

# **Local Plan Core Strategy Revised Preferred Options**

## **Statement of Consultation**

**August 2014**

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# 1 Introduction

1.1 This Statement of Consultation sets out how Basildon Borough Council undertook its consultation process on the Local Plan Core Strategy Revised Preferred Options. The report demonstrates how, when and who it consulted; as well as providing a summary of the results of the public consultation. It also includes a summary of the earlier consultations on the Local Plan Core Strategy which informed the Revised Preferred Options.

# 2 Consultation Requirements

2.1 The consultation of the Local Plan Revised Preferred Options and the preparation of this Statement of Consultation are in accordance with the Planning and Compulsory Purchase Act 2004, the Localism Act 2011, the Town and Country Planning (Local Development) (England) Regulations 2012, the National Planning Policy Framework 2012 and Basildon Borough Council's Statement of Community Involvement (SCI) 2011. The latter has also taken into account the Planning Practice Guidance 2014.

2.2 Paragraph 155 of the National Planning Policy Framework (NPPF) states that "early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made".

2.3 Regulation 18 of the Town and Country Planning (Local Development) (England) Regulations 2012 specifies the consultation a Local Planning Authority must undertake when preparing a Local Plan. It states the following:

(1) A local planning authority must-

- a. notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
- b. invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are-

- a. such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
- b. such of the general consultation bodies as the local planning authority consider appropriate; and
- c. such residents or other persons carrying on business in the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

2.4 The report also shows that the consultation and public engagement was carried out in line with the approach set out in Basildon Borough Council's adopted Statement of Community Involvement (SCI) 2011. The 2011 SCI is the first revision to the 2009 SCI and reflects changes in national legislation. The SCI specifies the consultation process for planning procedures within Basildon Borough Council, including the preparation of local planning policy.

## **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. Planning Regulations will set out the minimum requirements for consultation. The Council will meet these, but hopes to exceed them;
3. The Council will make efforts to encourage those whose are seldom heard to make their views known, including through social media, focus groups or face to face meetings;
4. In order to facilitate participation, it will attempt to engage more people by:
  - a. Holding events at different times (day times, weekends and evenings, etc.);
  - b. Ensuring venues are accessible to people with disabilities (transport access as well as physical access to the building or its facilities);
  - c. Providing facilities such as induction loops for people with hearing aids;
  - d. Providing option for documents to be available in different formats;
  - e. Undertaking awareness raising at appropriate stages of plan preparation. This may be through public meetings, group sessions, community forums, programmed press releases, etc.;
  - f. Holding focussed consultation/participation sessions in the community (e.g. women only sessions) or to those with a special interest (e.g. natural history societies); and
  - g. Writing documents in plain English and providing glossaries where this is not possible due to technical language.

## **2.6** The SCI also required, as a minimum, that the public and stakeholders are consulted on realistic and meaningful options and the regulatory assessments (consisting Sustainability Appraisal/ Strategic Environmental Assessment/ Habitat Regulations Assessment and Service Impact Assessment).

## **3 Previous Consultations on the Local Plan Core Strategy**

- 3.1** Previous to the consultation on the Local Plan Core Strategy the Council undertook public engagement through consultation events at earlier stages in the production of the Core Strategy. This ensured that the needs and concerns of the community could be identified and reflected in the preparation of the Local Plan.
- 3.2** Basildon Borough Council published an Issues Report for consultation between October and November 2007 which asked 45 questions on a range of different matters for the Borough. 2,177 comments were received by 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.
- 3.3** In light of the comments received 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.
- 3.4** The Preferred Option for future development of the Borough, as chosen by the Council, was based on maximizing urban potential and protecting the Green Belt. This option valued the Green Belt above 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, individual Primary Areas for Development and Change, 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 by 370 consultees including an area specific petition of 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 but statutory bodies, developers and partners felt that the scale of growth was not in line with national policy and guidance. Consequently, the scale of growth proposed in the Core Strategy Preferred Options would not be found sound at an Examination in Public.

## **4 Consultation on the Revised Preferred Options**

- 4.1** On the 19<sup>th</sup> December 2013, Council approved the formal consultation of the Local Plan Core Strategy Revised Preferred Options. The public consultation on the Revised Preferred Options, including the associated technical documents, such as the Sustainability Appraisal, Strategic Environment Assessment, Habitats Regulations Assessment and Service Impact Assessment prepared in accordance with the relevant legislation, commenced on the 20<sup>th</sup> January 2014 for eight weeks.
- 4.2** During the consultation a decision was taken by the Council to extend the consultation period by a further two weeks to 1<sup>st</sup> April 2014 when it became apparent that different areas in the Borough had either not heard about the consultation in time, or felt they needed more time to properly consider it before responding.
- 4.3** In order to raise public awareness of the consultation extension, the Council carried out a series of additional advertising which are documented in the following section. Notification letters were also sent to everyone on the Local Plan database and to all those who had already submitted a response, informing them that they had more time to submit additional comments.
- 4.4** Basildon Council's Local Plan process is referred to as 'Basildon2031' and all publications, correspondence and advertising associated with the Local Plan Core Strategy Revised Preferred Options included the 'Basildon2031' branding. This provided continuity and assisted in the campaign to raise public awareness of the Local Plan Core Strategy and the consultation events.

## **5 Consultation Procedure**

- 5.1** The Council went over and above publicity requirements of the relevant Regulations and the Council's adopted Statement of Community Involvement 2011. The publicity included sending letters to residents, local business and statutory consultees registered on the Council's planning policy consultation database; placing adverts in the local press, at train stations and both within, and on the back of Borough buses. An advert was also stationed in a high footfall location in Basildon's Town Square for selected weeks to raise the consultation's profile.

- 5.2** Eight public roadshows were held during January and February visiting Billericay, Wickford, Basildon, Laindon and Pitsea. The Council also held a Parish Council liaison group meeting on the 9<sup>th</sup> January 2014, and a special Business Breakfast for local businesses on 4<sup>th</sup> February 2014. Officers also attended several forums, external meetings (e.g. Basildon Business Group, Disability Forum, Wildlife and Countryside Forum, etc.) and two Parish Council meetings (following invitations) in Little Burstead and Bowers Gifford and North Benfleet to present the plan, its proposals, and answer any questions. The consultation employed more forms of advertising than the previous consultation on the Preferred Options to try to increase public participation.
- 5.3** All documentation was made freely available on the Council's dedicated webpage [www.basildon.gov.uk/basildon2031](http://www.basildon.gov.uk/basildon2031). It was also viewable at local libraries, the Basildon Centre, and at the eight public roadshows held around the Borough. Parish Councils were also provided with a full suite of documentation and promotional material. Documents were available to purchase on request. The following methods of communication and engagement were carried out:
- Media releases;
  - Advertisements;
  - Notification Letters / Emails;
  - Use of website;
  - Posters / Leaflets;
  - Provision of hard copies;
  - Social Networking;
  - Internal Communications;
  - Article in Borough Diary;
  - Business e-Bulletin & Foundations Newsletter;
  - Business Breakfast;
  - Briefings – including Hard to reach groups; and
  - Exhibitions / Roadshows.

#### Media Releases

- 5.4** The media is a key publicity tool and local media sources were used to broadcast the consultation on the Local Plan Core Strategy Revised Preferred Options. The Council issued its first press release on the 10<sup>th</sup> December 2013 prior to the release of the Local Plan Core Strategy Revised Preferred Options Report to Cabinet. This press release was picked up by a number of local newspapers who subsequently published stories on the information contained within it. Follow up press releases by the Council were then issued in December, January, February and March 2014 providing updates on the consultation. They were all picked up by local newspapers and a number of stories were published. The last Council press release on the 11<sup>th</sup> March 2014 publicised the two week extension to the consultation in advance of the original consultation deadline.
- 5.5** The local newspapers, namely the Basildon Echo, the Billericay and Wickford Gazette, the Basildon Yellow Advertiser and the Essex Enquirer, championed the consultation by running several news stories relating to the Local Plan Core Strategy. The information contained in these news stories originated both from the Council press releases and from other sources such as residents and Parish/ Town Councils. Although the stories were mixed in terms of opinions they all helped to raise the profile of the Local Plan Core Strategy Revised Preferred Options and the consultation. News stories ran continuously throughout the consultation period with the first being released on 6<sup>th</sup> December 2013 which was 6 weeks prior to the start of the consultation.
- 5.6** Local radio was also used to publicise the consultation. On Monday 23<sup>rd</sup> December the Leader of the Council at the time, Councillor Ball, gave an interview with Southend Radio to announce that the Local Plan Core Strategy Revised Preferred Options Report had been approved by the Council and that a consultation event would follow shortly. The interview was mentioned on air 12 times throughout that day. A second radio interview was given by

Councillor Moore, the Cabinet Member for Planning on BBC Essex on Tuesday 4<sup>th</sup> February. Background information on the need for a Local Plan was discussed along with details of the consultation and the Business Breakfast being held that day. This interview was mentioned on air 20 times throughout that day in news bulletins.

### Advertisements

- 5.7** During the consultation several advertisements were placed in local newspapers which are distributed to a large number of households and business in the Borough. These were half page and double page adverts which provided information on the key messages of the Revised Preferred Options and the consultation. Following the decision to extend the consultation, further half page adverts stating the new consultation deadline were placed in the local newspapers. Examples of the adverts can be found in Appendix A.
- 5.8** The Council expanded the advertising campaign from the previous Preferred Options consultation to include public transport and Basildon town centre advertising. The aim was to bring the consultation to the attention of residents who are unlikely to receive local newspapers and to people who work or visit the Borough. Adverts were placed at main train stations for two weeks starting the week commencing 10<sup>th</sup> February. Adverts were also placed on Route 100 buses, both on panels at the rear of the buses, and on interior advert panels for the same two week period.
- 5.9** An ad trailer within Basildon's Town Square was also used to further advertise the consultation event for one week from Saturday 15<sup>th</sup> February and then for another week from Saturday 22<sup>nd</sup> March to notify the public of the two week extension. Photographs of the public transport adverts and the town centre ad trailer can be found in Appendix A.

### Notifications Letters / Emails

- 5.10** Notification letters and emails were sent to everyone on the Local Plan consultation database mailing list. This included the statutory consultees and all those who had responded to previous consultation events on the Local Plan. A list of who was contacted as per the Regulations<sup>1</sup> can be found in Appendix B. The letters and emails raised awareness of the consultation, the road shows and the various ways to submit a response. Letters and emails were sent out at the start of the consultation and further letters and emails were sent shortly after the decision was made to extend the consultation. Copies of both letters can be found in Appendix C.
- 5.11** In addition to the Local Plan mailing list, letters were sent to Borough residents by the Leader of the Council at the time and the Cabinet Member for Planning. The intention of the letter, dated 2<sup>nd</sup> January 2014, was to encourage resident participation by directly informing them about the Local Plan, its consultation, and the dates and locations of the roadshows. A copy has been included in Appendix C. Whilst the letter proved to be beneficial in raising general residents' awareness of the consultation, it became apparent that not all residents around the Borough had received the letter. Consequently, the decision to extend the consultation for an additional two weeks was made by the Council. Residents who had not received the letter in the first instance, and who gave the Council their details, were resent the letter. Copies of the letter were also made available at the roadshows and given to the Parish/ Town Councils.

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<sup>1</sup> Regulation 2 (1) of the Town and Country Planning (Local Planning) (England) Regulations 2012

### Use of website

- 5.12** The Council's website reported the consultation event. A separate area within the Planning webpages of the Council's website was created solely for the purpose of the consultation on the Revised Preferred Options. The web address was [www.basildon.gov.uk/basildon2031](http://www.basildon.gov.uk/basildon2031) and it was named 'Basildon 2031' in line with the consultation branding to ensure it was easily identifiable and to maintain consistency. The newsreel on the Council's homepage supplied a direct link to the Basildon 2031 webpages from which copies of all the consultation documents could be downloaded. There was also a direct hyperlink to the consultation portal for people to make their comments online.

### Posters / Leaflets

- 5.13** A3 and A4 posters and A5 leaflets were distributed to local libraries and to all Parish/Town Councils. The idea being that they would be put up on local notice boards or on stands highlighting the consultation and the roadshows. Revised posters advertising the extension to the consultation replaced the original posters in these locations. For consistency and recognition, the posters and leaflet were of a similar branding to the advertisements and are shown in Appendix D.
- 5.14** The 8 page leaflet provided a summary of the Local Plan Core Strategy Revised Preferred Options Report including diagrams and key statistics which the public could take away with them. The 11 consultation questions were included in the leaflet under the summary sections to which they related, and details on the consultation were printed on the back page to encourage public participation. A separate leaflet was produced for the Youth Council to give to its members.
- 5.15** A-boards were also produced for the roadshows and placed outside each venue on the day of the roadshow to advertise the event and invite the public in.

### Provision of hard copies

- 5.16** The Council provided hard copies of the Local Plan Core Strategy Revised Preferred Options Report and accompanying technical studies and statutory assessments free of charge for reference in the local libraries of Basildon, Billericay, Laindon, Pitsea and Wickford; in the reception area of the Basildon Centre (the Council Offices); and at all roadshow events. At each of these locations leaflets, comment forms and Frequently Asked Questions (FAQ) handouts were also freely available to take away and they were replenished throughout the consultation period. Hard copies of the Local Plan Core Strategy Revised Preferred Options Report were also available to buy on request from the Council and this was publicised in the notification letters and the leaflet.

### Social Networking

- 5.17** The Council's Facebook and Twitter accounts were used to publicise the consultation and roadshows. Messages were sent out throughout the consultation period linking back to the Basildon 2031 home page.

### Internal Communications

- 5.18** Internal communication activities such as all staff emails, The Staff Bulletin, the Leader's message, and the Chief Executive's blog were sent out during the consultation period to engage with Council staff, and to help them pass on information through word of mouth. A drop-in session was also held for members of staff at the Basildon Centre on Thursday 13<sup>th</sup> February from 11.30am to 2.30pm across the lunchtime period. This was publicised in



advance in an extra all staff email, and through advertising on the internal computer network desktop wallpaper.

- 5.19** All tiers of management were sent updates on the consultation and the Members' Bulletin published week commencing 20<sup>th</sup> January provided key information on the consultation.

#### Article in Borough Diary

- 5.20** A double page article on the Revised Preferred Options consultation was published in the Spring 2014 edition of the Borough Diary which was delivered to households, local shopping and library outlets in the Borough. The article included questions and answers by the Cabinet Member for Planning, key facts and figures and information on how to submit comments.

#### Business e-Bulletin & Foundations Newsletter

- 5.21** To raise awareness of the Local Plan Core Strategy and the consultation within the local business community the Council published an article in the January 2014 edition of the Council's monthly Basildon Business e-Bulletin which also provided details of the forthcoming Business Breakfast. The e-Bulletin was sent to more than 900 locally based businesses across the Borough. A similar article was placed in the Winter 2013/2014 edition of the 'Foundations' which is a business newsletter produced quarterly by the Council and distributed to over 3,000 local businesses.

#### Business Breakfast

- 5.22** To engage with businesses based within the Borough, the Council organised a special business breakfast on Tuesday 4<sup>th</sup> March at the Holiday Inn, Basildon. The Cabinet Member for Planning and Council Officers gave a presentation on the Local Plan Core Strategy Revised Preferred Options and were on hand afterwards for a planning related surgery. The event built on earlier briefing sessions given to the Basildon Regeneration Partnership and the Basildon Business Group, but was publicised more widely and open to all businesses within the Borough. The event was publicised on the Council's website within the Basildon 2031 consultation pages, through a news release, and in articles in the e-Bulletin and the Foundations newsletter.

#### Briefings

- 5.23** The Council provided briefing sessions during the consultation period for various groups and forums, including hard to reach and community groups. The majority of these briefings coincided with regular group/forum meetings, but where this was not possible or suitable, the Council offered to arrange separate briefing sessions, or to send a briefing note and leaflets to the group/forum for dissemination.
- 5.24** Officers attending the meetings gave presentations on the Local Plan Core Strategy and informed attendees how they can submit comments. The style of the presentation varied between groups as it was given in the method tailored to meet the needs of the group/forum. Leaflets, comment forms and FAQs were available to take away from all meetings and there was an opportunity to ask questions either during, or at the end of the presentation. A list of briefings attended can be seen in Table 1. The LGBT Forum and the Billericay Youth Council were also approached by the Council, but did not respond with a meeting date. These two groups were instead sent information on the consultation.

**5.25** The questions and concerns raised during the various meetings have been captured in the main issues set out in section 8. They reflected similar concerns that were submitted as written representations.

**Table 1: Briefings attended**

Date	Briefing attended
Thursday 9 January	Local Councils' Liaison Meeting
Thursday 16 January	Local Service Partnership / Basildon Regeneration Partnership Meeting
Wednesday 22 January	Disability Forum
Monday 27 January	Basildon Business Group
Wednesday 29 January	Basildon Borough Wildlife and Countryside Forum
Thursday 6 February	Basildon Borough Youth Council
Wednesday 26 February	Bowers Gifford and North Benfleet Parish Council
Wednesday 5 March	Basildon Bankers, Accountant, Surveyors, Solicitors Group Meeting
Thursday 6 March	Little Burstead Parish Council
Thursday 13 March	Basildon Council for Voluntary Service
Thursday 6 March	Women Together Group

#### Roadshows / Exhibitions

**5.26** The Council held eight roadshows in five locations across the Borough which were all very well attended. Officers were on hand to explain the display boards and answer questions, and there was free consultation summary material and FAQs available to take away. The comments raised at the roadshows are reflected in the representations submitted to the consultation and which are summarised in Section 8 of this statement. Details of when and where the roadshows were held can be seen in Table 2 below.

**Table 2: Roadshows**

Area	Date	Time	Venue
Pitsea	Monday 27 January	1pm-8pm	The Place, Pitsea Leisure Centre
Billericay	Thursday 6 February	1:30pm-8pm	Billericay Reading Rooms, High Street
	Saturday 8 February	10am-4pm	Billericay Reading Rooms, High Street
Wickford	Tuesday 11 February	1pm-8pm	Bar Plazma, High Street, Wickford
	Saturday 15 February	10am-4pm	Bar Plazma, High Street, Wickford
Basildon	Wednesday 19 February	10am-5pm	Eastgate Shopping Centre, Basildon
	Saturday 22 February	10am-5pm	Eastgate Shopping Centre, Basildon
Laindon	Friday 28 February	1pm-8pm	Laindon Community Centre, Aston Road

**5.27** The Council also provided a permanent exhibition in the Basildon Centre throughout the entire consultation period up to 1<sup>st</sup> April. Display boards were set up in a prominent place in the reception area showing the same information which was presented at the roadshows. Hard copies of the consultation document and the statutory assessments were made

available for reference while leaflets, comment forms and FAQs were freely available for people to take away.

## **6 Duty to Cooperate and Joint Working**

- 6.1** Section 110 of the Localism Act 2011 inserted s33A into Part 2 of the Planning and Compulsory Purchase Act 2004 which introduced a new duty on Local Planning Authorities, County Councils and other bodies with statutory functions to cooperate with each other. The Council worked closely with neighbouring Local Planning Authorities and key service and infrastructure providers when preparing the evidence base and developing the Revised Preferred Options and will continue to do so in the future.
- 6.2** The Statement of Compliance with S.110 Localism Act 2011: 'Duty to Cooperate' Document sets out what the requirements are and provides a Duty to Cooperate register of work undertaken prior to the consultation. This register has been included in Appendix E of this report for completeness.
- 6.3** Officers attended the Essex Planning Officers Association (EPOA) – Planning Policy Forum meeting on 18<sup>th</sup> February 2014 and advised other LPAs in Essex of the Local Plan Revised Preferred Options consultation.
- 6.4** During the consultation the Council invited Essex Local Planning Authorities to attend a presentation on the Local Plan Core Strategy Revised Preferred Options and discuss strategic matters as part of the Duty to Cooperate. The meeting was held on Tuesday 4<sup>th</sup> March and officers from Brentwood Borough Council, Castle Point Borough Council, Chelmsford City Council, Epping Forest District Council, Essex County Council, Harlow, Thurrock Borough Council, and Uttlesford District Council attended.

## **7 How To Make Comments**

- 7.1** The 11 consultation questions were sited at the front of the Local Plan Core Strategy Revised Preferred Options Report immediately after the Foreword. They were numbered 1 to 11 and the order corresponded with how they were set out in the comments form. In the leaflet each question followed the summary section to which it related. For example, Question 4 - Do you agree with the approach for Wickford to grow? was on page 4 of the leaflet underneath the information on what was proposed for Wickford.
- 7.2** There were a number of ways that people could make comments and these were documented in the consultation material and notification letters. The adverts provided the link to the Basildon 2031 consultation webpage and/or the Planning Policy Team's contact details. Comments could be submitted in the following ways:
- Online
  - On paper
  - On email
- 7.3** Whilst only written representations could be legally accepted, the Council were available to answer questions on the consultation at public roadshows, over the telephone and in person at the Basildon Centre. The consultation aimed to be as inclusive as possible and reach a wide range of people and communities.

### Online

- 7.4 The Local Plan Core Strategy Revised Preferred Options Report and the supporting documents were available online on the Council's Basildon 2031 webpage. The comment form could be downloaded and returned to the Council. The Revised Preferred Options Report was also available on the Local Plan online consultation portal which could be accessed through the Council's website or through the web address provided on the consultation material. A consultee would have to be registered on the system before they were able to submit comments. Once logged in comments could be made by clicking on the questions at the start of the online document.

#### On paper

- 7.5 Comment forms were available at the five main local libraries, the permanent exhibition at the Basildon Centre, all the public roadshows, and from the Parish and Town Councils. Reference copies of the Local Plan Core Strategy Revised Preferred Options Report and free leaflets were also supplied at these locations and contained the questions. Copies of the comment form were also available on request. All comment forms had to be submitted to the Council.
- 7.6 Letters could also be submitted to the Council as part of the consultation.

#### On email

- 7.7 Comment forms could also be attached as an email or an email with comments could be submitted to the Council at [planningpolicy@basildon.gov.uk](mailto:planningpolicy@basildon.gov.uk).

## **8 Summary of Responses**

- 8.1 The consultation generated approximately 10,150 comments by nearly 2500 consultees. The eight roadshows held across the Borough were well attended with over 800 people dropping in to view the proposals and speak with Council officers. The advertising, briefing sessions and other public events held as part of the consultation also generated a high level of interest. The Basildon 2031 consultation webpage ([www.basildon.gov.uk/basildon2031](http://www.basildon.gov.uk/basildon2031)) was visited over 7,000 times during the consultation with the greatest number of views during March 2014. Internet users were directed to the consultation webpage from various sources including search engines, parish and town council websites, group and forums websites, local media websites and social media streams.
- 8.2 As part of the consultation, three petitions were submitted. In line with the Council's Petition Procedure it was determined that they should be considered through the consultation process of the Core Strategy Revised Preferred Options, rather than through the Overview and Scrutiny process. Following the Council's Petition Procedure, the Council determined that two of the petitions should be recorded as individual representations rather than as petitions. One of these petitions was received after the consultation deadline and therefore has been recorded as 'inadmissible'.

#### Inadmissible Representations

- 8.3 The Council, in line with legislation, 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, or parts of representations are 'inadmissible'; meaning they were either submitted late, didn't provide valid contact details or they contained inappropriate wording that the Council cannot take into account in preparing the Local Plan. There were 293 late comments and 24 without

contact details. There was also 8 representations received that had no contact name and therefore could not be registered. Further, there was a petition with 23 signatures, however as there was no lead petitioner; the Council were unable to consider the petition.

- 8.4** In addition, 51 of the representations were classed as inappropriate. Inappropriate representations were deemed inadmissible where they incited hatred or were discriminatory. The Council evaluated all representations to determine whether any were inadmissible against the Council's Equalities Evaluation Criteria, as shown in Appendix F. The Equalities Evaluation Criteria was prepared in accordance with the Equalities Act 2010 and the Human Rights Act 1998.
- 8.5** Late and inadmissible representations have not been included in the summary of main issues below or the issues set out in Appendix G and they will not be considered by the Council. For reference, inadmissible representations have been listed within Appendix G.
- 8.6** Appendix G of this report provides details of the representations under each of the 11 Revised Preferred Options consultation questions. Each question provides:
- A summary of the representation made;
  - A list of who made the representation;
  - The recommended Council response to the representation; and
  - Any specific actions that Council should take in light of the representation.

### The main issues

- 8.7** There were seven main areas that generated responses; these were:

1. Scale of Growth;
2. Distribution of Growth;
3. Loss of Green Belt;
4. Infrastructure;
5. Deliverability;
6. Lack of detail; and
7. The consultation process.

#### *1. Scale of Growth*

- 8.8** The public generally did not support the scale of growth proposed in the Local Plan Core Strategy Revised Preferred Options Report feeling that the South East of England was already too crowded. The statutory consultees generally supported the scale of growth recognising the need to provide for housing and employment, as well as protecting the Green Belt in the long term. Generally, developers and house builders commended the Council for supporting a reasonable level of growth, but some still feel that a higher amount of growth should be delivered.

#### *2. Distribution of Growth*

- 8.9** It was felt by the majority of Billericay and Wickford residents that Basildon (including Laindon and Pitsea) could accommodate more growth; and conversely the majority of Basildon residents felt that Billericay and Wickford could accommodate more growth. Developers and statutory consultees predominantly agreed with the distribution of growth between the three main settlements, but required further clarity on the term 'proportionate'.

### *3. Loss of Green Belt*

- 8.10** Most of the residents did not support the loss of Green Belt. Statutory bodies and developers agreed that the Council should accommodate growth needs that could not be accommodated in the urban areas by amending the Green Belt boundaries to provide for the Borough's needs and support its economic position in the Thames Gateway and Essex.

### *4. Infrastructure*

- 8.11** Most of the residents feel that there is insufficient infrastructure in the Borough at present and that this issue would be exacerbated by further development. Statutory bodies, infrastructure/ service providers and developers felt that the additional infrastructure set out in the Plan could be delivered but, that further work was required on the detail, funding and timing.

### *5. Deliverability*

- 8.12** There was concern that some of the Policy Areas for Development and Change (PADCs) could not be delivered as not all of the land was available for development. Further, it was felt that some PADCs would not be built-out within the timescales of the Council's proposed development phasing schedule that had been set out in the Revised Preferred Options Report – concluding that in the main, the Council was being too positive in the delivery rate of development per annum. A research paper was submitted by one consultee as part of their response to illustrate that an urban extension can take a minimum of eight years to start construction on site and due to the scale and size of some of the PADCs, some would be built-out after the plan period had passed. Consequently, the Borough would not be meeting its objectively assessed need within the plan period and this could affect the Local Plan's soundness. Taking this on board questions have been raised by some Consultees as to why some locations had been dismissed by the Council that are equally as suitable for development and could be delivered much sooner and enable the Council to meet its Local Planning Authority responsibilities.

### *6. Lack of detail*

- 8.13** A number of representations from the community, stakeholders and developers felt that there was limited information. It was mentioned by attendees at many of the roadshows and in the consultation comments that the details of the sites were unknown and therefore, it was difficult to make an effective and informed comment. It was stated by a few of the representations that it would be more effective and sound to identify the sites in the plan, so they could be allocated for development enabling the Council to demonstrate that the sites could be delivered and would meet the targets set out in the Plan.

### *7. The consultation process*

- 8.14** A lot of residents expressed concern that the comments they submitted would not be taken into account and the decisions had already been made. Many residents felt that they had not been adequately informed of the consultation process and only found out towards the end of the process, when they did not have enough time to review the Core Strategy Revised Preferred Options Report and its supporting documentation.

### Other Comments

- 8.15** A summary of the other comments made on the Local Plan Core Strategy Revised Preferred Options Report is set out in Appendix G of this report. With the exception of comments on the PADCs, which are explained further below, these representations largely

request clarification on areas of the Local Plan Core Strategy Revised Preferred Options Report, its supporting policies, or recommend wording/ phrasing changes.

#### Policy Areas for Development and Change

- 8.16** Specific comments (as supporting statements, observations or objections) were also made on the PADCs. In general, observations and objections fit into the seven categories above, however it should also be reported that there was broad support for PADCs in the Borough's town centres, the A127 Enterprise Corridor and South Essex Marshes.
- 8.17** In respects of the town centres many residents raised concerns as to whether the town centre proposals were deliverable given failed schemes and regeneration challenges experienced previously, or expressed dissatisfaction at recent planning application approvals for Basildon College, Basildon Market and the related scheme for new housing on fields to the south of Dry Street, which forms PADC4.
- 8.18** Finally, several other areas were suggested as being eligible for PADC status. These related to alternative Green Belt locations promoted for development by landowners/ developers.

## **9 The Next Steps**

- 9.1** Under Regulation 18(3) of the Town and Country Planning (Local Planning) (England) Regulations 2012, Basildon Borough Council, as the Local Planning Authority, must 'take into account' the representations made in response to the Local Plan Core Strategy Revised Preferred Options consultation. This will enable the Council to begin preparing the next stage of the Local Plan, informed from the results of the previous consultations. In addition, further evidence is being commissioned by the Council which will also inform how the plan will be taken forward.
- 9.2** The next stage of the Local Plan will also be subject to a public consultation. Anyone who has registered on the Local Plan consultation database will receive a notification of the consultation. This automatically includes everyone who has submitted comments on previous Local Plan consultations including this one.

## Appendix A – Consultation Adverts

Double page advertisement placed in the Yellow Advertiser

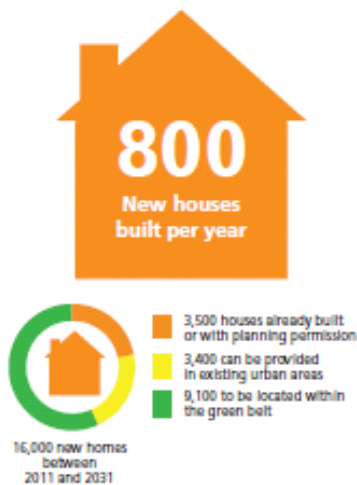
# Basildon 2031

## ...Have your say

Basildon Council are currently consulting on the Core Strategy which is the central document of the Borough's emerging Local Plan.

This vital plan sets out how much new housing needs to be built and how much land needs to be found for future employment use by 2031. Please read more about the proposals here and find out how you can have your say over the next eight weeks.

### Housing

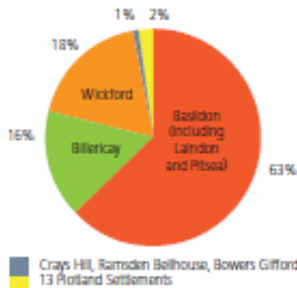


### Employment



The level of development will enable infrastructure improvements to:

- The Transport Network
- Education
- Healthcare
- Other Local Services
- Flood Management
- Utilities
- Telecommunications
- Open Spaces



### The Council's preferred option

National policy requires all local authorities to identify and plan for the future housing and employment needs in their area. They are based on future population projections, an analysis of the housing market, employment forecasts using employment and household figures, and the results of local business surveys.

There are three options for how this could be delivered. The Council's preferred option is for there to be a proportionate distribution of growth to the main towns of Basildon (including Laindon and Pitsea), Wickford and Billericay. This would see 10,125 homes in Basildon (including Laindon and Pitsea), 2,500 in Billericay and 2,800 in Wickford, with the remaining 575 split between Crays Hill, Ramsden Bellhouse, Bowers Gifford and plotlands settlements.

**Basildon Council**  
BASILDON • BILLERICAY • WICKFORD



The public consultation is running for a period of 8 weeks from Monday 20th January. All representations should be completed and received no later than 5pm on Tuesday 18th March.

## Where to view the Plan

The plan and its supporting documents can be viewed and downloaded online at [www.basildon.gov.uk/basildon2031](http://www.basildon.gov.uk/basildon2031). Reference copies of the plan and its supporting documents are available throughout the consultation period at the following libraries in the Borough:

- Basildon
- Billericay
- Laindon
- Pitsea
- Wickford

Copies of the plan can be ordered for a charge of £10 by contacting the Planning Policy Team.

## How to Comment

The Council would like your opinion on the plan. It has designed a set of 11 questions covering key aspects of the plan and its preparation to assist you in providing your comments.

The recommended method is to submit your comments securely online via the consultation portal at <http://basildon-consult.limehouse.co.uk/portal>

However, responses can also be made using the Comments Form which is available to download and print from the Council's website [www.basildon.gov.uk/basildon2031](http://www.basildon.gov.uk/basildon2031); can be picked up from the roadshow events, main libraries, and the Basildon Centre; or sent to you on request.

Completed Comments Forms and any other comments should be sent to:

**Planning Policy Team, Planning Services**  
Basildon Borough Council  
St Martin's Square  
Basildon  
Essex  
SS14 1DL

Or emailed to [planningpolicy@basildon.gov.uk](mailto:planningpolicy@basildon.gov.uk)

## Contact Details

If you have any queries or are unable to complete the questionnaire please contact the Planning Policy Team at [planningpolicy@basildon.gov.uk](mailto:planningpolicy@basildon.gov.uk) or telephone 01268 294868.

## Next Steps

All comments received during the consultation period will be taken into consideration when preparing the next stage of the Local Plan Core Strategy later in 2014.

## Roadshow Events

The Council will be hosting a series of staffed public roadshows across the Borough and welcomes anyone who wishes to find out more, or who has any questions, to come along and talk to Council staff.

These will run as follows:

### Billericay

Reading Rooms, 73 High Street, Billericay  
Thursday 6th February 1.30pm – 8pm  
Saturday 8th February 10am – 4pm

### Wickford

Bar Plazma, High Street  
Tuesday 11th February 1pm – 8pm  
Saturday 15th February 10am – 4pm

### Basildon

Eastgate Shopping Centre – (near Starbucks)  
Wednesday 19th February 10am – 5pm  
Saturday 22nd February 10am – 5pm

### Laindon

Laindon Community Centre  
Friday 28th February 1pm – 8pm

Throughout the consultation period there will also be a permanent exhibition in the Basildon Centre, St Martin's Square, Basildon which will provide information about the plan and the consultation.

*Creating Opportunity*

# ***Basildon 2031...Have your say***

**Basildon Council are currently consulting on the Core Strategy which is the central document of the Borough's emerging Local Plan.**

**This vital plan sets out how much new housing needs to be built and how much land needs to be found for future employment needs by 2031.**

The Council is encouraging everyone who is interested to make sure that they respond to the public consultation.

The plan and its supporting documents can be viewed and downloaded online at:

**[www.basildon.gov.uk/basildon2031](http://www.basildon.gov.uk/basildon2031)**

Throughout the consultation period there will also be a permanent exhibition in the Basildon Centre, St Martin's Square, Basildon and hard copies of the documents are available in the five main town centre libraries (Basildon, Billericay, Laindon, Pitsea & Wickford).

In the interest of ensuring that everyone has an opportunity to have their say, the public consultation has now been extended until **5pm on Tuesday 1st April 2014.**

For more information email: **[planningpolicy@basildon.gov.uk](mailto:planningpolicy@basildon.gov.uk)** or telephone **01268 294868.**

Photo 1: Bus Advertisement



Photo 2: Advertisement at Wickford Train Station





Photo 3: Trailer advertisement within Basildon town centre – Front



Photo 4: Trailer advertisement within Basildon town centre to notify the public of the consultation extension – Back



## Appendix B – List of Consultees

Under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the requirement to consult the public includes specific and general bodies, as well as consulting residents and businesses the Council considers appropriate.

### Specific (Statutory) Consultation Bodies

The specific consultation bodies which must be consulted with when preparing development plan documents are listed in the Town and Country Planning (Local Planning) (England) Regulations 2012 under Regulation 2 (1). The specific consultation bodies are:

- The Coal Authority
- The Environment Agency
- English Heritage
- The Marine Management Organisation
- Natural England
- Ministry of Defence
- Crown Estates Commission
- Health and Safety Commission
- Health and Safety Executive
- Sport England
- The Secretary of State for Transport (Department for Transport)
- A regional development agency whose area is in, or adjoins, the area of the Council (Previously EEDA)
- Network Rail Infrastructure Limited and Strategic Rail Authority
- The Highways Agency
- A relevant authority, any part of whose area is in or adjoins the area of the local council, such as:
  - A Council
    - Southend-on-Sea Borough Council
    - Chelmsford City Council
    - Brentwood Borough Council
    - Castle Point Borough Council
    - Rochford District Council
    - Thurrock Borough Council
    - Thames Gateway South Essex Group
  - A County Council
    - Essex County Council
  - A Parish Council
    - Billericay Town Council
    - Great Burstead and South Green Village Council
    - Little Burstead Parish Council
    - Noak Bridge Parish Council
    - North Benfleet and Bowers Gifford Parish Council
    - Ramsden Bellhouse Parish Council
    - Ramsden Crays Parish Council
    - Shotgate Parish Council
  - A Police Authority
    - Essex Police
- Any person to whom the electronic communications code applies by virtue of a direction given under Section 106 (3)(1) of the Communications Act 2003
  - Mobile Operators Association
- Any person who owns or controls electronic communications apparatus situated in any part of the area of the Council

- Mobile Operators Association
- Essex Fire and Rescue Service
- Essex Police
- East of England Ambulance Service NHS Trust
- The Homes and Communities Agency
- Any of the bodies from the following list who are exercising functions in any part of the area of the Council
  - a Primary Care Trust established under section 18 of the National Health Service Act 2006(9) or continued in existence by virtue of that section;
    - Basildon and Brentwood Clinical Commissioning Group
  - Person to whom a licence has been granted under Section 7(2) of the Gas Act 1986
    - National Grid Gas plc
  - Person to whom a licence has been granted under Section 6(1)(b) or (c) of the Electricity Act 1989
    - National Grid Electricity Transmission plc
    - UK Power Network
  - Sewage Undertaker
    - Anglian Water
  - Water Undertaker
    - Essex and Suffolk Water

### General Consultation Bodies

The general consultation bodies are listed under Regulation 2(1). The regulations identify five types of bodies as general consultation bodies that relate to voluntary organisations representing certain groups within the community. The general consultation bodies are:

- Voluntary bodies some or all of whose activities benefit any part of the council's area
- Bodies which represent the interests of:
  - Different racial, ethnic or national groups in the Local Planning Authority's area
  - Different religious groups in the Local Planning Authority's area
  - Disabled persons in the Local Planning Authority's area
  - Persons carrying on business in the Local Planning Authority's area.

When preparing Local Plan documents, the Council must consult those general consultation bodies it considers appropriate.

### Other Consultation Bodies

The key principle is that the Council carry out public consultation that is appropriate for the Local Plan document being produced. It may be appropriate to consult with other agencies and organisations in addition to those identified as specific or general consultation bodies.

## Appendix C – Consultation Letters / Emails

### First Consultation Letter

**'BASILDON 2031'**  
SHAPING THE FUTURE OF OUR BOROUGH

**Basildon Council**  
BASILDON • BILLERICAY • WICKFORD

Date 20<sup>th</sup> January 2014  
Please ask for Planning Policy  
Department Planning Services  
Tel. No 01268 294868  
E-Mail [planningpolicy@basildon.gov.uk](mailto:planningpolicy@basildon.gov.uk)  
Ref 2014/CRP0R/01

Dear ,

### **RE: CONSULTATION ON BASILDON BOROUGH LOCAL PLAN CORE STRATEGY REVISED PREFERRED OPTIONS REPORT**

I am writing to advise you that Basildon Borough Council is publishing its Local Plan Core Strategy Revised Preferred Options Report on 20 January 2014 for an eight-week public consultation. This letter provides further information on the Core Strategy, its consultation events and how you can have your say.

#### **What is the Core Strategy and why is important to let us know your views?**

The Core Strategy is the central document of the Borough's emerging Local Plan which establishes how much new housing and employment development needs to be built in the Borough by 2031 and where it could be built. It also proposes new core planning policies for managing future development.

It is important that you use this opportunity to have your say on the Local Plan Core Strategy Revised Preferred Options Report and its associated documents, to ensure your views are considered before the Council prepares its final version to submit to the Government later in 2014.

Other documents being published alongside the Core Strategy include:

- Its Evidence Base – research/ assessments/ studies looking at population growth, housing needs, infrastructure provision, etc.
- Sustainability Appraisal/ Strategic Environmental Assessment 2013
- Habitats Regulations Assessment 2013
- Service Impact Assessment 2013
- Spatial Options Topic Paper 2013

#### **Where can you see a copy of the Core Strategy and how can you comment?**

##### **Come and visit a Public Roadshow**

We are running eight public roadshows around the Borough between January 27<sup>th</sup> and 28<sup>th</sup> February 2014. Council Planning Officers will be on hand to help you understand the Core Strategy's proposals and answer your questions. There will also be information leaflets and comments forms for you to take away. All roadshows are the same and you can visit the one which is most convenient to you.

The roadshows details are:

Area	Date	Venue
Pitsea	Monday 27 <sup>th</sup> January 2014 1.00pm – 8.00pm	The Place: Pitsea Leisure Centre, Northlands Pavement, Pitsea
Billericay	Thursday 6 <sup>th</sup> February 2014 1.30pm – 8.00pm	Billericay Reading Rooms, 73 High Street, Billericay
	Saturday 8 <sup>th</sup> February 2014 10.00am – 4.00pm	

Area	Date	Venue
Wickford	Tuesday 11 <sup>th</sup> February 2014 1.00pm – 8.00pm	Bar Plazma, 54 High Street, Wickford
	Saturday 15 <sup>th</sup> February 2014 10.00am – 4.00pm	
Basildon	Wednesday 19 <sup>th</sup> February 2014 10.00am – 4.00pm	Outside Starbucks, Lower Mall, Eastgate Shopping Centre, Basildon
	Saturday 22 <sup>nd</sup> February 2014 10.00am – 5.00pm	
Laindon	Friday 28 <sup>th</sup> February 2014 1.00pm – 8.00pm	Laindon Community Centre, Aston Road, Laindon

### Read it and Comment Online

You can view and comment on the Core Strategy securely using the Council's online Consultation Portal accessed by typing the following URL into your Internet address bar: <http://basildon-consult.limehouse.co.uk/portal> and answering the questions posed.

If you do not know your username, or cannot remember if you have already registered with us, please contact the Planning Policy Team on 01268 294868 and we will check it for you. This helps us avoid duplicated records.

### Read it/ Download it from our Website

The Revised Preferred Options Report, its supporting documents and the Comments Form can also be viewed/downloaded as PDF files from our website [www.basildon.gov.uk/basildon2031](http://www.basildon.gov.uk/basildon2031).

### Read it at a Library/ Basildon Centre and Comment by Post/Email

The following documents will be available to view at Basildon, Billericay and Wickford libraries from 20<sup>th</sup> January 2014:

1. Core Strategy Revised Preferred Options Report 2013
2. Core Strategy Sustainability Appraisal/ Strategic Environmental Assessment 2013
3. Core Strategy Habitats Regulations Assessment 2013
4. Core Strategy Service Impact Assessment 2013
5. Core Strategy - Spatial Options Topic Paper 2013
6. Core Strategy - Comments Forms
7. Core Strategy - Summary Leaflets
8. Documents which make up the Council's evidence base such as population assessments, housing studies, infrastructure assessments, etc.

All other libraries in the Borough, only reference copies of (1) to (5) above will be available. The Comments Forms and Summary Leaflets can be taken away.

Reference copies of (1) to (5) and (8) will be available to view on request from Customer Services at the Basildon Centre, St Martin's Square, Basildon throughout the consultation period. The Comments Forms and Summary Leaflets can be taken away.

### Comment by Post/ Email

Completed Comments Forms should be returned to the following address:

Planning Policy Team, Planning Services, Basildon Borough Council, St Martin's Square, Basildon, Essex, SS14 1DL

You can also write us a letter with your comments on, but please let us know which question(s) or section(s) of the Core Strategy you are responding about, so we can process your response accurately.

Any email responses should be sent to: [planningpolicy@basildon.gov.uk](mailto:planningpolicy@basildon.gov.uk).

### Hard Copies of the Core Strategy and Comments Forms

Hard copies of the Core Strategy are available to purchase for £10.00 each. Cheques should be made payable to Basildon Borough Council or arrangements to pay by debit/credit card payments can be made by calling the Planning Technical Support Team on 01268 294948. Please remember to tell us your contact details when making a payment so we can send your documents to you swiftly.



Comments Forms are free of charge. If you cannot visit a library, cannot print a Comments Form from our website or need multiple copies of the Comments Form, we can post these to you on request.

Finally, I would like to thank you for your continued interest in the Basildon Borough Local Plan and if you have any questions or need further information, please do not hesitate to get in touch with the Planning Policy Team by phone or email as above.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. Winslow', with a long horizontal flourish extending to the right.

Matthew Winslow  
Planning Policy Manager

Date	12 <sup>th</sup> March 2014
Please ask for	Planning Policy
Department	Planning Services
Tel. No	01268 294868
E-Mail	planningpolicy@basildon.gov.uk
Ref	2014/CSRPOR/06

Dear,

**Re: EXTENSION TO the consultation on Basildon Borough Local Plan Core Strategy Revised Preferred Options Report**

I am writing to advise you that Basildon Borough Council has decided to extend the consultation period for its Basildon Borough Local Plan Core Strategy Revised Preferred Options Report from 5pm 18 March 2014 to **5pm 1 April 2014**. There will therefore now be an additional two weeks to take part in the consultation and submit your views.

If you, or your organisation have already made comments and wish to use this additional time to add further comments you can do so by following the same commenting procedures below. If you have any questions regarding this please the extension please direct them to the Planning Policy Team 01268 294868/[planningpolicy@basildon.gov.uk](mailto:planningpolicy@basildon.gov.uk)

The remainder of this letter now provides a reminder on how you can access the Local Plan Core Strategy and have your say:

**Read it/ Download it from our Website**

The Revised Preferred Options Report, its supporting documents and the Comments Form can be viewed/downloaded as PDF files from our website [www.basildon.gov.uk/basildon2031](http://www.basildon.gov.uk/basildon2031).

**Read it at a Library/ Basildon Centre and Comment by Post/Email**

The following documents have been available to view at Basildon, Billericay and Wickford libraries since 20<sup>th</sup> January 2014:

1. Core Strategy Revised Preferred Options Report 2013
2. Core Strategy Sustainability Appraisal/ Strategic Environmental Assessment 2013
3. Core Strategy Habitats Regulations Assessment 2013
4. Core Strategy Service Impact Assessment 2013
5. Core Strategy - Spatial Options Topic Paper 2013
6. Core Strategy - Comments Forms
7. Core Strategy - Summary Leaflets
8. Documents which make up the Council's evidence base such as population assessments, housing studies, infrastructure assessments, etc.

All other libraries in the Borough, only reference copies of (1) to (5) above are available. The Comments Forms and Summary Leaflets can also be taken away.

Reference copies of (1) to (5) and (8) will be available to view on request from Customer Services at the Basildon Centre, St Martin's Square, Basildon throughout the consultation period. The Comments Forms and Summary Leaflets can be taken away.

## **Comment by Post/ Email**

Completed Comments Forms should be returned to the following address:

Planning Policy Team, Planning Services, Basildon Borough Council, St Martin's Square, Basildon, Essex, SS14 1DL

You can also just write us a letter with your comments on, but please let us know which question(s) or section(s) of the Core Strategy you are responding about, so we can process your response accurately.

Any email responses should be sent to: [planningpolicy@basildon.gov.uk](mailto:planningpolicy@basildon.gov.uk).

## **Hard Copies of the Core Strategy and Comments Forms**

Hard copies of the Core Strategy are still available to purchase for £10.00 each. Cheques should be made payable to Basildon Borough Council or arrangements to pay by debit/credit card payments can be made by calling the Planning Technical Support Team on 01268 294948. Please remember to tell us your contact details when making a payment so we can send your documents to you swiftly.

Comments Forms are free of charge. If you cannot visit a library, cannot print a Comments Form from our website or need multiple copies of the Comments Form, we can post these to you on request.

Finally, I would like to thank you for your continued interest in the Basildon Borough Local Plan and if you have any questions or need further information, please do not hesitate to get in touch with the Planning Policy Team by phone or email as above.

Yours sincerely,



Matthew Winslow  
Planning Policy Manager

2<sup>nd</sup> January 2014

Dear resident,

**The Local Plan Core Strategy – having a say over the future of our borough**

You may have heard recently about the council's plans for the future growth of the borough, and how we are putting a strategy in place to ensure that we control this growth. Doing this will ensure that the development that occurs creates opportunity for local people and is in all of our best interests.

We wanted to tell you more about the plans and how you can get involved through a public consultation starting the week commencing 20 January. Councils have a legal duty to put together local plans. Our 'Local Plan Core Strategy' as it is known, sets out a framework for future development and growth up to 2031.

Having a realistic and credible plan is absolutely vital if we are to retain the maximum amount of control over the development of our borough over the next 20 years. If we do not have a robust plan in place we will leave ourselves vulnerable to piecemeal development that will not deliver the schools, health facilities and improved transport networks that we will need to support that growth. In short, without a core strategy we will see far more building that is unplanned, uncoordinated, and unacceptable, and not in keeping with our local towns and villages.

We must also be honest with you. Any plan for future growth will involve greenbelt land being built on. But we will not be concreting over the borough – 63% of our borough is currently greenbelt and even if all of the development set out in the plan were to take place over the next 20 years, almost 59% of our borough will still be greenbelt. We will still be a very green borough, but one that has been developed in a controlled and sensitive manner in the interest of local people.

Like all other areas, we must accommodate new homes over the next 20 years. We cannot ignore the figures that independent assessments tell us we need, but we can have a very big say in how and where new development happens. Our local plan enables us to do this – not having one would see us lose control over the borough's future.

Our research tells us that we must find land for 16,000 new homes between 2011 and 2031. Nearly 3,500 have already been built or have planning permission, so 12,500 new homes still need to be planned for. There is a limited amount of urban land available so approximately 9,100 of these new homes will need to be built on land that is currently designated as green belt. Almost 120 acres of land will also be used for new employment development creating an estimated 8,500 new jobs for our borough. We will also need to provide for 106 new traveller pitches over the next 20 years to allow for the natural growth of the borough's traveller population. This figure is also based on an independent assessment of the needs of this community.

There are three options on how all of this could happen. Our preferred option is that growth is accommodated proportionately between the main towns of Basildon (including Laindon and Pitsea), Billericay and Wickford. This option is what we will be asking for your views on during the public consultation which will begin the week commencing 20 January.

Our overarching priority is to create opportunity for local people, their children and grandchildren.

We need growth and development in our borough to do this. We will need new houses for local people, their children and grandchildren to live in and we will need to make way for new commercial development in order to provide more jobs.

This is one of the most important plans the council will put in place, and it will determine our future growth and opportunities for our residents for the next 20 years, so it is vital that you have your say.

Please visit [www.basildon.gov.uk](http://www.basildon.gov.uk) from the week commencing 20 January, or alternatively, visit one of the roadshows that are running throughout the borough. Planning officers will be available at all of the roadshows to answer questions from members of the public. For more information on the Local Plan Core Strategy please call Planning Services on 01268 294868 or email [ldf@basildon.gov.uk](mailto:ldf@basildon.gov.uk).

Residents are welcome to attend any of the following roadshows and have their say:

**Pitsea – The Place, Northlands Pavement**

Monday 27<sup>th</sup> January 1pm – 8pm

**Billericay - Reading Rooms, 73 High Street, Billericay**

Thursday 6<sup>th</sup> February 1.30pm – 8pm

Saturday 8<sup>th</sup> February 10am – 4pm

**Wickford - Bar Plazma, High Street**

Tuesday 11<sup>th</sup> February 1pm – 8pm

Saturday 15<sup>th</sup> February 10am – 4pm

**Basildon - Eastgate Shopping Centre – (near Starbucks)**

Wednesday 19<sup>th</sup> February 10am – 5pm

Saturday 22<sup>nd</sup> February 10am – 5pm

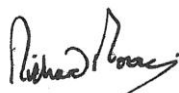
**Laindon - Laindon Community Centre**

Friday 28<sup>th</sup> February 1pm – 8pm

Yours sincerely,



Cllr Tony Ball, leader of the council



Cllr Richard Moore, cabinet member for planning

## Appendix D – Posters and Leaflet

Original A3 & A4 Poster

# 'BASILDON 2031'

Basildon Borough Council is drawing up a Local Plan to guide the development of the Borough for the next 20 years. It is vital that local people have their say on how the Borough should develop.

### THE BIG ISSUES ARE:

- Balance between Green Belt and development
- Economic growth and employment
- Town Centre Regeneration

Consultation runs from:

**JANUARY 20<sup>th</sup> - MARCH 18<sup>th</sup> 2014**

Come along to our roadshows:

### PITSEA

Monday 27 January

The Place, Pitsea Leisure Centre 1pm – 8pm

### BILLERICAY

Thursday 6 February

Billericay Reading Rooms 1.30pm – 8pm

Saturday 8 February

Billericay Reading Rooms 10am – 4pm

### WICKFORD

Tuesday 11 February

Bar Plazma, High Street 1pm – 8pm

Saturday 15 February

Bar Plazma, High Street 10am – 4pm

### BASILDON

Wednesday 19 February

Outside Starbucks, Eastgate Shopping Centre 10am – 5pm

Saturday 22 February

Outside Starbucks, Eastgate Shopping Centre 10am – 5pm

### LAINDON

Friday 28 February

Laindon Community Centre 1pm – 8pm

**Have  
Your  
Say!**

For details and how to get involved visit [www.basildon.gov.uk/basildon2031](http://www.basildon.gov.uk/basildon2031), email [planningpolicy@basildon.gov.uk](mailto:planningpolicy@basildon.gov.uk) or call us on 01268 294868

**BasildonCouncil**  
BASILDON • BILLERICAY • WICKFORD

# 'BASILDON 2031'

Basildon Borough Council is drawing up a Local Plan to guide the development of the Borough for the next 20 years. It is vital that local people have their say on how the Borough should develop.

**Consultation has been extended  
by two weeks and will now close  
at 5pm on Tuesday 1<sup>st</sup> April 2014**

**Have  
Your  
Say!**

The big issues for the Borough are:

- Balance between Green Belt and development
- Economic growth and employment
- Town Centre Regeneration

For more details of the Local Plan and how to get involved please visit [www.basildon.gov.uk/basildon2031](http://www.basildon.gov.uk/basildon2031).

Alternatively, contact the Planning Policy Team by email [planningpolicy@basildon.gov.uk](mailto:planningpolicy@basildon.gov.uk) or call us on 01268 294868.



# Basildon 2031....Have your say

We are currently consulting on the Core Strategy which is the central document of the Borough's emerging Local Plan. This vital plan sets out how much new housing needs to be built and how much land needs to be found for future employment needs by 2031. Please read more about the proposals in this leaflet and find out how you can have your say.

## I Development Need

### Housing



- 3,500 houses already built or with planning permission
- 3,400 can be provided in existing urban areas
- 9,100 to be located with the green belt



### Employment



- 1 ha of employment land already delivered
- 37 ha can be provided within existing urban areas
- 11 ha to be located with the green belt



The level of development will enable infrastructure improvements to:

- The transport network / Education / Healthcare / Other local services
- Flood management / Utilities / Telecommunications / Open spaces

## Q.1

The Council's Development Need is set out above. Do you agree?

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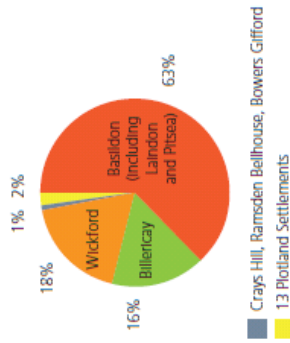
## 2 Options for delivering the new homes and employment growth

National policy requires all local authorities to identify and plan for the future housing and employment needs in their area. They are based on future population projections, an analysis of the housing market area needs, employment forecasts using employment and household data, and the results of local business surveys.

### Spatial Option 2A: Proportionate Distribution to the Main Towns

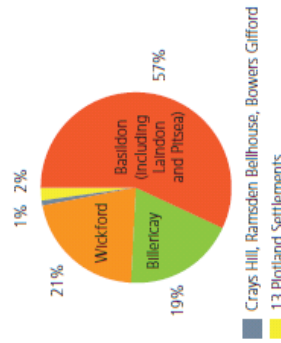
This option proposes a proportionate distribution of growth between Basildon (including Laindon and Pitsea), Billericay and Wickford based on existing settlement populations with the remainder of growth split between the serviced settlements of Crays Hill, Ramsden Bellhouse, Bowers Gifford and the Plotland areas.

**This is the Council's preferred option**



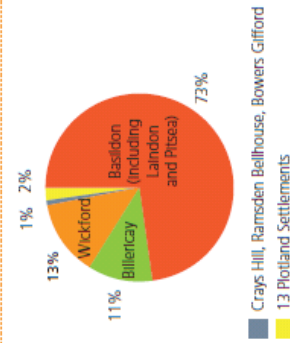
### Spatial Option 2B: Growth focused on Billericay and Wickford

This option focuses development in Billericay and Wickford with a smaller proportion of growth directed to Basildon (including Laindon and Pitsea). The remainder of growth would be split between the serviced settlements of Crays Hill, Ramsden Bellhouse, Bowers Gifford and the Plotland areas.



### Spatial Option 2C: Growth focused on Basildon

This option focuses development in Basildon (including Laindon and Pitsea) with a smaller proportion of growth directed to Billericay and Wickford. The remainder of growth would be split between the serviced settlements of Crays Hill, Ramsden Bellhouse, Bowers Gifford and the Plotland areas.



## Q.2

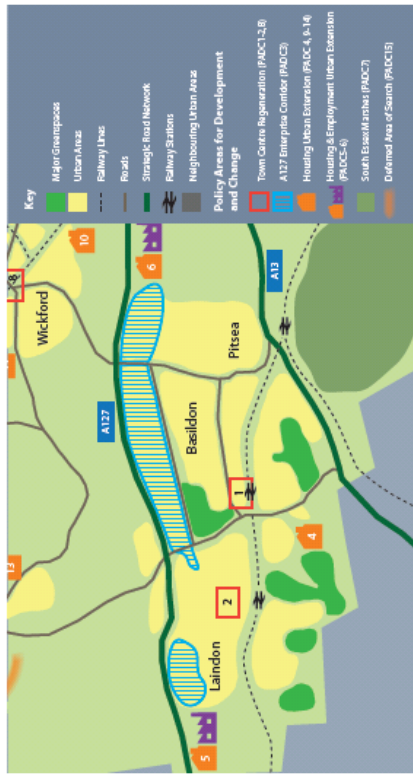
The Council will deliver the Development Need through Option 2A (proportionately to each settlement). Do you agree?



### 3 In Option 2A this is how Basildon will grow

Basildon will be expected to deliver a total of 10,125 new homes and 48 hectares of employment land across the plan period, of which nearly 2,500 homes and 0.7 hectares of employment land have already been built or granted planning permission.

Just over 5,000 homes and 11 hectares of employment land will be allocated within the Green Belt in three urban extensions around Basildon. The remaining need will be delivered within the existing urban area.



- Basildon Town Centre (1)**  
Regeneration of the town centre will provide 2,000 new homes, new retail, leisure and office floorspace, a further education college, highways improvements, and enhancements to the public realm
- Laindon Town Centre (2)**  
Regeneration of the town centre will provide at least 150 new homes, new retail floorspace, new car parking and public realm improvements
- A127 Enterprise Corridor (3)**  
Employment area providing 23 hectares of new B-class employment land and a mixed use development west of Gardiners Lane South

(7) The South Essex Marshes which are also within the Green Belt have been identified as being environmentally significant and will be protected and enhanced over the plan period.

- The Nethemayne Urban Extension (4)**  
725 new homes, new local centre and a new primary school
- The West Basildon Urban Extension (5)**  
Mixed use development providing 2,300 new homes, 5.5 hectares of new employment land and a new primary school
- The North East Basildon Urban Extension (6)**  
Mixed use development providing 2,000 new homes, 5.5 hectares of employment land, new primary and secondary schools and a new primary healthcare facility

Q.3 Do you agree with the approach for Basildon to grow?

### 4 In Option 2A this is how Wickford will grow

Wickford will be expected to deliver a total of 2,800 new homes and less than 1 hectare of employment land across the plan period, of which around 800 new homes have already been built or granted planning permission.

250 homes and the required land for employment can be delivered within the existing urban settlement of Wickford. Around 1,750 homes will need to be allocated in the Green Belt and four separate urban extensions have been proposed.



- Wickford Town Centre (8)**  
Regeneration of Wickford town centre will provide new retail floorspace for food and comparison goods, a new high street market, a new gym and refurbished swimming pool, new car parking, and improvements to the public realm
- The North East Wickford Urban Extension (9)**  
At least 150 new homes and investment in a strategic multi-functional landscape corridor along the A130 corridor

- The South Wickford Urban Extension (10)**  
At least 760 new homes, a new local centre, and investment in a strategic multi-functional landscape corridor along the A130 corridor
- The West Wickford Urban Extension (11)**  
At least 220 new homes and a local centre
- The North West Wickford Urban Extension (12)**  
At least 620 new homes and contributions to upgrade of Wickford Health Centre

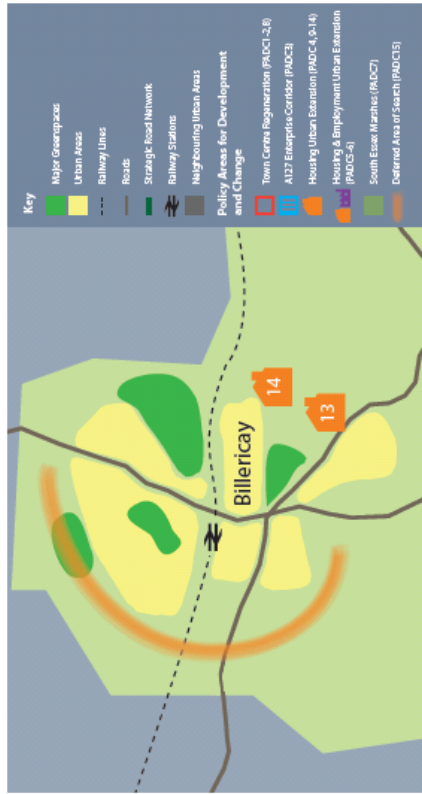
Q.4 Do you agree with the approach for Wickford to grow?

## 5

### In Option 2A this is how Billericay will grow

Billericay will be expected to deliver a total of 2,500 new homes and less than 1 hectare of employment land across the plan period, of which around 200 new homes have already been built or granted planning permission.

The land required for employment can be delivered within the existing urban area, however around 2,100 new homes will need to be allocated in the Green Belt surrounding Billericay. Two urban extensions have been proposed to the south and south east of the settlement along with an area of search for further suitable urban extensions to the west.



**The South East Billericay Urban Extension (13)**  
At least 180 new homes and investment in community infrastructure

**The East Billericay Urban Extension (14)**  
At least 430 new homes and a new local centre

**The Billericay West Deferred Area of Search (15)**  
At least 1,400 new homes alongside new infrastructure and local services, subject to highway mitigation testing

### In Option 2A, this is how Crays Hill, Ramsden Bellhouse, Bowers Gifford and the Plotland areas will grow

200 new homes will be distributed between Crays Hill, Ramsden Bellhouse and Bowers Gifford and a further 375 will be delivered within the 13 Plotland areas as infill development up to 2031.






**Q.5** Do you agree with the approach for Billericay to grow?

**Q.6** Do you agree with the approach for Crays Hill, Ramsden Bellhouse, Bowers Gifford and the Plotland areas to grow?

## 6

### Core Policies

There are 20 Core Policies within the Core Strategy which outline the key principles for future development within the Borough. They cover a broad range of themes including housing, employment, the local environment, health and well being, and transport and infrastructure.

 <p><b>Affordable Housing</b> 36% of new homes built between 2011 and 2031 within the Borough should be affordable.</p>	 <p><b>Gypsy, Traveller and Travelling Showpeople</b> A total of 121 pitches will need to be provided over the plan period. This is equivalent to 6 new pitches each year.</p>	 <p><b>Green Belt</b> Inappropriate development within the Green Belt will not be permitted.</p>
 <p><b>The Environment</b> New development should conserve and enhance the Borough's natural and historic environment, and protect the local distinctiveness and identity of the built environment. Energy efficiency will be maximised through sustainable construction and the promotion of renewable energy schemes. Flood risk will be managed and new development will be directed to areas of lowest flood risk first.</p>	 <p><b>Infrastructure Provision</b> New development will be required to provide appropriate infrastructure such as schools and healthcare, and help to deliver enhancements to local services and the transport network.</p>	

**Q.7** Do you agree with the Council's Core Policies?

**Q.8** Do you have any other comments?

## 7 Technical Questions

These are technical questions about the process of producing the Local Plan Core Strategy. Please answer if you would like to.

**Q.9**

Do you have any comments on the evidence base?

**Q.10**

Do you have any comments on Service Impact Assessment, Sustainability Appraisal / Strategic Environmental Assessment, and Habitat Regulations Assessment?

**Q.11**

Do you have any comments on monitoring, delivery and phasing?

## 8 Consultation

### Consultation Dates

The consultation will run for a period of 8 weeks, from **Monday 20th January 2014** to **Tuesday 18th March 2014**. All representations should be completed and received no later than 5pm on the final day of the consultation.

### Where to view the Plan

The plan and its supporting documents can be viewed and downloaded online at [www.basildon.gov.uk/basildon2031](http://www.basildon.gov.uk/basildon2031)

Reference copies of the plan and its supporting documents are available throughout the consultation period at the following libraries in the Borough:

- Basildon
- Laindon
- Pitsea
- Wickford
- Billericay

Copies of the plan can be ordered for a charge of £10 by contacting the Planning Policy Team.

### Roadshow Events

The Council will be hosting a series of staffed public roadshows across the Borough and welcomes anyone who wishes to find out more, or who has questions, to come along and talk to Council staff. Further information of these events can be found on the Council's website.

Throughout the consultation period there will also be a permanent exhibition in the Basildon Centre, St Martin's Square, Basildon which will provide information about the plan and the consultation.

### How to Comment

The Council would like your opinion on the plan. It has designed a set of 11 questions covering key aspects of the plan and its preparation to assist you in providing your comments.

The recommended method is to submit your comments securely online via the consultation portal at <http://basildon-consult.limehouse.co.uk/portal>

However, responses can also be made using the Comments Form which is available to download and print from the Council's website [www.basildon.gov.uk/basildon2031](http://www.basildon.gov.uk/basildon2031) picked up from the roadshow events, main libraries, and the Basildon Centre; or sent to you on request.

Completed Comments Forms and any other comments should be sent to:

**Planning Policy Team**  
Planning Services  
Basildon Borough Council  
St Martin's Square  
Basildon  
Essex  
SS14 1DL

Or emailed to [planningpolicy@basildon.gov.uk](mailto:planningpolicy@basildon.gov.uk)

### Contact Details

If you have any queries or are unable to complete the questionnaire please contact the Planning Policy Team at [planningpolicy@basildon.gov.uk](mailto:planningpolicy@basildon.gov.uk) or telephone **01268 294868**.

### Next Steps

All comments received during the consultation period will be taken into consideration when preparing the next stage of the Local Plan Core Strategy later in 2014.

Copies of the leaflet can be made available in audio, large print or Braille on request by contacting the Planning Policy Team on 01268 294868

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## Appendix E – Register of the Duty to Cooperate

Date	Subject	Relevant Strategic Matters	Who was engaged?	What form did the engagement take?	Were any agreements/decisions reached with Section 33A parties?	Notes
19.1.12	Essex and Southend on Sea Waste Development Document	Waste	Basildon BC by ECC	Written submission to public consultation	None	CMDR – 18.2.12
16.2.12	Draft Basildon Town Centre Masterplan Interim SPD	<p>Future retail and leisure floorspace proposals for a Regional Town Centre serving a planning area greater than Borough boundary</p> <p>Impacts on Basildon Railway Station</p> <p>Impacts on highway network</p>	All statutory consultees, the general public, special interest groups and those on the Local Plan contact database.	Letters, website, social media, focus groups, meetings and roadshows.	Comments received from the Environment Agency, Natural England, Essex County Council, Primary Care Trust and Homes and Communities Agency.	<p>Cabinet and Council approved consultation document.</p> <p>Changes to Masterplan needed in light of comments.</p> <p>Comments will go back to Cabinet for formal consideration.</p>
27.2.12	Basildon Borough Core Strategy Preferred Options Development Plan Document	<p>Housing and employment growth targets and development locations</p> <p>Impacts on transport network</p>	All statutory consultees, the general public, special interest groups and those on the Local Plan contact database.	Letters, website, social media, focus groups, meetings and roadshows.	Cabinet endorsed a number of changes to Core Strategy needed in light of representation on 8 <sup>th</sup> November 2012.	<p>Cabinet and Council approved consultation document.</p> <p>Changes to Core Strategy needed</p>



Date	Subject	Relevant Strategic Matters	Who was engaged?	What form did the engagement take?	Were any agreements/decisions reached with Section 33A parties?	Notes
						in light of comments.  Comments will go back to Cabinet for formal consideration.
28.3.12	Castle Point New Local Plan Issues Paper	Cross boundary implications	Basildon Borough Council by CPBC	Letter containing response to public consultation	No	
8.6.12	Thurrock Borough Site Specific Allocations and Policies Development Plan Document	Cross boundary implications of site allocations in south east of Borough.	Basildon Borough Council by TBC	Written submission to public consultation	CMDR authorised formal response of Local Planning Authority	CMDR – 8.6.12
12.7.12	TGSE Planning and Transport Board	Cross boundary implications	Basildon, Castle Point, Rochford (Apologies), Thurrock, Essex Councils; TGSEP; London Southend Airport, DfT, Highways Agency and Theo Steele	Board Meeting	Decision made that group would become proactive mechanism for the delivery of the duty to cooperate across South Essex. Terms of Reference amended.	
19.7.12	Castle Point Draft Residential Guidance SPD	Cross boundary implications	Basildon Borough Council by CPBC	Online Objective Consultation	Formally responded online that the Council had no comments to	

Date	Subject	Relevant Strategic Matters	Who was engaged?	What form did the engagement take?	Were any agreements/decisions reached with Section 33A parties?	Notes
	Consultation				make on this occasion.	
3.8.12	Response to Chelmsford City Review of Statement of Community Involvement	Cross boundary implications	BBC by CCC	Email invite and online response	None. BBC made a minor procedural observation.	Cllr Moore agreed that nature of response did not need a CMDR
3.8.12	Response to Chelmsford City Focused Review of Core Strategy and Development Management Policies DPD	Cross boundary implications	BBC by CCC	Email invite and online response	None. BBC made some minor observations.	Cllr Moore agreed that nature of response did not need a CMDR
3.8.12	Response to Chelmsford City's Little Baddow Village Design Statement	Cross boundary implications	BBC by CCC	Email invite and online response	None. BBC had no comments to make.	Cllr Moore agreed that nature of response did not need a CMDR
30.10.12	TGSE Planning and Transport Board		Basildon, Castle Point, Rochford, Thurrock, Essex Councils; TGSEP.	Board Meeting	Draft TGSE Planning and Transport Strategy presented for comment.  Proposal by Basildon, Castle Point and Rochford to prepare joint A130 Strategic Corridor Strategy with Chelmsford City and Essex County	

Date	Subject	Relevant Strategic Matters	Who was engaged?	What form did the engagement take?	Were any agreements/decisions reached with Section 33A parties?	Notes
					Council noted.	
25.01.13	Rochford District Allocations DPD Submission Document	Cross boundary implications and Gypsy and Traveller provision.	BBC by RDC	Written invitation and written representation.	BBC welcomed RDC proactive steps to make land available for future Gypsy and Traveller Needs and employment development.  BBC objected to location to of Gypsy and Traveller site as not being the most suitable considering alternatives.	CMDR – 5.2.13  Follow up meeting between RDC and BBC officers held in April 2013 ahead of Allocations DPD Examination in Public.
12.02.13	Essex Minerals Plan Pre-Submission Draft	Minerals Planning	BBC by ECC	Email invite and online response	None. BBC had no comments to make.	Cllr Moore agreed that nature of response did not need a CMDR
06.03.13	Thurrock Borough Core Strategy Focussed Review and Site Specific Allocations.	Cross boundary issues and Lakeside/West Thurrock Basin regeneration.	BBC by TBC	Written response	BBC agrees to work with TBC to investigate and address strategic and cross boundary matters in relation to the Core Strategy Focused Review and Site Specific Allocations.	CMDR 06.03.13
12.07.13	Lower Thames Crossing Options Consultation	Positioning of new Lower Thames Crossing and changes to Strategic Road Network	BBC by Department for Transport	Public Exhibition in Basildon Centre;	No. BBC issued support for Option C variant.	CMDR 12.07.13

Date	Subject	Relevant Strategic Matters	Who was engaged?	What form did the engagement take?	Were any agreements/decisions reached with Section 33A parties?	Notes
29.7.13	Basildon Core Strategy Revised Preferred Options/ Infrastructure Delivery Plan	Compilation of Infrastructure Baseline and development of Spatial Options	Environment Agency, Basildon and Brentwood Clinical Commission Group and Infrastructure Providers (See Appendix 2) by BBC	Letter to infrastructure providers by post or e-mail	Further collaboration to be carried out during consultation on Basildon Core Strategy Revised Preferred Options	Infrastructure providers asked to respond by 31 August 2013. Purpose was to gather information on infrastructure requirements in relation to potential broad areas of growth in the Borough up to 2031.
12.9.13	Basildon Core Strategy Revised Preferred Options/ Infrastructure Delivery Plan	Compilation of Infrastructure Baseline and development of Spatial Options	Anglian Water Services Ltd by BBC	Meeting at Basildon Borough Council Offices	Further collaboration to be carried out during consultation on Basildon Core Strategy Revised Preferred Options	Further collaboration to be carried out through public consultation and direct engagement
18.9.13	Basildon Core Strategy Revised Preferred Options Infrastructure Delivery Plan/Essex Thameside Rail Franchise	Compilation of Infrastructure Baseline and development of Spatial Options and Essex Thameside Rail Franchise Priorities	First Group PLC by BBC	Meeting at Basildon Borough Council Offices	Further collaboration to be carried out during consultation on Basildon Core Strategy Revised Preferred Options	Further collaboration to be carried out through public consultation and direct engagement



Date	Subject	Relevant Strategic Matters	Who was engaged?	What form did the engagement take?	Were any agreements/decisions reached with Section 33A parties?	Notes
19.11.13	Meeting Basildon Core Strategy Revised Preferred Options/ Infrastructure Baseline Assessment.	In-patient capacity	Basildon Hospital NHS Foundation Trust by BBC	Meeting at Basildon Borough Council Offices	Further collaboration to be carried out during consultation on Basildon Core Strategy Revised Preferred Options	
19.12.13	Southend Airport Controlled Airspace Application	Cross boundary issues in relation to airspace regulated by CAA	Basildon BC was engaged by London Southend Airport Ltd in line with CAA procedures.	Letter	Basildon Borough Council issued a letter of "No Objection" to the proposed changes to Controlled Airspace.	Cllr Moore agreed that nature of response did not need a CMDR

## Appendix F – Equalities Evaluation Criteria

	Criteria	Description	Example	Council Response
<b>Criteria 1:</b>	Expressing or Inciting Hatred	Someone with intent to act or incite others based on overt discrimination or hatred.	<p>“I do not want Travellers here, the community should get together and force them out”</p> <p>Use of overtly offensive terms such as paki, nigger, pikey or stereotypes applied to particular groups that incite hatred.</p>	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.
<b>Criteria 2:</b>	Discriminatory Opinion	An opinion which singles out a particular group of people with no logical explanation. This would include stereotyping	<p>“No land in Laindon should be provided for Travellers”</p> <p>“Lots and lots of students hanging around creating the potential nuisance and the potential to change the atmosphere of the Town for the worse”</p>	These comments should not be taken into account. However the Council should state in the final report that we do not tolerate any form of discrimination and any comments that were discriminatory have not been included in the report or any decision-making process
<b>Criteria 3:</b>	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	<p>“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”</p> <p>“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”</p>	Valid response should be included as part of the consultation