accord with all other relevant policies in the plan. All new developments will be expected to: a. Identify and plan for the digital telecommunications network demand and infrastructure needs arising from the development, and ensure that these are addressed in reasonable.	Minor amendment to provide clarification on the role of the developer sought by multiple developers. (RPLP/1319, RPLP/1348 & RPLP/2046)

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			time to serve the proposed development from first occupation; b. Facilitate or contribute to the development of enabling infrastructure Include provision for connection to superfast broadband and 4G mobile phone coverage across the site, as a minimum;	
OM11.1	Paragraph 11.24	104	Part M4 Category 2 of the Building Regulations on adaptable and accessible homes provides the opportunity for people to live in their homes for longer as they can be adapted to accommodate changing needs in terms of accessibility. The Council will require a 10% of new homes to be constructed to Part M4 Category 2 within major developments proposals as set out in policy H25.	The modification sought by a number of developers in respect of paragraph 11.24 clarifies what is meant and stated in policy H25. (RPLP/1873, RPLP/1936, RPLP/2076, RPLP/2080, RPLP/1321, RPLP/1783 & RPLP/1783 & RPLP/2020)
OM11.2	Paragraph 11.46	108	The Council will therefore work closely with the neighbourhood area, where the community includes Gypsy and Travellers to ensure that growth arising from within these area is accommodated within their Neighbourhood Plans. The Council will also continue to	Clarification which addresses concerns raised by Chelmsford City Council.

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			work with neighbouring authorities, having regard to the EPOA Unmet Gypsy, Traveller and Travelling Showpeople Accommodation Needs Protocol, to identify a strategic approach to meeting the needs of Gypsies, Travellers and Travelling Showpeople in accordance with the requirements of national policy.	(Representation RPLP/1643)
OM11.3	New topic heading and Paragraph 11.47	108	Transit Site Provision 11.47 The BBLNAA has not identified a need for transit sites in Basildon Borough to accommodate temporary pitches, as it suggests that current data does not provide a detailed enough spatial view on where and how much provision is needed across the whole of Essex. The Council will therefore work closely with other Essex authorities and other relevant bodies to identify the need for future transit provision in Greater Essex.	Clarification sought by Rochford District Council. (Representation RPLP/1658)
OM11.4	Policy H3: Gypsy, Traveller and Travelling Showpeople Accommodation Strategy - Point 1, parts a and b	108	a. Securing Safeguarding 25 existing authorised public urban pitches and 116 private pitches currently authorised, with temporary planning permission or tolerated. b. Securing Safeguarding the 2 existing authorised Travelling Showpeople plots.	Word correction.
OM11.5	Paragraph 11.56	111	Any sports provision that would otherwise be lost on site through redevelopment must be relocated	Clarification sought by Sport England.

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			commensurate and prior to any residential or employment development taking place that would otherwise effect it. The management arrangements for relocated sports facilities must be at least equivalent to the existing arrangements in relation to matters such as security of tenure, maintenance costs, management charges and community accessibility.	(Representation RPLP/818)
OM11.6	Paragraph 11.57	111	There is also opportunity to consolidate the sports facilities remaining on site to create a central community sports hub that serves both residents of the new development and the wider community. Any sports provision that would otherwise be lost on site through redevelopment must be relocated commensurate with additional or enhanced facilities, which meet Sport England and sports governing body design guidance, building regulations and health and safety requirements.	Clarification sought by Sport England. (Representation RPLP/818)
OM11.7	Paragraph 11.60	111	Whilst the exact layout of the site will be determined through the Development Brief/Masterplan, the <i>High Level Development Framework</i> recommends employment land be directed within the north east of the site, closer to the adjacent Cranes employment area; public open space to the north west where the remaining sports provision is currently sited, and the primary school	Clarification sought by Sport England. (Representation RPLP/818)

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			and residential areas including a small local centre to be directed to the southern part of the site close to the established residential area of Fryerns. The Masterplan should be informed by the Playing Pitch Strategy 2018.	
OM11.8	Paragraph 11.63	111	In order to ensure there is sufficient highways capacity within the local area to accommodate growth in this location highways and transportation improvements will be required.	Clarification sought by ECC to emphasise the modal shift towards active and sustainable transport modes (Representation RPLP/1768)
OM11.9	Policy H5 – Point 2	112	2. Development of the site must be informed by an up to date Development Brief/Masterplan, which considers the detailed matters of how to deliver the site's strategic policy requirements, including its scale and layout, massing, supporting facilities, open space (including playing pitch requirements), ecology, drainage, and internal highway and transport network. It must demonstrate how it can best be integrated within the neighbouring Cranes employment area to the east, and Fryerns neighbourhood to the south, for the purposes of connectivity, access to off-site services and place-making.	Clarification sought by Sport England. (Representation RPLP/818)
OM11.10	Paragraph 11.75	115	The site will also provide open space, which includes a 7.8ha sperts community hub, in order to meet the needs	Countryside Properties have sought clarity

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			arising from this site and to relocate sports facilities from Gardiners Lane South, as set out in policy H5. The open space and sports community hub will be located on land to the east of the site with residential development located to the west.	within paragraph 11.75 as to the amount of open space required. (Representation RPLP/1322)
OM11.11	Paragraph 11.80	115	In terms of highways, access arrangements for this site will need to be in accordance with the Local Transport Plan Development Management Policies. Access to the eastern part of the site will be secured via a new link road from West Mayne and a secondary access will also be secured into the sports facilities from Mandeville Way. Access to the western part of the site will be secured from Lower Dunton Road. Development in this location will_be expected to make a contribution towards these junction improvements, and also contribute towards improvements to walking, cycling and public transport provision within the vicinity of the site in order to facilitate a modal shift towards active and sustainable transport modes.	Countryside Properties have also sought an amendment to paragraph 11.80 improvements on grounds that the developer will be providing mitigation by the construction of the link road in accordance with the March 2018 Transport and Highway Impact. Assessment) (Representation RPLP/1324)

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OM11.12	Policy H8 – Point 1	115	1. 20ha of land to the west of Basildon, as identified on the Policies Map with the notation H8, will be developed to provide around 300 high quality homes at a density of around 30duph, as well as open space including a site for a 7.8ha sports hub.	Clarity sought by Countryside Properties Ltd. (Representation RPLP/1322)
OM11.13	Policy H8 – Point 2	116	2. The on-site open space provision will be located to the eastern part of the site. It should will provide land for a new sports hub incorporating which will incorporate the relocated sports pitches from Gardiners Lane South, in accordance with policy H5, and additional provision that meets will also meet the formal open space needs arising from this development.	Clarity sought by Countryside Properties Ltd. (Representation RPLP/1322)
OM11.14	Paragraph 11.100	120	The loss of sports pitches, particularly grass pitches, will be resisted by the Council in accordance with the NPPF, PPG and advice by Sports England. Any sports provision that would otherwise be lost on site through redevelopment must be relocated prior to any residential development taking place. The development of the area proposed for residential should be planned to minimise residential amenity impact associated with the operation of Bowers & Pitsea FC facilities. The Masterplan/Development Brief being informed by the Council's Playing Pitch Strategy and Built Facilities Strategy	Clarification sought by Sport England. (Representation RPLP/820)

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OM11.15	Paragraph 11.103	120	There is opportunity to relocate an existing primary school to the hub in order to meet existing needs and those arising from the new development or to provide an additional 1 form of entry primary school and associated early years provision.	Clarification sought by ECC. (Representation RPLP/1769)
OM11.16	Policy H11 – Point 4	121	4. A new community hub providing leisure facilities and land for D1 educational use will be located to the north of the allocation. 2.1ha for a primary school (including associations early years and childcare) and a 10 ha Secondary school site meeting the criteria set out in ECCs Developers Guide to Infrastructure Contributions (2016	Clarification sought by ECC to ensure the delivery of necessary infrastructure. (Representation RPLP/1766)
OM11.17	Policy H11 – Point 4	121	4In terms of leisure provision, the hub will comprise of the relocated Eversley Leisure Centre while the strategic open space will be expected to provide a community playing pitch provision that meets the needs arising from the residential development in H11 in accordance with HC2, as well as offset the loss of playing fields from elsewhere in H11 and accommodate the relocated sports pitches from Gardiners Lane, as set out in policy H5. The strategic open space will remain within the extent of the Green Belt. It is required expected that any relocated provision will be replaced with equivalent or better facility provision both in terms of quality and quantity. The management arrangements for the relocated sports	Clarification sought by Sport England. (Representation RPLP/820)

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			facilities must be at least equivalent to the existing arrangements in relation to matters such as security of tenure and equivalent or better community access arrangements. Relocated facilities must meet Sport England design guide.	
OM11.18	Policy H11 – Point 6	121	6. The design and layout of development must respect the designated historic heritage assets on the London Road, and ensure that elements of the historic environment and their setting are adequately protected from harm.	Clarification in line with NPPF requested by Historic England. (Representation RPLP/2159)
OM11.19	Policy H13 – Point 4	125	4. Proposals must be informed by Odour Plume Modelling to the satisfaction of Anglian Water if new homes are to be located within 400m of the Shotgate Water Recycling Centre, where there is a risk of odour and amenity issues, any mitigation works required to enable development closer to the centre must be completed and operational, prior to the site's residential occupation.	Clarification proposed by Anglian Water. (Representation RPLP/2124)
OM11.20	Paragraph 11.119	124	Insert after Paragraph 11.119 Development in this location must not cause harm to the setting of the two grade II listed buildings at Shot Farm to the east of the site.	Clarification sought by Historic England. (Representation RPLP/2160)
OM11.21	Policy H14 – Point 3	126	3. The Barn Hall Recreation Ground will be relocated to the west of the development area on land identified as	Clarification sought by Sport England.

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			open space and Green Belt on the Policies Map. Its relocation must be commensurate to the redevelopment of its current site and it should form part of the new strategic open space for north Wickford with new connections to the existing Public Rights of Way. It is expected that any relocated provision will be replaced with equivalent or better facility provision both in terms of quality and quantity. It will be in addition to any sports provision required to meet the needs arising from the new development. The management arrangements for the relocated sports facilities must be better or at least equivalent to the existing arrangements in relation to matters such as security of tenure and equivalent or better community access arrangements. Relocated facilities must meet Sport England design guide.	(Representation RPLP/821)
OM11.22	Policy H16 – Point 2	129	2. Access to this site must be secured from Potash Road, utilising existing access points in accordance with the policies of the Highways Authority.	Clarity on how access will be secured for this site sought by the promoter, P and A Investments. (Representation RPLP/2012)
OM11.23	Policy H16 – Point 4	129	The design and layout of development must take into account the existing fuel pipelines which traverse the site and in close proximity to the site. Consideration will be	For the purpose of clarity stating that the design and layout of

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			given to the requirements of CLH Pipeline System, in order to ensure safe working in close proximity to buried CLH-PS pipelines.	development must take into account the existing fuel pipelines.
OM11.24	Paragraph 11.146	129	The relief road, stretching from the A129/London Road junction heading towards Brentwood, south-eastwards to the junction of the B1007/Laindon Road with A176/Noak Hill Road, is key to the release of land for development in this location required to deliver this allocation as a whole, with each housing allocation needing to deliver that part of the road that falls within or adjacent to it.	Clarification sought by Redrow Homes to make clear that each land parcel will be expected to deliver its part of the road. (Representation RPLP/2217)
OM11.25	Paragraph 11.149	130	The site is capable of delivering around 540 new homes alongside open space provision. Development will be expected to retain, where possible, and enhance existing tree belts, field boundaries, hedgerows and the PRoW crossing the site.	Clarification sought by Redrow Homes. (Representation RPLP/2217)
OM11.26	Paragraph 11.150	130	The loss of sports pitches will be resisted by the Council in accordance with the <i>NPPF</i> , <i>PPG</i> and advice by Sports England. Any sports provision that would otherwise be lost on site through redevelopment must be relocated and be in operational use prior to any development taking place. The development of the area proposed for	Clarification sought by Sport England. (Representation RPLP/841)

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			residential should be planned to minimise residential amenity impact associated with the operation of Billericay FC facilities. The Masterplan/Development Brief being informed by the Council's Playing Pitch Strategy and Built Facilities Strategy.	
OM11.27	Paragraph 11.155	130	In addition to contributions to the provision of the relief road, new development will also be expected to make a contribution towards the improvements to the local and strategic road network as appropriate. This is in order to ensure that there is sufficient highways capacity within the local area to accommodate growth in this location. Proportionate contributions towards improvements to walking, cycling and public transport access (including the potential for new bus routes) within the vicinity of each site in order to facilitate a modal shift towards active and sustainable transport modes will also be required.	Clarification sought by ECC. (Representation RPLP/1775)
OM11.28	Policy H17 – Point 1, part b	131	1.b. 2.1ha for D1 education and childcare provision uses within H17b.	Clarification sought by ECC. (Representation RPLP/1766)
OM11.29	Policy H17 – Point 2	131	2. Development as part of this <u>allocation may come</u> forward in phases but must be informed by an up to date Masterplan <u>submitted for approval to the Local Planning Authority</u> , which considers the strategic matters to deliver the site's policy requirements, including its scale and	Amendments sought by Gleeson Developments Ltd and Taylor Wimpey to improve the clarity of the policy and to ensure

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			layout, massing, infrastructure and supporting facilities, open space, ecology, drainage, and internal highway and transport network, including the alignment of the relief road.	the policy is delivered in a coordinated manner. (Representation RPLP/1846 & RPLP/1908)
OM11.30	Policy H17 – Point 3	131	3. The relocation of the cricket club and tennis club will be accommodated on land to the west of the residential allocations, as identified on the Policies Map. It is required expected that any relocated provision will be replaced with equivalent or better facility provision both in terms of quality and quantity. The management arrangements for the relocated cricket and tennis club facilities must be at least equivalent to the existing arrangements in relation to matters such as security of tenure and community access arrangements. This land will remain within the extent of the Green Belt and the facilities should have access arrangements which meet the satisfaction of the Highway Authority.	Clarification sought by Sport England. (Representation RPLP/841)
OM11.31	Policy H17 – Point 5	132	5. Land south of London Road, as identified on the Policies Map with the notation H17b, will form a residential extension of around 290 new homes and include 2.1ha of land for D1 education and childcare provision uses.	Clarification sought by ECC. (Representation RPLP/1766)

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OM11.32	Policy H17 – Point 8	132	8. Tree belts, hedgerows and other natural landscape features should also be retained and enhanced as far as is practical, using ecological and arboriculture surveys to identify and protect the most important features.	Clarification sought by Redrow Homes. (Representation RPLP/2217)
OM11.33	Paragraph 11.164	133	This site will require community infrastructure provision to support the level of growth proposed. There will be a requirement for contributions towards early years. childcare and primary school provision in the local area.	Clarification sought by ECC. (Representation RPLP/1812)
OM11.34	Paragraph 11.167	134	This allocation will expand the neighbourhoods of Sunnymede and South Green in Billericay through two residential extensions, as well as create a 16ha-extension of publicly accessible recreational open space to amongst other things help off-set recreational pressures-to on the existing Mill Meadows Nature Reserve.	Clarification sought by Commercial Estates Group. (Representation RPLP/2253)
OM11.35	Paragraph 11.168	134	Where practical, having regard to ecology and arboricultural surveys, to ensure protection of the most important features, existing hedgerows will be retained and enhanced. Landscape buffers will be required along the southern boundary of H19a and the northern boundary of H19b to screen development from the new strategic open space which will be located on land between the two development areas. The strategic open space will form the extension to Mill Meadows Nature Reserve and provide locally accessible public open space	Clarification sought by Commercial Estates Group to make clear the Council's intention for this to be a publicly accessible space. (Representation RPLP/2253)

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			for the wider area of Billericay as well as meet the needs arising from this allocation, relieving pressure on the neighboring Mill Meadows Nature Reserve. As well as meet the needs arising from this allocation.	
OM11.36	Policy H19 – Point 3	135	3. Land between H19a and H19b, as identified on the Policies Map as public open space, will provide the 16ha of publically accessible informal and formal recreational open space extension to Mill Meadows Nature Reserve as a strategic open space provision. It will remain within the extent of the Green Belt and be multi-functional, incorporating open land, informal and formal recreational open space, and ecological and surface water management benefits.	Clarification sought by Commercial Estates Group to make clear the Council's intention for this to be a publically accessible space. (Representation RPLP/2253)
OM11.37	Policy H19 – Point 4	135	4. The extension to Mill Meadow Nature Reserve area of land identified for strategic open space provision must be gifted to the Council, or a third party agreed by the Council, prior to the first occupation of any development, and mechanisms to ensure the ongoing maintenance of this open space for a minimum period of 20 years will need to be secured.	Clarification sought by Commercial Estates Group to make clear the Council's intention for this to be a publically accessible space. (Representation RPLP/2253)
OM11.38	Paragraph 11.183	137	The first site is land east of Laindon Road, Billericay, hereafter referred to as H21a. It is 0.8ha in size and capable of delivering around 6 self-build homes. Access	Clarification sought by Historic England.

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			will be taken from Laindon Road with a new internal road serving the new homes. Development on this site will need to be designed mindful of the nearby Billericay Conservation Area.	(Representation RPLP/2166)
OM11.39	Paragraph 11.184	137	The second site is 1.5ha of land at Maitland Lodge, Great Burstead, hereafter referred to as H21b. The site is capable of delivering around 20 self-build homes which are served by a new internal road that is accessed from Southend Road. Development on the site will need to be designed mindful of the nearby Great Burstead Conservation Area.	Clarification sought by Historic England. (Representation RPLP/2166)
OM11.40	Policy H21 – Point 3	137	3. The development must be sensitive to the nearby Norsey Wood for its ecological and historic asset designations (Scheduled Monument). Access will be taken from The Mount, subject to approval by the Highways Authority.	Clarification sought by Historic England. (Representation RPLP/2166)
OM11.41	Paragraph 11.216	143	The Independent Living Programme recommends that specialist accommodation schemes for older people should consist of a minimum of 60 units to a maximum of 300 units for reasons of affordability and the ability to create and support an active community. It is recognised that private led schemes may be viable at a smaller scale that that which can be delivered via the Independent Living Programme. According to viability testing carried	Clarification sought by The Consortium of Renaissance Retirement, Pegasus Life, McCarthy and Stone and Churchill Retirement House Builders.

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			following types and locations of schemes and, where a lower provision is justified, affordable housing will be required at the level at which the development becomes viable:	Ltd. (Representation RPLP/1881)
			 a) Flatted development schemes of around 150 units in Basildon Town and Wickford; b) Housing development schemes of around 150 units in Basildon Town and Wickford; and c) Other schemes (including strategic housing sites identified in policies H5-H20 of this plan) only where there are exceptional development costs. 	
OM12.1	Paragraph 12.7	150	The way places are designed affects the way residents and users behave. Active Design (2015) published by Sport England in conjunction with Public Health England highlights the way design can be used to encourage greater levels of activity amongst residents and users of development. It sets out nine principles that can be applied when designing and masterplanning development proposals in order to support healthy lifestyles by facilitating participation in sport and physical activity, including encouraging walking and cycling access to PRoW for short journeys and introducing space for sport and recreation within development proposals.	Amendment sought by the Essex Bridleway Association to ensure access for all vulnerable road users. (Representation RPLP/365)
OM12.2	Policy DES1 – Point 2, part f	152	2. f. Create the conditions for walking and cycling to access PRoW between locations within and beyond the	Amendment sought by the Essex Bridleway

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			proposals are brought forward within a designated neighbourhood area, the local design policies and guidance within the adopted Neighbourhood Plan will be applicable.	
OM12.5	Policy DES1 – Point 2, part b	152	2. b. Correspond with the natural features and historic quality of the area that contributes to its special interest including all heritage assets together with their settings, in accordance with appropriate guidance and those policies in chapters 16 and 17 of this plan;	Historic England sought reference to the 'Streets for All' guidance. (Representation RPLP/2167)
OM12.6	Policy DES4	156-157	High Quality Buildings 1. Buildings should be designed to a high standard, responding appropriately to their location and reflecting their function and role in relation to the public realm. Proposals for new buildings, extensions, and alterations to existing buildings will be expected to: a. Conserve and enhance any historic fabric, features and assets, having regard to appropriate guidance;	Amendment sought by Historic England to reflect the historic environment. (Representation RPLP/2170) Reordered to improve clarity.

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			ab. Use good quality and durable building materials, that are appropriate to the context of the development;	
			bc. Be clearly organised in terms of their form and internal layout and circulation to reflect the hierarchy of function they will accommodate, the uses they will serve and the context they will address;	
			ed. Establish a coherent and consistent building line that relates to the existing street alignment;	
			de. Incorporate active frontages to the public realm that emphasise corners, establishes new, or reinforces the most prominent existing frontages, and provide natural surveillance over all publicly accessible spaces;	
			ef. Create distinct public frontages and private areas with clear and delineated boundaries;	
			fg. Allow for flexibility in future adaptation or extension to accommodate alternative uses, or to respond to the changing future needs or circumstances of occupiers by means of their	

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
			internal arrangement, internal height, detailed design and construction; gh. Incorporate exteriors and elevations that provide visual interest, and are visually organised and well-proportioned to contribute positively to the legibility of the area; and hi. Enable the provision of adequate, appropriate and usable private or communal amenity space, defensible space, as well as parking and servicing as necessary.	
OM12.7	Policy DES4 – Point 1, part f	157	fg. Where appropriate, aAllow for flexibility in future adaptation or extension to accommodate alternative uses, or to respond to the changing future needs or circumstances of occupiers by means of their internal arrangement, internal height, detailed design and construction, in accordance with policy H25 of this plan;	Reordered as a result of previous amendment. Amendment sought by group of developers to ensure the consistency of technical standards for accessible and adaptable housing, with the PPG. (Representations RPLP/1326,

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				RPLP/1357, RPLP/1862, RPLP/1945, RPLP/1971 & RPLP/2101)
OM12.8	Policy DES5 – Point 2	159	2. Proposals for new development or the redevelopment of prominent sites within town centres, and for developments comprising 50 homes or more, or 1,000m2 or more in other locations will be expected to be supported by a Public Realm Strategy setting out how they streets and public spaces will be designed to:	Clarification to address concerns expressed by a group of developers on the overlap between policies DES4 and DES5.
				(Representations RPLP/1861, RPLP/1944, RPLP/1970 & RPLP/2098)
OM12.9	Policy DES5 – Point 2, part b	159	2. b. Harmonise with the street scene environment and enhance the quality, character and appearance of the public realm through their siting and design;	Clarification to address concerns expressed by a group of developers on the overlap between policies DES4 and DES5.
				(Representations RPLP/1861,

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				RPLP/1944, RPLP/1970 & RPLP/2098)
OM12.10	Policy DES5 – Point 2, part h	159	2. h. Sensitively integrate and prioritise appropriate levels of movement infrastructure for all users, having regard to age, gender and disability, including provision for convenient pedestrian and cycle movement PRoWs;	Amended for consistency with other amendments sought by the Essex Bridleway Association.
OM12.11	Policy DES5 - Point 3	159	3. In all cases where a Public Realm Strategy is required, and in any other case where landscaping is required to make a development proposal acceptable, such proposals will be expected to be supported by a detailed Landscape Strategy should be prepared and approved by the Council, which can be incorporated into the Public Realm Strategy if appropriate, which:	Amendment sought by developers. (Representations RPLP/1328 & RPLP/1359)
OM12.12	Policy DES5 - Point 4	159	4. All significant development proposals, as defined by Part 2 of this policy, will be required to contribute to the provision of new public realm and/or the enhancement and maintenance of the existing public realm, either by means of on-site provision, and/or a financial contribution. Such development will also be expected to contribute towards the long-term maintenance of public realm they provide, or is provided nearby in order to make a development acceptable in planning terms. Where	Clarification to address concerns expressed by a group of developers regarding public realm improvements. (Representations RPLP/1864, RPLP/1946,

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			appropriate, a Planning Obligation may be used to secure off-site public realm improvements.	RPLP/1972 & RPLP/2104)
OM12.13	Policy DES5 – Point 2, part c	159	2. c. Conserve and enhance any historic fabric, features and assets, having regard to appropriate guidance;	Historic England sought reference to the 'Streets for All' guidance. (Representation RPLP/2171)
OM12.14	Policy DES5 – Point 3, part d	159	3.d. Integrates measures to manage climate change, improve air quality and promote biodiversity, such as the incorporation of multi-functional Green Infrastructure within urban development;	Amendment sought by Natural England. (Representation RPLP/2554)
OM13.1	Paragraph 13.5	162	Essex County Council has a statutory duty to 'improve the health of their local populations' and are is responsible for public health across the county. A local Health and Wellbeing Board has been established in the Borough to facilitate delivery, alongside the Essex Health and Wellbeing board. The Essex Joint Health and Wellbeing Strategy for Essex (2012) established a strategy for achieving this statutory duty. This has since been updated and the Board are now working to deliver the Joint Health and Wellbeing Strategy 2018 – 2022. Basildon Council is one of the partners that has joined up with Active Essex, a publicly funded organisation hosted by Essex County Council, to be part of the 'Active Essex	Grammatical amendment Minor amendment to update position of related strategy, as requested by ECC. (Representation RPLP/1777 and RPLP/1727)

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			Strategy 2017 – 2021', which has received national lottery funding to create innovative partnerships to make it easier for people to access sport and physical activity within Essex, therefore improving health and well-being.	
OM13.2	Policy HC1 – Point 1, part b	164	1. b. Providing opportunities for people to walk and cycle access public rights of way (PROW), both for recreation purposes, and also as part of their day to day activities.	Amendment sought by the Essex Bridleway Association to ensure access for riders. PROW include bridleways. (Representation RPLP/366)
OM13.3	Policy HC1 - Point 4	165	4. Ensure new development is designed and located to promote good health, and avoid sources of harm by: a. Requiring all developments of 50 homes or more, 1,000m2 of floorspace or more, or falling within the A5 use class, set out in policy R16, to be accompanied by a Health Impact Assessment prepared in accordance with local guidance; b. a. Requiring good quality design in new developments, including design which incorporates active design principles; and	Clarity requested by developers as to the test that will be applied to HIAs when submitted. (Representations RPLP/1867/1950/1974/2106) Reordered to improve clarity.

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
			e. b. Avoiding development in locations which may cause harm to human health by way of disturbance to the quality of life, or pollution; and c. Requiring all developments of 50 homes or more, 1,000m2 of floorspace or more, or falling within the A5 use class as set out in policy R16, to be accompanied by a Health Impact Assessment prepared in accordance with local guidance which demonstrates how the development promotes positive health outcomes and avoids sources of harm to health. Where harm to health may arise, and is not adequately addressed by the development proposals, the proposal may be refused.	
OM13.4	Paragraphs 13.20 and 13.21	165 – 166	The Council has regularly updated its evidence base with regard to open space provision, playing pitch provision and indoor sports facilities. Previous updates took place between 2010 and 2012, and have enabled the Council, alone and in conjunction with partners, to plan for and deliver a number of improvements to open spaces, playing pitch provision and sports facilities in the Borough. However, over the course of time circumstances change. For example, the demand for indoor gymnasium facilities has outstripped expectations due to the competitive success of local athletes and the legacy of the London 2012 Olympic and Paralympic games. Furthermore, the number of homes planned for in this Local Plan is greater than that anticipated in 2010-	Minor amendment to update position of the evidence regarding the Playing Pitch and Built Facilities Assessments and Strategies, as requested by Sport England. (Representation RPLP/824)

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			2012. It has therefore been necessary to commission a reviews of this evidence base, and it is likely to be the case that this need will arise again through the lifetime of the Local Plan.	
			The most recent work to assess and plan for epen spaces, playing pitches and indoor sports facilities has been undertaken at a South Essex level resulting in Basildon specific and South Essex wide Playing Pitch and Built Facilities Strategies completed in 2018 and adopted by the Council in November 2018. This has enabled the consideration of cross-boundary movements for sport and recreation to take place, recognising that some facilities, such as Basildon Sporting Village, have a wider than local draw. It has also enabled the consideration of opportunities for joint working and shared facilities to occur. It is these strategies, and the standards requirements that they contain, which will be applicable when developers are seeking to bring forward residential development proposals within the Borough which generate an additional need for open space, playing pitches and indoor sports facilities. A South Essex wide Green Infrastructure Strategy is due to commence in 2019, and this will update the position in relation to the provision of other types of open space going forward.	

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OM13.5	Paragraph 13.24	166	In addition to formally identified open spaces, the wider network of Green Infrastructure in the Borough and beyond provides the opportunity for outdoor recreation such as walking and cycling. PRoW, including proposals for a Thames Estuary Path, and the cycle network therefore have an important role to play in ensuring the health and well-being of Borough residents. Furthermore, the provision of high quality local opportunities to walk and cycle will help to stop local residents from travelling for such activity, protecting sensitive habitats on the Essex coast from disturbance, and also reducing the need to travel. Ensuring new developments are connected to the PRoW network and the delivery of the Basildon Cycling Action Plan are therefore also essential to the Council's approach to leisure and recreation.	ECC sought reference to the Thames Estuary Path in paragraph 13.24. (Representation RPLP/1779)
OM13.6	Policy HC2 – Point 1, part b	167	1. b. Seek improvements to the quality, quantity and sustainability of playing pitch provision in the Borough through the implementation of the <i>Playing Pitch Strategy</i> . Where necessary playing pitch provision will be secured on strategic housing sites as identified in policies H5 to H20. All other residential developments will be expected to contribute towards off-site provision in accordance	Consistent with the most recent evidence set out in the Playing Pitch Strategy which advocates use of the Sport England Calculators. (Representation RPLP/825)

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			with local standards for playing pitch provision the approach set out in the Playing Pitch Strategy.	
OM13.7	Policy HC2 – Point 1, part c	167	1. c. Seek improvements to the quality, quantity and sustainability of indoor sports facilities in the Borough through the implementation of the <i>Built Facilities Strategy</i> . Unless on-site provision is specified within a strategic housing site allocation policy (H5 to H20), all residential developments will be expected to contribute towards off-site provision in accordance with local standards for indoor sports provision the approach set out in the <i>Built Facilities Strategy</i> .	Consistent with the most recent evidence set out in the Built Facilities Strategy which advocates use of the Sport England Calculators. (Representation RPLP/825)
OM13.8	Paragraph 13.28	167	Evidence demonstrates that the Borough will need to improve existing educational facilities to create a more balanced distribution of occupied school places, in order to raise aspirations and diversify the skills of the workforce, as well as strengthening the economy to ensure local people can make the most of any new job opportunities that arise. This will contribute towards the health and well-being of local residents by helping to reduce employment deprivation. Education facilities includes, but are not limited to nurseries, pre-schools, Essex Child and Well-being Service, children's centres, schools — including special educational needs provision, colleges, libraries, youth facilities and other community	Clarification sought from ECC. (Representation RPLP/1780)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
			learning spaces. The Local Plan recognises that the level of population growth will result in the need to improve existing educational facilities throughout the Borough, including new provision where sites are at capacity.	
OM13.9	Paragraphs13.28 and 13.29	167 - 168	Evidence demonstrates that the Borough will need to improve existing educational facilities to create a more balanced distribution of occupied school places, in order to raise aspirations and diversify the skills of the workforce, as well as strengthen the economy to ensure local people can make the most of any new job opportunities that arise. This will contribute towards the health and wellbeing of local residents by helping to reduce employment deprivation. Education facilities includes, but are not limited to nurseries, pre-schools, Essex Child and Wellbeing Service, children's centres, schools (including Special Education Needs), colleges, libraries, youth facilities and other community learning spaces. The Local Plan recognises that the level of population growth will result in the need to improve existing educational facilities throughout the Borough, including new provision where sites are at capacity. The Borough is currently generally well served by school provision. However, Commissioning School Places in Essex (2017-2022) shows that many of the primary schools	Amendment requested by ECC to reflect the changing position over time and the need to cover Special Educational Needs. (Representations RPLP/1782 & RPLP/1784)
			The Borough is currently generally well served by school	

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			provision in the Basildon urban area given an outflow of pupils from Basildon. As a result, the secondary schools in Billericay and Wickford are at capacity, and some pupils also travel outside of the Borough to schools in Benfleet and Thundersley in neighbouring Castle Point to the east. However, efforts have been made by the schools in Basildon, through partnership working, to raise educational attainment in the town and most all of the secondary schools are now on the path to achieving an rated OfSted Good or outstanding rating. This will help to stem the outflow of pupils from Basildon, and any impacts it consequently has on traffic and congestion. This will potentially see some secondary school capacity within Billericay and Wickford freed up to accommodate local growth, but will see the capacity of the secondary schools in Basildon to accommodate growth reduced as existing pupils stay within the town for their secondary education.	
OM13.10	Policy HC3 - Point 3	170	3. In order to ensure sufficient school place provision to align with growth, a new primary school and early years provision will be secured in the Bowers Gifford Neighbourhood Area through the preparation of a Neighbourhood plan. Other new schools will be secured on strategic housing sites as specified within the site allocation policies set out in Chapter 11 as identified in policies H5 to H20. All other residential developments, where there is not a site specific requirement within a site	Clarification that there is a need for a primary school in Bowers Gifford which will be secured through the Neighbourhood Plan and not a strategic site allocation. Requested By BGNB Parish

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			allocation policy, will be expected to contribute towards off-site provision in accordance with Essex-wide standards for education and early years contributions.	Council. (Representation RPLP/3695)
				Clarification to reflect most of the site allocations do not require on site provision as sought by countryside Properties (UK) Ltd and Gleeson Developments/Avant Homes. (Representations RPLP/1362)
OM13.11	Paragraphs 13.56 and 13.57	171 - 172	The Council's most recent <i>Open Space Assessment</i> (2010) and <i>Playing Pitch Strategy</i> (2018) Review and Technical Addendum (2011) considered the quantity, quality and accessibility of open spaces, and playing pitches, in the Borough and advised on the approach that should be taken to each site. In particular it highlighted where open spaces should be retained for leisure and recreation purposes. They also set standards for the quantity, quantity and accessibility of open space and	Updated supporting text to reflect recently completed Playing Pitch Strategy, as requested by Sport England. (Representation RPLP/828)

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			identify the approach that should be taken to secure new playing pitch provision. Whilst the Playing Pitch Strategy (2018) reflects the level of growth set out in this plan, the Open Space Assessment (2010) did not assess the level of growth now planned for. As set out in respect of policy HC2, the level of growth now proposed in the Local Plan is greater than that considered in 2010, and consequently both the Open Space Assessment and Playing Pitch Assessment are subject to review at a South Essex level. However, it is clear from evidence set out in the Planning for Health and Wellbeing Topic Paper that the projected growth in population is such that open spaces will become more important resources for the future rather than less, and therefore the ongoing protection of those open spaces identified in 2010 remains justified. It will however be necessary to consider the most up to date local Open Space Strategy/Playing Pitch Strategy when considering the appropriateness of proposals for the redevelopment of public open spaces, as these will contain the most up to date evidence. local standards.	
OM13.12	Policy HC5 – Point 3, part b	172	3. b. The open space is replaced with an equivalent or better facility, in terms of quantity and quality, either onsite as part of the new development, or off-site in a suitable location;	Amendment to align with NPPF requested by Sport England.

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			providers change. The Education Authority for example prepare an annual Commissioning School Places assessment which directs the need for school provision. There is a Playing Pitch Strategy and a Built Facilities Strategy to direct the provision of sporting facilities, and the CCG and NHS are developing an Estates Strategy to direct the provision of new health care facilities. These not only deal with growth but also address There are long term infrastructure issues which need to be addressed such as the need for increased provision of certain types of facility to accommodate population growth in the Borough as set out in this plan. This growth will require the provision of additional community facilities and services in order to ensure communities can meet their day to day needs. As such, new development proposals should exploit the potential for enhancement and extension of community facilities to serve future residents and other users.	Strategy, and Built Facilities Strategy as requested by Sport England. (Representation RPLP/832)
OM13.16	Paragraph 13.85	177	Basildon is generally well provided with open space, and benefits from a range of outdoor recreational facilities which provide locations for activities such as team sports, walking, cycling, nature conservation, horse-riding, fishing and golf. However, the Borough's <i>Open Space Assessment</i> highlights substantial open space deficiencies when recommended standards of provision are applied to the existing and projected future population of the Borough,	Updated supporting text to reflect recently completed Playing Pitch Strategy, and Built Facilities Strategy.

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			particularly in Billericay and Wickford. Deficits in the provision of certain types of sports pitches and built sports facilities are also identified by the Playing Pitch Strategy (2018) and the Built Facilities Strategy (2018) respectively, which means existing provision needs to be protected in many instances.	
			[INSERT PARAGRAPH BREAK] There is also an uneven distribution of community centres around the Borough and some areas are deficient in the provision of such facility. However, an analysis of usage indicates that there may well be over provision of community centres due to a lack of demand for services, particularly in the smaller community centres.	
OM14.1	New Paragraphs 14.82 to 14.83	194	14.82 The Basildon Playing Pitch Strategy Assessment Report (2018), Basildon Playing Pitch Strategy and Action Plan (2018), South Essex Playing Pitch Strategy Overarching Strategy and Action Plan (2018) and the Basildon Indoor Sports Facilities Strategy and Action Plan (2018), Basildon Indoor and Build facilities Needs Assessment (2018) and South Essex Indoor Sports Facilities Overarching Strategy and Action Plan (2018) identify current levels of provision within Basildon across the public, education, voluntary and commercial sectors and compare this with current and likely future levels of	Sport England recommend that the recent sporting evidence base should be referenced under policy GB11. (Representation/835)

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			demand. The strategies then go on to provide a strategic framework that ensures the provision of outdoor sports facilities and indoor built facilities meets the local needs of existing and future residents, ensuring residents have the opportunity to be physically active and healthier and where appropriate develop their sporting ambitions within their local community.	
			14.83 The strategies provide an evidence base for planning decisions and funding bids and background evidence to support Local Plan policies in relation to formal recreation. They ensure that this evidence is sound, robust and capable of being scrutinised through examination and meets the requirements of the National Planning Policy Framework (NPPF, 2018).	
OM14.2	Paragraph 14.29	183 - 184	Accordingly, and in the light of the Green Belt Study Review, the Local Plan proposes that there should be some modification of the boundary of the Green Belt. The Local Plan retains 6,551ha of land as Green Belt which it considers should continue to be protected for Green Belt purposes. Exceptionally it proposes that 399ha be removed from the Green Belt. The extent of the Green Belt as set out in this Local Plan is 59% of the land area of the Borough, a reduction of 4% in the total land area and 6% of the Green Belt. It should be noted that in the	Amended for accuracy as sought by a resident.

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			event that a Neighbourhood Area revises its Green Belt boundaries through a Neighbourhood Plan, these figures will be adjusted. This will be reported through the Authority Monitoring Report.	
OM15.1	Paragraph 15.1	196	The NPPF is clear that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting planning positively for the delivery of renewable and low carbon energy and associated	Amendment to reflect revised NPPF better, and to further justify approach to renewable energy as sought by multiple developers.
			infrastructure.	(Representations RPLP/1333, RPLP/1334, RPLP/1363, RPLP/
				1364, RPLP/2184 & RPLP/2227)
OM15.2	Paragraphs 15.5 and 15.6	196	It is widely recognised that a primary cause of climate change is the release of CO ₂ emissions into the atmosphere. Whilst there are natural sources of CO ₂ emissions, and intensive agriculture can also result in significant emissions, the primary cause of excess emissions is the burning of fossil fuels such as coal and gas to produce energy. The <i>SAscope</i> reports that in 2005 396kT CO ₂ was generated domestically in the Borough.	Amendment to reflect recently published statistics in the supporting text, as requested by ECC. (Representation RPLP/1794)

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			equivalent to 8% of the Essex domestic total. However, since that time measures have been taken to reduce such emissions. National statistics reporting on CO ₂ emissions for 2016 indicate this has reduced to 262kT. In addition, 497kT of CO ₂ originated from industrial and commercial sources in 2005 -11% of the Essex Industrial and Commercial total. This had reduced to 262kT in 2016. In 2016, road transport accounted for 297kT. This has not decreased as significantly as emissions from other sources. Overall, CO ₂ emissions in Basildon Borough have decreased from 6.7t per capita in 2005 to 4.3t per capita in 2016. In 2016 the national average was 4.7t per capita. CO ₂ emissions in Basildon are therefore below average, the smallest proportion of emissions at 289kT, which equalled 7% of the Essex total. The SAscope also reports changes which have occurred since 2005 in terms of energy consumption within the Borough. The recently published national statistics reporting on CO ₂ emissions update this. Between 2005 and 20164, the average total domestic electricity and gas consumption emissions of a Borough resident fell by 490kWh and 4,560kWh, by 93kT and 50.4kT respectively. This represents percentage reductions of 51% and 23% respectively and is therefore significant. This is a consequence of domestic electricity and domestic gas consumption both falling in Basildon, as set out in the sub-national electricity and gas consumption statistics	

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			2005 to 2017. Domestic electricity consumption is 100kWh per person lower than the national average, whereas domestic gas consumption is 750kWh less than the national average. Between 2005 and 2016 2011, the average total industrial and commercial energy consumer in the Borough reduced their electricity consumption reduced by 55% from 283.7kT to 127.3kT, whilst gas consumption reduced by 32% from 92.6kT to 62.6kT. These reductions are significant, but the consumption levels indicate that there are still opportunities to go further in minimising fuel consumption and CO ₂ emissions. by 17MWh, bringing the total annual amount to 79MWh, which is still 4MWh higher than the national average. Industrial and commercial gas consumption went up slightly over the same time period from 544MWh to 564MWh; however the 2011 total is still 16MWh lower than the average national commercial and industrial consumer.	
OM15.3	Paragraph 15.8	197	The same research by BRE also showed that the greatest lifetime reduction in CO ₂ emissions is achieved through the implementation of renewable energy sources i.e. by increasing the amount of energy being produced from renewable sources within the Borough. This approach saves 4.2 times more CO ₂ emissions than energy efficiency alone. The SAScope reports that between June 2010 and March 2013, the number of domestic solar	Clarity around justification for approach to renewable energy as sought by multiple developers. (Representations RPLP/1333,

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			photovoltaic installations increased by 23,000% from 3 to 692. The Renewable and Low Carbon Energy Constraints and Opportunities Assessment concludes that on-site micro generate of energy from renewable sources such as solar and ground source heating could generate up to 39% of the borough's energy supply by the end of the plan period, through a combination of retro-fitting to existing buildings, and through integration into the fabric of new development. It identifies.—The development of new properties presents an as a key opportunity to integrate on-site micro generation of energy within a buildings fabric. The widely applied Merton Rule seeks all new development with a floorspace of 500m² or one or more residential units to incorporate on-site renewable energy equipment to achieve a percentage reduction in CO2 emissions from the site. BRE recommends that a fabric first approach should be taken with energy efficiency savings of 10% achieved in the first instance through improvements to the building fabric and services, accompanied by a further 10% reduction in energy use through the implementation of renewable energy technologies.	RPLP/1334, RPLP/1363, RPLP/ 1364, RPLP/2184 & RPLP/2227)
OM15.4	Paragraph 15.9	197	Further opportunities to increase renewable energy generation within the Borough have also been considered in the Renewable and Low Carbon Energy Constraints and Opportunities Assessment (2015). The assessment	Clarity around justification for approach to renewable energy as sought by

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			found that there is capacity within the Borough to generate renewable and low-carbon energy through a variety of methods which include, and are not limited to, large scale onshore wind turbines, Combined Heat and Power (CHP) plants, solar voltaic, and as well as microgeneration. It should however be noted that there are Green Belt constraints on the potential for some of these sources which means that micro-generation is critical to the overall approach to renewable energy generation in Basildon Borough. There is however potential for CHP in non-Green Belt locations. In relation to CHP, and other forms of energy generated from waste, Consideration has been given as to how this CHP could be secured in a sustainable and deliverable way within Basildon Borough	multiple developers. (Representations RPLP/1333, RPLP/1363, RPLP/ 1364, RPLP/2184 & RPLP/2227)
OM15.5	Paragraph 15.10	197	Whilst transport formed the smallest component of CO ₂ emissions from the Borough in 2005 <u>its proportional</u> contribution increased to exceed that of both domestic and industrial and commercial sources by 2016. This is a consequence of a, there has been growth in transport movements since that time. Going forward, transport movements are expected to increase at a national level, and this is reflected in industry standard (TEMPRO) growth forecasts. The Borough's highways impact modelling shows that a number of junctions within the Borough already operate at, or over their design capacity	Amendment to reflect recently comments by ECC. (Representation RPLP/1794)

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			which is increasingly resulting in congestion. The modelling shows that the growth proposed in this plan will result in greater levels of congestion. Whilst Chapter 9 seeks to address this through mitigation, congestion and the resultant emissions from vehicles has the potential to increase over this period, impacting on the Borough's contribution to climate change. Therefore, the approach to climate change is intrinsically linked to the approach to sustainable transport set out in Chapter 9.	
OM15.6	Paragraph 15.14	198	The South Essex Surface Water Management Plan (SWMP) (2012) was first prepared in 2012 and definesd the extent and components of Critical Drainage Areas (CDAs) within the Borough. The modelling for the SWMP was updated in 2018, and made some revisions to the extent of the CDAs informed by more detailed information about the drainage systems, and revised rainfall scenarios reflecting new advise from the Environment Agency arising from experience of flooding in other parts of the country. A CDA is an area over which combined flood risk sources (pluvial, groundwater, sewer, main river and/or tidal) may result in the accumulation of flood waters affecting some people, property or infrastructure located within the CDA during a severe rainfall event. Modelling of CDAs within the Borough within the SWMP shows that the number of properties at risk from flooding is likely to increase as a consequence of climate change.	Amendment requested by ECC to reflect newly arising modelling for the SWMP. (Representation RPLP/1795)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
OM15.7	Policy CC1 – Point 1, part d	199	1. d. Seeking high quality sustainable design of new homes, commercial and industrial buildings that through a fabric first approach promote energy, thermal and water efficiency and opportunities for natural cooling as set out in policies CC5 and CC6.	Requirement for fabric first approach appropriately relocated in policy to align with energy and thermal efficiency as sought by multiple developers. (Representations RPLP/1333,
				RPLP/1334, RPLP/1363, RPLP/ 1364, RPLP/2184 & RPLP/2227)
OM15.8	Policy CC1 – Point 1, parts e and f	199	e. Seeking the reduction of CO ₂ emissions from arising from activities within the Borough by securing local sources of renewable energy generation. This will be achieved by: i. As the principal means, securing on-site microgeneration within new development, and encouraging the retro-fitting of on-site micro-generation within existing buildings where appropriate;	Clarify the Council's approach to renewable energy within the strategic policy as sought by multiple developers. (Representations RPLP/1333, RPLP/1363, RPLP/

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			ii. Supporting and promoting the implementation of Eco-Industrial Park (EcoIP) principles within the A127 Enterprise Corridor; and iii. Supporting other proposals for renewable and low carbon energy generation schemes where they comply with the other policies of the plan. buildings through the use of a "fabric first" approach and through provision of commercial scale renewable energy and decentralised energy as part of development proposals in appropriate locations. The Council will require all developments, either new build or conversions with a combined floorspace of 500m² or more, or with one or more residential units, to incorporate the fabric first approach and on-site renewable energy equipment to reduce predicted CO₂ emissions by at least 20%. If the percentage target is technically unfeasible, or can be proven to make the development financially unviable, off-site generation should be employed as an alternative approach; and f. Supporting and promoting the implementation of Eco-Industrial Park (EcoIP) principles within the A127 Enterprise Corridor.	1364, RPLP/2184 & RPLP/2227)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
OM15.9	Paragraph 15.18	199	The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. It expects that Local Plans are supported by SFRA and set out policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk authorities ¹⁴ such as Lead Local Flood Authorities, and internal drainage boards and Anglian Water. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change.	Clarification sought by ECC. (Representation RPLP/1797)
OM15.10	Paragraph 15.22	200	The TE2100 Plan sets out the Environment Agency's and its partners aspirations and approach to flood risk management within this part of the Borough. It states that policy P4 should be applied to the Bowers Marshes area (policy unit). This means that further action will be taken to keep up with climate and land use change so that flood risk does not increase. In order to achieve this, the Plan for the sea defences and mechanical flood barriers protecting this area will be maintained and improved to respond to future sea-level rise. it proposes that the sea defences and mechanical structures protecting this area	Clarifications to the supporting text requested by the Environment Agency. (Representation RPLP/2625)

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			will be maintained and improved to respond to sea-level	
			rises. However, it also expects that some parts of Bowers	
			Marsh, Vange Marsh and/or Fobbing Marsh, where	
			limited development is present, will be turned into inter-	
			tidal marsh (i.e. some inundation by the River Thames will	
			be permitted) The Plan advocates policy P3 for Vange	
			marshes, to continue with existing or alternative actions to	
			manage flood risk accepting that the likelihood of flooding	
			will increase because of climate change. As outlined in	
			section 15.15, the TE2100 Plan aspires to deliver	
			intertidal habitat creation opportunities across its three	
			phases to 2100 in order to off-set the loss of such habitat	
			resulting from climate change,. This may mean that some mechanical structures such as the East Haven and	
			Fobbing Horse barriers may not be maintained in the	
			future, in order to allow for inundation. This will require a revised approach to flood risk management in this part of	
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			the Borough. and there is the opportunity for consideration of candidate sites on the marshes currently upstream of	
			the existing East Haven and Fobbing Horse tidal flood	
			barriers. This may mean a review of the most appropriate	
			means of delivering the aspired tidal flood risk	
			management policy for the given policy unit in this part of	
			the Borough in conjunction with the Environment Agency	
			and partners. The TE2100 Plan requires the preparation	
			development of a Riverside Strategyies in order to	
			improve floodplain management in the vicinity of the river,	
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			is not. As such further flood attenuation areas such as the washlands should be provided alongside new development to manage this risk.	
OM15.12	Policy CC4 - Point 5	204	5. All development proposals, including the redevelopment of existing buildings, must demonstrate that adequate foul water treatment and disposal already exists or can be provided in time to serve the development, and must incorporate Sustainable Drainage Systems (SuDS) which attenuate surface water on-site, and slow run off rates to natural levels. Proposals should seek to reduce the risk of flooding and ensure that it is not increased. SuDS must be designed in accordance with the National Standards for SuDS, and the principles and local standards for SuDS design set out at Appendix 7, and incorporated into the development to offer multifunctional benefits. Furthermore, suitable access for the maintenance of foul and surface water drainage infrastructure should be maintained through the development layout. Where surface water cannot be attenuated fully on-site, a proportional contribution towards an off-site surface water management project may be acceptable if it would deliver the reductions in surface water necessary to off-set the residual development impacts. Development would however need to align with the delivery of the off-site project.	Clarification sought by Anglian Water to ensure all sources of flood risk were covered including foul drainage. (Representation RPLP/2133)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
OM15.13	Paragraph 15.46	205	This can should be complemented with the provision of on-site decentralised and renewable or local carbon energy sources, which reduce the demand for mains generated electricity, and can be most effectively integrated into the design and construction of new buildings. Policy CC1 requires on-site micro-generation to be secured within new developments to support a reduction in local CO2 emissions. The widely applied Merton Rule seeks all new development with a floorspace of 500m² or one or more residential units to incorporate on-site renewable energy equipment to achieve a percentage reduction in CO2 emissions from the site. Viability testing has indicated that a 20% requirement for on-site micro-generation is generally achievable in Basildon Borough. It should be noted that the 20% requirement is calculated once energy efficiency measures to the buildings fabric have been taken into account.	Clarify how the Council justifies securing 20% on-site renewable energy generation within development proposals as sought by multiple developers. (Representations RPLP/1333, RPLP/1364, RPLP/2184 & RPLP/2227)
OM15.14	Policy CC5 – Point 1, part b	206 - 207	5. b. The design of all new development should incorporate measures for achieving high levels of energy efficiency and the use of decentralised energy sources, consistent with the requirements of policy CC1. Development is expected to demonstrate how its design, siting and layout has been maximised the opportunities for solar gain, daylight penetration, measures encompassed as part of the fabric first approach for	Clarify the Council's approach to securing the requirement for onsite renewable energy generation, distinct from energy efficiency requirements which are covered by building

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			improving the energy efficiency of the buildings fabric have been maximised and how the use of decentralised energy sources will be incorporated into the development. As a minimum: i. Residential development should achieve at least the energy efficiency requirements set out in Part L of the Building Regulations; and ii. Non-residential developments should achieve at least 50% of the credits available for reduction in CO2 emissions (Ene1) under the relevant BREEAM scheme for the development proposed; and iii. All developments of 500m² or more, or one or more residential units should incorporate further energy efficiency improvements to the fabric of the building, or on-site renewable energy equipment which reduces the predicted emissions from the development by a further 20%, calculated once building regulation compliant energy efficiency measures have been taken into account. If this percentage target is technically unfeasible, or would make the development financially unviable offsite renewable energy generation should be employed as alternative approaches.	regulations as sought by multiple developers. (Representations RPLP/1333, RPLP/1363, RPLP/ 1364, RPLP/2184 & RPLP/2227)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
OM16.1	Paragraph 16.8	210	In order to move away from a net loss of biodiversity towards achieving the measurable gains expected by the NPPF, local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. It expects particular regard to be had to those sites which sit higher on the nature conservation hierarchy. Of the greatest importance are Ramsar and Natura 2000 sites (Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). Whilst the closest of these (Benfleet and Southend Marshes SPA, and the Crouch and Roach Estuary SPA), sit outside the Borough, the Habitat Regulations Assessment which was prepared to accompany this plan identifies the potential for population growth in the Borough to have residual impacts on these coastal sites, as a consequence of recreation arising from population growth. The majority of Essex authorities are therefore working together to prepare a Recreation Avoidance and Mitigation Strategy (RAMS) to identify how the cumulative residual impacts of Local Plans across Essex can be addressed for all of the Essex coast Natura 2000 sites.	Clarification sought by ECC. (Representation RPLP/1801)
OM16.2	Policy NE1 – Point 3, part c	213	3. c. Secure a measurable net increase in biodiversity across the Borough's area with a focus on priority habitats and priority species;	Clarification sought by Essex Wildlife Trust.

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				(Representation RPLP/1836)
OM16.3	Paragraph 16.32	215	Planning policies should promote the preservation, enhancement, restoration and re-creation of priority habitats and ecological networks and minimise the impacts on biodiversity. Plans should distinguish between the hierarchy of international, national and local designation and the level of protection afforded to them should be commensurate to their status. Planning permission should be refused for development where significant harm cannot be avoided, adequately mitigated or as a last resort compensated for.	Clarification sought by ECC. (Representation RPLP/1803)
OM16.4	Paragraph 16.33	215	The NPPF states that potential and designated Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites should be given the highest level of protection. Additionally, planning permission should be refused for developments resulting in the loss of irreplaceable wildlife habitats or landscapes such as Ancient Woodlands due to their irreplaceable features. Where a proposal may affects an SPA, SAC or Ramsar site, a habitat regulation assessment may will be required in accordance with the Conservation of Habitats and Species Regulations 2010 in order to determine if the impact would be adverse, and whether options exist to avoid or mitigate harm.	Clarification sought by ECC. (Representation RPLP/1804)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
OM16.5	Paragraph 16.35	215	Although there are no International or European protected habitats within the Borough, Natura 2000 sites which comprise Ramsar, SPA and SAC sites are situated within 5km of the Borough's boundaries. These sites are designated for their inter-tidal habitats and/or the presence of rare and migratory bird species, therefore consideration must also be given to the impact that development within the Borough may have indirectly on these fragile ecosystems as harm to these sites should normally be avoided, consistent with the NPPF. The Habitat Regulations Assessment prepared to accompany the Local Plan identified a potential for population growth arising from the Borough, in combination with that arising elsewhere in Essex, to have an in-combination a cumulative impact on Natura 2000 sites through increased recreational pressure. Whilst on-site green infrastructure provision can offset some of this pressure, the coast will nonetheless be a draw to visitors as it provides an environment which cannot be replicated elsewhere. There is therefore a need for development in the Borough to ensure these recreation pressures are appropriately avoided or mitigated. Contributions to centribute towards the Essex Coast Recreation Avoidance and Mitigation Strategy (RAMS) will be required to secure this mitigation. to ensure these	Clarifications sought by ECC. (Representations RPLP/1806 & RPLP/1807)

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			recreation pressures are appropriately avoided or mitigated.	
OM16.6	Paragraph 16.37	216	Beyond designated sites for nature conservation, biodiversity can be found throughout the rural and built environment. This includes species protected by law including badgers, bats water voles and Great Crested Newts. Harm to these protected species will also need to be avoided or otherwise fully mitigated or compensated.	Clarification sought by the Environment Agency. (Representation RPLP/2649)
OM16.7	Policy NE4 - Point 1	216	Proposals which can demonstrate a resultant measurable net gain in biodiversity will in principle be supported, subject to compliance with other relevant policies in this plan.	Clarification sought by Essex Wildlife Trust. (RPLP/1838)
OM16.8	Policy NE4 - Point 2	216	2. Proposals resulting in any direct <u>adverse</u> impact to biodiversity within Ramsar sites, Special Protection Areas, potential Special Protection Areas, Special Areas of Conservation, Sites of Special scientific interest and/ <u>or</u> Ancient Woodland will be refused unless it can be shown that <u>the relevant tests which enable development to be exceptionally permitted</u> , as set out in legislation and <u>national planning policy</u> , can be met. there is an everriding public interest which necessitates that development occurring in that location.	Clarification which ensures the correct test is applied to the different types of designations, responding to representations from the Woodland Trust and Natural England.

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				(Representations RPLP/767 & RPLP/2560)
OM16.9	Policy NE4 – Point 4, part e	216	4. e. As a last resort, if the harm to biodiversity in terms of both quantity and quality have not been fully addressed through a), b), c) and d) off-site compensation which would result in a measurable net gain in biodiversity will be required. A compensation site must be identified which has the potential to be broadly equivalent to that habitat being lost, and a management plan prepared. Arrangements must be put in place to deliver that plan over a period of at least 20 years.	Clarification sought by Essex Wildlife Trust. (Representation RPLP/1838)
OM16.10	Paragraph 16.51	219	The <i>Environment Act 1995</i> gives local authorities the responsibility to periodically review and assess local air quality and where air quality objectives are unlikely to be achieved, to designate Air Quality Management Areas (AQMAs). Subsequently the local authority develops action plans aimed at reducing air pollution. As a result of the review and assessment process, three pollutants have been identified as potential threats to air quality in the Borough. They are Nitrogen Dioxide, Particulate Matter (PM ₁₀), Dust and Sulphur Dioxide (SO ₂). There are no AQMAs designated in the Borough, and industrial and residential land uses are largely separated thereby minimising potential instances of air quality conflicts. The	Clarification sought by ECC. (Representation RPLP/1809)

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			main source of air pollution in the Borough is therefore from traffic emissions, particularly along major routes and at key junctions. The <i>UK Air Quality Plan</i> identifies a stretch of the A127 where modelling indicates that EU Limit Values for Nitrogen Dioxide emissions are at risk of being exceeded up until 2023. Ongoing primary data collection is therefore underway to assess the extent of this harm and Basildon Borough Council is working with Essex County Council to develop a local action plan for reducing pollution on this stretch of road in the shortest possible time. As the type and location of new development will influence traffic generation and the pattern and volume of vehicular movement, impact on the potential for EU Limit Values to be exceeded, the Council will look to locate new development, particularly those expected to generate a large number of vehicle journeys, to the most accessible locations encouraging alternative travel by active and sustainable travel modes. It will also seek to mitigate the highway impacts of development by improving highway and junction capacity. This will help to prevent congestion which can lead to cars remaining idle or queueing in peak periods. Developers will be expected to contribute towards accessibility and junction capacity improvements as detailed in chapter 9.	
OM16.11	Paragraph 16.58	220	National policy places great importance on safeguarding the health of the environment and the public from	Reference to the most up to date guidance by

Reason for Change

Clarification by Council

to ensure Positively

			contaminated land. Part IIA of the Environmental Protection Act 1990 defines contaminated land as "any land which appears to the local authority in whose area it is situated to be in such a condition, by reason of substances in, on or under the land, that: (a) significant harm is being caused or there is a significant possibility of such harm being caused; or (b) pollution of controlled waters is being, or is likely to be caused". With regard to contaminated land and the pollution of controlled waters the Environment Agency recommends that consideration is given to their guidance on Groundwater Protection: Principles and Practice (GP3) entitled Environment Agency's Approach to Groundwater Protection 2018, the Model Procedures for the Management of Land Contamination (CLR11) and Guiding Principles for Land Contamination.	the Environment Agency. (Representation RPLP/2650)
OM16.12	Paragraph 16.70	222	Whilst most non-residential uses are considered to be suitable within 400m of water recycling centres, there may be some uses which may be affected by odour, such as offices, retail, takeaways or schools, and which may also not be appropriate within the 400m 'cordon sanitaire'.	Identification of additional receptor for odour, as set out in representation from Anglian Water. (Representation RPLP/2136)

1. Development proposals will be assessed in

accordance with the Health and Safety Executive (HSE)

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			Guidance where a new hazardous installation development is proposed, or where proposed development falls within a consultation zone for one or more hazardous installations. Where the HSE advises against development the planning application will normally be refused.	prepared test is met in relation to this policy.
OM16.14	Policy NE8 – Point 2	222	2. Anglian Water will be consulted on development proposals falling within use classes A, B1c, C and D where they fall within 400m of a water recycling centre	Identification of additional receptor for odour, as set out in representation from Anglian Water. (Representation No. RPLP/2136)
OM17.1	Paragraph 17.3	224	The NPPF recognises the importance of all heritage assets and defines them as buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, because of a heritage interest. A heritage asset includes designated heritage assets, such as listed buildings, conservation areas and scheduled monuments, and non-designated assets identified by the local planning authority, including those on a local list and on the Essex Historic Environment Record.	To provide further clarity on the evidence reporting non-designated assets, as requested by ECC. (Representation RPLP/1810)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
OM17.2	Paragraph 17.9	225	In accordance with national policy, significant weight should be given to the conservation of all designated heritage assets with nationally designated assets being awarded the highest level of protection followed by non-locally designated local assets. Development proposals should also have regard to the impact they could have on non-designated but locally important heritage assets.	Clarification which ensures the correct type of designation is being referred to, as requested by Gladman Developments. (Representation RPLP/2030)
OM17.3	Policy HE1	226	1. The Council will seek to protect, conserve and enhance the Borough's historic environment. This includes both designated and non-designated all heritage assets and their settings including Listed Buildings, historic buildings and structures, Conservation Areas, landscapes and archaeology.	Clarification, as requested by Historic England. (Representation RPLP/2172)
			2. Development proposals should be sensitively designed and should not cause harm to the historic environment. All development proposals which would have an impact on the historic environment, or any features of the historic environment, will be expected to:	
			a. Safeguard Conserve, or where appropriate enhance, the significance, character, setting and local distinctiveness of heritage assets;	
OM17.4	Policy HE2 - Point 1	227	Development within or affecting the setting of the Borough's Conservation Areas, as defined on the Policies	Change ensures that the policy better reflects

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
			Map, including views in or out, should preserve or enhance the character and or appearance of the area. Consideration must be given to the streetscape, plot and frontage sizes, materials and relationships between all existing buildings, structures and spaces. Proposals should have particular regard to the special features and key characteristics identified within the relevant character appraisal and management plan for the Conservation Area.	legislation, as requested by Historic England. (Representation RPLP/2173)
OM17.5	Paragraph 17.26. Last sentence of the paragraph.	228	The substantial harm to, or loss of a grade II Listed Building, grade I and II* registered parks or gardens would be exceptional and should still be resisted	Correction.
OM17.6	Paragraph 17.47	231	To ensure that the Borough's, as yet, undiscovered archaeological heritage is not lost, the Council will put in place measures to have potential areas of archaeological importance investigated and documented within a Heritage Statement before proposals are determined. This may be initially indicated by the identification of archaeological finds previously on the site, or in the surrounding area, as listed within the Historic Environment Record, or through other evidence supporting the Local Plan.	Provides further clarity on what evidence should be used to support the preparation of Heritage Statements, as requested by ECC. (Representation RPLP/1811)
OM17.7	Policy HE4 - Point 2	231	Scheduled Monuments and other important archaeological sites and their settings will be preserved in	Correction as requested by Historic England.

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			situ. Mitigating Mitigation measures must be taken to ensure the preservation of all remains of archaeological importance, and to avoid harm being caused to the important archaeological remains if they are to be preserved in situ. Where this is not possible proposals would need to demonstrate that the public benefits of redevelopment including securing a site's optimum viable use, outweighs the harm or loss caused by not preserving the archaeological remains in situ.	(Representation RPLP/2174)
OM17.8	Delete paragraph 17.54 and insert new paragraph after paragraph 17.52	232	17.53 For applications that are likely to impact, either directly or indirectly, on the significance of a non-designated heritage asset the local planning authority should make a balanced judgement taking into consideration the scale of any harm or loss and the significance of the heritage asset. 17.54 For all identified heritage assets, there should be a presumption in favour of their conservation and the more significant the asset, the greater the presumption in favour of its conservation should be. The loss of the asset, or harm to its significance will only be acceptable if it can be demonstrated that there are overriding public benefits and it is not viable, or feasible to retain the asset within the development.	Change to ensure compliance with NPPF, as requested by Historic England and Gladman Developments. (Representation RPLP/2030 & RPLP/2175)
OM17.9	Policy HE5 - Point 2	232	Where locally identified heritage assets are directly or indirectly affected by development proposals, their	Change to ensure compliance with NPPF,

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			significance should be retained within development wherever reasonably practicable. Where this is not practicable, consideration will be given to the scale of any harm or loss of the heritage asset and to the significance of the heritage asset when determining the application. Development resulting in harm to, or loss of significance of a locally identified asset will only be acceptable where: a. there are demonstrable and overriding benefits associated with the development; and b. any identified harm or loss to the asset is minimised through mitigation.	as requested by Gladman Developments. (Representation RPLP/2030)
OM18.1	Policies IMP1 –IMP4		Insert a Monitoring Framework – THIS IS INCLUDED AT THE END OF THIS SCHEDULE FOR CONSIDERATION	Response to representation by ECC, required to comply with National Policy. (Representation RPLP/1814)
OM18.2	Paragraph 18.12	235	In terms of identifying the requirements for obligations the Council will use the information and evidence in the Infrastructure Delivery Plan for 2018 and any subsequent updated version of the plan. This will be backed up by consultation and discussions with service providers at the time applications are made. Information was provided by the major infrastructure providers such as Essex County Council for education (including early years and childcare) and highways, the local Clinical Commissioning	Amendments sought by ECC for clarification to avoid misinterpretation. The reference to "early years childcare" should be changed to "early years and childcare" To avoid the exclusion of other early years and

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
			Group/Community Health Partnerships/NHS England for health, Anglian Water, the Environment Agency and the Lead Local Flood Authority for flood protection and water management.	childcare provision such as breakfast clubs, after school clubs etc. (Representation RPLP/1812)
OM18.3	Policy IMP1 – Point 2	234	2. In order to deliver growth on identified development sites, the Council will work with developers to bring forward development proposals that accord with the requirements of this plan. Where necessary, these proposals will need to identify any measures that need to be secured on-site to ensure the delivery of the required mix of development (including the mix of housing), the mitigation of environmental harm, and/or the provision of infrastructure as identified in the Infrastructure Delivery Plan and up to date information from infrastructure providers. Where appropriate planning conditions or planning obligations will be used to secure on-site measures.	Clarification sought by developers. (Representations RPLP/1882 & RPLP/2051)
OM18.4	Policy IMP2 – Point 1	236	New development will be expected to fully mitigate its impact on infrastructure, services and the environment. Such mitigation may be secured through a planning obligation where it is not possible to secure it through or the Community Infrastructure Levy or a planning condition, subject to an obligation meeting the	Clarification sought by ECC in order to remove the implied assumption that CIL is the mechanism of choice for. (Representation RPLP/1813)

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			requirements of the relepolicy.	evant legislation and na	tional		
OM19.1	Glossary	244	A Health Impact Assessment (HIA) seeks to identify and improve the health consequences of any defined policy or proposed development, including unintended and unanticipated consequences. A HIA includes explicit consideration of how impacts may affect different groups in the population. It includes recommendations to mitigate any harm to health and enhance any benefits. A HIA should not only identify potential harms to be mitigated but should also identify and support positive aspects of a development that bring opportunities for good health.				Other modification as requested by ECC to Include a definition of HIA in the glossary. (Representation RPLP/1815)
OM19.2	Appendix 1: Evidence Base	255	Basildon Borough Green Belt Study	Basildon Borough Council	2013		Minor Amendment as per response to remove superseded evidence from the evidence list. (Representation RPLP/2802)
OM19.3	Appendix 1: Evidence Base	255	Basildon Borough Green Belt Study Review	Basildon Borough Council	2015		Minor Amendment as per response to remove superseded evidence from the evidence list. (Representation RPLP/2802)

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						(Representation RPLP/838)
OM19.7	Appendix 1: Evidence Base	257	South Essex Playing Pitch Strategy Overarching Strategy & Action Plan	Knight Kavanagh and Page Ltd	2018	Other modification as requested by Sport England to list new playing pitch strategy and built facilities strategies in the list of evidence base. (Representation RPLP/838)
OM19.8	Appendix 1: Evidence Base	257	Basildon Council - Indoor Sports Facilities Strategy & Action Plan	Knight Kavanagh and Page Ltd	2018	Other modification as requested by Sport England to list new playing pitch strategy and built facilities strategies in the list of evidence base. (Representation RPLP/838)
OM19.9	Appendix 1: Evidence Base	257	Basildon Council - Indoor & Built Facilities Needs Assessment	Knight Kavanagh and Page Ltd	2018	Other modification as requested by Sport England to list new playing pitch strategy

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.		Propose	ed Chang	e		Reason for Change
								date evidence available, as requested by ECC. (Representation RPLP/1727).
OM19.13	Appendix 5 List of Open Spaces	273	Land South of Hannakins Farm Recreation Ground	Linda Garde ns	Billeric ay & Burste ad	Private		Minor Amendment as Semies ponse to remove pland at Linda Gardens from the schedule of pubic open spaces, as it is private land and the land owner has no intention of providing this site for public open space. (Representation RPLP/1826)
OM19.14	Appendix 5 List of Open Spaces	277	Land at Chesterford Gardens/ Craylands	Cheste rford Garde ns	Basild on	Public	Amenity G Space	Minor Amendment as Freenresponse to remove Site shown as HC5 is part of the Craylands Regeneration programme. (Representation RPLP/4965)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
OM19.15	Appendix 7: Essex SuDS Design Guide Principles and Local Standards	288	To be updated as per the Lead Local Flood Authority's revised SuDS Guidance published in 2016 and the subsequent revisions to the Revised Critical Drainage Areas (2018)	Other modification as requested by ECC to update to refer to and reflect the Lead Local Flood Authority's revised SuDS Guidance published in 2016 and the subsequent revisions to the Revised Critical Drainage Areas (2018)
OM19.16	DES2: Areas of Special Development Control	Policies Map	Amend Special Development Control Area Policy DES2 around Ramsden Bellhouse.	Factual Correction. Special Development Control Area around Ramsden Bellhouse not readjusted after removal of allocations. (Representation RPLP/1816)
OM19.17	HC5: Public Open Spaces	Policies Map	Amend boundary to Mill Meadows Nature Reserve to not include land in private ownership.	Other modification as requested by Landowner to remove land in private ownership.

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
				(Representation RPLP/3291)
OM19.18	HC5: Public Open Spaces	Policies Map	Remove land at Linda Gardens from the schedule of pubic open spaces, as it is private land and the land owner has no intention of providing this site for public open space.	Other modification as requested by Millwood Designer Homes Ltd. (Representation RPLP/1826)
OM19.19	HC5: Public Open Spaces	Policies Map	Remove Land at Chesterford Gardens ID260 from Policy HC5 as site is part of the Craylands Regeneration programme which has extant permission	Other modification as requested by Swan Housing. (Representation RPLP/4965)
OM19.20	HC5: Public Open Spaces	Policies Map	Remove Land adjacent to Laindon Link, Laindon ID246 from Policy HC5 as site is part of the Laindon Town Centre Regeneration programme which has extant permission	Other modification as requested by Swan Housing. (Representation RPLP/4965)
OM19.21	HC6: Local Green Spaces	Policies Map	Amend the two areas within LGS50 Kent View Recreation ground to include as part of HC6: Local Green Spaces.	Minor amendment to reflect the change of LDS designation as a response to (representation RPLP/24, RPLP/624)

Reference Number	Paragraph/Policy/Figure/T able/Map Reference	Local Plan Page No.	Proposed Change	Reason for Change
OM19.22	HC8: Playing Fields Associated with Education Facilities	Policies Map	Amend playing field to show the changed extent of the playing field at Beauchamps School as part of the field is no longer in the ownership of the school.	Other modification as requested by Sport England. (Representation RPLP/830)
OM19.23	HC8: Playing Fields Associated with Education Facilities	Policies Map	Remove Fryerns School playing field ID 53 from HC8 as site is part of the Craylands Regeneration programme which has extant permission	Other modification as requested by Swan Housing. (Representation RPLP/4965)
OM19.24	HC9: Private Open Spaces - Conditional Access	Policies Map	Amend to include Private Open Spaces on Policies Map HC9.	Factual Correction.

Minor Modification OM18.1 Basildon Council - Local Plan Monitoring Framework - Nov 2018

Regulation 34	Requirement	Indicator	Source
	1(a)the title of the local plans or supplementary planning documents specified in the local planning authority's local development scheme;	List of local plans or supplementary planning documents being prepared	Local Development Scheme
	1(b)(i)the timetable specified in the local planning authority's local development scheme for the document's preparation;	Timetable for the specified documents (LDS)	Local Development Scheme
(1) A local planning	1(b)(ii) the stage the document has reached in its preparation; and	Stage reached in its preparation	Local Development Scheme
authority's monitoring report must contain the following information—	1(b)(iii) if the document's preparation is behind the timetable mentioned in paragraph (i) the reasons for this; and	Reasons for delay	Local Development Scheme
	(c) Where any local plan or supplementary planning document specified in the local planning authority's local development scheme has been adopted or approved within the period in respect of which the report is made, a statement of that fact and of the date of adoption or approval.	List of documents adopted and date of adoption	Local Development Scheme
(2) Where a local planning authority	(a)identify that policy; and	List of Local Plan Policies not being implemented.	Update from Planning Policy team
are not implementing a policy specified in a local plan, the	(b)include a statement of— (i)the reasons why the local planning authority are not implementing the policy; and	Reasons for non- implementation	Update from Planning Policy team
local planning authority's monitoring report must—	(b) Include a statement of— (ii) the steps (if any) that the local planning authority intend to take to secure that the policy is implemented.	Details of steps taken to rectify non implementation	Update from Planning Policy team
(3) Where a policy specified in a local plan specifies an annual number, or	(a) in the period in respect of which the report is made, and	Net Dwelling units completed	Residential Land Availability Study

Regulation 34	Requirement	Indicator	Source
a number relating to any other period of net additional dwellings or net additional		Net Affordable Dwelling units completed	Residential Land Availability Study
affordable dwellings in any part of the local planning authority's area, the local planning authority's monitoring report must specify the relevant number for the part of the local planning authority's area concerned—	(b) Since the policy was first published, adopted or approved.	Total dwellings completed since policy adopted	Residential Land Availability Study
(4) \\(\text{\tin}\text{\tin}\text{\ti}}\\ \text{\text{\text{\text{\text{\text{\text{\text{\tex{\tex		List of Designated Neighbourhood Areas	Update from Planning Policy team
(4) Where a local planning authority have made a neighbourhood	The local planning authority's monitoring report must contain details of these documents.	Date of designation	Update from Planning Policy team
development order or a neighbourhood		Stage reached in neighbourhood plan preparation	Update from Planning Policy team
development plan		List of Neighbourhood Development Orders	Update from Planning Policy team
		the total CIL receipts for the reported year	CIL Report
		the total CIL expenditure for the reported year	CIL Report
(5) Where a local planning authority have prepared a	The local planning authority's monitoring report	the items of infrastructure to which CIL (including land payments) has been applied	CIL Report
report pursuant to regulation 62 of the Community	must contain the information specified in regulation 62(4)	the amount of CIL expenditure on each item,	CIL Report
Infrastructure Levy Regulations 2010	of those Regulations.	the amount of CIL applied to repay money borrowed, including any interest, with details of the infrastructure items which that money was used to provide (wholly or in part),	CIL Report

Regulation 34	Requirement	Indicator	Source
		the amount of CIL applied to administrative expenses pursuant to regulation 61, and that amount expressed as a percentage of CIL collected in that year in accordance with that regulation; and	CIL Report
		The total amount of CIL receipts retained at the end of the reported year.	CIL Report
(6) Where a local planning authority have co-operated with another local planning authority, county council, or a body or person prescribed under section 33A of the Act, the local planning authority's monitoring report must give details of what action they have taken during the period covered by the report.	An update on duty to cooperate	List of Organisations	Update from Planning Policy team

Strategic Objective	Strategic objective Aims	Sustainabi lity Appraisal Objective	Monitoring Indicator	Target/ Trend	Source	Policy Covera ge	
			Population	N/A	ONS		
			Average House Prices	N/A	Hometrack		
Contextual Indicators	Provide background information		First time buyers seeking to buy homes (Number of entries on the Basildon Council Help to Buy Register)	N/A	Basildon Borough Council		
200	Enhance the quality of the Borough's natural, historic and built environment through spatial planning and design, conservation of heritage assets, and the improvement of the character and appearance of its landscapes, including green corridors, to secure the future of the	SA1	Ha of new Green Infrastructure secured through development	N/A	S.106 Contribution report.	NE1, IMP2	
		environment through spatial planning and	SA1	Area of country park provision	N/A	Basildon Borough Council	NE2
SO1: Protecting		SA1	S.106 contributions to open space	N/A	Basildon Borough Council	HC5, IMP2	
and Enhancing the Quality of the Local Environment		SA1	Area of open space provision.	N/A	Basildon Borough Council	HC5, HC6, HC7, HC8, HC9	
	Borough's distinctiveness and sense of place.	SA2	Number of Listed Buildings	No decrease	Historic England	HE1, HE3	
	sense or place.	SA2	Number of Scheduled Monuments	No decrease	Historic England	HE1, HE4	

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Strategic Objective	Strategic objective Aims	Sustainabi lity Appraisal Objective	Monitoring Indicator	Target/ Trend	Source	Policy Covera ge	
	Protect, conserve, increase and positively manage the Borough's biodiversity resources through the protection,	SA2	Number of Listed Buildings on the Essex Heritage at Risk Register	Decrease, with the target of Nil	Historic England and Essex County Council Heritage at Risk Registers (HARR)	HE1, HE3	
	renewal and creation of habitats and green infrastructure opportunities.	SA2	Number of heritage assets in the Borough on the Essex Heritage at Risk Register (HARR) for more than 5 years	Decrease, with the target of Nil	Historic England and Essex County Council Heritage at Risk Registers (HARR)	HE1	
		SA2	Ha of Ancient Woodland	No decrease	Natural England	NE4	
		SA3	Number and hectares of SSSIs	No decrease	Natural England	NE4	Zevisec
		SA3	% of Boroughs SSSIs in a favourable stable/improving condition	N/A	Natural England	NE4	Nevised Fublication Local Fian
		SA3	% of Boroughs SSSIs in a unfavourable declining condition	N/A	Natural England	NE4	בטכמו רומו
		SA3	% of Local Wildlife Sites (LoWS) under positive management	Increase	EECOS, Basildon Borough Habitat and Biodiversity Report, with annual monitoring of change by Basildon Borough Council	NE3	l Statement of Co

Revised Publication Local Plan Statement of Consultation

	Strategic Objective	Strategic objective Aims	Sustainabi lity Appraisal Objective	Monitoring Indicator	Target/ Trend	Source	Policy Covera ge
			SA3	Number and Ha of Local Wildlife Sites (LoWS)	No net decrease	Essex Wildlife Trust	NE3
			SA3	Area of new (additional) land brought under management for nature conservation purposes.	Increase	Basildon Borough Council	NE1
200	SO2: Improve the Quality and Value of the Green Belt Green Belt Ensure the Borough's Green Belt continues to serve its purposes, whilst accommodating Objectively Assessed Needs. Pro-actively manage the use of land in the Green Belt so that it benefits local communities. Continue to enforce against unauthorised development.	SA1	Ha of Green Belt Land	Maintain at least 59 ha	Basildon Borough Council	GB1, GB2	
		Pro-actively manage the use of land in the Green Belt so that it benefits local communities. Continue to enforce against unauthorised	SA1	Proactively manage the use of land in the Green Belt (Ha of open space located in the Green Belt)	N/A	Basildon Borough Council	GB3, GB11
			SA1	Net dwelling completions on Green Belt infill	Not more than 135 Net dwelling completions over the plan period	Residential Land Availability Monitoring	GB4

Strategic Objective	Strategic objective Aims	Sustainabi lity Appraisal Objective	Monitoring Indicator	Target/ Trend	Source	Policy Covera ge	
SO3: Minimise our Impact on the Environment Designing local environments so that they are of a high quality, more resilient to a changing climate and benefit from integrated environmental systems for drainage and waste	use of resources by embracing sustainable patterns of	SA12	Proportion of net dwelling completions on brownfield sites	N/A	Residential Land Availability Monitoring	SD1, SD2, H1, H23	
	maximising the use of previously developed land, improving energy	SA12	Proportion of net dwellings completed at densities of 30 duph or more	95%	Residential Land Availability Monitoring	SD1, SD2, H1	
	increasing the use of renewable energy technologies and minimising pollution, including greenhouse gas emissions. Designing local environments so that they are of a high	SA12	Employment completions on brownfield sites	N/A	Non Residential Land Availability Monitoring	SD1, E1	Revise
		SA13	Major Planning Applications approved, where the Environment Agency has an Outstanding Objection on Flood Risk Grounds	Nil	Environment Agency	CC2, CC4	ed Publication Loca
	to a changing climate and benefit from	SA13	Major Planning Applications approved, where the Lead Local Flood Authority has an Outstanding Objection on Flood Risk Grounds	Nil	Basildon Borough Council	CC2, CC4	Revised Publication Local Plan Statement of Consultation
							of Consultation

	Strategic Objective	Strategic objective Aims	Sustainabi lity Appraisal Objective	Monitoring Indicator	Target/ Trend	Source	Policy Covera ge
		Ensuring people can be protected from the effects of flooding.	SA16	Water pollution incidents recorded by Environment Agency	Decrease, with the aim of Nil	Environment Agency	CC1
6/10		Improve water quality.	SA15	Air Quality (Nitrogen Dioxide concentrations)	Maintain below 40 µgm-3/yearly mean	Basildon Council Air Quality Annual Status Report (ASR)	NE6
			SA17	Proportion of new homes completed on sites with an approved SUDs scheme.	Increase	Basildon Borough Council	CC2
	SO4:	Maintain Basildon Town Centre's role as a Regional Centre by ensuring it contributes	SA5	Number of Town centre vacant retail units	Decrease	Shopping frontage/Retail Survey	SD1, R1, R2, R3, R4, R5
	Creating Vibrant and Thriving Town Centres	to the Borough's overall growth targets and becomes the prime focus for new retail and leisure developments. Conserve the distinct	SA5	Net additional square metres of total retail floor space	Comparison floor space – 24,100 over the plan period Convenience floor space – 4,900sqm over the plan period	Non Residential Land Availability Monitoring	SD1, R1

Strategic Objective	Strategic objective Aims	Sustainabi lity Appraisal Objective	Monitoring Indicator	Target/ Trend	Source	Policy Covera ge
	identities of the Borough's other town centres, whilst improving their local community roles and functions through	SA5	Gross additional food and drink (A3, A4 and A5)	9,300sqm over the plan period	Non Residential Land Availability Monitoring	R1
	mixed-use developments that provide a better range of shopping, leisure, educational and employment opportunities, alongside an enhanced transport infrastructure and public realm.	SA5	% of shop units that comprise hot food takeaways (use class A3) within town centres	No more than 10% of shop units should comprise hot food takeaways	Shopping frontage/Retail Survey	R16
		SA5	% of shop units that comprise hot food takeaways (use class A3) within local centres	a. Within local centres comprising 6 or less shop units, no more than 50% of the shop units should comprise hot food takeaways; b. Within local centres comprising 7 to 14 shop units, no more than 30% of the shop units should comprise hot food takeaways; and	Shopping frontage/Retail Survey	R16

	Strategic Objective	Strategic objective Aims	Sustainabi lity Appraisal Objective	Monitoring Indicator	Target/ Trend	Source	Policy Covera ge
					c. Within local centres comprising 15 or more units, no more than 20% of the shop units should comprise hot food takeaways.		
1			SA5	% of A1 Use Class within town centre retail frontage	1. Within Primary shopping frontage A1 retail uses at ground floor level should not fall below: i. 75% in Basildon town centre; or ii. 60% in Billericay, Pitsea or Wickford town centres. 2. And 30% within Secondary shopping frontage for all town centres	Shopping Frontage/Retail Survey	R8, R9
			SA5	Distance between betting offices (Applies to new applications only)	400m buffer zone	Non Residential Land Availability Monitoring	R17

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	Strategic Objective	Strategic objective Aims	Sustainabi lity Appraisal Objective	Monitoring Indicator	Target/ Trend	Source	Policy Covera ge	
			SA5	Net Dwelling completions per annum within town centres	Basildon Town Centre up to around 2,128 dwellings Laindon Town Centre – at least 224 dwellings Wickford Town Centre – 15-100 dwellings	Residential Land Availability Monitoring	R2, R3, R5	77
	SO5: Strengthenin g the	Maintain the Borough's position as a subregional economic hub by providing enough land, in suitable locations, with	SA4	Net additional square metres of Office space (B1a)	N/A	Non Residential Land Availability Monitoring	SD1, E1, E2, E7, E11, E14	Revised Publication Local Plan
	Competitiven ess of the Local Economy	supporting infrastructure to accommodate business needs, both big and small, and support the diversification of the Borough's employment	SA4	Net square metres of B1b Research and Development	N/A	Non Residential Land Availability Monitoring	E3	ocal Plan
EC	Lectionity		SA4	Net square metres of General Industrial Development (B2-B8)	N/A	Non Residential Land Availability Monitoring	SD1, E1- E8	Statement o
								Statement of Consultation

Strate Object		Strategic objective Aims	Sustainabi lity Appraisal Objective	Monitoring Indicator	Target/ Trend	Source	Policy Covera ge
	Impro robus econd	sector mix. Improve the robustness of the local economy by ensuring opportunities to	SA4	Net square metres of B class uses lost to Non B-Class Uses in B class Employment Areas	N/A	Non Residential Land Availability Monitoring	E10
		maintain and enhance business support programmes, access to early, primary, secondary, further & higher education and skills training are available to improve investor confidence in locating to or remaining in the Borough.	SA4	Economic productivity - GVA	Maintain Basildon's position as the dominant economic area within South Essex	ONS	SD1, E1, E13
		Promote the Borough on a local, national, European and international scale as an attractive base for businesses.	SA4	Unemployment rates	Decrease	ONS	SD1, E1, E11
SO6: Deliver New Ho	_	Identify enough suitable land for new housing to meet	SA7	5 Year Housing Land Supply (Expressed as a % and Years)	5 years	5 Year Housing Land Supply Report	SD1, H1

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Strategic Objective	Strategic objective Aims	Sustainabi lity Appraisal Objective	Monitoring Indicator	Target/ Trend	Source	Policy Covera ge
	Objectively Assessed Needs. Provide sufficient housing, in a range of types and tenures that meet the Borough's needs, including specialist provision.	SA7	Net Dwelling completions per annum	15,465 dwellings over the plan period	Residential Land Availability Monitoring	SD1, H1
		SA7	Net Dwelling completions by area	As identified in the Local Plan	Residential Land Availability Monitoring	SD2
		SA7	Net Dwelling completions by housing allocation	Targets in individual allocation policies H5 – H22	Residential Land Availability Monitoring	H5 - H22, SD3
			Units of specialist accommodation (use class C3) completed for vulnerable adults (excluding older people).	N/A	ECC Adult Social Care	H2
		SA7	Units of specialist housing accommodation (use class C2) completed for Older	1,491 units over the plan period	Residential Land Availability Monitoring	H2

Strategic Objective	Strategic objective Aims	Sustainabi lity Appraisal Objective	Monitoring Indicator	Target/ Trend	Source	Policy Covera ge
			People and Disabled Adults			
		SA7	Residential care / nursing beds (use class C2) provided for older people.	598 bed spaces over the plan period	Residential Land Availability Monitoring	H2
		SA7	Affordable dwelling completions expressed as a percentage of total dwelling completions on developments of 11 units or more.	31% affordable housing provision will be required on all sites of 11 units or more	Residential Land Availability Monitoring	H26
		SA7	Affordable homes secured via S106 expressed as a percentage of total homes granted permission on sites of 11 units or more	31% affordable housing provision will be required on all sites of 11 units or more	Residential Land Availability Monitoring	H26
		SA7	Affordable Housing need	Decrease	Basildon Borough Council – Housing Strategy Evidence Base Annual Review	SD1, H1
		SA7	Gypsy & Traveller pitches granted consent	44 pitches over the plan period	Residential Land Availability Monitoring	H3, H4

Strategic Objective	Strategic objective Aims	Sustainabi lity Appraisal Objective	Monitoring Indicator	Target/ Trend	Source	Policy Covera ge
		SA7	Travelling Show people plots granted consent	3 plots over the plan period	Residential Land Availability Monitoring	H3, H4
		SA7	Total number of Traveller pitches with permanent planning permission	Total number of existing pitches plus new pitches granted consent	Residential Land Availability Monitoring	H3, H4
SO7: Capitalising on Local Tourism Opportunitie s	Extend the Borough's leisure tourism offer by promoting its cultural and environmental assets. Securing the provision of high quality accommodation and support facilities in the Borough to satisfy demand for businesses.	SA4	Net Square metres of hotel (C1) floor space (Granted Planning Permission)	Increase	Non Residential Land Availability Monitoring	SD1, E1, R13
SO8: Helping	Provide an environment that is	SA8	Obesity rates of adults and children	Decrease	Sport England Local Sport Profiler	HC1
Local People Maintain	attractive, enjoyable, safe, accessible and	SA11	% of adult participation in sport	Increase	Sport England Local Sport Profiler	HC1, IMP2

Strategic Objective	Strategic objective Aims	Sustainabi lity Appraisal Objective	Monitoring Indicator	Target/ Trend	Source	Policy Covera ge
Healthier Lifestyles	easy to live and work in.	SA11	S.106 contributions secured for investment in leisure facilities.	As per requirements of the Infrastructure Delivery Plan (IDP)	Basildon Borough Council	HC1, IMP2
	Ensure access to leisure, sport, recreation and cultural facilities is maintained to encourage active and healthier lifestyles.	SA11	Change in Ha of Open Space/ 1000 people	7.52ha of open space per 1000 residents	Basildon Borough Council	HC5, HC6, HC7, HC9, HC11
	Foster a dynamic and prosperous local economy, employing a	SA11	Change in the provision of Community Facilities (sqm)	N/A	Basildon Borough Council	HC4, HC10, HC11
SO9: Enhancing the Quality of	highly trained, skilled and educated local workforce. Reduce inequalities in	SA2	S.106 contributions secured for investment in art and culture	As per requirements of the Infrastructure Delivery Plan (IDP)	Essex County Council	DES6, IMP2
the Quality of Life for All	Reduce inequalities in employment by improving access to all levels of education, training and skills enhancement.	SA6	Net additional square metres of educational floor space by primary, secondary, further, higher, and vocational levels.	As per requirements of the Infrastructure Delivery Plan (IDP)	Basildon Borough Council	НСЗ

Strategic Objective	Strategic objective Aims	Sustainabi lity Appraisal Objective	Monitoring Indicator	Target/ Trend	Source	Policy Covera ge
	Addressing social exclusion and inequality in healthcare and education by ensuring good quality health, education and community support and cultural facilities are accessible to the Borough's residents of all ages. Improve access to, and the provision of community, sports and cultural facilities, together with sufficient local infrastructure to ensure healthier and stronger communities develop. Nurture stronger and safer communities, increasing peoples' safety and well-being by designing out crime,	SA6	Capacity in primary and secondary schools	N/A	Commissioning School Places Report (Essex County Council)	HC3
		SA6, SA8, SA11	S.106 contributions secured for a) education, b) health and c) communities services	As per requirements of the Infrastructure Delivery Plan (IDP)	Essex County Council	HC2, HC3, HC4, HC10, HC11, IMP2
		SA6, SA8, SA11	Average minimum travel time to 8 key services by public transport	New developments to be within 30 minutes public transport travel time of key services	https://www.gov.uk/government /statistical-data-sets/journey- times-to-key-services-jts01	H1, IMP1, IMP3
		SA7, SA8, SA9, SA10, SA11	Performance against index of multiple deprivation	Reduce deprivation levels	https://www.gov.uk/government /statistics/english-indices-of- deprivation-2015	SD1, H1, H2, E1, HC1

Strategic Objective	Strategic objective Aims	Sustainabi lity Appraisal Objective	Monitoring Indicator	Target/ Trend	Source	Policy Covera ge
	reducing disorder and its causes, encouraging community involvement and instilling civic pride.					
	Ensure that all developments are in accessible locations to minimise the need to travel.	SA11	% of population within 30 minute public transport time of key services	95%	https://www.gov.uk/government /statistical-data-sets/journey- times-to-key-services-by-local- authority-jts04	T4, IMP3
SO10: Securing the Delivery of Supporting Infrastructure	Promote a reduction in car use and out commuting where possible and encourage the use of	SA11	S.106 contributions accumulated per annum for Improvements to Public Transport Infrastructure & Services	As per requirements of the Infrastructure Delivery Plan (IDP)	Essex County Council	T4, CC1, IMP1, IMP2
	public transport, walking and cycling to minimise the impact of the Borough's growth on transport infrastructure.	SA19	S.106 contributions accumulated per annum for highway works	As per requirements of the Infrastructure Delivery Plan (IDP)	Essex County Council	T1, T2, T3, TS5, T6, IMP1, IMP2

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Strategic Objective	Strategic objective Aims	Sustainabi lity Appraisal Objective	Monitoring Indicator	Target/ Trend	Source	Policy Covera ge
	Ensure all developments are supported by the necessary transport, utility, green, education, health and	SA19	List of key routes where work is underway or completed, compared to IDP	100% completion of works listed in IDP by end of plan period.	Essex County Council	T1, T2, T5, T6, IMP1
	community infrastructure in an effective and timely manner to make the development sustainable and minimise its effect upon existing communities.	SA19	CIL contributions (Information provided in Section A)	As per requirements of the Infrastructure Delivery Plan (IDP)	Basildon Borough Council	T1, COM1, HC1, IMP1