Basildon Borough Local Plan 2023-2043

Consultation Statement 2024

Volume 2: Reg 18.1 & Reg 18.2

Part B – pages 212-407



Basildon Council

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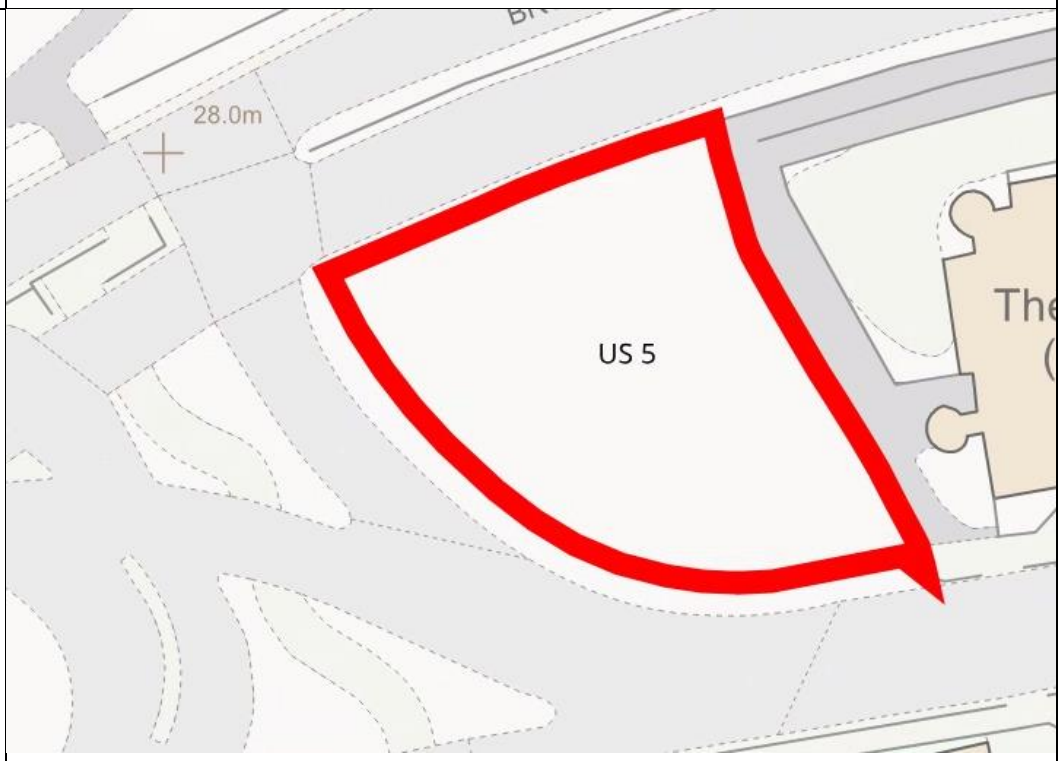
Appendix

Essex County Council Response to Reg 18 Draft Local Plan Consultation Part 1 and Part 2

Urban Capacity Sites

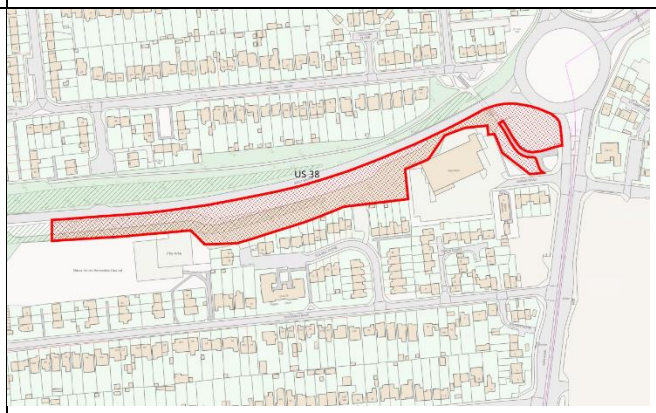
We asked:
What is your view on delivering housing on these sites. Please select a specific site and leave a comment.

The main issues raised on the following urban capacity sites were:

Reference Number	US 5
Map	
Summary	No Comments
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	US 32
Map	

Summary	No Comments
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.
Reference Number	US 36
Map	
Summary	2 satisfied comments: Housing need is paramount. 1 negative comment: Concern for loss of local green space
Actions	We will consider if it will be appropriate to designate this as local green space

Reference Number	US 38
Map	
Summary	1 satisfied comment: Housing need is paramount. 1 negative comment: Access will limit potential capacity
Actions	We will consider if it will be appropriate to designate this for housing.

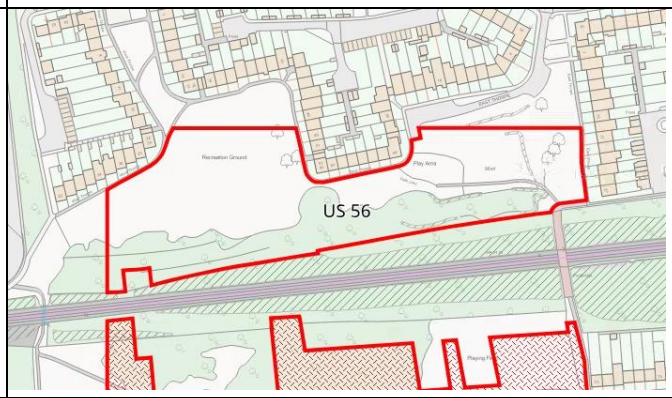
Reference Number	US 44

Map	
Summary	No Comments
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	US 45
Map	
Summary	1 positive comment: The site is suitable for a mixed-use development
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

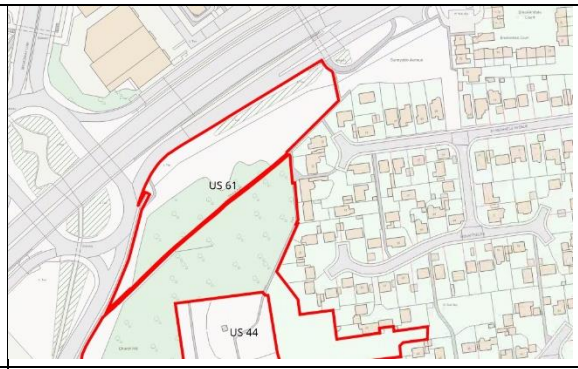
Reference Number	US 48
Map	

Summary	1 positive comment: 1 negative comment: Concern about risk of flooding from new development
Actions	We will consider if it will be appropriate to designate this as for housing.

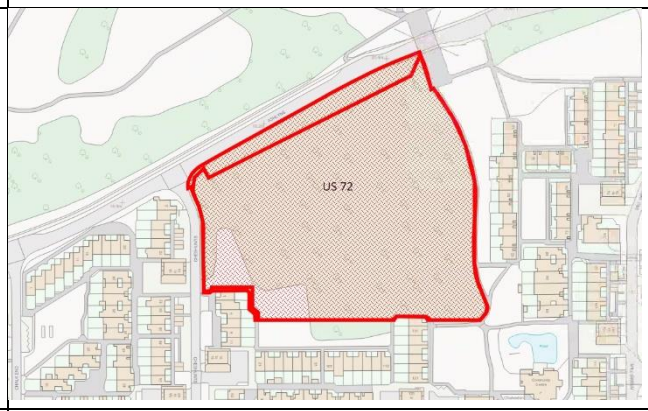
Reference Number	US 56
Map	
Summary	No Comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	US 57
Map	
Summary	No Comments
Actions	N/A

Reference Number	US 61

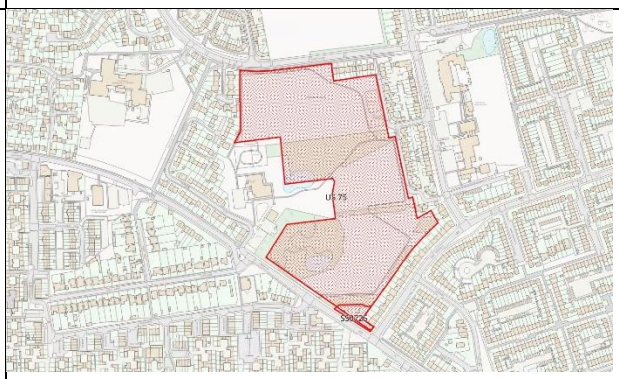
Map	
Summary	No Comments
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	US 65
Map	
Summary	No Comments
Actions	The Council will prepare an undated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	US 72
Map	
Summary	1 positive comment. 1 negative comment: Concerns surrounding suitable transport infrastructure.

Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	US 74
Map	
Summary	3 positive comments. 18 negative comments: Concerns surrounding suitable transport infrastructure; Concern of development impacts on biodiversity and habitats; Concern around the sufficient provision of infrastructure; Preserve/protect the green spaces; Concern about pollution.
Actions	We will consider the ongoing evidence base to if these concerns can be overcome.

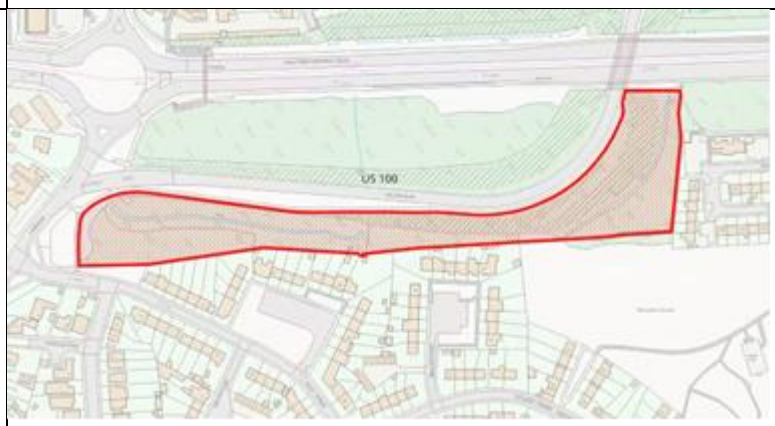
Reference Number	US 75
Map	
Summary	2 positive comments. 2 negative comments: Concerns surrounding suitable transport infrastructure; Concern of development impacts on biodiversity and habitats; Preserve/protect the open spaces; Concerns for wellbeing if local green spaces are lost
Actions	We will consider the ongoing evidence base to if these concerns can be overcome.
Reference Number	US 79

Map	
Summary	No comments
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	US 82
Map	
Summary	2 negative comments: Concerns surrounding suitable transport infrastructure; Concern of development impacts on biodiversity and habitats; Preserve/protect the open spaces; Concerns for wellbeing if local green spaces are lost.
Actions	We will consider if it will be appropriate to designate this as local green space.

Reference Number	US 91

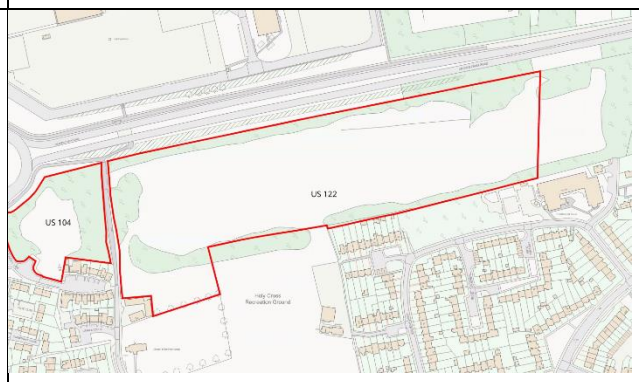
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	US 100
Map	
Summary	1 positive comment: Housing need is paramount.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	US 104
Map	

Summary	1 positive comment: Housing need is paramount.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	US 110
Map	
Summary	No comments
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

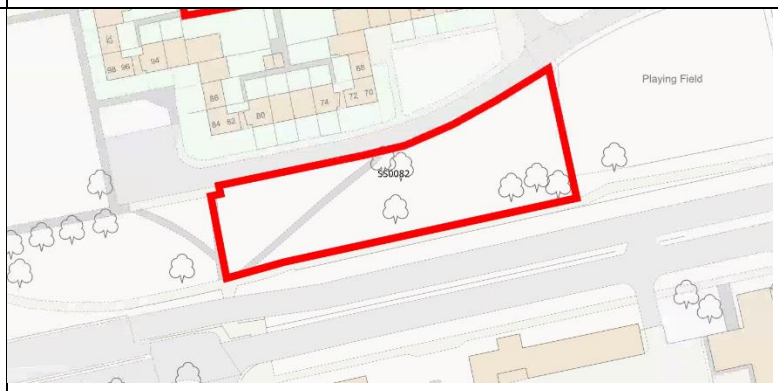
Reference Number	US 122
Map	
Summary	2 negative comments: Concerns surrounding suitable transport infrastructure; Concern of development impacts on biodiversity and habitats; Preserve/protect the open spaces; Concerns for wellbeing if local green spaces are lost.
Actions	We will consider if it will be appropriate to designate this as local green space.

Reference	SS0034

Number	
Map	
Summary	6 negative comments: Concerns surrounding suitable transport infrastructure; Concerns surrounding the loss of parking; Land could be used for public realm improvements rather than housing.
Actions	We will consider the ongoing evidence base to if these concerns can be overcome.
Reference Number	SS0073
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0077

Map	
Summary	1 positive comment: Housing need is paramount.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

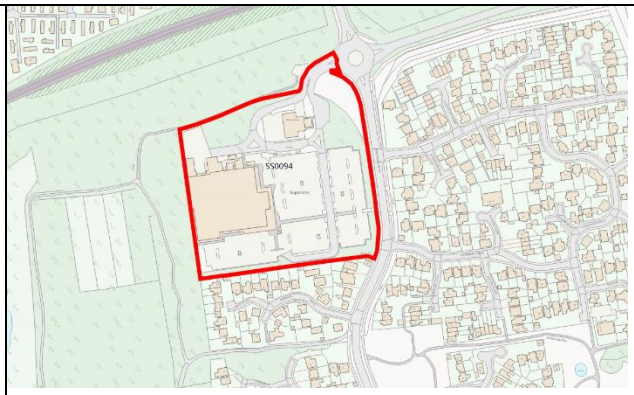
Reference Number	SS0082
Map	
Summary	No comments
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0089

Map	
Summary	No comments
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0090
Map	
Summary	No comments
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

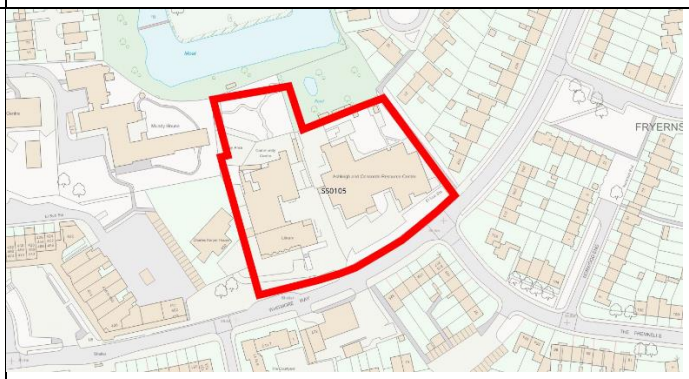
Reference Number	SS0094

Map	
Summary	4 negative comments: Concerns surrounding suitable transport infrastructure; Concerns surrounding the loss of services
Actions	We will consider the ongoing evidence base to if these concerns can be overcome.

Reference Number	SS0101
Map	
Summary	4 negative comments: Concerns surrounding suitable transport infrastructure; Concerns surrounding the loss of services.
Actions	We will consider the ongoing evidence base to if these concerns can be overcome.

Reference Number	SS0103

Map	
Summary	No Comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0105
Map	
Summary	4 negative comments: Concerns surrounding suitable transport infrastructure; Concerns surrounding the loss of community facilities.
Actions	We will consider the ongoing evidence base to if these concerns can be overcome.

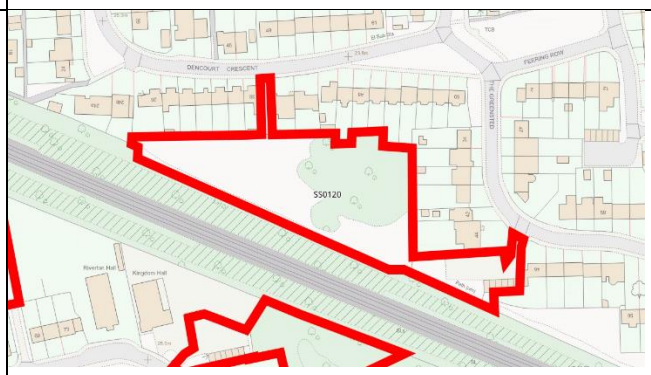
Reference Number	SS0113

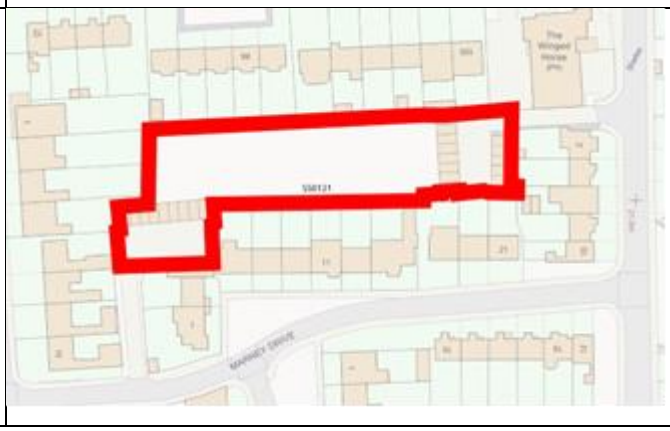
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0117
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

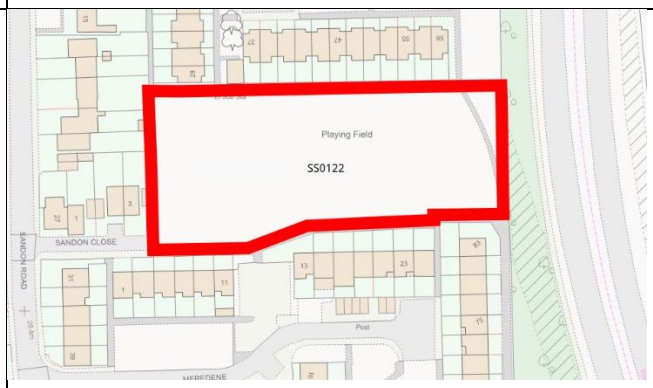
Reference Number	SS0118

Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0120
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0121
Map	

Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

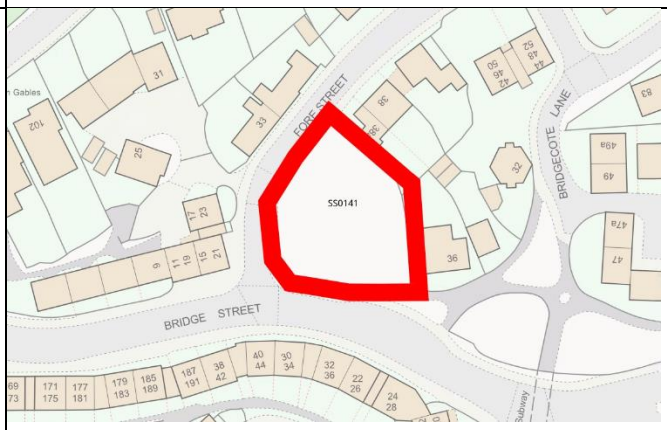
Reference Number	SS0122
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment. N/A

Reference Number	SS0123
Map	

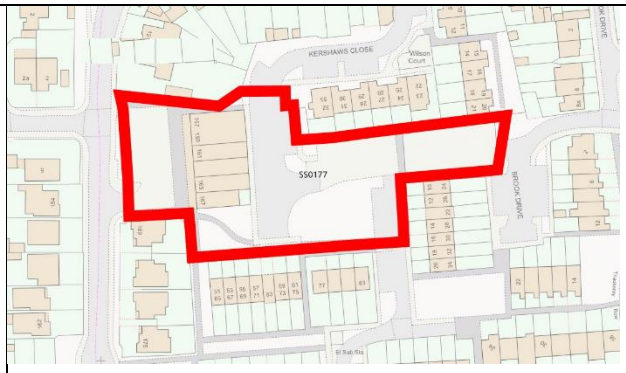
Summary	1 positive comment: Existing housing stock needs improvement; Concern around the sufficient provision of infrastructure.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0139
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0140
Map	
Summary	12 negative comments: Concerns surrounding suitable transport infrastructure; Concern of development impacts on biodiversity and habitats; Concern around the sufficient provision of infrastructure; Preserve/protect the green spaces; Concerns for wellbeing if local green spaces are lost; Concern on the impact of development on the character of the area.
Actions	We will consider the ongoing evidence base to if these concerns can be overcome.

Reference Number	SS0141
Map	
Summary	14 negative comments: Concerns surrounding suitable transport infrastructure; Concern of development impacts on biodiversity and habitats; Concern around the sufficient provision of infrastructure; Preserve/protect the green spaces; Concerns for wellbeing if local green spaces are lost; Concern on the impact of development on the character of the area.
Actions	We will consider the ongoing evidence base to if these concerns can be overcome.

Reference Number	SS0176
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.
Reference Number	SS0177

Map	
Summary	11 negative comments: Concerns surrounding suitable transport infrastructure; Concern on the impact of development on the character of the area; Concerns surrounding the loss of services.
Actions	We will consider the ongoing evidence base to if these concerns can be overcome.

Reference Number	SS0178
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

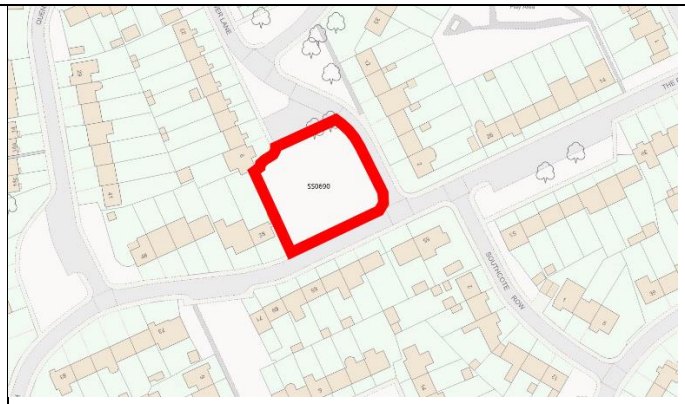
Reference Number	SS0646
Map	
Summary	No comments.

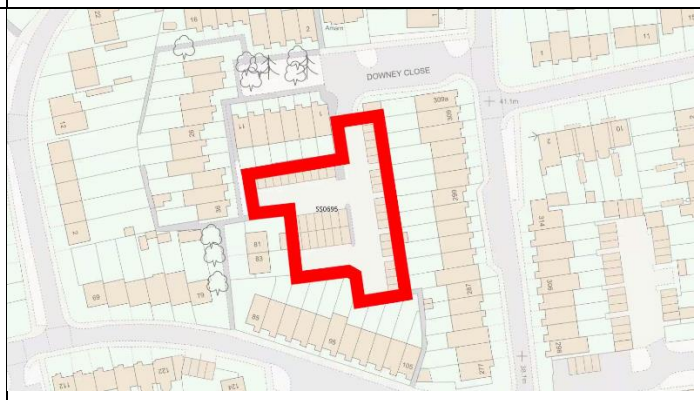
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0684
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0689
Map	
Summary	1 negative comment: Concern about the loss of a religious facility.
Actions	We will consider the ongoing evidence base to if these concerns can be overcome.

Reference Number	SS0690

Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0695
Map	
Summary	1 negative comment: Existing housing stock needs improvement; Concern around the sufficient provision of infrastructure.
Actions	We will consider the ongoing evidence base to if these concerns can be overcome.

Reference Number	SS0696
Map	

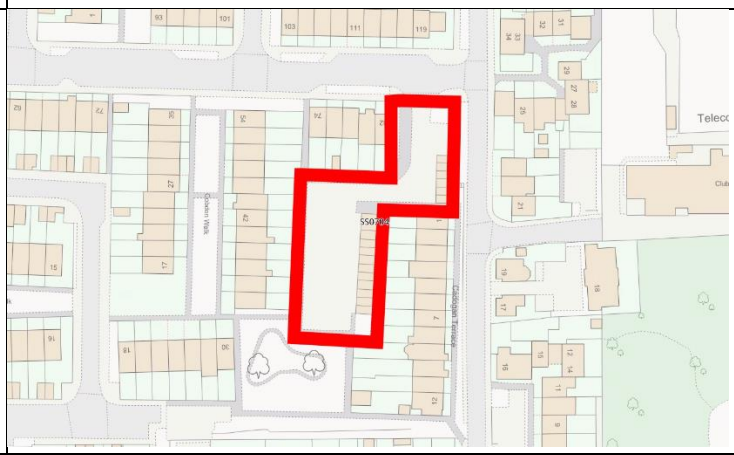
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0697
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0698
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

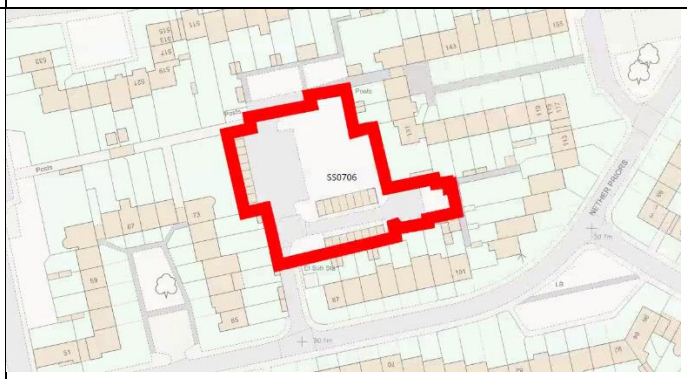
Reference Number	SS0703

Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0704
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0705
Map	
Summary	No comments.

Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0706
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0707
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0724
Map	

Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

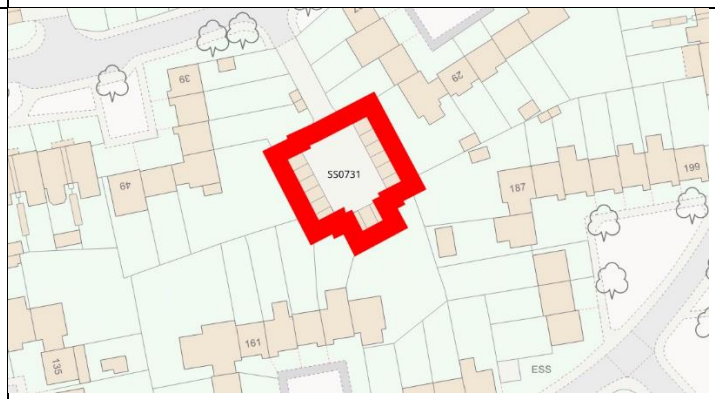
Reference Number	SS0725
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0727
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0729

Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0730
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0731
Map	
Summary	No comments.

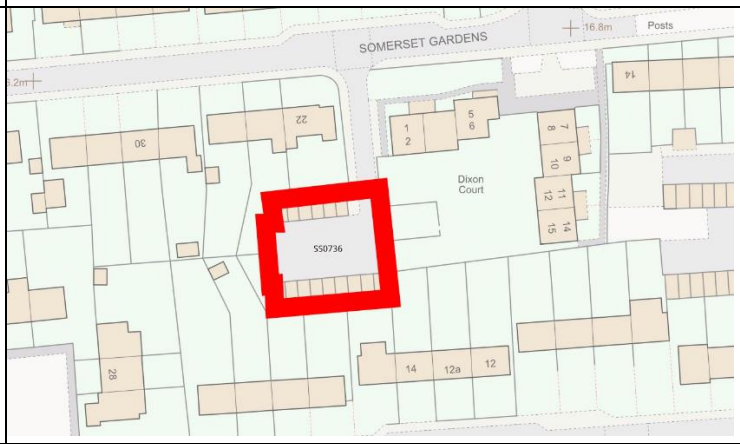
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0733
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0734
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

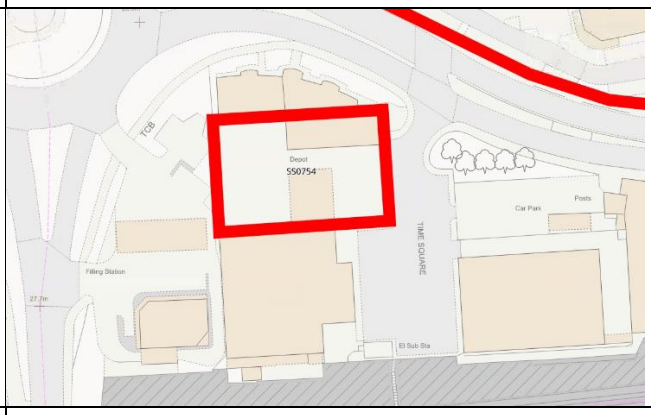
Reference Number	SS0735

Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0736
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

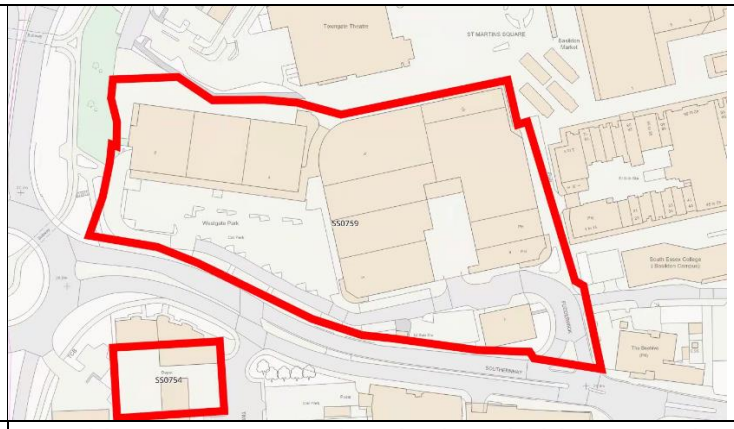
Reference Number	SS0738
Map	
Summary	1 positive comment: higher density development would be suitable.

Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0754
Map	
Summary	1 positive comment: area is suitable for residential development.
Actions	We will review this in conjunction with the emerging Basildon Town Centre Masterplan.

Reference Number	SS0755
Map	
Summary	2 positive comments: The site is suitable for a mixed-use development.
Actions	We will review this in conjunction with the emerging Basildon Town Centre Masterplan.

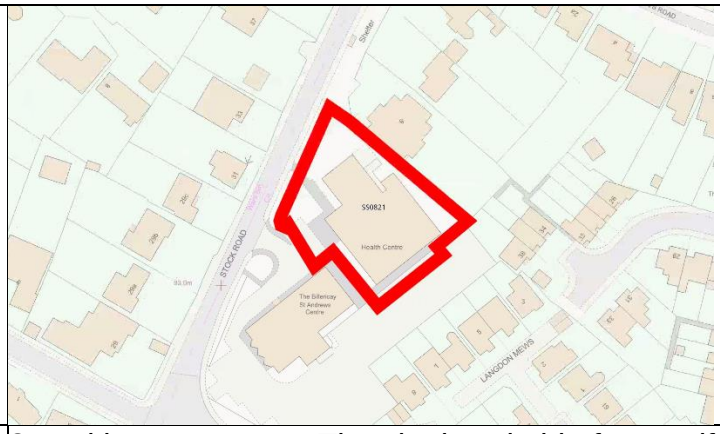
Reference Number	SS0759

Map	
Summary	5 positive comments: The site is suitable for a mixed-use development.
Actions	We will review this in conjunction with the emerging Basildon Town Centre Masterplan.

Reference Number	SS0788
Map	
Summary	No comments.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0796
Map	
Summary	2 positive comments: The site is suitable for a self-build opportunity. 1 negative comment: Concerns surrounding suitable transport infrastructure.
Actions	The Council will prepare an updated infrastructure delivery plan and carry out a whole plan viability assessment.

Reference Number	SS0821

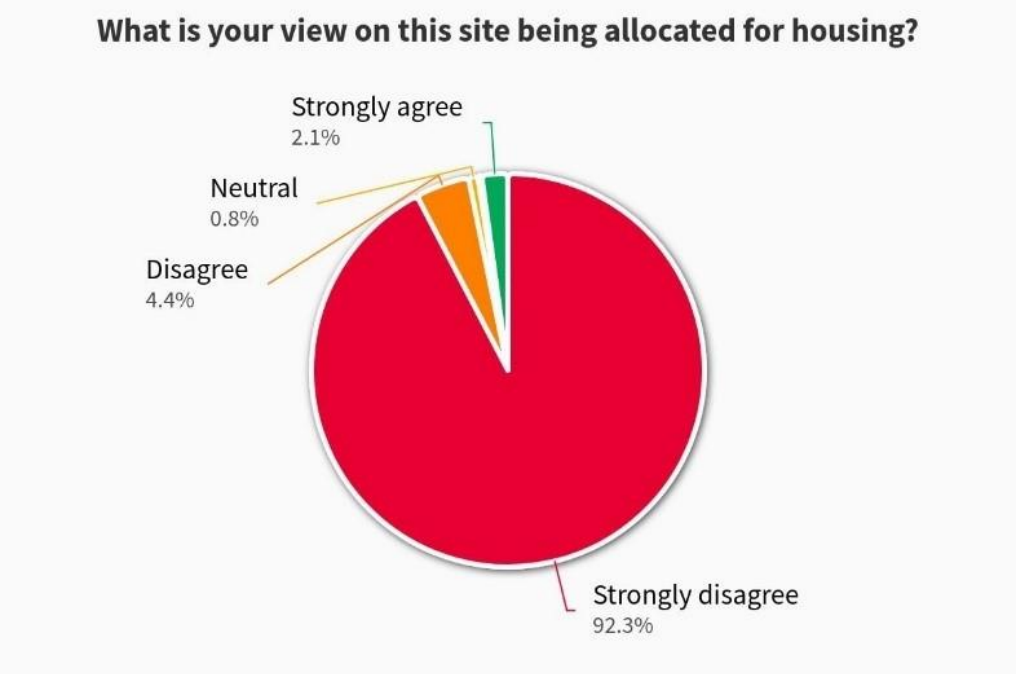
Map	
Summary	2 positive comments: The site is suitable for a self-build opportunity. 19 negative comments: Concerns surrounding suitable transport infrastructure; Concern around the sufficient provision of infrastructure; Concern about the loss of a medical facility
Actions	This site will only become available if the community/medical facility is no longer required in accordance with the Healthy Communities chapter.

Reference Number	SS0822
Map	
Summary	1 negative comment: Concern about the loss of a medical facility.
Actions	This site will only become available if the community/medical facility is no longer required in accordance with the Healthy Communities chapter.

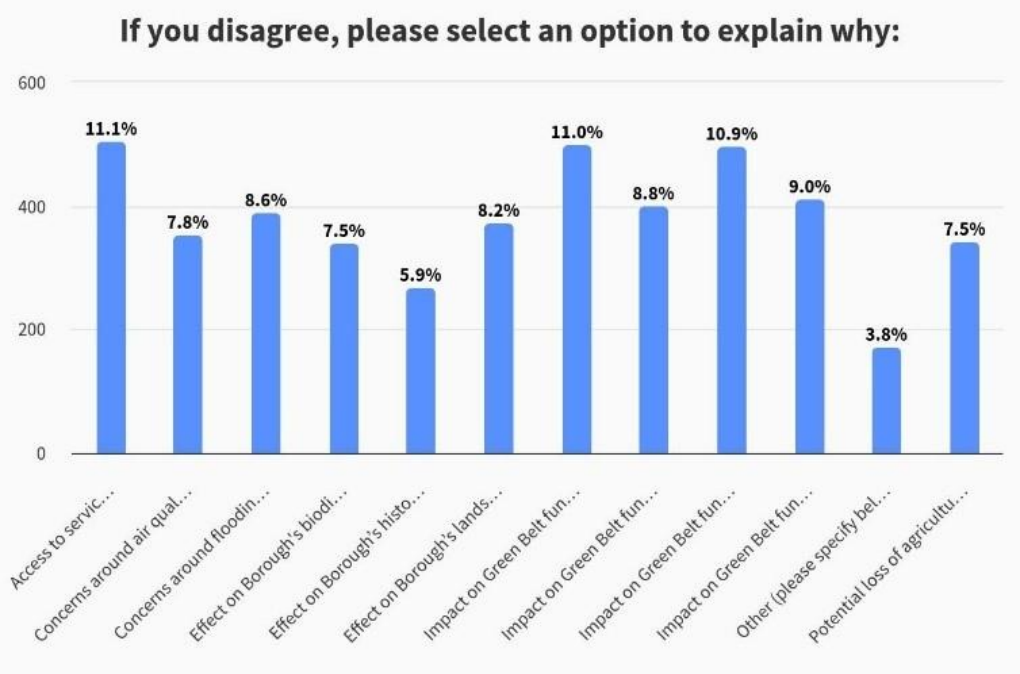
Site Allocations

H1 – Southeast Billericay

We asked:



We asked:



We asked:
Please give reasons for your view.

The main comments raised were:

Main comments	Basildon Council's response
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern around the impact on conservation areas / heritage assets.	The historic environment and potential impacts that development could have will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Concern around the impact on wildlife and/or the natural environment.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Loss of agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern about access to the proposed site.	Access to any site allocations will be reviewed as part of the site refinement exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very
Concern about urban sprawl.	
Concern around encroachment	

Main comments	Basildon Council's response
	special circumstances does not need to be demonstrated.
Highlights risk of flooding.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Concern around the impact on open spaces and sport and recreation.	Policy relating to open space and sports/recreation facilities are covered under the Regulation 18-part 2 consultation.
Concern about air pollution from traffic.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Concern around sufficient provision of employment opportunities.	Chapter 5 Building a Strong Competitive Economy deals with employment matters.
Supportive of the need for an up-to-date Local Plan.	Support noted.
Objection to Standard Method of calculating housing need.	Basildon Council has considered this, and it would not be appropriate because it contradicts national policy and evidence. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. Failure to do so would result in the plan being found unsound at examination with resultant reputational and financial risks to the Council.
The need to reduce demand/Limit development.	
Deliver more affordable housing.	Basildon Council notes these comments; we consider that affordable housing provision is reflected in Policy HOU2 Affordable Housing.
Objects to proposed allocation.	Objection noted.
Unclear comment.	N/A to consultation.
Preserve rural villages.	The Local Plan contains policies on design and preserving character. It also identifies strategic sites where housing growth will take place.

Main comments	Basildon Council's response
Concern about impact on existing habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Ensure existing biodiversity value on sites is correctly assessed.	Noted, this will be required at planning application stage.
Essex Badger Protection group have provided guidance for mitigating impacts on sites where badger sets may exist.	Information noted.
Concern about the impacts of development and loss of green spaces on health and wellbeing.	Policy relating to sport and community facilities is covered under the Regulation 18-part 2 consultation.
Outside scope of Local Plan (property price).	N/A to consultation.
Support Billericay Town Council Response.	Support noted
Support for new settlements such as new towns or garden villages.	Support noted.
Does not support level of proposed growth in Billericay.	Objection noted.
The need to improve consultation practice.	Basildon Council notes these comments; we consider that they are reflected in the Statement of Community Involvement (SCI) which formalises proposals for consulting the public on planning matters and builds on the wider Planning Services' standard consultation practices.
Concern around the Green Belt Study and classification of grey belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Deliver housing on brownfield sites.	
Deliver housing on grey belt sites.	
Promote renewable energy on new builds.	The policies within the climate change chapter have been included to support the

Main comments	Basildon Council's response
	drive towards net zero development.
Development would have an impact on climate change.	
Ensure adequate Care Home Provision.	Policy HOU3: Specialist Housing for Older People outline the calculated need for specialist housing for older people.
Promotes Infill development.	Comment noted.
Objection to the scale of growth proposed.	Objection noted.
Improve public transport and active travel options	An updated Local Walking and Cycling Infrastructure Plan is being prepared. This will set out priorities for new and improved walking and cycling routes.
Site promotion.	Support noted.
Suggest revision to include new allocation at Foots Farm	All strategic sites are undergoing further refinement following the Regulation 18 consultation and will be updated as further evidence base work is undertaken.
Supports this as a sustainable location for growth with existing infrastructure.	Support noted.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

- Basildon
- Brownfield sites.
- Industrial areas
- Off A127
- Bring back empty homes to provide supply
- New Town
- Vange
- Crays Hill
- Strategic allocation AS2, AS3
- Employment areas
- Grey belt sites
- Steeple View Dunton Road
- Wickford
- Stock
- Wat Tyler
- Bowers Gifford
- Midlands
- North England
- Middlesbrough
- Laindon
- London
- Pitsea
- Billericay Station

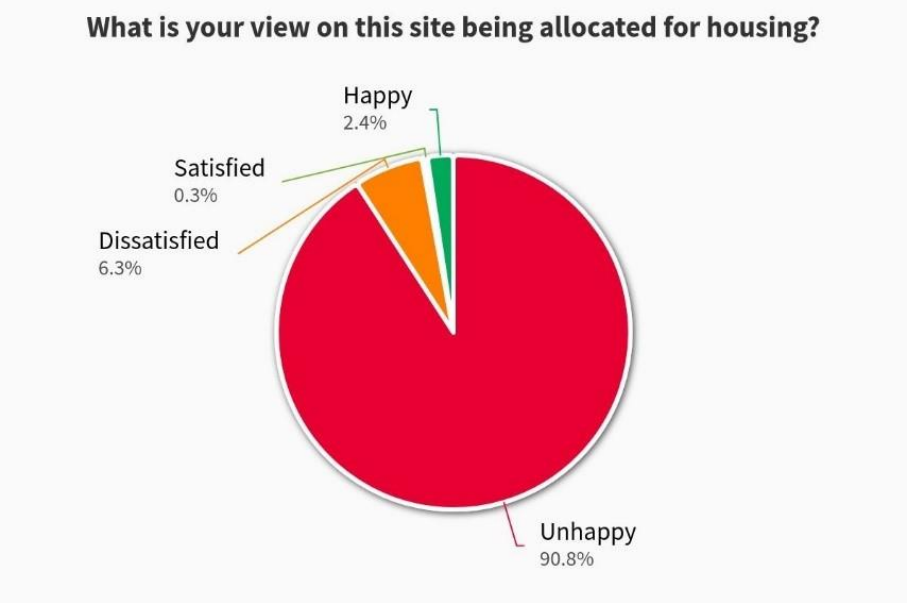
- Between the A128 and Lower Dunton Road
- Stockport
- Ockendon
- Shenfield
- Brentwood

Actions and next steps

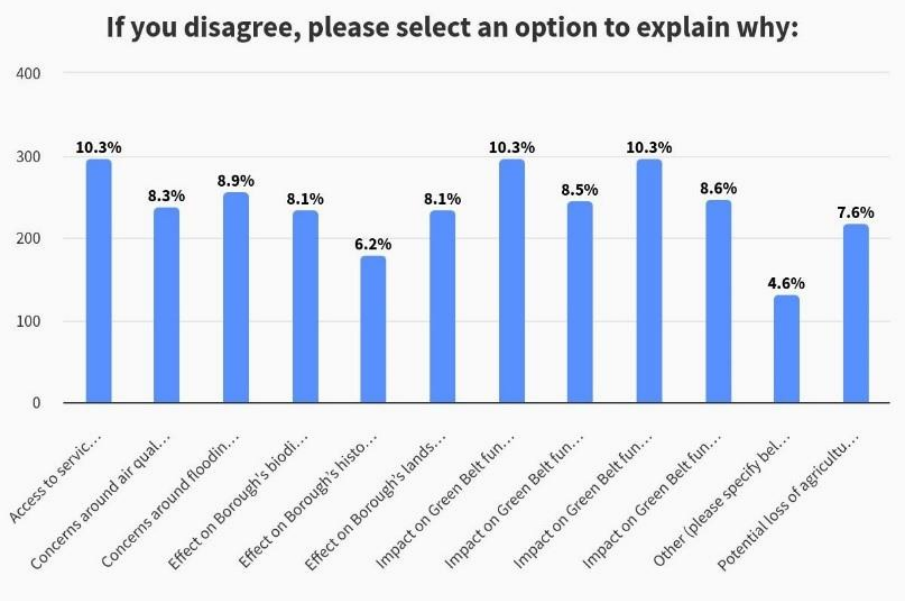
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H2 – Land West of Great Burstead

We asked:



We asked:



We asked:
Please give reasons for your view.

The main comments raised were:

Main comments	Basildon Council's response
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Loss of agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern around encroachment.	
Concern about urban sprawl.	
Concern around the impact on conservation areas / heritage assets.	The historic environment and potential impacts that development could have will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Objection to Standard Method of calculating housing need/	Basildon Council has considered this, and it would not be appropriate because it contradicts national policy and evidence. To determine the minimum number of

Main comments	Basildon Council's response
	homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. Failure to do so would result in the plan being found unsound at examination with resultant reputational and financial risks to the Council.
Concern around the impact on wildlife and/or the natural environment.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern about impact on existing habitats.	
Highlights risk of flooding.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Concern about air pollution from traffic.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Concern land under multiple ownerships.	All strategic sites are undergoing further refinement following the Regulation 18 consultation and will be updated as further evidence base work is undertaken.
Objects to proposed allocation.	Objection noted.
The need to improve consultation practice, drawing upon local knowledge.	Basildon Council notes these comments; we consider that they are reflected in the Statement of Community Involvement (SCI) which formalises proposals for consulting the public on planning matters and builds on the wider Planning Services' standard consultation practices.
Outside scope of Local Plan (crime).	N/A to consultation.
Deliver more affordable housing.	Basildon Council notes these comments; we consider that affordable housing provision is reflected in Policy HOU2 Affordable Housing.
Promote regeneration of Billericay High Street.	Chapter 7 Ensuring the Vitality of Town Centres deals with town centre matters.
Ensure existing biodiversity value on sites	Noted, this will be required at planning

Main comments	Basildon Council's response
is correctly assessed.	application stage.
Essex Badger Protection group have provided guidance for mitigating impacts on sites where badger sets may exist.	Information noted.
The site allocation is subject to a current planning application.	Information noted.
Concern around the impact on open spaces and sport and recreation.	Policy relating to open space and sports/recreation facilities are covered under the Regulation 18-part 2 consultation.
Concern about the impacts of development and loss of green spaces on health and wellbeing.	
No clear comment.	N/A to consultation.
Promote renewable energy on new builds	The policies within the climate change chapter have been included to support the drive towards net zero development.
Building more houses will have a negative impact on climate change.	
Concern around the Green Belt Study and classification of grey belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt in order to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Deliver housing on brownfield sites.	
Support for improvements to active and sustainable travel.	Support noted.
Supportive of proposed site allocation.	Support noted.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

- Brownfield sites.
- Industrial areas
- Basildon
- Off A127
- New Town
- Scotland
- Yorkshire
- Courtauld Road
- Pitsea
- Laindon
- Small scale development
- Strategic allocation E2, AS2 and AS3

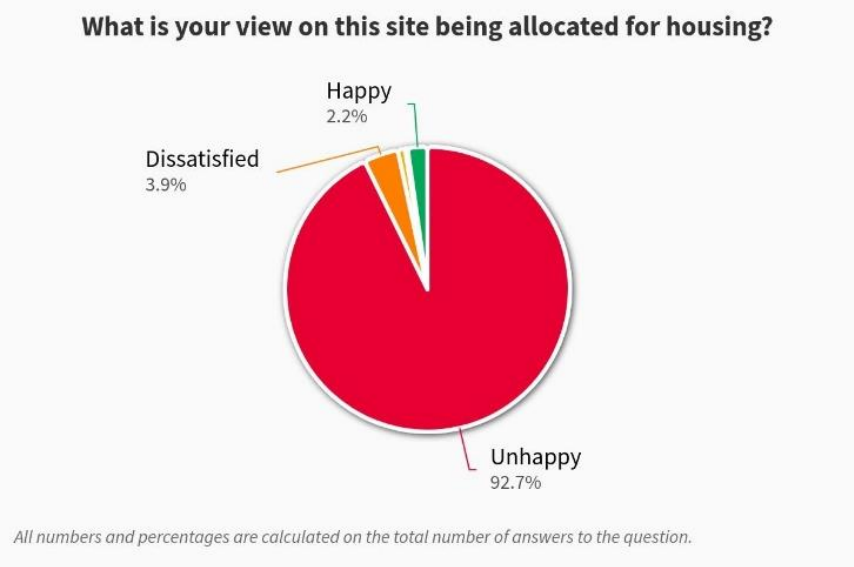
- Sustainable locations
- Crays Hill
- Bring back empty homes to provide supply
- Langdon Hills
- Wat Tyler
- Bowers Gifford
- Wickford
- Luckyn Lane in Basildon
- Land near A13/Saddlers Farm
- Not in the Green Belt
- Rainham
- Not on agricultural land
- Outside of the Borough
- Stock
- Southend

Actions and next steps

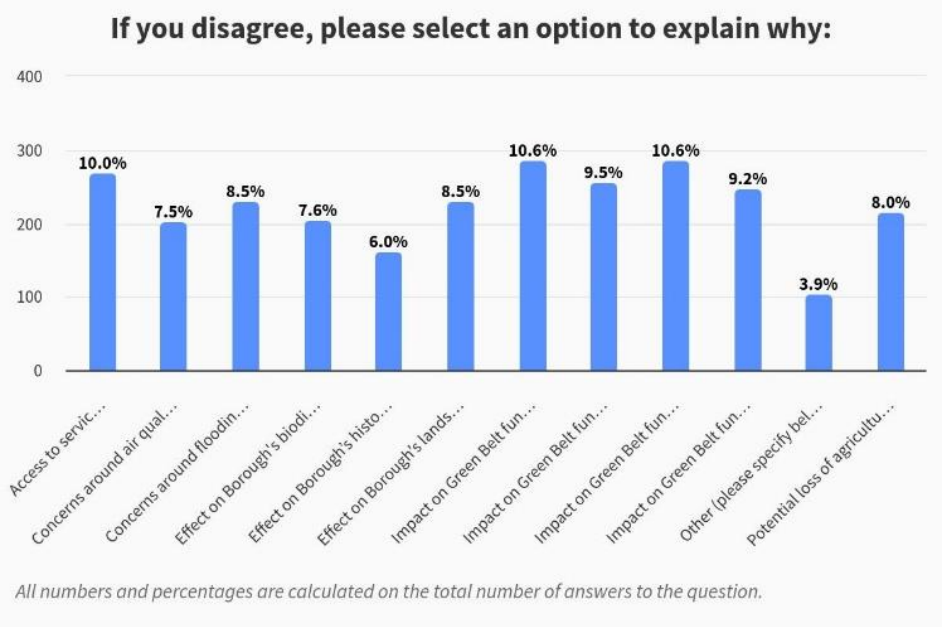
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H3 – Land South of Great Burstead

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	**Basildon Council’s response**
Risk of merging Great Burstead with Noak Bridge.	Additional landscape evidence has been commissioned. This will inform review of the allocation boundaries.
Concern on the impact of development on the character of the area.	The impact of development on the character of an area will be considered at the planning application stage.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Concern on the impact of development in a conservation area.	Any application will be required to be in keeping with the relevant conservation area management plan.
Concern about pollution.	This is addressed by Chapter 13.
Objection to the standard method for	The Council is required to determine the

Main comments	Basildon Council's response
calculating housing need.	minimum number of homes needed using the standard method in national planning practice guidance.
Preserve/protect the green belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt in order to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern of development impacts on biodiversity, habitats and ancient woodlands.	This is addressed by Chapter 11.
Concerns surrounding the loss of agricultural land	This is address by Chapter 13.
Concerns for wellbeing if local green spaces are lost.	This is addressed by the Healthy Communities chapter.
Concerns surrounding suitable transport infrastructure.	Transport capacity modelling has been commissioned.
Concerns surrounding the density of housing.	Revised allocation policies will set out expectations for density.
Concern around bridleway and footpath access	Revised allocation policies will set out expectations for retain or replacement.
Raises concern that residential development near ancient woodlands and SSSIs on the grounds of impact on wildlife specifically badgers.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Restrict development to the current consent on grounds of impact on green belt.	Green belt impact has been considered as part of planning applications.
Potential loss of sports facilities.	Sports facilities are protected by the Health Communities Policies.
Unclear how the housing need has been identified.	As set out in policy SG1, the housing need was calculated using the standard method for calculating minimum housing need as required by the National Planning Policy Framework.
Impact on listed buildings.	A Heritage Impact Assessment has been commissioned and will inform the development of the draft allocation.
Support for affordable housing	Support noted.

Main comments	Basildon Council's response
development.	
Potential loss of publicly accessible open green space.	This is addressed by the Healthy Communities chapter.
Restrict development to brownfield land.	The Council has considered all opportunities to deliver housing on promoted brownfield sites
Utilise grey belt land for development.	A Grey Belt Study has been commissioned and will inform revision of the draft allocations.
Detailed support for delivering for housing from land promoter.	The supplied information will inform revision of the allocations.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

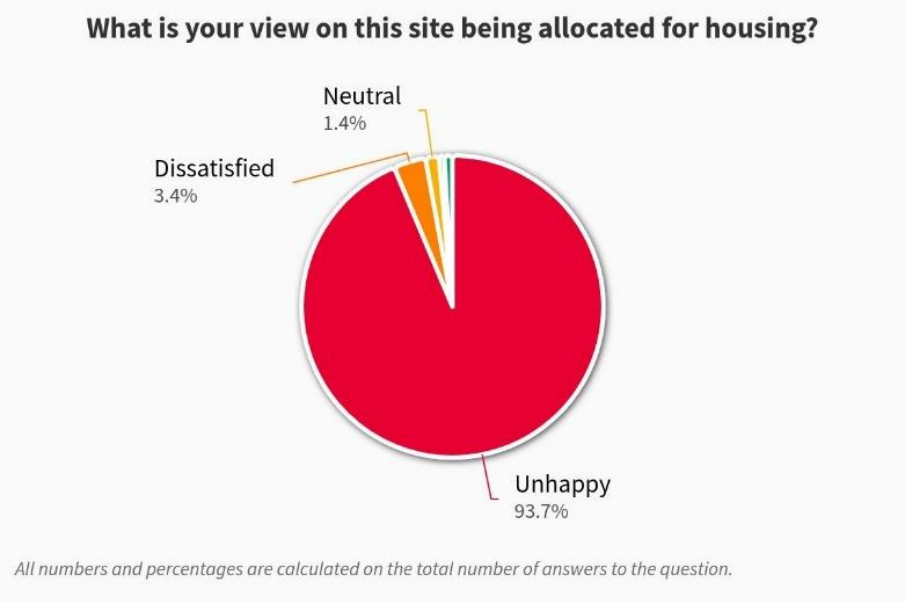
- Brownfield land
- Current employment areas
- Derelict/deteriorated housing
- A new town
- Laindon
- Vange
- North of Billericay
- Wat Tyler
- Crays Hill
- Pitsea
- Basildon town centre
- Wickford
- Locations outside the borough

Actions and next steps

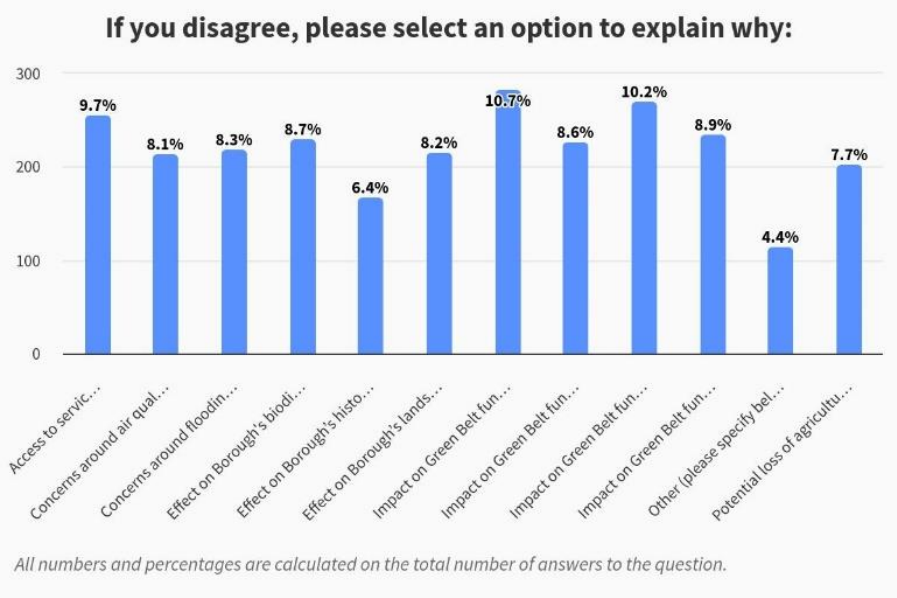
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H4 – Land West of Laindon Road

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	**Basildon Council’s response**
Concern about pollution.	This is addressed by Chapter 13.
Preserve/protect the green belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release

Main comments	Basildon Council's response
	land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concerns surrounding suitable transport infrastructure	Transport capacity modelling has been commissioned.
Concern around bridleway and footpath access	Revised allocation policies will set out expectations for retain or replacement.
Concern of development impacts on biodiversity, habitats and ancient woodlands.	This is addressed by Chapter 11.
Concerns of impact on TPOs.	This is addressed by Chapter 11.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Concern on the impact of development on the character of the area.	The impact of development on the character of an area will be considered at the planning application stage.
Further information regarding the distribution of growth needs to be made clearer.	This is set out in Chapter 3.
Supportive of brownfield development before green belt release.	Support noted.
Loss of separation between Great Burstead and Billericay.	Great Burstead is not regarded as a town.
Objection to the standard method of calculating housing need.	The NPPF requires that minimum housing need is calculated in accordance with the 'standard method' set out in the NPPF/PPG.
Perception housing will be unaffordable to residents.	This is addressed by policy HOU2.
Raises concern that residential development on the grounds of impact on	Policy NE1 Conserving and Enhancing the Natural Environment outlines six

Main comments	Basildon Council's response
wildlife specifically badgers.	expectations for new developments to protect and enhance the natural environment.
Concern about pollution.	This is addressed by Chapter 13.
Require 50% affordable housing.	This is addressed by policy HOU2.
Concerns surrounding the loss of agricultural land	This is address by Chapter 13.
Any development on land released from the Green Belt should be developed to high density.	Allocation policies will set out minimum density requirements to ensure efficient use of land.
Concern around loss of views from Billericay town.	Updated Landscape Impact Assessments have been commissioned and will inform the revision of the allocation.
Objection to the introduction of Grey Belt.	The NPPF December 2024 introduced the concept of Grey Belt. A grey Belt Study has been commissioned.
Potential loss of publicly accessible open green space.	This is addressed by the Healthy Communities chapter.
Detailed support for delivering for housing from land promoter.	The supplied information will inform revision of the allocations.
Consider including land to the East for specialist housing.	The supplied information will inform revision of the allocation.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

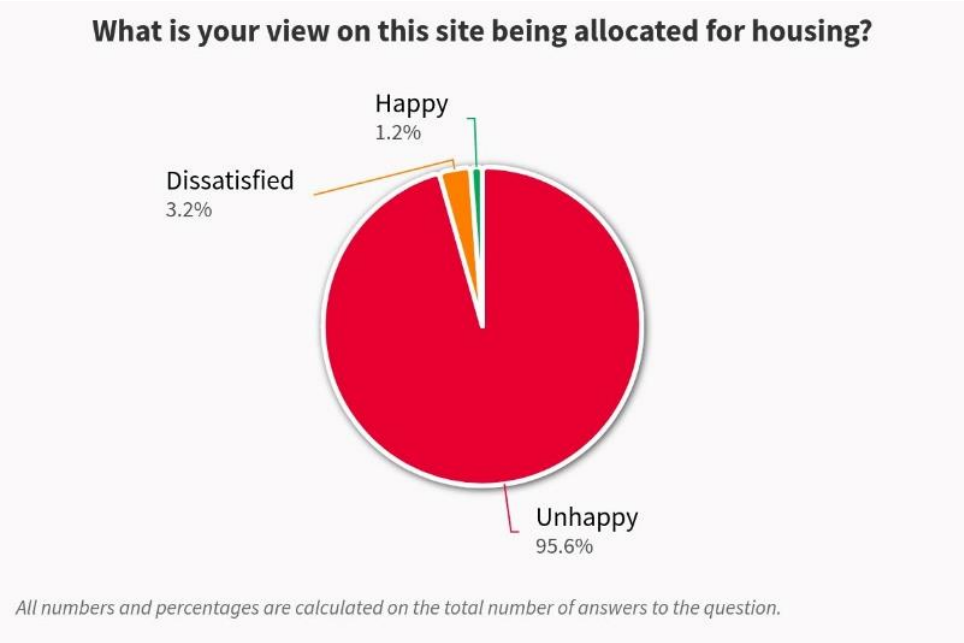
- Brownfield land
- A new town
- Queens Park
- Locations outside the borough
- Basildon Town
- Wat Tyler
- Bowers Gifford
- Langdon hills
- Crays Hill
- Pitsea
- Noak Bridge
- Wickford

Actions and next steps

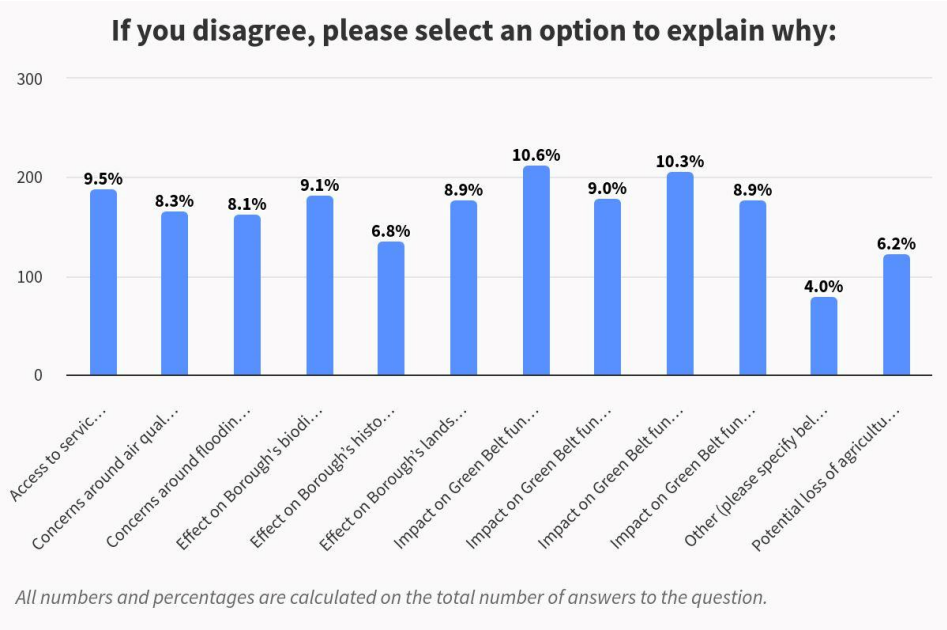
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H5 – Land adjacent to Laindon Common Road, Billericay

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main issues raised were:

Main issues	Basildon Council’s response
Does not support proposed site allocation.	Objection noted.
Supportive of proposed site allocation.	Support noted.

Main issues	Basildon Council's response
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commissioned a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern about urban sprawl.	
Opposition to development on agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern around the sufficient provision of road infrastructure.	
Concern about air pollution from traffic.	Basildon Council has commissioned updated transport modelling which
Concern around road safety.	

Main issues	Basildon Council's response
	considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Support for improvements to active and sustainable travel.	Noted. The Infrastructure Delivery Plan will set out the necessary public transport improvements needed to support the growth proposed by the Local Plan.
Public transport is limited in the area.	
Concern around the impact on open spaces and sport and recreation.	Policy relating to open space, sport and recreation is covered under the Regulation 18-part 2 consultation.
Objection to Standard Method of calculating housing need	To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. Failure to do so would result in the plan being found unsound at examination with resultant reputational and financial risks to the Council.
Concern around the impact of development on the historic character of the area.	The historic environment and potential impacts that development could have will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Concern on the impact of development in a conservation area.	The conservation area and potential impacts that development could have will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Deliver housing on brownfield sites.	The Council has considered all opportunities to deliver housing in the urban area.
Deliver more social/affordable housing.	This is addressed by policy HOU2 – Affordable Housing.
Drainage network needs improvements.	An additional Water Cycle Study is being undertaken for the Borough which will determine whether the existing water supply and wastewater infrastructure can accommodate the development over the plan period.
Concern on the impact of development on the character of the area.	The impact of development on the character of an area will be considered at the planning application stage.

Main issues	Basildon Council's response
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
H5 contravenes the Green Belt's purposes, further refinement is needed.	Noted

We asked: Where do you think employment should be located instead? Comments are summarised as follows:

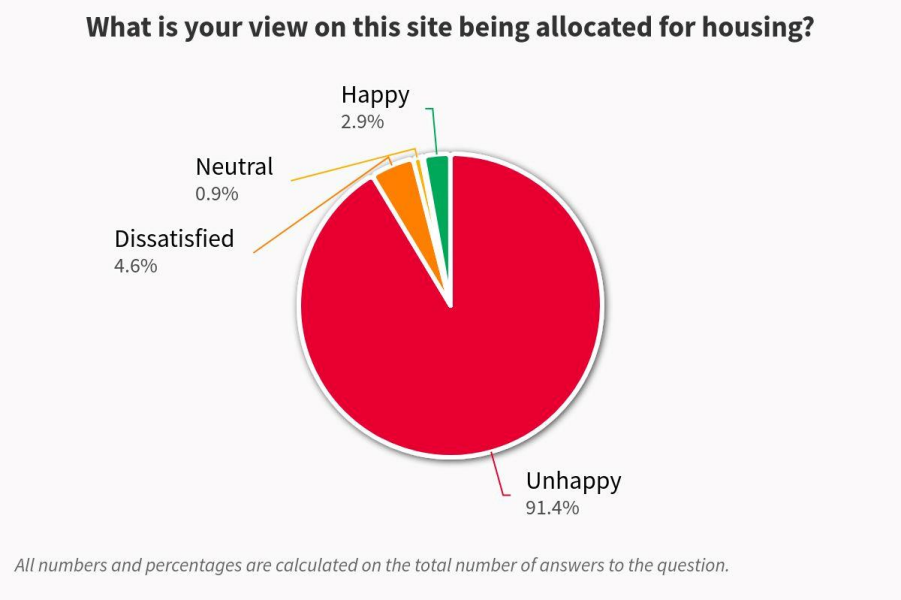
- Outside of the Borough
- Elsewhere in the Borough
- Brownfield, grey belt or previously developed land
- Not in the Green Belt
- Not on agricultural land
- Regenerate existing housing stock / rely on empty homes with higher densities.
- New settlements such as new towns or garden villages

Actions and next steps

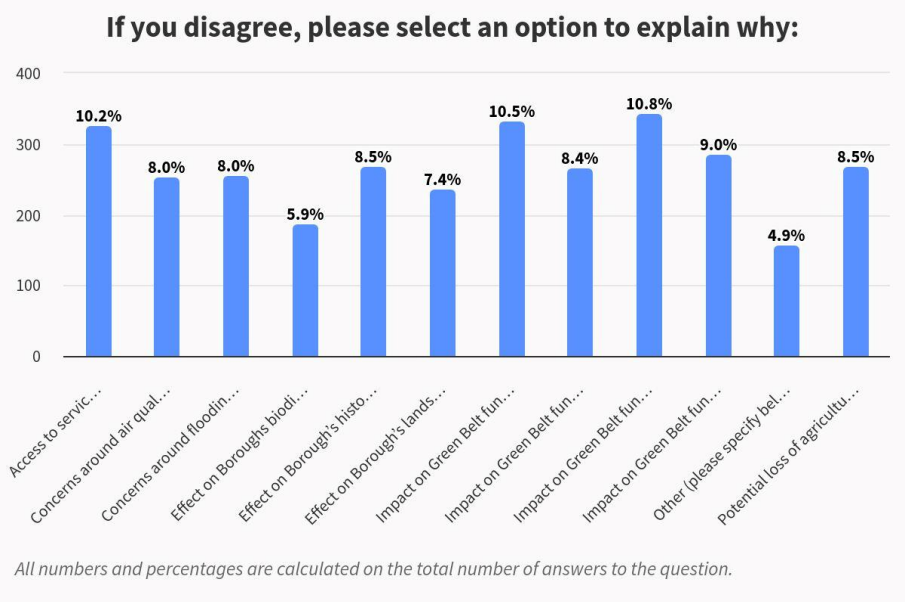
There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the strategic allocation's refinements incorporating emerging additional evidence base work.

H6 - Land south of London Road Billericay

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main issues raised were:

Main issues	**Basildon Council’s response**
Does not support proposed site allocation.	Objection noted.
Supportive of proposed site allocation.	Support noted.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commissioned a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern about urban sprawl.	
Concern around the merging of settlements.	
Concern around encroachment	
Opposition to development on agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.

Main issues	Basildon Council's response
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern around the sufficient provision of road infrastructure.	
Concern about air pollution from traffic.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Concern around road safety.	
Support for improvements to active and sustainable travel.	Noted. The Infrastructure Delivery Plan will set out the necessary public transport improvements needed to support the growth proposed by the Local Plan.
Public transport is limited in the area.	
Concern around the impact on open spaces and sport and recreation.	Policy relating to open space, sport and recreation is covered under the Regulation 18-part 2 consultation.
Objection to Standard Method of calculating housing need	To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. Failure to do so would result in the plan being found unsound at examination with resultant

Main issues	Basildon Council's response
	reputational and financial risks to the Council.
Concern around the impact of development on the historic character of the area.	The historic environment and potential impacts that development could have will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Insufficient parking provision for growth.	The Council will consider setting out a Development Management Policy to address parking standards in the revised Local Plan.
Deliver housing on brownfield sites.	The Council has considered all opportunities to deliver housing in the urban area.
Deliver housing on grey belt sites	In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated. Basildon Council has commissioned a Grey Belt Study to inform the Local Plan.
Deliver more social/affordable housing.	This is addressed by policy HOU2 – Affordable Housing.
Drainage network needs improvements.	An additional Water Cycle Study is being undertaken for the Borough which will determine whether the existing water supply and wastewater infrastructure can accommodate the development over the plan period.
Support for delivering smaller properties/starter homes.	Policy HOU1 sets out to deliver a range of housing including smaller sized homes.
Support for flatted / higher density development.	Noted.
Supports the delivery of specialist housing for older people	Policy HOU3 sets out to deliver a range of specialist housing for older people.
Concern on the impact of development on the character of the area.	The impact of development on the character of an area will be considered at the planning application stage.
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Supports a whole plan viability appraisal	The Plan will be supported by a Viability Assessment at Regulation 19 that will consider the cumulative policy requirements of the Plan on development in the Borough to ensure deliverability and viability.

Main issues	Basildon Council's response
Promoting land within a proposed housing allocation.	Land promotion noted.
Proposes the refinement of the allocation.	Noted.
Supports ongoing engagement with the Local Plan process.	Support noted.

We asked: Where do you think employment should be located instead? Comments are summarised as follows:

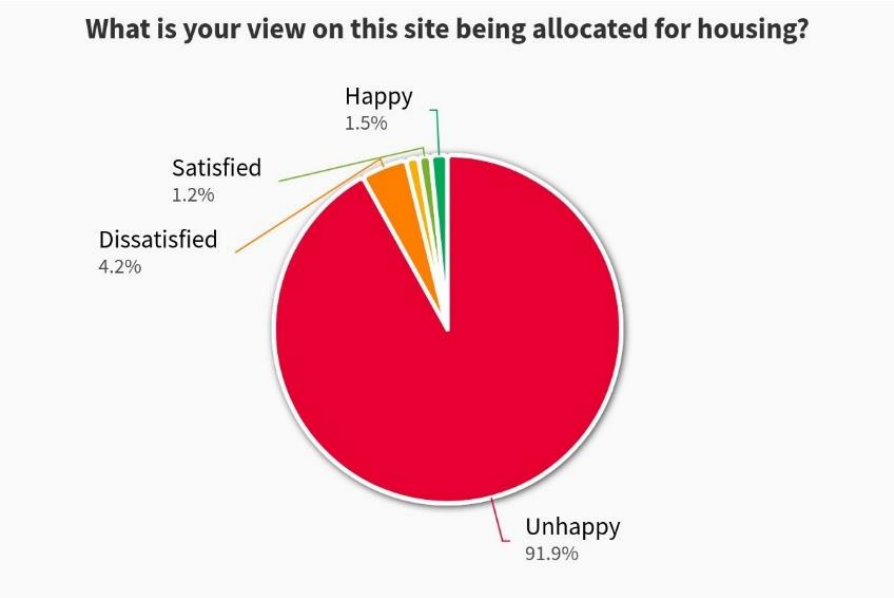
- Outside of the Borough
- Elsewhere in the Borough
- Brownfield, grey belt or previously developed land
- Not in the Green Belt
- Regenerate existing housing stock / rely on empty homes
- New settlements such as new towns or garden villages

Actions and next steps

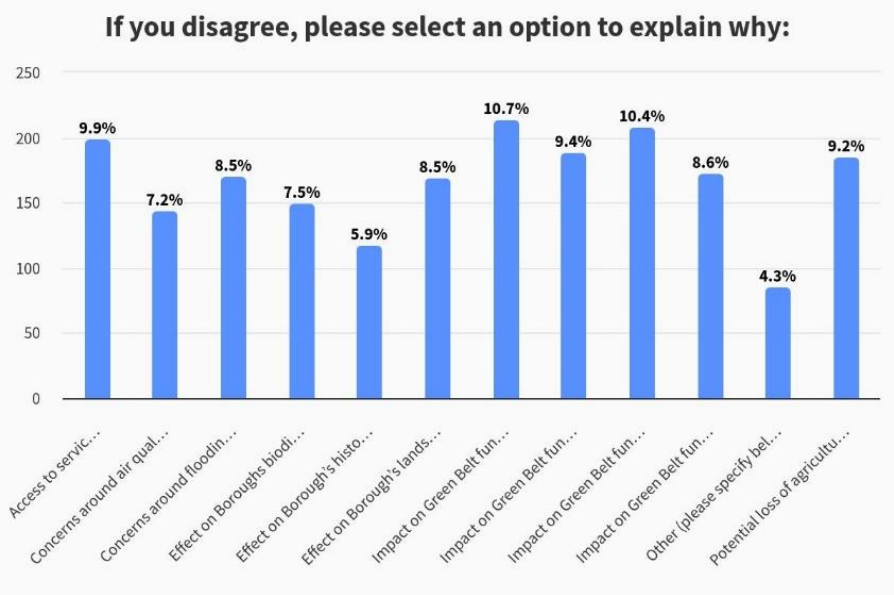
There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the strategic allocation's refinements incorporating emerging additional evidence base work.

H7 - Land west of Mountnessing Road

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main issues raised were:

Main comments	**Basildon Council’s response**
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Objection to Standard Method of calculating housing need	Basildon Council has considered this and it would not be appropriate because it contradicts national policy and evidence. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. Failure to do so would result in the plan being found unsound at examination with resultant reputational and financial risks to the Council.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey
Concern around encroachment	

Main comments	Basildon Council's response
	Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern about urban sprawl.	
Concern for overcrowding	
Concern around the impact on wildlife and/or the natural environment.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern about access to the proposed site.	Access to any site allocations will be reviewed as part of the site refinement exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.
Highlights risk of flooding.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Loss of agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.
Concern about air pollution from traffic.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Concern around noise pollution.	
Concern around the Green Belt Study and classification of grey belt	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt in order to meet
Deliver housing on brownfield/grey belt sites.	

Main comments	Basildon Council's response
	the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Deliver more affordable housing.	Basildon Council notes these comments; we consider that affordable housing provision is reflected in Policy HOU2 Affordable Housing.
Promote regeneration of Billericay High Street	Chapter 7 Ensuring the Vitality of Town Centres deals with town centre matters.
Concern around the impact on open spaces and sport and recreation.	Policy relating to open space and sports/recreation facilities are covered under the Regulation 18-part 2 consultation.
Supportive of proposed site allocation.	Support noted.
Supports this as a sustainable location for growth with existing infrastructure.	Support noted.
Essex Badger Protection group have provided guidance for mitigating impacts on sites where badger sets may exist.	Information noted.
Concern about impact on existing habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Ensure existing biodiversity value on sites is correctly assessed	Noted, this will be required at planning application stage.
The site allocation was promoted in the withdrawn local plan and subject to a current planning application.	Information noted.
Concern that allocation is not a sustainable location for growth	All strategic sites are undergoing further refinement following the Regulation 18 consultation and will be updated as further evidence base work is undertaken.
Objects to proposed allocation.	Objection noted.
Promote renewable energy on new builds	The policies within the climate change chapter have been included to support the drive towards net zero development.
Highlights the issue of viability concerns of a site for development	The Plan will be supported by a Viability Assessment at Regulation 19 that will consider the cumulative policy requirements of the Plan on development

Main comments	Basildon Council's response
	in the Borough to ensure deliverability and viability.
Suggest revision of the site allocation assessment against the IIA objectives of the Local Plan.	All strategic sites are undergoing further refinement following the Regulation 18 consultation and will be updated as further evidence base work is undertaken.
Review site allocations to clarify which fall within grey belt/golden rules designations.	
Supportive of proposed site allocation.	Support noted

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

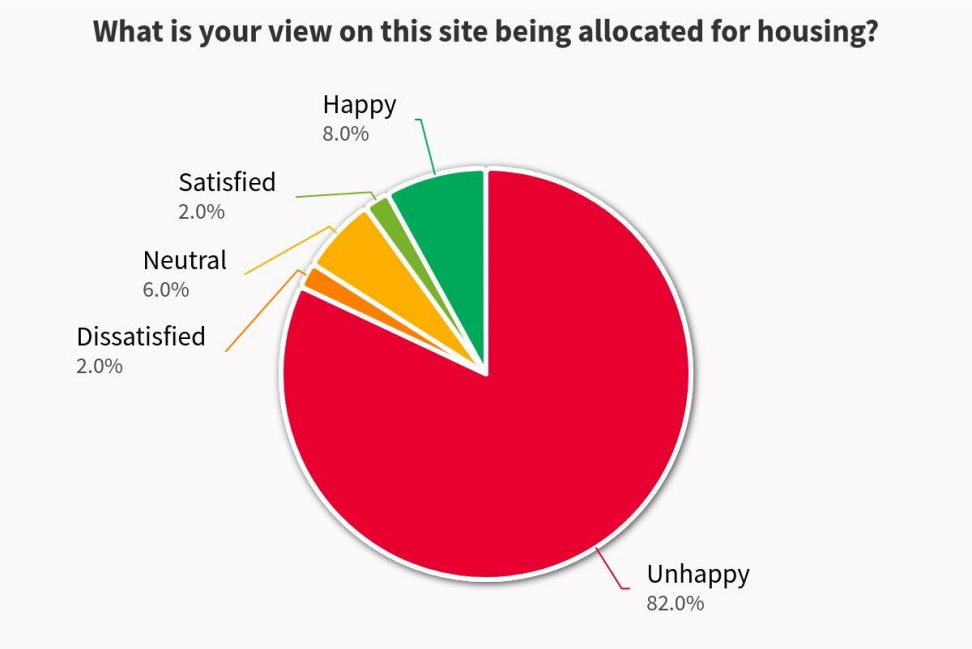
- Brownfield sites.
- The need to reduce demand/limit development
- Small scale development
- Not in the Green Belt
- Bring back empty homes to provide supply
- Crays Hill
- Ingatestone
- New Town
- Sustainable locations
- Outside of the Borough
- Queen Park estate, Basildon
- Basildon
- Off A127
- Wat Tyler
- Kent
- Industrial areas
- Wickham bishop
- Chelmsford
- Laindon
- Wickford

Actions and next steps

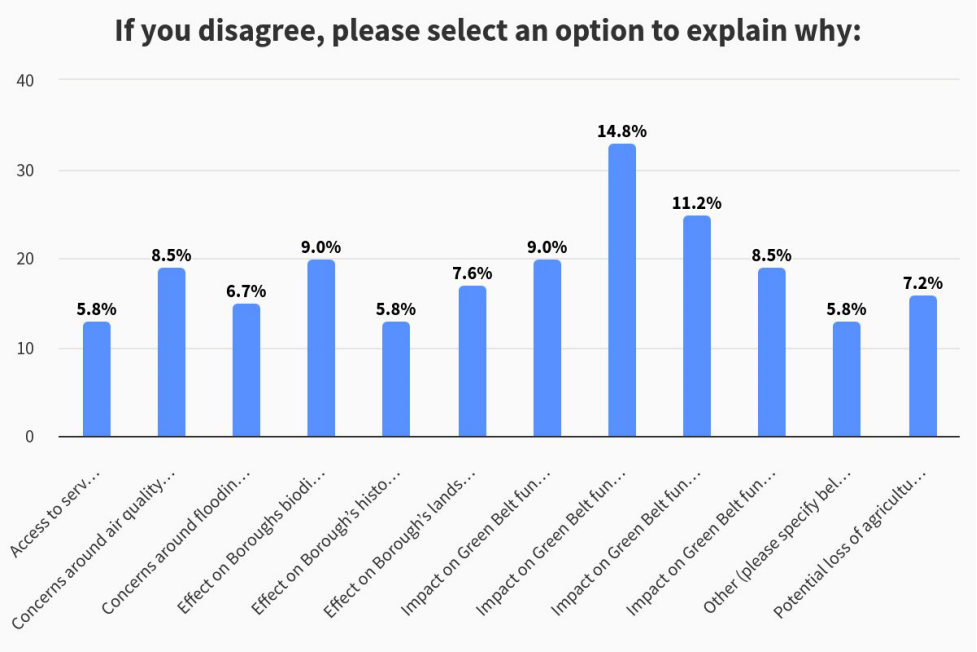
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H8- Land West of Bowers Gifford

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main issues raised were:

Main comments	Basildon Council’s response
Concern on the impact of development on the character of the area.	The impact of development on the character of an area will be considered at the planning application stage.

Main comments	Basildon Council's response
Protect Heritage assets.	The historic environment and potential impacts that development could have will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern about merging of settlements.	
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Lack of health facilities.	
Lack of education provision.	
Proposed site is not deliverable.	The Plan will be supported by a Viability Assessment at Regulation 19 that will consider the cumulative policy requirements of the Plan on development in the Borough to ensure deliverability and viability.
Concern around the sufficient provision of road infrastructure.	Transport capacity modelling has been commissioned.
Concern about increased traffic.	
Concern about access to the proposed site.	Access to any site allocations will be reviewed as part of the site refinement exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.
Site is currently used for sport, recreation and access to green space.	Policy relating to sport and community facilities is covered under the Regulation 18-part 2 consultation. The Council recognises the importance of all green spaces across the Borough, and the plan includes several policies

Main comments	Basildon Council's response
	which seek to ensure they are preserved and enhanced which were included in the Regulation 18-part 2 consultation.
Concern about impact on existing habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern of development impacts on biodiversity and habitats.	
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Does not support housing allocation H8.	Objection for site allocation noted.
Opposition to development on agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.
Supportive of site H11.	Support noted.
Concern about the impacts of development and loss of green spaces on health and wellbeing.	Policy relating to sport and community facilities is covered under the Regulation 18-part 2 consultation.
Concern about pollution.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Preserve open spaces.	Policy relating to open space is covered under the Regulation 18-part 2 consultation.
Support for housing allocation H8.	Support noted.
Does not support housing allocation H8.	Objection for site allocation noted.

Main comments	Basildon Council's response
Site location H8 does not contribute to the purposes of protecting the green belt in Basildon Council's evidence base.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

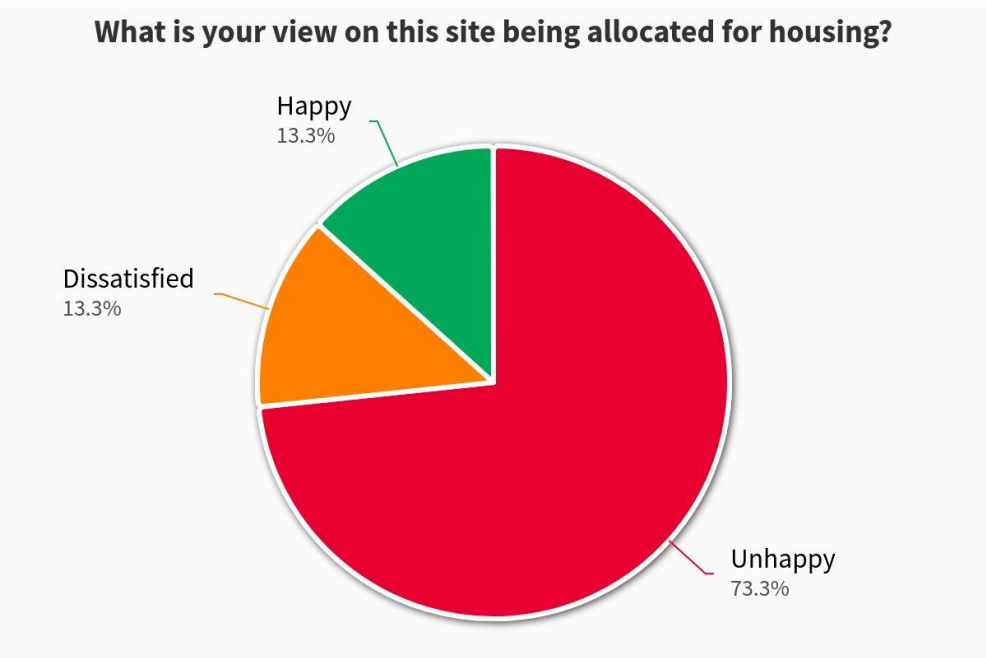
- Site allocation AS3
- Not Pitsea or Bowers Gifford
- Brownfield sites.

Actions and next steps

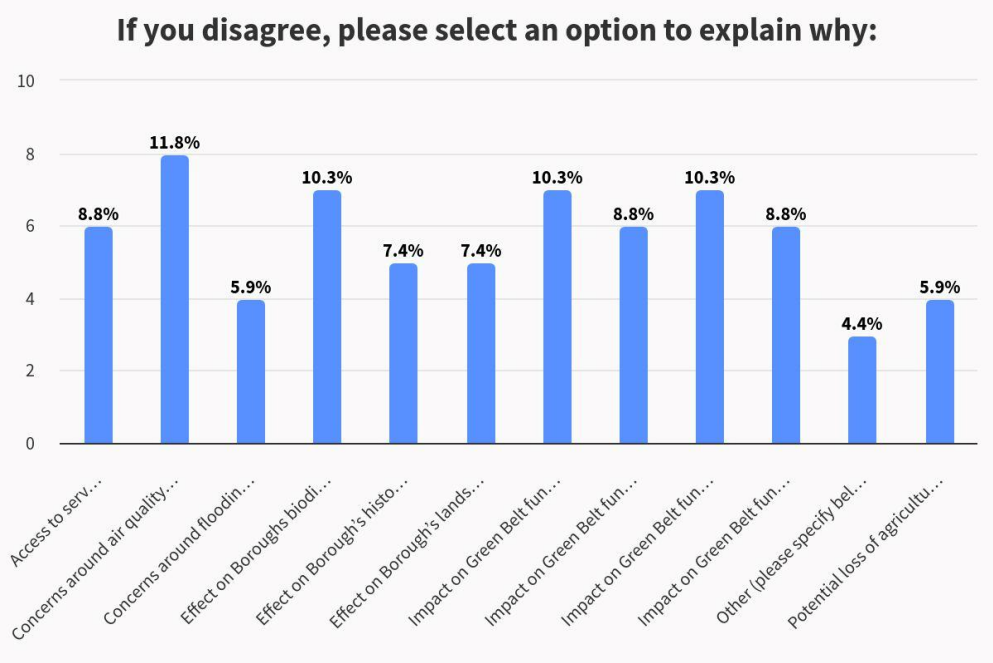
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H9 – Land South of A13

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main issues raised were:

Main comments	Basildon Council’s response
Preserve/protect the Green belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Does not support proposed site allocation.	Objection noted.
Matters outside the scope of a local plan.	N/A to consultation.
Concern about access to the proposed site.	Access to any site allocations will be reviewed as part of the site refinement exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.
Preservation of Local Wildlife Sites (LoWS).	This is covered under Policy NE2.
Cumulative impact of new developments needs to be considered	The Plan will be supported by a Viability Assessment at Regulation 19 that will

Main comments	Basildon Council's response
rather than sites in isolation.	consider the cumulative policy requirements of the Plan on development in the Borough to ensure deliverability and viability.
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Ensure existing biodiversity value on sites is correctly assessed.	Noted, this will be required at planning application stage.
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Does not support level of proposed growth in Billericay.	Objection noted.
Concern on air quality issues.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Concern on the impact of development on the character of the area.	The impact of development on the character of an area will be considered at the planning application stage.
Prioritise the delivery of supporting infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Consider health and wellbeing.	Policy relating to healthy communities is covered under the Regulation 18-part 2 consultation.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Protect and enhance parks, public open	Policy relating to open space is covered

Main comments	Basildon Council's response
spaces and blue infrastructure; while improving their accessibility.	under the Regulation 18-part 2 consultation.
Irreplaceable habitats, especially veteran and ancient trees, should be protected from loss and damage.	Comments noted. Policies NE1 and NE2 seek to preserve and enhance the natural environment and important habitats.
Support for housing allocation H9.	Support noted.
Site is in a sustainable location.	Comment noted.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

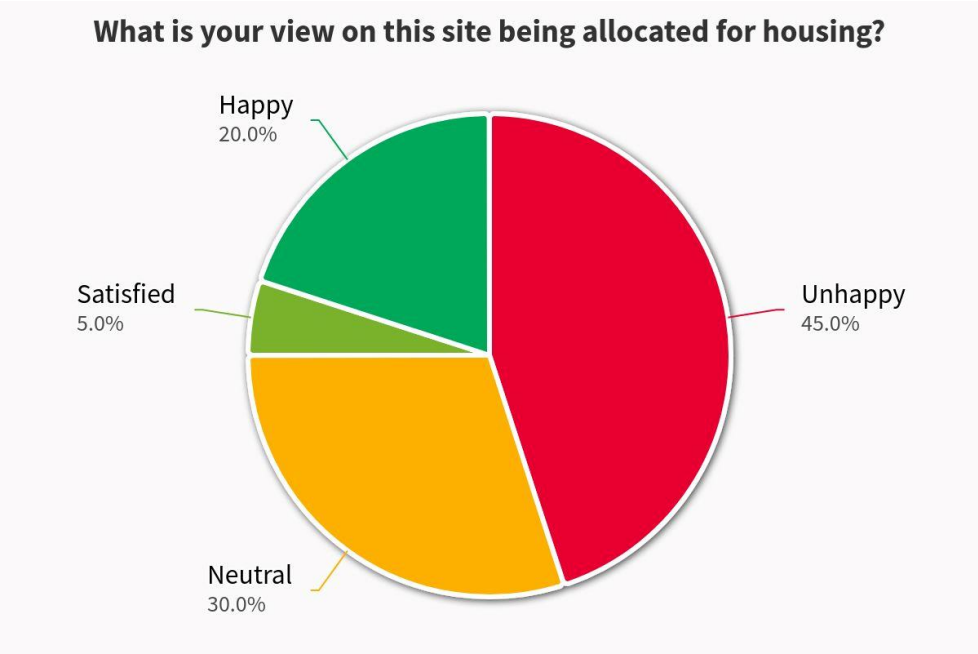
- Not on Green Belt or agricultural land
- A New Town
- Site AS3.

Actions and next steps

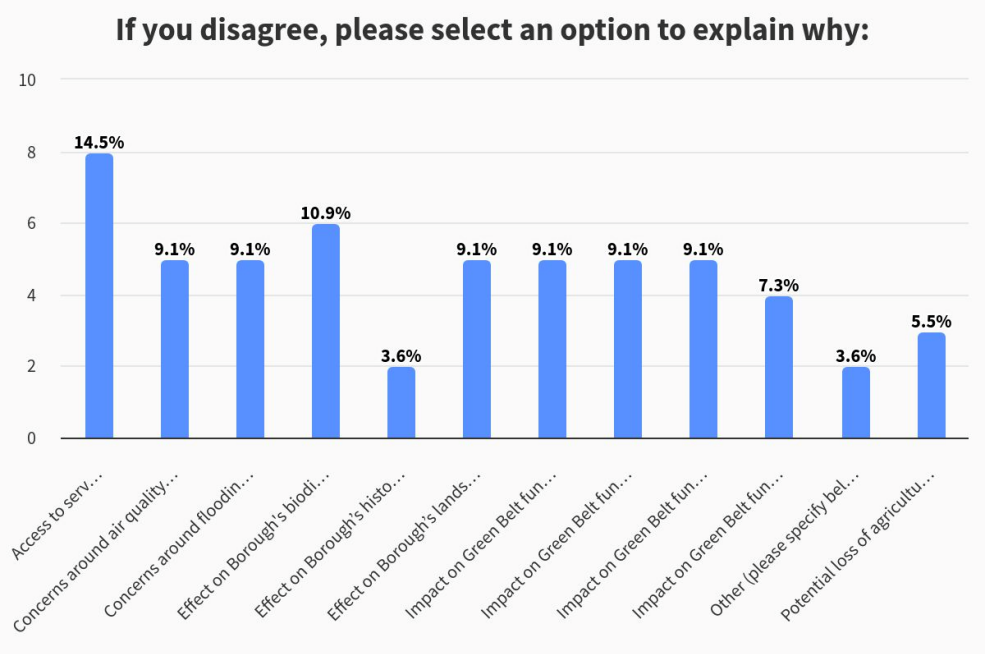
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H10 – Land North of A13

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main issues raised were:

Main comments	**Basildon Council’s response**
Concern of the impact of new housing development on the road network and traffic	Transport capacity modelling has been commissioned.
Cumulative impact of new developments needs to be considered rather than sites in isolation.	The Plan will be supported by an Infrastructure Delivery Plan and a Viability Assessment at Regulation 19 that will consider the cumulative requirements of the Plan on development in the Borough to ensure deliverability and viability.
Concern about impact on existing habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern of development impacts on biodiversity and habitats.	
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Support for housing allocation H10.	Support noted.

We asked:
Where do you think housing should be located instead? Comments are summarised as follows:

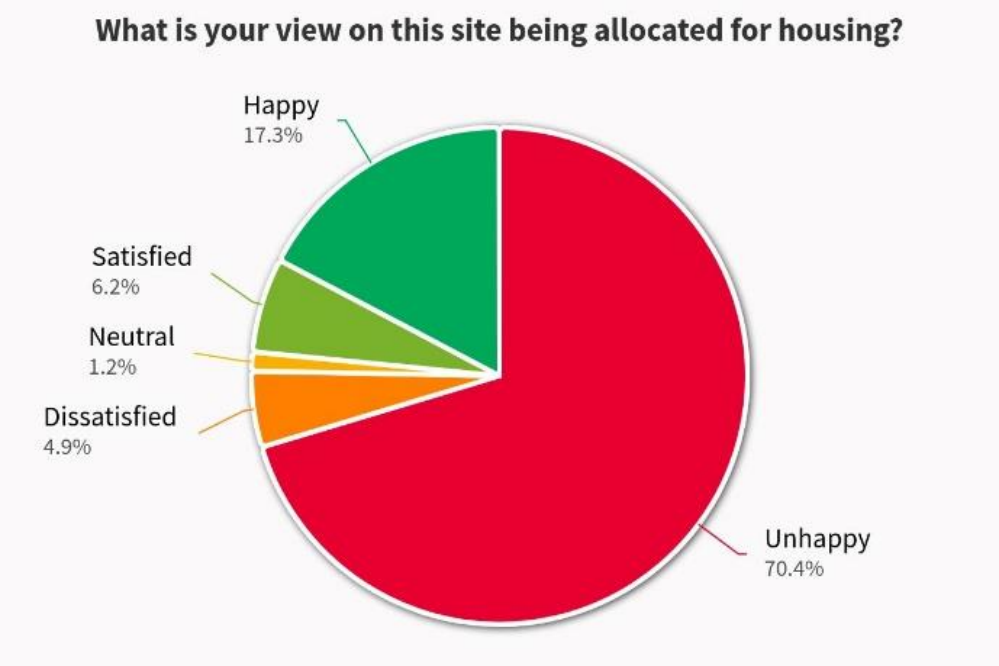
- Brownfield sites.

Actions and next steps

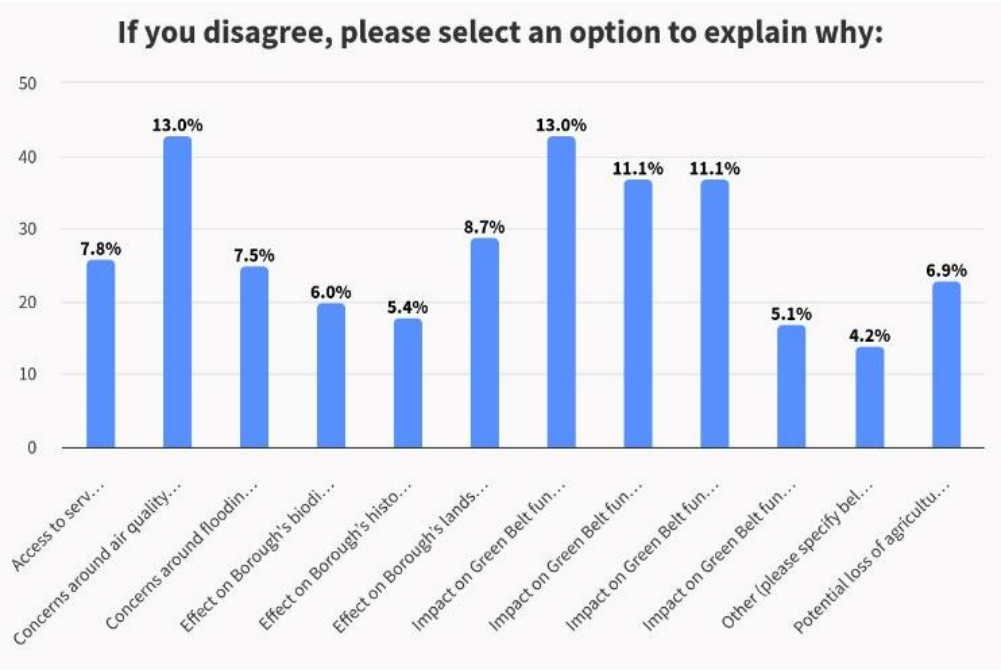
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H11 – Land West of West Mayne

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main issues raised were:

Main comments	Basildon Council’s response
Concern around the merging of settlements.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Preserve/protect Green Belt.	
Concern about urban sprawl.	
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Existing infrastructure is limited and would not support additional dwellings.	
Concern around sufficient provision of employment opportunities.	Chapter 5 Building a Strong Competitive Economy deals with employment matters.
Concern of the impact of new housing development on the road network and traffic	Transport capacity modelling has been commissioned.
Concern about air pollution from traffic.	
Concern around the sufficient provision of road infrastructure.	
Concern about increased traffic.	
Concern on the impact of development on the character of the area.	The impact of development on the character of an area will be considered at the planning application stage.
Does not support proposed site allocation.	Objection for site allocation noted.
Supportive of proposed site allocation.	Support noted.
Need to encourage public footpath connections for active travel.	An updated Local Walking and Cycling Infrastructure Plan is being prepared. This will set out priorities for new and improved walking and cycling routes.
Proposed site allocation is not in the most sustainable location.	All strategic sites are undergoing further refinement following the Regulation 18 consultation and will be updated as

Main comments	Basildon Council's response
	further evidence base work is undertaken.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Loss of agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.
Growth should not be excessive.	National Policy sets out the minimum housing growth required in Basildon Borough over the Local Plan Period.
Insufficient secondary school provision.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Need for additional shopping facilities.	Evidence from the Retail and Leisure study does not suggest there is a need for new allocations for retail floorspace. However, the Local Plan will encourage localised shopping provision on strategic housing sites to serve the day-to-day needs of residents.
Concern about impact on existing habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern of the impact of development to the natural environment.	
Concern of development impacts on biodiversity and habitats.	
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Supportive of brownfield development.	Support noted.
Matters outside the scope of the Local Plan.	N/A to consultation.

Main comments	Basildon Council's response
Concern around a major pipeline located at the site.	Comment noted. Site constraints such as utilities are reviewed throughout the site refinement process and statutory consultees are consulted with regards to such matters to ensure mitigation measures can be put it place if required.
Cumulative impact of new developments needs to be considered rather than sites in isolation.	The Plan will be supported by an Infrastructure Delivery Plan and a Viability Assessment at Regulation 19 that will consider the cumulative requirements of the Plan on development in the Borough to ensure deliverability and viability.
Support for housing allocation H11.	Support noted.
Site is in a sustainable location.	Comment noted.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

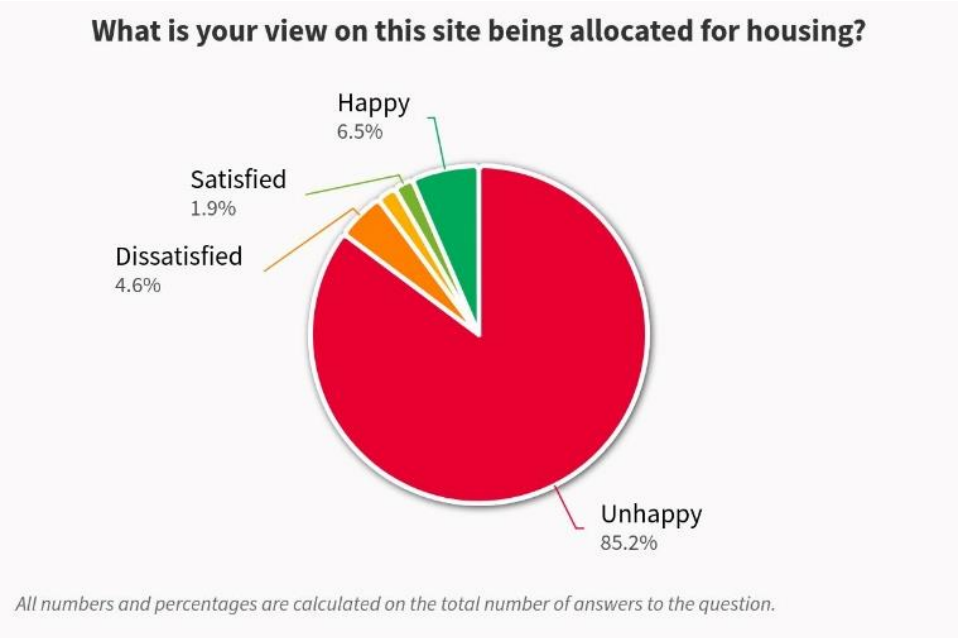
- Not in the Green Belt
- North of the A127
- Strategic allocation AS3
- North of Dunton Road
- Industrial areas
- Brownfield land
- Basildon
- Billericay
- Basildon
- Not on strategic allocation H11
- Outside of the Borough
- Sustainable locations
- Runwell
- A130
- Bring back empty homes to provide supply
- Up north
- Brentwood.

Actions and next steps

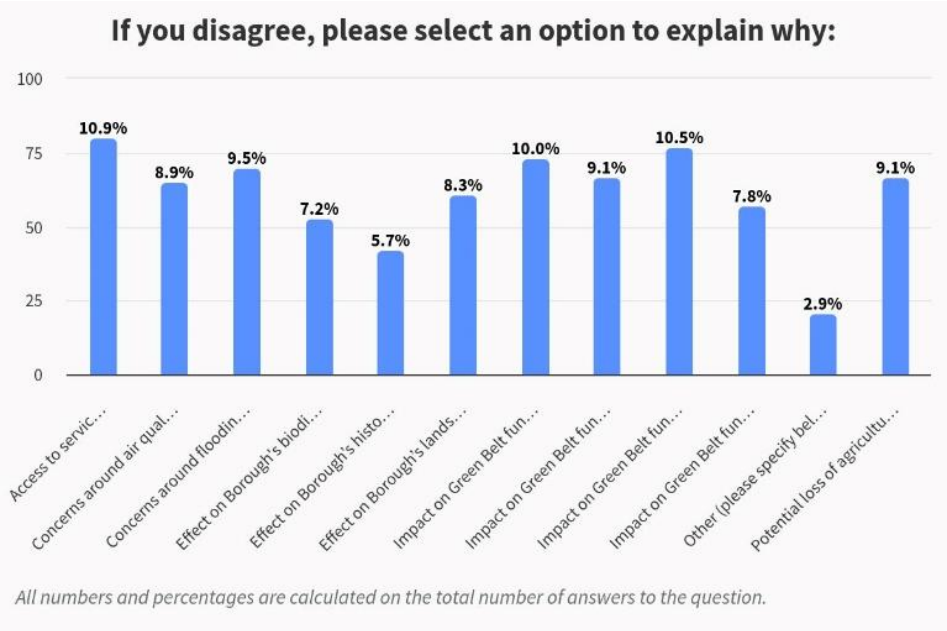
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H12 – Land adjacent to Dunton Road

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main issues raised were:

Main comments	**Basildon Council’s response**
Does not support proposed site allocation.	Objection noted.
Supportive of proposed site allocation.	Support noted.

Main comments	Basildon Council's response
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commissioned a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern about urban sprawl.	
Concern around the merging of settlements.	
Concern around the classification of grey belt	
Opposition to development on agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern around the sufficient provision of road infrastructure.	
Concern about air pollution from traffic.	Basildon Council has commissioned

Main comments	Basildon Council's response
Concern around road safety.	updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Support for improvements to active and sustainable travel.	Noted. The Infrastructure Delivery Plan will set out the necessary public transport improvements needed to support the growth proposed by the Local Plan.
Public transport is limited in the area.	
Concern around the impact on open spaces and sport and recreation.	Policy relating to open space, sport and recreation is covered under the Regulation 18-part 2 consultation.
Objection to Standard Method of calculating housing need	To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. Failure to do so would result in the plan being found unsound at examination with resultant reputational and financial risks to the Council.
Concern around the impact of development on the historic character of the area.	The historic environment and potential impacts that development could have will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Concern about access.	Access to any site allocations will be reviewed as part of the site refinement exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.
Insufficient parking provision for growth.	The Council will consider setting out a Development Management Policy to address parking standards in the revised Local Plan.
Deliver housing on brownfield sites.	The Council has considered all opportunities to deliver housing in the urban area.
Deliver more social/affordable housing.	This is addressed by policy HOU2 – Affordable Housing.
Drainage network needs improvements.	An additional Water Cycle Study is being undertaken for the Borough which will determine whether the existing water supply and wastewater

Main comments	Basildon Council's response
	infrastructure can accommodate the development over the plan period.
Support for housing delivery	Support noted.
Concern on the impact of development on the character of the area.	The impact of development on the character of an area will be considered at the planning application stage.
Conflicts with several strategic objectives.	The consultation comments received allow the Council to continue to review and amend the strategic objectives accordingly.
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Support housing allocation H12.	Support noted.
Promoting land within a proposed housing allocation.	Land promotion noted.
Promoting land in an alternative location which has not been allocated in the draft Local Plan.	Land promotion noted.

We asked: Where do you think employment should be located instead? Comments are summarised as follows:

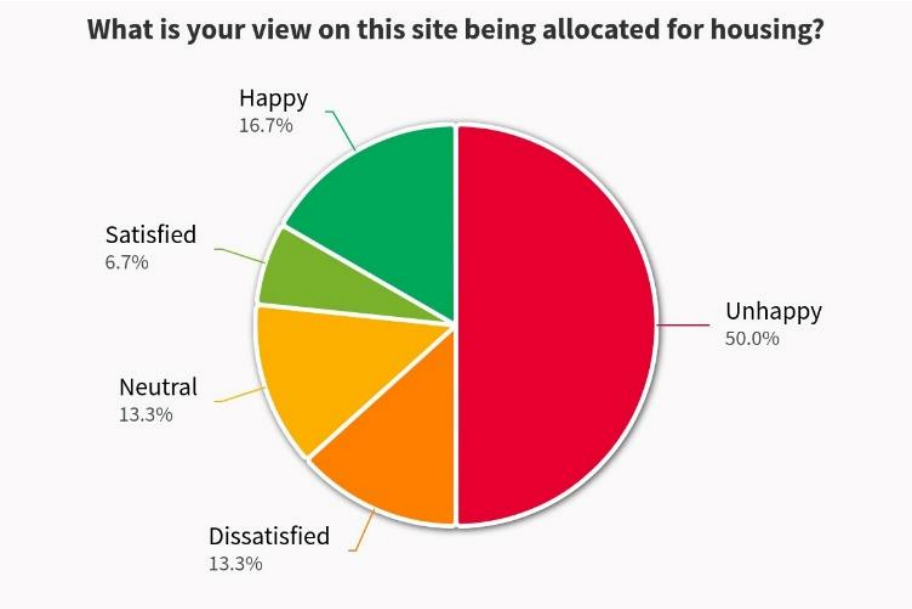
- Outside of the Borough
- Elsewhere in the Borough
- Brownfield, grey belt or previously developed land
- Not in the Green Belt
- New settlements such as new towns or garden villages.

Actions and next steps

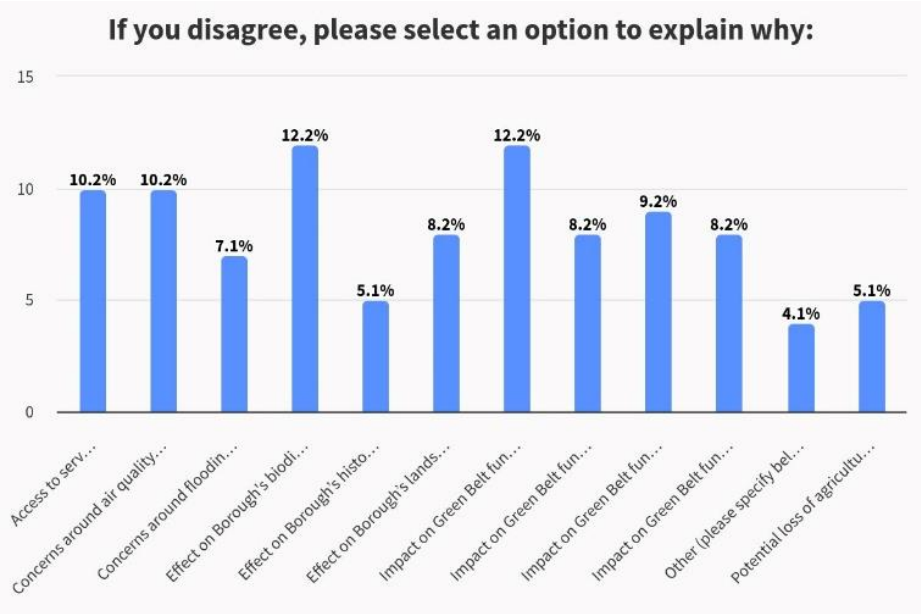
There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the strategic allocation's refinements incorporating emerging additional evidence base work.

H13 - London Road, Vange

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main issues raised were:

Main comments	**Basildon Council’s response**
Supportive of proposed site allocation.	Support noted.
Does not support proposed site allocation.	Objection for site allocation noted.
Site located within a sustainable location.	Support noted.

Main comments	Basildon Council's response
Preservation of Local Wildlife Sites (LoWS).	Policy NE2 seeks the conservation and enhancement of Local Wildlife Sites.
Concern about impact on existing habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
The proposed allocation features important biodiversity.	
Concern of development impacts on biodiversity and habitats.	
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Concern about impact on the landscape.	The Council accepts that development is likely to result in some change to the landscape, but it does not consider all change to be negative or that all landscapes are unable to accommodate some change. Development, where sensitively designed to respond to its context, can enhance existing landscape character by reinforcing or framing valued features and restoring degraded elements of the landscape. The Council is undertaking Landscape and Visual Impact Assessments to assess the proposed sites for any potential significance to landscape change.
Matters outside the scope of a local plan.	N/A to consultation.
Support for housing allocation H13.	Support noted.
Site located within a sustainable location.	Support noted.
General comments about allocation H13.	Comments noted.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

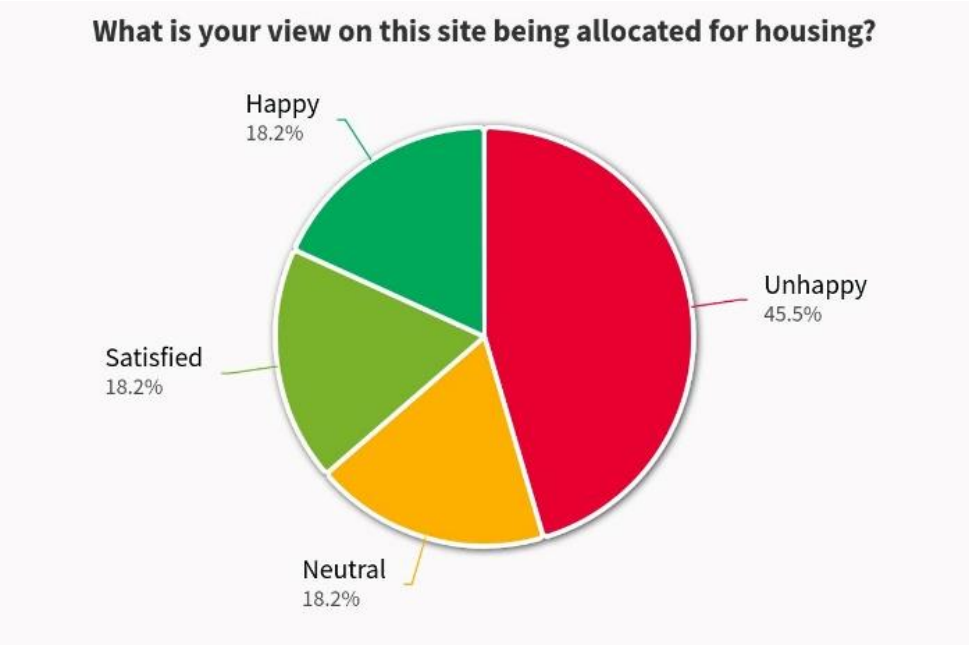
- Billericay
- Brentwood
- Brownfield land

Actions and next steps

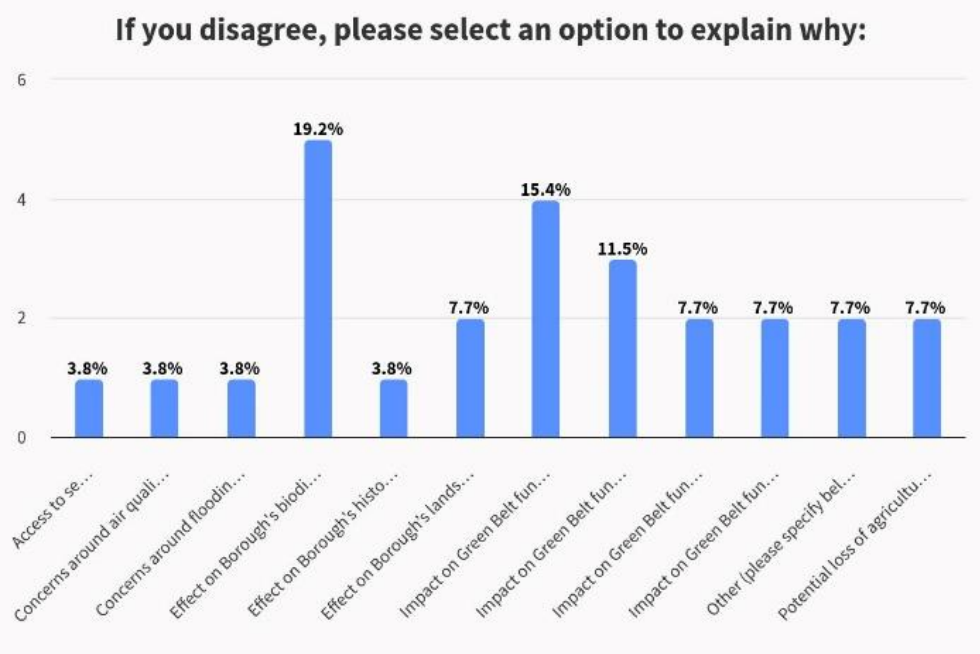
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H14 – Land South of London Road, Basildon

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main issues raised were:

Main comments	Basildon Council’s response
More detail required on policy requirements.	Further detail on policy requirements for each strategic site will be provided as part of the Regulation 18-part 3

Main comments	Basildon Council's response
	consultation
Concern school would be lost if this site was developed.	The Plan will be supported by an Infrastructure Delivery Plan and a Viability Assessment at Regulation 19 that will consider the cumulative requirements of the Plan on development in the Borough to ensure deliverability and viability.
Concern about impact on existing biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Ensure existing biodiversity value on sites is correctly assessed.	Noted, this will be required at planning application stage.
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Concern around the impact of development on the historic character of the area.	The historic environment and potential impacts that development could have will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Concern around the impact on the historical views of the site.	
Support for housing allocation H14.	Support noted.
The development potential of the site is limited due to site constraints.	All strategic sites are undergoing further refinement following the Regulation 18 consultation and will be updated as further evidence base work is undertaken.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

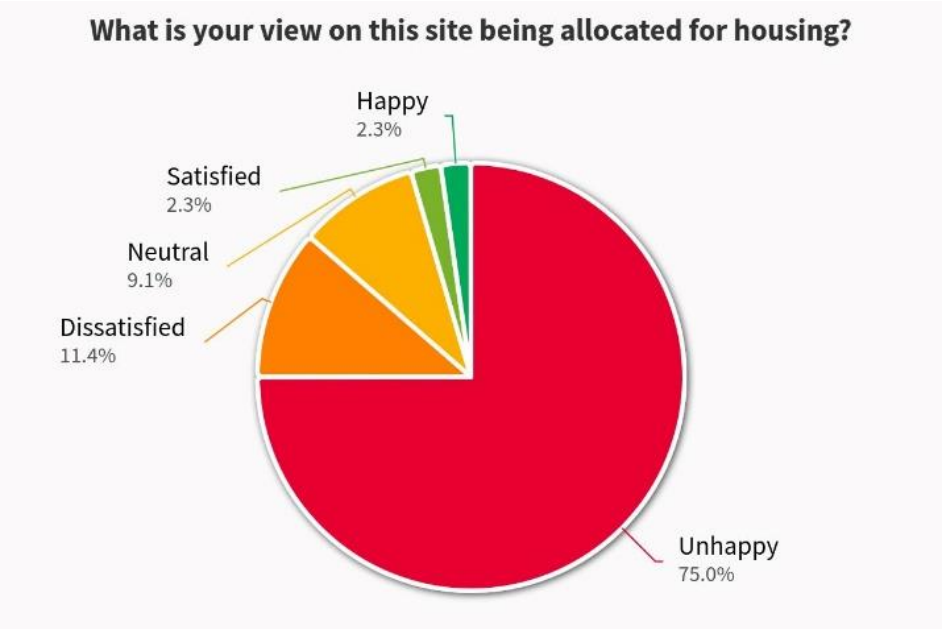
- Not in the Basildon Borough
- Other sites are objected to more than this one.

Actions and next steps

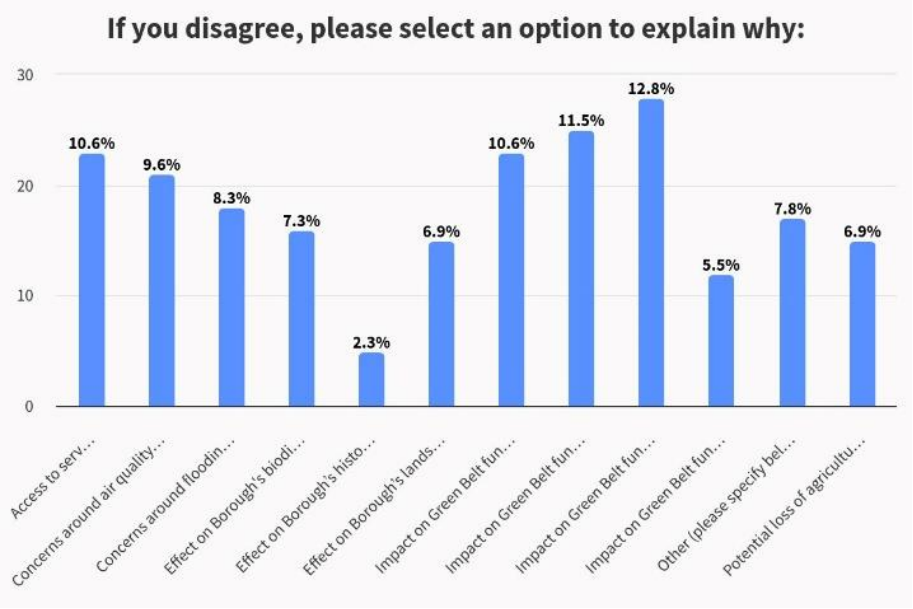
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H15 – Land adj. to Nevendon Road

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	Basildon Council’s response
Support for housing allocation H15.	Support noted.
Prioritise the delivery of supporting infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required,

Main comments	Basildon Council's response
	when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Improve public transport and active travel options.	Noted. The Infrastructure Delivery Plan will set out the necessary public transport improvements needed to support the growth proposed by the Local Plan. An updated Local Walking and Cycling Infrastructure Plan is being prepared. This will set out priorities for new and improved walking and cycling routes.
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Ensure existing biodiversity value on sites is correctly assessed.	Noted, this will be required at planning application stage.
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern about access to the proposed site.	Access to any site allocations will be reviewed as part of the site refinement exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.
Need for better quality shopping/facilities.	Evidence from the Retail and Leisure study does not suggest there is a need for new allocations for retail floorspace. However, the Local Plan will encourage localised shopping provision on strategic housing sites to serve the day-to-day needs of residents
Concern on air quality issues.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the

Main comments	Basildon Council's response
	Local Plan.
Does not support housing allocation H15.	Objection for site allocation noted.
Preserve/protect Green Belt	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt in order to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern around the merging of settlements.	
Concern about impact on existing habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Irreplaceable habitats, especially veteran and ancient trees, should be protected from loss and damage.	Comments noted. Policies NE1 and NE2 seek to preserve and enhance the natural environment and important habitats/species.
The site forms part of an important wildlife corridor.	
Local plans should address the needs of protected species.	
Preservation of woodlands.	
Suggests allocation be for employment rather than housing.	Noted. The potential uses on the strategic sites will be reviewed as part of the site refinement exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.
Support for housing allocation H15.	Support noted.
Support for allocation H15 to include the development of a data centre and appropriate associated policy requirements.	Noted. The potential uses on the strategic sites will be reviewed as part of the site refinement exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

- Not in Wickford
- South of Pitsea and Vange

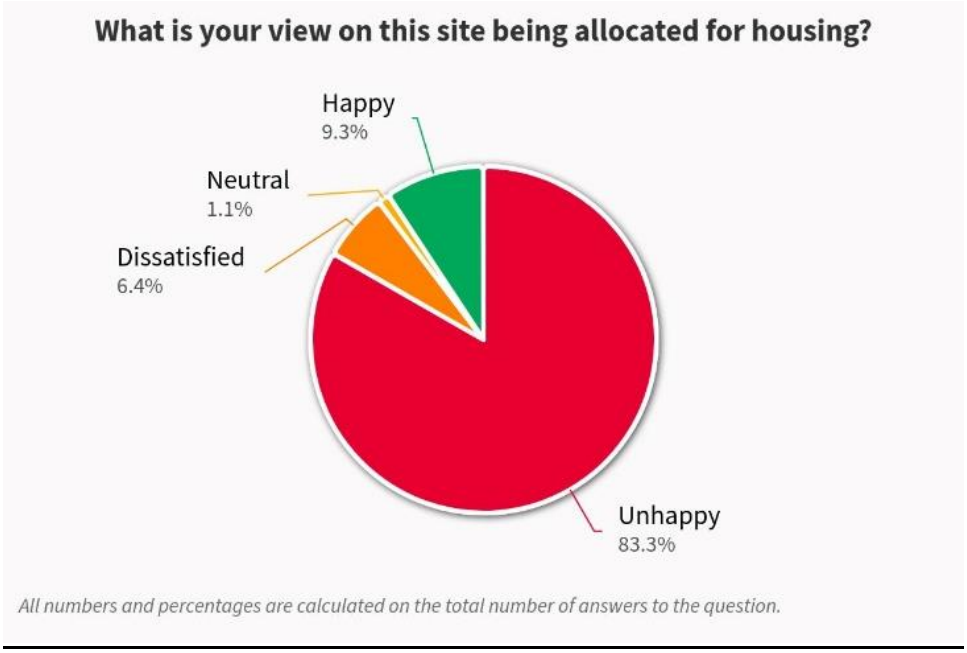
- Basildon
- London
- New Town.
- Brownfield land.
- Housing is not required
- Billericay
- Allocation H17
- A site with the capacity for associated infrastructure.

Actions and next steps

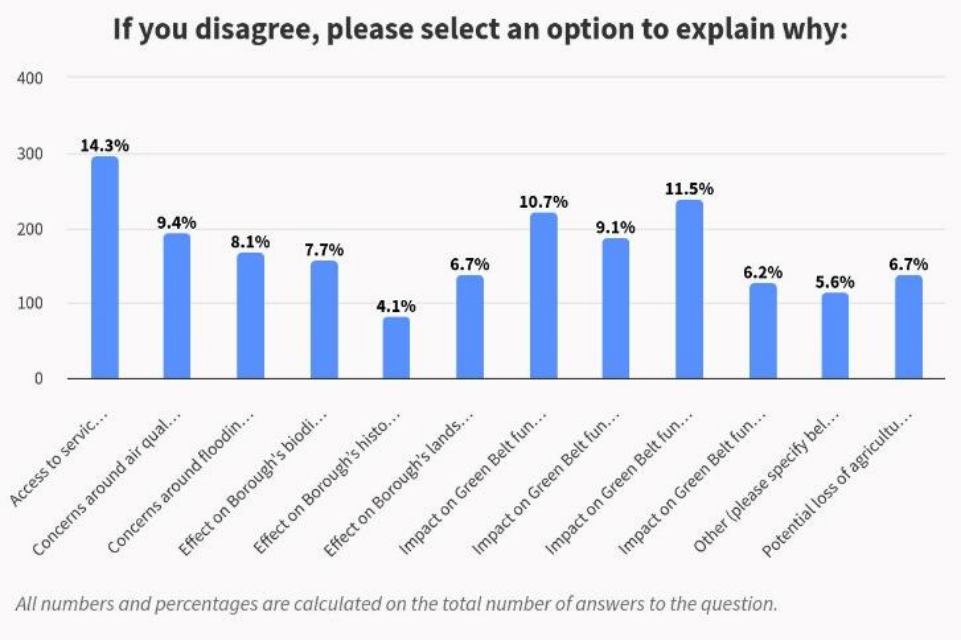
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H16 – Land West of Wick Country Park

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	**Basildon Council’s response**
Does not support proposed site allocation.	Objection noted.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commissioned a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern about urban sprawl.	
Concern around the merging of settlements.	
Opposition to development on agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.

Main comments	Basildon Council's response
Matter outside the scope of the Local Plan.	N/A to consultation.
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern around the sufficient provision of road infrastructure.	
Concern about air pollution from traffic.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Concern around road safety.	
Concern around the impact on open spaces and sport and recreation.	Policy relating to open space, sport and recreation is covered under the Regulation 18-part 2 consultation.
Growth should not be excessive.	National Policy sets out the minimum housing growth required in Basildon Borough over the Local Plan Period.
Concern around the impact of development on the historic character of the area.	The historic environment and potential impacts that development could have will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Concern about access.	Access to any site allocations will be reviewed as part of the site refinement

Main comments	Basildon Council's response
	exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.
Insufficient parking provision for growth.	The Council will consider setting out a Development Management Policy to address parking standards in the revised Local Plan.
Deliver housing on brownfield sites.	The Council has considered all opportunities to deliver housing in the urban area.
Drainage network needs improvements.	An additional Water Cycle Study is being undertaken for the Borough which will determine whether the existing water supply and wastewater infrastructure can accommodate the development over the plan period.
Further clarity needed on allocation H16 housing capacity.	Noted. The Council will continue to refine the strategic allocations, incorporating emerging additional evidence base work.
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Concern on the impact of development on the character of the area.	The impact of development on the character of an area will be considered at the planning application stage.
Support housing allocation H16.	Support noted.
Promoting land within a proposed housing allocation.	Land promotion noted.
Proposes the refinement of the allocation.	Noted.

We asked: Where do you think employment should be located instead? Comments are summarised as follows:

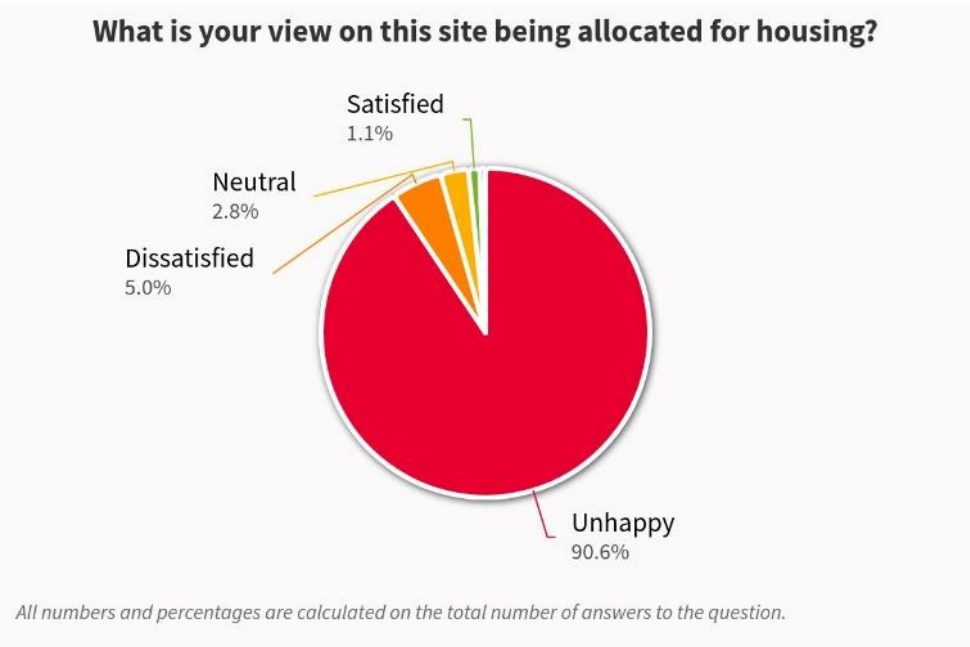
- Outside of the Borough
- Elsewhere in the Borough
- Brownfield, grey belt or previously developed land
- Not in the Green Belt
- New settlements such as new towns or garden villages.

Actions and next steps

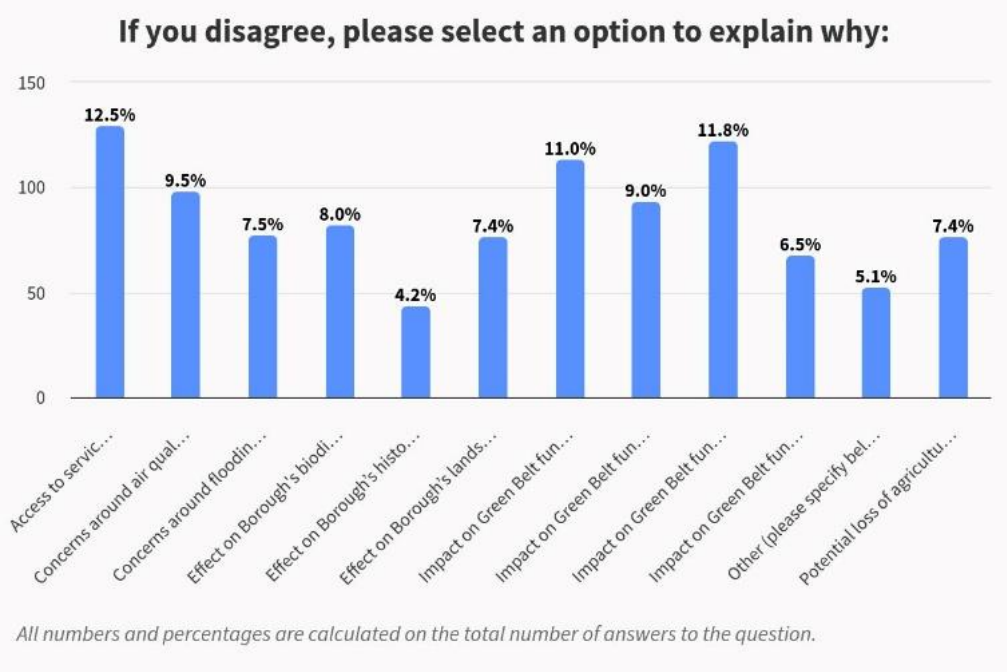
There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the strategic allocation's refinements incorporating emerging additional evidence base work.

H17 – Land East of Wick Country Park

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	Basildon Council’s response
Does not support proposed site allocation.	Objection noted.

Main comments	Basildon Council's response
Supportive of proposed site allocation.	Support noted.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commissioned a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Deliver housing on grey belt sites.	In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated. Basildon Council has commissioned a Grey Belt Study to inform the Local Plan.
Opposition to development on agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published

Main comments	Basildon Council's response
	for a Regulation 18 consultation in late 2025.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern around the sufficient provision of road infrastructure.	
Concern about air pollution from traffic.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Concern around road safety.	
Concern around the impact on open spaces and sport and recreation.	Policy relating to open space, sport and recreation is covered under the Regulation 18 part 2 consultation.
Growth should not be excessive.	National Policy sets out the minimum housing growth required in Basildon Borough over the Local Plan Period.
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Concern on the impact of development on the character of the area.	The impact of development on the character of an area will be considered at the planning application stage.
Supports allocation H17.	Support noted.
Promoting land within a proposed housing allocation.	Land promotion noted.
Promotes the refinement of the allocation H17 to include land for employment.	Noted.
Promoting land in an alternative location which has not been allocated in the draft Local Plan.	Land promotion noted.

We asked: Where do you think employment should be located instead? Comments are summarised as follows:

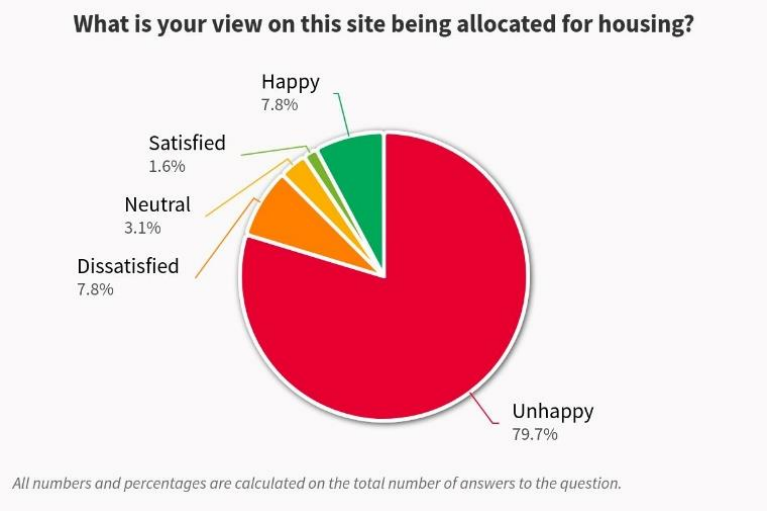
- Outside of the Borough.
- Elsewhere in the Borough.
- Brownfield, grey belt or previously developed land.
- Not in the Green Belt.
- New settlements such as new towns or garden villages.

Actions and next steps

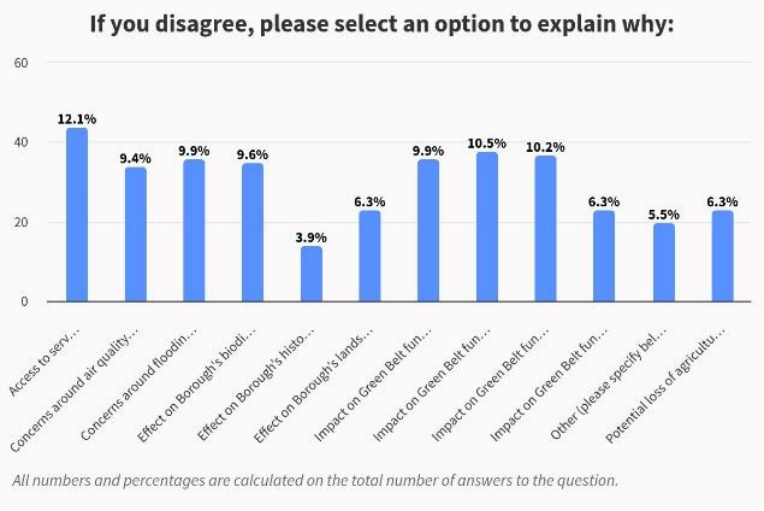
There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the strategic allocation's refinements incorporating emerging additional evidence base work.

H18 – Land North of Southend Road, Wickford

We asked:



We asked:



We asked:
If you selected "other" please specify.

The main comments raised were:

Main comments	Basildon Council's response
Does not support proposed site allocation.	Objection noted.
Preserve/protect Green Belt.	Basildon Council has prepared a Green

Main comments	Basildon Council's response
Concern about urban sprawl.	Belt Study and has commissioned a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern around the sufficient provision of road infrastructure.	
Public transport is limited in the area.	
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Concern how development in the area would impact the trainline.	Basildon Council has commissioned updated transport modelling which considers the impact of growth on public transport in the area. This will inform the development of the next iteration of the Local Plan and the Infrastructure Delivery Plan.

Main comments	Basildon Council's response
Deliver existing planning consents.	The housing supply includes all planning permissions which have not yet been delivered and all homes recorded as built on or after 1/4/2023.
No clear Comment on Policy / Local Plan	N/A Consultation.
Concern about access to the proposed site.	Access to any site allocations will be reviewed as part of the site refinement exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.
Prioritise education needs / facilities, including SEND provision	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Growth should not be excessive.	National Policy sets out the minimum housing growth required in Basildon Borough over the Local Plan Period.
Support housing allocation H18.	Support noted.
Promoting land within a proposed housing allocation.	Land promotion noted.

We asked: Where do you think employment should be located instead? Comments are summarised as follows:

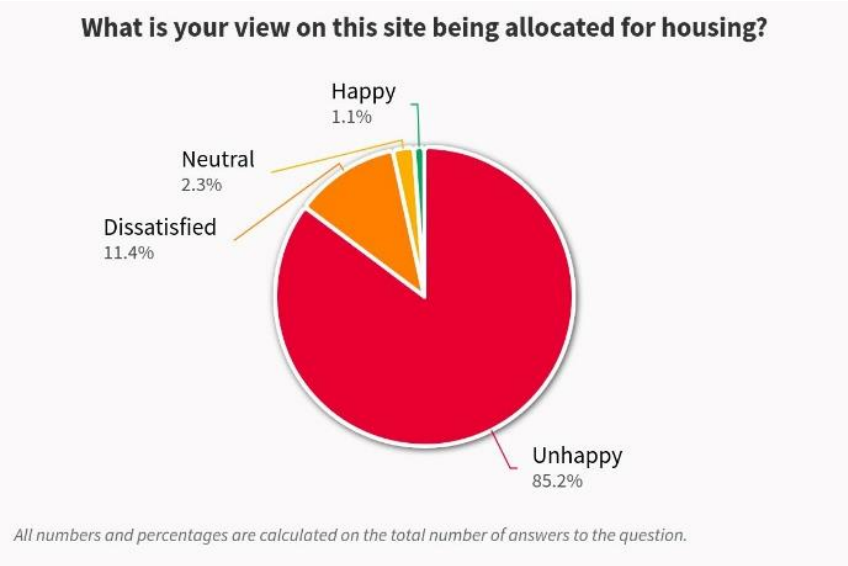
- Outside of the Borough.
- Elsewhere in the Borough.
- Brownfield, grey belt or previously developed land.
- Not in the Green Belt.
- Regenerate existing housing stock / rely on empty homes.
- New settlements such as new towns or garden villages.

Actions and next steps

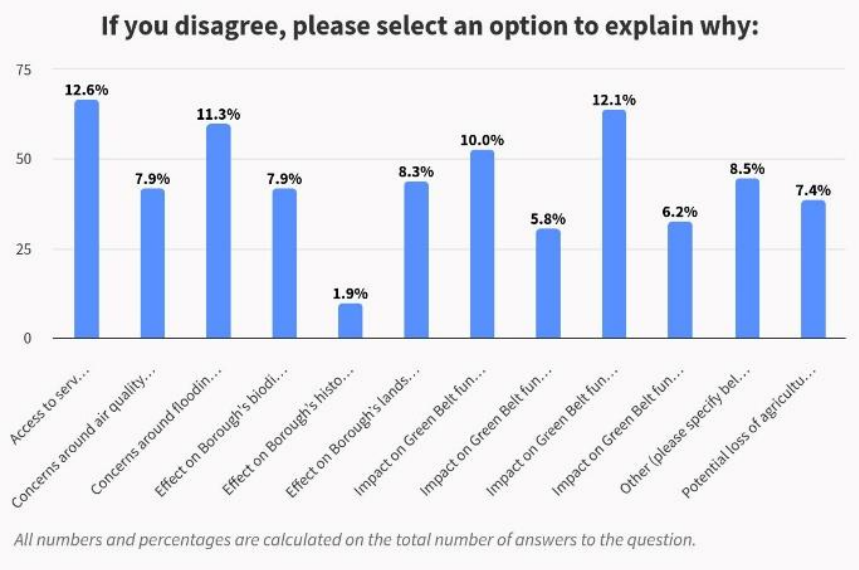
There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the strategic allocation's refinements incorporating emerging additional evidence base work.

H19 - Barn Hall, Wickford

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	Basildon Council’s response
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Preserve/protect the green spaces.	The Healthy Communities chapter sets out how public open spaces will

Main comments	Basildon Council's response
	preserve or replaced.
Concern around bridleway and footpath access.	Revised allocation policies will set out expectations for retain or replacement.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern about pollution.	This is addressed by Chapter 13.
Supportive of brownfield development before green belt release.	Support noted.
Concern of development impacts on biodiversity and habitats.	This is addressed by Chapter 11.
Concerns surrounding suitable transport infrastructure.	Transport capacity modelling has been commissioned.
Preserve/protect the Green belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concerns surrounding the loss of agricultural land.	Concerns surrounding the loss of agricultural land.
Landscapes should be enhanced and protected, with a visual landscape assessment conducted.	Additional evidence on visual impact has been commissioned.
Raises concern that residential development near ancient woodlands and SSSIs on the grounds of impact on wildlife specifically badgers.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Detailed support for delivering for housing from land promoter.	The supplied information will inform revision of the allocations.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

- Brownfield land

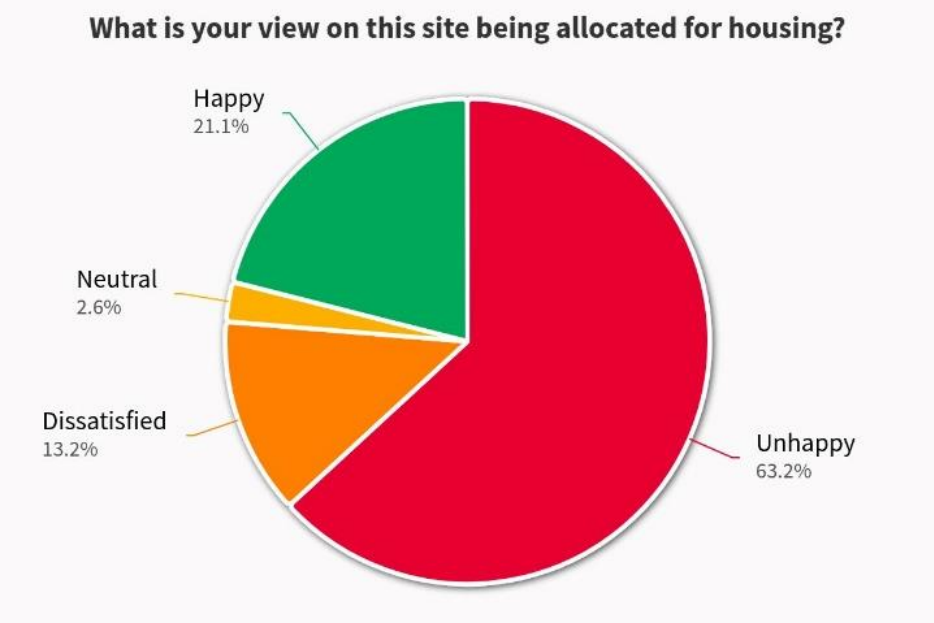
- Vange
- Basildon Town
- Billericay
- The Wick
- Basildon and Wickford town Centres
- Locations outside the borough

Actions and next steps

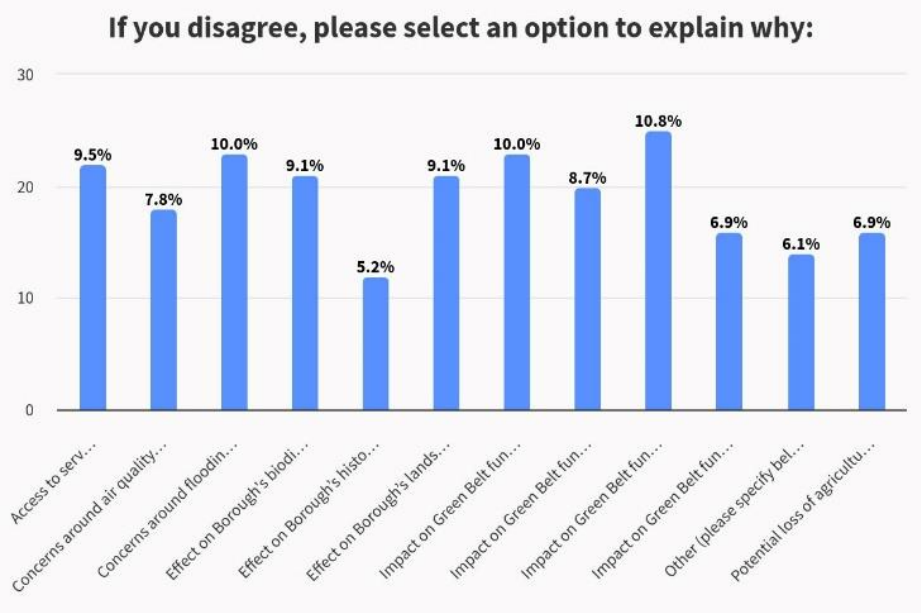
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H20 – Land North of London Road, Wickford

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	**Basildon Council’s response**
Development in this location would go against Green Belt policy.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt in order to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern about urban sprawl.	
Preserve/protect Green Belt.	
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Local plan should prioritise improving existing infrastructure.	
Does not support proposed site allocation.	Objection for site allocation noted.
Matters outside the scope of a local	N/A to consultation.

Main comments	Basildon Council's response
plan.	
Conflicts with several strategic objectives.	The consultation comments received allow the Council to continue to review and amend the strategic objectives accordingly.
Does not support level of housing growth proposed.	Objection noted. All strategic sites are undergoing further refinement following the Regulation 18 consultation and will be updated as further evidence base work is undertaken.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern around the sufficient provision of road infrastructure.	
Concern about impact on existing habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern of development impacts on biodiversity and habitats.	
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Concern about impact on the landscape.	The Council accepts that development is likely to result in some change to the landscape, but it does not consider all change to be negative or that all landscapes are unable to accommodate some change. Development, where sensitively designed to respond to its context, can enhance existing landscape character by reinforcing or framing valued features and restoring degraded elements of the landscape. The Council is undertaking Landscape and Visual Impact Assessments to assess the proposed sites for any potential significance to landscape change.
Cumulative impact of new developments needs to be considered rather than sites in isolation.	The Plan will be supported by an Infrastructure Delivery Plan and a Viability Assessment at Regulation 19 that will consider the cumulative requirements of the Plan on development in the Borough to ensure deliverability and viability.
Concern about air pollution from traffic.	Basildon Council has commissioned updated transport modelling which considers a range of factors including
Concern around road safety.	

Main comments	Basildon Council's response
	potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Ensure existing biodiversity value on sites is correctly assessed.	Noted, this will be required at planning application stage.
Appropriate BNG should be provided with development.	Providing a minimum of 10% BNG for eligible development is a national requirement.
Drainage network needs improvements.	An additional Water Cycle Study is being undertaken for the Borough which will determine whether the existing water supply and wastewater infrastructure can accommodate the development over the plan period.
Concern around flood risk.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
More needs to be done to consider and prevent flood risk.	
Loss of agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.

The main comments received from Developer, Agents and Landowners were:

Main comments	Basildon Council's response
Support for housing allocation H20.	Support noted.
Does not support housing allocation H20.	Objection for site allocation noted.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt in order to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special

	circumstances does not need to be demonstrated.
General comments about allocation H20.	Comments noted.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

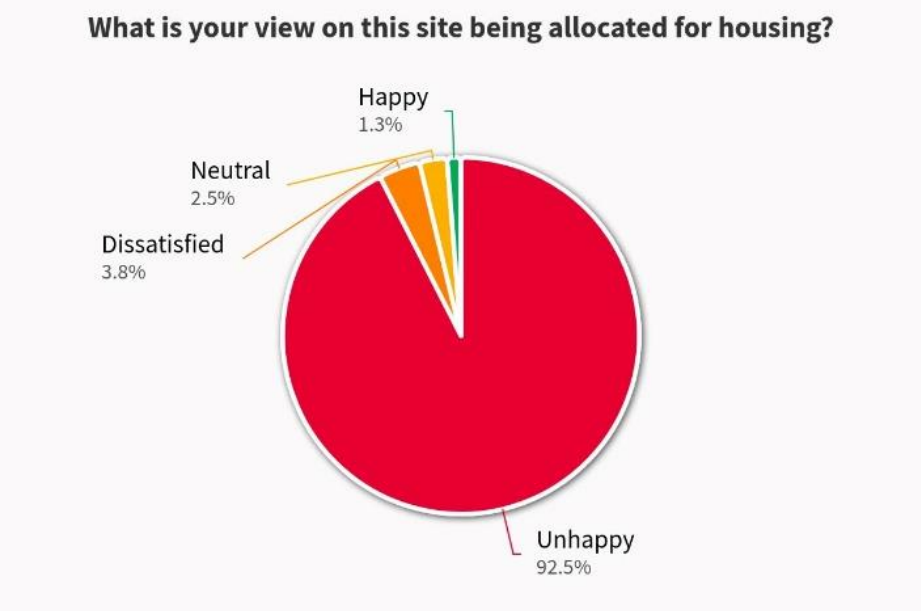
- Not in Basildon.
- Industrial sites.
- Not in the Green Belt.
- In Basildon.
- North Benfleet.
- Outside of Wickford.
- Brownfield land.
- Basildon Town Centre.
- Not on H20.
- Tilbury.

Actions and next steps

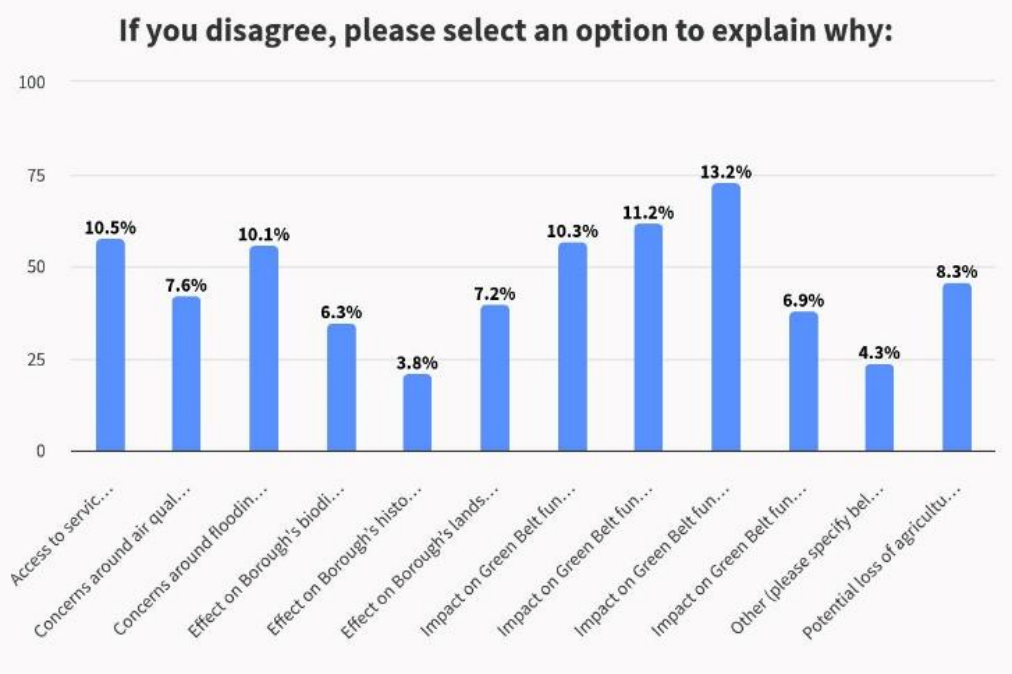
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H21 – Land South of London Road, Wickford

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	**Basildon Council’s response**
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Supportive of brownfield development.	Support noted.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release

Main comments	Basildon Council's response
	land from the Green Belt in order to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Opposition to development on agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.
Increase density of allocations.	Basildon Borough and considered potential to increase density in highly sustainable locations such as Basildon Town Centre.
Ensure existing biodiversity value on sites is correctly assessed.	Noted, this will be required at planning application stage.
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Concern about loss of green space.	The Council recognises the importance of all green spaces across the Borough, and the plan includes several policies which seek to ensure they are preserved and enhanced which were included in the Regulation 18-part 2 consultation.
Support for housing allocation H21.	Support noted.
Does not support housing allocation H21.	Objection for site allocation noted.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

- Not in Wickford
- Brownfield sites
- Grey belt

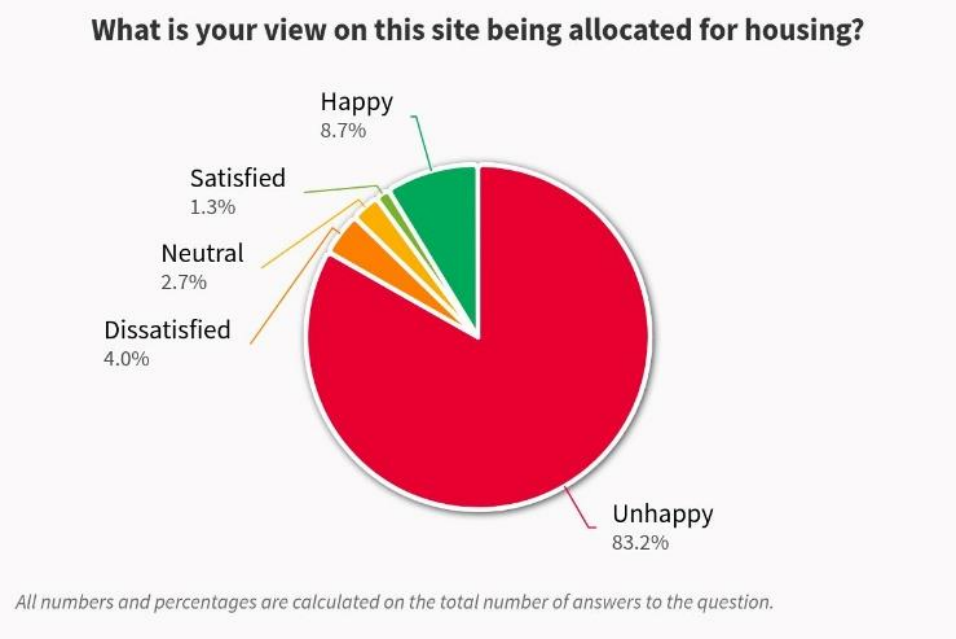
- North of A127
- H17
- Derelict land

Actions and next steps

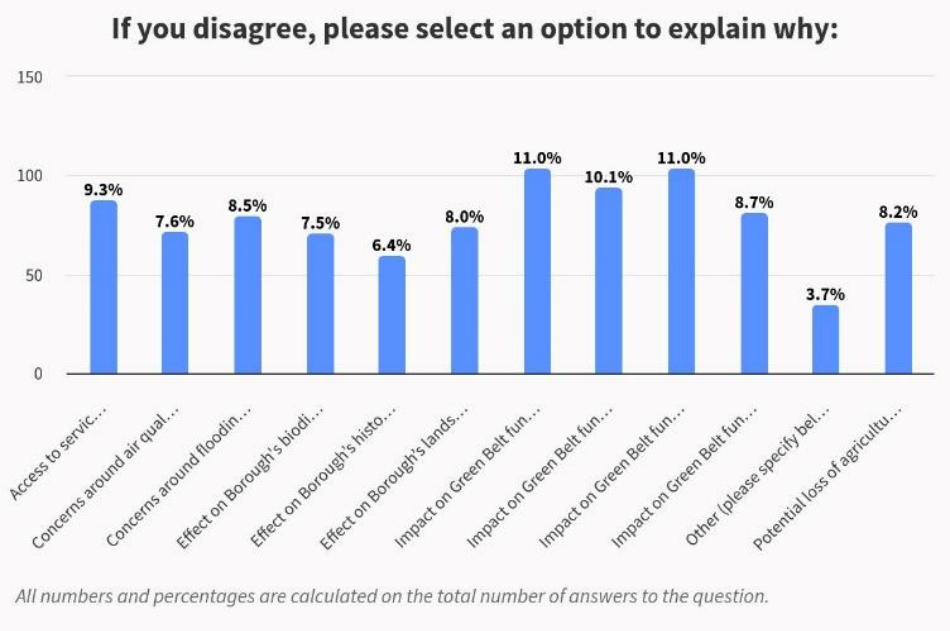
There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the strategic allocation's refinements incorporating emerging additional evidence base work.

H22 – Land North of Wash Road

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	**Basildon Council’s response**
Does not support proposed site allocation.	Objection noted.
Supportive of proposed site allocation.	Support noted.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commissioned a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern about urban sprawl.	
Concern around the merging of settlements.	
Concern around the classification of grey belt	
Opposition to development on agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.

Main comments	Basildon Council's response
No clear comment	N/A to consultation.
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern around the sufficient provision of road infrastructure.	
Concern about air pollution from traffic.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Concern around road safety.	
Support for improvements to active and sustainable travel.	Noted. The Infrastructure Delivery Plan will set out the necessary public transport improvements needed to support the growth proposed by the Local Plan.
Public transport is limited in the area.	
Concern around the impact on open spaces and sport and recreation.	Policy relating to open space, sport and recreation is covered under the Regulation 18 part 2 consultation.
Objection to Standard Method of calculating housing need	To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. Failure to do so

Main comments	Basildon Council's response
	would result in the plan being found unsound at examination with resultant reputational and financial risks to the Council.
Concern around the impact of development on the historic character of the area.	The historic environment and potential impacts that development could have will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Deliver housing on brownfield sites.	The Council has considered all opportunities to deliver housing in the urban area.
Deliver more social/affordable housing.	This is addressed by policy HOU2 – Affordable Housing.
Concern around the impact of development on the historic character of the area.	The historic environment and potential impacts that development could have will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Support housing allocation H22.	Support noted.
Promoting land within a proposed housing allocation.	Land promotion noted.
Promoting land in an alternative location which has not been allocated in the draft Local Plan.	Land promotion noted.

We asked: Where do you think employment should be located instead? Comments are summarised as follows:

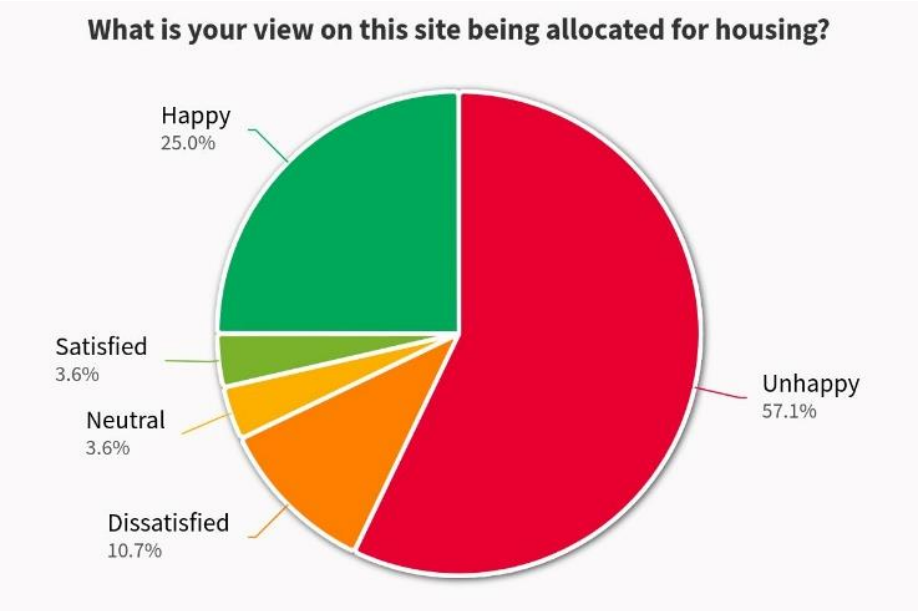
- Outside of the Borough.
- Elsewhere in the Borough.
- Brownfield, grey belt or previously developed land.
- Not in the Green Belt.
- Regenerate existing housing stock / rely on empty homes.
- New settlements such as new towns or garden villages.

Actions and next steps

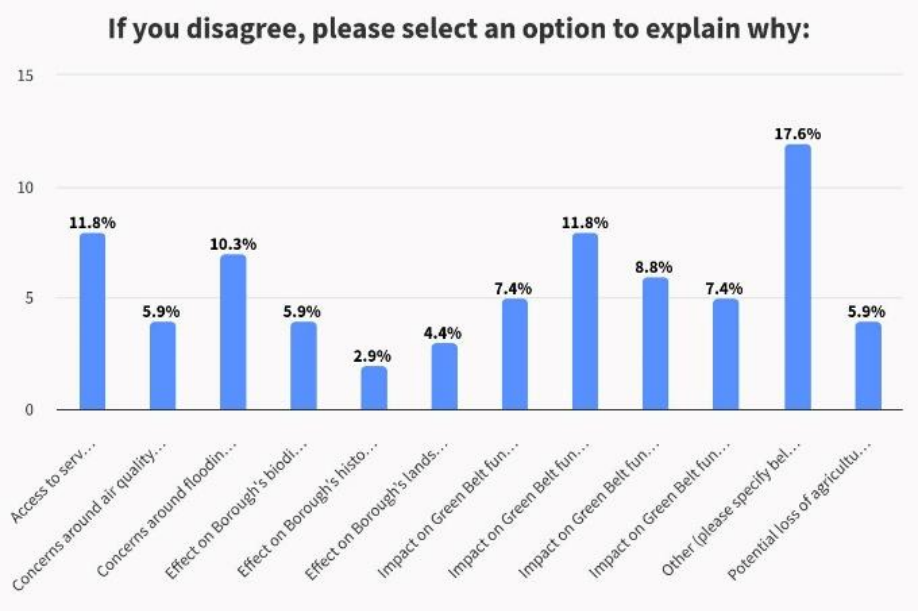
There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the strategic allocation's refinements incorporating emerging additional evidence base work.

H23 – Bowers Gifford Plotland

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	Basildon Council’s response
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Provide wider improvements to the transport network.	

Main comments	Basildon Council's response
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern about air pollution from traffic.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Concern about impact on existing habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern of development impacts on biodiversity and habitats.	
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Objection to the scale of growth proposed.	Noted. Basildon Council is required to deliver around 27,000 new homes over the period 2023-2043.
Matters outside the scope of the local plan.	N/A to consultation.
Support for housing allocation H23.	Support noted.
Does not support housing allocation H23.	Objection for site allocation noted.
Site location H23 does not contribute to the purposes of protecting the green belt in Basildon Council's evidence base.	Comment noted.
Contributes to the purposes of protecting the Green Belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt in order to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special
Preserve/protect Green Belt.	
Concern around the merging of settlements.	
Concern about urban sprawl.	

Main comments	Basildon Council's response
	circumstances does not need to be demonstrated.
Concern around historic flood risk in the area.	Noted. Policy CC6 Water efficiency and Sustainable Drainage Systems (SuDS) supports the use of SuDS where appropriate.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

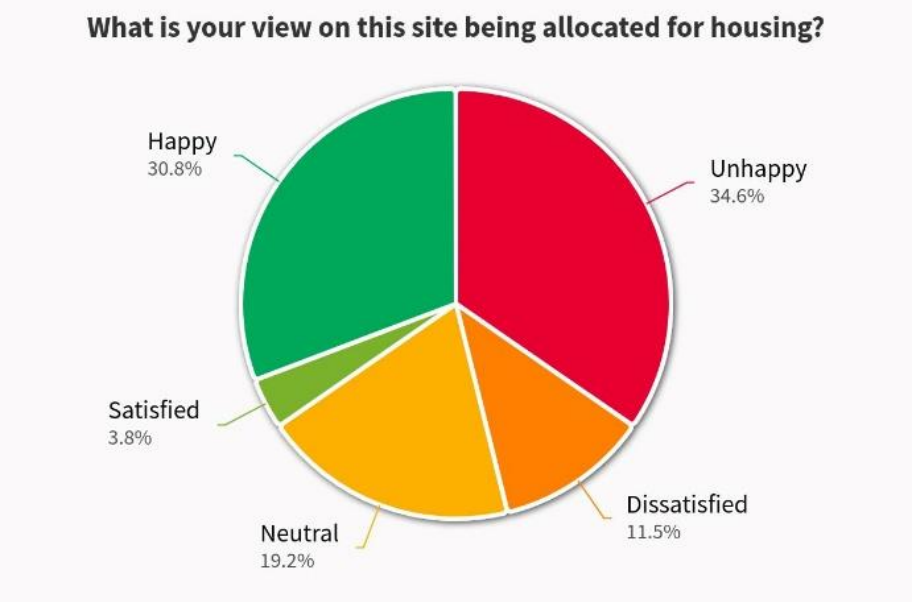
- Allocation AS3
- Parish Council Neighbourhood Development Order.

Actions and next steps

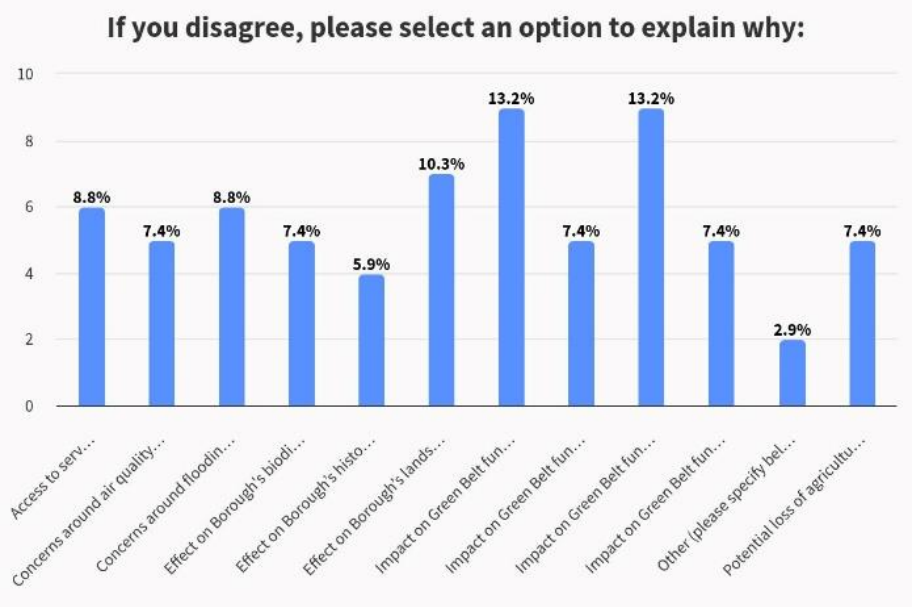
There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the strategic allocation's refinements incorporating emerging additional evidence base work.

H24 – Land north of Dry Street

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	**Basildon Council’s response**
Unclear why site allocation is proposed as it already has planning permission.	The site is included within the Local Plan as the plan period is proposed to run from 2023 – 2043 which would include the build out of this site.
Concern about risk of flooding from new development	Flood risk for this site was dealt with at the planning application stage.
Objects to development on site allocation H14.	Objection noted.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

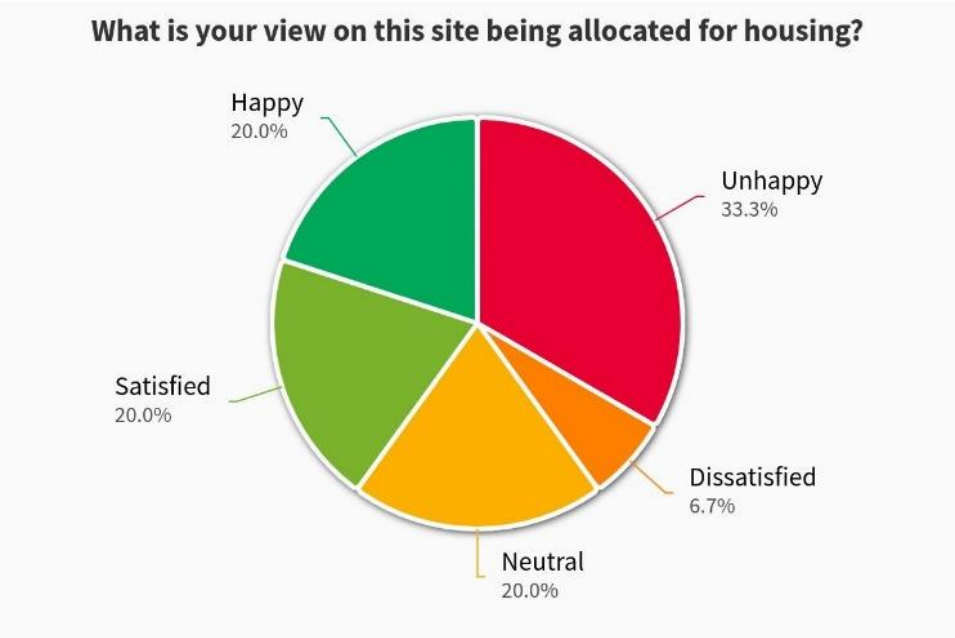
- Support site H24
- Brownfield land
- Not in Basildon.

Actions and next steps

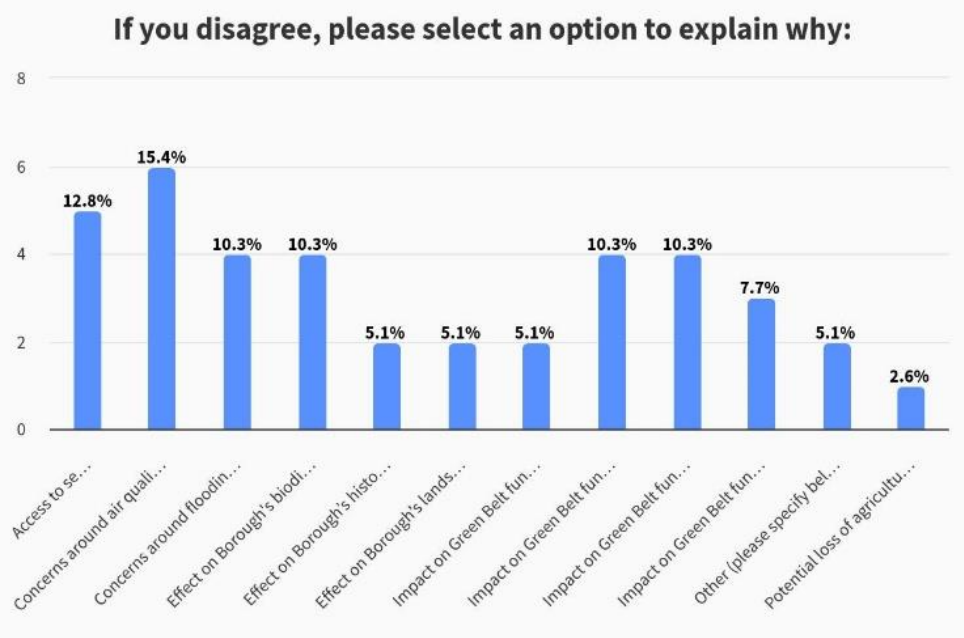
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H25 – Gardiners Lane South

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main issues raised were:

Main comments	Basildon Council’s response
Suggests provision of sports facilities and community hub.	Policy relating to sport and community facilities is covered under the Regulation 18-part 2 consultation.

Main comments	Basildon Council's response
Concern around loss of local sports facilities.	Comment noted. This would have been dealt with through the planning application process for this site.
Unclear why site allocation is proposed as it already has planning permission.	The site is included within the Local Plan as the plan period is proposed to run from 2023 – 2043 which would include the build out of this site.
Does not support proposed site allocation.	Objection noted.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Matters outside the scope of a local plan.	N/A to consultation.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

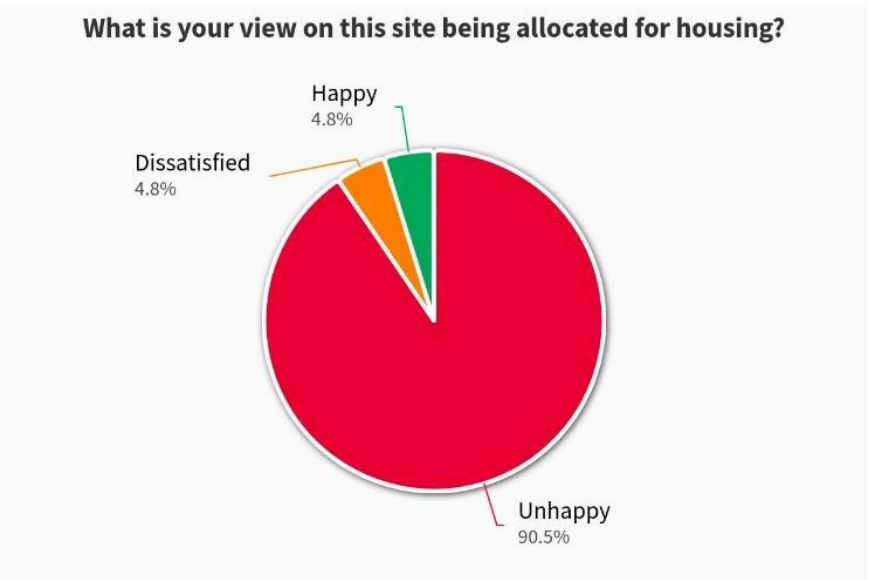
- Not sure
- Extend H25 to cover additional land

Actions and next steps

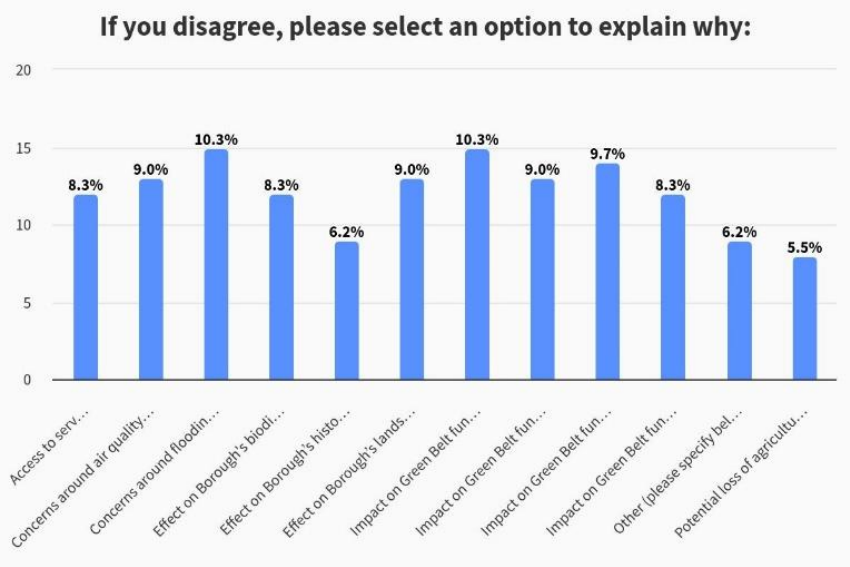
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H26 – Land South of Wash Road

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	Basildon Council’s response
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Existing road infrastructure requires improvements.	
Concern about increased traffic.	
Insufficient parking provision for growth.	The Council will consider setting out a

Main comments	Basildon Council's response
	Development Management Policy to address parking standards in the revised Local Plan.
Concern about air pollution from traffic.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Concern around the merging of settlements.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt in order to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Preserve/protect Green Belt.	
Concern about urban sprawl.	
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Ensure existing biodiversity value on sites is correctly assessed.	Noted, this will be required at planning application stage.
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Concern around the impact on the Local Nature Reserve.	Potential site constraints will be reviewed as part of the strategic site's refinement work currently being undertaken.
Promotes part of the site to extend the Local Nature Reserve to improve biodiversity and leisure access.	Comment noted.
Loss of agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy

Main comments	Basildon Council's response
	AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Local plan should prioritise improving existing infrastructure and providing future provision.	
Healthcare facilities need improvement.	
Insufficient primary school capacity.	
Concern on the impact of development on the character of the area.	The impact of development on the character of an area will be considered at the planning application stage.
Conflicts with strategic objective SO1: Protect and enhance the quality of the Local Environment.	The consultation comments received allow the Council to continue to review and amend the strategic objectives accordingly.
Growth should not be excessive.	National Policy sets out the minimum housing growth required in Basildon Borough over the Local Plan Period.
Unclear how the housing need has been identified.	As set out in policy SG1, the housing need was calculated using the standard method for calculating minimum housing need as required by the National Planning Policy Framework.
Concern around impacts to sports facilities and teams.	Policy relating to sport and community facilities is covered under the Regulation 18-part 2 consultation.
The local plan is difficult to understand.	Noted. Further amendments to the website will be made, including a Q&A section which will clarify what the Local Plan is, and answer common questions about its purpose.
Support for housing allocation H26.	Support noted.
Site allocation is Grey Belt land which does not significantly contribute to the core purposes of Green Belt policies.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt in order to meet the need for housing/employment land. In accordance with National

Main comments	Basildon Council's response
	Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

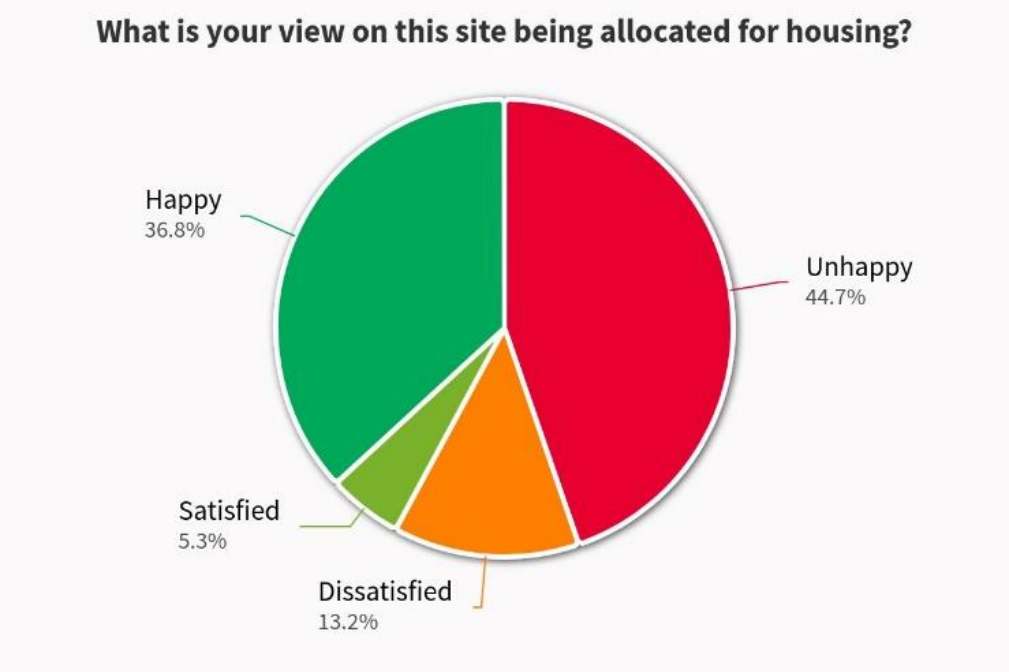
- Brownfield land.
- Industrial sites.
- Where there is good access to A roads.
- A new town.

Actions and next steps

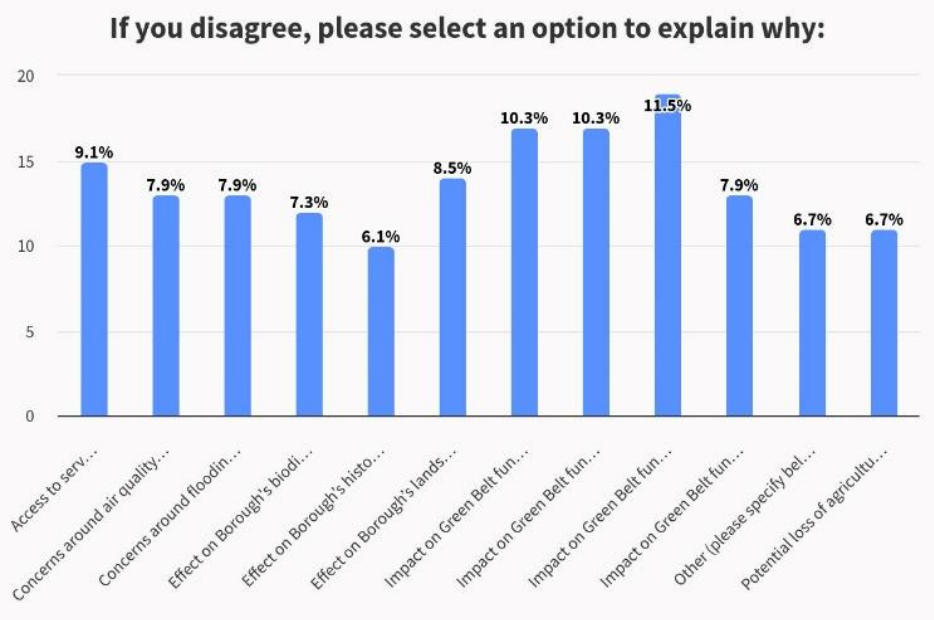
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H27 – Land south of Crays Hill

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	**Basildon Council’s response**
Support for housing allocation H27.	Support noted.
Concern around the impact on existing infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Does not support proposed site allocation.	Objection noted.
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Ensure existing biodiversity value on sites is correctly assessed.	Noted, this will be required at planning application stage.
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.

Main comments	Basildon Council's response
Land promotion within the H27 allocation.	Comment noted.
Concern about impact on existing development.	Matters relating to residential amenity are covered under Policy AQMP1: Mitigating Air Quality and Wider Environmental Pollution Issues.
Objection to scale of growth proposed.	Noted. Basildon Council is required to deliver around 27,000 new homes over the period 2023-2043.
Preservation of woodlands.	Comments noted. Policies NE1 and NE2 seek to preserve and enhance the natural environment and important habitats.
Concern around the merging of settlements.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Increase density of development.	Comment noted. The density for the site allocations will be reviewed as part of the site refinement exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.
Some housing could be delivered in this location.	Comment noted.
Does not support housing allocation H27.	Objection for site allocation noted.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

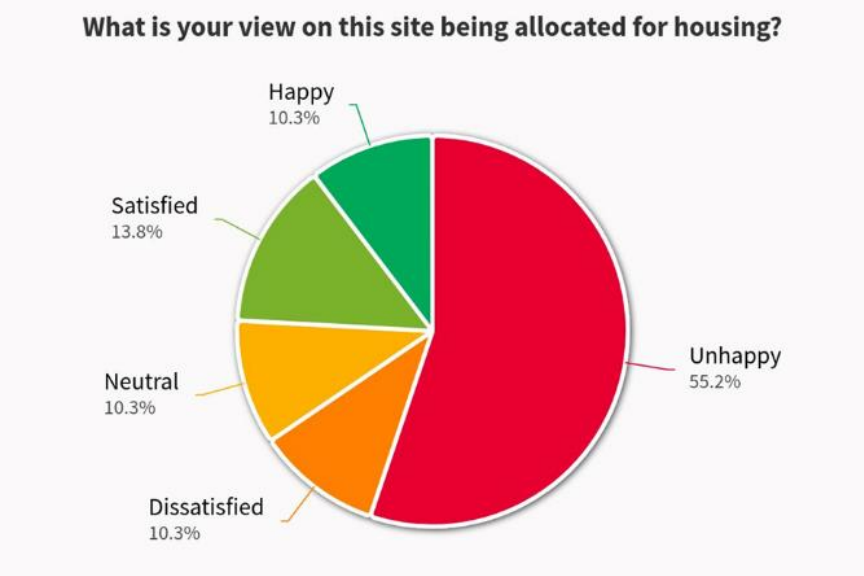
- Not on Green Belt or agricultural land
- A New Town
- Site AS3.

Actions and next steps

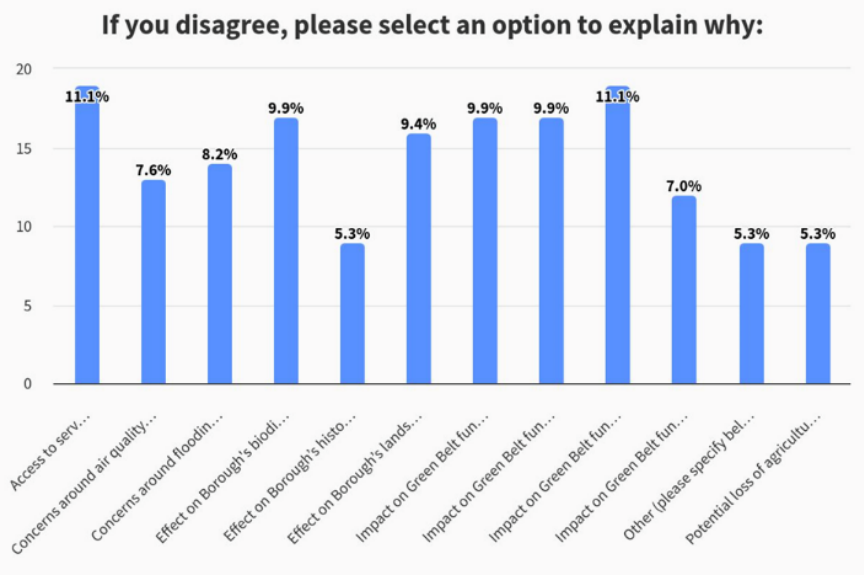
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

H28 – Land west of Castledon Road

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	Basildon Council's response
Support for housing allocation H28.	Support noted.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt in order to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern about urban sprawl.	
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Ensure existing biodiversity value on sites is correctly assessed.	Noted, this will be required at planning application stage.
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Does not support housing allocation H28.	Objection for site allocation noted.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

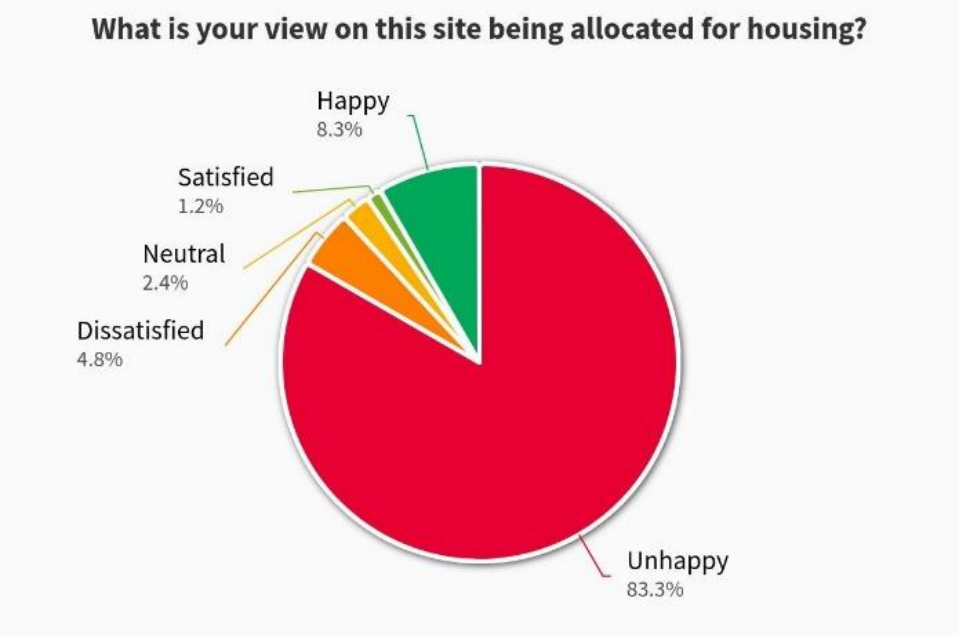
- Basildon Town Centre.
- Brownfield sites.
- Anywhere else.
- Create a New Town.
- Stafford.

Actions and next steps

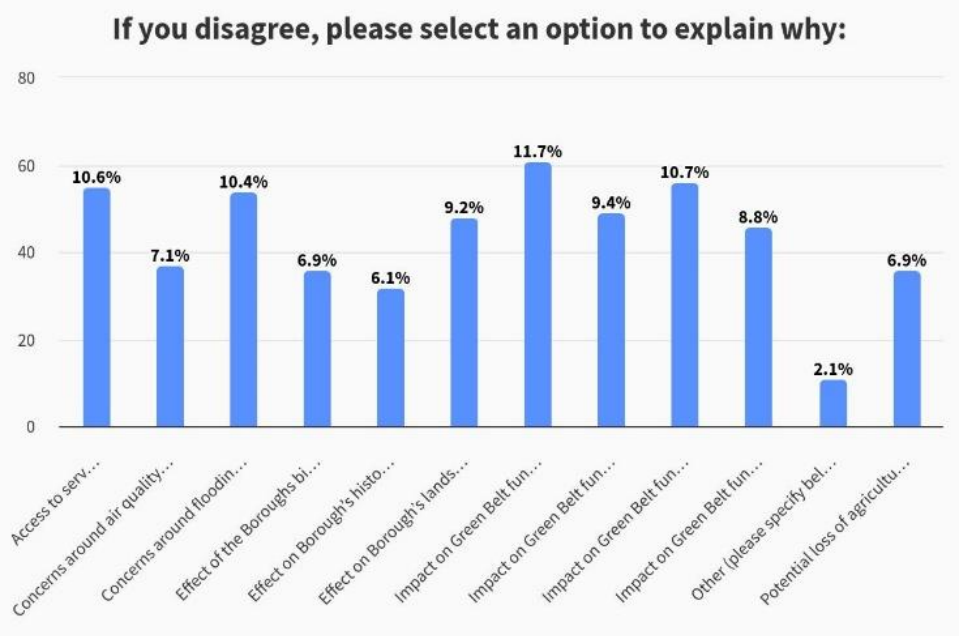
There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the strategic allocation's refinements incorporating emerging additional evidence base work.

H29 – Ramsden Bellhouse Neighbourhood Area

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	**Basildon Council’s response**
Concern about access.	Access to any site allocations will be reviewed as part of the site refinement exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.
Ramsden Bellhouse should be allocated a housing number of 39 as previously identified.	Evidence continues to identify a housing target of around 39 dwellings for Ramsden Bellhouse, this will be reflected in the Regulation 18-part 3 consultation.
Protect Green Belt except for limited infilling.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern around the merging of settlements.	
Preserve/protect Green Belt.	
Concern about encroachment.	
Objection to any backland development within the Green Belt.	
Does not support proposed site allocation.	Objection for site allocation noted.
Concern of the impact of new housing	Transport capacity modelling has been

Main comments	Basildon Council's response
development on the road network and traffic.	commissioned.
Public transport is limited in the area.	Noted. The Infrastructure Delivery Plan will set out the necessary public transport improvements needed to support the growth proposed by the Local Plan.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Preserve rural villages.	The Local Plan contains policies on design and preserving character. It also identifies strategic sites where housing growth will take place.
Existing infrastructure is limited and would not support additional dwellings.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern on the impact of development on the character of the area.	The impact of development on the character of an area will be considered at the planning application stage.
Concern about air pollution from traffic.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Opposition to development on agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a

Main comments	Basildon Council's response
	agricultural land may apply so it can be appropriately considered in the planning process.
Concern about loss of green space.	The Council recognises the importance of all green spaces across the Borough, and the plan includes several policies which seek to ensure they are preserved and enhanced which were included in the Regulation 18-part 2 consultation.
Additional housing is not required in this location.	Basildon Council is required to deliver around 27,000 new homes over the period 2023-2043.
Concern how development in the area would impact the trainline.	Basildon Council has commissioned updated transport modelling which considers the impact of growth on public transport in the area. This will inform the development of the next iteration of the Local Plan and the Infrastructure Delivery Plan.
Ensure existing biodiversity value on sites is correctly assessed.	Noted, this will be required at planning application stage.
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Concern about the impact on the landscape and views.	The Council accepts that development is likely to result in some change to the landscape, but it does not consider all change to be negative or that all landscapes are unable to accommodate some change. Development, where sensitively designed to respond to its context, can enhance existing landscape character by reinforcing or framing valued features and restoring degraded elements of the landscape. The Council is undertaking Landscape and Visual Impact Assessments to assess the proposed sites for any potential significance to landscape change.
Support for housing allocation H29.	Support noted.
Supportive of additional homes being provided in Ramsden Bellhouse allocation.	Support noted.
Promoting land in an alternative location which has not been allocated in the draft Local Plan.	Land promotion noted.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

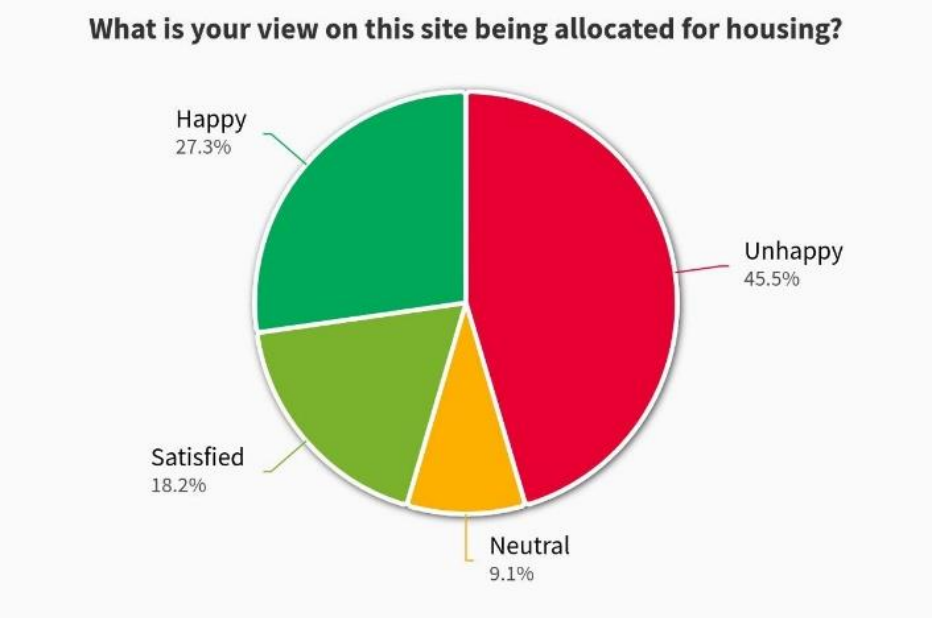
- Not sure
- Extend H25 to cover additional land

Actions and next steps

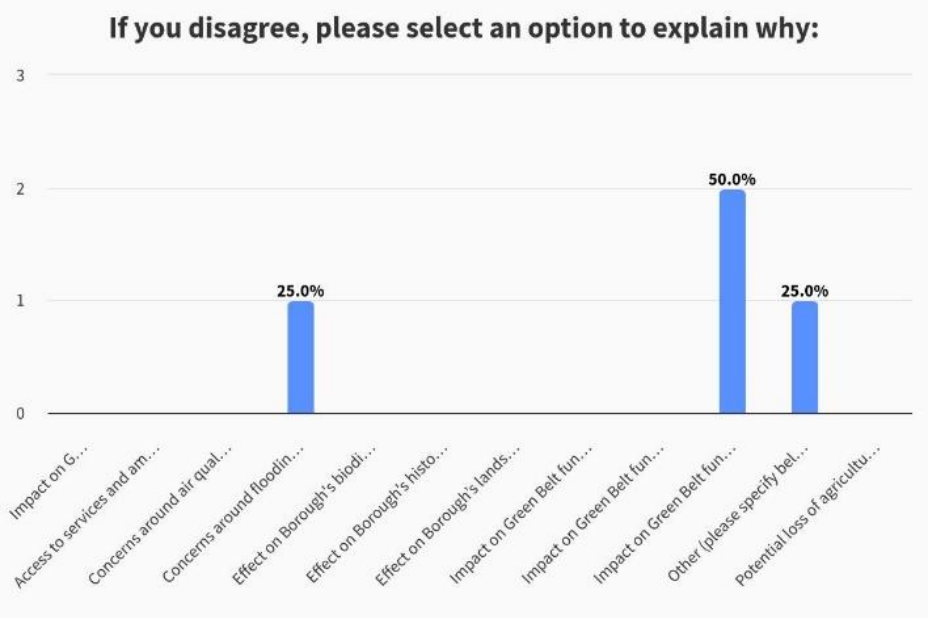
There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the strategic allocation's refinements incorporating emerging additional evidence base work.

E1 – Burnt Mills Extension

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	**Basildon Council’s response**
Concern about impact on existing habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Ensure existing biodiversity value on sites is correctly assessed.	
Essex Badger Protection group have provided guidance for mitigating impacts on sites where badger sets may exist.	Information noted.
Promotes the site for employment use	Support noted
Promotes the site for employment use	Support noted
Suggests that the site boundary is reviewed to ensure that the entire allocated site is suitable, achievable and deliverable within the Local Plan period.	All strategic sites are undergoing further refinement following the Regulation 18 consultation and will be updated as further evidence base work is undertaken.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

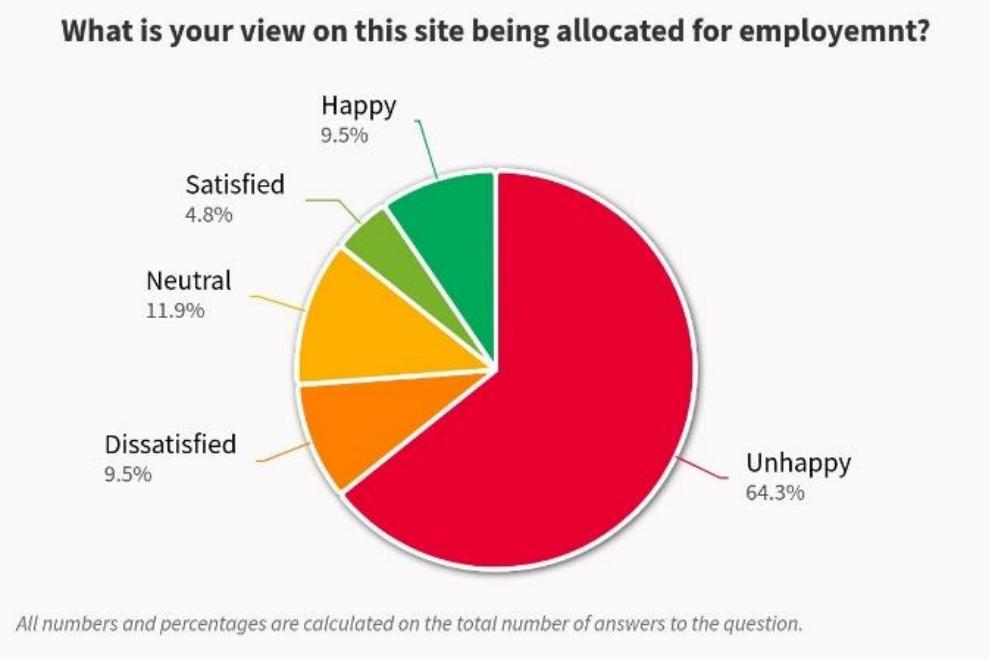
- Brownfield sites.
- Sustainable locations.
- Existing locations within and around Burnt Mills Industrial Estate (The Waste Management Service site).

Actions and next steps

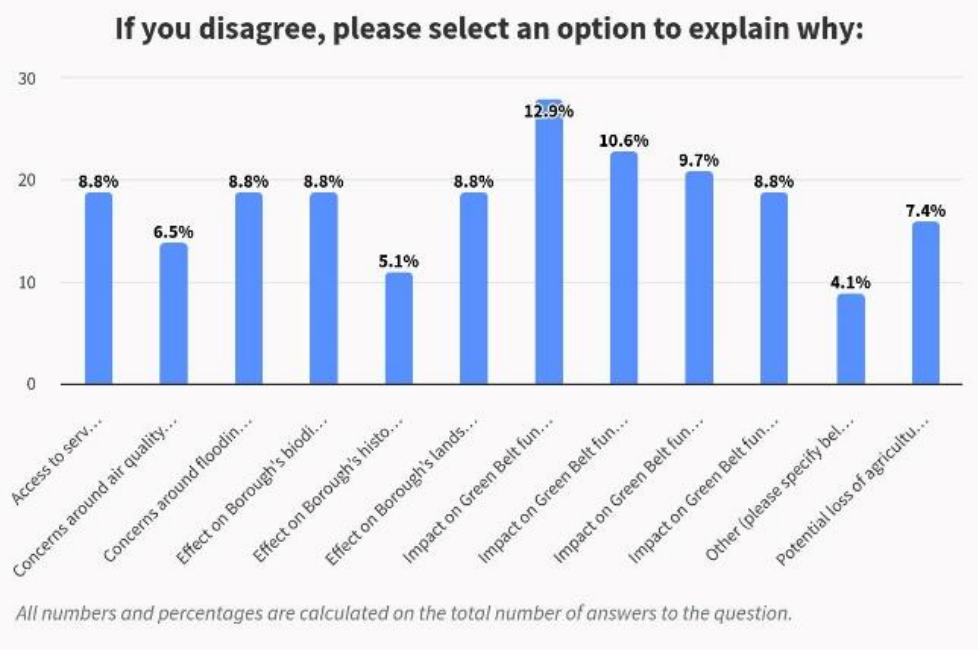
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

E2 – Dunton Bootsale

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	Basildon Council's response
Supportive of proposed site allocation.	Support noted.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commissioned a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt in order to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern about urban sprawl.	
Concern around the merging of settlements.	
Concern around encroachment	
Opposition to development on agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
More needs to be done to consider and prevent flood risk.	
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Local plan should prioritise improving existing infrastructure.	
Concern of the impact of new development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern around the sufficient provision	

Main comments	Basildon Council's response
of road infrastructure.	
Concern about air pollution from traffic.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Support for improvements to active and sustainable travel.	Noted. The Infrastructure Delivery Plan will set out the necessary public transport improvements needed to support the growth proposed by the Local Plan.
Concern around the impact on open spaces and sport and recreation.	Policy relating to open space, sport and recreation is covered under the Regulation 18-part 2 consultation.
Objection to Standard Method of calculating housing need	To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. Failure to do so would result in the plan being found unsound at examination with resultant reputational and financial risks to the Council.
Concern around the impact of development on the historic character of the area.	The historic environment and potential impacts that development could have will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Safeguard existing employment areas.	Policy E1 and E2 set out to protect and enhance existing employment areas.
Expand existing employment areas.	The Council notes the importance of delivering sufficient employment land. A review of draft employment allocations will be carried out over 2025.
Concern around the conversion of employment to residential use	This issue is covered by nationally applicable permitted development rights and does not require a local planning policy.
Concern around the loss of existing employment use at proposed allocation E2.	Policy E2 sets out to provide and retain Class E(g), B2 and B8 Use Classes or other 'sui generis' uses of a similar

Main comments	Basildon Council's response
	employment nature within new employment site allocations.
Further clarity needed on allocation E2.	Noted. The Council will continue to refine the strategic allocations, incorporating emerging additional evidence base work.
Promoting land in an alternative location which has not been allocated in the draft Local Plan.	Land promotion noted.
Promoting land within a proposed housing allocation.	Land promotion noted.

We asked: Where do you think employment should be located instead? Comments are summarised as follows:

- Outside of the Borough.
- Elsewhere in the Borough.
- Brownfield, grey belt or previously developed land.
- Not in the Green Belt.

Actions and next steps

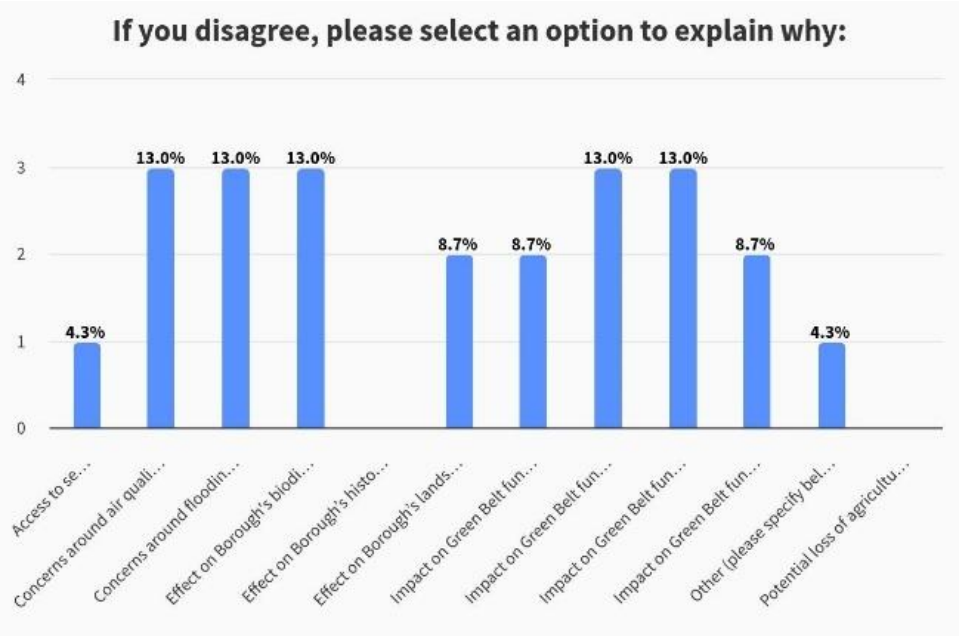
There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the strategic allocation's refinements incorporating emerging additional evidence base work.

E3 – Land adjacent to Hovefields Avenue

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main comments raised were:

Main comments	Basildon Council’s response
Concern about impact on existing habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six

Ensure existing biodiversity value on sites is correctly assessed.	expectations for new developments to protect and enhance the natural environment.
Concern around the impact on wildlife and/or the natural environment.	
Essex Badger Protection group have provided guidance for mitigating impacts on sites where badger sets may exist.	Information noted.
Objects to proposed allocation	Objection for site allocation noted.
Highlights risk of pluvial flooding	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Promotes the site for employment use	Support noted

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

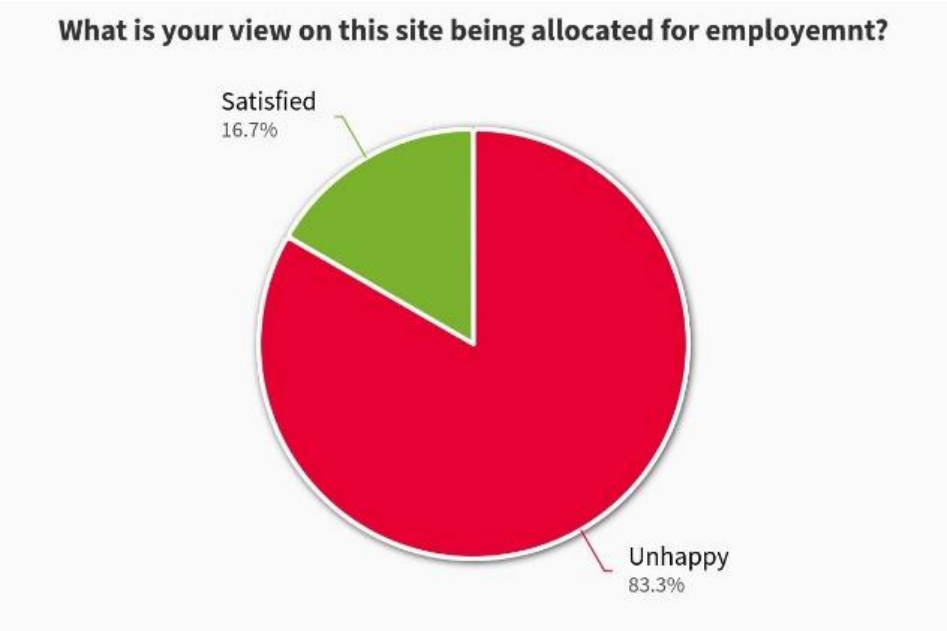
- Pitsea

Actions and next steps

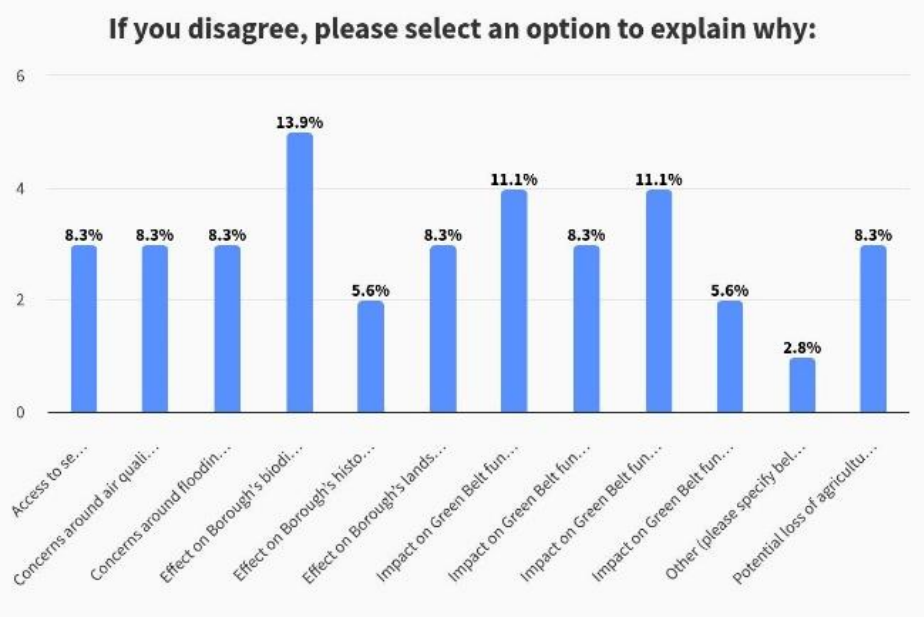
There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

E4 – Land West of Canvey Way

We asked:



We asked:



We asked:
If you selected “other” please specify.

The main issues raised were:

Main comments	Basildon Council’s response
Concern about impact on existing habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to
Ensure existing biodiversity value on sites is correctly assessed.	

Concern around the impact on wildlife and/or the natural environment.	protect and enhance the natural environment.
Essex Badger Protection group have provided guidance for mitigating impacts on sites where badger sets may exist.	Information noted.
Objects to proposed allocation	Objection for site allocation noted.

We asked: Where do you think housing should be located instead? Comments are summarised as follows:

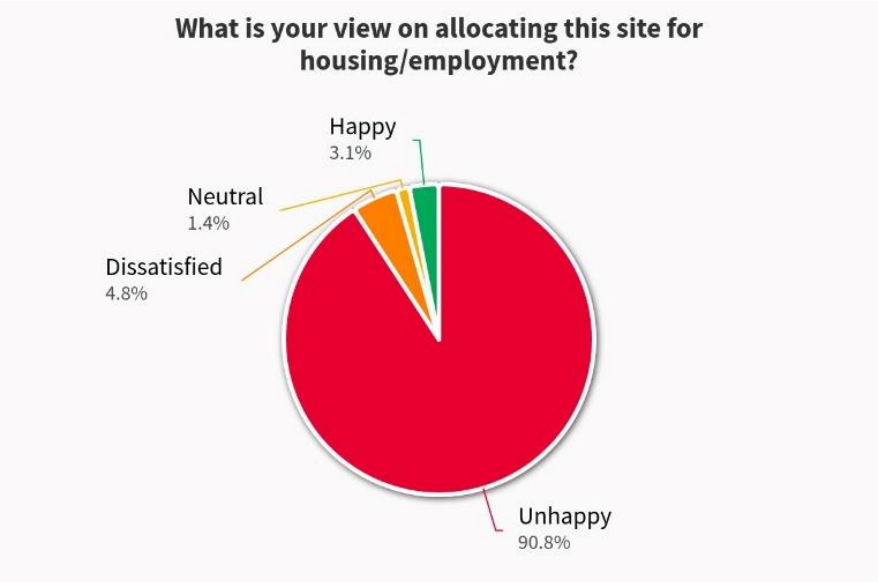
- Sustainable location

Actions and next steps

There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

AS1 – North Billericay, Queens Park

We asked:



We asked:
Please give the reasons for your view.

The main comments raised were:

Main comments	Basildon Council's response
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan.
Contributes to the purposes of protecting the Green Belt.	

Main comments	Basildon Council's response
Concern around the merging of settlements.	Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern about encroachment.	
Concern about urban sprawl.	
Supportive of proposed site allocation.	Support noted.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Development would have an impact on climate change.	The policies within the climate change chapter have been included to support the drive towards net zero development.
Proposed site allocation is not in a sustainable location.	All strategic sites are undergoing further refinement following the Regulation 18 consultation and will be updated as further evidence base work is undertaken.
Preserve open spaces.	Policy relating to open space is covered under the Regulation 18-part 2 consultation.
Concern about impact on existing habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Lack of local amenities.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published
Highlights importance of improving infrastructure.	

Main comments	Basildon Council's response
	for a Regulation 18 consultation in late 2025.
Opposition to development on agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.
Concern about impact on the landscape.	The Council accepts that development is likely to result in some change to the landscape, but it does not consider all change to be negative or that all landscapes are unable to accommodate some change. Development, where sensitively designed to respond to its context, can enhance existing landscape character by reinforcing or framing valued features and restoring degraded elements of the landscape. The Council is undertaking Landscape and Visual Impact Assessments to assess the proposed sites for any potential significance to landscape change.
Local plans should address the needs of protected species.	Comments noted. Policies NE1 and NE2 seek to preserve and enhance the natural environment and important habitats.
Ancient woodlands should be protected.	
Protect the Country Park.	
Concern how development in the area would impact the trainline.	Basildon Council has commissioned updated transport modelling which considers the impact of growth on public transport in the area. This will inform the development of the next iteration of the Local Plan and the Infrastructure Delivery Plan.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern about the impacts of development and loss of green spaces on health and wellbeing.	This is dealt with by national legislation for biodiversity net gain. If biodiversity is lost through development, it must be replaced along with an increase of at least 10%.
Development sites should not be cleared of trees.	
Concern around loss of existing sports pitches and facilities.	Policy relating to sport and community facilities is covered under the

Main comments	Basildon Council's response
	Regulation 18-part 2 consultation.
Concern around the impact of development on the historic character of the area.	The historic environment and potential impacts that development could have will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Concern on the impact of development on the character of the area.	The impact of development on the character of an area will be considered at the planning application stage.
Does not support proposed site allocation.	Objection noted. All strategic sites are undergoing further refinement following the Regulation 18 consultation and will be updated as further evidence base work is undertaken.
Concern around sufficient provision of employment opportunities	Provision for new employment floorspace will be made at levels recommended by the Employment Land Review.
Concern about pollution.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Concern around road safety.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at known accident sites. This will inform the development of the next iteration of the Local Plan.
Promoting Brownfield Development	Comment noted.
Insufficient parking provision for growth.	The Council will consider setting out a Development Management Policy to address parking standards in the revised Local Plan.
Objection to the scale of growth proposed.	Noted. Basildon Council is required to deliver around 27,000 new homes over the period 2023-2043.
Concern around loss of community facilities.	Policy relating to sport and community facilities is covered under the Regulation 18-part 2 consultation.
Support for creating New Towns.	Support noted.
The local plan is difficult to understand.	Noted. Further amendments to the website will be made, including a Q&A section which will clarify what the Local

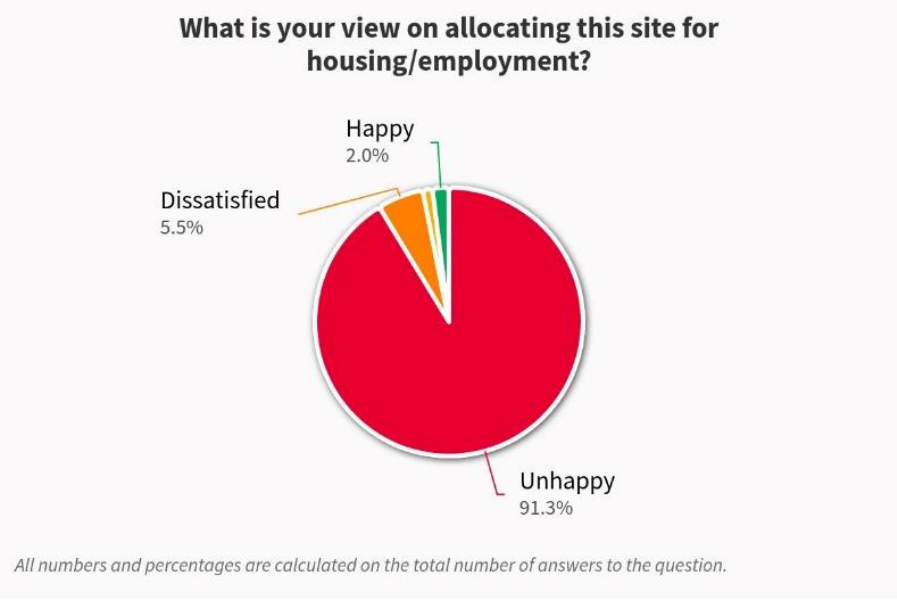
Main comments	Basildon Council's response
	Plan is, and answer common questions about its purpose.
Ensure existing biodiversity value on sites is correctly assessed.	Noted, this will be required at planning application stage.
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Matter outside the scope of a local plan.	N/A to consultation.
Deliver more social/affordable housing.	This is addressed by policy HOU2 – Affordable Housing.
Local plans should address the needs of protected species.	Comments noted. Policies NE1 and NE2 seek to preserve and enhance the natural environment and important habitats.
Concern around light and noise pollution.	This is addressed by policy AQMP1: Mitigating Air Quality and Wider Environmental Pollution Issues.
Public rights of way need protection.	Public Rights of Way are protected by law.

Actions and next steps

There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

AS2 – Potash Road

We asked:



We asked:
Please give the reasons for your view.

The main comments raised were:

Main comments	Basildon Council's response
Does not support proposed site allocation.	Objection noted.
Supportive of proposed site allocation.	Support noted.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commissioned a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern about urban sprawl.	
Concern around the merging of settlements.	
Concern around encroachment	
Concern around the classification of grey belt	
Opposition to development on agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.
No clear comment.	N/A to consultation.
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late

Main comments	Basildon Council's response
	2025.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern around the sufficient provision of road infrastructure.	
Concern about air pollution from traffic.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Concern around road safety.	
Support for improvements to active and sustainable travel.	Noted. The Infrastructure Delivery Plan will set out the necessary public transport improvements needed to support the growth proposed by the Local Plan.
Public transport is limited in the area.	
Concern around the impact on open spaces and sport and recreation.	Policy relating to open space, sport and recreation is covered under the Regulation 18-part 2 consultation.
Concern around sufficient provision of employment opportunities.	Provision for new employment floorspace will be made at levels recommended by the Employment Land Review.
Promotes the allocation for employment use	Promotion noted.
Objection to Standard Method of calculating housing need	To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. Failure to do so would result in the plan being found unsound at examination with resultant reputational and financial risks to the Council.
Growth should not be excessive.	National Policy sets out the minimum housing growth required in Basildon Borough over the Local Plan Period.
Concern around the impact of development on the historic character of the area.	The historic environment and potential impacts that development could have will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Concern about access.	Access to any site allocations will be reviewed as part of the site refinement

Main comments	Basildon Council's response
	exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.
Insufficient parking provision for growth.	The Council will consider setting out a Development Management Policy to address parking standards in the revised Local Plan.
Deliver housing on brownfield sites.	The Council has considered all opportunities to deliver housing in the urban area.
Support for new settlements such as new towns or garden villages.	Noted.
Deliver more social/affordable housing.	This is addressed by policy HOU2 – Affordable Housing.
Drainage network needs improvements.	An additional Water Cycle Study is being undertaken for the Borough which will determine whether the existing water supply and wastewater infrastructure can accommodate the development over the plan period.
Promotes a well-being policy	Policy HC1 sets out to promote strong, vibrant and healthy communities.
Support for delivering smaller properties/starter homes.	Policy HOU1 sets out to deliver a range of housing including smaller sized homes.
Support for flatted / higher density development.	Noted.
Concern around the impact of development on the historic character of the area.	The historic environment and potential impacts that development could have will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Concern around a major pipeline located at the site.	Any potential housing in this area will be required to be master planned to manage any constraints
Housing for residents.	The Local Plan sets out to deliver sufficient housing for future residents. However, it is not appropriate to limit this to the needs of current residents as it would not reflect the patterns of movement in and out of the borough, for example, relocation for employment purposes.
Deliver existing planning consents.	The housing supply includes all planning permissions which have not yet been delivered and all homes recorded as built on or after 1/4/2023.

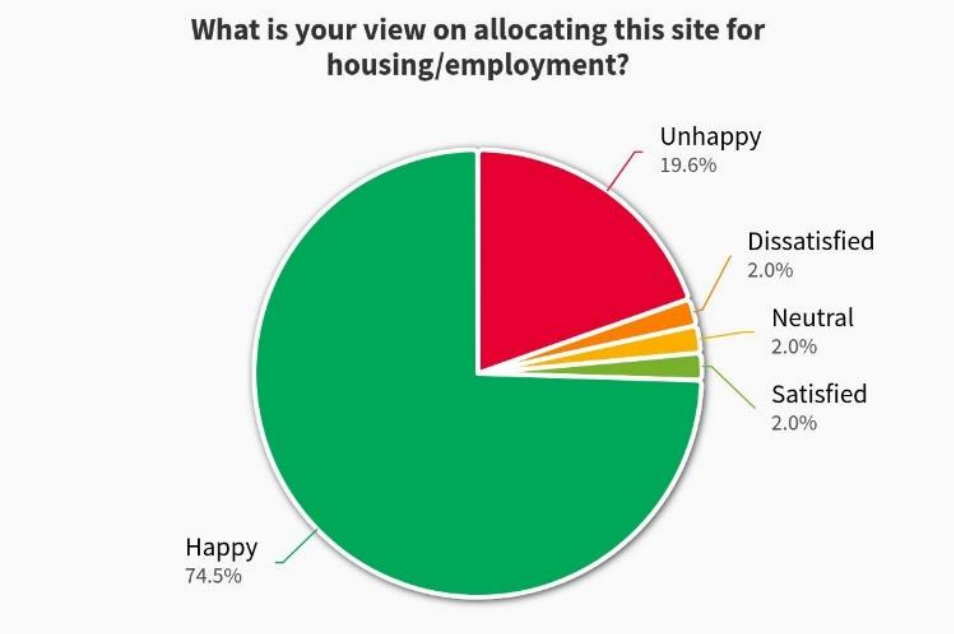
Main comments	Basildon Council's response
Concern about the impact on the landscape and views.	The Council accepts that development is likely to result in some change to the landscape, but it does not consider all change to be negative or that all landscapes are unable to accommodate some change. Development, where sensitively designed to respond to its context, can enhance existing landscape character by reinforcing or framing valued features and restoring degraded elements of the landscape. The Council is undertaking Landscape and Visual Impact Assessments to assess the proposed sites for any potential significance to landscape change.
Promoting land within a proposed housing allocation.	Land promotion noted.

Actions and next steps

There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the strategic allocation's refinements incorporating emerging additional evidence base work.

AS3 - Land East of Bowers Gifford

We asked:



We asked:

Please give the reasons for your view.

The main comments raised were:

Main comments	**Basildon Council's response**
Promotes Infill development.	Comment noted.
Promotes plotland development.	
Supportive of site AS3.	Support noted.
Supportive of Green Belt review and limited release, particularly for this site which would not result in coalescence and loss of identity.	Support noted.
Supportive of strategic allocation providing infrastructure to support wider plotland area.	Support noted.
Site was allocated in withdrawn plan and neighbourhood plan.	Support noted.
Does not support proposed site allocation.	Objection noted.
Concern about urban sprawl.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt in order to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Preserve/protect the Green Belt.	
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Highlights risk of flooding.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Outside scope of Local Plan (land banking).	N/A to consultation.
Loss of agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.

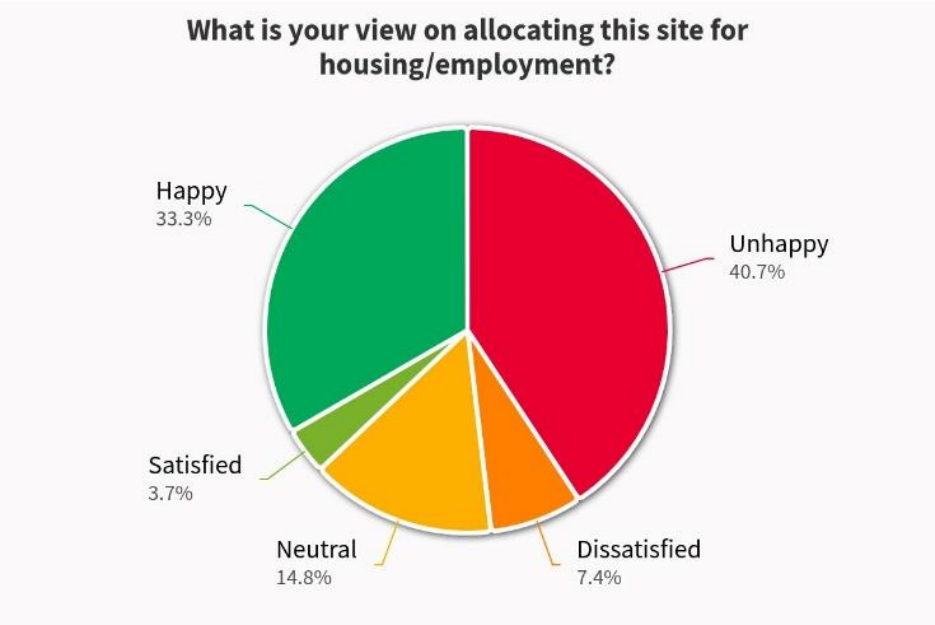
Main comments	Basildon Council's response
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Deliver more affordable housing.	Basildon Council notes these comments; we consider that affordable housing provision is reflected in Policy HOU2 Affordable Housing.
Suggests amending site boundary, to replace AS3 and AS4 into one site called North Benfleet.	All strategic sites are undergoing further refinement following the Regulation 18 consultation and will be updated as further evidence base work is undertaken.
Site promotion considers the site suitable for development	Support noted

Actions and next steps

There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

AS4 - Land South of A127

We asked:



We asked:
Please give the reasons for your view.

The main comments raised were:

Main comments	Basildon Council's response
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Contributes to the purposes of protecting the Green Belt.	
Supportive of proposed site allocation.	Support noted.
Concern about pollution.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Proposed site allocation is not in the most sustainable location.	All strategic sites are undergoing further refinement following the Regulation 18

Main comments	Basildon Council's response
	consultation and will be updated as further evidence base work is undertaken.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Development would have an impact on climate change.	The policies within the climate change chapter have been included to support the drive towards net zero development.
Preserve open spaces.	Policy relating to open space is covered under the Regulation 18-part 2 consultation.
Concern about impact on existing habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Lack of local amenities.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
More detail required on infrastructure delivery for the site.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Preserve rural villages.	The Local Plan contains policies on design and preserving character. It also identifies strategic sites where housing growth will take place.
Impact of Biodiversity Net Gain policy on developments.	National legislation has introduced the legal requirement to provide a minimum of 10% biodiversity net gain on eligible development sites.
Opposition to development on agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4

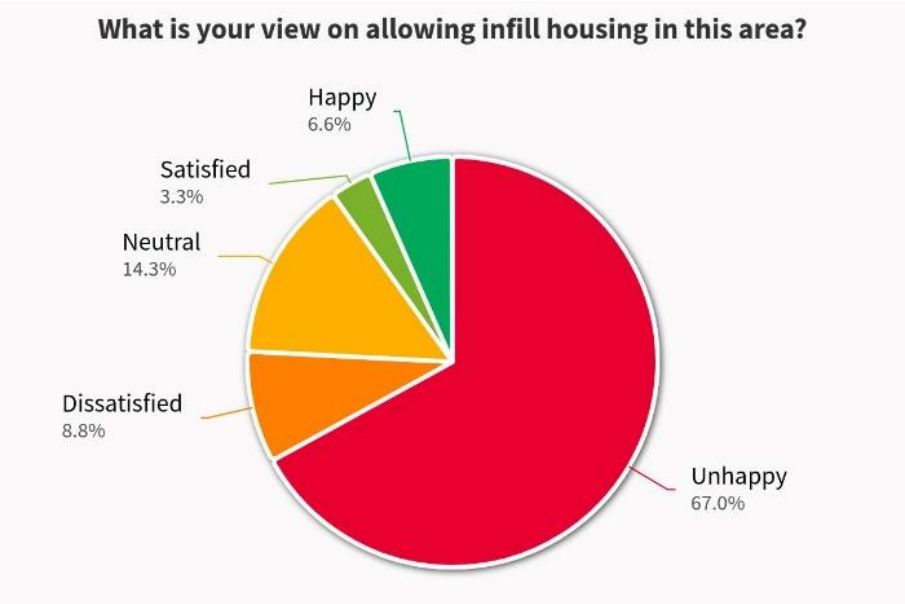
Main comments	Basildon Council's response
	(poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.
Concern about impact on the landscape.	The Council accepts that development is likely to result in some change to the landscape, but it does not consider all change to be negative or that all landscapes are unable to accommodate some change. Development, where sensitively designed to respond to its context, can enhance existing landscape character by reinforcing or framing valued features and restoring degraded elements of the landscape. The Council is undertaking Landscape and Visual Impact Assessments to assess the proposed sites for any potential significance to landscape change.

Actions and next steps

There are no actions to note arising from the responses received for this site allocation. The next steps are to continue with the strategic allocation refinements, incorporating emerging additional evidence base work.

IF1 - Break Egg Hill, Billericay

We asked:



We asked:
Please give the reasons for your view.

The main comments raised were:

Main comments	Basildon Council's response
Plotland areas are suitable for self-build opportunities.	Support noted.
Generally supportive of infilling of plotland areas.	
Supportive of brownfield development.	
Concern of development impacts on biodiversity, habitats, SSSIs and ancient woodlands.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Neither supportive nor unsupportive of proposal.	Noted.
Comment unclear.	N/A.
Does not support proposed infill site allocation.	Objection noted.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable.

Main comments	Basildon Council's response
	The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Queries the strength of the policy requirements.	Noted. The policies will be reviewed, and if required amended, following updated evidence base and comments received as part of the Regulation 18 consultation.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Need to meet housing needs.	This is addressed in the chapter 'Meeting our Growth Needs'.
Concern about air pollution from traffic.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Concern around loss of local sports facilities.	Policy relating to sport and community facilities is covered under the Regulation 18-part 2 consultation.
Ensure existing biodiversity value on sites is correctly assessed.	Noted, this will be required at planning application stage.
Guidance provided for mitigating impacts on sites where badger setts may exist.	Information noted.
Outside scope of the question.	N/A to consultation.
Concern of development impacting an historical and archaeological feature.	Policy HE4 requires an appropriate desk-based archaeological assessment and, where necessary, a field evaluation where heritage assets of archaeological interest of any significance are or may be present on the site of a proposed development, or are likely to be affected by the proposed development. This assessment will form part of the

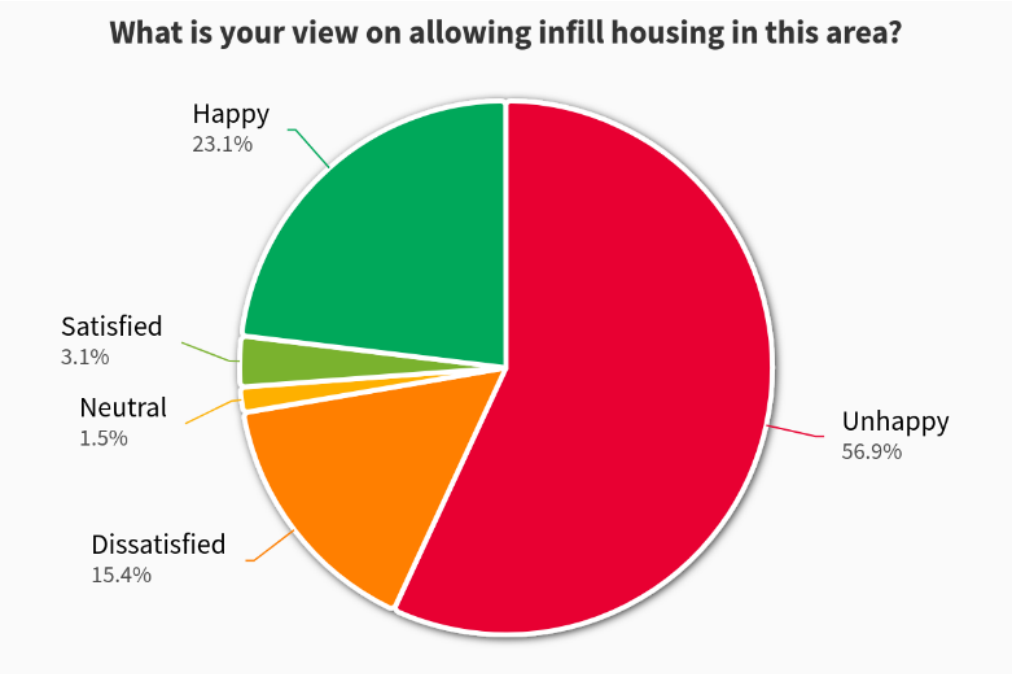
Main comments	Basildon Council's response
	planning application.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern about access.	Access to any site allocations will be reviewed as part of the site refinement exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.
Concern on the impact of development on the character of the area.	The impact of development on the character of an area will be considered at the planning application stage.
Deliver more social/affordable housing.	This is addressed by policy HOU2 – Affordable Housing.
Loss of agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.

Actions and next steps

There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the allocation refinements incorporating emerging additional evidence base work.

IF2 – Green Lane, Little Burstead

We asked:



We asked:
Please give the reasons for your view.

The main comments raised were:

Main comments	Basildon Council's response
Does not support proposed site allocation.	Objection noted.
Supportive of proposed site allocation.	Support noted.
Generally supportive of infilling of plotland areas.	Support noted.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commissioned a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Concern about urban sprawl.	
Opposition to development on agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy

Main comments	Basildon Council's response
	AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.
Matters outside the scope of a local plan.	N/A to consultation.
No clear comment	
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
More needs to be done to consider and prevent flood risk.	
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Local plan should prioritise improving existing infrastructure.	
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern around the sufficient provision of road infrastructure.	
Concern about air pollution from traffic.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.
Support for improvements to active and sustainable travel.	Noted. The Infrastructure Delivery Plan will set out the necessary public transport improvements needed to support the growth proposed by the Local Plan.
Public transport is limited in the area.	
Concern around the impact on open	Policy relating to open space, sport and

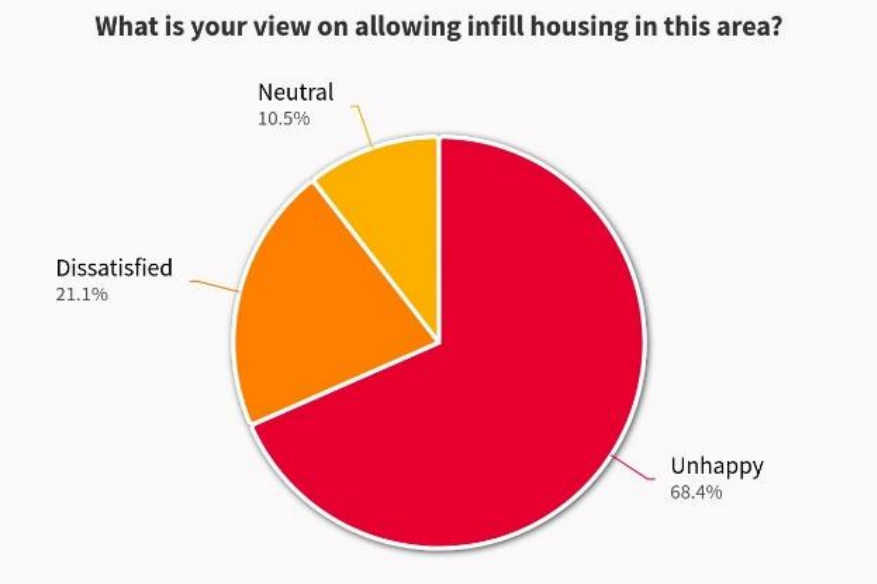
Main comments	Basildon Council's response
spaces and sport and recreation.	recreation is covered under the Regulation 18-part 2 consultation.
Concern around the conversion of employment to residential use.	Noted. However, this issue is covered by a permitted development right introduced by the Government.
Concern around sufficient provision of employment opportunities.	Provision for new employment floorspace will be made at levels recommended by the Employment Land Review.
Objection to Standard Method of calculating housing need.	To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. Failure to do so would result in the plan being found unsound at examination with resultant reputational and financial risks to the Council.
Growth should not be excessive.	National Policy sets out the minimum housing growth required in Basildon Borough over the Local Plan Period.
Plotland areas are suitable for self-build opportunities.	Noted. The Council is preparing evidence on the feasibility of delivering small sites in the plotland areas.
Concern around the impact of development on the historic character of the area.	The historic environment and potential impacts that development could have will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Perception that Green Lane Plotland forms part of Little Burstead Village.	As shown in the Plotlands Study, the Green Lane Plotland lies between the north-western edge of Basildon (Steeple View) to the south and the village of Little Burstead to the north. It is not considered part of Little Burstead village and was classified as a separate 'unserviced settlement' in the Initial Settlement Hierarchy (2024).
Concern about access.	Access to any site allocations will be reviewed as part of the site refinement exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.

Actions and next steps

There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the strategic allocation's refinements incorporating emerging additional evidence base work.

IF3 – Broomhills Chase, Little Burstead

We asked:



We asked:
Please give the reasons for your view.

The main comments raised were:

Main comments	Basildon Council's response
Concern around the impact of development on the historic character of the area.	The historic environment and potential impacts that development could have will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Supportive of brownfield development.	Support noted.

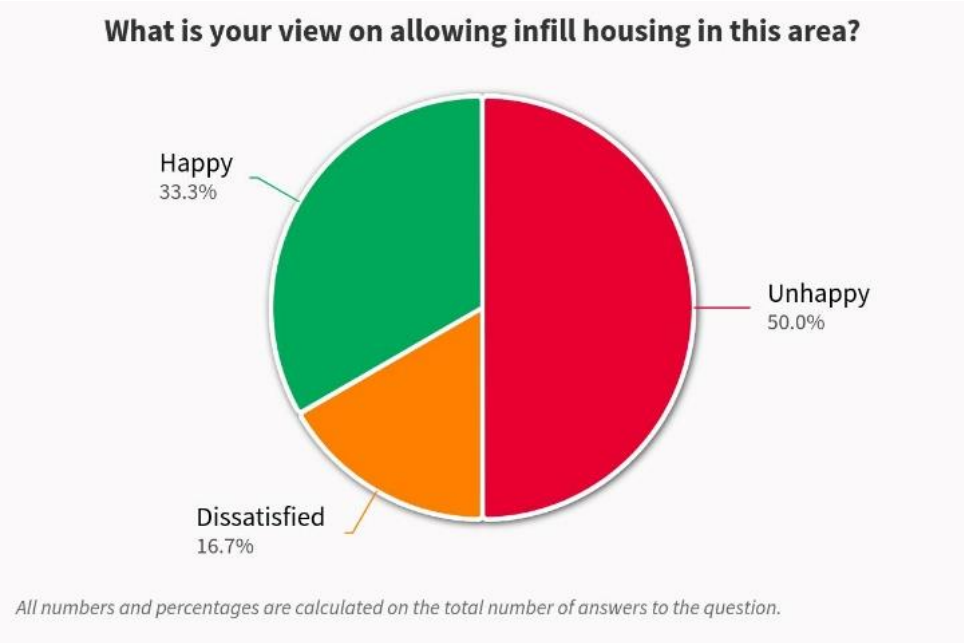
Main comments	Basildon Council's response
Concern of development impacts on biodiversity, habitats, SSSIs and ancient woodlands.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Does not support proposed infill site allocation.	Objection noted.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt in order to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Further detail required on the proposed growth.	A further Regulation 18 consultation will be held in late 2025.
Neither supportive nor unsupportive of proposal.	Noted.
Outside scope of the question.	N/A to consultation.
Deliver more social/affordable housing.	This is addressed by policy HOU2 – Affordable Housing.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern on the impact of development on the character of the area.	The impact of development on the character of an area will be considered at the planning application stage.

Actions and next steps

There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the allocation refinements incorporating emerging additional evidence base work.

IF4 – Fobbing

We asked:



We asked:
Please give the reasons for your view:

Main issues	Basildon Council's response
Does not support proposed site allocation.	Objection noted.
Supportive of proposed site allocation.	Support noted.
Promoting Plotland/Infill Development.	Support noted.
Deliver housing on grey belt sites	In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated. Basildon Council has commissioned a Grey Belt Study to inform the Local Plan.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern around the sufficient provision of road infrastructure.	
Concern about air pollution from traffic.	Basildon Council has commissioned updated transport modelling which considers a range of factors including potential to increase traffic at area where increased air pollution has been measured. This will inform the development of the next iteration of the Local Plan.

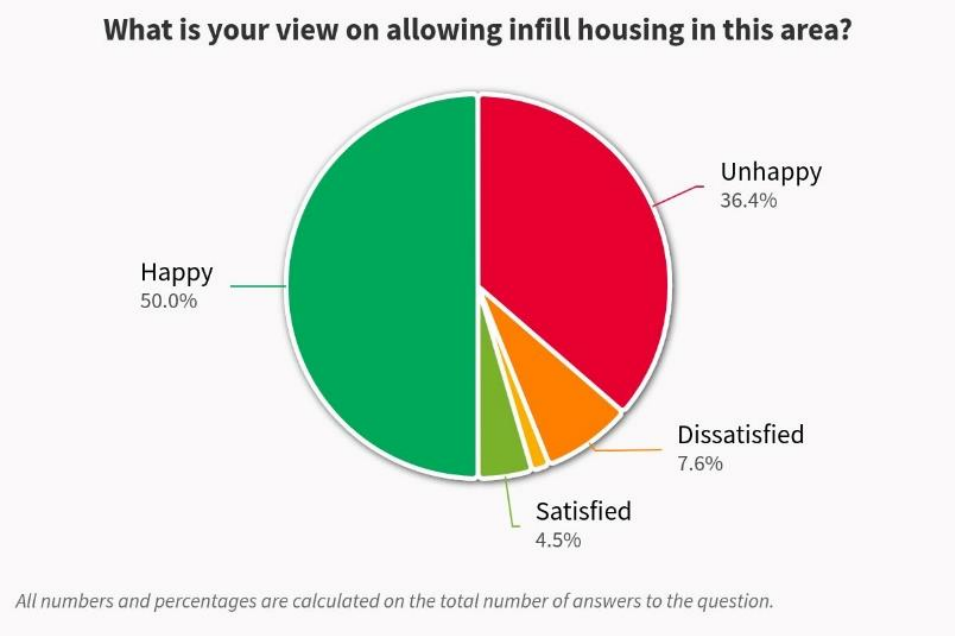
Main issues	Basildon Council's response
Growth should not be excessive.	National Policy sets out the minimum housing growth required in Basildon Borough over the Local Plan Period.
Deliver more social/affordable housing.	This is addressed by policy HOU2 – Affordable Housing.

Actions and next steps

There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the allocation refinements incorporating emerging additional evidence base work.

IF5 – Northlands, Langdon Hills

We asked:



We asked:
Please give the reasons for your view.

The main comments raised were:

Main comments	Basildon Council's response
Does not support proposed site allocation.	Objection noted.
Supportive of proposed site allocation.	Support noted.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commissioned a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to

Main comments	Basildon Council's response
	release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Opposition to development on agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.
Concern of development impacts on biodiversity and habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Concern about risk of flooding from new development.	Sequential tests and a Level 2 Strategic Flood Risk Assessment is being undertaken alongside the evolving Local Plan and their findings will feed into the site allocations.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern of the impact of new housing development on the road network and traffic.	Transport capacity modelling has been commissioned.
Concern around the sufficient provision of road infrastructure.	
Concern around road safety.	
Concern around the impact on open spaces and sport and recreation.	Policy relating to open space, sport and recreation is covered under the Regulation 18-part 2 consultation.
Concern around the impact of development on the historic character of	The historic environment and potential impacts that development could have

Main comments	Basildon Council's response
the area.	will be considered through the emerging evidence base which includes heritage impact assessments for the strategic sites.
Insufficient parking provision for growth.	The Council will consider setting out a Development Management Policy to address parking standards in the revised Local Plan.
Deliver housing on brownfield sites.	The Council has considered all opportunities to deliver housing in the urban area.
Deliver more social/affordable housing.	This is addressed by policy HOU2 – Affordable Housing.
Drainage network needs improvements.	An additional Water Cycle Study is being undertaken for the Borough which will determine whether the existing water supply and wastewater infrastructure can accommodate the development over the plan period.
Concern on the impact of development on the character of the area.	The impact of development on the character of an area will be considered at the planning application stage.
Housing for residents.	The Local Plan sets out to deliver sufficient housing for future residents. However, it is not appropriate to limit this to the needs of current residents as it would not reflect the patterns of movement in and out of the borough, for example, relocation for employment purposes.
Growth should not be excessive.	National Policy sets out the minimum housing growth required in Basildon Borough over the Local Plan Period.
Require bungalows.	The Council has commissioned updated evidence on housing need for specialist and supported accommodation. This will inform revision to the policy. Generally, the Council will seek to avoid low density housing. The NPPF states that it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.
Plotland areas are suitable for self-build opportunities.	Noted. The Council is preparing evidence on the feasibility of delivering small sites in the plotland areas.
No clear Comment on Policy / Local Plan	N/A Consultation.

Actions and next steps

There are no actions to note arising from the responses received for this site allocation. Next steps are continued with the strategic allocation's refinements incorporating emerging additional evidence base work.

3. Draft Local Plan Consultation 18.2 (Regulation 18)

3.1 Basildon Council held a second round of consultation for the Draft Local Plan. The 6-week consultation launched on Monday 24th February to Monday 14th April 2025, providing new and updated policies to be read in conjunction with all previous consultation stages, alongside the Basildon Town Centre Masterplan.

3.2 The Noak Bridge Neighbourhood Plan consultation launched on Monday 24th February to Monday 7th April 2025 on the consultation platform Commonplace.

Summary of Consultation Undertaken

3.3 The new and updated policies are as follows:

- Chapter: Ensuring the vitality of town centres.
  - R1 - Development in Basildon Town Centre (Update).
- Chapter: Healthy Communities.
  - HC1 – Health and Well-being Strategy (New).
  - HC2 – Open Spaces, Local Green Spaces, Sport and Recreation (New).
  - HC3 - Strategic Approach to Education, Skills and Learning (New).
- Chapter: Meeting our housing needs
  - HOU2 - Affordable Housing (Update).
  - HOU4 – Gypsy and Traveller Accommodation (New).
  - HOU5 - Travelling Show people Accommodation (New).
- Basildon Town Centre Masterplan
  - Part 1 - Understanding the Context
  - Part 2 - Vision and Policies
  - Part 3 - Character Area Guidance and Implementation

Preparation for the Consultation

3.4 Prior to the consultation the Council sent around 20,000 letters, emails and notifications via the consultation portal Commonplace to advise of the second round Draft Local Plan consultation. Notice was provided to all interested persons and bodies (as addressed in Volume 1 – Chapter 2), this included residents, developers, statutory and non-statutory consultees.

3.5 A separate exercise of email, letter notifications and media releases took place for the Noak Bridge Neighbourhood Plan consultation.

3.6 Organised media releases on the Council Website, social media and the Commonplace platform were created to raise awareness of the consultation period. A statutory notice was published in the Basildon Echo which outlines where documents can be inspected and how residents can respond to the consultation.

3.7 Physical copies of the Draft Local Plan and supporting documents, such as posters, postcards, leaflets and a Q&A were placed on deposit at Basildon Library, Billericay Library, Wickford Library, Laindon Library, Vange Library and Basildon Council Office.

Engagement during the Consultation

3.8 During the second phase of Regulation 18 consultation, in person consultation events took place as an opportunity for residents to gain insights and ask questions about the Local Plan and the Town Centre Masterplan. On Thursday 3rd April members from the Basildon Planning Policy Team ran a stall in Eastgate Shopping Centre from 11am to 1pm and held two sessions in the evening from 3:30pm to 5pm and 5:30pm to 7pm at the Towngate Theatre. Information regarding the consultation events were publicised throughout the consultation on the Council's website, Commonplace platform, email notifications via Commonplace and through social media releases.

3.9 The Council's Customer Contact Centre were also available to assist residents with using the Commonplace platform and book appointments for anyone who required additional assistance to take part in the consultation.

3.10 The Local Plan team were also available for phone calls for those that wanted to speak to the team directly regarding the Local Plan and took bookings for face-to-face meetings in the Basildon Centre.

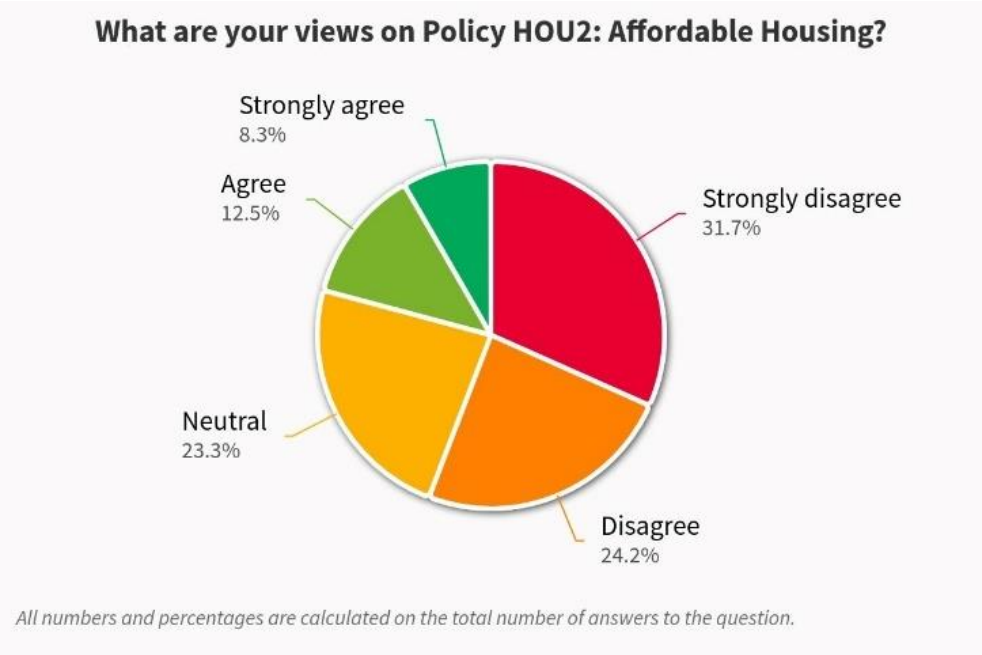
3.11 The consultation received 536 contributions from 272 respondents, with over 5,106 visitors to platform during the consultation period. In addition 44 responses were received by letter or email.

Summary of Representations

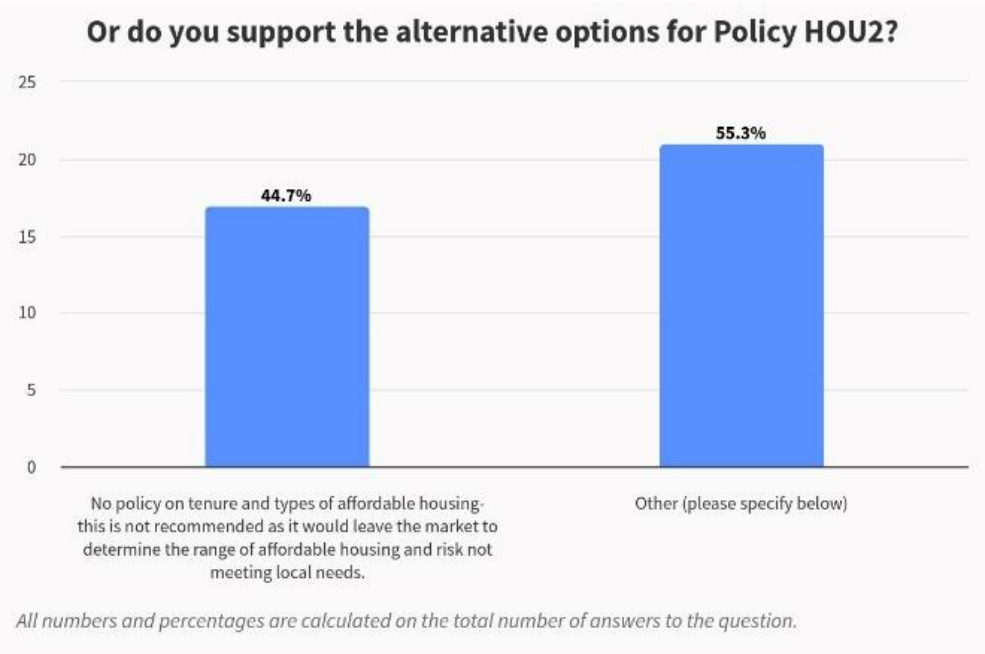
Chapter 6 – Meeting Housing Need – Part 2

A further consultation was held on a revised policy HOU2 – Affordable Housing.

We asked:



We asked:



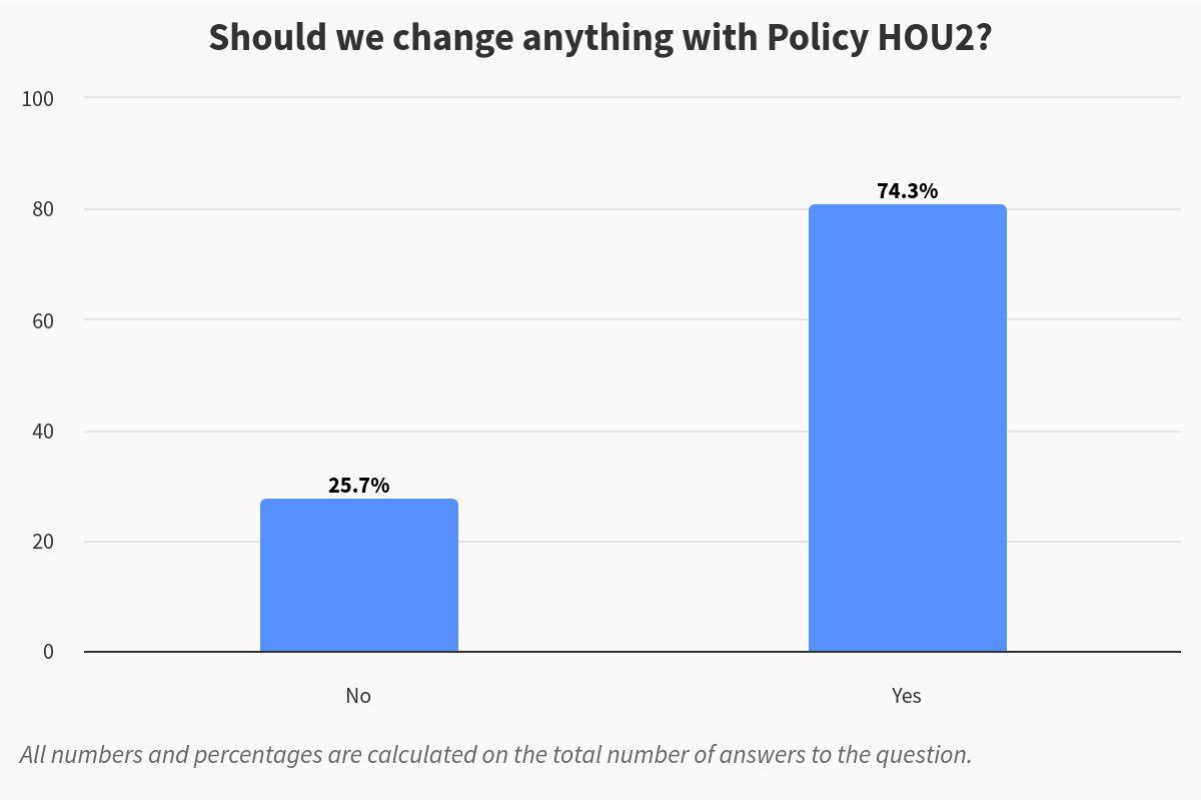
We asked:
If you have selected “other” above, please specify.

The main comments raised were:

Main comments	Basildon Council's response
50% affordable housing requirement should apply to Grey Belt as well as Green Belt.	This requirement applies to Grey belt sites.
Affordable housing should be delivered on brownfield land.	Subject to viability assessment, affordable housing is required on brownfield land.
Affordable housing should be in keeping with market housing.	This is consistent with policy
All affordable housing should be in for rent.	This is not consistent with the evidence base.
Deliver more social housing	The South Essex Housing Needs Assessment 2022 identified the proportion of need which can be met by different forms of affordable housing. This will be kept under review.
Deliver more affordable housing.	The South Essex Housing Needs Assessment 2022 identified a need for 521 new affordable homes per annum. Therefore, the Draft Local Plan makes provision for 10,420 new affordable homes over the plan period. This need will be kept under review.
Infrastructure should be delivered before housing.	An updated Infrastructure Delivery Plan will be prepared in 2025.
Ensure affordable housing requirements are delivered.	The Local Plan will be independently examined, and a monitoring framework will be introduced.
Policy should be subject to viability assessment.	The policy will be subject to viability testing.
Policy is too prescriptive about levels and tenure of affordable housing.	The policy will be subject to viability testing. The Council will consider if additional flexibility is justified.
Rely on empty homes.	This would not be consistent with national policy.
Require 65% social housing.	The South Essex Housing Needs Assessment 2022 identified the proportion of need which can be met by different forms of affordable housing. This will be kept under review. There is no justification for a requirement of 65%
Introduce financial penalties for sites not delivering affordable housing.	There is no legal basis for this proposal.
Revise to reflect new NPPF/NPPG	Policy will be revised.
Support for affordable housing.	Support noted
Threshold for affordable housing should be higher than 50%	This is not consistent with national policy.
Support of 38% affordable dwellings across all sites.	This is no longer consistent with national policy which require increased

Main comments	Basildon Council's response
	contributions when sites are released from the green belt.
Greater flexibility should be allowed to determine affordable housing requirement on a site-by-site basis.	The policy will be subject to viability testing. The Council will consider if additional flexibility is justified.

We asked:



We asked:
If you have selected "yes" above, what should we change/add to policy HOU2 and why?

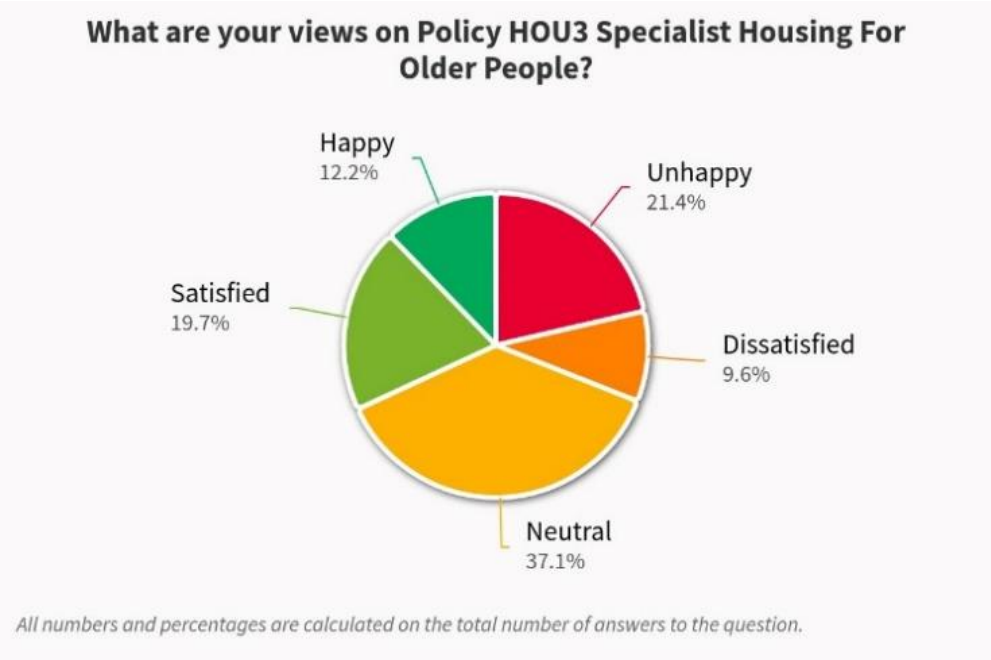
The main comments raised were:

Main comments	Basildon Council's response
Affordable housing should be distributed through the Borough.	Noted. This is consistent with the policy.
All houses should be affordable to the lowest income	This would not be practical.
There should be more focus on delivering affordable homes for sale.	This would not be consistent with the evidence base.
Clarify if affordable housing is required on grey belt sites.	Affordable housing.
Deliver higher proportion of social housing.	This will be kept under review but
Objection to 50% affordable housing on sites released from the Green Belt.	Subject to viability assessment, 50% is consistent with the NPPF.
Seeks assurance that affordable housing will be delivered.	The Local Plan will be subject to viability appraisal and a monitoring framework

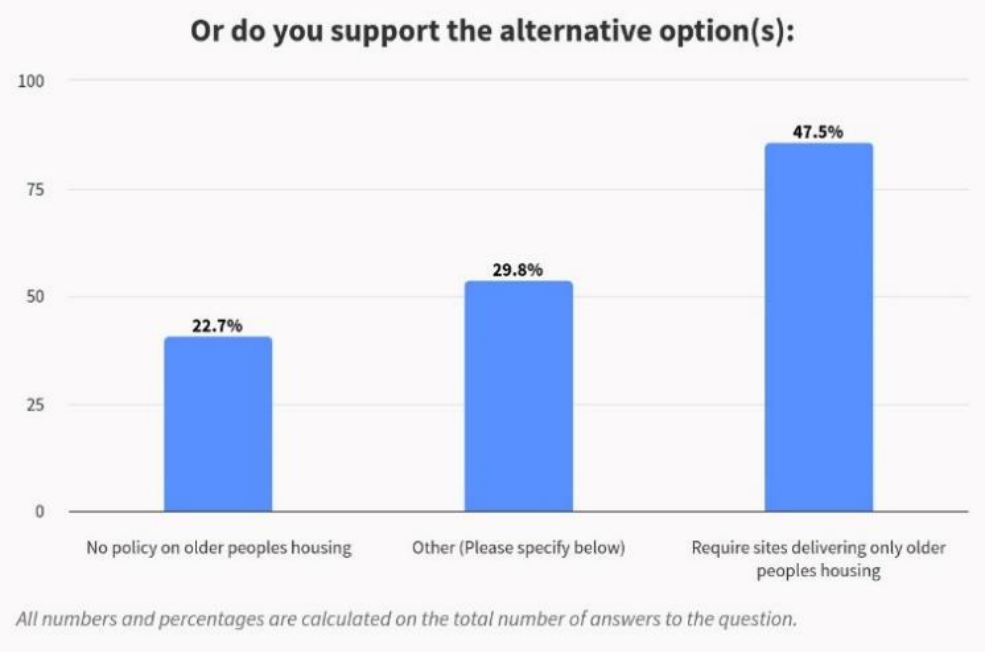
Main comments	Basildon Council's response
	will be put in place.
Perception that affordable housing is not affordable to local young people.	The policy seeks to deliver a range of affordable housing.
Objection to affordable housing for discount sale.	This would not be consistent with evidence.
Objection to social housing.	The NPPF requires the Council to deliver a range of affordable housing to meet the needs of residents.
Objection to policy.	Noted.
Objection to tower blocks.	Noted.
Prioritise housing for homeless households.	The policy seeks to deliver housing for all households unable to assess open market housing.
Perception that affordable housing will be subsided by Council Tax.	This is incorrect.
Objection to requirement that affordable housing should be constructed to the same standards as market housing.	This would not be consistent with the objective of delivering communities.
Reduce proportion of affordable housing.	This would not be consistent with evidence.
Priorities specialist housing for older people.	This is addressed by policy HOU3.
Question about the justification for percentage of affordable housing provision on non-green belt sites.	Subject to viability assessment, 50% is consistent with the NPPF.
Restrict to or prioritise local residents.	The Local Plan sets out to deliver sufficient housing for future residents. However, it is not appropriate to limit this to the needs of current residents as it would not reflect the patterns of movement in and out of the borough, for example, relocation for employment purposes.
Perception that 50% affordable housing is being used to allow green belt land to be designated as grey belt land.	This is incorrect. A Grey Belt Study has been commissioned.
Support for policy.	Support noted.
Support for higher provision of affordable housing.	This would not be consistent with current evidence, but need will be kept under review.
Consider prefabricated housing.	This would be address at application stage.
Deliver a higher proportion of social housing.	The South Essex Housing Needs Assessment 2022 identified the proportion of need which can be met by different forms of affordable housing. This will be kept under review.

Policy HOU3 - Specialist Housing for Older People

We asked:



We asked:



We asked:
If you have selected “other” above, please specify.

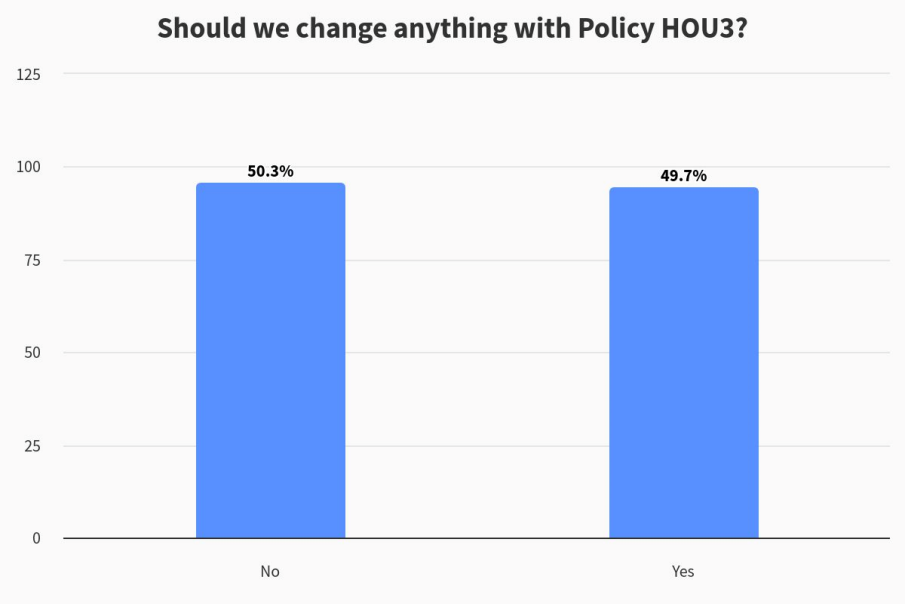
The main comments raised were:

Main comments	Basildon Council’s response
Deliver housing for older people/downsizing.	Support noted.

Main comments	Basildon Council's response
Require bungalows.	The Council has commissioned updated evidence on housing need for specialist and supported accommodation. This will inform revision to the policy. Generally, the Council will seek to avoid low density housing. The NPPF states that it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.
Deliver more affordable housing.	The South Essex Housing Needs Assessment 2022 identified a need for 521 new affordable homes per annum. Therefore, the Draft Local Plan makes provision for 10,420 new affordable homes over the plan period. This need will be kept under review.
Support for high quality housing.	Support noted.
Ensure new development is in a sustainable location.	In identifying locations for growth, the Local Plan has assessed the sustainability of the Location.
Incorporate specialist housing/housing for older people within allocations / development.	Noted. This will set out in the revised allocation policies.
Objection to delivery of specialist housing for older people.	This would not be consistent with the evidence base.
Objection to delivering housing on Green Belt.	The Council has undertaken a review of all available urban land in Basildon Borough and considered potential to increase density in highly sustainable locations such as Basildon Town Centre. The Council has also engaged with other Essex Local Authorities to establish is growth can be accommodated elsewhere. The Council has commission a Grey Belt Study which will inform the next iteration of the Local Plan.
Objection to delivery/quantum of specialist housing for older people.	The Council has commissioned updated evidence on housing need for specialist and supported accommodation. This will inform revision to the policy.
Objection to Standard Method of calculating housing need.	The Council is required to determine the minimum number of homes needed using the standard method in national planning practice guidance.
Objection to high-capacity care homes.	Generally, care homes are required to

Main comments	Basildon Council's response
	have a high number of beds to ensure they are viable to operate and can offer a range of facilities.
Perceived lack of supporting infrastructure.	Following agreement of a spatial strategy for delivering growth, a new Infrastructure Delivery Plan will be prepared.
Perceived lack of space for housing.	The Local Plan proposed location for housing.
Prevent conversion of bungalows into larger properties.	The Local Plan has limited ability to make policies about this as many conversions are permitted development.
Support for delivering accessible housing.	Support noted.
Plan should be more flexible to open market needs.	The Council will review this policy and consider potential for greater flexibility around open market homes.
Require bungalows.	The Council has commissioned updated evidence on housing need for specialist and supported accommodation. This will inform revision to the policy. Generally, the Council will seek to avoid low density housing. The NPPF states that it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.
Supports affordable specialist accommodation.	Support noted.
Technical comment from developer or other industry professional.	Noted. This will inform revision of the policy.

We asked:
Should we change anything with Policy HOU3?



We asked:
If you have selected “yes” above, what should we change/add to policy HOU3 and why?

The main comments raised were:

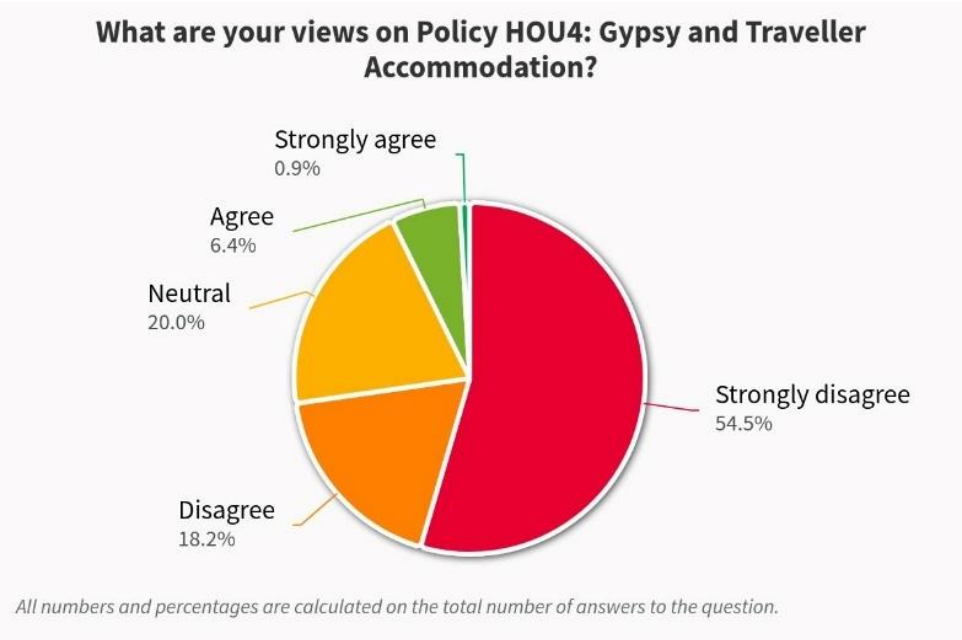
Main comments	**Basildon Council’s response**
Deliver a higher quantum of housing for older people/downsizing.	The Council has commissioned updated evidence on housing need for specialist and supported accommodation. This will inform revision to the policy.
Support for high quality housing	Support noted
Deliver more affordable housing.	The Council has commissioned updated evidence on housing need for specialist and supported accommodation. This will inform revision to the policy.
Housing for local residents.	The Local Plan sets out to deliver sufficient housing for future residents. However, it is not appropriate to limit this to the needs of current residents as it would not reflect the patterns of movement in and out of the borough, for example, relocation for employment purposes.
Deliver housing on brownfield sites.	The Council has reviewed all opportunities to deliver housing in the urban area. However, it is not possible to deliver the full housing need without Green Belt release.
The importance of delivering supporting infrastructure alongside development.	An updated Infrastructure Delivery Plan will be prepared in 2025.

Main comments	Basildon Council's response
Ensure new development is in a sustainable location.	This is addressed in chapter 4.
Supports affordable specialist accommodation.	Support noted.
Incorporate specialist housing/housing for older people within allocations/development.	The Council has commissioned updated evidence on housing need for specialist and supported accommodation. This will inform revision to the policy.
Housing for residents.	The Local Plan sets out to deliver sufficient housing for future residents. However, it is not appropriate to limit this to the needs of current residents as it would not reflect the patterns of movement in and out of the borough, for example, relocation for employment purposes.
Objection to delivering housing on Green Belt.	The Council has undertaken a review of all available urban land in Basildon Borough and considered potential to increase density in highly sustainable locations such as Basildon Town Centre. The Council has also engaged with other Essex Local Authorities to establish is growth can be accommodated elsewhere. The Council has commission a Grey Belt Study which will inform the next iteration of the Local Plan.
Perceived lack of supporting infrastructure.	Following agreement of a spatial strategy for delivering growth, a new Infrastructure Delivery Plan will be prepared.
Objection to delivery/quantum of specialist housing for older people.	The Council has commissioned updated evidence on housing need for specialist and supported accommodation. This will inform revision to the policy.
Concerns about risk of flooding and/or surface water drainage.	This is addressed by policy CC2.
Objection to impact on wildlife and/or the natural environment.	All housing sites will be required to deliver 10% biodiversity net gain.
Objection to Standard Method of calculating housing need.	The Council is required to determine the minimum number of homes needed using the standard method in national planning practice guidance.
Objection to development on agricultural land.	This is addressed by Chapter 13.
Objects to new housing on existing sports pitches and facilities.	This is addressed by the Healthy Communities Chapter.
Require bungalows.	The Council has commissioned updated

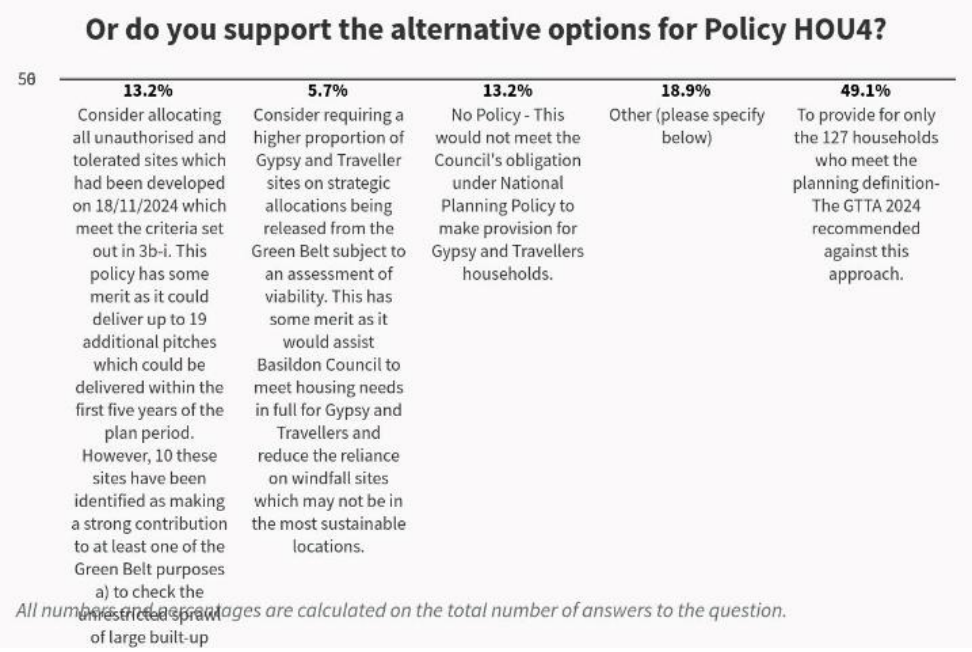
Main comments	Basildon Council's response
	evidence on housing need for specialist and supported accommodation. This will inform revision to the policy. Generally, the Council will seek to avoid low density housing. The NPPF states that it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.
Perceived lack of supporting infrastructure.	Following agreement of a spatial strategy for delivering growth, a new Infrastructure Delivery Plan will be prepared.
Prevent conversion of bungalows into larger properties.	The Local Plan has limited ability to make policies about this as many conversions are permitted development.
Support for delivering accessible housing.	Support noted.
Technical comment from developer or other industry professional.	Noted. This will inform revision of the policy.
Support for allocating sites for specialist accommodation for older people.	The Council has commissioned updated evidence on housing need for specialist and supported accommodation. This will inform revision to the policy.

Policy HOU4 – Gypsy and Traveller Accommodation

We asked:



We asked:



We asked:
If you have selected “other” above, please specify.

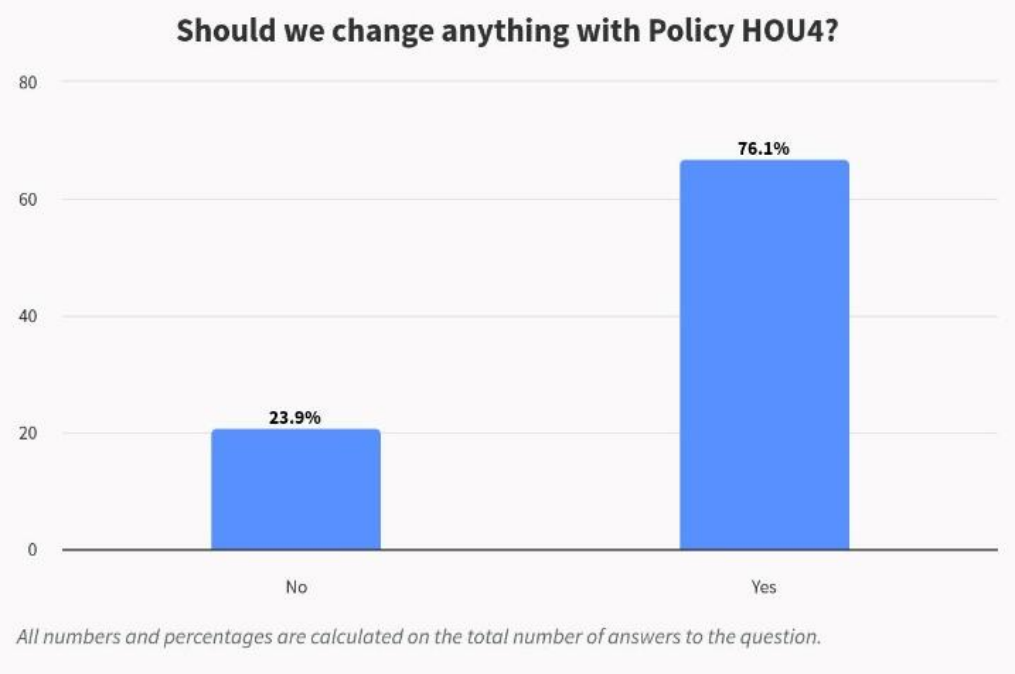
The main comments raised were:

Main comments	**Basildon Council’s response**
Allow greater flexibility for developers of strategic allocations to deliver off site provision and/or commuted sums.	The Council will consider potential for some flexibility, but it should be noted that insufficient land has been located for sites without green belt release. The strategic allocations have been identified as the most appropriate locations for green belt release.
Increase allocations deliverable in 5-10 years.	This approach has been considered and will be reviewed to take account of the Grey Belt Study.
Objection to policy	The NPPF requires the Local Plan to meet the housing needs of all members of the community including gypsy and traveller households.
Objection to the provision of Gypsy and Traveller sites.	The NPPF requires the Local Plan to meet the housing needs of all members of the community including gypsy and traveller households.
Provide for transit sites only.	This would not be consistent with the evidence base.
Secure provision on brownfield sites.	There are insufficient suitable brownfield sites.
Following delivery of the required sites, enforcement action should be carried out on any unauthorised sites.	This is outside the scope of the Local Plan.

Main comments	Basildon Council's response
Need to front load delivery.	There is limited capacity to do this as much of the need can only be met by green belt release. This will be
Lower threshold for provision on strategic allocations.	The Council will consider potential for some flexibility, but it should be noted that insufficient land has been located for sites without green belt release. The strategic allocations have been identified as the most appropriate locations for green belt release.
All current unauthorised sites should be regularised.	This approach has been considered and will be reviewed to take account of the Grey Belt Study.
Questions if there are inaccessible sites in the Borough.	Inaccessible refers to the proximity of sites to key local services and amenities.
Question about deliverability of sites on strategic allocations.	The Local Plan will be subject to whole plan viability testing and will be independently examined.
Need to set out where grey belt is located.	The Council has commissioned a Grey Belt Study which will inform site allocations.
No business should be run from sites.	This would be determined at application stage.
Objection to delivery on strategic housing allocations.	Insufficient land has been located for sites without green belt release. The strategic allocations have been identified as the most appropriate locations for green belt release.
Questions about how need has been calculated.	This is set out in the Basildon Gypsy and Traveller Accommodation Assessment 2024.
Objection to provision on green belt.	Insufficient land has been located for sites without green belt release or development in the green belt.
Objection to the scale of sites required. Fewer sites should be provided.	This is not consistent with the Basildon Borough Gypsy and Traveller Accommodation Assessment 2024.
Perception there is sufficient Gypsy and Traveller sites in Basildon.	This is not consistent with the Basildon Borough Gypsy and Traveller Accommodation Assessment 2024.
Perception design and location criteria could not be enforced.	The Local Plan will be subject to whole plan viability testing and will be independently examined.
Perception policy cannot be delivered.	The Local Plan will be subject to whole plan viability testing and will be independently examined.
Provide minimum requirement	Proposed provision is consistent with

Main comments	Basildon Council's response
	the Basildon Borough Gypsy and Traveller Accommodation Assessment 2024.
Sites should be in Billericay	Noted
Sites should be located alongside the A127.	Noted
Sites should be delivered in one area.	Given the scale of need this is impractical.

We asked:



We asked:
If you have selected "yes" above, what should we change/add to policy HOU4 and why?

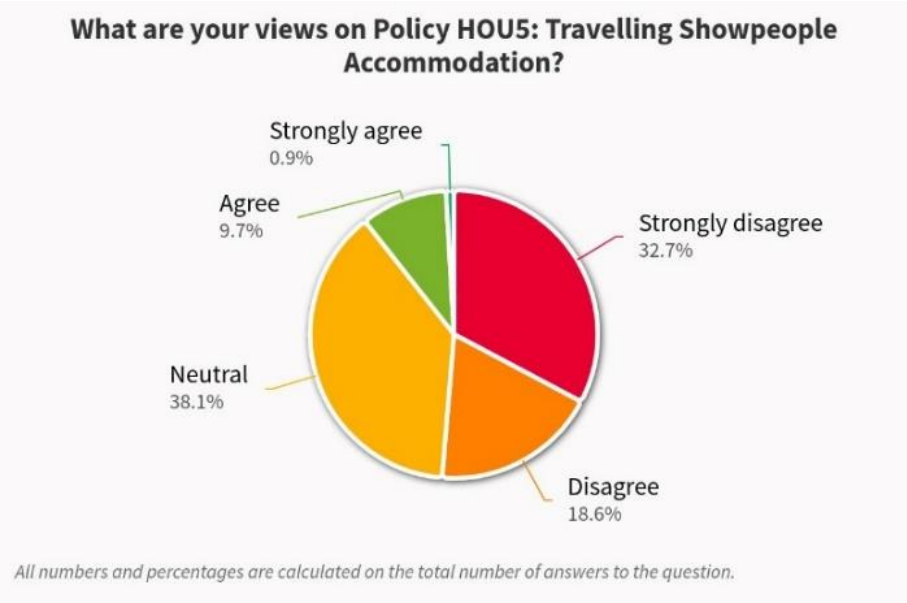
The main comments raised were:

Main comments	Basildon Council's response
Allow greater flexibility for developers of strategic allocations to deliver of site provision and/or commuted sums.	The Council will consider potential for some flexibility, but it should be noted that insufficient land has been located for sites without green belt release. The strategic allocations have been identified as the most appropriate locations for green belt release.
Increase allocations deliverable in 5-10 years.	This approach has been considered and will be reviewed to take account of the Grey Belt Study.
Objection to policy.	The NPPF requires the Local Plan to meet the housing needs of all members of the community including gypsy and

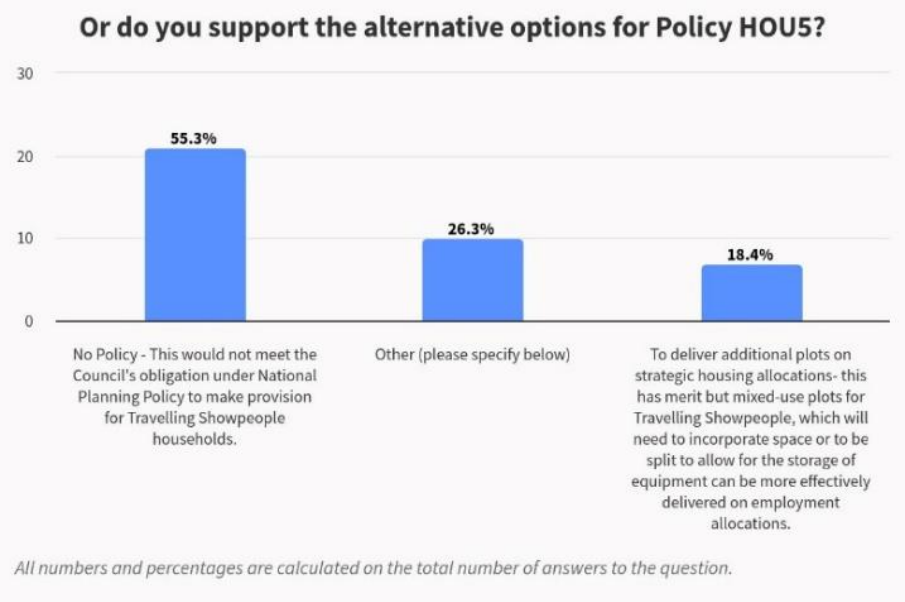
Main comments	Basildon Council's response
	traveller households.
Objection to the provision of Gypsy and Traveller sites.	The NPPF requires the Local Plan to meet the housing needs of all members of the community including gypsy and traveller households.
Provide for transit sites only.	This would not be consistent with the evidence base.
Secure provision on brownfield sites.	There are insufficient suitable brownfield sites.
Identify specific locations for Gypsy and Traveller sites.	This approach has been considered and will be reviewed to take account of the Grey Belt Study.
The policy requires viability testing.	A whole plan viability assessment will be carried out in 2025. Policy will be reviewed to ensure it remains deliverable.
Promote additional pitches at existing established gypsy and traveller communities.	This approach has been considered and will be reviewed to take account of the Grey Belt Study.
Technical comment for developer on calculation of provision on strategic allocations.	Noted. This will inform the revision of the policy.
Objection on grounds of potential impact on the delivery of strategic sites.	The strategic allocations have been identified as the most appropriate locations for green belt release. The policy will be subject to viability testing.

Policy HOU5: Travelling Show people Accommodation

We asked:



We asked:

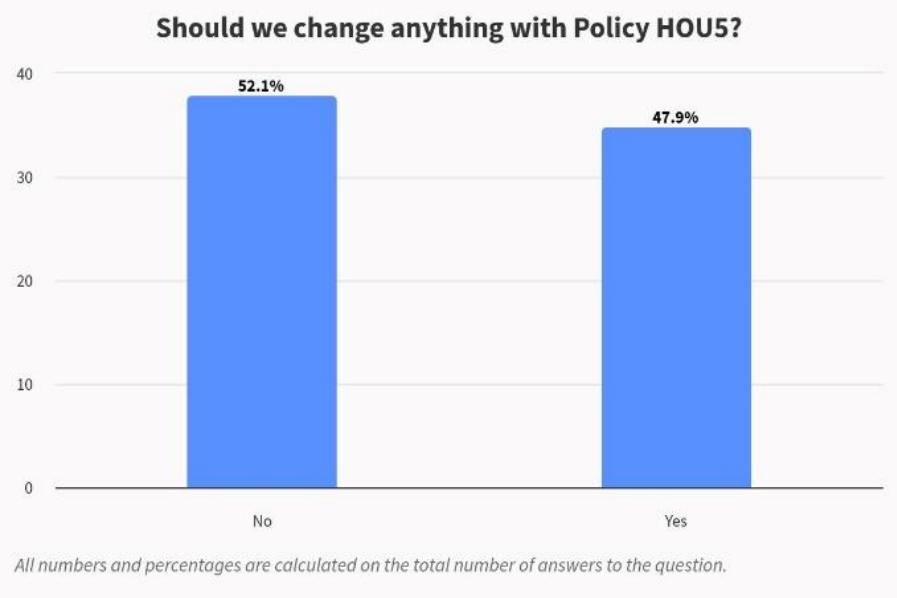


We asked:
If you have selected “other” above, please specify.

The main comments raised were:

Main comments	**Basildon Council’s response**
Build sites in very remote areas	This would not be consistent with the spatial strategy.
Need to set out where grey belt is located.	The Council has commissioned a Grey Belt Study which will inform site allocations.
Objection on the ground of capacity of current infrastructure.	An updated Infrastructure Delivery Plan will be prepared.
Objection to delivery on green belt sites.	Insufficient land has been located for sites without green belt release or development in the green belt.
Objection to the provision of Travelling Show people sites.	The NPPF requires the Local Plan to meet the housing needs of all members of the community and the Basildon Borough Gypsy and Traveller Accommodation Assessment 2024 identified a need.
Perception that policy cannot be delivered.	The Local Plan will be subject to whole plan viability testing and will be independently examined.
Question about the evidence for this policy.	This is set out in the Basildon Borough Gypsy and Traveller Accommodation Assessment 2024.
Note that land in certain locations has conditions preventing use for travelling shows.	Noted.

We asked:



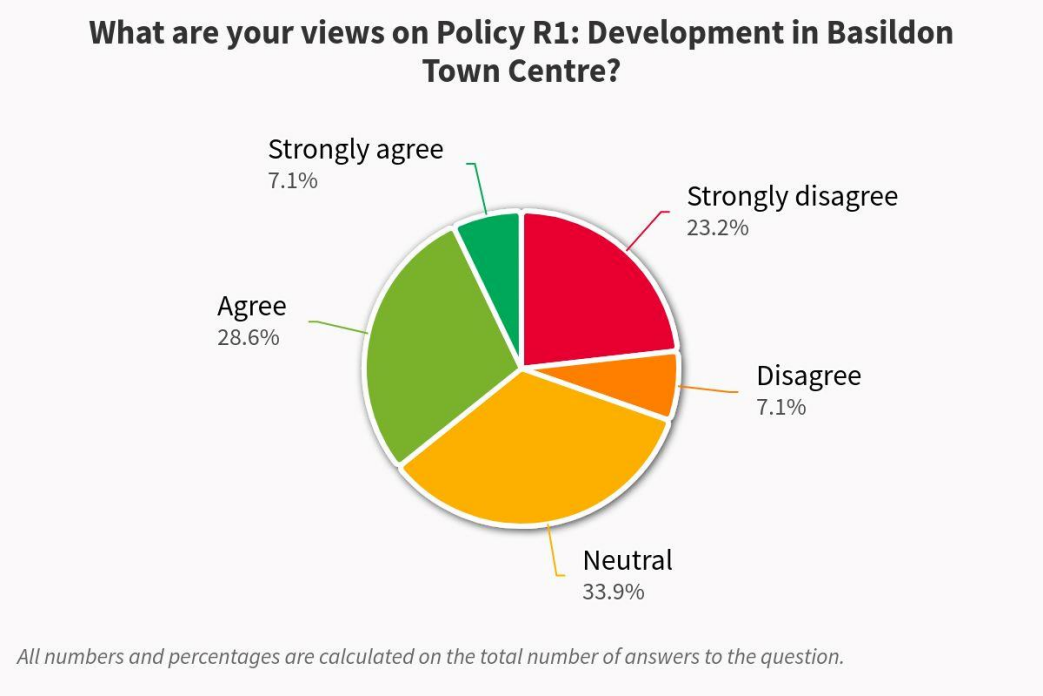
We asked:
If you have selected “yes” above, what should we change/add to policy HOU4 and why?

The main comments raised were:

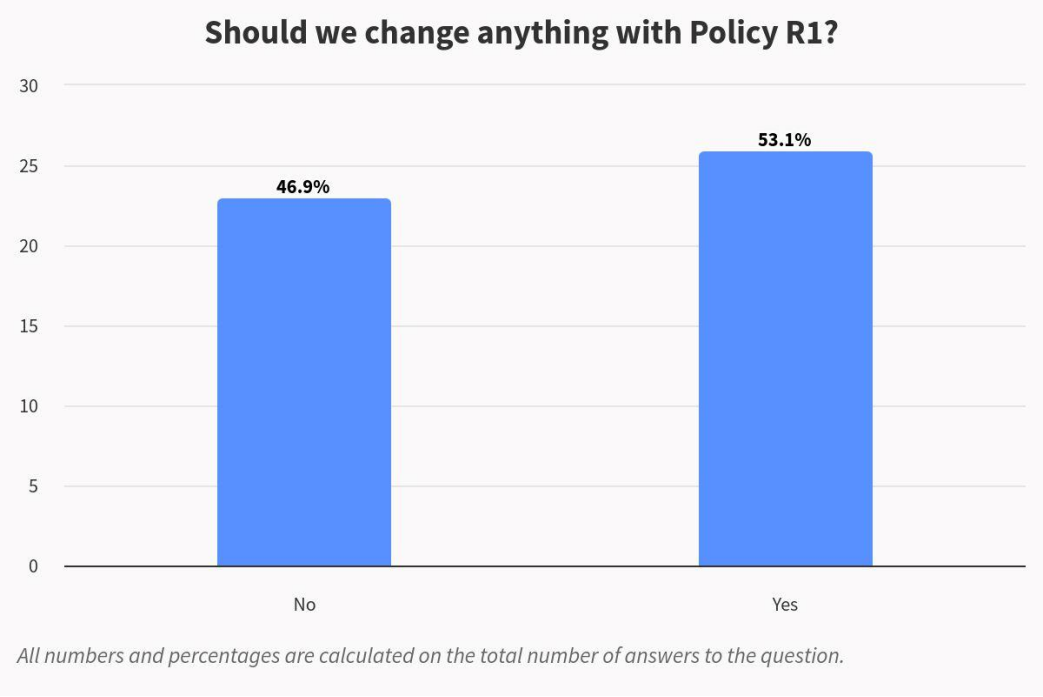
Main comments	**Basildon Council’s response**
Secure provision on brownfield sites.	There are insufficient suitable brownfield sites.
Deliver on grey belt sites.	The Council has commissioned a Grey Belt Study which will inform site allocations.
Objection to the provision of Travelling Show people sites.	The NPPF requires the Local Plan to meet the housing needs of all members of the community and the Basildon Borough Gypsy and Traveller Accommodation Assessment 2024 identified a need.
Regularise current unauthorized sites	There are no suitable unauthorized sites.
Provide leased sites	This will be determined at application stage.
Need to identify grey belt land	A Grey Belt Study has been commissioned.
Consider allocating outside of employment land.	The Council will consider if suitable alternative locations are identified in the Grey Belt Study. However, generally the Council has sort delivery on employment sites as Travelling Show people site have both functions.

Chapter 7 – Ensuring vitality of the Town Centre – Part 2

We asked:



We asked:



We asked:
What should we change/add to policy R1 and why.

The main comments raised were:

Main comments	Basildon Council's response
Don't have blocks of	Housing is identified as an acceptable main town centre use

Main comments	Basildon Council's response
flats in the town centre.	by the NPPF. The NPPF expects higher density development in locations well served by public transport, including town centres. Residential uses can also help to improve footfall in a town centre.
Matters outside scope of Local Plan (complaints about high parking charges).	The Local Plan promotes an appropriate mix of uses within Town Centres which will help to ensure their continued vitality.
There's a lack of infrastructure to support residential expansion.	The Local Plan will contain policies which seek contributions from new development to help fund necessary upgrades.
Opposition to the plan for an arena in Basildon Town Centre.	Noted. However, national planning policies set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. A facility which encourages inward investment and assists in raising the profile of the town and borough is likely to prove beneficial.
Allow permitted development to develop homes in the town centre.	The NPPF expects higher density development in locations well served by public transport, including town centres. The Council does not have any Article 4 directions in place which restrict the use of permitted development rights enabling conversions to residential use.
This policy should also concentrate on other Town Centres within the Borough rather than just focusing on Basildon Town Centre.	This policy considers Basildon Town Centre only due to the publication of the draft Masterplan. A further full draft plan will be consulted upon in the Autumn containing policy for all town centres. The Reg 18.2 document advised that it should be read in conjunction with the earlier Reg 18.1 document, which was a full plan consultation containing a wider range of policies, and not a shorter, focused, targeted document.
Too much emphasis on residential development in the town centre. Retail improvement in the town would attract visitors and residents into the area if there is much better choice of shops and outlets and less reliance on eateries and cheap shops.	Housing is identified as an acceptable main town centre use by the NPPF. The NPPF expects higher density development in locations well served by public transport, including town centres. The Local Plan is unable to directly influence shopping choice; the Use Class Order does not distinguish between e.g. different companies offering the same type of goods for sale or providing similar services. Similarly, many macro-level factors which have made the retail environment challenging for smaller operators are outside the control of the Local Plan.
Support for policy R1.	Support noted.
Further detail is required relating to the local pan including a housing trajectory.	Noted. There will be a further Regulation 18.3 consultation in the autumn, this will be a whole plan consultation including further Development Management policy content.

Town Centre Masterplan Part 1 – Resident comments

We asked: “What would encourage you to spend more time in the town centre?”:

Main comments	Basildon Council’s response
More diverse and improved shopping options.	The Council vision to build homes in Basildon town centre will add to the resident population and increase footfall. It is considered this will assist the process of urban renewal and attracting inward investment, helping to bring greater variety in terms of the facilities available.
Improved food and drink options.	As above, encouraging more people to live in the town centre is likely to generate higher levels of footfall, and greater range of services and facilities than are currently available.
Better safety and security.	Encouraging more people to live in the town centre is likely to generate higher levels of footfall, and provide opportunities for both natural and controlled surveillance, with positive results for both crime and the fear of crime.
More sustainable transport options.	Most new residential developments will be required to contribute towards infrastructure upgrades. The precise nature of this will be agreed on a scheme-by-scheme basis.
Better evening options and nightlife, an art gallery	Encouraging more people to live in the town centre is likely to generate higher levels of footfall, and greater range of services and facilities than are currently available.
Enhanced leisure and recreational facilities,	Encouraging more people to live in the town centre is likely to generate higher levels of footfall, and greater range of services and facilities than are currently available.

Developer comments: NB: comments were only received against “Do you have any ideas or comments on the town centre appraisal?”:

Main comments	Basildon Council’s response
1.your housing development plan has many caveats for developers in Billericay to still build primarily large expensive family homes without opportunity for the social development plan aspect being applied, for instance can provide social	National policy requires the housing needs of all groups in the community to be met, this includes affordable housing options. Infrastructure contributions will be sought from new development.

Main comments	Basildon Council's response
housing elsewhere to offset development. 2.Problem with saturating Billericay with development is infrastructure of transport, roads, school places, doctors, parking simply all already oversubscribed. 3. you say town centre planning should enhance existing characteristics, clearly a high street which is already regularly grid locked now at pressure times will just be a permanent ring of traffic, hardly enhancing. 4.your healthy community plan not supported with greenbelt surrounding a small town to be encroached on all around. 5.new parking regulations particularly for lake meadows will impact community events such as parkrun, men's, shed and various walking groups. Regulation is needed but poorly thought through to accommodate actual users of park. 6.you use the term access in lots of documentation and yet Billericay is already becoming inaccessible due to population so more population will only increase problem. Naturally everyone thinks Basildon politically doesn't care about Billericay and sees it as a source of Council tax and to be honest I am beginning to feel that may be true. I have lived here for 45 years and hopefully be here many more if not forced out by expansion plans that are simply too much.	When the final allocations are known, an Infrastructure Delivery Plan (IDP) will be prepared. The IDP will provide information on the cost of all the necessary infrastructure, as well as details of the projects which will be required to deliver the growth envisaged through the Local Plan.
The size and scope of these housing developments proposed in the Plan should encourage forward thinking. Billericay High Street in the future should be pedestrianised and a new road built to bypass the High Street to avert future disasters happening such as: the railway bridge in Mountnessing Road and the two other railway bridges close by which are over a hundred years old and are already	Any new infrastructure projects which are required will be evidence-led.

Main comments	Basildon Council's response
showing signs of deterioration They were not built for the volume of traffic today, let alone the future. How much longer will they stand before a major incident occurs.	

Town Centre Masterplan Part 2 – Residents

We asked: "Do you have any ideas or comments about the masterplan priorities":

Main comments	Basildon Council's response
Support the commitment to biodiversity, in addition to green space.	Support noted
Parking should be free, plentiful and safe for people and vehicles. Plenty spots catering for disabled both for parking and when in the town centre areas.	Noted, however national planning policy promotes movement by walking, cycling and public transport over the private car. The Local Plan and Masterplan cannot be used to set parking charges, while some of the borough's car parks are additionally operated by private companies.

We asked: Should we change anything in the policy on Public Realm and Open Space? If you answered Yes, please specify what changes/additions you would like to see and why.

Main issues	Council response
Residential housing will mean too great a call on parking and vehicle use of access road. I do not think infrastructure around the town centre will support residential housing in the town centre. There should be high policing presence to ensure safety of all users and strong deterrents for anyone disrupting the ambience and safety.	New development will be required to contribute towards infrastructure provision.
Clarify that that green infrastructure should be native and wildlife friendly species to ensure genuine ecological enhancement. Also, water features to be designed to be beneficial to wildlife.	Noted.

We asked: Should we change anything in the policy on Connectivity and Movement? If you answered Yes, please specify what changes/additions you would like to see and why.

Main comments	Basildon Council's response
The town centre is not the place for football or other similar sports. Gloucester park or other leisure facilities should be used. Football attracts the type of people who would not fit into your stated plan of art and entertainment and shopping.	A mixture of uses will be sought in the town centre in future, which includes some new commercial leisure provision. This is acceptable under national policy. However, retail uses will remain.

We asked: Should we change anything in the policy on Land Use?

Main comments	Basildon Council's response
Do not reduce parking for visitors as this will disadvantage the disabled. Residential is not appropriate at all. Making parking only for the use of residents will in effect make the town centre venue the only residents have access to. I think this plan is destined to fail. Resident use will not be able to support the financial need to the facilities you proposed. Your plan is not financially or socially viable.	The NPPF defines housing as one of several uses which are deemed appropriate within town centres. To deliver regeneration and inward investment, a component of housing is both acceptable and necessary. National policy promotes travel by walking, cycling and public transport over private car use.

We asked: Should we change anything in the policy on Biodiversity and Greening?

Main comments	Basildon Council's response
You are providing primarily for the residents. I need to go there without adequate parking, as you know the current town centre parking is disliked by shoppers as it's not safe. People pay bar still find same better shops no longer support their needs and they're fed up with the parking. I think you are trying to do too much and will fail for the lack of what people want.	National policy promotes travel by walking, cycling and public transport over private car use.

We asked: Should we change anything in the policy on Sustainability and Building Health?

Main comments	Basildon Council's response
I do not think the plan is good so it will fail.	Noted.
Sustainability and Building Health: We endorse the approach to supporting the circular economy and reducing waste as	Noted.

Main comments	Basildon Council's response
one of the principles for achieving sustainable buildings. We would recommend that in high density town centre developments, greywater recycling is promoted to reduce potable water resources and utilise wastewater from handwashing and showers for flushing toilets.	

We asked: Should we change anything in the policy on Making Efficient Use of Town Centre Land?

Main comments	Basildon Council's response
Basic things visitors want English sports, good access roads, shops that fulfil their needs, various entertainment opera ballet plays popular music films street music and cafes safe environment for all users, disabled, families and singles and OAPS. Visitors are the ones that will spend the money, residents will live there but not necessarily spend money there.	The aim of the masterplan is to ensure regeneration and inward investment into Basildon Town Centre. This will help to ensure that a wider range of services and facilities are provided.

We asked: Should we change anything in the policy on Design Characteristics and Quality?

Main comments	Basildon Council's response
You want a lot from the space in terms of buildings. How are you going to ensure adequate parking and open spaces.	These will be delivered in line with the applicable county wide standards in appropriate locations.
Please for clarity, reference integrated biodiversity measures here such as swift bricks.	Accepted

We asked: Should we change anything in the policy on Homes?

Main comments	Basildon Council's response
the town centre if used for residential is an unsupportable economy.	The NPPF defines housing as one of several uses which are deemed appropriate within town centres. To deliver regeneration and inward investment, a component of housing is both acceptable and necessary.

We asked: Should we change anything in the policy on Leisure, Culture and Community?

Main comments	Basildon Council's response
The town centre should not become a replacement for Gloucester park or other leisure facilities.	The town centre will not be replacing Gloucester Park as a leisure facility.
Swimming pool in town centre.	A mixture of uses will be sought in the town centre in future, which includes some new commercial leisure provision. This is acceptable under national policy.

No developer comments received on any of the above.

Town Centre Masterplan Part 3 – residents

We asked: What are your thoughts on the Key Objectives of the Character Areas?

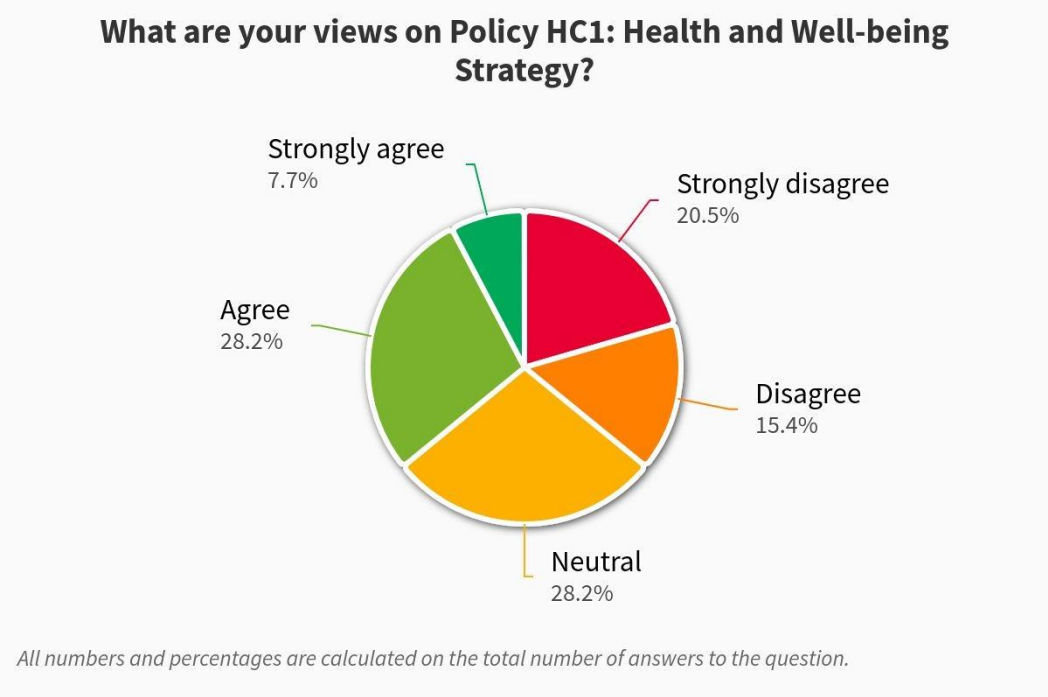
Main comments	Basildon Council's response
Overall making a more cohesive centre with varied uses and addressing the entrances into the town to make it more inviting is good idea. Having more green areas with Public Art will be a more pleasant experience and encourage people to make the town centre a destination and make them want to stay rather than just shop and leave.	Noted.
Totally support conservation/recognition of St Martins +THE MODERNIST ARCHITECTURE/DESIGN of the TOWN CENTRE. DITTO PROPOSED extension of residential provision and clearer pedestrian access to Gloucester Park/other green areas.	Noted.
Initiatives like this have been tried in the past & have been so poorly managed that they detract from the area, because of cost cutting short cuts. If it is insisted upon, cut back on the fancy pants, wasting of money, easy to vandalise elements & it might, just about work. This will need tight budget controls & a decent management team.	Support noted.

1 more comment ruled inappropriate. No comments from developers.

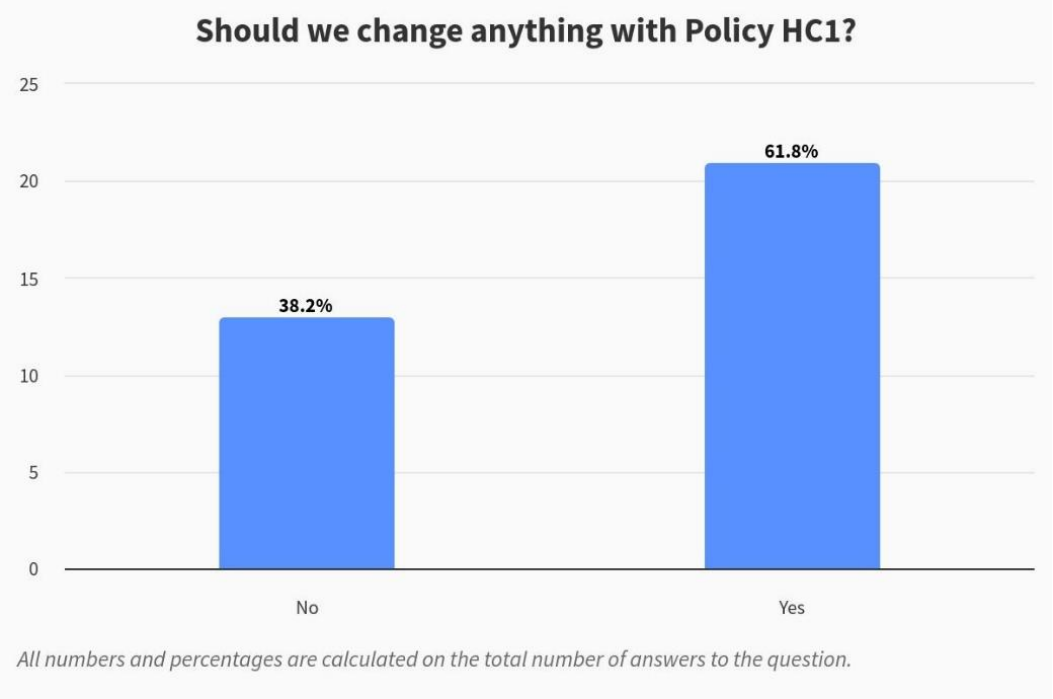
Chapter 15 – Healthy Communities

Policy HC1: Health and Well-being Strategy

We asked:



We asked:



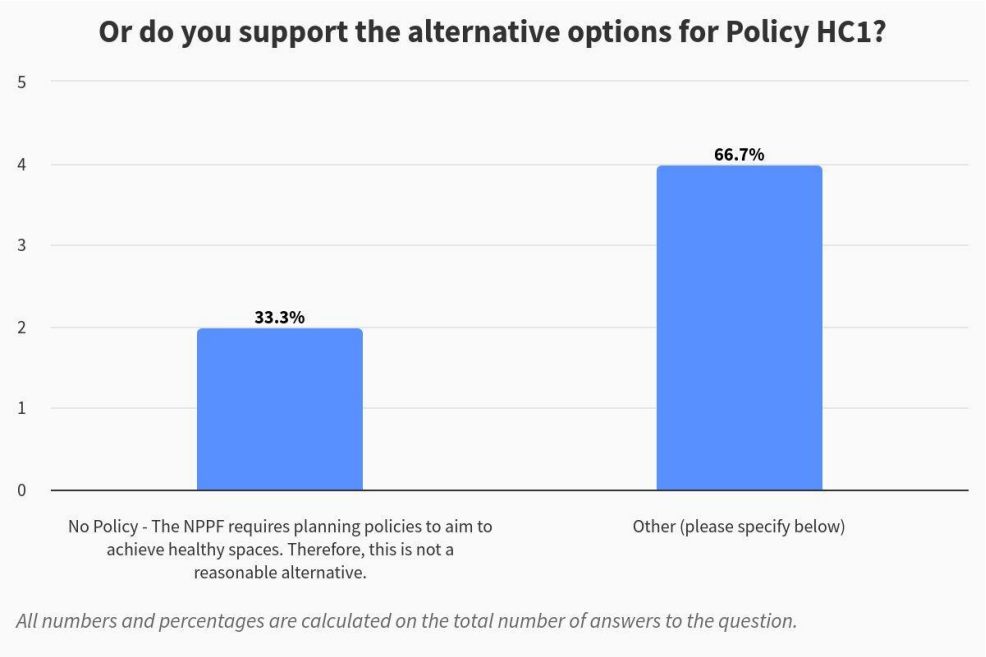
We asked:
If you have selected "yes" above, what should we change/add to Policy HC1 and why?

The main comments raised were:

Main comments	**Basildon Council's response**
Supportive of policy HC1.	Support noted.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Highlights importance of improving infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern around the sufficient provision of infrastructure.	
Provide more open space.	
Cumulative impact of new developments needs to be considered rather than sites in isolation.	
More detail required on infrastructure delivery.	
Concern about loss of green space.	The Council recognises the importance of all green spaces across the Borough, and the plan includes several policies which seek to ensure they are preserved and enhanced.
Concern about impact on existing habitats.	Policy NE1 Conserving and Enhancing the Natural Environment outlines six expectations for new developments to protect and enhance the natural environment.
Queries the strength of the policy requirements.	Noted. The policies will be reviewed, and if required amended, following updated evidence base and comments received as part of the Regulation 18 consultation.
Matters outside the scope of a local plan.	N/A to consultation.
A local plan scale HIA should be carried out rather than on individual sites.	An Integrated Impact Assessment is being undertaken for the Local Plan which will include a Health Impact Consultation for the plan as a whole.

Main comments	Basildon Council's response
Does not support Policy HC1.	Comment noted.
Concern around public rights of way being retained.	Public Rights of Way are protected by law.
Loss of agricultural land.	The Borough has mainly grade 3a/3b (good to moderate quality) and grade 4 (poor quality) agricultural land. Policy AQMP Protecting High Quality Agricultural Land requires site survey work to be undertaken for new development to identify where grade 3a agricultural land may apply so it can be appropriately considered in the planning process.
Need to meet housing needs.	This is addressed in the chapter 'Meeting our Growth Needs'.
Suggested wording amendments to Policy HC1.	Noted, suggestions will be reviewed accordingly.
Viability needs to be considered.	The Plan will be supported by a Viability Assessment at Regulation 19 that will consider the cumulative policy requirements of the Plan on development in the Borough to ensure deliverability and viability.

We asked:



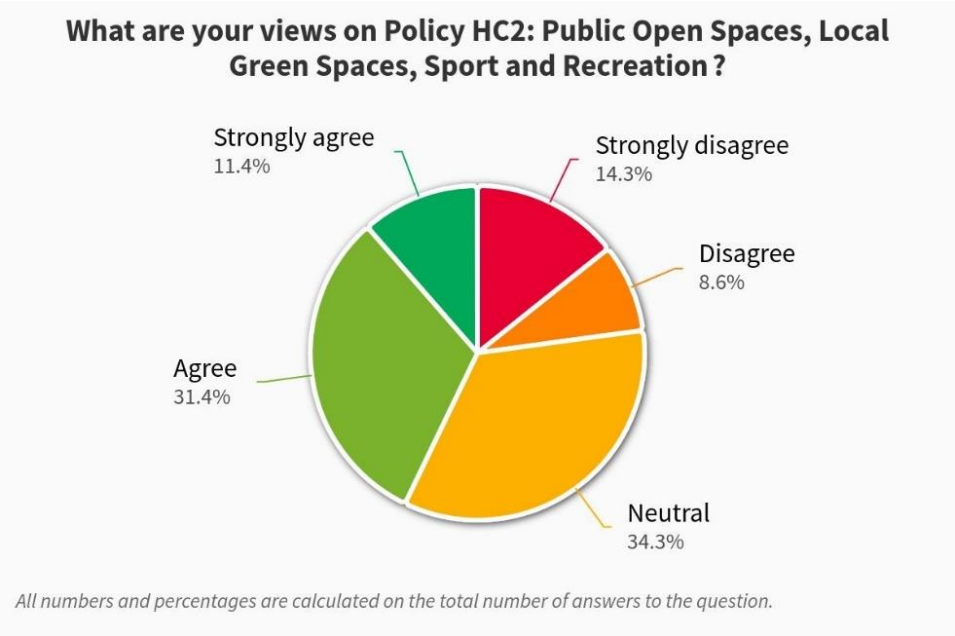
We asked:
If you have selected "other" above, what alternative option do you suggest for Policy HC1 and why?

The main comments raised were:

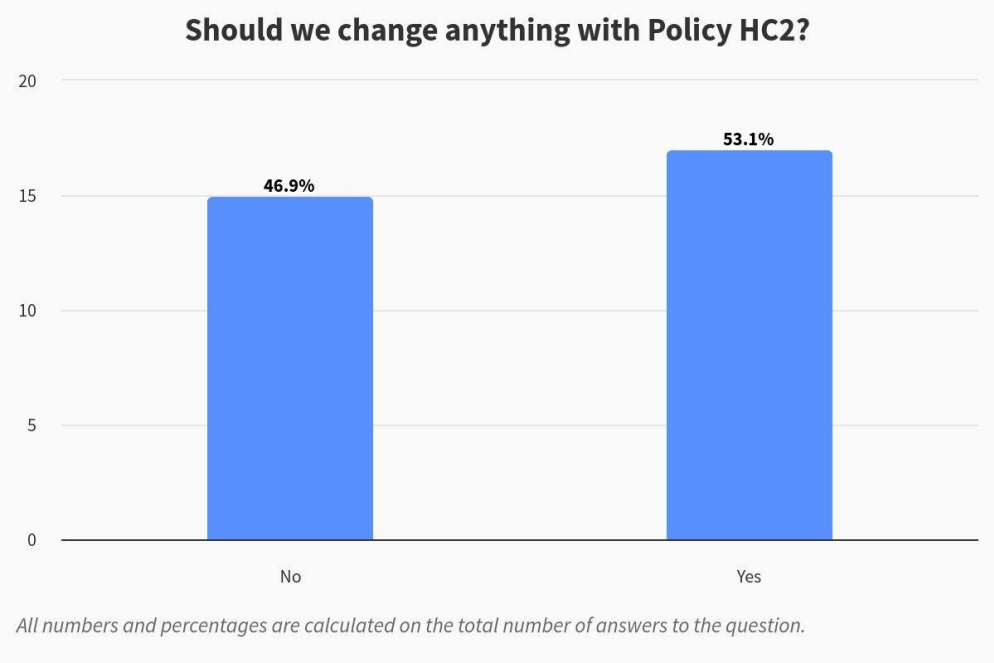
Main comments	Basildon Council's response
Prioritise the delivery of supporting infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern around the sufficient provision of infrastructure.	
Highlights importance of improving infrastructure	
Supportive of brownfield development.	Support noted.
Concern about loss of green space.	The Council recognises the importance of all green spaces across the Borough, and the plan includes several policies which seek to ensure they are preserved and enhanced.

Policy HC2: Public Open Spaces, Local Green Spaces, Sport and Recreation

We asked:



We asked:



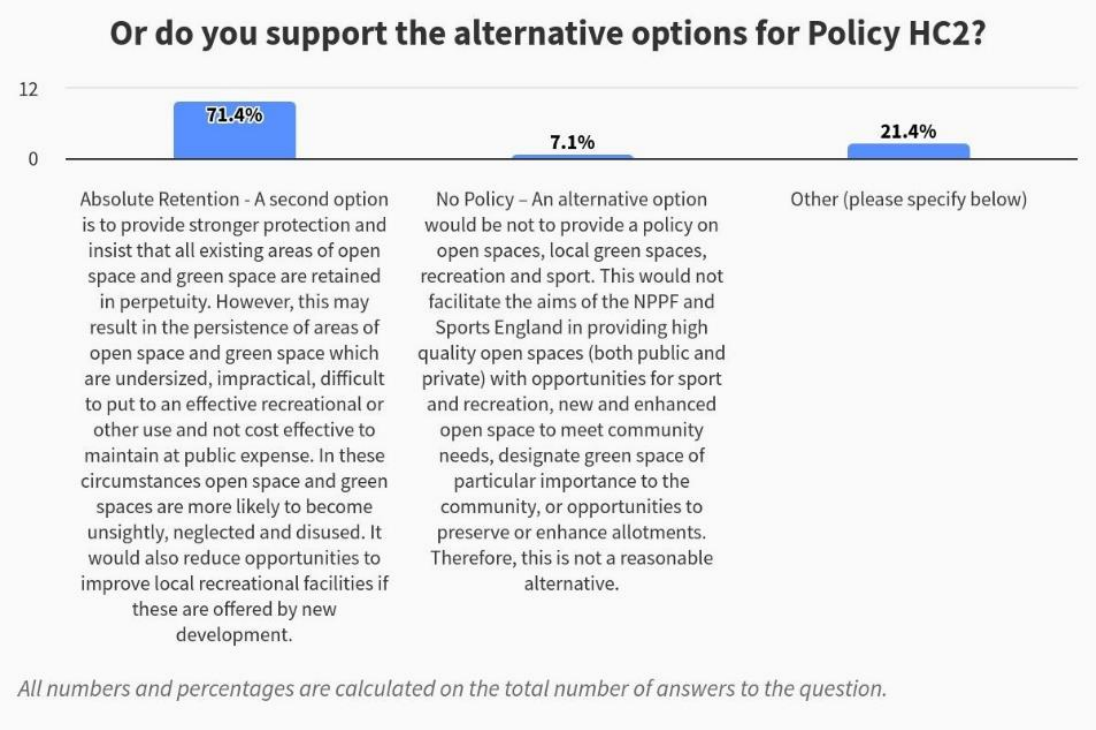
We asked:
If you have selected "yes" above, what should we change/add to Policy HC2 and why?

The main comments raised were:

Main comments	**Basildon Council's response**
Supportive of the policy.	Support noted.
Preserve/protect Green Belt.	Basildon Council has prepared a Green Belt Study and has commission a Grey Belt Study to inform the Local Plan. Basildon Council considers that very special circumstances exist to release land from the Green Belt to meet the need for housing/employment land. In accordance with National Planning Policy, land identified a Grey Belt, is potentially suitable for redevelopment and very special circumstances does not need to be demonstrated.
Suggested wording amendments to Policy HC1.	Noted, suggestions will be reviewed accordingly.
Concern on the impact of development on the character of the area.	The impact of development on the character of an area will be considered at the planning application stage.
Unclear on the understanding of the policy.	Noted. The policies will be reviewed, and if required amended, following updated evidence base and comments received as part of the Regulation 18 consultation.
Prioritise the delivery of supporting	Basildon Council has commissioned an

Main comments	Basildon Council's response
infrastructure.	Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern about loss of green space.	The Council recognises the importance of all green spaces across the Borough, and the plan includes several policies which seek to ensure they are preserved and enhanced.
Further detail required around provision of open space on sites.	Noted. The amount of open space required will be reviewed as part of the site refinement exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.
Preserve existing sport and recreation sites.	Noted. The land promoted and existing uses will be reviewed as part of the site refinement exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.
Does not support Policy HC2.	Comment noted.
Matters outside the scope of a local plan.	N/A to consultation.
Concern around public rights of way being retained.	Public Rights of Way are protected by law.
Proposing land for open space and recreational use.	Noted. The amount of open space required will be reviewed as part of the site refinement exercise which is being carried out following the Regulation 18 part 1 and part 2 consultations.
Queries the strength of the policy requirements.	Noted. The policies will be reviewed, and if required amended, following updated evidence base and comments received as part of the Regulation 18 consultation.
Viability needs to be considered.	The Plan will be supported by a Viability Assessment at Regulation 19 that will consider the cumulative policy requirements of the Plan on development in the Borough to ensure deliverability and viability.

We asked:



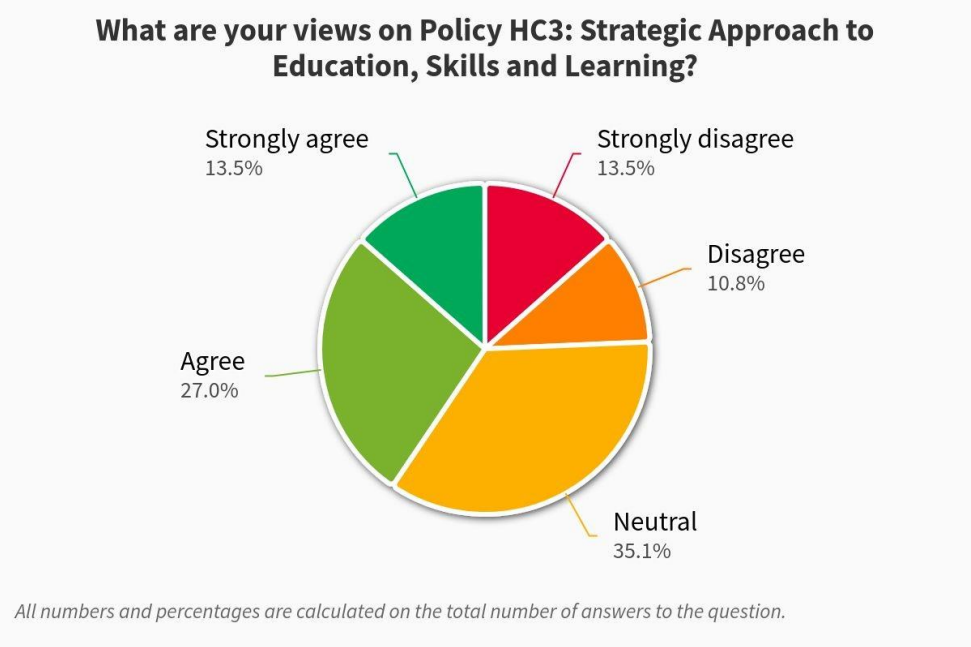
We asked:
If you have selected "other" above, what alternative option do you suggest for Policy HC2 and why?

The main comments raised were:

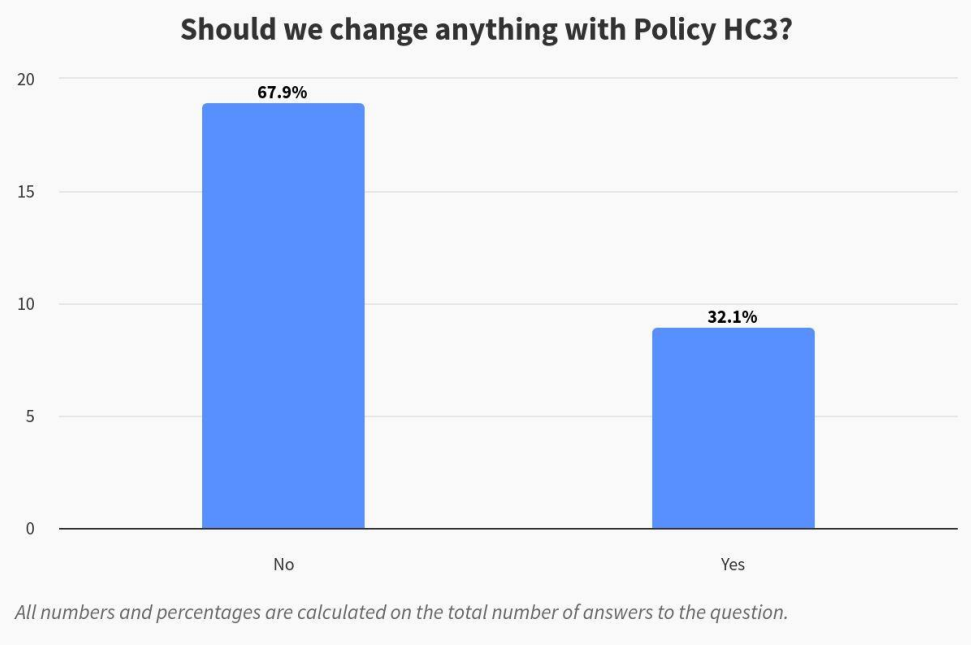
Main comments	**Basildon Council's response**
Ensure developments provide allotments alongside other green space.	Allotments are included under the term green infrastructure which is covered by the policy NE1.
Does not support policy HC2.	Comment noted.

Policy HC3: Strategic Approach to Education, Skills and Learning

We asked:



We asked:

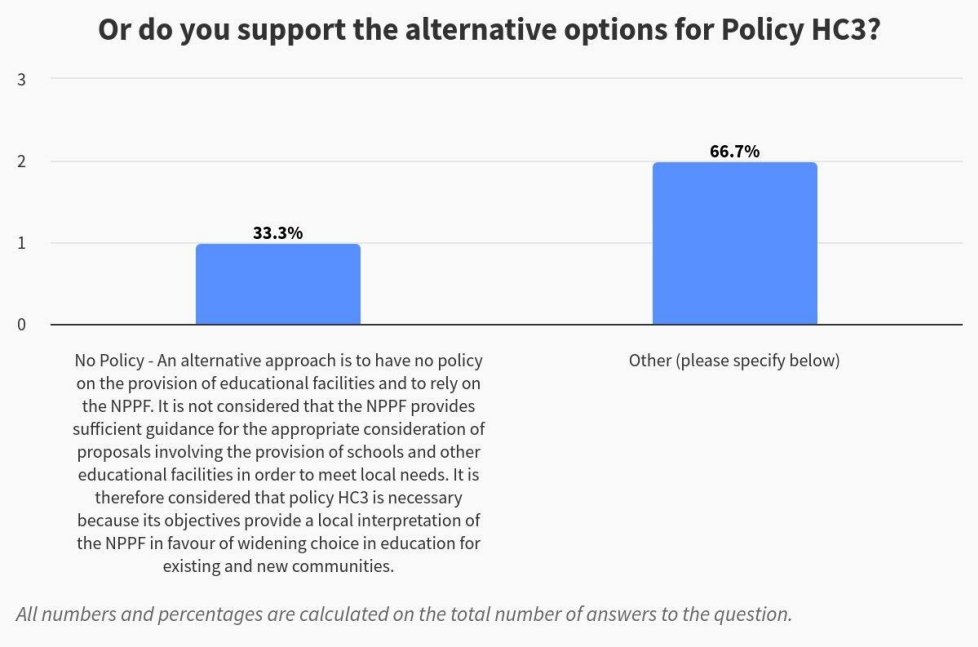


We asked:
If you have selected "yes" above, what should we change/add to Policy HC3 and why?

The main comments raised were:

Main comments	Basildon Council's response
Concern about increased traffic.	Transport capacity modelling has been commissioned.
Concern about school provision.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Concern around the sufficient provision of infrastructure.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Matters outside the scope of a local plan.	N/A to consultation.

We asked:



We asked:
If you have selected "other" above, what alternative option do you suggest for Policy HC3 and why?

The main comments raised were:

Main comments	Basildon Council's response
More detail required on infrastructure delivery.	Basildon Council has commissioned an Infrastructure Delivery Plan which will set out what infrastructure is required, when it is required and how it would be funded. A viability appraisal will be carried out to ensure it is deliverable. The IDP, revised allocation policies and the viability appraisal will be published for a Regulation 18 consultation in late 2025.
Queries the strength of the policy requirements.	Noted. The policies will be reviewed, and if required amended, following updated evidence base and comments received as part of the Regulation 18 consultation.
Matters outside scope of this question.	N/A to consultation.
Support for policy HC3.	Support noted.
Viability needs to be considered.	The Plan will be supported by a Viability Assessment at Regulation 19 that will consider the cumulative policy requirements of the Plan on development in the Borough to ensure deliverability and viability.

Action and next steps

Actions arising from comments received in this chapter are as follows:

- Review, and if required amend, policies in Healthy Communities chapter 15 following updated evidence base and comments received as part of the Regulation 18 consultation. Comments submitted include those relating to policy requirements being too restrictive, requirements to improve water infrastructure, duty to cooperate, utilising existing open space and making improvements and suggested wording changes.

Section / paragraph and page number	**ECC COMMENTS - please consider the following**	**Recommended policy / actions**	**Basildon Agreed Next Steps**
ECC General Comments on the draft Plan as a whole			
Draft BBLP and Statement of Consultation	<u>ECC Response to 2023 IOCP Consultation and BBC Statement of Consultation</u> ECC refer BBC to our representations to the 2023 Regulation 18 Issues and Options Consultation Paper (IOCP); which were duly made and our email of 6th March 2024, advising that the Statement of Consultation Report did not capture all of ECC's consultation responses, with the following examples where it had not recognised ECC's representations. Examples include ECC Healthy and Sustainable Communities (including Education and Libraries), Prosperous Economy (in part); Town Centres, Promoting Sustainable Transport (in part) Securing Sufficient Infrastructure (including infrastructure planning, Delivery, Mitigation & Stewardship; Digital, Minerals and Waste Planning Authority, and Waste Disposal Authority), Spatial Options and Delivering Growth section (comments on spatial themes, strategy, principles for future development, necessary local plan evidence and assessment, Transport (including strategic transport corridors, cross boundary matters and evidence), cross boundary matters and NSIPS. As advised ECC would not expect our comments to be presented in full, however had expected ECC's representations under the corresponding themes and questions to be acknowledged and with a brief summary, as presented elsewhere in the Statement of Consultation Response. ECC note BBC officers acknowledged ECC's comments had been duly made and submitted and would be used to inform the emerging plan and that there had been an error in transferring the responses and note the general statement in the Cabinet report for ongoing engagement with ECC as an infrastructure and service provider.	ECC and seek clarification on how these matters have been carried forward to inform the draft Plan, noting omissions to these themes within the draft Plan and supporting evidence, including for example the Topic Paper Gypsy Traveller and Travelling Showpeople. The topic paper specifically refers to IOCP comments received, however, there is no reference to ECC's comments and preferences.	
BBC consultation documents	<u>2024 Draft BBLP Consultation Documentation & Website</u> ECC recognise the need for BBC to consult on the emerging Local Plan and pressures in relation to the potential risk of Government intervention, following the withdrawal of the Local Plan from examination (wBLP). However, ECC recommend that BBC ensure that the documentation presented through the consultation portal fully reflects the pdf version of the draft Plan. For example, Chapter 14 *Initial proposals for Growth and Change*, introductory paragraphs and specifically the introductory paragraphs before the table with the high-level assessment of the proposed site allocations, and specifically paragraph 14.01-14.16 are not available on the consultation portal.	Suggest BBC seek to ensure the consultation documents in the pdf and consultation portal align to avoid potential confusion or misunderstandings	

	This is particularly pertinent given BBC's assurances within paragraph 4.6 regarding BBC carrying out further appraisals considering the cumulative impact of delivering all the preferred sites and that a new IDP will be prepared.		
Duty to Co-operate	<u>Duty to Co-operate</u> In accordance with provisions of the Localism Act 2011 (or any replacement) ECC support and will continue to work and contribute cooperatively with BBC in the preparation of the new Local Plan. This includes the refinement of the strategy and spatial options, proposals and policies to deliver a sustainable pattern of growth (together with supporting evidence) and with reference to ECC's response to the IOCP which continue to apply, within the challenging timetable. ECC seek to ensure our statutory roles and responsibilities are raised with BBC to be addressed and delivered appropriately through the plan making process. ECC maintain the need for BBC to undertake effective ongoing strategic and cross boundary engagement with ECC under the duty in accordance with paragraphs 24 to 28 of the NPPF. BBC has engaged ECC officers in the following activities in plan preparation to date, • ECC attends regular meetings with BBC covering plan-making activities • ECC has responded to the Issues and Options Consultation Plan (IOCP) in 2023 • ECC has inputted into the Strategic Flood Risk Assessment (SFRA) (Level 1) • ECC as Highways and Transportation Authority (and Essex Highways) have engaged with BBC to inform the transport requirements for commissioning external consultants for the necessary transport evidence as part of the Strategic Growth Options assessment and Cumulative Infrastructure and environmental constraints assessment. • ECC engaged with the 2022/23 Green Belt Study, raising the need to include a review of schools to be removed from the Green Belt, to enable potential expansion in capacity given the level of planned growth. • Initial introductory meeting on the emerging Basildon Town Centre Master Plan. ECC notes the stepped change in growth to be planned for and the potential sites allocations in Chapter 14, supported by an initial high-level IAA. ECC strongly support BBC in preparing further appraisals and evidence including a cumulative infrastructure and environmental impact assessments to inform the preferred strategy, site selection, site requirements and IDP. This has been commissioned by BBC alongside an IDP as required to inform the	BBC and ECC to work together under the duty to address the strategic and cross boundary matters identified by ECC (Policy SG1 and paragraph 14.6) through the preparation of additional evidence (refer to ECC response to the IOCP consultation) and the need to address the cumulative and individual site infrastructure and environmental impact assessments, that we understand will be taking place following this consultation. This evidence is necessary to support the preparation new local plan's Preferred Strategy and Site selection to address the full range of infrastructure requirements and environmental constraints.	Agree

	Regulation 19 Plan and will be vital for the next steps on how sustainable growth is delivered by addressing spatial issues with ECC (including with other organisations on these issues) in meeting housing needs, delivering strategic infrastructure and building economic and climate resilience. ECC will assist in the viable delivery of key services and the provision of infrastructure arising from planned growth within the borough and beyond, in the right location, at the right scale and time. The significant increase in the number of new homes to be planned for, an increase of 8,000 new homes compared to the withdrawn local plan (wBLP) and the quantum and location of new potential site allocations introduce new strategic and cross boundary challenges to be addressed, including potential implications on strategic transport corridors (see the response on the Transport chapter and Appendix 1). ECC seek further collaboration on strategic policy making matters to ensure a consistent approach to planning and delivery of infrastructure including transport, waste, minerals, education and other social infrastructure as outlined in NPPF paragraph 28. ECC will contribute positively with BBC to regular, effective and timely ongoing engagement, under the duty on this and other evidence, to ensure matters are addressed appropriately in the Regulation 19 Plan. In doing so, BBC, in consultation with ECC and other partners, can plan and provide the required infrastructure and services; whilst securing necessary funding.		
Additional Local Plan evidence required to inform next iteration of the local plan	<u>Additional Local Plan Evidence required to inform the next iteration of the local plan</u> ECC anticipate BBC may need to review the approach to plan-making, including existing and emerging evidence requirements in light of the revised NPPF (December 2024). The response to the IOCP outlined additional evidence requirements and the strategic and cross boundary matters identified by ECC which we maintain continue to apply, especially with the planned increase in growth. It is too early for ECC to provide detailed site comments, and BBC and ECC will need to work together through the further cumulative and individual evidence as listed below to inform the next iteration of the plan, with regard to ECC infrastructure and service requirements. ECC anticipate that this evidence will also seek to address potential strategic and cross boundary matters as raised by service areas (and listed below). ECC note some evidence has commenced and others remaining outstanding. • Need to address and understand (a) a strategic long-term approach with ECC and neighbouring Councils in relation to strategic and cross boundary matters including developments on strategic transport	BBC and ECC will need to work together in preparing this evidence to support the preparation of the new local plan's Preferred Strategy and site selection to address ECC infrastructure and service area requirements. ECC seek further collaboration on these strategic policy making matters to ensure a consistent approach to planning and delivery of infrastructure including transport, waste, minerals, education and other social infrastructure as outlined in NPPF paragraph 28. This engagement will need to be accelerated given the local plan timetable and to ensure that this is effective, timely and ongoing under the duty. This will ensure BBC, in consultation with ECC, can plan and provide the necessary infrastructure and services whilst securing necessary funding. The need for BBC to work jointly with ECC on the cumulative infrastructure and environmental impact assessments is referenced throughout the response for the respective services.	Agree to joint working under the DTC.

	corridors and potential cross boundary developments; and (b) the principles for future development, to agree delivery mechanisms in principle that could be included within the new local plan (see SG1 Growth Needs and throughout). • Transportation evidence – commenced with new NPPF vision led approach, for developments to be in sustainable and accessible locations, including active and sustainable transport, modelling, mitigation and delivery mechanisms. This is essential to understand and explore potential implications and options in relation to the strategic transport corridors, including the A127 within a wider strategic context (see Appendix 1). • Education – A Full scenario testing for education provision will need to take place including early years and childcare, primary, secondary, and Special Education Needs with Disabilities (SEND) provision; and regard to Adult Education (as referenced in the new NPPF), • Green Belt Review/addendum, update having regard to the new NPPF, potential site allocations and maintain the need to remove Education facilities from the Green Belt. • Flood and Water Management, to include the latest Critical Drainage Areas within the individual site constraint (as outlined in the Level 1 SFRA), suggest a need for a level 2 Strategic Flood Risk Assessment, and continue to recommend BBC update their 2011 Water Cycle Study. • Minerals and Waste local plans policy site compliant assessments in relation to prior extraction and Waste Infrastructure Impact Assessments (see Appendix 2). • Continue to engage ECC in the preparation of the Basildon Town Centre Master Plan, including Essex Libraries and Adult Community Learning, noting Adult Education now referenced in new NPPF, • Continue to engage ECC on the IDP and seek master plan policy approach to strategic sites and to engage ECC on viability Reports and ensure necessary implementation delivery strategies, to ensure developments are in sustainable locations with the right infrastructure phased at the right time with full funding. • Seek engagement on the emerging Economic Land Review. • Ensure the draft Plan is informed by and has regard to the Health Impact Assessment to ensure health and wellbeing is comprehensively considered and embedded into the Local Plan; with a policy for improving Health and Wellbeing, an area ECC can advise and assist, and one successfully implemented and included in other plans across Essex. • Continue to engage in Climate Change and Bio-diversity Green and Blue Infrastructure policy and evidence. • Evidence in respect of skills, Supported and Specialist Housing, Public Health, and green and blue infrastructure including the emerging Essex		

	Local Nature Recovery Strategy) to deliver safe, green, healthy communities. The need for this additional evidence and to update the existing evidence base is relevant given the significant increase in the number of new homes to be planned for, an increase of 8,000 new homes compared to the withdrawn local plan (wBLP) and the quantum and location of new potential site allocations introduce new strategic and cross boundary challenges to be addressed, including potential implications on strategic transport corridors (see response to Chapter 8 below).		
Statement of Common Ground	<u>Statements of Common Ground</u> ECC and BBC should enter into a Statement of Common Ground with BBC in accordance with the NPPF (paragraphs 28 and 36). ECC is committed to continue working with BBC as it prepares its Regulation 19 new Local Plan. While this is not a duty to 'agree', regular and ongoing officer meetings (and potentially with Members) continue to ensure all of ECC representations made to the Plan are discussed and resolved. Such meetings provide the opportunity for both Local Authorities to highlight matters to inform plan preparation, to address the identified strategic and cross boundary matters; and provision for ECC's infrastructure and service requirements are identified, agreed and funded through the Plan. ECC also recommend BBC should enter into joint Statements of Common Ground with promoters in relation to preferred sites and ECC infrastructure and service requirements to aide consistency for a single public voice. This is considered necessary given the stepped change in the scale of development to be planned for and number of potential site allocations being explored. ECC and BBC should also explore joint Statements of Common Ground on strategic and cross boundary matters arising within and on BBC's boundaries as may be required between BBC, ECC with neighbouring authorities and partners.	For BBC and ECC to enter into a Statement of Common Ground. For BBC and ECC, where appropriate, to enter into Joint Statements of Common Ground with promoters to provide consistency and a single public voice, especially where this will cover ECC infrastructure. For BBC and ECC to enter into Joint Statements of Common Ground with neighbouring authorities and partners as appropriate dependent upon the identified shared strategic and cross boundary issue to be addressed.	Agree to SOCG To discuss joint SOCG with promotors Agree to cross boundary SOCG
ECC and other policies, standards and guidance	<u>ECC and other Policies, Standards and Guidance at December 2024</u> To assist, please find below an updated list of ECC and other policies, plans strategies, standards and guidance, used to inform ECC infrastructure and services requirements, as referred to and relied upon by ECC. The list below is an update to the list of evidence as supplied in response to the 2023 IOCP which continues to apply subject to the updates and additional documentation now supplied (denoted in red). ECC recommend these documents are used to inform and shape the preparation of the new local plan, Integrated Impact Assessment and IDP and other supporting local plan evidence. • ECC Everyone's Essex (2021 – 2025)	BBC to continue to engage with ECC and has regard to the latest policies, standards and guidance as listed to inform preparation of the new local plan, Integrated Impact Assessment and IDP; and to ensure compliance with the Essex MLP and WLP.	Agree

	• Levelling Up – An Essex White Paper (January 2022) and Levelling Up Year Two Impact Report 2023/24 • The Future of Essex • Essex Climate Action Commission Net-Zero: Making Essex Carbon Neutral (July 2021) (ECAC Report) and ECC Response • Essex Climate Action Plan and Essex Climate Action report_2021-22 • Planning Policy Position for Net Zero Carbon Homes and Buildings in Greater Essex (November 2023) • Essex Net Zero Policy Study (July 2023) and Net Zero Carbon Viability and Toolkit Study (2022) • Embodied Carbon Policy Study for Essex (June 2024) See also Essex Design Guide – Net Zero evidence – updates since June 2023 Essex Open Legal Advice – Energy policy and Building Regulations **(Estelle Dehon KC, Cornerstone Barristers, 25 February 2024)** Essex Net Zero Policy Study (Reports 1 and 2) **(Introba, Etude, Currie & Brown, July 2023)** 'Essex Embodied Carbon Policy Study'– technical evidence base **(Levitt Bernstein, Etude, Introba, Hawkins/Brown, Currie & Brown, June 2024)** 'Essex Net Zero Specifications' – Specification Guidance (Introba, Currie & Brown, Etude, Levitt Bernstein July 2024) • Essex Minerals Local Plan 2014 and MLP Policies Map • Essex Minerals Local Plan Review (2021) • Essex and Southend-on-Sea Waste Local Plan 2017 and WLP policies map • Waste Strategy for Essex 2024 • ECC Developers' Guide to Infrastructure Contributions (August 2024) • Essex Joint Health and Wellbeing Strategy (2022-2026) • Essex Housing Strategy 2021 - 2025 • Essex Transport Strategy, the Local Transport Plan for Essex (June 2011) • Essex Transport Strategy LTP4 Consultation Part One, August 2024 • Essex Mobility Hubs and Integrated Transport Halts Implementation Guide 2024 • Transport East – Transport Strategy 2023 – 2050 • Essex Walking Strategy (2021) • Bus Strategy (2015) • Safer Greener, Healthier Communities • Essex Bus Service Improvement Plan 2021 - 26 and Bus Area Network Review - Basildon • Essex Cycling Strategy (2016), Essex Cycle Action Programme, and https://www.essexhighways.org/uploads/files/getting around/cycling/castle-point-borough-cycling-action-plan.pdf Basildon Borough Cycling Action Plan (Nov 2017);		

	• Essex Electric Vehicle Charging Strategy 2024 • 2024 Essex Parking Guidance | Essex Design Guide (December 2024) • School Organisation ECC 10 Year Plan for Essex school places (2024 to 2033) • ECC Local and Neighbourhood Planners' Guide to School Organisation (2020) • Garden Communities and Planning School Places Guide (January 2022) • Essex Early Years and Childcare Strategy 2022 --2027 and Essex Childcare Sufficiency Assessment 2023 (at summer 2023) • Essex SEND Strategy 2022 – 2027 • Success Essex Board - Prosperity and Productivity Plan (2020) • Essex Sector Development Strategy (2022) • Essex Green Skills Infrastructure review (March 2022) • Local Skills Improvement Plan August 2023 and Essex-Southend-and-Thurrock-LSIP-Progress-Report-June-2024 • Essex Skills Plan (2022-2023) • Digital Strategy for Essex (2022) • Everyone's Library Service 2022 - 2026 • Sustainable Drainage Systems (SuDs) Design Guide for Essex (2020) • Water Strategy for Essex (March 2024) • Essex "Our Environmental Statement" • Essex Green Infrastructure Strategy (2020) and Essex Green Infrastructure Standards (2020) • Essex Local Nature Recovery draft Strategy August 2024 • Essex Green Infrastructure Compendium August 2024 • EPOA's Essex Design Guide These are referenced as appropriate throughout this response and remain relevant when referring to ECC's response to the 2023 IOCP.		
Chapter 1 Introduction			
Chapter 1 Paragraph 1.3	The MWPA welcome reference to waste disposal and mineral extraction. The MWPA require appropriate reference to the Essex Minerals Local Plan (MLP) and Essex and Southend-on-Sea Waste Local Plan (WLP) which together, accurately reflects the Development Plan within the Local Plan area, as set out in ECC's response to the IOCP, Section 4, *Securing sufficient Infrastructure Question* 50a part 3 – Minerals and Waste Local Plans and Development Plans. This includes the need for BBC ensure the new BBLP is in compliance with the adopted MWLP's which form part of BBC's development plan and identify the policy requirements for BBC to undertake minerals and waste policy site compliance assessments, as part of the	For BBC to engage the MWPA to ensure the new local plan to include ensure compliance with the MWLPs and to refer to the MWLPs as forming part of the Development Plan for Basildon Borough. BBC to complete necessary Minerals and Waste Policy Site Compliance Assessments on the list of potential site allocations identified in Appendix 2, and to engage ECC as the MWPA in this process. This forms part of the additional evidence base needed to inform the Reg 19 Plan.	Agree to complete necessary Minerals and Waste Policy Site Compliance Assessments and to engage ECC as the MWPA in this process. This will be published for consultation in late 2025.

	additional local plan evidence base requirements (as listed in response to Policy SG1) ECC as MWPA has reviewed the potential site allocations listed in Chapter 14, to identify which potential sites BBC will need to undertake minerals and waste policy site compliance assessments. These are presented in Appendix 2.		
Chapter 2 Spatial Portrait			
General Comment	Support the Spatial Portrait, however, recommend this is expanded to present Basildon Borough in the wider South Essex strategic context.	Suggest expand to present the Borough in the wider South Essex strategic context.	Proposed new paragraph 2.3 Basildon Borough is located within the wider South Essex area and is committed to working in partnership to deliver excellent digital infrastructure, improved connectivity, high quality connected blue and green infrastructure, upskilling our current and future workforce and delivering quality new homes and commercial development.
Our Landscape and Natural Environment Paragraphs 2.10 – 2.12	Suggest the text is amended to provide more landscape character and suggest text from the Basildon Landscape Character Assessments. Suggest expand to highlight the Green and Blue Infrastructure (GBI) as part of the 'landscape and natural environment' section. The following are facts on Basildon in the Essex GI Strategy 2020 that can be used. *The borough has 782 square kilometres of green infrastructure (21% of the county), 5.3% woodland, and 4,058 miles of Public Rights of Way. Basildon ranks third in the county for green and blue infrastructure, covering 38.4% of the borough. The largest types are natural and semi-natural open spaces, areas around premises, and coastal features (marshes), followed by outdoor sports facilities, parks, gardens, and ancient woodlands*.	Change landscape context to read: The Borough's landscape is varied, comprising areas of higher ground at Langdon Hills to the southwest and also to the northeast around Billericay to the flat landscapes of the Thames Estuary at Vange and Bowers marshes and the alluvial valley-floor and tributaries associated with the river Crouch. Its' settlement comprises three main urban development areas…' Add GBI context.	Agree to amend 2.11 The Borough's landscape is varied, comprising areas of higher ground at Langdon Hills to the southwest and also to the northeast around Billericay to the flat landscapes of the Thames Estuary at Vange and Bowers marshes and the alluvial valley-floor and tributaries associated with the river Crouch. Its' settlement comprises three main urban development areas and three serviced settlements, set within arable farmland, permanent grazing with hedgerows, woodland, and a large area of the Thames Estuary's coastal grazing marshland. The plotlands are characterised by sporadic residential development and a mosaic of scrub, grassland, and woodland habitats. 2.13 The borough has 782 square kilometres of green infrastructure (21% of the county), 5.3% woodland, and 4,058 miles of Public Rights of Way. Basildon ranks third in the county for green and blue infrastructure, covering 38.4% of the borough. The largest types are natural and semi-natural open spaces, areas around premises, and coastal features (marshes), followed by outdoor sports facilities, parks, gardens, and ancient woodlands.
Our Education Provision and Performance	ECC recommend the requirement and education performance should also recognise the importance and role of early year and childcare provision.	Refer to and recognise the importance and role of early years and childcare to Education performance.	Suggested new paragraph 2.19 Basildon Borough and Essex County Council are committed to ensuring there are sufficient affordable, quality and inclusive early years and childcare places to give children in Basildon Borough the best start in life

Para 2.14	Factual update required. It is unclear whether the reference is only to mainstream state funded schools but, in this category, there are only 9 'secondary' schools (5 with Sixth forms) including Basildon Lower and Upper Academies which only offer Key Stage 3 and Key Stage 4 places respectively	BBC to review the data in this section and clarify to which types of school the figures refer.	Revised to 8 secondary schools regarding Upper and Lower Academy as equalling to one school and 5 with 6th form provision.
Para 2.15	ECC recommend the removal of the reference to USP (SEEVIC) being located in Basildon and suggest include reference to the Adult Education provision in the borough alongside the schools and Further Education Colleges. ECC Suggest BBC amend the sentence and include reference to Adult Community Learning and the potential to expand current provision. For example, this could be expansion of current ACL Basildon site or relocation of this to town centre location to improve accessibility; or expansion of current South Essex College sites to provide level 1 foundation courses needed by those in the area or sixth colleges for schools such as Woodlands to deliver A Level provision which is lacking in the area and residents would need to travel out of the area currently to access.	Remove reference to USP (SEEVIC), and add refence to the and include reference to the provision of Adult Education in the borough.	Revised to: Higher education and Adult Community Learning opportunities existing at some of the Borough's secondary Academies, as well as with the South Essex College, ~~SEEVIC~~ and ProCAT colleges which have skills campuses in the Borough. Specific opportunities for new or expanded provision will be considered by the IDP.
Para 2.16	Paragraph 2.16 states: *Five mainstream schools in Basildon district host a specialist provision for children and young people with SEND covering autism, dyslexia, hearing impairment and speech and language. The range of needs covered is not comprehensive and further provision may be required based on a further growth in the pupil population.* ECC as the lead local authority for education can confirm that additional SEND provision will be required to meet the needs of the planned level of growth. BBC will need to engage ECC to complete the Education Scenario test, as outlined in response to policy SG1 and paragraph 14.6. However, at this early stage, ECC can confirm with the scale of planned growth of c 27,110 home, there will be a need for a new dedicated SEND school. See comments under chapter 4, policy SG1 Growth Needs.	BBC to engage ECC as the lead local authority for Education to undertake full Education Scenario testing for all Education from Early Years and Childcare, Primary and Secondary schools and SEND provision; in accordance with ECC's Education Guides.	This will form part of the preparation of the IDP, estimated commence June 2025.
Chapter 3 Vision and Strategic Objectives			
Vision and Strategic Objectives	ECC broadly support the vision and strategic objectives subject to suggested changes, updates and additions to strengthen and clarify a number of themes including health and wellbeing, education, training, skills and employment, and the economy (including digital connectivity); housing; climate change and GI. Further evidence (and policies) will be required to deliver the vision and strategic objectives and secure the funding and timely provision of infrastructure to support planned growth, including need to master plan the strategic allocations. A key issue to address is the omission of strategic policies in relation to Digital Connectivity and Health and Wellbeing. (see chapter 8 and 10)	BBC to review the draft Plan to ensure full coverage of Strategic Polices to deliver the Vision and Ambition. ECC recommend that additional policies and sections are required in relation to Health and Wellbeing and Digital Connectivity to appropriately reflect the NPPF.	Health and Wellbeing will be reviewed as part of the response to Part 2 of the consultation. Digital Connectivity BBC to review, noting the requirements of the new NPPF.
Para 3.2 Vision	Suggest including reference to adaptation and resilience to the impacts of climate change.	Change wording as follows.	Agree

		By 2043 we will have mitigated, <u>adapted to, and be resilient to</u> the impact of climate change.	
Strategic Objectives SO1 Protect and enhance the quality of the local environment SO2 Improve the quality and value of the Green Belt SO3 Minimise our impact on the environment SO4 Create Vibrant and thriving town centres SO7 Mitigate against the impact of climate change SO10 Secure the delivery of supporting infrastructure	ECC welcomes that protecting and enhancing the natural environment, including the delivery of Basildon's biodiversity net gain obligations as part of the Local Plan Vision, and BBC engagement on GBI and the planning process from policy to implementation and stewardship. ECC recommend BBC integrate GBI into the overall vision and objectives to embed a golden thread through the Plan. A key issue is the importance of balancing development with nature recovery in compliance with the NPPF. The new local plan will need robust evidence on the benefits and viability of GBI. ECC notes the Government Planning Reform Working Paper: Development and Nature Recovery and should be kept under review in preparing the new LP.	Change as recommended below. SO1 Change to include: *<u>To provide, protect and enhance high-quality multifunctional blue and green infrastructure and its connectivity to landscape wide GBI network</u>* SO2 Change to include: *To provide opportunities to enhance environmental quality and accessibility of the remaining green belt in proportion to development, ensuring attractive and improved landscapes near residential areas, fostering a connection to nature.* SO3 Change to include: *<u>Larger/strategic sites are considered to have flexibility to deliver a higher % of BNG than smaller sites, particularly where multi-functional use of land is secured through master planning</u>* *<u>Maximise resource efficiency to deliver the circular economy</u>* *<u>Encourage the design and multifunctional role of green and blue infrastructure to combat climate change, support health and wellbeing, and enhance both the environment and the economy</u>* *<u>Sustainable modes of travel by enhancing greener travel networks for walking, cycling and horse riding.</u>* SO4 Change to include: *<u>Integrate urban greening of our town centres and public realm where viable</u>* SO7 Change to include: *<u>Utilise Green and blue infrastructure in mitigating and adapting to climate change by enhancing natural resilience, reducing urban heat, and managing stormwater effectively</u>*	Changes generally agreed, amend as follows: SO1: (3rd bullet point) …~~Incorporate access to natural blue and green space into new developments.~~ <u>Provide, protect and enhance high-quality multifunctional blue and green infrastructure and its connectivity.</u> SO2: (add 4th bullet point) <u>Provide opportunities to enhance environmental quality and accessibility of the remaining green belt in proportion to development, ensuring attractive and improved landscapes near residential areas, fostering a connection to nature.</u> SO3: (add two new bullet points) <u>Maximise resource efficiency to deliver the circular economy.</u> <u>Encourage sustainable modes of travel by enhancing greener travel networks.</u> SO4: (add new bullet point) <u>Integrate urban greening of our town centres and public realm where viable.</u> SO7: (add new bullet point) <u>Utilise green and blue infrastructure to enhance natural resilience, reduce urban heat and manage stormwater effectively.</u>
SO5 Strengthening the competitiveness of the Local Economy	Suggest add reference to objective to increase percentage of local residents achieving a level 4 qualification and reducing NEET numbers across the borough. The Strategic Objective focuses on allocating sufficient land but should be strengthened to also cover improving the quality of business accommodation (including location). Omission - Strategic Objective does not mention the four sectors included in BBC's 2024 "Principles of Economic Development" paper.	Change SO5 as recommended. Add reference to increase the percentage of local residents achieving level 4 qualifications and reducing NEET across the borough. Change focus on improving the quality of business accommodation (including location) and is expanded to refer to the four sectors included in Basildon BC's 2024 "Principles of Economic Development" paper.	Under review

SO 7 Mitigate against the impact of climate change	Support the objective to *Mitigate against the impact of climate change*. However suggest bullet 1 is strengthened with the aims of net zero and expand to including material/ resource efficiency.	Change to read *Design new developments and all new homes and buildings to be net zero carbon in operation, minimise embodied carbon emissions and to generate enough renewable energy to match or exceed demand; and to include material/resource efficiency to be* energy and *water efficient and more resilient to climate* Consider the retention and sensitive adaptation, reuse and retrofit of existing and historic buildings as a task for mitigating the impact of climate change. Add new bullets • *Ensure the creation, enhancement and maintenance of green infrastructure in the design of new developments to mitigate the impact of climate change'* • *Promote the retention and reuse of existing buildings, and the appropriate retrofitting of historic buildings.*	Changes generally agreed, amend as follows: SO7: (1st bullet point) Design new developments and all new homes and buildings to be net zero carbon in operation, minimise embodied carbon emissions and to generate enough renewable energy to match or exceed demand; and to include material/resource efficiency to be energy and water efficient and more resilient to climate change. SO7: (add new bullet point) Promote the retention and reuse of existing buildings, and the appropriate retrofitting of historic buildings.
SO8 Help local peopled maintain healthier lifestyles SO9 Enhance the quality of life for all	ECC support the vision and SO8 and SO9 regarding health and wellbeing and suggest changes to align with the revised NPPF; and broaden and clarify how the overarching aims will align with the strategic matters and key issues, including tackling climate change, net zero, urban greening, healthy and sustainable communities, and how they will protect and enhance the environment. To maintain healthier lifestyles and as part of the infrastructure to ensure development is sustainable and contributes positively to existing communities.	Change as recommended. Change SO8 to read *SO8: Help local people to improve and maintain healthier lifestyles* *Bullet 4 Design out obesogenic environments and creating ~~healthy~~ healthier food environments* New Bullet *Promote good health and prevent ill-health in line with Basildon Health and Wellbeing Strategy* *Change SO9 to read* • *~~Improve~~ Ensure equitable access to education, skills, and training* • *Address social exclusion and inequality in healthcare and education* • *~~Improve~~ Ensure equitable access to, and the provision of community, sport, and cultural facilities to facilitate the development of healthier and stronger communities* *Require well designed public spaces which create a safe attractive/green and secure environment* New bullet *Address health inequalities in the borough*	Added to SO8 • Design and create health food environments. • Promote good health and prevent ill-health in line with Basildon Health and Wellbeing Strategy • Encourage the design and multifunctional role of green and blue infrastructure to combat climate change, support health and wellbeing, and enhance both the environment and the economy • Seek to reduce health inequalities within the Borough. Added to SO9 • ~~Improve~~ Ensure equitable access to education, skills, and training. • Address social exclusion and inequality in healthcare and education. • ~~Improve~~ Ensure equitable access to, and the provision of community, sport, and cultural facilities to facilitate the development of healthier and stronger communities.
S010 Secure the delivery of supporting infrastructure	Support but for consistency, ensure the list of infrastructure captures all infrastructure and services. Clearly and transparently set out an appropriate timescale for the delivery of new and improved infrastructure both phased appropriately, and which ensures development viability.	Bullet 3 change the emphasis to recognise the need for transparency on the viability and deliverability of new developments and the timing and phasing of their implementation that the triggers the timely provision of new infrastructure	Added to SO10 • Prioritise new development in well serviced locations. • Ensure new development are supported by the necessary transport, utility, sustainable drainage, green and blue, education and skills, utilities including digital connectivity,

		Change SO10 to read • Prioritise new development in well serviced locations • *Ensure new development are supported by the necessary transport, education, utility, SuDs, green and blue, education, Skills, Digital Connectivity, health, waste management and community infrastructure to ensure development is sustainable and contributes positively to existing communities.* • *To secure transparent, viable and deliverable new developments with clear funding, phasing, implementation and delivery mechanisms, to secure the funding and land for the timely provision of new infrastructure from new developments rue and services, from new*	health, emergency services and fire and rescue, and community infrastructure to ensure development is sustainable and contributes positively to existing communities. • Clearly and transparently set out an appropriate timescale for the delivery of new and improved infrastructure both phased appropriately, and which ensures development viability.
Chapter 4 Meeting our Growth Needs (the numbers and Spatial Strategy)			
Summary	ECC notes the stepped increase in the quantum of growth to be planned for and the potential sites allocations in Chapter 14 and the further evidence that has and is to be commissioned and refer BBC to the additional Evidence identified by ECC as listed above and on page 7. ECC will assist in the viable delivery of key services and the provision of infrastructure arising from planned growth within the borough and beyond, in the right location, at the right scale and time. ECC will assist in the viable delivery of key services and the provision of infrastructure arising from planned growth within the borough and beyond, in the right location, at the right scale and time.		
Para 4.9 Housing supply	Note BBC have undertaken an Urban Capacity Review, to identify a potential urban capacity of 3,300 new homes mainly within Basildon town. ECC recommend further work is undertaken for the Preferred Strategy to identify and allocate? as many specific sites as possible, to enable robust assessment of growth and more certainty for infrastructure viability, funding and phasing.	For BBC to engage ECC under the Duty to Co-operate, on the further site assessment, to identify the necessary site requirements and mitigation as part of the local plan evidence and Infrastructure Delivery Plan	This will form part of the development of the IDP to commence in May 25.
Policy SG1 Growth Needs	ECC note the stepped increase in the quantum of growth to be planned for and welcome the ambition in policy SG1 to align levels of growth and to meet the new standard method housing target in full within its administrative boundary. This approach is in accordance with the new NPPF and the Essex Planning Officers' Association (EPOA) protocols regarding unmet need (for Housing Needs and Gypsy and Traveller provision). This is supported subject to the outcome of the necessary additional supporting local plan evidence identified by BBC and ECC on page 7 above in accordance with the NPPF. • A Green Belt Review addendum to update the Green Belt study to align with the new NPPF Green Belt policies and approach to grey belt including plotlands (paragraphs 155 and 110, 111, and 115) to secure and deliver the cumulative infrastructure and service requirements from planned housing growth in sustainable and accessible locations. ECC maintain the need to release existing education premises (including playing fields) from the Green Belt to enable school enhancement and expansion projects to accommodate the growth and secure infrastructure without the need to demonstrate 'exceptional	ECC will work with BBC and seek timely and ongoing engagement on preparing the additional evidence as referenced here and on page 7 to inform the preferred strategy and pattern and distribution of growth in the right location, at the right scale for the growth to secure funding and delivery of the supporting local and strategic infrastructure, with infrastructure delivery strategies and mechanisms as outlined in NPPF paragraphs 155 and 156.	Agree

	circumstances'. ECC recommend that this is explored in a further Green Belt Review for compliance with the new NPPF. • The Cumulative infrastructure and environmental constraints appraisals (including transport, Education and flood and water management) to determining infrastructure and service requirements. • Clarification and consideration of the role of Green Infrastructure and biodiversity within the green belt land to be released, including undeveloped areas and relationship to the emerging Local Nature Recovery Strategy. • Review the approach to large scale developments, to include provision for a range of mixed uses including local employment areas, to support local sustainable patterns of growth as referenced in NPPF paragraphs 155. • Clarification on how BBC are to address Health and Wellbeing and Digital Connectivity within the BLP to ensure compliance with the NPPF. • To provide a list of ECC's and other policies and guidance relied upon by ECC services, for BBC to have regard to inform the preparation of the new local plan and planning applications. ECC will work with BBC and seek timely and ongoing engagement on this further evidence		
Policy SG1 Growth Needs	<u>Spatial Strategic and Cross boundary Matters to be Explored under the duty</u> ECC will work with BBC under the duty as outlined on page 6 on the necessary additional local plan evidence to inform the preferred strategy and site selection, requirements and policy wording. ECC recommend that the evidence and Plan is set in the wider strategic context. The following strategic and cross boundary matters remain relevant and have been extended in view of the level of growth and the number and location of potential allocations:- • ECC consider the potential site allocations to be of strategic and local importance for ECC infrastructure and services, in relation to potential implications and requirements given the range of locations, accessibility, viability, deliverability, funding, phasing and infrastructure and service matters and interdependencies to be considered. • Maintain the need for BBC to consider growth in the borough within the wider strategic South Essex context when considering spatial growth options across a range of strategic and cross boundary issues. For example the strategic importance of the A127, A13 and A130 including A127/A130 Fairglen Interchange (strategic transport corridors). and rail lines through the borough for South Essex; local network and barriers to north south connectivity; as well as education provision, flood and water management, minerals and waste. • Growth is also planned to the west and east of Basildon and are dependent upon these strategic transport links to support growth. BBC's	BBC and ECC to work together under the duty to explore and address the identified strategic and cross boundary matters, to inform the new Local Plan, supporting evidence base and IDP. This is to ensure that the new BBLP aligns with and secures and delivers the commensurate supporting infrastructure, as outlined above.	Agree to address under the DtC.

	emerging Plan and the selection of specific sites should be considered in this wider context. BBC to consider growth within a strategic context to fully examine and understand options that could deliver housing requirements and economic growth within Basildon borough while also supporting transport necessary to support growth over a wider area. • The transport evidence will need to consider the strategic implications of growth in the vicinity of the A13, A127 and A130 (and junctions). The implications of and approach to assessing potential sites as a whole rather than individually, to support effective delivery of transport vision with transport evidence and mitigation in that context. Sites to be fully assessed and comply with ECC transport policies, guidance and should have regard to the wider transport impacts arising from planned growth in South Essex. Consideration of the growth implications on the strategic function of the A127 with options explored in the strategic context with ECC, south Essex authorities and strategic partners including National Highways, under the duty (see chapter 8). • West of Basildon- Dunton Hills Garden Village (DHGV) in the Brentwood Local Plan and any potential developments around West Horndon such as the option in the emerging Thurrock Local Plan). ECC maintain a requirement for an East – West active and sustainable travel link to connect DHGV to Basildon and Basildon Town Centre. • Explore links to Thames Freeport and London Gateway • East of Basildon and South and East of Wickford –neighbouring emerging local plans in Castle Point BC and Rochford DC's and with regard to considering the need to safeguard land for proposed improvements to A127/A130 Fairglen Interchange. • NSIPs on and within BBC boundary to be considered including Lower Thames Crossing, Norwich to Tilbury, Oikos Port Facilities and Bradwell B) and with regard to the submission of joint responses and commissioning of evidence between ECC, BBC and partners. • To this end, any new large urban extensions (or settlements) apart from West Basildon (given links with Brentwood and Thurrock); near the boroughs. boundary should be delivered in the longer term given current constraints on the strategic road network (including Fairglen Interchange) and have regard to emerging local plan proposals and aspirations in Rochford, Castle Point, Chelmsford, Southend on Sea and Thurrock. • Increased densification within the urban area may provide opportunities for new development, however further evidence will be required on the impacts and mitigation on existing services and infrastructure capacity such as Transport, Education and flood management (including surface water).		

	• Recommended strategic growth options include and consider the wider contributions to biodiversity for example wildlife corridors within undeveloped greenfield land • Proposed release of Green Belt land on BBC's boundary consider sustainability and accessibility of the location and implications for neighbouring authorities. ECC recommend that the housing requirement for the Preferred Strategy allocates as many specific sites as possible (including within the urban area) to reduce windfalls. However, further evidence will be required on the impacts and mitigation on existing services and infrastructure capacity such as Transport, Education and flood management (including surface water) to identify and secure the necessary infrastructure requirements and interventions with more certainty with regards infrastructure funding, planning and delivery.		
Policy SG1 Growth Needs	ECC note the proposed 27,111 new homes includes a 5% buffer and suggest this is referenced and explained within the draft plan.	Expand the policy and reasoned justification for transparency	Agree to amend
Policy SG1 Growth Needs	<u>Gypsies, Travellers and Travelling Showpeople (GTTS)</u>. The Essex County Traveller Unit recommend that ECC note and support BBC policy to meet their local housing need in full as set out in the Basildon GTAA. ECC suggest BBC consider the new Planning Policy Statement for Travellers Sites (December 2024); and in respect of new provision for GTTPS sites, has regard to the Gypsy and Traveller and Travelling Showpeople Guidance within the Essex Design Guide, particularly the need to minimise incompatible uses.	Consider the requirements of the new PPS for Traveller Sites In planning new provision have regard to the Essex Design Guide / Gypsy and Traveler and Travelling Showpeople Guidance	A draft policy is being consulted on as part of Reg 18 Part 2.
Policy SG1 Growth Needs	<u>Education (EYCC, Primary and Secondary Education and SEND)</u> ECC refer BBC to IOCP response to Q23a entitled *"Education EYCC, Primary Secondary, SEND and Adult Learning"* within Section 4 Healthy and Sustainable Communities Question. This sets out the Lead local authority's recommendations for new and existing schools and their environment and ECC policy guidance, approach and requirements in planning for the provision of new (and expanded) Education facilities that BBC should have regard to. This information continues to apply subject to the following update in relation to SEND. It is too early for ECC lead local authority to provide detailed comments on education requirements. BBC will need to engage ECC to undertake a full education scenario testing as set out in ECC Local and Neighbourhood Planners Guide to School Organisation and the Developers Guide, and subject to locations, may need to have regard to growth in neighbouring authorities. ECC also recommend that the requirements on any large-scale developments have regard to and ECC's Garden Communities Guide to	BBC will need to engage ECC to undertake a full education scenario testing as set out in ECC Local and Neighbourhood Planners Guide to School Organisation and the ECC Developers' Guide to Infrastructure Contributions, and subject to locations, may need to have regard to growth in neighbouring authorities. ECC also recommend that the requirements on any large-scale developments have regard to and ECC's Garden Communities Guide to School Place Organisation. This will inform the EYCC, primary, secondary and SEND provision requirements. Recognise land required for infrastructure in site capacity calculations and allocate specific areas as F1(a) use class for new schools including SEND School and co-location with EYCC nursery and standalone EYCC nurseries as E(f) to establish viable land values.	• BBC is currently refining the draft allocations. In June 2025, BBC will supply the refined spatial strategy and housing trajectory to ECC to facilitate an updated educational need assessment. This will be incorporated into the IDP and, where justified by the IDP, allocation policies will specify education contributions and/or the allocation of land for education purposes. • Agree for allocations where land is released from the Green Belt land for educations use will be designated for F1(a) and standalone EYCC nurseries as E(f). Propose to amend HC3.3 to In order to ensure sufficient school place provision to align with growth, existing schools will be extended where appropriate. Suitable land will be allocated for education, designated F1(a) and childcare use, designated E(f) and provision will be secured.

	School Place Organisation. This will inform the EYCC, primary, secondary and SEND provision requirements. ECC can provide some initial high level observations on what a planned growth of 27,111 new homes in policy SG1 could generate in respect of EYCC provision, primary, secondary and SEND provision. The numbers are likely to be lower depending upon BBC's preferred strategy, size and location of developments, housing mix and consideration of existing education capacity and the potential for co-location and expansion of schools. Where land take is required for new education (and nursery facilities) this must be factored into the development area of the appropriate site allocation policy and land allocated within the development area being promoted for this use, to ensure it is viable. To clarify the appropriate land use classification for a new school is (Use Class F1(a)) with co-located early years and childcare nursery (Use Class E(f). • EYCC. the need for a maximum additional 3,240 new childcare places - the equivalent of 58, 56 place EYCC facilities (taking into account national changes to EYCC provision and requirements from April 2024. EYCC also support the provision of community facilities as part of Basildon Town Centre Regeneration (Policy R1), however, this should explicitly include reference to the provision for and access to EYCC as necessary supporting infrastructure and have regard ECC's requirements as set out in the Developers' Guide. • Education Primary and Secondary. Growth could be in the range of around 11 - 20 new primary and 3- 6 new secondary schools, depending on the level of planned growth, preferred strategy, sites and housing mix etc. The lower figure is informed by the spatial distribution presented by the Potential site allocations in Chapter 14. ECC also seek clarification in relation to the Green Belt and grey belt policies and recommend the removal of school sites from Green Belt in recognition of the potential need for school sites to expand in response to the level of proposed planned growth. • SEND. ECC recommend that the draft Plan expands the education references throughout to include the provision of SEND as part of the education offer. The proposed level of growth will necessitate a need to expand the SEND provision, based on the planned growth of 27,111 new homes, could create a need for a maximum of 460 SEND places, for children aged from 0-19 years, in accordance with the Department for Education (DfE) requirements for ECC as the local authority for Education. *The actual number of SEND places and provision is likely to be fewer once unit mix, and school expansion options are considered as part of the ECC Education Scenario testing. However, depending on the final spatial*		

	distribution, significant land-take for SEND provision must be factored in to the Local Plan if this number of new homes are to be delivered. This will be a combination of provision of new capacity within mainstream schools, and given the number of places generated, ECC will require land to be allocated within a new development for the provision of a new 200 place SEND school on 2.58ha of land to provide a new Special School. The location and areas of the new special school should comply with the Essex Developers Guide for Infrastructure Contributions – Appendix C "Education Site Suitability checklist. *ECC will be publishing a new ECC SEND Strategy imminently and are revising ECC's Developers Guide for Infrastructure Contributions, which expands on the above SEND requirements. ECC will work with BBC and wish to be engaged in the preparation of the new local plan to ensure that sufficient SEND provision is identified and supplied commensurate to the level of planned growth to be proposed, and that this is included within the Infrastructure Delivery Plan.*		
Policy SG3 Spatial Distribution of Growth	ECC suggest BBC re-consider how the policy is presented and relates to the potential housing allocations to ensure consistency and provide clarification, especially in relation to the Plotlands. For example within Policy SG3 North Benfleet features as a Plotland site for 35-50 dwellings, it is unclear if or how this relates to potential allocation H23 Bowers Gifford (Including Plotlands) for 840 or 3,000 homes. ECC seek clarification on how the Plotlands Study and ECC's response to the Bowers Gifford and recommend that ECC's consultation response to the North Benfleet and Bowers Gifford NDO consultation in 2023 informs the assessment of potential site H23 ECC seek clarification on how the land parcels are identified, for example H29 Ramsden Bellhouse Area forum is for c40 homes across a 220ha area. Suggest this is refined to reflect the bult development forming the village boundary.	BBC to clarify the approach and the findings of the evidence in the Plotlands Study and to have regard to ECC's response to the Bowers Gifford and North Benfleet NDO consultation in 2023.	Under review To clarify two options were consulted on for H23. Around 840 homes including the redevelopment of the Plotlands or a smaller allocation only providing around 300 homes. To discuss. H29 designated the Neighbourhood Plan Boundary Area. Allocations will be reviewed.
Para 4.29 and 4.31 Spatial Distribution of Growth	With reference to ECC's IOCP response to concerning the approach to development within the Plotlands (Q54 and Q55) and questioned how BBC will secure and deliver the supporting cumulative infrastructure and service requirements? ECC maintain these concerns having regard to the high level conclusions on the scale of growth and the infrastructure assessments and ECC seek clarification and engagement on how BBC will mitigate, secure and deliver the cumulative supporting infrastructure and service improvements for healthy and sustainable place making from piecemeal developments. ECC would not support proposals that could not secure the delivery of necessary supporting infrastructure and services.	BBC to clarify the approach and work with ECC to develop mechanisms to secure and deliver any necessary cumulative supporting strategic infrastructure and secure mitigation, funding and delivery (including land and developer contributions) with implementation and delivery from smaller piecemeal development.	Basildon Council notes ECC concerns. The Council is exploring potential to introduce a CIL levy in plotland areas to deliver necessary infrastructure. BBC will continue to engage with ECC under DtC on relevant matters.

<table>
<tr><td></td><td>ECC suggest BBC explore the potential for master planning these infill and plotland areas to set the framework and infrastructure requirements and a delivery mechanism to secure the necessary developer contributions from smaller piecemeal development. This reflects ECC in response to the Bowers Gifford and North Benfleet NDO in Feb2024 consultation.</td><td></td><td></td></tr>
<tr><td>Para 4.29 and 4.31</td><td>In respect of biodiversity, whilst the Plotlands Growth Potential Study was conducted prior to the Essex Local Nature Recovery Strategy (LNRS) consultation, LPAs were consulted on potential strategic opportunity areas for Local Nature Recovery during the mapping process. It is understood that Basildon has submitted a few sites for consideration. Have the site allocations for growth taken into account the strategic opportunity areas identified in the Essex LNRS?

Although, if a development is allocated on a LNR opportunity site, it does present an opportunity where it must adhere to guidelines that support nature recovery goals. This includes achieving at least a 10% net gain in biodiversity, protecting and enhancing existing habitats, and collaborating with local planning authorities and stakeholders. Sustainable practices in construction and operation are also essential to minimise environmental impact, ensuring the development contributes positively to the environment and supports broader biodiversity enhancement goals.</td><td>BBC explore opportunities for Biodiversity within the context of the emerging LNRS and engage ECC as a lead LNP partner.</td><td>The LNRS will inform refinements of the potential draft allocations. Basildon Council is currently awaiting GIS boundaries of LNRS.

Proposed actions

• Map LNRS opportunity sites against draft allocations.
• Where there is conflict agree to a) amend allocation boundaries to exclude LNRS, b) agree to retain in site boundary but exclude LNRS from developable area by policy requirement.
• Engage with ECC on proposed amended allocations.</td></tr>
<tr><td>General Comment</td><td>Balancing housing growth with access to green space is essential. Green spaces provide numerous benefits. ECC seek clarification on whether BBC have commissioned an Open/ Green Spaces Study to support plan preparation and balance of new development and nature recovery?

ECC can advise that the Greater Essex Growth and Infrastructure Framework 2016-2036 outlines the provision standards for various types of green space in Basildon per 1,000 new residents. Despite Basildon having a larger number of green and blue infrastructure assets, its residents have less access to natural and semi-natural green spaces and allotments compared to the Essex average.
<table>
<tr><td>Hectares per 1,000 population</td><td>Natural & Semi-Natural</td><td>Parks & Gardens</td><td>Amenity Garden space</td><td>Allotments</td></tr>
<tr><td>Basildon</td><td>2.62</td><td>1.82</td><td>1.33</td><td>0.05</td></tr>
<tr><td>Essex Average</td><td>3.45</td><td>1.58</td><td>0.89</td><td>0.22</td></tr>
</table></td><td>ECC seek clarification on BBC’s approach and evidence to balance new development and nature recovery.</td><td>Policy HC2 as part of the Draft Local Plan consultation Reg 18 Part 2 covers matters relating to ‘Public Open Spaces, Local Green Spaces, Sport and Recreation’.

Access to natural and semi natural space is in line with other major urban population centres in Essex such as Chelmsford, Southend and Thurrock.

An updated Open Space Study will take place in 2025.</td></tr>
<tr><td colspan="2">Chapter 5 Building a Strong and Competitive Economy</td><td></td><td></td></tr>
<tr><td>Chapter 5</td><td>ECC recommend BBC reconsider the approach in policy E1, to specifically include details of the range and distribution of employment land to align the supply and type of employment land with the range of employment needs. For example, strategic or local need covering office, advanced</td><td>Review the approach to policy E1.

Changes and clarification on policies E2 and E3 and to engage ECC on the emerging Employment land Review and alignment with the Sector Development Strategy.</td><td>Under review</td></tr>
</table>

	manufacturing, grow on space, or low density employment uses such as storage and distribution. Further changes include reference to sui generis uses to ensure consistency with policies E2 and E3 and seeking engagement on the emerging Employment Land Review (which may provide context to the above comments) and alignment with the Essex Sector Development Strategy. ECC suggest BBC consider the need for a new policy concerning their expectations from new employment areas such as the mix of employment, floorspace, provision of affordable start up accommodation and grow on space. Other elements to be explored, as set out in ECC's response to IOCP include reference to opportunities to address under-utilised existing employment areas and other opportunities including Ford Dunton, as well as links to the provision of skills and Post 16 infrastructure, as explored with South Essex Councils. It is also recommended ECC welcome the approach to skills and training however recommend this is extended to include enhancements in relation to skills, training and apprenticeships and specific requirements for provision of Employment and Skills Plans. ECC recommend any large scale planned growth in and around Billericay and Wickford, seek to align housing and economic growth, for example the provision of a mix of uses including provision of appropriately sized new local employment areas, in accordance with new NPPF paragraph 110 – 111. In respect of Town Centres ECC support the creation of a diverse mix of town centre uses, with a wider range of employment opportunities including for example the provision shared office space, and opportunities for start-ups/ grow on space.	Provide a breakdown of the Employment land requirements within policy E1 and explore opportunities to address under utilise existing employment areas. Expand requirements to secure Employment and Skills Plans. Include some local employment sites with the large potential site allocations to align growth and provide a mix of employment.	
Policy E1	ECC Recommend policy E1 recognises that attainment starts with quality Early Years and Childcare and pre-school based education to enable the best start in life and that wrap around provision will support working parents. Reason: ECC draws attention to the Childcare Act 2006, which gives ECC the statutory authority to ensure there is sufficient high quality and accessible early years and childcare places within the local area. Section 6 of the Act defines 'sufficient childcare' as sufficient to meet the requirements of parents in the area who require childcare in order to enable them to take up, or remain in, work or undertake education or training which could reasonably be expected to assist them to obtain work. Unlike education, parents can choose to access childcare away from their home area, for example near to a place of work or training.	Refer to facilitating improved early years and childcare pre-school and statutory age education infrastructure.	Under review
Policy E1a and Para 5.17	ECC as the MWPA welcome the reference to sui generis uses within paragraph 5.6 and 5.8 which is consistent with policy E2 and in compliance with adopted WLP (policy 4), however there are no reference to sui generis uses within policy E1 or paragraph 5.17, to create an inconsistency with the text and policy E2 and WLP.	Changes to policy E1 part a to read: a. *Protect and enhance existing employment areas as set out on the policies map to meet the needs of existing and new businesses, including the protection of land specifically for ~~B1~~ E(g)(i) office, B2 industrial and storage and distribution uses*	Agree to amendment

	ECC recommend changes to policy E1 part (a) and paragraph 5.17 to provide clarity and consistency. Update Part a references from B1 office to E(g)(i) office to align with the Use Class Order.	*and other sui generis uses of similar employment natures, in line with Policy E2*	
Policy E1, part b	Omission - Suggest BBC include provision for grow on space, and have regard to the South Essex Grow on Space Study (2020).	Change as recommended. Change Policy E1 b. to read Make provision for 65-82ha of land to deliver additional employment development for office, industrial and storage and distribution uses. *As part of this provision, specific sites will be secured for the delivery of grow-on space for emerging businesses.* ***Change Para 5.17 to read:*** *5.17 …. port existing business sectors. Policies should also set criteria or identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the Plan period and to ensure compliance with the development plan for the borough including the Adopted Essex Minerals Local Plan and Adopted Essex and Southend on Sea Waste Local Plan. This will help to promote the development of clusters or networks of knowledge driven, creative or high technology industries, and for storage and distribution operations and other employment generating sui generis uses at a variety of scales and in suitably accessible locations.*	Under review
Policy E1 Part f and g	Bullets f and g Welcome bullet f and g regarding the importance to skills and education for training, and the workforce, however, recommend the policy and supporting text is changed to recognise the importance of early years and childcare and that the quality early years and childcare provision will enable the best start in life and that wrap around provision will support working parents.	Expand the policy E1 to recognise the importance of facilitating improved early years and childcare provision to skills, education and training and the workforce.	Agree to amend.
Policy E2 and E3	ECC as MWPA refer to our IOCP Prosperous Economy (Q35) regarding the requirement of WLP policies 2 and 4 and the need to safeguard Waste Management uses and to avoid conflict with the adopted polices from potential bad neighbour uses. The MWPA has reviewed the Potential Site Allocations as set out in Appendix 2 of the Draft Plan, and have identified a number of potential site where BBC will need to undertake Minerals and Waste Policy Site Compliance Assessments to ensure compliance with the adopted MLP and WLP. ECC will work with BBC in undertaking any necessary assessments.	BBC to undertake Minerals and Waste Policy Site Compliance Assessments on the Potential Site Allocations as part of the local plan evidence base. ECC as the MWPA will need to be engaged in the process and can provide further advice.	This will inform refinements of the potential draft allocations. Proposed actions • Map Minerals and Waste Policy Site opportunity sites against draft allocations. • Where there is conflict agree to a) amend allocation boundaries to exclude Minerals and Waste Policy Site and any appropriate buffer, b) agree to retain in site boundary but exclude from developable area by policy requirement. • Engage with ECC on proposed amended allocations.
Policy E2	With regard to the above, ECC question why the Courtauld Road Waste Management site has been removed from the policies map as existing Employment Land and consider the approach inconsistent with the adopted	Change to retain the land as existing employment use and BBC to work with ECC to clarify the position.	Under review

	Essex and Southend on Sea Waste Local Plan 2017 Local Plan policies 2 and 3, and the draft BLP Policy E2 and supporting text. Further policy 3 of the WLP allocates site W20 as a strategic site for waste management and the draft Plan is currently inconsistent with this allocation.		
Policy E3 part 2 Changes of Use of Employment Land or Premisses	The second part of Policy E3 relates to net loss of employment land or floorspace. ECC suggest applicants should be required to take a medium- to long-term view when demonstrating a site is no longer suitable, viable or appropriate for employment purposes. For example, policy could require that applicants: • Recognise the point in the economic and property market cycle, recognising potential upsides and downsides in the short, medium and longer term • Consider how planned economic development initiatives, infrastructure and regeneration projects may affect demand • Recognise that historic take-up rates are often limited by inadequate supply (quality, quantum and affordability) and consider alternative evidence of demand such as known occupier requirements, enquiries received, waiting lists for multi-let space • Consider vacancy and availability of space, recognising that lease terms and affordability can limit suitability of available space for occupiers • Consider the development pipeline locally, recognising that planning permissions do not always turn into delivered floorspace • Outline marketing activity to date, recognising that interest will be stronger as the scheme becomes more developed, time moves nearer to completion of the floorspace / post-completion, and the location becomes more established • Set out feedback from market engagement, and the options considered to improve deliverability (e.g. revising specification of spaces / mix of uses, early delivery of a critical mass of floorspace, design to mitigate impacts on neighbours) • Make clear what support has been sought from the public sector to address identified market failures ECC suggest BBC review policy wording for clarification, as present the wording appears to requirements to “consider opportunities” restricts “infrastructure improvements” to within the designated employment area. ECC suggest this is revised to provide certainty on how the impact of the development will be addressed and the expectation for the impacts to be fully mitigated.	Recommend BBC review the policy to require to take a medium- to long-term view when demonstrating a site is no longer suitable, viable or appropriate for employment purposes, and to clarify what is being required and how it relates to Policy E1 part c.	
5.30 and 5.31	ECC suggest a generic reference to ‘apprenticeships’ and that BBC outline full ask in respect of requirements for training opportunities, apprenticeship, work placements and school engagements etc in the supporting text. This should include requirement for the provision of Employment and Skills Plans (ESP) or financial contributions, as referenced within Policy E6.	Suggest refer to section 5.4 in ECC’s Developers Guide and the text within this regarding requirements for an ESP.	
Chapter 7 Meeting our Housing Needs			

Chapter 7	ECC has responsibilities under the Care Act 2014 as the Care Authority, and welcome and support housing policies HOU1 and HOU2 covering the provision for the size, tenure and quality of housing and requirements for the provision of Accessible and Adaptable dwellings (and for wheelchair users) in all strategic housing allocations, with reference to ECC's response to the 2023 IOCP. ECC support the provision of new homes to meet local needs, including the affordable housing requirement for 10,420 affordable homes, which should include a range of homes and affordable tenures that meet the needs of residents including older people and adults with disabilities. ECC suggests the type of affordable housing will need to be reviewed against the revised NPPF. ECC seek engagement with BBC to ensure the right range of specialist and supported and specialist housing is provided across the borough to meet both current and future need and ECC recommend strengthen and clarify their approach including ECC's emerging bespoke evidence with Housing LIN. ECC will share the emerging data with authorities (including BBC) in early 2025 and this can inform the housing policies.	Review HOU2 provision of Affordable Housing in view of revised NPPF. Modifications are sought to policy HOU3 to ensure references and housing policy requirements for supported and specialist housing (SSH) are not limited to older persons. National policy highlights that need and provision of housing must address other cohorts. SSH is needed to meet the housing needs of a wide variety of residents with different housing needs including supported living for adults with disabilities (including mental health needs, extra care, sheltered housing and care homes) and all ages including looked after children. This will ensure compliance with national policy and guidance. ECC recommend a clear definition of SSH is included in the Plan's glossary. ECC can advise on appropriate wording.	To review alongside response to revised HOU2 Reg 18 Part 2. HOU3 will be revised to reflect new evidence prepared by Housing LIN expected July 25.
Policy HOU1	ECC Welcome policy HOU1 and suggest the following changes **Part 3** Support and refer BBC to the ECC's Housing Strategy 2021-25 regarding new homes and places are designed for residents to live independent and healthy lives **Part 4** Support. There is a significant need for M4 (3) properties as stated ECC's response 2023 IOCP and ECC suggests a minimum of 10% of all homes to meet the M4 (3) building standards and suggest an approach to ground floor flats on all general flatted housing schemes where feasible meet this standard would be supported as not all disabled people are aged over 55 years ECC support policy that prioritises M4(3) wheelchair adaptable standard within affordable housing tenures as there are more people with poor health, mobility and disability living in social or affordable rented homes. See Disability and housing, UK - Office for National Statistics. Suggest such homes are designed to be 'care ready' and will prevent the need for expensive adaptations as people's health and mobility deteriorate. Such homes also help delay premature moves to residential care schemes that are expensive for the occupant and taxpayer. **Part 5** The delivery of self-build plots is supported in diversifying the housing market and increasing consumer choice. Provides opportunity to support innovative construction, delivered with environmentally sustainable and energy efficient measures. There is also an opportunity to support sites to	Part 1 suggest change to 10% and consider the approach to ground floor flats to meet this standards and have regard to Disability and housing, UK - Office for National Statistics	New supporting text 6.3 It will support the delivery of the priority 1 of the Basildon Council's Housing Strategy 2023-2028 to improve access to housing opportunities and choice and Essex County Council's Housing Strategy 2021-2025 which sets out opportunities to deliver new homes and places which are designed for residents to live independent and healthy lives. New evidence for specialist and supported housing has been commissioned and is expected to be delivered in July 202. This will inform any amendments for M4(3) properties.

	come forward for Community Led Housing Groups. See Community Led Housing Archives - Housing Essex for examples of self build by community led housing groups. **Part 6** Support the policy to ensure all new homes are designed to meet the nationally described spaces standards across all tenures.		
Policy HOU2: Affordable Housing	ECC support policy HOU2 and the delivery of 10,420 affordable homes. ECC, as the Care Authority would support a range of homes and affordable tenures that meet the needs of residents who are older people or live with a disability. **Part 2** Refer to ECC's Housing Strategy 2021-25, which includes an outcome that - The number of new homes meet local needs, including for affordable homes and we therefore support the 50% of affordable homes requirement on sites of 10 or more homes where land has been released from Green Belt land. **Part 4.** Support. Suggest BBC consider how Build to Rent schemes contribute to overall housing offer on strategic sites alongside other tenures to provide more diverse housing options to best meet local need e.g. to meet affordable housing tenure mix Policy HOU2:3, and can support swifter build out. **Part 9** Support the policy to promote high quality affordable housing, which reflects best practice. Suggest consideration of location of and a maximum number of dwellings per cluster for affordable homes that are not contiguous on larger sites to ensure schemes deliver mixed tenure and balanced, sustainable communities. **Part 11b** Support ECC would welcome a discussion with BBC officers.	HOU2 – Explore a range of homes and affordable tenure that meet the needs of residents who are older people or live with a disability. Part 2 – Have regard to ECC's Housing Strategy 2021-25. Part 4 – consider how build to rent schemes contribute to the overall housing offer. Part 9 – consider the location of and maximum number of dwellings per cluster for affordable homes. Part 11b – Engage ECC officers.	To review alongside response to revised HOU2 Reg 18 Part 2. Part 9 – There is a need to balance delivering mixed communities with delivering affordable housing which can be effectively managed by the Registered Provider. The policy requirement that affordable housing is: 'integrated throughout the development except where it can be demonstrated that grouping together affordable dwellings is necessary to limit service charges and/or facilitate management of the units.' Seeks to balance these needs. For 11b below, BBC requests clarification on discussion. 11 On all other sites, viability will be considered on a case-by-case basis. Viability Assessment. Where a lower provision is justified: a) Affordable housing will be required at the level and tenure mix where the development becomes viable, and b) Early and/or Late-Stage reviews of viability up to policy compliance will be secured by the Council through legal agreement.
Policy HOU3: Specialist housing for Older People	Welcome the provision of supported and specialist housing (SSH) for Older People, however, recommend the policy is expanded to provide SSH to meet the housing needs of a wide variety of residents with different housing needs including supported living for adults with disabilities (including mental health needs, extra care, sheltered housing and care homes) and all ages including looked after children. ECC do not support the Housing LIN SHOP tool and it is no longer endorsed by the Housing LIN. ECC is working with Housing LIN on a bespoke forward forecasting project to identify the need for specialist and supported housing (including care home provision) across the County, including Basildon. This forward forecasting will provide a robust evidence base, as well as any new and emerging data. This information will be available early in 2025 and will be shared with all local housing authorities, including Basildon. **Part 2** Please be advised ECC Adult Social Care no longer recognise enhanced sheltered housing as an older person specialist housing type. If this is to be included it needs to be clearly defined.	Policy HOU3 – Expand the policy to cover the provision or Supported Specialist Housing Neets for all cohorts. ECC will shard the emerging data from our new bespoke Housing Lin Forecasting project. Part 2 –Clarify the position regarding Sheltered Housing. Part 3 –Review the Care Home requirement across the borough. Part 4 –Engage ECC as the Care Authority to ensure SSH to ensure the right SSH is provided across the borough. Insert a New Part 5 to introduce a Design Guide and have regard to ECC's Extra Care Design Guide (2023) BBC to require HIA's for specialist and supported housing for older people and other housing within the C2 use class,	Proposed to engage with ECC when updated evidence is available (est end June). Policy HC1 requires a Health Impact Assessment for all development in C2 residential use class and all development delivering 50 or more homes.

	Part 3 Recommend the care home requirements across the Borough need to be reviewed to reflect the changing aspirations of people as they age, with more people wishing to remain at home for longer, with technology and health care developments making it easier to provide more care at home. **Part 3 b)** Suggest clarify "Where directed by the Council discussions should". Part 4) ECC as the Care Authority welcome the opportunity to work BBC to ensure the right specialist and supported housing, including supported living for adults with disabilities, including mental health needs, extra care, sheltered housing and care homes are provided across the borough to meet both current and future need. New Part 5 Add a new part to address Design Requirements and recommend this includes having regard to ECC's Extra Care Design Guide (2023) or any subsequent updates and where possible that affordable extra care housing is designed in line with the design guide. ECC recommend a Health Impact Assessments should be required for the Specialist Housing for Older People having regard to the Essex Design Guide Healthy Places Guidance – requiring this for C2 use class.	having regard to the Essex Design Guide Healthy Places Guidance.	
Para 6.28	Recommend BBC update the evidence base for SSH need requirements with regard to the new bespoke Essex forecasting project and emerging data. ECC support the provision of specialist care and extra care facilities. Our Market Position Statement (MPS) says the residential care home market is currently 'oversupplied' and our Ambition is to 'decrease supply'. Our Market Shaping Strategy (MSS) says the same (noting both MPS and MSS referenced in the 'Local Account') … 'We want to see fewer people admitted into long-term residential care. This has implications for a market sector, where there is already over-supply of care home beds. It also has implications for supported living and domiciliary care, where we want to see greater choice and capacity. We want people with people with complex care needs who require greater levels of support, often in a residential care setting, to have needs met in Essex. Our strategic action is to 'develop support and investment to increase Supported Living and Extra Care'. Two key measures of success will be 'A reduction in permanent admissions to residential care' and 'A reduction in the supply of care home beds It would be beneficial for specialist care accommodation to be located closer to the centre of communities or developments, so that they are not isolated from the community, and this provides better access to transport and shops etc.	BBC and ECC to work together and have regard to ECC's emerging Forecast project and ECC's Market Position Statement. BBC to work with ECC as the Care Authority to ensure the right specialist and supported housing, including supported living for adults with disabilities, including mental health needs, extra care, sheltered housing and care homes are provided across the borough to meet both current and future need. Consider the location of specialist care accommodation.	Proposed to engage with ECC when updated evidence is available (est end April).
Chapter 6 Ensuring the vitality of town centre			
Chapter 6	ECC note the proposals to prepare a new Basildon Town Centre Masterplan and inclusion of necessary infrastructure including public transport, walking and cycling, green spaces. ECC seek ongoing engagement as an infrastructure and service provider including clarification		

	and engagement on the nature and scale of growth to be planned new commercial and residential spaces and provision of necessary infrastructure (e.g. Transport, SuDS, education including Adult Community Learning, libraires and affordable housing such as SSH). ECC welcome the initial engagement on the Masterplan and seek engagement in relation to potential co-location of Essex Libraries and ACL within Basildon Town Centre, as previously raised and refer BBC to the revised NPPF paragraph 101 regarding the provision of new and expanded public services including libraries and adult education. Further changes and clarification is sought in relation to securing community facilities (including EYCC, Education, Skills) as part of healthy place making principles for existing and new residents (including the need to create for a policy health and wellbeing approach towards takeaways/fast food outlets to create a healthy food environment as set out in Chapter 10), surface water management, urban greening and proposed on the mechanisms to "maintain" infrastructure.		
Para 7.3 Retail and other Town Centre Uses	ECC as the lead advisor authority of Essex for Public Health (PH) support a broader mix of uses within town centres including leisure, cultural, health and wellness, community facilities and services to help deliver sustainable economic recovery. There is a need to address issues of health and obesity and impact of takeaway/fast food restaurants on town centres, which limit the diversity of the town centre by limiting the range of takeaways and fast food outlets and create healthy food environments. ECC recommend the policies R1 – R5 include the requirement for Health Impact Assessments and ECC separately recommend a new strategic policy on Health and Wellbeing which would include the framework for Health Impact Assessments (see Chapter 10). ECC as PH advisor wish to work with BBC to expand the policies R1-R5 and to embed Health and Wellbeing throughout the local plan to create positive healthy environments. Reason: To realise the Vision and Strategic Objectives of the draft Plan and the findings of the IIA Strategic Objective 2 and Appendix B-B180 regarding town centres and to ensure compliance with the NPPF.	To work with ECC as PH advisor to expand Policies R1 policies R2 – R5 to include provision for Health Impact Assessments.	To consider with response to Reg 18 part 2. Policy HC1 requires health impact assessments for: a. Health Impact Assessment (HIA) for proposals of: i) 50 or more dwellings; ii) all development in Use Class C2 (Residential Institutions); iii) all non-residential developments delivering 1,000 square metres or more gross internal floor space; and iv) '*sui generis*' hot food takeaways
Para 7.14 Retail and other Town Centre Uses	ECC welcomes the reference to the role of a well-designed and multi-functional public realm but recommends expanding to include the need for urban greening to enhance climate resilience, improving air quality, and mitigating flood risks.	Change to read …. *"The role of a well-designed and multi-functional public realm is an increasingly important feature of a successful town centre, contributing to urban greening, visual interest and climate change ….*	Agree
Para 7.19 Policy R1 part 2	Welcome the reference to *"community facilities"* in paragraph 7.3 and suggest this and other changes for clarification and consistency with paragraphs 7.3, 7.20, policy R2 and infrastructure policies INF1-3. This will enable BBC to secure contributions for the necessary supporting infrastructure for the new residents, including early years , education, and skills. ECC recommend changes to paragraph 7.19, Policy R1 part 2 (and bullet 2) and further changes to Policy R1 part 3.	Change para7.19 to include a new bullet to *read:* • *Community facilities (eg early years and childcare, education and skills)*	Agree

Policy R1 Part 2, Part 3	As outlined in 7.19 above ECC recommend changes to Policy R1 part 2, part 3 and part 4 for clarification and consistency with paragraphs 7.3, 7.20, Policy R2 and infrastructure policies INF1-3, to enable BBC to secure contributions for the necessary supporting infrastructure and service improvements.	Change Policy R1, part 2 to read: *The character and quality of the town centre will be protected and enhanced through the promotion and careful control of new development. To protect, support, and where necessary regenerate, the secondary tier of centres and Local Centres to ensure they continue to cater for the needs of the communities they serve, ensuring their own continued vitality.* - *Bullet 1 contributes to the Town Centre's diversity, vitality, viability and environmental and health quality* - *Bullet 2 provides a mix of uses which may include retail, residential, employment, recreational, leisure, civic, cultural, community and health facilities.* - *Bullet 3 contributes to its role as a public transport hub for the borough;* - *Bullet 4 creates a high quality, healthy, distinctive and well-designed environment and public realm that helps reduce crime and the fear of crime;* - *Bullet 5 provides necessary infrastructure including public transport services, pedestrian, ~~and~~ cycling and wheeling facilities, green spaces/Green infrastructure, SuDS, Community facilities and affordable housing;* Change Policy R1 Part 3 to read - Bullet 1 Diversifying Basildon Town Centre through the introduction of new commercial and residential uses to meet the needs of residents living in the town centre with a range social and community facilities and to attract more people throughout the day and to meet the changing demands of town centres. - Bullet 3 The desire to strengthen connectivity by providing improved routes for pedestrians, cyclists and public transport that are high quality, legible, attractive and safe - Bullet 6 *The value of good urban design and urban greening ~~infrastructure~~ to improve health and environmental quality and resilience to climate change for the town centre.* Suggest Part 4 should focus on maintaining the supporting infrastructure *Change part 4 to read* *New development will be expected to make a reasonable and proportionate contribution to the cost of providing and maintaining necessary supporting infrastructure, including walking and cycling access, public transport, the public*	Under review

		realm, green infrastructure, community facilities and on key highway links and junctions which serve Basildon Town Centre.	
Policy R3 Part4, bullet 2	ECC recommend include provision of internal space to segregate recyclable material to support delivery of the circular economy.	Change to read *provision of internal space to segregate recyclable material and a separate recycling and waste store is expanded*	
Chapter 8 Sustainable Transport and Infrastructure			
Transport Summary	An overview of ECC's transport position within the wider South Essex context should be provided and considered in preparing the draft Plan, which outlines the importance of strategic transport corridors (A127, A13 and A130 including junctions) and rail lines through the borough connecting South Essex from Southend to London and the M25. There is a need to have regard to the additional growth also being planned to the west and east of the borough; NSIPs including the Lower Thames Crossing; timing of major road network improvements on the A127 (including the A127/A130 Fairglen Interchange); the importance of A13 and Sadlers Farm Roundabout; the A127 Enterprise corridor to the borough; as well as the local transport network. ECC maintain the validity of responses to the IOCP (copied in Appendix 1) and provide an update in the context of the existing and emerging Essex Local Transport Plan and transport strategy, ECC highways policies and standards, revised NPPF including the approach to vision led transport planning and requirements for the new sites within the Green Belt to be in sustainable and accessible locations. ECC's preference is for high density development around transport hubs and local services to optimise active and sustainable travel infrastructure and services in accordance with the NPPF and as promoted in new ECC Transport Hub Guidance. ECC place importance on the need for the transport components of the draft Plan, such as site selection and design are led by a transport vision based upon ECC's established transport strategy and policies in place and in preparation, and in alignment with Transport East, including the approach to any new and existing junctions on strategic transport routes. It is too early for ECC to provide detailed comments on potential sites, as their individual and cumulative impacts will be informed by the transport evidence. However, it is likely that sites to the West of Basildon will require active and sustainable links to the neighbouring DHGV, sites to the north and east of Basildon will need to consider the adjacent strategic road network (including any future improvements), and there may be other congested hotspots requiring careful consideration e.g. Sun Corner, Billericay. These areas are highlighted as they were reviewed as part of the wBLP. There will be additional sites to be reviewed as part of the new plan, informed by the transport evidence, including assessment of the full extent of growth within the urban area. BBC should have regard to the strategic importance and function of the A127, A130 and A13 in South Essex and development proposals potential impacts upon these routes should be considered in a strategic South Essex context. ECC's position has been consistently not to allow additional accesses on to the strategic routes for safety and congestion reasons, this will be kept under review. For example, the land proposals north of Basildon (town), should be considered in the context of maintaining the strategic function of the A127. The potential allocations in this area in part co-join Basildon with Wickford and Billericay and could reduce options for future improvements to the A127, for example to re-route the A127 to the north, an alternative option may be to re-route traffic to the A13/A130 and down grade the A127 to increase access. To be explored in the wider strategic context with ECC and strategic partners. Sites adjacent to the strategic transport corridors, such as the A127 should be considered as a whole in a comprehensive manner rather than as individual sites to support the effective delivery of the transport vision. Planning transport provision across several sites to ensure join-up implementation of co coherent active and sustainable infrastructure and services is more likely to provide affordable and convenient transport for new and existing residents, enabling deliver of transport that is sustainable for the long term.at a strategic cross boundary scale and hence any potential site allocations will need to be supported by transport evidence and mitigation considered within that context.	

	ECC welcome the Strategic Transport policy (STAT1) as an overarching policy, subject to suggested changes, including emphasis on active and sustainable travel, travel plans, electric vehicle facilities, and need to ensure greater emphasis is placed upon new development being proposed in sustainable and accessible locations, supported by sustainable transport, in accordance with revised NPPF (paragraphs 110 and 115 and in relation to Green Belt paragraphs 155 and 156). ECC suggest the need for further policies in the next iteration of the Plan, such as development management transport policies, and identification of strategic transport schemes to be delivered; and provide an update on emerging ECC and other transport plans, strategies and guidance.	
	ECC welcome the commencement of the ARUP Transport Evidence which will be critical in addressing both the strategic and cross boundary transport matters raised below (not just localised improvements), and to inform the Strategic Growth Options Cumulative infrastructure and Environmental Impact Assessments, to ensure the preferred strategy and site selection consider growth in the wider strategic South Essex context in relation to transport and to comply with the new NPPF. ECC seek engagement on the identified matters below and raise and maintain ECC's Transport comments as presented in response to the 2023 IOCP consultation which remain relevant. The information presented below is set out as follows: 1. Setting a Transport Vision for the Basildon Local Plan 2. Transport East Transport Strategy 3. LTP 4 4. Transport Vision 5. South Essex Context 6. Transport Evidence (with reference to A127, A13 and A130 Corridors (including junctions), Fairglen Junction area and Sadlers Farm junction, other transport infrastructure and Air Quality) Draft BBLP Additional points of detail	BBC agrees the ongoing engagement with ECC under DTC as transport modelling progresses. Next step meeting with Arup 29/4/2025. Local Model Validation Report issued 11/6/2025.
/	**1. Setting a Transport Vision for the Basildon Local Plan** ECC would like to highlight the requirements of our current Local Transport Plan and related policies, as well as the developing new version. It is important that the transport components of the Basildon Local Plan, including site selection and design, are led by a transport vision based upon established transport strategy and policy in place and in preparation in Essex that seeks to ensure that greater emphasis is placed upon sustainable development, and the provision and use of sustainable transport. **Transport Strategy in Essex: LTP** ECC is the Transportation Authority and Highways Authority for the administrative area of Essex. The Local Transport Act 2008 requires Transport Authorities to develop a Local Transport Plan (LTP) that includes policies for the promotion and encouragement of safe, integrated, efficient and economic transport facilities and services to, from and within their area, that are required to meet the needs of persons living or working in the authority's area, or visiting or travelling through that area, including those required for the transportation of freight. This requirement is addressed by the Essex Transport Strategy that was formally adopted by ECC in 2011. This document is ECC's third Local Transport Plan (LTP3). **Existing LTP policy** LTP3 is outcome focussed and has a stated vision to create "a transport system which supports sustainable economic growth and helps deliver the best quality of life for the residents of Essex." To enable the delivery of this vision, the LTP contains a suite of 15 transport policies that apply throughout Essex. Development located within Essex is expected to comply with the policies contained within the LTP and to support the delivery of its wider strategic aims. The policies of most relevance to development are as follows: **Policy 2 – Integrated Planning**. Transport and land-use planning will be used together to secure new development at the most appropriate and sustainable locations by: • working closely with district planning authorities to enable a better balance of new homes, jobs and services; • locating new developments in areas which are accessible to key services by sustainable forms of transport;	Noted. This will inform development of the policy and ongoing engagement.

	• ensuring new developments provide for sustainable transport and effective travel planning; • requiring new developments to provide appropriate transport infrastructure in line with the Council's current development management policies; • making the most effective use of all available funding sources by coordinating the delivery of ECC and development funded works. **Policy 7 – Carbon Reduction**. ECC will support and encourage the use of lower carbon travel by: • promoting the use of more sustainable forms of travel (Policy 8); • ensuring new developments minimise the number and length of trips made by private vehicles (Policy 2); • supporting use of emerging low-carbon technologies to reduce carbon emissions from transport sources; • ensuring the Essex road network operates efficiently to minimise CO2 emissions from vehicles; • adopting measures to improve energy efficiency and further reduce carbon emissions arising from our own activities. **Policy 8 – Promoting Sustainable Travel Choices**. ECC will encourage the use of more sustainable forms of travel by: • consistently supporting and promoting sustainable travel; • providing infrastructure for sustainable transport; • working with partners and service providers to promote the use of sustainable forms of travel and to identify new ways to provide services; • requiring effective travel planning for proposed developments in line with the Council's current development management policies; • developing effective travel plans with existing workplaces, schools, and other locations that attract a significant number of people; • promoting access by sustainable forms of transport to the county's railway stations, ports and airports. **Wider policy context** While LTP3 remains the statutory transport policy document for Essex, these policies should be interpreted in light of significant changes to the national policy backdrop and the production of new standards that prioritise sustainable development, place greater importance upon the provision and use of sustainable transport, and commit the UK to the decarbonisation of the transport network by 2050. These are reflected in key policy documents as follows: • The 2018 Road to Zero, the Government's carbon reduction strategy for road transport and the publication in July 2021 of the Transport Decarbonisation Plan. • The Future of Mobility: Urban Strategy 2019 and the complementary rural strategy, Future of Transport: supporting transport innovation. • Publication of Gear Change, the Government's vision for walking and cycling, and new guidance on the design of cycle infrastructure. • New approaches to rail and bus service delivery contained within Bus Back Better, including the introduction of Bus Service Improvement Plans (BSIPs), and the Williams-Shapps Plan for Rail and the government's Railways Bill. • The announcement by the government on 28th Nov of an Integrated National Transport Strategy for England putting people and communities at the heart of transport provision. • The review of NPPF and its focus on "Vision led" transport planning. **Essex climate action commission** The Essex Climate Action Commission was set up by ECC to provide independent advice on tackling climate change. In July 2021 the Commission published its Net Zero: Making Essex Carbon Neutral report. In July 2023 Essex County Council adopted a new Climate Action Plan. This plan defines the approach necessary for Essex to achieve net zero carbon transport emissions by 2050 • Avoid unnecessary motor vehicle trips. • Shift to sustainable modes such as walking, cycling and public transport. • Improve the efficiency and sustainability of those journeys which are essential.	
	2. Transport East transport strategy	Noted. This will inform development of the policy and ongoing engagement.

	Transport East is the sub-national Transport Body for Norfolk, Suffolk, Essex, Southend and Thurrock, formed in 2018 as one of seven Sub National Transport Bodies that together cover all of England outside of London. Transport East's role is to set a regional transport strategy, provide a single regional voice for transport investment, and support the acceleration of regional transport priorities. Transport East published the Draft Transport Strategy on 2nd December 2021 and following a period of consultation formally adopted its Transport Strategy on 11th July 2022. The strategy identifies four strategic priorities. • **Creating Sustainable Places and Communities** to ensure that all places support the transport needs of all residents, Essex County Council will work with partners to design sustainable developments from the start, and to reduce transport's impact on the environment. • **Connecting People, Places and Businesses** to maximise the business potential of Essex, ensuring that people have inclusive and affordable access to employment, education & training, and that the transport network has a secure and long-term future. • **Energising coastal and rural communities.** A reinvented sustainable coast for the 21st century which powers the UK through energy generation. Supporting our productive rural communities and attracting visitors all year round. • **Unlocking international gateways.** Better connected ports and airports to help UK businesses thrive, boosting the nation's economy through better access to international markets and facilitating foreign investment. As the relevant Transportation Authority and Highways Authority for Essex, ECC formally endorsed the Transport East Transport Strategy at a Cabinet meeting on 19th July 2022. The Transport East Transport Strategy, its priorities for transport, and delivery goals will be reflected in future transport strategy and policy developed by ECC.	
	3. LTP4 ECC has commenced the development of a new LTP that will replace the current Essex Transport Strategy (the statutory LTP covering Essex). It is intended that the new LTP will be evidence led and focussed upon the delivery of strategic outcomes linked to the delivery of wider Essex and Government priorities. During the summer of 2024 ECC consulted on the strategic framework for LTP4 that included three strategic themes that reflect the need for the LTP to be focussed on the delivery of wider outcomes outlined above and the need for the LTP to address longer term transport strategy and planning. • **Supporting People, Health, Wellbeing, and Independence**, ensuring that people have inclusive and affordable access to key services, improving physical and mental health and wellbeing, and ensuring that the transport network is safe, and feels safe, for all users. • **Creating Sustainable Places and Communities** to ensure that all places support the transport needs of all residents, Essex County Council will work with partners to design sustainable developments from the start, and to reduce transport's impact on the environment. • **Connecting People, Places and Businesses** to maximise the business potential of Essex, ensuring that people have inclusive and affordable access to employment, education & training, and that the transport network has a secure and long-term future.	It is agreed that work on a new LTP is paused due to Local Government reorganisation. It is agreed that the evidence base supporting the emerging draft LTP will be published to allow it to inform the development of Local Plans and support cross boundery discussion. Basildon Council seeks ECCs ongoing support in engaging with Thurrock Council in respect of the 5 Bells Junction.
	4. Transport Vision The Basildon Local Plan should reflect the vision, strategy and policies for transport set out within the following - • ECC transport policy contained within the Essex Transport Strategy (LTP3). • Given policy evolution since the adoption of LTP3, due consideration should be given to more recent documents such as Essex Highways of Safer, Greener, Healthier; Our vision to deliver and enable safer, greener and healthier travel for current and future users of the transport network in Essex, Net Zero: Making Essex Carbon Neutral , the Climate Action Plan, and the Transport East Transport Strategy, to ensure that greater emphasis is placed upon sustainable development, the provision and use of sustainable transport, and the decarbonisation of the transport network. ECC has commenced the process that will see the Essex Transport Strategy (LTP3) replaced by a new Local Transport Plan to be adopted in 2025. LTP4 will reflect and formally incorporate the revised policy framework outlined above with significant emphasis on supporting sustainable growth, increased access to opportunity, enhanced wellbeing, and the long-term sustainability of the Essex transport network.	Agreed to continue to review through DtC .

	It is important that the transport components of the Basildon Local Plan, including site selection and design, are led by a transport vision based upon established transport strategy and policy in place and in preparation in Essex that seeks to ensure that greater emphasis is placed upon sustainable development, and the provision and use of sustainable transport.	
	5. South Essex context: The Basildon Local Plan should demonstrate that it is considering growth in Basildon district within the wider strategic South Essex context and is considering the full range of cross boundary issues. For example, strategic transport links (A127, A13, and the London Liverpool St and Fenchurch St rail lines) pass through Basildon providing a strategic transport link between the London and Southend. Growth is also planned to the east of Basildon and this growth is dependent upon these strategic transport links. The Basildon Local Plan, and the selection of specific sites, needs to be considered in this wider context. Considering growth within a strategic context is necessary to fully examine and understand options that could deliver housing requirements and economic growth within Basildon borough while also supporting transport necessary to support growth over a wider area. It is also recommended that adjacent sites are considering growth within a strategic context is necessary to fully examine and understand options that could deliver housing requirements and economic growth within Basildon district while also supporting transport necessary to support growth over a wider area considered as a whole, rather than as individual sites, to support the effective delivery of the transport vision. Planning transport provision across several sites to ensure the joined-up implementation of coherent bus, cycling and walking infrastructure and services is more likely to provide affordable and convenient transport for new and existing residents, enabling the delivery of transport that is sustainable for the long term. BBC and ECC will need to work together on any cross-boundary development proposals. In addition to those identified by BBC, strategic and cross boundary issues include the potential implications arising Thames Freeport, DHGV allocated in the Brentwood Local Plan, emerging neighbouring local plans, Strategic Transport Corridor of A127, A13, A130 and A127/A130 Fairglen Interchange and local network and barriers to north south connectivity; rail capacity; education provision, flood and water management, minerals and waste. This is in addition to Nationally Significant infrastructure Projects such as Norwich to Tilbury National Grid upgrade; Lower Thames Crossing; Oikos and Bradwell B. To this end, any new large urban extensions (or settlements) , apart from West Basildon (given links with Brentwood and Thurrock), near the borough's boundary would need to be delivered in the longer term given current constraints of the strategic road network (e.g. Fairglen Interchange) and have regard to emerging proposals and aspirations arising in Rochford, Chelmsford, Brentwood (including Dunton Hills Garden Village), Thurrock and Southend on Sea (for cumulative impacts) and any evidence / emerging issues arising in Castle Point, where they are in the early stages of plan preparation. At this stage ECC cannot comment on individual site proposals, as their impacts will be informed by the Transport Evidence. However, it is likely that sites to the West of Basildon will require active and sustainable links to the neighbouring Dunton Hills Garden Village, sites to the North and East of Basildon will need to consider the adjacent strategic road network (including any future improvements), and there may be other congested hotspots requiring careful consideration e.g. Sun Corner, Billericay. These areas are highlighted as they were reviewed as part of the withdrawn Local Plan. There will be additional sites to be reviewed as part of the new plan, informed by the transport evidence.	**Noted**
	6. Transport Evidence As referenced in ECC's 2023 response, the transport evidence for the Local Plan will require engagement with ECC in preparing additional evidence, including, but not limited to: • Transportation modelling (including sustainable transport) to develop a strategy to realise modal shift including analysis of existing active and sustainable travel infrastructure (including bus network and services); • Proposed mitigation measures. It is noted that Basildon BC have commissioned Arup to produce transport evidence on their behalf. ECC anticipate a combination of spatial options, and these will require scenario testing for their individual and cumulative impact and their infrastructure requirements. A key issue will be to ensure that the preferred strategy and any potential sites are in sustainable and accessible locations, at the right scale, funding and phasing to ensure the	BBC agrees the ongoing engagement with ECC under DTC as transport modelling progresses. Met with Arup 29/4/2025. Broad Spatial Options are being tested in respect of • Transport accessibility net change in jobs within 1h one-way • Network delay either during peak hours or cumulative over 24hr period • Net change in homes outside 30mins (oneway) from 'facilities' e.g shops, medical, education etc.

	viable delivery of key services and the provision of commensurate transport infrastructure. This will need to include and explore masterplans and implementation delivery strategies. **A127 and A13 Corridors (including junctions):** • The A127 and A13 provide strategic transport links between the M25 and Southend and need to be considered in a wider context. • Improvements to the A127 Strategic Corridor including A127 Major Road Network (MRN) proposals are also being considered through the A127 Member Engagement Group. • DfT is currently considering trunking options in South Essex. These proposals were expected to be announced alongside the Road Investment Strategy 3 (RIS3) announcement earlier in 2024 but this announcement was delayed ahead of the General Election. RIS3 is now part of the new governments review of transport infrastructure projects and announcements are not now expected until spring 2025. It is our assumption that DfT will propose to include the A13 within the Strategic Route Network (SRN) to serve London Gateway, and is considering inclusion of the A13 to Sadlers Farm and the A130 towards Fairglen to provide a strategic link to Southend. This option would see the A13 becoming the principle east-west road link in South Essex, though the A127 is also likely to need to continue to fulfil a strategic function. • Given the strategic function of the A127, A130 and A13 in South Essex; development proposals that impact upon these routes, and the potential future roles of these roads, need to be considered in a strategic South Essex context. For example, significant housing delivery is also needed to the west and further east, and the A127 and A13 also support this growth. • Local development should not preclude the delivery of transport options that may be needed to support the consideration of strategic growth over a wider area. Considering growth within a strategic context does provide options that could deliver housing requirements, economic growth and supporting transport infrastructure and services over a wider area. Proposals will need to be considered in a strategic manner and incorporate the long-term Local Plan requirements across South Essex and for Castle Point, Basildon and Rochford, as well as Brentwood, Southend and Thurrock, along with the cumulative impact of their growth on the strategic network (and implications on the transport network's economic functionality across South Essex and Essex). • Potential sites along the A127 and A13 corridors will need to be considered in a comprehensive manner at a strategic cross boundary scale (with ECC as Highways & Transport Authority and neighbouring Local Planning Authority's), and hence any potential LP allocations will need to be supported by evidence and potential design and engineering transport proposals will need to be considered within that context. • Aspirations arising from piecemeal development opportunities must not be allowed to prejudice the longer-term strategic requirements for South Essex. BBC and ECC need to continue to work collaboratively to identify the most appropriate and deliverable solutions for future growth and the transport network, including the potential for South Essex Rapid Transit. These strategic requirements may require land to be safeguarded to facilitate necessary transport infrastructure improvements. • The major strategic context will need to be clearly considered: in particular the relationships, linkages, and impacts arising from other major transport schemes such as the A127 MRN Improvements, Lower Thames Crossing and their phasing and delivery programmes. • Any future proposals will be required to consider the cumulative growth being planned for in south Essex and not simply the Basildon Borough. This will require a broad consensus amongst strategic partners as to the appropriate solution. Such a solution would likely require road capacity considerations in recognition of future transport pressures, along with incorporating sustainable modes such as walking, cycling, wheeling and rapid transit on a strategic scale whilst being facilitating local high quality and attractive sustainable connectivity. • The County Council's advice has consistently been to not allow additional access(es) onto strategic routes for safety and congestion reasons. This will be kept under review but direct access from nearby land may not be feasible. • Land to the north of Basildon should be considered in the context of maintaining the current strategic function of the A127. Land allocated to the north of Basildon could reduce options to re-route the A127 to the north of Basildon. A potential alternative A127 alignment to the north of the existing road would not be possible if all the proposed land were to be developed, which in part co-joins Basildon with Wickford and Billericay and effectively removes any "gap" for potential route-realignment. Re-routing the A127 is an option that could support the development of land south of the new route, allowing the current A127 to be downgraded to provide access and to reduce severance, ensuring that the new housing has convenient links to the existing Basildon economy and becomes part of a larger Basildon community. • Alternatively, and more radically, if the A130 / A13 becomes the strategic route, traffic could be encouraged to use this route allowing the A127 to be downgraded to a more local road with measures taken to reduce severance and to support development to the north of the A127.	• GIS plots of accidents involving pedestrians, cycles and motor vehicles only. • Net change in jobs within 1h one-way by income distribution • Change in NO2, particulates and carbon emissions LMVR issued for review.

	Allocation of the proposed sites to the north of Basildon could preclude the bypass option outlined above, leading to the selection of this more radical option without full consideration of the strategic implications of this choice. • The transport evidence will therefore need to consider the strategic implications for growth in the vicinity of the A13, A127 and A130. • Development around strategic routes will need to consider the form and function of the A127, A13 and A130, the approach to new and existing junctions, improving north south connectivity, and the implications of potential sites along these corridors, necessitating strategic transport site requirements and phasing that can be covered in the IDP and Site Viability assessment. This needs to be fully assessed and comply with ECC transport policies, guidance and consider the wider transport impacts arising from planned growth in South Essex. **A127/A130 Fairglen junction area:** • The area of the A127/A130 Fairglen Interchange is of major importance to the Strategic Route Network (SRN) and in particular the Lower Thames Crossing, which is planned to be constructed during the plan period of the New Local Plan. The A127 provides strategic road access between Southend (and its airport) and the M25, while the A130 provides north south connectivity within Essex and beyond (and also links Thames Freeport and Freeport East). • Short term improvements are proposed by ECC for the Fairglen Interchange which will improve capacity for a number of years. These improvements are subject to the release of Department for Transport (DfT) funding via the submission of a Full Business Case (currently programmed for late 2024). It is not possible to modify the proposals at this stage. • There remains a need to safeguard land in the vicinity of the junction (as requested in ECC responses to the neighbouring emerging Local Plans in Rochford District and Castle Point Borough) to enable consideration of strategic transport movements and improvements in the future. This will be informed by the developing Local Transport Plan (LTP) (Essex Transport Strategy, currently out to consultation) and subsequent implementation plan for South Essex. This will also inform a SEC transport workstream alongside the LTPs for Southend and Thurrock. • The County Council's advice has consistently been to not allow additional access(es) onto the A127 and A130, both strategic routes, in the vicinity of the Fairglen Interchange for safety and congestion reasons. This will be kept under review but a direct access from nearby land may not be feasible. • Strategic movements via the Fairglen interchange are expected to increase when the Lower Thames Crossing is opened. **Sadlers Farm junction:** The A13/A130/B1464 Sadlers Farm roundabout is also of strategic and local importance, and any development within the vicinity would need to be supported by robust transport evidence to demonstrate it is in a sustainable, accessible, viable and addressed as a cross-boundary matter by BBC with ECC and Castle Point Borough Council. The Lower Thames Crossing is expected to increase strategic movements through the area. **Other transport infrastructure** As well as a vision that develops active and sustainable transport networks to provide alternatives to private car trips (potentially including the development of a rapid transit network for South Essex), the scale of growth and delivery timeframes could also bring back in the need for previously discussed and ongoing 'pinch points' for improvements with considerable funding asks, including, but not limited to: • Improved north-south connectivity across the A127 and potential junction improvements in East Basildon/South Wickford to unlock growth (previously dropped as not required in the Plan period) • South West Billericay link route, may be re-visited. • Active and sustainable Passenger Transport link between Dunton Hills Garden Village and Basildon. BBC will need deliverable and viable Infrastructure Delivery Strategies in place for any ECC related major infrastructure requirements, with clear funding plans. **Air Quality:** Chapter 13 Air Quality should include reference to the ministerial directive relating to NO2 emissions in the vicinity of the A127, being monitored by the Joint Air Quality Unit (JAQU).	

Policy STAT1 Strategic Transport	ECC welcomes the 'STAT1: Strategic Transport' draft policy, and provide the following observations to be addressed: • Higher density development near to transport hubs and services will facilitate the provision of passenger transport and the use of active transport modes, providing alternatives to private car trips. • Particular consideration will need to be given to north south connections via sustainable transport, given current networks and the severance effects of the strategic road and rail corridors.	BBC to work with ECC and address the observations	Noted
Para 8.1	Suggest change to read "*This chapter sets out how the Local Plan will enable and deliver integrated, active and sustainable transport options"* Reason: To align with DfT approach to "integrated transport", rather than sustainable or active. This approach covers much more than joining modes together and is more about integrated thinking and integrated to enable and deliver to be more committal, rather than just promote.	Change as recommended	Agree to amend
Para 8.3	Expand to reflect the proposed changes to Policy STAT1, set out below, including reference to the provision for Electric Vehicles (EVs) In respect of EVs, ECC welcome the references to the electrification of buses and suggest the section is expanded to include reference to electrification of car and vans and the infrastructure required for residents with driveways to charge. If BBC doesn't have a borough-specific strategy, then ECC strongly encourage BBC to work with ECC to help deliver ECC's project in Basildon, this is line with ECC's own commitments in Everyone's Essex ECC suggest BBC include reference ECC's Electric Vehicle Strategy and suggest a policy on EV charging in new housing developments having regard to the Essex Design Guide. The Essex Electric Vehicle Strategy includes plans to use LEVI funding to leverage £millions in private investment into Basildon delivering hundreds of residential charge points by 2030, accelerating the uptake of EVs and the commercialisation of the charging market. ECC suggest a further policy regarding EV provision in new housing developments, having regard to the Essex Design Guide for developers to deliver EV charging infrastructure through home chargers for anyone with on-plot off-street parking and additional chargers in parking areas for those that don't. This is to enable EV uptake and transport decarbonisation even further. ECC recommend the new local plan includes DM policies as outlined by ECC's response to Question 47 in the IOCP under the heading "Development Management". This is to ensure BBC have a full suite of planning polices.	To change as recommended including a new policy for EV and to explore the approach with ECC as the Transportation and Highway Authority.	Approved document S1 requires A new residential building with associated parking must have access to electric vehicle charge points as provided for in paragraph (2). (2) The number of associated parking spaces which have access to electric vehicle charge points must be— (a) the total number of associated parking spaces, where there are fewer associated parking spaces than there are dwellings contained in the residential building; or (b) the number of associated parking spaces that is equal to the total number of dwellings contained in the residential building, where there are the same number of associated parking spaces as, or more associated parking spaces than, there are dwellings. (3) Cable routes for electric vehicle charge points must be installed in any associated parking spaces which do not, in accordance with paragraph (2), have an electric vehicle charge point where— (a) a new residential building has more than 10 associated parking spaces; and (b) there are more associated parking spaces than there are dwellings contained in the residential building Where one or more dwellings with associated parking result from a building, or a part of a building, undergoing a material change of use at least one associated parking space for the use of each such dwelling must have access to an electric vehicle charge point. Where a residential building undergoing major renovation will have more than 10 associated parking spaces after the major renovation is completed— (a) at least one associated parking space for the use of each dwelling must have access to an electric vehicle charge point; (b) cable routes for electric vehicle charge points must be installed in all additional associated parking spaces. Approved Document S: Infrastructure for the charging of electric vehicles

			To review with ECC.
Policy STAT 1 Strategic Transport	Change title to “Transport” Reason - to better align with the supporting text and reasoned justification. As presented consider this to be an overarching transport policy as opposed to providing strategic transport infrastructure. ECC would expect there to be a separate Transport Infrastructure policy to clearly denote the strategic infrastructure to be delivered, once BBC have completed the necessary supporting transport evidence.	Change title and confirm the approach for an additional policy.	Agree to change of title. The Local Plan will set out the strategic infrastructure required following completion of transport modelling and an updated IDP.
Policy Stat1	ECC recommend the changes to the policy wording and supporting text in paragraph 8.3 to reflect national transport policy and NPPF.	Change as recommended and work with ECC. **Para 1**. *“The Council will seek to deliver improved accessibility to jobs, services, and facilities via an enhanced and better integrated transport network.’* Change ECC would recommend greater emphasis on the need to prioritise active and sustainable transport, and the need to facilitate the provision of Electric Vehicles. Change ECC suggest the policy is extended to regarding EVs and how BBC will work with ECC to see EV charging infrastructure delivered across the borough, targeting residents who cannot charge an EV at home, to enable further decarbonisation of transport through private EV uptake. **Para 1 part B** ECC agree with this but due to priority, re-order to: *“walking, cycling, wheeling and public transport.”* (and reflect throughout the Plan) • Insert New point between b and c to require the provision of Travel Plans. To read: *Ensure that new premises and facilities and residential developments are readily accessible by sustainable modes of travel by working with businesses, developers and community service providers to improve accessibility to key services and facilities through the use of travel plans,* Para 1 point c Add the following to the end: *"including travel between nodes.”* Para 1 point d - Suggest a change in emphasis to first promote sustainable locations and design; then providing for and encouraging the use of sustainable transport and then mitigating remaining impacts would be the logical order for a “vision led” approach.	Agree to amendments to Para 1 part B, C and D. EV charging to be reviewed alongside building regulations. D Working with the Local Transport and Local Highway Authority Essex County Council, and neighbouring Planning Authorities and Highways Authorities to promote growth in sustainable locations and design to deliver, in a timely manner, integrated transport measures ~~which~~ promoting sustainable travel patterns and ~~mitigate the impact of planned development on the highways network, promote more sustainable travel patterns and encourage~~ and support increased use of sustainable modes of travel, such as walking, cycling and wheeling and public transport prioritising these modes over the private motor car.

		Change to read: *Working with the Local Transport and Local Highway Authority Essex County Council, and neighbouring Planning Authorities and Transport and Highways Authorities to promote growth in sustainable locations and design, to deliver, integrated transport measures in a timely manner, ~~integrated transport measures~~, promoting sustainable travel patterns and support increased use of sustainable modes of travel, such as ~~public transport,~~ walking, cycling ~~and~~ wheeling and public transport, which mitigate the impact of planned development on the highways network*	
Para 8.22 General Comment Omission – Digital Connectivity	**Omission. DIGITAL CONNECTIVITY** The reference to broadband within paragraph 8.22, however recommend that the Plan is expanded to include a strategi policy for the provision for Digital Connectivity, as part of Telecommunications in accordance with NPPF (paragraph 20). ECC recommend best practice policy wording based on recently adopted Essex Local Plans placing the importance on the provision of high-quality Digital Connectivity to support the economy and residents and provision within new developments. BBC to have regard to ECC's response to IOCP (Q50a Digital Connectivity) as copied below. ECC can provide digital connectivity information to inform the Plan and IDP. **ECC response to IOCP Q50a – DIGITAL CONNECTIVITY** High quality digital connectivity to provide fast and reliable technology has a vital role in promoting sustainable development (e.g. reducing need to travel and minimising transport delay, congestion etc.); enabling business and commerce; for health and wellbeing; social inclusion and many other day to day purposes. The Covid pandemic proved to be a powerful driver for new, smarter ways of working, relying on high quality and high-speed digital connectivity for increased levels of remote working. The advances in both mobile and fixed digital technology allow for new opportunities to increase innovation in the way we currently plan for our future communities in Essex. ECC published its Digital Strategy and action plan in June 2022 which seeks to ensure that, by 2025, every property in Essex can access a 4G or 5G mobile signal, as well as superfast fixed broadband. The specific Infrastructure Delivery Targets are that by the end of 2025: • Superfast speeds will be available at all premises in Essex • Gigabit-capable services available at more than 85% of premises in Essex • 4G services available at over 99% of the Essex geography • 5G services available at all key employment locations and in identified priority areas *ECC policy and guidance & other evidence*	BBC to include a Strategic Policy regarding the provision of Digital Connectivity to support growth, investment and provision in new development. ECC suggest the following wording based on best practice policy in recently adopted Essex Local and Neighbourhood Plans and with regard to the Essex Design Guide. BBC and ECC to work together, ECC to additional information to inform the IDP. ECC suggested best practice policy for inclusion. ***Digital Connectivity Provision*** *The Council will work with the telecommunications and broadband industry to maximise access to gigabit broadband, wireless hotspots and improved mobile signals for all residents and businesses, assisting them in delivering their investment plans and seeking to help address any infrastructure deficiencies or barriers.* *All new residential, commercial developments and other appropriate developments / uses must be served by a gigabit broadband connection to the premises and 4G / 5G mobile connectivity. Connection should include the installation of appropriate cabling within the homes or business units (or other buildings) as well as a fully enabled connection of the developed areas to at least* two *open access network provider, enabling future occupiers to subscribe to gigabit broadband services without the need for further engineering work.* *Proposals for new developments or expansion of existing properties should be capable of receiving gigabit speed and reliable 5G mobile and broadband connectivity. Proposals will*	Basildon Council considers that this matter is now addressed in full by National Policy.

	The following provides a summary of relevant ECC policy and guidance documents for this issue. ECC has taken a voluntary and very proactive stance to enable much fuller coverage and better mobile and fixed technology across Essex through our ongoing Superfast Essex initiative. This has been updated and rebranded to the newer 'Digital Essex' identity. The UK Government recognises and places a great deal of importance on digital connectivity through its Digital Strategy in 2022. There is also a wealth of information readily available and easily accessible via the Superfast Essex and Digital Essex websites, including future plans with regards digital connectivity; the Digital Strategy for Essex; mobile (4G and 5G) connectivity; broadband deals for households on low incomes; future digital connectivity rollout plans; and aspects regarding digital Inclusion. The web-based interactive rollout maps and address checker identifying current coverage and quality of service provision can be accessed here. Digital Essex has a current digital connectivity investment of £1.9m over the next 4 years as set out in the following plans and programme. EPOA has developed and promotes a planning protocol to guide the pre-application (and planning application) process where planning permission is required for new infrastructure or equipment. This includes adaptations to assist both mobile network operators (MNOs) and LPAs. The EDG contains supplementary planning guidance for Planning for 5G and Planning Guidance for digital connectivity focused on fixed line broadband connections. In December 2022 the Government introduced significant updates and amendments to the Building Regulations 2010 for developers to provide digital connectivity infrastructure (including ducting, cabling etc. to Gigabit capable standard) for new build developments, but which did not cover non-residential new build development. Therefore, LPAs should put in place local planning requirements to ensure that ***all*** new developments are fully enabled and connected with future-proofed digital connectivity. ECC can provide BBC with the following information (shapefiles): • Broadband speeds – highlighting premises with no existing commercial coverage or planned commercial coverage from operators working in Essex. These premises are classed as having "Poor or no Broadband". • Superfast Broadband Capable – highlighting premises with existing commercial coverage or planned commercial coverage that is or expected to enable premises to receive Superfast broadband speeds from operators working in Essex. These premises are classed as having "superfast broadband". • Premises – highlighting existing commercial coverage or planned commercial coverage that is or expected to enable premises to receive Gigabit broadband speeds from operators working in Essex.	*be supported where the appropriate cabling and ducting is provided to the premises and linked to infrastructure networks, enabling the fastest available connections. Where connectivity is not currently available suitable ducting that can accept gigabit-cable broadband and/or 5G connectivity should be provided to the public highway or other suitable location.* *Developers will be expected to work with broadband and mobile service providers to ensure that the provision of future-proofed gigabit speed broadband infrastructure and service provision is available, including connections to buildings. This should be by provision of gigabit broadband and either 4G or 5G mobile connectivity.* *To ensure this the applicant / developer will be required to submit a scheme for approval demonstrating how the development will provide digital connectivity (including appropriate standards, timescales, etc.) having regard to approved digital connectivity strategies applicable to the local planning authority area.* *Service providers will be required to demonstrate that visual and other impacts of new infrastructure / equipment planning proposals are acceptable. This is likely to require the submission of a Landscape Visual Impact Assessment report and other necessary evidence reports, as advised by the local planning authority*	

	2024 UPDATE - ECC provide the following updates and recommend the reference to “broadband” is expanded • **Fixed Line Broadband Connectivity:** Currently the UK government mandates that new homes must be built with gigabit-capable broadband connections. Developers are responsible for installing the necessary infrastructure, with costs capped at £2,000 per dwelling. If a gigabit-capable connection cannot be installed, the next fastest available connection must be provided. Some broadband providers, such as Openreach, may offer free or discounted installation for new builds. Developers constructing 20 or more properties can register with these providers for free full fibre connectivity. It is recommended to seek gigabit connectivity from at least one open access network provider, ensuring future residents can subscribe to gigabit broadband services without additional engineering work. • Given the projected number of new builds in this consultation, it is expected that fixed line broadband infrastructure will be funded and delivered commercially by broadband suppliers. Gigabit connectivity should be sought from at least one open access network provider, enabling future residents to subscribe to gigabit broadband services without further engineering work. • **Mobile 4G/5G Connectivity:** Additional consideration should be given to ensuring new dwellings have access to 4G and 5G mobile services. Independent organisations provide coverage data maps, which should be researched for the proposed build areas. Unlike fixed line broadband, early engagement with Mobile Network Operators (Vodafone, EE, VM/O2, and Three) is recommended. This ensures they are aware of the builds and can determine if additional mobile mast infrastructure is needed to provide better connectivity or, extra capacity. This engagement, supported by local planning authorities, should occur early in the planning process. This proactive approach is easier than securing planning after the builds are completed and avoid degradation of existing mobile connectivity in the area.		
Para 8.21 Additional Policy	<u>New Strategic Policy INFRASTRUCTURE REQUIREMENTS</u> ECC anticipate BBC will expand this chapter to include an additional strategic policy to define the infrastructure requirements to be planned for, with BBC’s priorities for infrastructure provision or improvements with this Strategic Policies and the Site Allocation policies to support the planned level of growth. For example see Strategic policy S9 INFRASTRUCTURE REQUIREMENTS within the Chelmsford Local Plan.	BBC to provide an additional strategic policy setting out the Infrastructure Requirements to be planned for.	This will be updated following the completion of the draft IDP.
Para 8.22	ECC recommend a definition of “infrastructure” for inclusion in the new Local Plan and the Plan’s glossary, which represents best practice as applied in Essex in recently adopted Local Plans.	Change the definition of Infrastructure which would ensure consistency with other adopted Essex local plans.	Agree to amendment 3.4 For the purposes of these policies, the widest reasonable definition of infrastructure and infrastructure providers will be

		Infrastructure - Infrastructure means any structure, building, system, facility and/or provision required by an area for its social and/or economic function and/or well-being including (but not exclusively): footways, cycleways and highways; public transport; drainage and flood protection; waste management and recycling facilities; education (primary, secondary, post-16 and SEND) and early years and childcare; healthcare; sports, leisure and recreation facilities; community and social facilities; cultural facilities; emergency services; green and blue infrastructure; open space; affordable housing; digital and mobile connectivity; facilities for specific sections of the community such as youth or the elderly."	applied. The term infrastructure ~~can include any structure, building, system facility and/or provision required by an area for its social and/or economic function and/or wellbeing including (but not limited to): footways, cycleways, bridleways and highways; public transport; drainage, SuDs and flood protection; waste recycling facilities; education and childcare; healthcare; sports, leisure and recreational facilities; community and social facilities; cultural facilities, including public art; emergency services; green infrastructure; open space; affordable housing; live/work units and lifetime homes; broadband; and facilities for specific sections of the community such as younger people or the elderly.~~ means any structure, building, system, facility and/or provision required by an area for its social and/or economic function and/or well-being including (but not exclusively): footways, cycleways and highways; public transport; drainage and flood protection; waste management and recycling facilities; education (primary, secondary, post-16 and SEND) and early years and childcare; healthcare; sports, leisure and recreation facilities; community and social facilities; cultural facilities; emergency services; green and blue infrastructure; open space; affordable housing; digital and mobile connectivity; facilities for specific sections of the community such as youth or the elderly."
Paragraph 8.24	Suggest paragraph is expanded with new bullets to include to cover Education and skills which also require new infrastructure investment to support sustainable growth.	Change to include - *Education – EYCC, Primary, Secondary, Post 16, SEND and Adult Education* - *Employment and Skills Plans* - *Utilities and Services – water, waste water, flood risk management, electric and gas; digital connectivity and waste management*	Agree to amendment • Education – EYCC, Primary, Secondary, Post 16, SEND and Adult Education Employment and Skills Plans • Utilities and Services – water, wastewater, flood risk management, electricity, and gas digital connectivity and waste management.
Para 8.28 Transport and Highways	Suggest changes to be reviewed with ECC to reflect proposed updates to Transport section paragraphs 8.1 – 8.20 and policy STAT1.	Change to read *New development must be supported by active and sustainable means of transport to serve its needs including walking, cycling, wheeling and public transport modes. New transportation and highway infrastructure should seek to mitigate its impact, help reduce congestion, link new development and provide connections to the strategic road network*	Agree to amendment 8.5 New development must be supported by active and sustainable means of transport to serve its needs including walking, cycling, wheeling and public transport modes. New transport and highway infrastructure should seek to mitigate its impact, help reduce congestion, link new development, and provide connections to the strategic road network.
Para 8.28 Flood Risk Management	Consider changing title to Flood and Water Management	Change text to read *New development must be safe from all types of flooding, and should not increase the risk of flooding elsewhere. Suitable strategic and site level measures will need to provide appropriate*	Agree to amendment 8.6 New development must be safe from all types of flooding and should not increase the risk of flooding elsewhere. Suitable strategic and site level measures will need to provide appropriate

		drainage and flood risk management, including the provision and use of SUDS.	drainage and flood risk management, including the provision and use of SUDS
Para 8.2 Community Facilities	The opening sentence lacks clarity and could be read as "developer delivery is expected", rather than "the provision of land and financial contributions, for infrastructure providers to deliver projects". Welcome the list of Infrastructure and services to however should be expanded to reflect NPPF paragraph 101 and ECC's Developers Guide, to including Libraires and Waste management and add a new bullet to refer to Employment and Skills Plans to align with policy E6 to secure contributions.	Change Para 8.29 to read *New development ~~must provide a range~~ facilitate delivery of all necessary of community infrastructure to ensure that it is served by the essential education, health and community services and facilities where the location is not adequality served by existing facilities. This includes:* • Education -Early years, primary, secondary, SEND and post-16 and Adult Education provision • Health care provision • Sport, Leisure, and recreational facilities • *Community buildings, Libraries and space* • Emergency services infrastructure • *Waste collection, disposal and recycling facilities* • *NEW Employment and Skills plans*	Under review
8.29 Community Community Facilities – re Libraries -	Libraries ECC is the infrastructure and service provider responsible for the provision of Libraries for which developer contributions can be secured in accordance with NPPF Paragraph 101 and section 5.10 of ECC's Developers Guide which sets out the requirements for the provision of libraries and library services to support new development and ECC will work with BBC to ensure that the commensurate provision is incorporated int the new local Plan, including the additional evidence base required as part of the Cumulative infrastructure assessment and preparation of the IDP, including for example ECC's request to be engaged in the Basildon Town Centre Master plan including exploring the potential for co-location with Adult Community Learning within the Town Centre as outlined in response to Policy R1 above and in as outline din response to Policy R1. Please also refer to ECC's IOC Response regarding the library service (Q23a, Q42 regarding Basildon Town Centre regeneration and Q50-50a) for further information.	Expand 8.29 and IDP to include provision for Library Services and engage ECC as Library Service provider in relation to Master planning Basildon Town Centre.	
Para 8.30 Green Infrastructure and Natural Environment	Welcome the list however suggest changes to the bullets for clarification	Change bullets to read • Bullet1 *The Provision of a wide range of open space within developments sites to meet amenity, recreational and function needs whilst ensuring access to open spaces by sustainable means are available to everyone*". • Bullet 2 *The provision of a multi-functional network of green and blue infrastructure and to enhance biodiversity to deliver Biodiversity Net Gain and wider environmental net gains.*	Under review

		• Bullet 3 *The provision of areas for nature recovery to contribute to the objectives within the Essex Local Nature Recovery Strategy.* *New bullet GBI is designed to provide opportunities for active and healthy travel, creating attractive, accessible routes for everyone*	
Infrastructure Delivery Policy INF1	Clarification required. ECC support the intention of policy INF1 however question the effectiveness of the policy and to secure, mitigate, fund and deliver Infrastructure and service requirements for ECC major infrastructure and service provider. ECC recommend the policy is changed to focus on the principles and expectations to support delivery and strengthened to clearly set expectation and consider how major developments will be managed including infrastructure delivery mechanisms, and refer BBC to ECC's response to the IOCP on provision of infrastructure (Q50 and Q55) "Infrastructure Planning Infrastructure Delivery and Impact Mitigation" and *Principles for Future large-scale development, which relevant to* policies D1 and D2, noting the ECC wish to work with BBC and recommend the following policy wording based on best practice policy from recently adopted Essex Local and Neighbourhood Plans. Other examples include *CPBC's policy SD1 Making Effective Use of Land and Creating Sustainable Place*s, which was found sound at examination or *Chelmsford CC's Policy S10 in the recently adopted Chelmsford Local Plan*. An alternative approach may be to combine policy INF1 and INF2.	BBC and ECC to work together to review, strengthen and change the approach to policy INF1 to focus on the principles to manage and support and secure infrastructure delivery and mitigation having regard to the suggested best practice wording. ECC provides an example included in recently adopted Essex Local and Neighbourhood Plans. ***ECC's RECOMMENDED POLICY: INFRASTRUCTURE DELIVERY AND IMPACT MITIGATION*** *Proposals for any development must demonstrate that the required infrastructure to support the development will be delivered in a timely and, where appropriate, phased manner.* *Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal. It must further be demonstrated that such capacity as is required will prove sustainable over time both in physical and financial terms.* *Developers will need to make direct provision or contribute towards the delivery of relevant infrastructure as required by the development either alone or cumulatively with other developments, as set out in the relevant Infrastructure Delivery Plan and other policies in this Plan, where such contributions are compliant with national policy and the legal tests. Where necessary, developers will be required to:* 1. *enter into Section 106 agreements to make provisions to mitigate the impacts of the development where necessary or appropriate. Section 106 will remain the appropriate mechanism for securing land and works along with financial contributions where a sum for the necessary infrastructure is not secured via CIL; and/or* 2. *make a proportionate contribution on a retrospective basis towards such infrastructure as may have been forward-funded from other sources where the provision of that infrastructure is necessary to facilitate and/or*	Being considered by new DM policies

		minimise the impacts of their development (including the cumulative impacts of planned development). *Where a proposal requires additional infrastructure capacity, to be deemed acceptable, mitigation measures must be agreed with the Councils and the appropriate infrastructure provider. Such measures may include (not exclusively):* • *financial contributions towards new or expanded facilities and the maintenance thereof;* • *on-site provision of new facilities (which may include building works);* • *off-site capacity improvement works; and/or* • *the provision of land.* *Developers must work positively with the Councils and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance.* *The Councils will consider introducing a Community Infrastructure Levy (CIL) and will implement such for areas and/or development types where a viable charging schedule would best mitigate the impacts of growth. Section 106 will remain the appropriate mechanism for securing land and works along with financial contributions where a sum for the necessary infrastructure is not secured via CIL.* *Where the applicant is seeking an exception to this policy, it will only be considered by the Council whereby:* • *A fully transparent open book viability assessment has proven that full mitigation cannot be afforded, allowing only for the minimum level of developer profit and landowner receipt necessary for the development to proceed* • *It is proven that the benefit of the development proceeding without full mitigation outweighs the collective harm.* • *Full and thorough investigation has been undertaken to find innovative solutions to issues and all possible steps have been taken to minimise the residual level of unmitigated impacts and obligations are entered into by the developer that provide for appropriate additional mitigation in the event that viability improves prior to completion of the development.*	

		For the purposes of this policy the widest reasonable definition of infrastructure and infrastructure providers will be applied. Exemplar types of infrastructure are provided below and should be included in a glossary appended to the Plan.	
Para 8.34 Securing infrastructure and mitigation	Welcome the reference to ECC's Developers Guide however suggest change the sentence to have regard to this Guide, to inform decision making.	Change as recommended and to read *This includes having regard to ECC's Developers Guide to Infrastructure Contributions which sets out ECC's standards for the receipt of relevant infrastructure funding.*	Agree to amendment
Para 8.35	Suggest BBC change the emphasis and approach, ECC would anticipate the presumption that BBC will submit a plan for examination that is considered viable as set out in NPPF paragraph 59.	Change the emphasis of the paragraph.	Under review
Paras 8.36 and 8.37	ECC recommend that paragraphs 8.36 and 8.37 are deleted, as set out above in response to paragraph 8.35. ECC anticipate BBC submitting a plan that is viable in accordance with NPPF paragraph 59. The content within paragraphs 8.36 and 8.37 undermine BBC's assertion that the plan is viable and fails to recognise and the legal requirements in relation to Planning Obligations and CIL tests provision to securing contributions to mitigate the impact of development. A local plan is not required to repeat the NPPF, and as presented paragraphs undermine the basic premiss that BBC has prepared a viable, sound and deliverable local plan, and as such does not have regard to the NPPF and planning requirements for securing commensurate contributions for the provision of infrastructure and services required to mitigate the impact of the development on existing and new communities.	Delete paragraphs 8.36 and 8.37	Under review
Policy INF2 Securing Infrastructure contributions	Approach to securing and delivering cumulative infrastructure in the Infill/Plotland Areas. As referenced in response to policy SG3 regarding large scale development proposed within the Plotland ECC seek clarification on how BBC are to assess and secure cumulative infrastructure and service provision from piecemeal development below thresholds to secure developer contributions with reference to ECC's Developers Guide. ECC recommend BBC sets to a policy approach for inclusion within policy INF2. ECC suggest BBC explore a mechanisms with ECC to agree and approach and wording with ECC's Developers Guide to enable contributions to be sought from smaller developments such as the plotlands and pooled for use in the most effective way to mitigate the impact on education capacity in the Borough, as referenced in ECC's response to the Bowers Gifford and North Benfleet NDO consultation in 2023.	BBC to clarify cumulative Infrastructure and service improvements will be secured and delivered from piecemeal development in the plotlands.	Basildon Council is exploring potential to deliver a CIL for plotland areas. Agree to ongoing engagement with ECC under DtC.
Policy INF2 Securing Infrastructure contributions	ECC welcome and support the intention of policy INF2 in principle, however, question the effectiveness of the policy as worded to secure and deliver the developer contributions. BBC are referred to ECC's IOCP responses to Q50 and 55 as referenced above.	Change policy INF2 as presented and engage ECC having regard to best practice in recently adopted Essex Local and Neighbourhood Plans.	Under review

	ECC suggest the policy is strengthened and re-ordered as outlined below, having regard to the above recommended wording and to "Policy S10 *Securing Infrastructure And Impact Mitigation"* in the recently adopted Chelmsford Local Plan, and suggest BBC consider future proofing the policy by including provision for CIL. ***Policy INF2 Securing Infrastructure*** *Infrastructure must be provided in a timely and, where appropriate, phased manner to serve the occupants and users of the development. Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal. It must further be demonstrated that such capacity as is required will prove sustainable over time both in physical and financial terms.* *Where a development proposal ~~is shown to~~ requires additional infrastructure capacity, to be deemed acceptable, mitigation measures must be agreed with the Local Planning Authority and the appropriate infrastructure provider. Such measures may include (not exclusively):* • *Financial contributions towards new or expanded facilities and the maintenance thereof* • *On-site provision (which may include building works)* • *Off-site capacity improvement works, and/or* • *The provision of land.* *Where new development necessitates infrastructure and service ~~and a highways, transport, education, or healthcare~~ contribution, these will be sought in line with the latest advice or policy guidance from the relevant authorities~~.~~* *Infrastructure will be secured through the use of planning condition and/or planning obligation and/or financial contributions through the Community Infrastructure Levy or its successor.* *Developers and landowners must work positively with the Council, neighbouring Local Planning Authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with adopted policies and published guidance.* ~~Planning permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the necessary requirements arising from the proposed development. Development proposals must consider all of the infrastructure implications of a scheme; not just those on the site or its immediate vicinity.~~ ~~Conditions or planning obligations, as part of a package or combination of infrastructure delivery measures, may be required to ensure that new development meets this principle. Consideration must be given to the likely timing of infrastructure provision. As such, development may need to be phased.~~	BBC engage ECC on the policy approach to INF1 and 2 to change the approach to policy INF2 to effectively secure and deliver Infrastructure contributions.	

	~~Conditions or planning obligations may be used to secure this phasing arrangement~~ *In negotiating planning obligations, the Council will take into account local and strategic infrastructure needs and financial viability set out in the Local Plan Infrastructure Delivery Plan (IDP) and Local Plan Viability Assessment. The Council will ensure that the cumulative impact of planning policy, standards and infrastructure requirements do not render the sites and development identified in the Local Plan unviable and therefore undeliverable.* ~~Developers may also be required to enter into obligations which provide for appropriate additional mitigation in the event that scheme viability improves prior to completion of the development. In negotiating planning obligations, the Council will account for local and strategic infrastructure needs, as well as being mindful of viability.~~ *In negotiating planning obligations, the Council will require a fully transparent open book viability assessment to demonstrate that all possible steps have been taken to minimise the residual level of unmitigated impacts. Developers may be required to enter into obligations that provide for appropriate additional mitigation in the event that viability improves prior to completion of the development.* Reason: - To strengthen the policy to provide certainty and clarification on the expectations and process for requiring and secure the provision of necessary infrastructure and service requirements in accordance with NPPF. ECC suggest BBC refer to "infrastructure and services" rather than listing specific infrastructure or services, noting that the list does not cover the full range for potential S106 contributions and by specifically including some and not all would exclude other S106 contributions from being sought. ECC suggest BBC also provide clarification and links to the IDP and viability.		
Para 8.38 Securing Infrastructure and Mitigation General comment	Agree, consideration will be needed regarding management and maintenance of GBI and any biodiversity habitat enhancements as part of the Biodiversity Gain Plan. As stated through the Environment Act, 2021 Mandatory BNG will require that habitat is secured for at least 30 years via obligations/ conservation covenant.	BBC to include mechanisms for management and maintenance of GBI.	Under review
Policy INF 3 Social and Community Infrastructure	Clarification is required on the reference to 'Learning' in the supporting text and whether the policy would refer to schools et al?	Change as recommended. Add a statement to clarify that *'the Council will support the expansion and improvement of education and childcare facilities including new schools, nurseries and other provision'.*	Under review
INF3 Social and Community Infrastructure	**Policy INF3: Social and Community Infrastructure** Approach in principle The policy covers a wide range of social and community infrastructure including Education, with the same approach however does not recognise	To remove Education Establishments from policy INF3 and add a new policy INF4, Education Establishments.	Under review

	that the lead authority for education has to meet specific requirements and regulations set out in the Education Act, for both planning provision for new / expanded facilities, and any changes to Education land which are deemed surplus to Education requirements. This should be recognised and separated out from "Community" facilities. To provide clarity and certainty ECC recommend that Education Establishments are addressed separately and suggest two dedicated polices respectively. ECC recommend and refer BBC to apply the approach in the Chelmsford Local Plan policies DM21 and DM22 as representing best practice.	ECC as the Local Authority for Education recommend the BBC follow the best practice policies DM21 and DM22 in the Chelmsford Local Plan: Change – remove references to Education from policy INF3 (suggest replace with policy DM21) and introduce policy DM22 Education Establishments as NEW policy INF4. To engage ECC on this matter	
Policy INF3 Part 1	In addition to the above to remove Education Establishments from policy INF3, a further suggest Policy INF3 part 1 is changed for clarification and to align with NPPF.	Change Part 1 to read *The Council will support the provision of new social and community infrastructure [excluding Education], particularly where it makes an ~~efficient~~ effective use of land, and promotes the dual use and/or co-location of facilities.*	Under review
Chapter 9 Meeting the Challenges of Climate Change and Flooding			
	Climate Change and Net Zero Developments. ECC strongly welcome and support BBC's active participation in the Essex wide collaborative climate planning policy group (CPPG) and the reference to the ECAC Report Net-Zero: Making Essex Carbon Neutral (July 2021). ECC support the approach of an overarching Climate Change policy (CC1) and suggest a new clause regarding minimising energy demand. ECC welcome the inclusion of policy CC4 (Net Zero Carbon Development (in Operation)) which broadly reflects the Essex model policy position. However, there are a number of subtle changes made by BBC which do not align and are therefore not supported by the Essex evidence. BBC would need to provide additional evidence to address their changes if the Essex model policy is altered as outlined in the draft Plan. ECC welcome the Embodied Carbon Policy (CC5) and can provide updates to ensure consistency with the Essex latest position. Flood and Water Management. ECC is the LLFA and welcome the strategic policies CC1 (Responding to Climate Change), CC2 (Addressing Flood Risk) and CC6 (Water Efficiency and SuDS), including the reference to the SuDS Design Guide for Essex. Changes are required to CC2 and CC6 to ensure the provision of SuDS and other surface water management requirements applies for all development not just "major" development. ECC identify the additional evidence required and updates to the potential sites constraints maps to include the latest Critical Drainage Areas, the application of the sequential test and need for a Level 2 SFRA. In relation to water management, ECC welcomes the reference to the Water Strategy for Essex, however, seek changes to water efficiency standards to ensure all new residential development achieves 80 litres per person per day (rather than 100 litres) as Essex is an area of serious water stress. It is also recommended that BBC refresh their 2011 water cycle study, to ensure the evidence is up to date		
Policy CC1 Responding to Climate Change	Support the approach of having an overarching policy on Climate Change. Clarification - Suggest there is a need for additional clauses or expansion of clauses are necessary to ensure all climate matters are captured and covered holistically. Cross referencing to the relevant detailed policies is a useful aid for applicants and is therefore recommended.	Additional clauses and cross referencing suggested.	Plan is being restructured. Principal will be considered.
Policy CC1 Clause c)	Additional clause needs to be included or this clause needs to be strengthened to provide some measure of reduction that aligns with UK statutory climate targets.	Amend Clause c) as suggested or include an additional clause. Suggested change: Reduce greenhouse gas emissions *and be fossil fuel free, achieve 'net zero' carbon (in operation)*	Agree to amend

		emissions and minimise embodied carbon emissions in line with policies CC4 and CC5'.	
Policy CC1	ECC recommend additional clauses for this policy.	Add bullet • *Assist the delivery of net gain for biodiversity that will deliver mitigation and adaptation benefits* Add a Clause to ensure that minimising energy demand and incorporating energy efficiency measures is fully considered at the earliest possible stage in the design process, including when considering layout and orientation, and through using a fabric first approach.	Under review
Omission Policy	Omission - Welcome Policy CC1 clause e) to provide opportunities for renewable energy development, however, this is not addressed in detail in the rest of the Plan other than building integrated renewables as part of Policy CC4). ECC recommend BBC provide a positive strategy for renewable energy development, including supporting community-led energy proposals, with a specific policy to set out and respond to the requirements of NPPF paragraphs 160-164.	Add new Policy to address NPPF paragraphs 160-164 regarding opportunities for renewable energy development.	Under review
Para 9.7-9.11 Reasoned justification	Welcome the reference to ECAC report and can advise that the 2024 Review report now published.	Suggest BBC expand to recognise BBC as a party to the ECAC and refer to BBC's own position on Climate Change.	Agree to amend
Para 9.23 Addressing Flood Risk	Welcome reference to South Essex SMWP (2020), however, for context, recommend that BBC also refer 2012 SESWMP, which continues to apply, as referenced in BBC's SFRA level 1 report. The SE SWMP provide and update on the CDA's informed by the 2018? EA climate change allowance, and change in the CDA boundary's	Change as suggested.	Under review
Policy CC2 Addressing Flood Risk	Correction required - Flood risk concerns all development – not just major.	Change Part 1 a to read *1. In order to ensure that new development within Basildon Borough does not increase the number of people and properties at risk of flooding, the Council will:* *a) Apply a sequential risk-based approach to the allocation of land for new ~~major~~ development, and when considering development proposals, in order to guide development to areas with the lowest risk of flooding. In doing so, the Council will consider the flood vulnerability of the proposed use. The Exception Test will be applied, if required;*	Under review
Washlands Paras 9.36 – 9.38 and Policy CC3	Seek clarification on whether the policy and site boundaries have been reviewed against the revised NPPF and new and PPG - Flood Risk and Coastal Change (2022) and suggest the policies map is updated to reflect changes to the Critical Drainage Area boundaries (as supplied for the SFRA Level 1)	Review as suggested.	Site boundaries are being refined to reflect the most recent SFRA.
Policy CC4: Net Zero Carbon Development	ECC welcome BBC's engagement with and application of the Net Zero Carbon Development in Operation) Policy. However recommend that BBC incorporate and apply the whole of the policy as prepared with its supporting evidence to	Change as recommended or alternatively BBC will need to provide the evidence for the changes which do not align with that prepared for the Essex-wide policy.	Under review

(in operation) - Detail	ensure the policy is robust with the necessary evidence. If BBC seek changes, then further evidence will be require by BBC to support the changes. ECC recommend changes to the key requirements set out in the policy CC4 that need to be adjusted to accurately reflect the Essex model policy position and supporting technical evidence as set out below The ECC recommend the following changes to the Requirements presented as Essential, Desirable and points for consideration Essential Changes to the following requirements: Requirement 1 1i) should be changed to read *"…must achieve a space heating demand of **~~less than~~** 15 kWh/m2 GIA (gross internal floor area)/year **or less**".* This is because buildings that achieve 15 kWh/m2 GIA /year are acceptable. 1ii) should be amended as follows *"…must achieve a space heating demand of **~~less than~~** 20 kWh/m2 GIA (gross internal floor area)/year **or less**".* This is because bungalows that achieve 20 kWh/m2 GIA /year are acceptable. Requirement 4. The energy offsetting clause that is included in the Essex model policy position has been omitted. It is recommended that this clause is included as part of Requirement 4 to provide flexibility within the policy for developments where it may not be technically feasible to meet the Solar PV electricity generation requirement. This approach was supported by Inspectors considering similar policies that have been adopted in Local Plans elsewhere. The offsetting mechanism only applies to 4i). An **asterix *** should be added to the end of this clause and the following text inserted ***For development proposals where it is demonstrated to the satisfaction of the Local Planning Authority that meeting Requirement 4 is not technically feasible then renewable energy generation on-site should be maximised and the residual amount of renewable energy generation (equivalent to the shortfall in meeting the annual energy use of the building in kWh/year) must be offset by a financial contribution (to cover the administration, purchasing and installation of a solar PV renewable energy (electricity) system elsewhere in the plan area or County, which is able to generate a similar amount of energy) and be paid into the Council's offset fund.*** ***The offset price is set at £1.35 per kWh or the most recent updated version and the contribution shall be calculated at the time of planning application determination.*** The evidence base on the website supports the model policy, and so if there are changes to the key requirements of the policy (as **flagged up above**), then BBC will need to consider what evidence it needs to justify the changes. Desirable changes to the Requirements**:** To align more accurately with the Essex model policy position and improve clarity, BCC may wish to consider the following suggested amendments: Requirement 2.		

	- The third clause iii can be deleted. This was from an early version of the Essex model policy position. The published version (Nov 2023) does not have this in because it was considered not necessary and effectively repeated clause ii. Requirement 4. - First Para - Amend the last part of the first paragraph as follows: *"…greater amount of ~~renewable~~ rooftop solar PV energy (electricity) generation:"* - 4 ii). Delete '*as a minimum'* as it is considered superfluous, the clauses a and b already say '*at least'*. Changes for BBC consideration/clarification The Published Essex model policy will be updated with some minor wording tweaks in due course (Q1 2025). These have come about after public consultation on other local plans in Essex and mainly aid improving clarity of the policy. Suggested below are the proposed tweaks and Basildon Borough Council may wish to incorporate these into CC4 to aid clarity: - Insert 'predicted' to first clause before 'annual energy use' for clarification and also aligns with terminology used in Requirement 4 i - Requirement 4 b). Replace 'annum' with '**year'.** There are further variations noted in the wording of Policy CC4 compared to the Model policy position which are considered acceptable as long as the key requirements are the same (see amendments indicated above). Some additional text has been brought into policy wording which was suggested as explanatory text in the Essex Model Policy position document. This is considered acceptable and is supported. However, some elements of additional text that relate more to the how a policy will be implemented may be better located as a separate clause at the end of the current policy wording. For example, the references to the Energy Assessment, predictive energy modelling and MCS calculation methodology may be better positioned after policy requirement 5 as an explanation of 'how' the policy is to be implemented through the planning process. For example: - in the second paragraph - keep first sentence up to & including "as set out below" and move the rest to after requirement 5 as a catch all to explain "how". - Incorporate the '*to be demonstrated using predictive energy modelling'* text from the title of requirement 1 and 3 into the new text below the Requirement 5, and also the '*(output to be calculated following the Microgeneration Certification Scheme (MCS) guidance method)'* from Requirement 4.		
Policy CC4 Requirement 5ii	Requirement 5ii is supported. Suggest BBC will need to provide evidence to support the inclusion of an in-use energy monitoring requirement on non-residential development proposals. The Essex model policy position did not	Basildon to provide evidence to support policy clause relating to in-use energy monitoring of non-residential developments. Note that Uttlesford Local Plan (Reg 19) includes a similar clause.	Under review

	include this as the evidence base underpinning the Essex model policy did not cover this.		
Policy CC4 Part B	The clause is supported but suggest BBC will need to provide evidence to support the inclusion of Listed Buildings. The Essex model policy position excluded Listed Buildings because the evidence base underpinning the Essex model policy did not model Listed Buildings.	Basildon to provide evidence to support policy clause relating to Listed Buildings if required at Examination.	Under review
Paragraph 9.51	As set out above the BBC are strongly recommended to include the Energy Offsetting Clause in Policy CC4 in order to provide flexibility within the policy for those developments for which it is not technically feasible to meet Requirement 4i) – generating sufficient renewable energy to match predicted annual energy demand. This paragraph would need to be amended to reflect the inclusion of the Energy Offsetting clause. Suggest add the following to the end of the last sentence: *"…. followed by offsetting residual energy (if required) as a last resort."*	Change as recommended	Under review
Paras 9.52 – 9.65	Support this text which reflects the Essex model policy position.		
Para 9.66 & Para 9.68	Although it reflects the current Essex Model Policy Position supporting text, the following minor amendments are suggested to improve clarity (these will be incorporated into the updated Essex Policy Position (Q1 2025).	Change paragraphs as recommended Amend paragraph 9.66 as follows: Revise Paragraph 9.66 to read: *The policy sets out two ~~options~~ routes for calculating the renewable energy provision required from a development to be policy compliant. ~~Option~~ Route i. requires renewable energy generation to match the predicted annual energy use of a building. ~~Option~~ Route ii. sets a minimum amount of renewable energy generation to be achieved in a year based on the building footprint (thereby ensuring that opportunities are taken for rooftop solar PV on large buildings e.g. warehouses). Whichever calculation results in the greater amount of solar PV renewable electricity generation is the route that must be achieved.* Revise first sentence of Paragraph 9.68 to read: *Matching or exceeding predicted total annual energy use on site with renewable energy generation achieves an on-site energy balance and hence a net zero carbon development in operation from the outset.*	Agree to amend
Omission – after Para 9.68	As per comments above regarding the omission of the Energy Offsetting Mechanism from the Policy CC4. Recommend Change and add following text to support the inclusion of the Offsetting clause in the policy. ***Renewable Energy Offsetting Mechanism***	Change as recommend - to support the inclusion of the Energy Offsetting Clause.	Under review

	There may be circumstances where it is not technically possible to match on-site renewable energy generation with annual average energy demand. An offsetting mechanism is therefore provided to enable these developments achieve policy compliance. *For the offset mechanism to be triggered, the applicant must justify and demonstrate, to the satisfaction of the Local Planning Authority (LPA), why it is not technically possible for the development to achieve policy compliance with Requirement 4. To do this, applicants should refer to, and meet, the minimum information requirements for policy compliance set out in Report 2: Essex Net Zero Policy – Policy Summary, Evidence and Validation Requirements (July 2023). The information will be critically reviewed by the LPA, particularly as evidence shows that it is technically possible to achieve all the policy requirements and at a reasonable cost in most development typologies. It is generally only high rise blocks of flats that would need to use the offsetting mechanism.* *If the offsetting mechanism is justifiably triggered by non-compliance with Requirement 4, then the development proposal must still meet the other Policy requirements 1, 2, 3 and 5, and maximise on-site renewable energy generation.* *The offset mechanism is expressed as a renewable energy offset and the price is set in £/kWh, which will be reviewed at least every 3 years and updated for Essex. The price (as of July 2023) is set at £1.35 per kWh (published in the Report 1: Essex Net Zero Policy – Technical Evidence Base, July 2023) and has been calculated using a robust methodology based on the cost of providing roof top solar PV in Essex and incorporating an allowance for maintenance and administration. The calculation of the contribution required will be made at the point a planning application is determined using the most up to date offset price (£/kWh) for Essex.* *The offset contribution will be used to fund additional renewable energy capacity elsewhere in the plan area or County. The aim is to make up for the shortfall in renewable energy that cannot be generated on-site. The offset mechanism is purposely limited in role and scope and is only intended for use as a last resort.* *The offsetting mechanism meets the legal tests for Section 106 in that it is: (i) necessary to make the development acceptable in planning terms; (ii) directly related to the development; (iii) fairly and reasonably related in scale and kind to the development.* *Further information on how the offsetting mechanism will operate will be available in the Renewable Energy Offsetting Framework document (under preparation) that will be published on the Essex Design Guide. Current*		

	proposals are for a countywide funding mechanism to be administered by ECC. The Offset tariff will be collected as a single payment (via a direct payment / Section 106 / Unilateral Undertaking). It is initially envisaged that the payments will be used to provide roof top solar PV on public amenity facilities (to be determined). Spending of the offset fund is preferred to be within reasonable distance of the original development, and within the same plan area as the development. However, pooling may be necessary to enable installation of sufficient scale schemes.		
Table 6, Page 85	Step 4 of the Table states 'update offset contribution'. This element is supported as indicated above and therefore should be embedded in the Policy CC4.		
Asterix para after Table 6	Typo.	Delete *'instead we'*	Under review
Para 9.74	The Policy CC4 Requirement 5 includes in-use energy monitoring for non-residential developments. Suggest include reference to that requirement in paragraph 9.74.	Insert text to explain requirement for non-residential in-use energy monitoring.	
Para 9.77	As part of the work progressing collaboratively across Greater Essex to support the implementation of net zero policies, a 'SAP conversion tool' has been developed. The intention is that this tool can be used by smaller developers who have yet to invest in predictive energy modelling software as an alternative to PHPP. The tool effectively can be used to convert SAP outputs (which are done for Building Regulations) into demonstrating compliance with the energy performance targets of the policy. A similar tool has been used in Cornwall and Bath and North East Somerset. The tool – the 'Essex Energy Tool (SAP Conversion)' is in its final form ready to review and is anticipated to be published on the Essex Design Guide for initial use in January 2025.	Change - To take account of this tool (and the flexibility it provides smaller developers) then recommend inserting the following paragraph after Para 9.77: *To support the transition of small / medium developers who may have not yet invested in predictive energy modelling software, the Essex Energy Tool has been developed as an interim measure. This tool can accommodate the outputs of the Building Regulations compliance software (known as SAP – Standard Assessment Procedure) and turn them into an appropriate format to indicate whether compliance with the policy requirements has been achieved. It will be available to download from the Essex Design Guide.*	Consider for inclusion in DM policies.
Para 9.78	To reflect the addition of the suggested paragraph after 9.77 referring to the Essex Energy Tool, then para 9.78 needs amending.	Subject to the insertion of new paragraph after 9.77 indicated above change paragraph 9.78 as suggested. *With regards minor development proposals, applicants may use predictive energy modelling or the Essex Energy Tool as outlined above, or if they wish they can choose to follow a 'minimum standards approach' which sets out the specifications that the development…*	Consider for inclusion in DM policies.
Table 7 (page 88)	Minor corrections required to the Table (which ECC consultants, Introba, have confirmed are needed to the Table set out in Report 2 Essex Net Zero Policy – Policy Summary, Evidence and Validation Requirements (July 2023) on the Essex Design Guide.	In table 7 amend as follows: • Add 'Detached' to the Column Heading with 'Terrace/Semi Detached House' • The last row of Air permeability – the unit should be <1 m3/m2h@50 pascals not <1 ach	Agree to amend
Para 9.86	Work is progressing to provide resources to support the implementation of net zero policies in Greater Essex. The following amendments are suggested to Paragraph 9.86 to reflect this.	Change as recommended.	Under review

		To support the implementation of the Net Zero Carbon Development (in operation) Policy in Greater Essex, the County Council will publish a 'Net Zero (in operation) Implementation and Monitoring Guide' which will include simple proformas and templates for applicants to use when submitting their energy information. The guide will help ensure ~~guidance so~~ that meeting the requirements of the policy ~~can be~~ is demonstrated efficiently, effectively and consistently. The Climate and Planning Unit at ECC is available as a consultee to provide support to Local Authorities with implementing the policy. Arrangements for monitoring compliance of permissions granted will also be published, to give confidence that new homes and other buildings are built to the standards granted consent.	
Para 9.87	Bullet 5 point refers to monitoring the Renewable energy offsetting mechanism, yet at present this element is not included in policy CC4. As indicated above the offsetting clause is recommended for inclusion.	Change to include the offsetting clause.	Under review
Paras 9.89 – 9.91	The inclusion of text highlighting the need to assess and mitigate risks of overheating from rising temperatures is supported.	Noted	
Para 9.93	Suggest that the paragraph could be strengthened by clarifying that FHS will not achieve homes/buildings that align with statutory climate targets.	Strengthen the paragraph see 9.14. See comment on paragraph 9.14 for suggested text.	Under review
Policy CC5 Net Zero Carbon Development Embodied Carbon	The inclusion of Policy CC5 is very much welcomed. The *Essex Embodied Carbon Study (June 2024)* provides robust and sound evidence to support the inclusion of the Policy to address embodied carbon emission from new development in the Basildon Local Plan. ECC via the Climate and Planning Unit is leading work to update the *Planning Policy Position for Net Zero Carbon Development Homes and Buildings in Greater Essex (Nov 2023)* which included a 'placeholder' policy for embodied carbon pending the completion of the Essex Embodied Carbon Study and collaborative policy development with Essex authorities. The consultation responses to the Basildon local plan will provide timely feedback that can be used to help progress and inform this Essex-wide work and ECC officers would welcome working with Basildon officers on this. The intention is to update *Planning Policy Position* published on the Essex Design Guide in Q1 of 2025.	Continue working with the Climate and Planning Unit on developing an Essex-wide common policy position for addressing Embodied Carbon and share feedback from consultation responses.	Agree
Para 9.99	Changes suggested to improve accuracy of the paragraph.	Delete as advised. Delete ~~*'all'*~~ from first sentence. And delete the following sentence from the paragraph: ~~*To be clear these policies apply to all development proposals, not just waste or minerals related development, and should be considered in decision-taking as part of the development management process*~~.	Agree to amend

After Para 9.102	To support Clause 1 further, suggest include more guidance (from the Essex Embodied Carbon Study) in the text to outline what information should be included as part of any justification put forward by an applicant.	Include additional text suggested or await outcome of collaborative Essex-wide policy development in the form of updated *Planning Policy Position for Net Zero Carbon Development Homes and Buildings in Greater Essex* (due Q1 2025). For example, the following text is suggested: *The information that should be included as part of any justification put forward by the applicant should include:* *a) The purpose of the new building and whether this is a change of use.* *b) How much demolition is proposed:* *i. Percentage of envelope and structure to be retained by area?* *ii. Percentage of internals to be retained by area?* *iii. Justification of substantial or total demolition by building layer (skin/shell, structure/frame, building services, and space plan/interior).* *c) Explanation as to why the existing building cannot be retained, providing evidence to this effect. This should go beyond saying a building is 'low quality' or 'not fit for purpose' and include an assessment of:* *i. Structural condition - by means of a structural engineers report* *ii. Contamination (e.g. asbestos)* *iii. Visual/importance of the architecture in streetscape/location* *iv. Whether the development will deliver significant public benefits which could not be delivered through a retrofitting option – Is there bespoke operational requirements which could not be provided through the repurposing, adaptation and/or extension of the existing building(s)?* *v. Service life/maintenance of fabric and systems – by means of an architectural and building services report.*	Pending Essex wide agreement.
After Para 9.106	To support Clause 2 further, BBC may wish to include more guidance (from the Essex Embodied Carbon Study) in the text to outline the minimum information that should be included as a summary of efforts made by an applicant.	Include additional text suggested or await outcome of collaborative Essex-wide policy development in the form of updated *Planning Policy Position for Net Zero Carbon Development Homes and Buildings in Greater Essex* (due Q1 2025). For example, the following text is suggested: *To demonstrate compliance with the clause, applicants are expected to submit a summary of the efforts made to reduce upfront embodied carbon. For example, this should as a minimum include:*	

		1. *A summary of the efforts made to design a lean, low carbon structure and building design. This will take into account efficiency of material use as well as types of material used. Applicants should justify where large volumes of material are proposed to be used due to specific design features (such as basements, podiums, large cantilevers).* 2. *A calculation of the building form factor (exposed external surface area/gross internal floor area).* 3. *An elemental analysis of the upfront embodied carbon (kgCO2e/m2) associated with three external wall options and two superstructure options. Include justification for the selected wall and structure type.* *A summary of steps taken to design for and drive a circular economy*	
Alternative Considered Para 9.110	Suggest BBC strengthen the paragraph to make clear that embodied carbon emissions are not covered by national planning guidance or the Building Regulations and there is no Government policy requiring the assessment or control of embodied carbon emissions from buildings. The Environmental Audit Committee (EAC) reported to Parliament in 2022 on this issue and highlighted that as a result, no progress has been made in reducing these emissions within the built environment.	Include additional text.	Under review
Page 92 CC5 para 9.99	ECC welcome the inclusion of Para 9.99, which reflects the latest draft text developed being prepared by the Essex authorities to inform policy CC5, Net Zero Carbon Development. ECC is currently updating the text following engagement and feedback with Essex Authorities and will circulate the revised justification to BBC (and Essex authorities) in due course.	ECC can advise of the following update to para 9.99 for clarification purposes to read as follows: *9.99 … whilst adapting to its potential effects, Policy 12, ~~which seeks to locate waste management facilities close to the source of the waste and encourage transportation of waste by rail and/or water~~ concerns transport and access, and seeks to minimise the impact of transporting waste, and Policy S4 of the Essex Minerals Local Plan, ….*	Under review
Policy CC6 Water Efficiency and SuUDS Part 1	PART 1 Water Efficiency The Water Strategy for Essex (prepared by ECC and partners) recommends that Local Plan policies should set ambitious policies for water efficiency and resilience for new homes and non-residential development to reduce the impact of water security. Essex is a 'Seriously Water Stressed Area'. It is noted that Core Policy 34 and the supporting text support a water efficiency standard below the Building Regulations optional requirement for water efficiency of 110 litres/person/day and "supports" rather than "requires" *"at least a water efficiency standard of 90 litres per person per day"*. The recently published DEFRA Plan for Water has considered mandating 100 l/p/d in seriously water stressed areas, such as Essex. The Future Homes Hub recently produced the Water Ready: A report to inform Government's roadmap for water efficient new homes, published in April 2024, which sets	Change Policy CC6 Part 1as recommended and update supporting text as recommended, to require all new residential development to achieve a standard of 80 litres per person per day and non-residential development to achieve full credits for category Wat 01 of BREEAM unless considered impractical considering a phased approach.	Under review

	recommended water efficiency targets for 2025-2035 for water stressed areas from 90-80 l/p/d. The policy should set a mandatory water efficiency target of 80 litres per person per day to future proof new development. The target in the policy of 90 litres is not mandatory and schemes that reach this target will be 'supported'. There is no incentive or requirement for anything below Building Regulations. The policy requirements for non-residential development should achieve full credits for category Wat 01 of BREEAM, rather than three.		
Policy CC6: Part 2 Water efficiency and SuDS	Part 2 SuDS Welcome he policy however changes are required and ECC as LLFA wish to work with BBC to clarify the approach and requirements. The approach needs to be changed to correctly refer to ECC's LLFA requirements as set out in the SuDS Design Guide for Essex. Including what is required for all developments, in principle expectation for SUDs features to be designed into the development from the outset, to manage and reduce the impact of surface water run off, as outlined in the SUDs Design Guide for Essex. ECC wish to work with B	Change Policy CC6 Part 2 as recommended and update the supporting Change to Part 2 last sentence to read *"There is the expectation for minor developments to incorporate SuDS features, these could be things such as permeable paving, planters etc* Change to Part 2b read *"All ~~major~~ new developments should ~~will~~ be supported by an FRA(where requirement criteria has been met) and a Drainage strategy. This is to evidence how the development will mitigate flooding on and off site. This should have regard to the Sustainable Drainage Systems Design Guide for Essex* Add a Bullet point should be added to incorporate climate change Insert *considers the effects of climate change and the need to future proof the site, which should be reflected within the surface water design calculations.'* *Other changes* Expand part 2 to require incorporation of SuDS within the landscape strategy early on. Add the following text "SuDS should be included as part of the Landscape Strategy and early engagement with the LLFA is encouraged in order to ensure all opportunities to increase amenity, biodiversity and multifunctional areas have been considered." Expand to seek to secure improved SuDs provision to capture and harvest rain water for re-use and to separate foul water (see ECCs response to IOCP). Add the following	Agree to amend

		The LLFA encourages new developments to incorporate harvest rainwater for re-use and move away from the use of foul and combined sewers to discharge surface water. The LLFA will not support developments that propose to connect surface water to foul sewers as these systems can become overwhelmed, increasing the risk of flooding and pollution occurring. The LLFA supports the redevelopment of Brownfield sites as this can be an opportunity to reduce surface water run off rates and implement SuDS where there previously had not been any BBC and ECC to work together on this regarding the approach and points of clarification etc	
Para 9.119 – 9.12	The reasoned justification should be updated to reflect the above changes and to have regard to the SuDs Design Guide for Essex and refer to the Water Strategy for Essex	To work with ECC as the LLFA and change as recommended.	Agree
	ECC recommend that the 2011 South Essex Water Cycle Study is reviewed and refreshed in light of extensive changes in Government legislation, policies and strategies and classification of Essex as a Seriously Water Stressed Area.	To undertake and update the 2011 South Essex Water Cycle for Basildon.	An updated Water Cycle study has been commissioned.
Chapter 10 Achieving Well Designed Places			
	Whilst ECC welcome the design principles, it would be helpful to make changes to Strategic Policies D1 Design and place shaping principles) and D2 (Design on Major Developments) with reference to ECC's comments concerning principles for future development in response to the IOCP. ECC recommend changes to Policy D1 to separate out place shaping principles from design to inform large scale development for housing to include mixed uses; advocate the use of Health Impact Assessments and Design Review and to embed healthy place shaping and design principles as referenced in NPPF paragraph 138. ECC propose changes and seek clarification to Policy D2 (Major Development) to clearly require Master Plans on strategic allocations, with the details defined within the respective site policy wording seeks an overview and co-ordinated approach to strategic allocations and provide best practice examples. This is to secure well designed places, based on agreed principles across multiple promoters and infrastructure providers to secure the identification funding, and delivery of the necessary supporting overarching infrastructure and services. ECC would expect these requirements to be clearly set out in site allocations. Health and Well-being. ECC as lead Public Health advisor welcome the vision and strategic objectives to to address the identified health and deprivation issues and encourage creation of healthy communities. ECC recommend the inclusion of an overarching strategic policy to promote health and wellbeing to align with the findings of the IIA and include a specific focus on the characteristics of individual sites and their spatial planning to promote health place making with reference to ECC's response to the 2023 IOCP. ECC seek engagement and recommend an overarching Health and Wellbeing policy including requirements for Health Impact Assessments (HIA) and to encourage healthy food environments, as set out in the NPPF, and refer BBC to the Essex Design Guide Healthy Places Guidance and best practice in recently adopted plans in Essex.		
Policy D1 Design and Place Shaping Principles	Recommend BBC expand the section and policy D1, clarify the approach and clearly define the place shaping principles for major developments and new settlements/communities and major urban extensions.	For BBC to review the policy to clearly define the place shaping principles for major developments. For BBC to engage ECC to review and explore ECC's response to IOCP Section 5 (Questions 54 and 55) and	

	ECC recommend that BBC provides a separate policy to set out BBC's place shaping principles for large scale development, including promoting mixed uses as part of healthy place making, as referenced in NPPF paragraph 138 and have regard to Town and Country Planning Associations Garden Communities principles and Livewell Development Accreditation the Essex Design Guide and other key documents as listed in ECC response , including supporting overarching infrastructure and services, and would expect these requirements to be clearly set out in site allocations. ECC recommend the policy is separated out the design principles, and these should have regard to the Essex Design Guide, prepared for and on behalf of EPOA and endorsed by EPOA and BBC, to inform decision taking; and the Principles for Future Development as set out in ECC's response to the IOCP and copied below, which is relevant to large scale developments. <u>Recommend Principles for Future Development</u> ECC consider that the scale and pattern of growth should be informed by the infrastructure required and balanced to ensure there is the necessary scale of development to secure the developer funding for necessary infrastructure. The following principles and approaches should be considered when selecting a preferred spatial approach for the new Plan, particularly where any urban expansions and/or a new settlement/garden community may be proposed and should be informed by the evidence base and further site assessments (see Local Plan and necessary assessments below). BBC and ECC will need to engage and work closely together to help inform site selection, both individually and cumulatively, to ensure they are at the right location and scale to deliver viable and sustainable infrastructure provision and will need to work collaboratively on agreeing the baseline on existing infrastructure delivery, costs and phasing to support the new local plan and any CIL and ECC will work with BBC. Set out below are the headlines from the list. • cross boundary engagement with ECC and neighbouring authorities with development proposals on / near boundaries – such as DHGV, West Horndon • Large scale developments should based upon TCPA Garden City Principes of reducing the need to travel to and from , inclusion of key services (education, employment, local centres), high quality local employment • Apply Active Design Principles to promote health and stronger communities • Integrated transport packet • Take into account the ELNRS and apply BGN including offside opportunities • Zero carbon Growth by supporting the location growth by supporting authorities and developers to plan, locate and design new development	specifically the *"Principles for Future Development" which are based on best practice in recently adopted Essex Local Plans*. Prioritise active travel and minimise vehicular traffic around sensitive land uses such as schools.	

	that reduces the need for people to make carbon intensive transport trips in the future It should actively promote modal shift through active and sustainable travel; including - Vehicle-free active travel routes should front sensitive land uses such as schools and considered around existing schools and new schools should also have entirely traffic free frontages to encourage active travel and avoid traditional issues with honey-potted school run traffic . • Education provision (from EYCC to SEND and post 16) as set out in ECC Garden Communities and Planning School Places Guide 2022, and ECC Local and Neighbourhood Planners Guide to School Organisation • ECC Developers' Guide to Infrastructure Contributions • Apply the Essex Design Guide principles • Provision of mix employment uses and retail provision and seek opportunities for skills and train and provision of range of community uses • Apply MWPA – site compliance tests • Long term stewardship and social responsibility for large scale developments: an organisation, such as a community trust or similar, should be set up and funded to maintain and develop community assets over the long term for major developments and/or new Garden Communities. Any new community will be empowered from the start and secure community benefits in perpetuity and provided with sufficient financial resources to deliver on this role. (see also Q50-50a) • A master planning approach should be applied to strategic new development (• Mechanisms to be put in place, to plan for funding (e.g. developer contributions, CIL and Government investment) and delivery, to manage phasing, implementation and delivery of new development and to explore approaches such as forward funding investment for the provision of strategic infrastructure, if necessary. Suggest BBC also Commit or require homes and places delivered to Dementia standards, see HAPPI - Design - Topics - Resources - Housing LIN		
Para 10.8	Strengthen - The planning system does and should play and important role in creating healthy places as set out in NPPF.	Review and change text to reflect the role of planning.	Under review
Page 100 Policy D2 Point 7	Change, as note is not appropriate for new schools to front on to roads or parking, see ECC Developers' Guide.	Add: *Vehicle-free active travel routes should front sensitive land uses such as schools*.	Agree to amend
Policy D2 Major Development	It is unclear how Policy D1 and D2 will relate to the Site Allocations – in-particular the Strategic sites, and whether BBC are considering any other policies. There is need for clarification and a consistency of the approach and requirements for relevant Strategic Growth Site Policies and the design	To require a Master Plan approach on the Strategic Allocations to co-ordinate and secure the delivery of large complex developments, including delivery and funding mechanisms to secure provision of strategic and individual site infrastructure and services.	

	policies and Policy D2 which concerned the deliver of Major Developments which could be complex sites with multiple developers / land owners and interdependencies. To assist, ECC recommend a Master plan approach to identify to help ensure the integration of new and existing communities, the provision of infrastructure, as well as creating attractive places to live. MPs should cover details of how sites will satisfy the requirements of relevant specific site policies. Consideration should also be given to funding and delivery mechanisms and long term stewardship as outlined above. For example refer to Chelmsford Local Plan as best practice including Strategic Policy S5 – Protecting And Enhancing Community Assets And Policies For Strategic Growth Sites.	BBC and ECC to work together to clarify the requirements.	
Health	Omission Health and Wellbeing Strategic Policy. ECC is the lead advisor authority of Essex, for Public Health (PH), focusing on proactive, preventative measures to promote healthier lives as well as physical and mental wellbeing. ECC seeks to increase the proportion of people able to live healthy lifestyles by embedding a community-first approach, by helping people overcome social isolation, mental ill health, and substance misuse, and by helping people live fit and active lifestyles. Local Public Health Practitioners are located within individual local authorities to lead public health and associated planning activity, and work with Active Essex, although ECC provides support and training where necessary. ECC recommend that BBC expand the local plan to include a strategic policy on Health and Wellbeing to develop an explicit and specific policy options to improve and encourage healthier food environments. To ensure compliance with the NPPF, PPG and to realise the ambition in BBC's vision for, and reference to health and wellbeing stating that "residents will benefit from higher standards of health and wellbeing and to deliver SO8. This is supported by the findings of the Integrated Impact Assessment (IIA) prepared in support of this Draft Plan Reg.18 Consultation ECC support this approach which is consistent with the NPPF, Essex Joint Health and Wellbeing Strategy and Basildon Health and Wellbeing Strategy the Mid and South Essex Integrated Care System Joint Forward Plan and the Joint Strategic Needs Assessment) and their priorities to reduce the prevalence of adult and childhood obesity, and there is a need for explicit policy options to improve and encourage health food environments, to address the identified health and deprivation issues and encourage creation of healthy communities. This is endorsed by the Essex Health and Wellbeing Board has endorsed the Essex Healthy Weight Strategy, for a whole-system and strategic approach to joining up collective efforts in preventing and treating excess weight in Essex	To expand the local plan to include a Health and Wellbeing policy as recommended and copied below To engage ECC as the PH advisor in the preparation of anew Health and Wellbeing policy to be embedded throughout the plan. **Best practice policy** **IMPROVING HEALTH AND WELLBEING** The Council will work to improve the health and wellbeing of residents by: *a.* working in partnership with the NHS and Public Health to ensure residents can access high quality primary and secondary health care services and that new and improved services are put in place, where appropriate, to serve the growing population; *b.* supporting the NHS (including local GP Surgeries) and Public Health to deliver a service which meets the needs of residents; *c.* working with stakeholders on projects that provide better service integration, locating services where access can be improved, particularly for vulnerable groups and communities; *d.* encouraging healthier communities through targeting issues identified in the Joint Strategic Needs Assessment. The Council will work in collaboration with partners, including Public Health, to avoid a concentration of fast food takeaways, where the number of outlets would be likely to harm public health objectives, particularly in deprived communities; local areas of poor health and near schools;	

	ECC wish to work with BBC to develop this overarching policy and recommend the following policy wording as a basis that can be adapted or expanded on, which was drawn from adopted local plan policies across Essex. ECC can provide additional information to inform or be used for supporting text for the actual policy and points to critical elements we advise addressing, including H&WB strategies and use of HIAs.	*e.* requiring a Health Impact Assessment (HIA) on all development sites delivering: *i.* 50 or more dwellings; *ii.* all development in Use Class C2 (Residential Institutions); *iii.* all non-residential developments delivering 1,000 square metres or more gross internal floor space; and. *iv.* *'sui generis' hot food takeaways*. The HIA should be carried out in accordance with the latest Healthy Places Guidance (as promoted locally through the Essex Planning Officers' Association) and responds to the latest local public health data and community insight gathered by the applicant's team. The HIA scope is to be agreed with the Council's development management and public health prior to commencement of the assessment at the earliest opportunity. The HIA is undertaken at an early stage of the development process and there is clear demonstration that the assessment has informed the overall design of the proposal. *f.* seeking mitigation, provided and/or secured by planning obligations or by the Community Infrastructure Levy (CIL) as appropriate, towards new or enhanced health facilities from developers where new housing development would result in a shortfall or worsening of health provision; and g. ensuring increased contact with nature and access to open spaces and offering opportunities for physical activities through green infrastructure and open space strategies.	
Chapter 11 Conserving the Local Environment (green belt and natural environment)			
	Green Belt and grey belt. ECC seek clarification and engagement in relation Green Belt and grey belt as outlined in response to Policies SG1 and SG3, including an update to the 2023 Green Belt study regarding the cumulative assessment and compliance with the revised NPPF and the release of land and purposes of the Green Belt. Of particular importance is how BBC will secure, fund and deliver the cumulative infrastructure and services requirements (including land and S106 contributions) from planned growth in the grey belt including Infill and Plotland areas arising from piecemeal development, but where the cumulative quantum of development generates the need for infrastructure.	To provide clarification and engage with ECC on the approach to and provision within the Grey Belt and the approach to securing and delivering infrastructure	Under review

	Natural Environment, Biodiversity and GBI. Welcome references to work with ECC in the preparation of the LNRS to inform the draft Plan and the approach to Biodiversity Net Gain (BNG). ECC suggest changes to promote BNG and enhancement for environmental net gains, including the release of land from the Green Belt and the importance of ancient woodlands. Clarification and engagement are sought on BBC's approach to potential site allocations and in relation to the emerging LRNS and its opportunity sites, to secure nature recovery opportunities. ECC also suggest policy changes to securing infrastructure to include provision of GI for its wider place making benefits and for BBC to review their approach noting the current Planning Reform working paper on Development and Nature Recovery (Dec 2024). ECC welcome the references to multifunctional benefits of GBI in place making and design principles and suggest changes to promote and embed biodiversity and multi-functional GBI to assist climate change resilience and wider benefits within in town centres. ECC recommend BBC has regard and include within the new Local Plan the Essex GI Strategy and GI standards, supported by Natural England.		Comments noted.
Para 11.18	Welcome the reference to the Essex GI Standards ECC recommend consideration for development to have regard to the Essex Green Infrastructure Standards and other standards including *"Building with Nature, National Green Infrastructure Frameworks Urban Green Factor and Accessible Green Space Standards"* to encourage compliance with this policy. Refer to *Suitable Alternative Natural Greenspace (SANGs)* needs to be included here, to ensure avoidance impacts on internationally designated sites.	Change to include the highlighted text	Comments noted, text will not be amended as not all national guidance and standards have been included in the Local Plan but will still apply where relevant. Reference to SANGS to be included
Paras 11.20 – 11.21 -	The Essex Local Nature Partnership is working towards a joint approach to BNG, including potential joint specific measurable targets (10% or 20% BNG). This is near completion.	To continue to work with ECC and the LNP regarding BNG, and have regard to the ongoing work to update and inform the draft Plan Change para 11.21 to current government wording - https://www.gov.uk/guidance/understanding-biodiversity-net-gain Add a new paragraph to include the wording 'where viable, they aim to seek more than 10%'.	Amend para 11.21 as follows: BNG is an approach to development.~~, land and marine management that leaves biodiversity~~ It makes sure that habitats for wildlife are left in a measurably better state than before the development ~~took place~~. This means a development will result in more or better-quality natural habitat than there was before development. Basildon Council is not currently actively seeking to go above the requirement for 10% BNG, however this will continue to be reviewed.
Paras 11.22-11.24 Local Nature Recovery Strategy (LNRS)	ECC's role as the responsible authority for the Essex Local Nature Recovery Strategy (the draft LNRS went out to public consultation end of August 2024). The Essex LNRS aims to deliver practical, county-wide initiatives for nature recovery and identifies areas of current particular importance for biodiversity and opportunity locations where habitat creation or improvement can provide multiple benefits for nature and the environment. The emerging LNRS will form the baseline for habitat information, which in turn will generate action to promote biodiversity management and improvement (including identifying strategic opportunity areas) and will provide further useful information.	To continue to work with ECC and the LNP, and explore opportunities in relation to the Potential Site allocations as referenced in response to Chapter 4.	Comments noted.

	The LNRS plays a crucial role in Biodiversity Net Gain (BNG) by offering a strategic approach to off-site BNG delivery. The LNRS includes strategic opportunity maps highlighting areas with the highest potential for environmental benefits for new habitat creations across Essex. Sites of strategic significance offer a 15% uplift in biodiversity units compared to other sites, providing a 15% bonus on units purchased in these locations. This will ensure a strong relationship between new development proposals and relevant strategic opportunity locations.		
Policy NE1 Bullet 2	Update to wording to comply with the revised NPPF (paragraph 187). To deliver on Strategic Objective SO3 (section 3.3 above), wording needs to be added to the policy text on seeking more net gain where viable.	Change point 1. – to read *"protect and enhance" (instead of protect OR enhance)*. Add a new point on delivering 10% BNG, including seeking more than 10% where viable to do so.	Amend Policy NE1 point 1 as follows: Development proposals will be supported where they protect ~~or~~ and enhance international, national, and/or locally designated sites of importance for nature conservation, ecological and/or geological value. Add in a new policy requirement as follows: 4. Unless exempt, development proposals must provide a minimum 10% biodiversity net gain above the existing ecological baseline value of the site, or subsequent government standard, to be calculated and reported in accordance with local and national best practice guidance prevailing at the time of the application, and to be secured for a minimum of 30 years after completion.
Policy NE1 Bullet 2	Welcome the reference to the Essex GI Strategy, (2020) however suggest the policy should be changed to refer to the Essex Green Infrastructure Standards (2022). **Essex's GI Standards 2022** (as endorsed by Natural England) which outlines nine principles and standards for the protection, enhancement, creation, and management of GI in Essex. Applying these standards through development management and planning policy will ensure the delivery of multifunctional, accessible high-quality GI.	Change Bullet 2 To read: - the reference from *Essex Green Infrastructure ~~Strategy~~ Standards (2022)*, or any subsequent strategy.	Amended.
Policy NE1: Bullet 5	Change the policy for clarification and to be consistent with the supporting text and NPPF policy to explicit refer to and the expectations in relation to Biodiversity Net Gain, to be consistent with the supporting text and NPPF. For example – for developments to be designed to deliver Biodiversity Net Gain and wider environmental net gains, that forms an important component of nature recovery networks and the wider landscape scale GI network.	Change Policy NE1 part 5 to read 5. *The design of any new development will be expected to be designed to deliver Biodiversity Net Gain and wider environmental net gains, that forms an important component of nature recovery networks and the wider landscape scale GI network. This could incorporate beneficial biodiversity features including but not limited to: swift boxes, bat or bird boxes, swift, bat and bee bricks, passageways to prevent access to roadways, wildlife kerbs, and gaps in bases of garden fences to facilitate the movement of native wildlife or the creation and connection of wildlife corridors through landscaping or other means.*	Comments noted, BNG policy requirement has been added as per comment above.
Para 11.25	Update to reflect the new NPPF and reference to Threatened species	Add reference to Threatened Species	Amended.
Para 11.41 Policy NE2	Para 11.41 Support reference to Ancient Woodlands in paragraph 11.41.	Change as recommended. Policy NE2 - Change to be consistent with 11.41 and explicitly include reference to "Ancient Woodlands".	Comments noted. Local Wildlife Sites and the types of habitats it included is set out in paragraph 11.41 which is considered to be sufficient.

	Suggest change to includes reference to *Frithwood* as an example, noting the research undertaken by BBC to inform the proposed Post Submission Modifications in 2022 for the now withdrawn BLP.		
Paras 11.40 – 11.41	Local Wildlife Sites - Policy NE2 should include mention of Local Geological Sites in the title. Change to include reference to the single data list audit requirement and recommend adoption of the principles laid out within the document titled, Local Sites in positive conservation management in England are followed to deliver local authority. See: SDL160-00 https://www.gov.uk/government/statistics/local-sites-in-positive-conservation-management--2/nature-conservation-local-sites-in-positive-conservation-management-in-england-2008-09-to-2021-22	Change to include reference to Local Geological Sites.	To update to reflect newly designated LoGS
Chapter 12 Conserving and Enhancing the Historic Environment			
	ECC welcome the full suite of assets identified, suggest changes to text and policy for clarification and consistency, and provide comments on historic assets in relation to the potential site allocations.		
Para 12.5	Suggest clarification	Change to read: ...*relevant conservation area character appraisals*...	Agree to amend
Para 12.9	Amend wording to reflect legislation.	Change to read: ....*desirability of preserving or enhancing the character OR appearance of...Change as recommended*	Agree to amend
Para 12.21	Suggest alternative wording:	Change to read- ..*the Listed Building is compatible with its special interest and historic fabric and will not result in material harm to the significance of the building.*	Agree to amend
Paras 12.28 – 12.31	Suggest incorporating the wording of 12.2 and 12.8 into this section regarding the identification of NDHAs (i.e. inclusion on a Local List, HER, or identified through the planning process).	Change as suggested	Agree to amend
Para 12.30	There is a draft Local Heritage List being produced, including a set of bespoke criteria for the identification of NDHAs in the Borough.	Change as suggested	
Policy HE1, Point 1	Add *Scheduled Monuments*.	Change as recommended	Agree to amend
Policy HE3, point 1e	Suggest re-wording for clarity. Rather than "original building" say, "significance of the building", as later non-original additions to a building could be significant.	Change as suggested	Agree to amend
Policy HE3, point 2a	Suggest replacing "Historic Building Survey" with "Heritage Statement" to reflect commonly used terminology. If needed refer to the relevant Historic England guidance is: https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/	Change as suggested	Agree to amend
Policy HE2, point 3	Suggest additional wording to reflect the conditions in the GPDO Part 14 regarding renewable energy, i.e. renewable energy technologies should be, so far as practicable, sited so as to minimise its effect on the external appearance of the building.	Change as suggested	To cross reference with Historic England response to ensure consistency.
Policy HE3	Suggest an additional point to ensure that harm is given due weight in the decision-making process: Do not lead to harm to the significance of the building or its setting, unless outweighed by public benefits.	Change as suggested	Agree to amend

Policy HE3, point 1e	Suggest re-wording for clarity. Rather than “original building” say, “significance of the building”, as later non-original additions to a building could be significant.	Change as suggested	Agree to amend
Policy HE3, point 2a	Suggest replacing “Historic Building Survey” with “Heritage Statement” to reflect commonly used terminology. If needed the reference to the relevant Historic England guidance is: https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/	Change as suggested	Agree to amend
-Policy HE3, points 2b and 2c	Include additional wording to state harm to the significance of the Listed Building to reflect national policy and guidance.	Change as suggested	Agree to amend
-Policy HE5, point 1	Suggest rewording to replace “appearance or character” with significance to reflect national policy and guidance.	Change as suggested	Agree to amend
Chapter 13 Improving Air Quality and Mitigating Pollution			
	ECC as the LLFA seek further changes to pollution policies, to require all new developments to include requirements in relation to SuDS features to be separated from foul sewers to minimise increased flood risk and pollution. ECC also recommend further changes in relation to the location of education facilities which should be away from areas of poor air quality, to create healthy learning environments, including safer school streets.		
Policy AQMP1 and Para 13.31 AQMP3	Add text and refer to the WLP Policy requirements WLP Policies 2 and 3 are applicable in relation to development within 400m of water recycling centres.	Add reference to Waste Local Plan policy requirements.	Agree to amend
Policy AQMP1	ECC recommend EYCC and Schools and EYC should be considered a ‘sensitive receptor’ in respect of noise. No part of a school site should experience noise levels in excess of 55db $LAeq^{30min}$. This policy should require noise as well as air quality assessments in respect of education and childcare settings.	Change to require air quality and noise level assessments.	Agree to amend
Policy AQMP1	Clarification required regarding the approach and provision of Combined Sewers and provision of SuDS should have regard to the SuDS Design Guide for Essex. ECC preference is for the separation of SuDS form Combined Sewers and refer BBC to ECC’s response to the IOCP.	Change text and work with ECC to clarify the position. Recommend add the following text *The LLFA will not support developments that propose to connect surface water to foul sewers as these systems can become overwhelmed, increasing the risk of flooding and pollution occurring. SuDS features to be designed in line with the updated Construction Industry Research and Information Association (CIRIA) SuDS Manual (CIRIA C753). Water quality Management guidance can be found within Chapter 26 of the manual. When choosing potential SuDS features, consideration around ground conditions and contamination is paramount. Currently, the LLFA does not support infiltration basins/features within contaminated ground, however there is the option for lined SuDS features to be*	Under review

		installed, should site conditions allow. Evidence of pollution mitigation supplied must be supplied.	
Section 14 Initial Proposals for Growth and Change / POLICIES MAP / Proposed and Alternative Sites see also IIA Annex1 Matrices of potential sites)			
	ECC note these are "initial proposals" only and BBC are to carry out further appraisals and evidence to refine the proposals including the need for cumulative infrastructure and environmental impact assessments alongside an IDP. ECC will work with BBC on these cumulative assessments and the additional evidence as set out at the outset and in response to policy SG1. It is too early for ECC to provide detailed comments based on the information presented in the Draft Plan and the available evidence to date. The cumulative assessments and consideration of transport and the planned growth in the wider strategic context of South Essex and ECC services is essential. ECC is already engaged with the transport evidence, and ECC will work with BBC in respect of the other local plan and IDP evidence. This is necessary to assess the impact on our infrastructure and service requirements, to inform the preferred strategy and sites, to promote a sustainable and accessible pattern of growth with supporting infrastructure as set out in the NPPF (paragraphs 110, 115 and 155). ECC also provide general comments including points of clarification and updates. As outlined at the outset of his response and in response to policies SG1 and SG3, ECC refer to BBC the strategic and cross boundary matters to be addressed, based on the planned level of growth and identified potential site allocations; and previous matters raised in response to the IOCP response concerning growth options, securing infrastructure and key strategic and cross boundary matters which continue to apply in addition to the new matters as previously raised and new matters. All should be explored by BBC under the duty with ECC, neighbouring authorities and partners. Set out below are some indicative comments including indicative high-level examples only of potential EYCC and school place requirements based on the information provided. This will be refined through the additional close working and the full scenario testing to be carried out by ECC as local authority for Education. This includes ECC's duties and direct liaison with EYCC and education providers.		
WEST BASILDON (H11, H12, E2, IF4, IF5)			
Page 133 14.14 West Basildon	These two sites, amounting to circa 3,000 homes, would likely require two new primary schools (2.1ha sites). A range of secondary school options will need to be considered including school expansions and additional capacity at Dunton Hills Garden Village.	Allocate suitable land for new primary schools and investigate different options to deliver secondary school infrastructure.	Noted. Basildon Council is currently reviewing the draft allocations.
Page 133 para 14.14 Table West Basildon	These two sites, amounting to circa 3,000 homes, would likely require five new 56 place early years and childcare facilities (0.13ha per provision), preferably co-located with Primary schools where possible. Where the provision is a standalone building, it must be ground floor and have access to its own outdoor space.	Allocate suitable land for new early years and childcare provision and contributions.	This will be reviewed to reflect the Infrastructure Delivery Plan.
H11 Land West of West Mayne	ECC note the Norwich to Tilbury overhead line NSIP proposal cross the proposed site allocation H11 on the border with Dunton Hills Garden Village. Clarification is required on how proposed H11 site allocation will take into account the Norwich to Tilbury NSIP, including alignment and land required for construction purposes, to inform the site allocations level of planned growth, viability, funding, phasing and delivery.	BBC to ensure potential site H11 takes into account and is fully informed by the requirements of the Norwich to Tilbury NSIP proposal.	Ongoing discussions with National Grid.
H11 Land West of West Mayne	ECC suggest the northern part of this site could be appropriate for employment uses, potentially benefiting from proximity to Ford Dunton. This would also provide a buffer from the A127 for new dwellings.	The northern part of this site should be explored for allocation for high productivity employment uses.	Under review
E2 Dunton Boot sales	ECC consider this site to be located away from potential workers, potentially creating accessibility issues.	If this site is progressed suggest it is considered for low density employment uses.	Under review
Central Basildon (H13, H14, H24, H22, H25, H26, H27)			

Page 135	Assuming a significant number of flats rather than houses, the proposed allocations should be accommodated by a new primary school at Gardiners Lane. Secondary school expansions may also be required.	Allocate the s106 school option land at Gardiners Lane as F1 use class to ensure its value is fixed in the event the current permission is not implemented.	Under review
Page 136	This will be very dependant on the unit mix. Dependent on amount of places created, it may be that ECC look to seek contributions only to expand current provision due to the location of the developments. In a worst case scenario the total of houses could create a need for one 56 place facility and one 30 place EYCC facility (0.13ha per provision). Preferably co-located with Primary schools where possible. Where the provision is a standalone building, it must be ground floor and have access to its own outdoor space.	Allocate suitable land for new early years and childcare provision and contributions.	This will be reviewed to reflect the Infrastructure Delivery Plan.
H13 / H14	ECC suggest housing growth along the A13 should be aligned to economic growth.	Suggest one or more new local employment sites should be provided (either as part of or separately to allocations H13 / H14) to align housing growth along the A13 with economic growth.	Under review
East Basildon (H8, H9, H10, H23, E1, E4, AS 3 and AS4)			
Para 14.18 East of Basildon	These four sites, amounting to in excess of 3,000 homes, would likely require two new primary schools (2.1ha each). 3,080 homes are insufficient to fill a new secondary school, but the option may be feasible/necessary when looked at in conjunction with town centre and wider growth (size depends on scenario test).	Identify suitable land for new primary schools and, on a precautionary basis, a new secondary / all-through school site.	This will be reviewed to reflect the Infrastructure Delivery Plan.
Page 140 para 14.18 East of Basildon	These four sites, amounting to in excess of 3,000 homes, would likely require Five new 56 place EYCC facilities (0.13ha per provision). Preferably co-located with Primary schools where possible. Where the provision is a standalone building, it must be ground floor and have access to its own outdoor space.	Allocate suitable land for new early years and childcare provision and contributions.	This will be reviewed to reflect the Infrastructure Delivery Plan.
E4 Land West of Canvey Way	The sustainability of this site for employment uses will depend on sustainable transport links for workers in Pitsea and South Benfleet.	This site should only be brought forward for employment uses if adequate sustainable transport links can be provided for workers in Pitsea and South Benfleet.	Under review
H9 Land South of the A13	Note the proximity to Pitsea railway station and town centre could offer potential for higher density / mixed use development, but the A13 could post challenges for placemaking.	Suggest the site is explored to be brought forward as part of a comprehensive masterplan covering Pitsea railway station and Town Centre.	Under review
H23 bowers Gifford (including plotlands)	Seek clarification and engagement as referenced in response to policies SG1 and SG3.	Clarify and engage.	Under review
Billericay (H1, H2, H3, H4, H5, H6, H7, IF1 IF2 IF3, AS1 AS2)			
Page 143 para 14.20 Billericay	These 7 sites, delivering in excess of 4,000 homes would likely require up to three new primary schools (2.1ha each) and significant additional secondary school capacity (probably a new school).	Identify suitable land for new primary schools and, on a precautionary basis, a new secondary / all-through school site.	This will be reviewed to reflect the Infrastructure Delivery Plan.
Page 143 para 14.20 Billericay	These 7 sites, delivering in excess of 4,000 homes would likely require up to Six new EYCC facilities (0.13hc per provision). Preferably co-located with Primary schools where possible. Where the provision is a standalone building, it must be ground floor and have access to its own outdoor space.	Allocate suitable land for new early years and childcare provision and contributions.	This will be reviewed to reflect the Infrastructure Delivery Plan.

H1 South East Billericay	Note that the site includes land with planning permission for a Solar Farm, which is considered a temporary use land and would not meet the definition for “Grey Belt”.		
Pages 144-147, H2 / H3 / H4 / H6	ECC consider housing growth in and around Billericay should be aligned to economic growth.	Suggest one or more new local employment sites should be provided along the A129 / A176 (either as part of or separately to allocations H2 / H3 / H4 / H6) to align housing growth in and around Billericay with economic growth.	Under review
H3,H5 & H6	ECC note the wBLP including provision for a South West Billericay relief road. IF the new transport evidence requires also requires a link road, BBC through the local plan will need to secure land for the route and an implementation delivery strategy. and provide and supported by an Infrastructure Delivery Scheme to bring the infrastructure forward. ECC notes Frithwood is an Ancient Woodland and as set out in BBC’s withdrawn BLP evidence base, note that all options would need to be considered before a route could considered through the woodland. It would be a matter for BBC to secure any necessary third party land through Compulsory Purchase	Engage ECC with Transport evidence, implementation and delivery strategies , including land ownership	Agree
E3 Land adj to Hovefields Avenue	ECC suggest this site could have significant delivery challenges, reducing its likely contribution to the economic needs of the Borough over the Local Plan period.	Given the delivery challenges, suggest this site should not be relied upon to provide adequate employment land to meet the economic needs of the Borough over the Local Plan period.	Under review
IF2 -5	Infill Sites / Plotlands It is unclear why the redline to remove the whole of the plotland area(s) from the green belt, where no land it promoted for development, except for IF1, promoting 5 dwellings. How has this been defined and assessed for the level of potential growth. There is potential for significant growth through multiple small piecemeal developments between existing developed parcels with limited/no infrastructure delivery or developer contributions. BC will need to master plan the wider strategic cumulative infrastructure requirements and agreed deliver mechanisms with ECC to secure and deliver necessary infrastructure. Small sites are complex and offer very limited S106 contributions. For example H29 Crays Hill for 220 homes could generate the need for 26 EYCC provision, however small piecemeal develop would not.	BBC to review the approach to the land identified for release from the Green Belt is clearly defined supported by strategic overview and infrastructure delivery mechanisms/strategies to fund, phase and deliver the necessary cumulative infrastructure requirements, in consultation with ECC as an infrastructure provider.	Under review
WICKFORD (H15 H16 H17 H18, H19 H20 H21 H28 H29 E3)			
Page 150 para 14.22 Wickford	These 8 sites, delivering circa 4,000 homes would likely require up to three new primary schools (2.1ha each) and significant additional secondary school capacity (potentially a new school).	Identify suitable land for new primary schools and, on a precautionary basis, a new secondary / all-through school site.	This will be reviewed to reflect the Infrastructure Delivery Plan.
Page 150 para 14.22 Wickford	These 8 sites, delivering circa 4,000 homes would likely require up to Six new EYCC facilities (0.13hc per provision). Preferably co-located with Primary schools where possible. Where the provision is a standalone building, it must be ground floor and have access to its own outdoor space.	Allocate suitable land for new early years and childcare provision and contributions.	This will be reviewed to reflect the Infrastructure Delivery Plan.

H19 – Barn Hall	The red line boundary incorrectly includes SS0164 this is the location of recently built Wickford PRU schools site and should be removed from H19 area.	Remove site SS0164 from H19 and update records	Agree to amend
Pages 150-152, H15 / H16 / H18	ECC consider housing growth in and around Wickford should be aligned to economic growth.	Suggest one or more new local employment sites should be provided along the A130 / A132 (either as part of or separately to allocations H15 / H16 / H18) to align housing growth in and around Wickford with economic growth.	Under review
H29 Ramsden Bellhouse Neighbourhood Area	ECC question why the whole of the neighbourhood area boundary has been identified for the release from the Green Belt, to deliver 39 homes covering approximately 220ha.		The area boundary shows the Neighbourhood Plan Area. Agree to amend for clarity.
Growth in Villages page 155 (BG is in East Bas) Land South of Crays Hill (H27 - 220) Ramsden Bellhouse (H29 - 39)			
H27 and H29	Please note ECC's initial estimates included H27 (Crays Hills) and H29 (Ramsden Bell-house) within the areas of Central Basildon and Wickford.		
Potential Allocations IF2 -5	Infill Sites / Plotlands With reference to ECC's comments to policy SG3, it is unclear why the redline to remove the whole of the plotland area(s) from the green belt, where no land it promoted for development, except for IF1, promoting 5 dwellings. How has this been defined and assessed for the level of potential growth. Based on the "Redline" area there is potential for significant growth through multiple small piecemeal developments between existing developed parcels with limited/no infrastructure delivery or developer contributions. BBC will need to master plan the wider strategic cumulative infrastructure requirements and agreed deliver mechanisms with ECC to secure and deliver necessary infrastructure. Small sites are complex and offer very limited S106 contributions.	Recommend BBC to review the approach to the land identified for release from the Green Belt is clearly defined supported by strategic overview and infrastructure delivery mechanisms/strategies to fund, phase and deliver the necessary cumulative infrastructure requirements, in consultation with ECC as an infrastructure provider.	Agree. The Council is considering a CIL for plotland areas.
Urban Capacity Sites (any comments on the sites identified?)			
	ECC request details of the level of proposed growth on the sites (including a breakdown of housing numbers/ flats) in order for ECC to include the proposed sites within an Education Scenario testing, in accordance with ECC's Planners Guide to Local Plans and Neighbourhood Plans (Developers Guide to Infrastructure Contributions	Engage ECC to secure the contributions	Agree when preparing IDP.

Section / Policy Paragraph and page number	ECC COMMENTS – please consider the following matters	Recommended policy / actions and changes
	ECC's Response to the Basildon Local Pan Draft Plan Part 2, March 2025	
General	<u>Duty to Co-operate</u> ECC refer BC to our Duty to Co-operate response to the Draft Plan Part 1 which continues to apply. ECC maintain the need for BC to undertake effective ongoing strategic and cross boundary engagement with ECC under the Duty in accordance with Paragraph 24 to 28 of the NPPF. ECC consider growth in Basildon Town Centre to be a strategic and cross boundary matter and seek engagement in respect of the full range of ECC's responsibilities as an infrastructure and service provider. Since the Draft Plan Part 1, BC has engaged ECC officers in the following activities in plan preparation to date. • ECC has provided BC with additional information on the importance and contents of an overarching Health and Wellbeing policy including HIAs. • ECC has provided an overview of the lead Education Authority's approach and requirements for a full Education scenario test. • ECC understands work is ongoing in the preparation of the Transport Evidence and Strategic Growth Options, including infrastructure and environmental constraints. However, we continue to request engagement in relation to the implications on provision of ECC infrastructure and services.	BC to engage ECC, through the Duty, to progress plan preparation to the next iteration, particularly regards to strategic and cross boundary matters including Basildon Town Centre; It is strongly recommended BC accelerate engagement with ECC on the necessary supporting local plan evidence base given the local plan preparation timetable. This is necessary to ensure BC, in consultation with ECC, can plan and provide the necessary infrastructure and services whilst securing necessary funding. BC to engage ECC on the Basildon Town Centre MP as an infrastructure and service provider and clearly define any growth Parameters and that these are assessed through local plan evidence, as previously raised, and to explore potential for an Essex library and ACL community hub (see response to policy R1).

Section / Policy Paragraph and page number	ECC COMMENTS – please consider the following matters	Recommended policy / actions and changes
	ECC will and continue to seek engagement with BC, through the Duty, to progress plan preparation to the next iteration, particularly regards to strategic and cross boundary matters including Basildon Town Centre and to explore potential for an Essex library and ACL community hub. ECC continue to seek to enter into a Statement of Common Ground with BC at the appropriate time to demonstrate how the 'Duty' has been met, with reference to ECC's response to the draft Plan Part 1 which continues to apply, and that ECC maintain the commitment to continue working with BC as it prepares its Regulation 19 Local Plan with the aim of supporting BC through plan preparation stages, the submitted Plan and its subsequent Examination in Public; and to support and defend BC at the Local Plan Examination wherever alignment and agreement enables this to happen.	
Evidence	<u>Additional Local Plan Evidence required to inform the next iteration of the local plan</u> ECC anticipate that BC will need to further review the draft Plan Part 1 and Part 2 in light of changes to the National Planning Policy Guidance (NPPG) published since January 2025. Specifically: • Natural Environment – regarding Biodiversity Net Gain targets and regard to be had to Local Nature Recovery Strategy to be integrated into local plans • Green / Grey Belt Policy, February 2025	BC to confirm the inclusion of the additional town centre future development sites, opportunity areas and other potential proposals including downgrading Southernhay, relocating the bus station and BC's 2025 Parking Strategy inform the emerging local plan evidence base. BC to engage ECC in the preparation of appropriate new evidence to ensure the Local Plan, IDP and draft MP, can meet ECC's requirements as an infrastructure and service provider. BC to address digital

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	It continues to be too early for ECC to provide detailed site comments, and BC and ECC will need to work together through the further cumulative and individual evidence as listed below to inform the next iteration of the plan, with regard to ECC infrastructure and service requirements. ECC anticipate that this evidence will also seek to address potential strategic and cross boundary matters as raised by service areas (and listed below). • Continue to engage ECC in the preparation of the Basildon Town Centre Master Plan, including Essex Libraries and Adult Community Learning, noting Adult Education is now referenced in revised NPPF. • ECC welcome the references in Draft Plan Part 2, to the MP identifying future opportunities sites and the need for appropriate planned provision for development needs over the local plan period. • It is too early for ECC to provide specific comments on individual proposals in the draft MP. ECC seek clarification on the proposals forming part of the additional local plan evidence base as outlined in response to Policy R1 and supporting text. • ECC seek clarification and recommend that potential development and opportunity areas as outlined in the draft MP, forms part of the local plan's additional evidence on cumulative and individual site infrastructure and assessments to inform the local plan's preferred strategy, site allocations requirements and any mitigation that is be viable and deliverable, as referenced throughout ECC's response to the draft Plan Part 1.	

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	The need for this additional evidence in relation to Basildon Town Centre is to ensure it informs the cumulative evidence base for the emerging local plan, as presented in ECC's list of additional evidence required in response to the Draft Plan Part 1 (and Regulation 18 Issues and Options Consultation Paper (IOCP), 2023). The significant increase in the number of new homes to be planned for, compared to the withdrawn local plan (wBLP) and the quantum and location of new potential site allocations introduce new strategic and cross boundary challenges to be addressed as raised. ECC continue to seek to work collaboratively with BC on this evidence across all ECC infrastructure services which extend beyond transport and education (including early years and childcare). This is to ensure conformity and alignment between the local plan and that our statutory roles and responsibilities are raised with BC to be addressed and delivered appropriately through the plan making process, and to ensure conformity between the local plan and MP. The requirement for this additional evidence is stated here and for brevity is not repeated throughout the response.	
Update on ECC policies and standards	<u>ECC policies and standards and other Guidance at March 2025</u> To assist, please find below an updated list of ECC and other policies, plans strategies, standards and guidance, used to inform ECC infrastructure and services requirements, as referred to and relied upon by ECC. ECC recommend these documents are used to inform and	

Section / Policy Paragraph and page number	ECC COMMENTS – please consider the following matters	Recommended policy / actions and changes
	shape the preparation of the new local plan, Integrated Impact Assessment and IDP and other supporting local plan evidence. The list below only concerns updates and changes since ECC's response to Draft Plan Part 1 and should be read alongside that list. • Local and Neighbourhood Planners Guide to School Organisation (Feb 2025) • Essex New Schools Design Principles (2025) • Essex Heathy Weight Strategy (2024) • Essex Design Guide (revisions since 2024) • Essex Design Guide / BNG Viability Assessments of BNG in Essex For further details, refer to the following reports: • SQW Biodiversity Net Gain (BNG) Viability Study – Key Points (Feb 2025) a one page explanation • Essex BNG Evidence for Need (August 2024) • Essex BNG Viability Final Report (August 2024)	
Chapter 1 Ensuring the vitality of town centres		
Overview	ECC note the proposals in Policy R1 (with reference to the draft Basildon Town Centre Masterplan (MP)) and strongly support the ambitions for the Town Centre, with development expected to make a reasonable and proportionate contribution to the cost of providing and maintaining necessary town centre infrastructure and services. Given the importance of the Town Centre at a sub-regional level (particularly for transportation), ECC consider this to be a strategic cross boundary matter. ECC seek clarification and engagement on the nature and scale of growth to be planned within the Town Centre covering new commercial and residential spaces to understand any implications and requirements for the provision of necessary infrastructure and services where ECC is responsible for their delivery e.g. Transport, SuDS, education including Adult Community Learning, libraires and affordable housing such as	

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	Supported Specialist Housing; and related issues where we can provide guidance given best practice work to date e.g. climate change and urban greening and digital connectivity). ECC welcomed the initial engagement on the MP in December 2024. Of note, ECC seek engagement in relation to potential co-location of Essex Libraries and ACL within Basildon Town Centre, as previously raised and refer BC to the revised NPPF Paragraph 101 regarding provision of new and expanded public services including libraries and adult education. Changes and clarification are sought in relation to securing cultural; community and education facilities (including EYCC, Education, Skills) as part of healthy place making principles. This includes the need to create a policy compliant health and wellbeing approach towards takeaways/fast food outlets in accordance with the NPPF, and to create a healthy food environment to accord with policy HC1 (having regard to ECC's response to Draft Plan Part 1, Chapter 10), economic growth, surface water management, urban greening, climate change, digital connectivity and proposed on the mechanisms to "maintain" infrastructure. There will be a need to review and update Policy R1 and MP together to ensure policy alignment and ECC seek engagement in relation to the comments made, including BC's Car Parking Strategy and the additional local plan evidence identified above.	
Paragraphs 1.7, 1.8 and Reasoned Justification Paragraph 1.16	<u>Economic Growth</u> The supporting text and reasoned justification for Policy R1 do not reference the creative industries in terms of acceptable employment uses, as referenced in the draft Basildon Town Centre Masterplan (draft MP).	Add supporting text to reference the creative industries in the supporting text for Policy R1 in terms of acceptable employment uses.
Future Development Principles Paragraph 1.8 and	ECC as the lead public health advisor, notes that at Paragraphs 1.6-1.8 provide the ambition and in 1.88, BC "*is keen to promote and support development opportunities that contribute to the vision*. This outlines the boundaries for future development and regeneration and provides the key principles and framework for investment and development,	ECC recommend that there are opportunities to add a "health lens" to many aspects of Policy R1 and the MP. Please refer to and apply to policy R1, the explicit references recommended to address a determinants of health to improve and

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MP Vision 4.1 and Guiding principles)	maximising opportunities, capitalising on existing assets and setting out a clear vision for Basildon as a thriving, vibrant and visionary town centre. The focus is on the range of acceptable land uses, however, this should be expanded to include guiding principles to improve the health and wellbeing of the town centre for residents and visitors, to both create a healthy space but to address the determinants of health to improve and encourage healthier food environments linking to the Policy HC1 Health and Wellbeing Strategy. ECC refer BC to ECC's response to the draft Plan part 1 vision and strategic objectives	encourage healthier food environments linking to the Policy HC1 Health and Wellbeing Strategy. in the MP's Vision and demonstrated through the guiding principles in the Draft Local Plan. Please also refer to ECC's response to the Draft Plan Part 1, Vision and Strategic Objectives regarding health and wellbeing.
Paragraph 1.9	<u>Economic Growth</u> Recommend that Policy R1 within Parts 3,4 or 5 includes reference to the need for flexible and adaptable spaces, to allow for changes of land use in response to market demand and consumer behaviour. A wider range of employment opportunities, including creative industry, shared office space, startups and job creation etc as referenced in the MP. Consider the emphasis placed on the evening economy in the MP <u>Libraries</u> ECC Library Service welcome reference to Libraries, in bullet point 6 under culture, and therefore the indirect reference under "cultural"	Change Paragraph 1.9 to read *New development should follow the guiding principles of the Masterplan and contribute to the range of acceptable uses, including:* • *mixed-use developments, including mixed-tenure residential;* • *retail (e.g. convenience and comparison goods);* • *employment (e.g. offices, co-working <u>and flexible and adaptable office space</u>);* • *Recreation and leisure (e.g. restaurants, bars, entertainment, gyms, hotels, open space);* • *civic (e.g. one public estate, Council offices);* • *cultural (e.g. churches, galleries, libraries);* • *health and wellbeing (e.g. hospitals, social care facilities);*

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	within policy R1 part 5 "b" and recommend that this is captured within the MP to ensure conformity with this new local plan policy. Green and Blue Infrastructure (GBI) It is recommended for the last bullet point to Paragraph 1.9 to make reference to making the public realm attractive through urban greening. Greening the public realm involves a variety of features beyond just open spaces. For example, street trees, green roofs, rain gardens, green corridors and biodiverse planting, dual purpose benches with planters. These features collectively contribute to a healthier, more sustainable urban environment.	• *education (e.g. early years); and,* • *active and attractive public realm* Add reference to the library within the draft MP.
Policy R1 (General comment)	Policy R1 will need to be updated to align with the consultation response and revision to the MP to ensure policy alignment. ECC seek engagement to address the matters raised on the MP, in addition to the additional local plan evidence identified above.	To engage ECC Service areas in the revision of Policy R1 in light of comments received on the Basildon town Centre MP.
Policy R1 (General comment)	Highways and Transportation welcome the proposals in the MP as a sustainable location for growth, however seek engagement on the proposals and evidence within the MP; including BC's Car Parking Strategy	To review the comments in the MP and engage Highways and Transportation Authority and to share and engage on the BC's parking Strategy
Policy R1 (General comment)	ECC Library Services and Adult Community Learning (ACL) support the enhancement the Basildon Town Centre and ECC seek engagement with BC under the duty to co-operate, to explore opportunities to enhance	To engage ECC to explore opportunities to enhance footfall and the potential for a new community hub comprising Basildon Library and ACL within Basildon Town Centre, through the preparation of the new local plan and draft Basildon Town Centre MP.

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	footfall and the potential for co-location the Basildon Library with ACL, to provide a community hub within Basildon Town Centre. The library service is both a cultural and community facility providing access to culture, life long learning, skills and wellbeing and access to services, to support both residents in the town centre and wider area. Community Engagement is another key focus for ACL and accessible delivery spaces in the town centre would strengthen the support we offer to families with parenting and residents wellbeing. This could provide the potential to increase engagement with the Basildon Advice Store and any future skills and adult education provision. ACL Essex, currently located off Churchill Avenue, is not easily accessible to those relying on public transport and a central location would facilitate engagement with those most hard to reach. Basildon is a 'levelling up' area and the ACL strategy and curriculum supports this agenda with a curriculum and offer designed to meet the needs of residents to learn new skills and improve their employability. ECC consider this a positive opportunity to be explored, as experienced in Harlow. ECC continue to seek engagements through the preparation of the emerging local plan and draft MP, as previously raised in our response to the draft Basildon Town Centre MP 2020, and subsequent local plan consultations in 2023 and 2024 and the January 2025 Westgate Development questionnaire.	

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Policy R1	ECC as public health advisor welcome the advice in Policy HC1 and the use of Health Impact Assessment for 'sui generis' hot food takeaways. ECC recommend that this is applied to Policy R1 and supporting text with reference to ECC's response to the Draft Plan part 1 That there is a need to address issues of health and obesity and impact of takeaway/fast food restaurants on town centres, which limit the diversity of the town centre by limiting the range of takeaways and fast food outlets and create healthy food environments. (see ECC's Health and Wellbeing response to draft Plan Part 1 as a whole and specifically policy R1, Section 10 (Design) and omission text) ECC as the lead advisor authority of Essex for Public Health support a broader mix of uses within town centres including leisure, cultural, health and wellness, community facilities and services to help deliver sustainable economic recovery. There is a need to address issues of health and obesity and impact of takeaway/ fast food outlets on town centres, which limit the diversity of the town centre by limiting the range of takeaways and fast-food outlets and create health food environments. As identified within the Integrated Impact Assessment (IIA) (Appendix B – b.180) for Town Centres and Retail highlights that "*there are many takeaways/fast food restaurants in the centre, which limits the diversity of uses and services to bring the overall feel of the centre somewhat downmarket*".	Review response and engage ECC Lead Public Health Advisor. Within the context of the national policy, NPPF) PPG, ECC Joint Health and Wellbeing Strategy, Essex Joint Strategic Needs Assessment (JSNA) and Basildon Health and Wellbeing Strategy. ECC recommend development of *explicit and specific policy options to improve and encourage healthier food environments linking to the Policy HC1 Health and Wellbeing Strategy.* Change Policy R1 as follows: *3. Land within the town centre boundaries will be retained for the ongoing provision of uses appropriate to a town centre, including but not limited to retail, offices, leisure and community facilities, and residential (where it contributes to the viability, ~~and~~ vitality health and environment of the town centre).* *5. Development will be supported which:* *a. contributes to diversity, vitality, viability, health, environmental, architectural and ecological quality;* *c. creates a high-quality, distinctive, and inclusive and healthy environment that fosters a sense of belonging and local community identity that contributes to the physical and mental wellbeing of residents. It must enhance the character of the public realm, stimulate investment and development, and provides a healthy pleasant place to live, work, and visit.*

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	As highlighted in the IIA, the PPG Paragraph: 004 Reference: ID:53-004-20190722 highlights that planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. Local planning authorities can have a role by supporting opportunities for communities to access a wide range of healthier food production and consumption choices. In doing so, evidence and guidance produced by the local public health teams and Health and Wellbeing Boards may be relevant. Planning policies and proposals may need to have particular regard to the following issues: • Proximity to locations where children and young people congregate such as schools, community centres and playgrounds • Evidence indicating high levels of obesity, deprivation, health inequalities, and general poor health in specific locations • Over-concentration of certain uses within specified area • Odours and noise impact • Traffic impact • Refuse and litter The updated NPPF (2024) chapter 8 Paragraph 97 states that: *Local planning authorities should refuse applications for hot food takeaway and fast-food outlets:* *a) within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre; or*	As stated in the IIA, Basildon Borough has performed poorly for some health indicators against regional and national averages, it is likely it will continue to do so without substantial intervention, particularly the Borough's high level of obesity. The Local Plan has an important role in encouraging active lifestyles through the provision of sufficient safe, inclusive, and quality open spaces/recreational resources and active travel routes and offers the opportunity to curb current negative trends. As stated within the Local Plan vision *"residents will benefit from higher standards of health and wellbeing"* and Strategic Objective 8 supporting to the deliver the Local Plan vision *"help local people to maintain healthier lifestyles by designing out obesogenic environments and creating healthy food environments"* The above recommendation aligns with the requirements of the NPPF (2024) Paragraph 97 a & b) and would support strategic objectives of the Essex Health and Wellbeing Strategy and NHS Mid and South Essex Integrated Care System Joint Forward Plan and local Basildon Health and Wellbeing Strategy which all have priorities for reducing the prevalence of adult and childhood obesity. Please also refer to the Basildon Borough Hot Food Takeaway Assessment (December 2015) and the Linking Planning, Health and Wellbeing Topic Paper (July 2017) for ensuring that positive physical and mental health and wellbeing outcomes are delivered through the

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	b) in locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution, or anti-social behaviour The Essex Health and Wellbeing Board has endorsed the Essex Healthy Weight Strategy, which highlights the need for a whole-system and strategic approach to joining up collective efforts in preventing and treating excess weight in Essex. This issue has a significant impact on population health and is considered a system strategy. With the recent adoption of the Essex Healthy Weight Strategy, ECC recommends that BC should also consider the impact of the proliferation of hot-food takeaways as part of improving access to healthier food, particularly around schools if evidence supports this, to address obesity as identified in local and county health and wellbeing strategies. This would support to deliver against the Local Plan Strategic Objectives for helping people maintain healthier lifestyles.	Basildon Local Plan which provided supporting evidence for developing a policy for managing Hot Food Takeaways in the borough.
Policy R1 Part 2b	Economic Growth Policy R1 and its supporting text focuses on Basildon Town Centre. However, the following references are ambiguous and should be clarified - "*consolidation of existing commercial and community uses into defined centres of an appropriate scale*" and the "*expectation that proposals will contribute to the re-definition and management of Basildon's interrelated town centre hierarchy and network as defined on the policies map"*.	Consider splitting Policy R1 out from a separate policy covering all centres within the Borough to address the ambiguity or revise the policy accordingly.

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Policy R1 Parts 3, 4 and 5	Recommend that Policy R1 includes reference to the need for flexible and adaptable spaces, to allow for changes of land use in response to market demand and consumer behaviour. A wider range of employment opportunities, including creative industry, shared office space, and opportunities for start-ups/ grow on space and job creation, as referenced in the MP. Recommend Policy R1 could better reflect the emphasis placed on improving the evening economy in the MP.	Change policy to include reference in the MP to - the need for <u>flexible and adaptable spaces</u> for wider range of employment opportunities as indicated - the emphasis places on improving the evening economy
Policy R1 Part 4	<u>General Comment</u> Delete "town centre" - repetition, this is covered in the final reference on the form and function of the town centre and infrastructure could be required for the wider area.	Recommend policy rewording as follows. *New development will be expected to make a reasonable and proportionate contribution to the cost of providing and maintaining necessary <u>supporting</u> ~~town centre~~ infrastructure, including walking and cycling access, public transport, the public realm, <u>green infrastructure, cultural and community facilities</u> and key highway links and junctions which serve Basildon Town Centre.*
Policy R1 Part 5 Part 5b	<u>General Comment</u> ECC welcome Policy R1 Part 5, however recommend Paragraph 1 is updated as reference in ECC's response to Draft Plan Part 1. <u>Libraries, part b</u> ECC recommend specific reference is made to the Library within policy R1, Part 5b to explicitly recognise the role and services of Basildon Library.	Change Part 5 first Paragraph to read, "Development *<u>that protects, support, and where necessary regenerates to ensure they continue to cater for the needs of the communities they serve, ensuring their own continued vitality</u>* will be supported which…" Change Point b to read b. *provides a mix of uses which may include retail, residential <u>(including Part M4(2) and Part M4 (3a and b) homes as set out in policy HOU2)</u>, employment, recreational, educational, <u>dedicated EYCC provision,</u>*

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	This will help ensure consistency with the draft MP which is silent on library services. Please also refer to ECC's proposed changes to policy HC3 and the MP. Please also refer to ECC's response to Draft Plan Part 1, to policies INF1, Paragraph 8.24 and 8.29 to specifically refer to Libraries as a community facility to ensure the new development contribute to and enhance the service offer to meet the needs of the community. Supported Specialist Housing, part b ECC has responsibilities under the Care Act 2014, as the Care Authority and seek changes to policy R1 part b, to recognise and incorporate design standards for new homes including "Building for a healthy life" (as referenced in NPPF Paragraph 138) and accessible and adaptable homes Part M4(2) and Part M4 (3 a and b) and refer BC to ECC's draft Plan Part 1 response in respect of policy HOU1 (part4). EYCC, part b Support the provision of EYCC as educational provision providing social and community infrastructure, however, this should explicitly include reference to provision for and access to dedicated EYCC facilities as necessary supporting infrastructure and have regard ECC's requirements as set out ECC Developers' Guide to Infrastructure Contributions (August 2024) . ECC also suggest that policy INF1 – regarding Community Facilities should be further expanded to include "Youth Services".	*leisure, civic, cultural (including Libraries); community and health facilities;*

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Policy R1 Part 5 New point	Climate Change and Net Zero All previous comments to the Draft Plan Part 1 consultation still apply, including those on Policies CC1, CC4, CC5. With regard to Policy R1, Point 5, there are key sub points omitted which relate to climate change mitigation, adaptation and resilience, including minimising energy consumption and taking opportunities to maximise renewable energy generation where appropriate. Points covering these matters should be added into Policy R1. The new NPPF (December 2024) makes it clear that the planning system (both plan making and decision taking) are required to support the transition to net zero by 2050. All development proposals must consider how they are mitigating and adapting to climate change. Paragraph 161 makes this explicit as it now refers to *full account* being taken of *all climate impacts*. Furthermore, Paragraph 163 introduced the requirement that development proposals must take into account the *full range* of potential climate impacts, and added water scarcity, overheating and storm risk to the list of impacts. Also Paragraph 166 indicates that local authorities should expect new development to *take account of landform, layout, building orientation, massing and landscaping* ***to minimise energy consumption***. It is recommended that BC officers refer to the Essex Open Legal Advice, both Part A and also published more recently Part B (which provides analysis of the NPPF changes and other statutory obligations and the	Add sub-points to Policy R1 5 To cover climate change mitigation, adaptation and resilience, and also minimising energy consumption and maximising renewable energy generation.

Section / Policy Paragraph and page number	ECC COMMENTS – please consider the following matters	Recommended policy / actions and changes
	legal justification for ensuring new development addresses climate change).	
Policy R1 Part 5 New point	To futureproof the policy (particularly from a climate perspective) and ensure that the highest standards of design are achieved (as these standards may change and improve over time), it is recommended that an additional point is included which refers to the Essex Design Guide and any future Design Code that is prepared for the Town Centre. Design codes may be site specific, area specific or thematic. This aligns with key recommendations that were made in the Essex Open Legal Advice Part B – link here.	Add the Essex Design Guide and a Design Code to Policy R1 Point 5.
Policy R1 Part 5 New point	Green and Blue Infrastructure – additional Part Welcome Part 5 points a and f to environmental, ecological quality and landscape, however, this should be expanded to incorporate ECC's previous response to the Draft Plan Part 1, regarding green infrastructure and urban greening which should be integrated with urban design principles and promoted throughout the Local Plan and MP. Further information is available in the Nature Towns and Cities accreditation launched in 2025 which aims to improve residents' quality of life, available herehttps://naturetownsandcities.org.uk/ Please refer to ECC's response policy HC2 below regarding provision of BNG, the ECC and ELNP Viability Assessment for BNG in Essex, demonstrating20% BNG can be achievable and viable and meets the	Amend Policy to add a new point i. to read *i.* *Contributes to the provision of urban greening, which should be integral to the design and layout of buildings and the public realm.*

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	NPPF requirements, which emphasises measurable net gains for biodiversity and the Essex Local Nature Recovery Strategy (ELNRS). The NPPF and February 2025 NPPG / Natural Environment updates that improvements must enhance the landscape, support nature recovery within LNRS, and meet local or Natural England standards for Accessible Green Space and Urban Greening Factor provision.	
Paragraph 1.14 and 1.15	<u>Additional Town Centre Evidence</u> At present the scale of potential growth for both housing and employment is not stated in either the Draft Plan Part2 or MP, however, this should be quantified to inform the evidence base of emerging local plan to provide the cumulative impact assessments and to identify the necessary supporting infrastructure as well as impacts of changes and re-development, such as the reduction in the number of car parking spaces. ECC notes and welcomes the statements in Paragraph 1.14 and 1.5 forming the reasoned justification to Policy R1 that the content of the draft Masterplan highlights "*opportunity sites where development has the potential to come forward within the lifespan of the Local plan (and beyond"* and that "*it is important to make appropriate planned provision for development needs over the period of the local plan, …"*. ECC note that the MP identifies 8 potential future development sites and 3 opportunity areas, in addition to other proposals mainly relating to	BC to confirm the potential planned growth in the town centre as identified in the MP, including the scale of housing and employment to inform the emerging local plan evidence base, including but not limited to Transport and Education. ECC would welcome collaborative ongoing engagement on the preparation of this additional evidence as an infrastructure and service provider, and refer BC to the requirement for this and the other additional evidence in response to the draft Plan Part 2.

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	transport including the potential relocation of the bus station closer to the train station to facilitate the transport hub; downgrade Southernhay, new BC Parking Strategy and that the majority of the identified potential future development is located on existing car parking sites. ECC seek engagement on this additional evidence, as set out at the outset of this response.	
Chapter 2 Healthy Communities		
Paragraph 2.1	ECC welcome and support the inclusion of policy HC1 – Health and Wellbeing Strategy following our response to Draft Plan Part 1 consultation. As highlighted in the IIA strategic objective health is a cross-cutting topic and as such many topic areas explored in the IIA framework influence health either directly or indirectly. Paragraph 2.1 notes that to achieve healthy, inclusive, and safe places policies and planning decisions should facilitate creating healthy communities recognising this not only applies to promoting physical and recreational activities but also enabling the creation of healthy living environments.	Paragraph 2.1 should be expanded to include the official definition of health from the World Health Organisation (WHO) "Health is state of complete physical, mental, and social wellbeing, rather than the absence of disease" which recognises that the enabling creation of healthy living covers a wider definition of health and wellbeing linking to the wider determinants of health that are recognised as a key influence on population health outcomes.
Paragraph 2.5	Consider re-wording Paragraph 2.5. The Essex Joint Health and Wellbeing Strategy 2022-2026 shows that access to a good quality environment, with green spaces and places to	Suggest wording as follows for Paragraph 2.5. *Essex County Council is the lead advisor for public health, focusing on proactive, preventative measures to promote healthier lives as well as*

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	walk, contributes towards both the physical and mental well-being of people ensuring that they are in the best health to engage in employment, or training which leads to employment. The quality of the physical environment is therefore key to addressing both health outcomes and issues associated with deprivation.	*physical and mental wellbeing. The Essex Joint Health and Wellbeing Strategy seeks to increase the proportion of people able to live healthy lifestyles and highlights that access to a good quality environment, with green spaces and places to walk contributes to both the physical and mental wellbeing of people. The strategy also highlights the need to address the wider determinants of health which are the contributing factors to health outcomes through socio-economic factors, access to healthcare, lifestyles and the environment which are key to addressing both health outcomes and issues associated with deprivation. The Joint Health and Wellbeing Strategy also focuses on the intersectionality of health inequality and consideration should be focused on how the built environment positively impacts those most likely to have poor health.*
Paragraph 2.14	This Paragraph should consider how all developments of 50+ unit, C2 Use Class, 1,000 sqm undertake a HIA proportionate to the scale of development. The scope of the assessment and the detail provided should reflect the scale of impact, which is likely to be greater for larger scale developments. Public Health England (PHE) guidance for Health Impact Assessment and the Essex Healthy Places Guidance highlights the types of HIA, such as desktop, rapid and full/comprehensive. In the HIA process, screening is not always required, especially where local policy identifies that HIAs are deemed to be part of the planning process for specified development scales. The scoping stage allows decisions to made about what the aims of the HIA are and the type of HIA (Desktop/Rapid/Full) to be undertaken.	Consider re-wording to the following: *"For development of 50 or more units and non-residential development in excess of 1,000 sqm (excluding agricultural buildings) which have relatively little impact upon health and wellbeing and health services, a rapid or desktop assessment may be sufficient to satisfy the requirements of this policy. For larger scale developments and developments where a rapid or desktop assessment indicates more significant impact upon health and wellbeing and health services, a comprehensive Health Impact Assessment (HIA) will be required. A comprehensive HIA can include matters such as housing quality and design, access to healthcare services and other social infrastructure, access to open spaces and the natural environment, air quality and*

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	For example, in the PHE guidance, a desktop assessment would be recommended for planning applications outside local triggers but with health impact (e.g., 49 units or less).	*noise impact, accessibility and travel options, crime reduction and community safety, access to healthy food, social cohesion and minimising the use of resources. Early engagement with the Council's and Essex County Council's public health officers is recommended prior to commencement of an HIA to help ensure that the HIA can inform proposals effectively. The Council will liaise with the Mid and South Essex Integrated Care System and Essex County Council Public Health when assessing the scope and scale of likely impacts. A HIA should be prepared following the current best practice advice and reflect the most up to date evidence. Further details on preparing HIAs can be found in the Health Impact Assessment section of the Essex Design Guide."*
Policy HC1	ECC welcome and support Policy HC1. Referring to our comments from the Draft Plan Part 1 consultation, the policy wording needs to also include the following three Paragraph underlined below in *"part e after iv"* before *"part f"*. This is a best practice policy that has been applied in recently adopted local plans in Essex. **IMPROVING HEALTH AND WELLBEING** The Council will work to improve the health and wellbeing of residents by: *b*. working in partnership with the NHS and Public Health to ensure residents can access high quality primary and secondary health care services and that new and improved services are put in place, where appropriate, to serve the growing population;	Change Policy HC 1 part b to read as set out below to be effective and consistent with Paragraph 2.9 *iii. 'sui generis' hot food takeaways.* *The HIA should be carried out in accordance with the latest Healthy Places Guidance (as promoted locally through the Essex Planning Officers' Association) and responds to the latest local public health data and community insight gathered by the applicant's team.* *The HIA scope is to be agreed with the Council's development management and public health prior to commencement of the assessment at the earliest opportunity.*

Section / Policy Paragraph and page number	ECC COMMENTS – please consider the following matters	Recommended policy / actions and changes
	c. supporting the NHS (including local GP Surgeries) and Public Health to deliver a service which meets the needs of residents; *d.* working with stakeholders on projects that provide better service integration, locating services where access can be improved, particularly for vulnerable groups and communities; *e.* encouraging healthier communities through targeting issues identified in the Joint Strategic Needs Assessment. The Council will work in collaboration with partners, including Public Health, to avoid a concentration of fast food takeaways, where the number of outlets would be likely to harm public health objectives, particularly in deprived communities; local areas of poor health and near schools; *f.* requiring a Health Impact Assessment (HIA) on all development sites delivering: *ii.* 50 or more dwellings; *iii.* all development in Use Class C2 (Residential Institutions); *v.* all non-residential developments delivering 1,000 square metres or more gross internal floor space; and. *vi. 'sui generis' hot food takeaways*. The HIA should be carried out in accordance with the latest Healthy Places Guidance (as promoted locally through the Essex Planning Officers' Association) and responds to the latest local public health data and community insight gathered by the applicant's team.	*The HIA is undertaken at an early stage of the development process and there is clear demonstration that the assessment has informed the overall design of the proposal.*

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	The HIA scope is to be agreed with the Council's development management and public health prior to commencement of the assessment at the earliest opportunity. The HIA is undertaken at an early stage of the development process and there is clear demonstration that the assessment has informed the overall design of the proposal. *h.* seeking mitigation, provided and/or secured by planning obligations or by the Community Infrastructure Levy (CIL) as appropriate, towards new or enhanced health facilities from developers where new housing development would result in a shortfall or worsening of health provision; and ensuring increased contact with nature and access to open spaces and offering opportunities for physical activities through green infrastructure and open space strategies.	
Policy HC1 Part g & Paragraph 2.14	Welcome the inclusion of Policy HC1 and bullet point g, recognising the importance of connecting people to nature and access to open spaces through the provision of green infrastructure and open space strategies. Sport England and Active Essex are committed to creating active environments that encourage physical activity and promote healthier lifestyles. Their initiatives focus on designing and adapting built and natural spaces to provide accessible opportunities for sport and informal activities. The Active Environments Framework by Sport England offers strategic guidance on planning, urban design, and leisure services to support the development of spaces that foster active	Justification: Change to consider the importance of Active Environments as part of the design of the public realm, open spaces, and sport facilities. Suggest change part d to read: *g. ensure increased contact with nature and access to open spaces and offering opportunities for physical activities through green infrastructure and open space strategies to create active environments as part of the design of the public realm, open spaces, and sport facilities*

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	communities. Both organisations emphasise the importance of effective design and connectivity in creating environments conducive to physical activity. Active Environments Framework | Sport England Active Environments | Active Essex	
Paragraph 2.23	NPPF emphasises the importance of improving green spaces to contribute positively to the landscape setting of developments, support nature recovery, and meet local standards for green space provision, while preventing urban sprawl. Further information is available in a study exploring the future of England's Green Belts called "A Greener Green Belt? Co-developing Exploratory Scenarios for Contentious Peri-Urban Landscapes" by Matthew Kirby, Alister Scott, and Claire L. Walsh. It identifies three scenarios for the next 20 years: "Intensify & Diversify," "Build-Build-Build," and "Multifunctional" and reveals a consensus for more multifunctional Green Belts, which could serve as strategic urban support landscapes to address climate change. The report can be viewed here https://researchportal.northumbria.ac.uk/en/publications/a-greener-green-belt-co-developing-exploratory-scenarios-for-cont	ECC recommend Paragraph 2.23 is expanded to recognise the NPPF's wider emphasis of improving green spaces and its multiple benefits.
Policy HC2 Part 2	ECC recommend that the provision of public open space should align with the active and sustainable travel policies. The Local Plan to supports and encourages opportunities to enhance and establish green infrastructure along sustainable transport and PRoW networks to both encourage active travel and create a green corridor for wildlife.	Ensure the provision of public open spaces align with the active and sustainable travel policies.

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	Every effort needs to be made to ensure that connections between green spaces, local amenities and developments are achieved to ensure that routes make sustainable connections and are attractive through the delivery of GI for the benefit of the new community and existing communities.	
Policy HC2 Part 3 (Existing open space) Part4 (development on opens space not on the policies map)	ECC suggest BC consider applying the mitigation hierarchy to avoid harm to existing GI and provide the following information. The link with BNG is important as, where possible, on site BNG should take precedence off site. It is advised that a hierarchy approach and clear justification have been used to show that no alternative site is suitable, and that the development provides access to multifunctional and high-quality greenspace and GI features (ideally to better quality) and/or compensates for or invests in a neighbouring green space for the benefit of the future and existing communities. For example: • Assess the current quantity and condition of natural assets with the development footprint and what ecosystem services they are providing to society. (Ideally the LNRS habitat mapping should provide this information or undertake a GI audit). • Do everything possible first to avoid harmful impacts. • Minimise predicted impacts on biodiversity and ecosystem services. • Determine whether creation of additional assets or restoration or improvement of natural assets could enhance the benefits flowing to society in the context of development.	Explore a mitigation hierarchy to support identification of site policy requirements

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	• As a last resort, compensate for losses that cannot be avoided, preferably within the development footprint. If this does not generate the most benefits, then these can be provided elsewhere. CIRIA (2019), Biodiversity net gain. Good practice principles for development	
Policy HC2 Part 5 And Paragraph 2.37	Part 5 is welcomed, however, it is recommended the improvements to biodiversity and links to green infrastructure are strengthened to meet the requirements set out in Paragraph 2.37, having regard to Draft Plan Part 1 policy NE1. ECC recommend the policy seeks to achieve a net gain for biodiversity by retaining and providing new public open spaces and green spaces including high quality green infrastructure built into the designs and masterplans of new development, to co comply with the requirements of the Environment Act 2021 and the NPPF, and 2025 NPPG/ Natural Environment update. ECC recommend this policy and draft Policy NE1 are reviewed to include percentage net gain the plan would want developments to achieve and refer BC to the following guidance and evidence recently published in the Essex Design Guide as it relates to BNG and viability. • SQW Biodiversity Net Gain (BNG) Viability Study – Key Points, February 2025 • Viability Assessment of Biodiversity Net Gain in Essex, August 2024 • Essex Biodiversity Net Gain Evidence for Need, August 2024	ECC recommend including the following additional point within the Draf Plan, and review the appropriate location either within Policy NE1 –or in Policy HC2 – as part of Part 5 or as a new part to read, Insert New part: *Development will need to deliver 20% Biodiversity Net Gains and other ecological enhancements, which may include for example:* • *Green roofs and walls,* • *Green corridors and biodiversity links;* • *Wildlife-friendly features, such as nesting or roosting boxes, hedgehog highway gaps and insect hotels;* • *A planting mix and variation in vegetation types.* *Small developments to demonstrate where it cannot achieve 20% to achieve minimum 10% net gains.* Recommend this policiesHC2 and NE1 and R1 are reviewed together to clearly set out the BNG requirements.

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	The evidence assessment concluded that achieving 20% BNG for a range of residential and commercial development typologies and Nationally Significant Infrastructure Projects (NSIPs) is a relatively small percentage of overall cost. The viability assessments demonstrate that a 20% BNG is achievable and viable and meets the NPPF requirements, which emphasises measurable net gains for biodiversity. The Environment Act sets 10% as the minimum standard nationally and does not set a maximum.	
Policy HC2 Bullet point 5c	ECC recommend Policy HC2 Point 5c and supporting text is updated and is set in the wider context with regard to draft Policy NE1 and the February 2025 update to the National Planning Practice Guidance / Natural Environment section published in February 2025, introducing the duty of the LPA to have regard to the Local Nature Recovery Strategy (LNRS) and to integrate LNRS into local plans. This is a legal requirement from the Environment Act 2021 and aligns with the NPPF. In doing so, ECC recommend changes to maximise the multifunctional benefits of green infrastructure in the design and enhancement of open spaces. which can be achieved through connecting Local Nature Recovery Networks, BNG and GI to maximise multifunctional benefits, and to have regard to and integrate the Essex LNRS into the new local plan. Further reforms to the planning system are expected in 2025, with new duties for plan makers to “take account” of LNRSs as outlined in the Levelling-Up and Regeneration Act (LURA) 2023.	Change Policy HC2 part 5 c to read *c. provide multiple benefits, including recreation, food growing, SuDS, improvements to biodiversity nature recovery and links to, create, maintain and encourage high quality green infrastructure, as well as any blue infrastructure, on and adjacent to the development site.*

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HC2	ECC as the Highways and Transportation authority welcome the designation of local green spaces (LGS) within Policy HC2 parts, in accordance with the NPPF (December 2024). However, note a number of the proposed sites as listed in Appendix 1 and 2 and on the policies map include land within the public highway or with highways rights, based on ECC's highways and transportation records. ECC notes that NPPF Paragraph 107 states that Policies and decisions for managing development within a Local Green Space (LGS) should be consistent with national policy for Green Belts set out in Chapter 13 of the NPPF (with a footnote excluding provisions to grey belt and previously development land). ECC seeks confirmation that local transport infrastructure would be permitted within the LGS, consistent with NPPF, Paragraph 154 part h) points ii and iii. If local highway infrastructure schemes/measures are not exempt from being permitted within a LGS designation, ECC request the removal of the highway land from those designations to ensure potential future highway improvements can come forward, with any design sensitive to the local environment.	BC to confirm that engineering works / local transport infrastructure and improvements are exempt from the Policy HC. If not, then BC to engage ECC and to remove the land with highway land/ rights of way from the proposed Local Green Spaces. This is to enable any future highway improvements and accessibility measures to come forward, in accordance with the roles and responsibilities of the highways and transportation authority To assist BC, ECC as can provide mapping information for boundary changes to remove public highway and land with highway rights from the Local Green Space designation, if necessary.
Policy HC2 Part 9	The lead Authority for Education (including early years and childcare) seek changes to Part 9 to clarify that not <u>all</u> of criterion "a to c" need to be met and recommend inserting the word "<u>or</u>".	Change to read as follows.

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(Education playing fields)	This is necessary to provide to clarity and consistency and to be reasonable in responding to a range of circumstances and planning applications. A further change is required to part 9a, with the deletion of text to make it more succinct, relating to a specific project / planning application. As previously advised in response to the wBLP.	*9. Playing fields associated with education establishments are identified on the Policies Map with the notation HC6 and listed within Appendix 3. These will be protected from development, unless:* *a. The development ~~forms part of a planned programme of service and infrastructure replacement which~~ will result in replacement playing pitch provision of equal or better quantity and / or quality on an alternative site nearby; or* *b. The development is for education and/or sports provision, and opportunities to ensure the remaining pitch provision is of a high quality are incorporated into the proposals; or* *c. As part of the change of use or redevelopment of individual education facilities.*
Paragraph 2.38 and 2.39	ECC recommend the Paragraph are expanded within the context of the importance of green infrastructure within the planning system to support sustainable development in a number of ways as set out in NPPF Paragraph 20d, 96, c, 164a, 199 and 188, 156c and 159). This includes major housing developments on Green Belt land to provide new or improved public green spaces, ensuring residents have access to quality green spaces nearby. These improvements must enhance the landscape, support nature recovery within the ELNRs, and meet local or Natural England standards for Accessible Green Space and Urban Greening Factor provision.	ECC recommend consideration for development to have regard to *National Green Infrastructure Frameworks Accessible Green Space Standards"* to encourage compliance with this policy.
Paragraph 2.42	Recommend further clarification is provided in the supporting text, noting that Education work within the DfE stringent requirements in relation to playing fields.	Change Paragraph 2.42 to read:

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		2.42 An analysis of the need for playing fields associated with educational establishments will be undertaken on a case-by-case basis, taking account of the type of asset and any existing provisions. If no alternative provision or reinvestment is to be provided, permission will only be granted where an assessment has been undertaken which has clearly shows the facility is inappropriate for alternative community uses or is surplus to requirements.
Strategic Approach to Education, Skills and Learning Policy **HC3** Point 1	ECC as the lead Authority for Education (including early years and childcare) recommend the reference is changed to recognise which authority / body the policy is referring to. Part 1 makes reference to schools and other educational facilities. However, this should also reference skills facilities to include private skills providers who deliver apprenticeships and other qualifications.	Recommend the following change to Policy HC3 point 1 to read: *'The Council will work with the lead Authority for Education (including early years and childcare) ~~Authority~~ and other education and skills development providers to provide new, continued, and where appropriate, enhanced provision of schools and other educational and skills facilities which seek to improve the quality and choice of education, learning and skills development opportunities in the Borough.'*
Policy HC 3 Part 4	The lead Authority for Education (including early years and childcare), raise concerns regarding the policy which as written is not transparent with regards to the need to secure land and it could be taken that on-site provision is developer built rather than also via financial contributions, as set out in ECC's Developers' Guide to Infrastructure Contributions (the Developers Guide) . It is recommended that the policy specifically has regard to the Developers' Guide) which is the basis for establishing the additional	ECC recommend change policy HC3 Part 4 to read: *4. All applicable developments will be expected to contribute proportionately towards education (including early years) ~~and childcare,~~ provision, having regard to ECC's Developers' Guide to Infrastructure Contributions (and successor documents). Suitable land for education and / or early years and childcare use, to meet on-site and wider strategic need, will also be secured from appropriate developments. ~~Where on-site provision of education or early years and childcare is not~~*

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	requirements for education provision when considering new developments in emerging local plans and planning applications in conformity with national policy. Please refer to ECC's response to the Draft Plan Part 1 and specifically policy SG1, E1 and Section 8 policies INF1, INF2, INF3 and ECC's proposed new policy INF4 (Education establishments). Please have regard to the following guidance published since the Draft Plan Part 1 consultation to inform plan preparation: ECC's Local and Neighbourhood Planner Guide to School Organisation 2025 *Essex New Schools Design Principles (2025)*	~~*required, applicable developments will be expected to contribute towards off-site provision having regard to the latest standards for infrastructure contributions.*~~
Policy HC3 Suggested new Part 5	ECC suggest BC consider inserting a new part 5 regarding the eventuality where planning permission may be refused.	Suggested New part 5. *Where it is not possible to address a deficit in education provision through the on-site provision of a sustainable school and/or early years setting, or through developer contributions towards a feasible scheme for the expansion of an existing school and/or early years setting, planning consent may be refused.*
Paragraph 2.48	The reasoned justification should be extended to refer to fully reflect the Education provision to be planned for, for consistency with the NPPF and to support Skills and learning including Adult Education, as well as provision of youth services and libraries (NPPF Paragraph 101). Education provision should include early years and childcare, primary and secondary, post 16, SEND, Further Education and Adult Education,	Change to read *2.48 The retention of existing education facilities is an important objective of the Local Plan. The colleges, schools (including SEN) and early years provision and Adult Community Learning provide education provision to the whole community and contribute significantly to the*

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	namely Adult Community Learning and wider skills provision. This should also be expanded to includes provision for Libraries and Youth Services. ECC recommend that this policy and section is reviewed as a whole having regard to ECC's response to Reg 18 responses to the IOCP and Draft Plan Part1 (section 8 and policies INF1-4) and engage ECC and have regard to the requirements in the Developers' Guide. This is to ensure all services and requirements are addressed, noting the Developers' Guide covers a range of services including Libraries and a framework for securing Employment and Skills Plans.	*local economy. This is supported by the wider culture and community provision provided by libraries offering cultural, lifelong learning and skills and access to services within the community; and the provision of youth services.*
Paragraph 2.49	The Reasoned Justification should be updated to reflect ECC's comments in response to Policy HC3, and to ECC's Education and EYCC and Skills responses to the Draft Plan Part 1, which continue to apply. Reference should be added to the EYCC Annual Childcare Sufficiency Assessment, which is published to assist parents EYCC Providers and ECC in assessing their requirements. This includes the evidence base requirements, SEND and response to policies INF1- INF3 and suggested new policy INF4. ECC recommend that the Plan should have regard to ECC's additional guidance, including new Essex New Schools Design Principles (2025) which is now being applied and available on the Essex Design Guide website. ECC has provided some text changes, however BC will need to	Change to read *2.49 Essex County Council (ECC) as the lead Authority for Education ~~Authority~~ has the responsibility for early years and school place planning, including SEND. Through ~~this process ECC identifies the need for early years and school places and identifies surpluses or deficits through~~ their annual 10 Year Plan for School Places ECC forecasts change in pupil numbers based on a number of factors including census data, number of places offered for the latest school year, historical trends and GP registrations. The number of additional pupils likely to be generated by new housing growth is also considered within the forecasts. The 10 Year Plan makes reference to additional provision proposed in the Local Plan to accommodate planned growth. Whether the change of use or redevelopment of independent schools would be considered surplus to educational requirements will be considered on a*

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	review the text and position with ECC under the duty to ensure alignment and a consistent approach. With reference to the response to Policy HC3 above, new Paragraph are recommended to have regard to the Developers' Guide, which is the process for establishing the additional childcare and pupil place requirements arising from new development being considered in emerging local plans or planning applications, including calculations, land take, contributions and site suitability checklist. Please note and have regard to the new ECC's Local and Neighbourhood Planner Guide to School Organisation 2025	*case-by-case basis. In respect of EYCC, also prepare an Childcare Sufficiency Assessment which looks at local demographics, demand and the quality of childcare available across Essex* Insert new Paragraph: *2.50 ECC's Developers' Guide to Infrastructure Contributions, sets how the Education requirements for the provision of new schools, land requirements, and indexed linked contributions generated, and site suitability checklist to be met in developing new educational facilities (including EYCC), to accommodate growth. This is reviewed and kept up to date in accordance with changes by Department for Education, such as provision for SEND and Early Years and Childcare.* *2.51 The Council will work collaboratively with developers, the lead Authority for Education and other relevant bodies to deliver the schools required to support the growth arising from this plan.*
Policy HOU2	Policy HOU2 is supported and the ECC Specialist Housing team welcome the changes to Policy HOU2 with reference to ECC's response to the Draft Plan Part 1.	
HOU4 Reasoned Justification	Suggest the presentation of the Reasoned justification for HOU4 (Gypsy and Travellers) is reviewed and simplified for clarity and references to Travelling Showpeople is minimised (for example paragraphs 3.335 and 3.36)	Suggest remove reference to Travelling Showpeople.
HOU4	Comment from the Essex County Traveller Unit ECC note and support BC new policies HOU4 and HOU5 to meet their local housing need in full for the provision of 135 gypsy and traveller	BC to review the policy and supporting text to ensure the correct terminology is applied in all references to sites, pitches, plots and yards to reflect and be consistent with national planning policy.

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Gypsy and Traveller Accommodation supporting Text	pitches as set out in the Basildon Gypsy Traveller and Travelling Showpeople Accommodation Needs Assessment (Basildon GTAA). ECC recommend further changes, including a review of the terminology in policy and supporting text, to ensure this aligns with the new Planning Policy Statement for Travellers Sites (December 2024) and the Basildon GTAA (2024). For example the LPA should set "pitch" targets for gypsies and travellers and "Plot" targets for travelling showpeople. It should be noted that reference to a "site" may contain more than one pitch or plot respectively. ECC recommend reference is made to the number of pitches or plots on a site. The following are examples and areas to review and update • Part 1 – change to use the correct terminology of "Pitches" and delete reference to "plots". Plots concerns provision for "Travelling Showpeople" which is covered in policy HOU5. • Part2 change to use the correct terminology, gypsy and traveller provision concerns "pitches" located on "sites", as such BC need to find 235 "pitches". • Part 2 "a" and "b" – Whilst welcome the concept of provision distributed across new development it is recommended that BC expand the policies and text to clarify the rationale for the quantum of new provision within allocation (i.e. 1 pitch per 100 homes on a	For example, the policy concerns gypsy and traveller provision and refers to "plots", as noted above. Change Policy Part 1, 2, 2a and b to read to read: *1. Proposals which fail to protect existing Gypsy and Traveller sites or involve a loss of pitches~~/plots~~ will not be permitted unless it can be demonstrated that they are no longer required or equivalent alternative provision can be made.* *2. The Council will make provision for at least 235 additional <u>pitches</u> ~~sites~~ over the Local Plan Period. To meet this need:* 2a and 2b – recommend BC provide the evidence to substantiate the proportion of pitches on a major new development sites and recommend having regard to an inclusive approach. Clarification how the sites with the pitches will be brought forward, funded, implemented and delivered, for a range of tenure mix, including social provision. Part 3 ECC recommend consideration given to the maximum number of pitches on a site and the Essex Deign Guide / Traveller Site guidance.

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	strategic allocation), having regard to the need for an inclusive approach. Clarification is required on how the sites will be brought forward, funded, implemented and delivered, for a range of tenure mix, including social provision. Please note this is not the role or responsibility of the ECTU. Part 3 – locational criteria It is recommended that the site criteria has regard to the Gypsy and Traveller and Showpeople Guidance within the Essex Design Guide, particularly the need to minimise incompatible uses. Part c - Suggest provide a maximum size - see Essex Design Guide.	
Paragraph 3.20	The Paragraph and section incorrectly refer to the *South Essex Gypsy Traveller Accommodation Assessment 2024 (GTAA 2024)* which should be the *Basildon GTAA*. .	Change the references from ~~*South Essex*~~ to *Basildon GTAA* and apply throughout.
Paragraph 3.21	Paragraph 3.21 states the following. *Therefore, there is a need for the Local Plan to make provision for at least 235 Gypsy and Traveller households which meet the planning definition and up to an additional 67households which do not meet the planning definition*. Clarification is required on how BC are to plan for the identified 67 household that do not meet the planning definition.	Review and update the approach to planning for travellers who do/don't meet the Traveller definition, to align with the Planning Policy Traveller Statement 2024, which removed requirements for separate number for gypsy's and travellers no longer meeting the "planning definition". This should simplify the supporting text and policy wording.

Section / Policy Paragraph and page number	ECC COMMENTS – please consider the following matters	Recommended policy / actions and changes
HOU4 Policy -Part 3 f and Policy HOU5 and HOU5 Policy Part 3 g	<u>The Lead Local Flood Authority</u> Both policies have the same wording as follows. HOU4 Part 3 f*) ensure that future occupiers would not be subject to significant adverse environmental impacts including no significant risk of land contamination or poor air quality or unacceptable risk of flooding;* HOU5 Part 3 g) *ensure that future occupiers would not be subject to significant adverse environmental impacts including no significant risk of land contamination or poor air quality or unacceptable risk of flooding;* The use of the word 'Unacceptable' is too ambiguous for the decision maker and open to interpretation. What is unacceptable could differ from person to person dependent on their view. Policy rewording on this matter is needed. Dependent on location the pitch/plot should not increase the existing flood risk of the area.	Reword policies to clarify what would be deemed "unacceptable" i.e. flood Zone 3 and/or areas at 'high' risk of surface water flooding to remove ambiguity. Recommend that any applications for planning permission for sites for Gypsy and Traveller pitch/Travelling Showpeople plots must not increase flood risk both on and off site, to comply with NPPF. Suggest Change to read as follows for HOU4 3f and HOU5 3g *f)/g) ensure that future occupiers would not be subject to significant adverse environmental impacts including no significant risk of land contamination or poor air quality, or <u>located in flood Zone 3, areas of "high risk of surface water flooding</u> ~~risk of flooding;~~*
Policy HOU5 Gypsy and Traveller Accommodation	<u>Essex County Traveller Unit (ECTU)</u> ECC note and support HOU5.	The ECTU recommend further changes, including a review of the terminology in policy and supporting text, to ensure this aligns with the new Planning Policy Statement for Travellers Sites (December 2024) and the Basildon GTAA (2024). It is recommended that the site criteria has regard to the Gypsy and Traveller and Showpeople Guidance within the Essex Design Guide, particularly the need to minimise incompatible uses.

Section / Policy Paragraph and page number	ECC COMMENTS – please consider the following matters	Recommended policy / actions and changes
Policy Omission	Policy Omission - Digital Connectivity It is strongly recommended that the new Local Plan includes a policy relating to Digital Connectivity, as referenced in the NPPF and set out in ECC's response to draft Plan Part 1 and evidenced in ECC's response to the 2023 IOCP. To assist with the evidence base for this policy, and as an update to page 44 of ECC's response to the Draft Plan Part 1, the following mapping information (shapefiles) can be provided: • No Gigabit Broadband – highlighting premises with no existing Gigabit commercial coverage or planned Gigabit commercial coverage from operators working in Essex. These premises are classed as Gigabit White prems. • Gigabit Broadband Capable – highlighting premises with existing Gigabit commercial coverage that is expected to enable premises to receive Gigabit broadband speeds from broadband operators working in Essex. These premises are classed as having "Gigabit broadband". Planned Gigabit Broadband – highlighting planned commercial coverage that is expected to enable premises to receive Gigabit broadband speeds from operators working in Essex.	Include a Digital Connectivity policy, with reference to ECC's Responses to the IOCP and Draft Plan Part 1, and having regard to the NPPF and Essex Design Guide/ Digital Connectivity section. To engage ECC for mapping information.
Integrated Impact Assessment (Sustainability		

Section / Policy Paragraph and page number	ECC COMMENTS – please consider the following matters	Recommended policy / actions and changes
Appraisal (SA) / Strategic Environmental Assessment (SEA)) Scoping Report, Draft Framework, and Initial Assessment of Strategic Options Feb 2025 Habitats Regulations Assessment Scoping Report Feb 2025		
	The IIA and HRA should be updated to reflect the ECC's response to Draft Plan Part 1 and Part 2, including having regard to the additional policy guidance and information above in section ECC policies and standards and other Guidance at March 2025 above.	To update the HIA and HRA with regard to ECC's responses to the Draft Plan Parts 1 and 2.