

**Issues & Options Consultation**  
Billericay Action Group  
Version 1.2, December 2023

<b>Version History</b>		
<b>Version</b>	<b>Date</b>	<b>Comments</b>
1.0	4 <sup>th</sup> September 2023	Submitted for the Issues and Options Consultation
1.1	14 <sup>th</sup> September 2023	Minor additions and refinements before sharing with stakeholders.
1.2	10 <sup>th</sup> December 2023	Further information about borough's Green Belt, and minor re-organisation for greater clarity when describing radial sectors of Billericay (N, SE, SW)

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# 1. Introduction

We warmly welcome this 'Issues and Options' consultation and the chance to influence the new Local Plan before it is drafted.

The hugely abridged comments we submitted via the portal should be seen as a summary of this, our principal submission.

BAG was established to protect Green Belt around Billericay, and our response to this consultation reflects our continued desire to protect Green Belt around our town, and by extension the rest of the borough.

Basildon borough is extremely fortunate to lie in one of the Green Belts. It means we are able to moderate our growth in a way our neighbours beyond the Metropolitan Green Belt – such as Chelmsford and Maldon, are not.

## 1.1. Plan Period

We believe that, on balance, it will be better to extend the Plan Period so that it starts a year or two earlier – for instance a 17-year Plan Period 2025-2042 rather than the currently intended 2027-2042.

The downside is that we would need more years of Objectively Assessed Need (OAN) at 1,000 per year to take into consideration when selecting our Housing Target (though of course we not obliged to meet OAN).

Basildon has a huge number of granted but unbuilt Planning Permissions, around 7000<sup>1</sup>, however due to poor market conditions, developers are not bringing many of these forward.

2023-24 and 2024-25 are likely to see a low rates of build, but it seems likely that this will be very high numbers following on from that. We believe such a period of high delivery needs to be captured in the Plan Period.

The most important reason for this is quite simply that we must plan for this level of population growth as best we can, and the Local Plan is our best tool.

The second is that we are likely to deliver a high proportion of our annual OAN in this period (despite increasing the total OAN for the Plan Period), much of it on brownfield. If this means we deliver a higher proportion of our increased OAN across the extended Plan Period, this may help our Plan at the Inspection stage.

If, by the time we issue our first draft Plan, it doesn't look like we will be building large number of homes before 2027, then this argument weakens.

## 1.2. Housing Need

### 1.2.1. National

Our view, explored in more detail in 2 is that the country probably has enough houses and we build enough new homes each year.

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<sup>1</sup> Basildon Housing Delivery Test Action Plan and Five Year Housing Land Supply Update, Report for Cabinet on 13<sup>th</sup> July 2023, Page 153 of the Report Pack - [basildonmeetings.info/documents/g7771/Public reports pack 13th-Jul-2023 19.00 Cabinet.pdf?T=10](https://basildonmeetings.info/documents/g7771/Public%20reports%20pack%2013th-Jul-2023%2019.00%20Cabinet.pdf?T=10)

But the country does have a huge social and economic challenge around the price of housing, a problem we believe largely stems from *Landlordism*, our housing stock is increasingly concentrated in the hands of investors rather than with local authorities (in the form of Council homes) – or owner occupiers.

This shift toward short term (AirBnB etc) and long-term private rental is a huge and perhaps insatiable inflationary pressure which can only be controlled and ideally reversed by government intervention.

#### 1.2.2. Local

As we describe in 3.3, the government's OAN algorithm triples local need, without any prospect of lowering the price of market, social or intermediate housing.

### 1.3. Green Belt and the Local Plan Housing Target

There is no way we can meet our contrived OAN without using Green Belt so we should set a Housing Target which does not meet OAN – using Green Belt as a legitimate constraint to meeting OAN, though we acknowledge that the availability of land, Green Belt or otherwise, must be raised at the 5-year Local Plan Reviews that councils are required to carry out.

### 1.4. Other reasons to moderate growth

We will outline several other good reasons why the council should not meet OAN – and a Local Plan that seeks to undershoot, must (like any Local Plan) have a consistent narrative from strategic statement, to its evidence base and policies.

- In 9 we make some arguments about social infrastructure constraints.
- In 10 we make arguments around our local economy
- In 4 the commuter infrastructure challenges faced by South Essex are discussed (together with some long-term opportunities)
- In 5 and 6 we discuss factors limiting potential growth in Billericay, and broad areas of Billericay
- In 4, 11 and elsewhere we argue that London's Green Belt is an unsustainable place to channel population growth.

### 1.5. If Green Belt is used

Although we don't want to lose any of the borough's Green Belt, the Council may choose to use some.

To mitigate the harms of this we've produced two sections:

- In section 7 we lay out a number of considerations in selecting any Green Belt sites to develop
- In section 8.1 we seek to influence the housing types in any Green Belt sites in order to promote more affordable (or less unaffordable) homes.
- In section 8.2 we make our case on how any Green Belt sites are designed in order that sites are as pleasant, healthy, sustainable and biodiverse as possible.

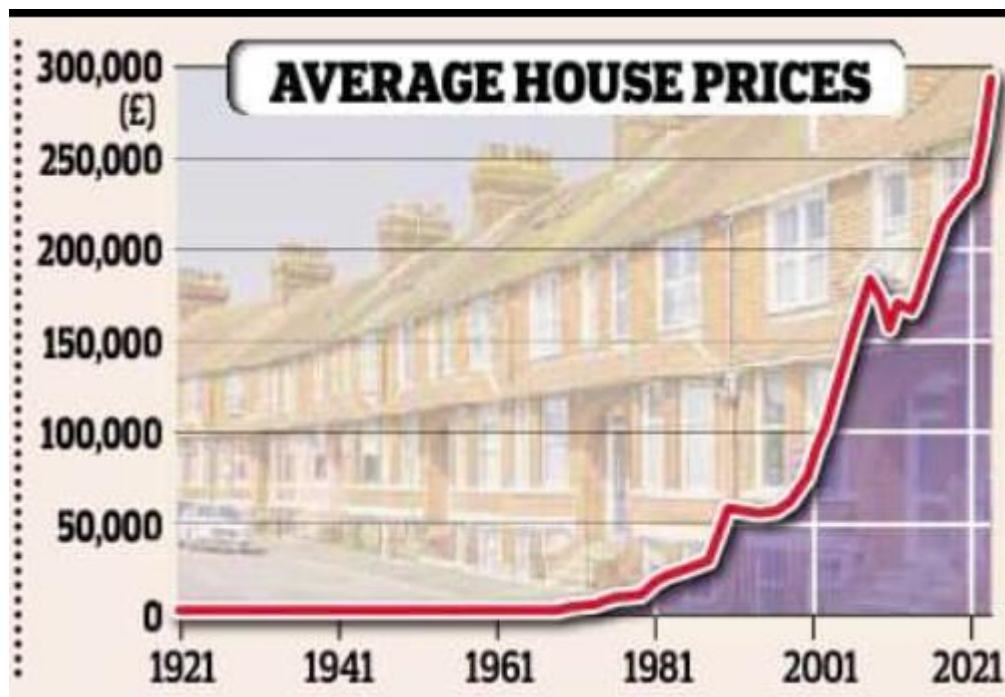
## 2.The Nation's Housing Crisis

The cost of housing is the greatest social and economic challenge the country faces; the dominant narrative is, largely due to the influence of the housebuilding lobby, that this is a result of a shortage that should be addressed by building huge numbers of market homes. It's an intuitive argument of supply and demand – but we disagree with this analysis.

### 2.1. Problem Statement - Rising Prices

In the late 1990s house prices were affordable to young people on modest wages. Over the period since, house prices have increased 400% (not allowing for inflation and increased wages) in that time.

What's going on?



Since 1997, the population has grown 16%, largely due to this having been a period of high immigration – but housebuilding has kept up, we built around 5 million homes, increasing the housing stock by 20%.

The 2021 census showed an average household size of 2.36, the same as 2001. This is not indicative of overcrowding. So this is not, primarily, a supply and demand issue (at least not in the way we're used to thinking about it), so a supply led solution won't work.

Clearly much of the house price rise since 1997 has been driven by a long period of low interest making debt cheap. But other factors are at play.

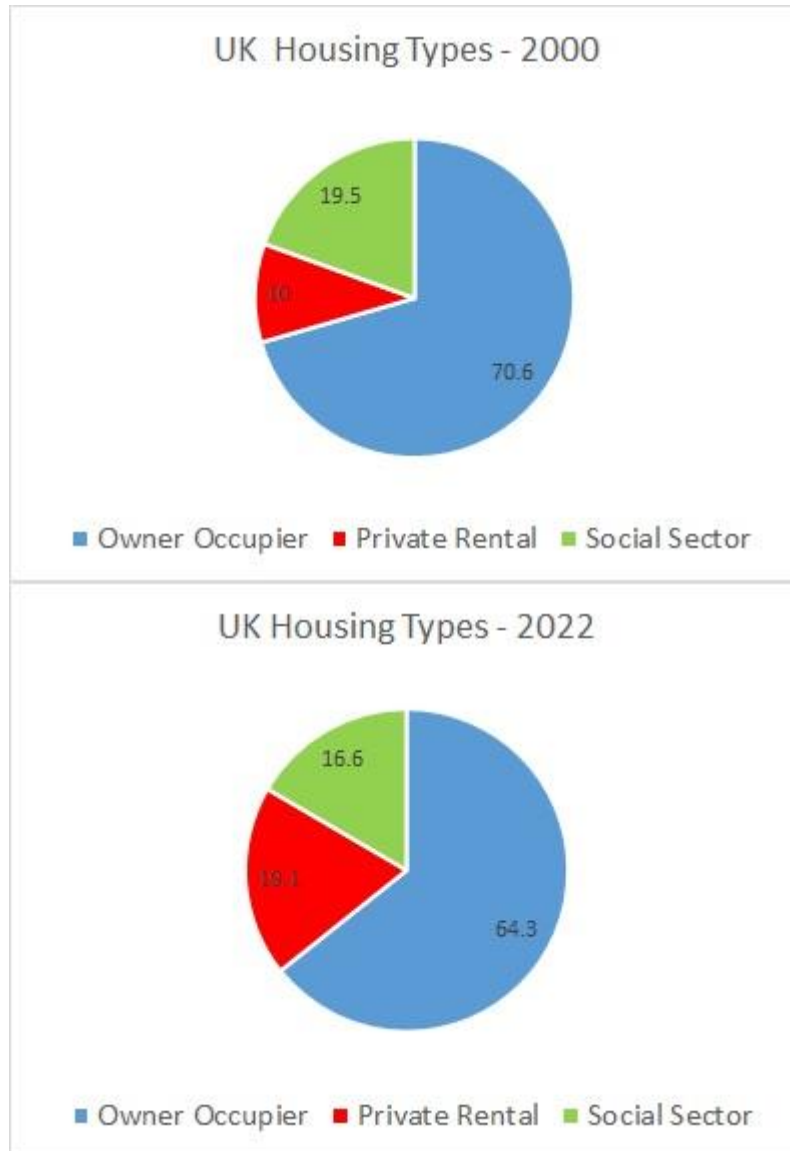
In a nutshell, the problem is tenure. The problem is not so much a shortage of housing, but increasingly unequal access to it, our housing stock is in the wrong hands.

In the period 1997-2021 the private rental sector grew from 10% of our housing stock to 19%. 2.5 million houses shifted from owner-occupiers and



council house stock to investors. The proportion of homes held by owner occupier and as council tenancies has, of course, correspondingly fallen.

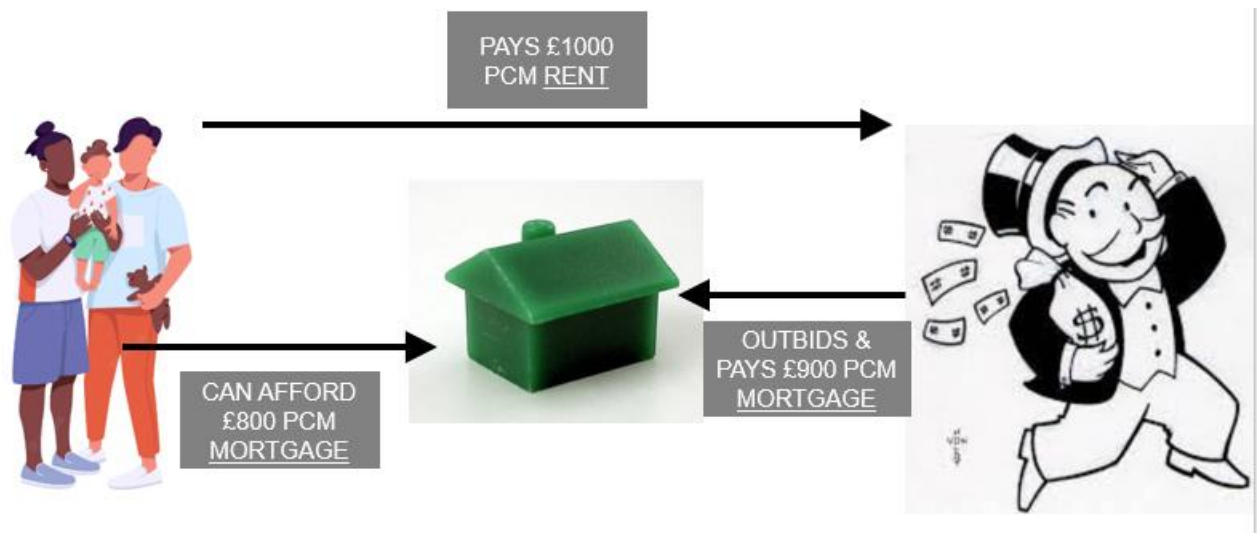
Private letting is incredibly inflationary as investors can usually outbid those wishing to be owner-occupiers, and can never be satisfied. They will always be looking to expand their empires.



**Figure 1 - Adverse trends in UK house tenure**

Bear in mind too, that someone in private rental may be paying the landlord more than what they'd be paying – in mortgage payments – for the same house if it was still available to buy.





### A scenario illustrating problems in the UK housing market

This is Darwinian, trickle-up economics that cripples family finances and does so much to limit GDP growth. Where will this end?

#### Case Study: AirBnB in Inner London

Several Inner London boroughs (for instance Camden<sup>2</sup> and Hackney<sup>3</sup>) have experienced a steep and very recent fall in the number of school age children, and seemingly of their population as a whole.

Schools that were fully subscribed just a few years ago, now face being closed or merged. The reasons for this are not yet fully understood but the rise of AirBnB short term lets – essentially empty homes -is thought to be a significant part of the problem.

Research by the London Borough of Camden suggested that at least 7% of their housing stock, houses that would mostly otherwise be available for private rental by local residents, were listed on AirBnB and similar platforms.

#### 2.2. Average Household Size

It has to be acknowledged that population size and the insatiable involvement of investors is not the only factor affecting demand.

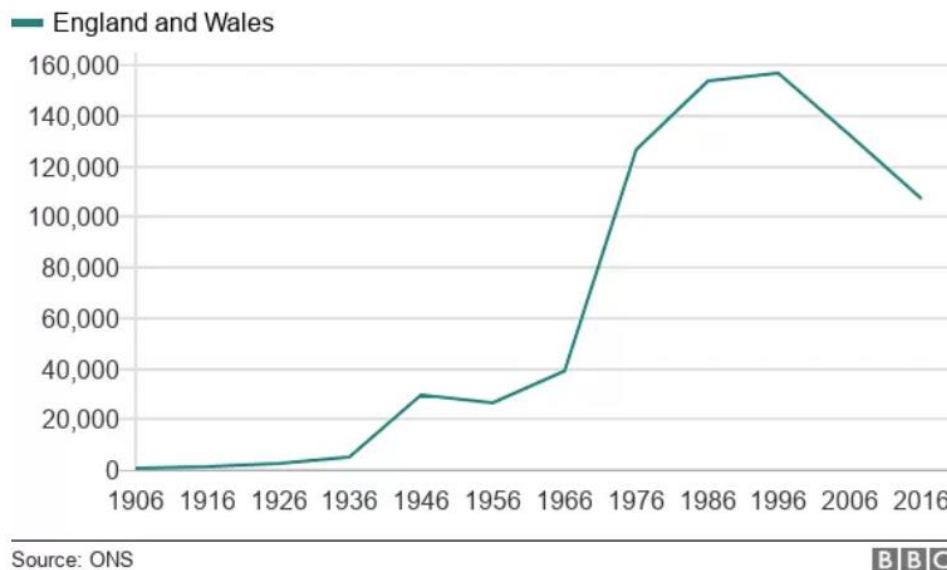
The average household size in the UK has fallen over the years (3.3 in 1951, reflecting factors like people having fewer children and an increase in family break-up. It was 3.3 in 1951, 2.9 in 1971 and 2.36 in 2001 and 2021.

There is an argument that we should build more in order to better account for family break up.

<sup>2</sup> [In Empty Homes Week 2022 we call for action and investment | Action on Empty Homes](#)

<sup>3</sup> [Primary schools potential closure / merger plans | Hackney Education](#)

## Divorces per year in England and Wales



**Figure 2 - Divorces per Year in England and Wales**

Without wishing to oversimplify, we would note two things:

- the first is that divorce rates have plateaued in recent years so we may not need to bear down further on average household size.
- The second is that if we do, then recent reports<sup>45</sup> show that there are about a million empty homes and enough brownfield land to build a million more.

Government intervention to address these issues would make huge numbers of homes available (albeit without meaningfully affecting house prices).

### 2.3. Government and Opposition Housing Policy

Neither the government or opposition have ever, to our knowledge, come up with anything like a 'problem statement' for the housing crisis – but they both favour a supply led solution to the problem. Whatever the problem is.

The census confirms that the UK needs to build approximately 150,000 homes a year, a figure we already exceed. This discredited the Office for National Statistics (ONS) 2014 projections which estimated the UK needs 300,000 per year.

However, both the government and opposition cling to the discredited 300,000 figures. Why?

We have already argued that as this isn't a normal supply and demand issue, that a supply led solution – ie increasing the housing stock by around 1% a year (300,000 houses) rather than 0.5% (150,000 houses) is not going to meaningfully affect house prices.

There are many boroughs (those most profitable for developers) where OAN, based on the same discredited data, has been met over an extended period –

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<sup>4</sup> [National Empty Homes Week 2023 sees call for action on One Million homes nobody lives in | Action on Empty Homes](#)

Colchester (beyond the Green Belt) for instance - but house prices there, have risen at the same dreadful speed as elsewhere.

We're barking up the wrong tree.

Even if it were an appropriate target, it would not succeed. At a national level, the industry will rarely ever build anything like 300,000 per year; the industry works on a "sell one - build one" mantra, that manages cash flow, regulates costs (especially workforce size) and avoids any reduction in sales price.

We see this in Basildon now, we have around 7,000 unbuilt permissions granted (mostly brownfield, but Green Belt too), but the developers are land banking them until market conditions improve.

When they do improve, developers will usually cherry-pick the Greenfield sites first and deprioritise bringing forward the less profitable sites (such as brownfield).

#### **2.4. What is government policy trying to achieve?**

In May 2023, a BAG volunteer took part in a seminar organised by the Westminster Social Policy Forum. Other participants included developers, economists, an MP and a director from the Department of Levelling Up Housing and Communities.

Developers and the DLUHC director made many platitudes about house prices and were critical of "NIMBIES" for affecting supply.

The BAG representative was able to ask Cathy Francis, a director at DLUHC, what DLUHC and government policy on house prices is.

**BAG volunteer:** "I'm NIMBY. I want house prices to fall very significantly (a personal view). Does the department have an opinion on how far and how fast it would like house prices to fall?"

**Cathy Francis, DLUHC:** "I think we want more people to be able to afford housing. I think there is definitely a downside to significant falls in house prices, you'll find people trapped in negative equity and all of that.

We need to do more to make homeownership available to more people. We don't have a stated policy ambition (that is) to see house prices fall. You know, that's not what we're working to. We are working to increase supply.

You know, we put billions of pounds worth of funding into the housing system through infrastructure funding through affordable homes grants. And that remains our priority to increase supply and to build the homes where people want to live."

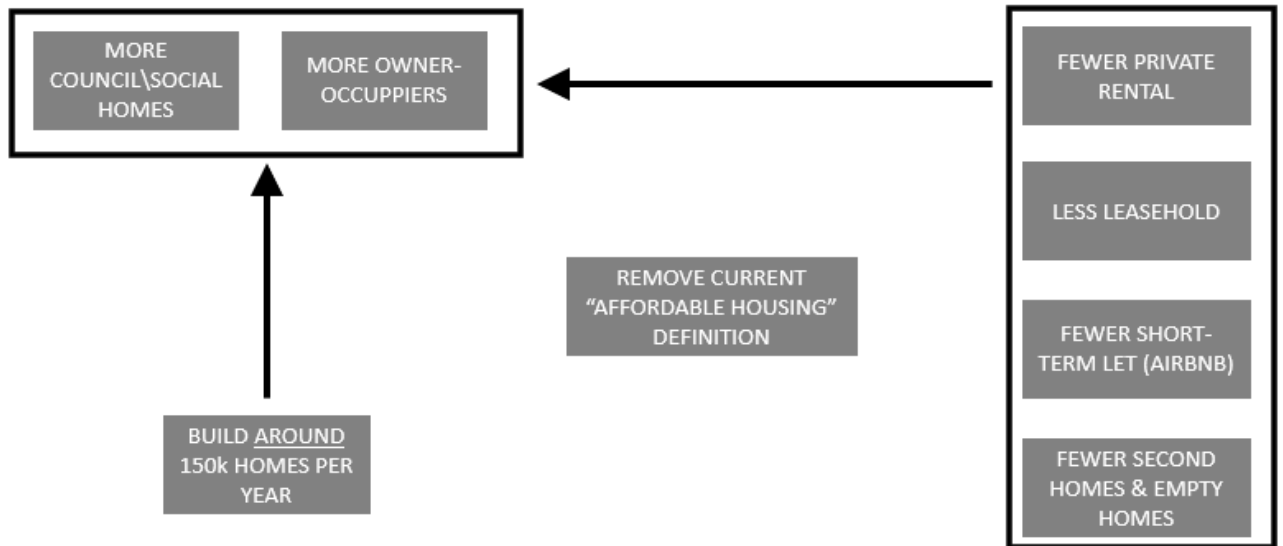
The policy of hyper-supply comes with many huge and obvious harms to the environment and to communities. All this without any thought of what outcomes we are trying to reach.

Surely there must be a cost\benefit analysis? You would never get away with such an approach in a normal work environment.

**2.5. What should government do?**

The country will need to build large numbers of houses each year for the foreseeable future, but the 300,000 per year figure is discredited and the harms far outweigh any limited benefits. The 2021 census suggests 150,000 is appropriate.

We don't have a view on the cost\benefits breakdown of reducing house prices, but the government should at least be looking at stabilising prices and intervening to reverse recent trends in housing tenure.



**Figure 3 - Aspects of desired central government housing policy**

### **3. Basildon - Right Number & Right Place**

In our view our housing target should be as based on the number of homes we think we can *reasonably* deliver (e.g. without excessive non-GB developments such as proposed in Basildon Town Centre) without using Green Belt (above and beyond those given approval by Planning Inspectors at appeal).

In that way the right number and right place are interdependent – and indeed they still will be if you believe we should build more homes by going into the Green Belt.

It will be easy to deliver the number of homes our local population needs over the Plan Period without using Green Belt.

This Local Need is about 4,500 over 15 years based on births and deaths, or 6,500 if we were to accommodate in-migration from London which continued at recent rates (this net in-migration from London has largely been a consequence of fairly high rates of house building).

However, it would probably be impossible to meet the 'one size fits all' OAN algorithm of around 15,600 over 15 years, without using large areas of Green Belt - unless the government changes its approach to the way it sets its advisory OAN.

#### **3.1. Few benefits to hyper-supply**

We could de-designate enough Green Belt to meet OAN but we would only get the downside of overpopulation – we would not deliver the genuinely affordable social homes people need and we would not lower or even stabilise house prices.

There are many adverse impacts of meeting OAN, and very few benefits.

#### **3.2. Recent rates of housebuilding.**

In the ten years 2011-2020 Basildon has seen an average of 468 homes built per year, going well beyond Local Need (births and deaths – see below) and increasing in-migration.

In Billericay we have seen annual housebuilding rates of around 50-60, enough to meet the town's Local Need.

#### **3.3. Understanding OAN**

The term "Objectively Assessed Need" (OAN) is a misleading misnomer, there is no relationship between OAN and Need, let alone between OAN and economic, social and environmental sustainability.

The contrived OAN outputs are inflated by two factors, the first is the algorithm itself, and the second is the discredited 2014 data\assumptions that the government still insist local authorities feed into the algorithm.

The 2014 data suggests a national requirement for 300,000 houses per year, however more recent projections – confirmed and validated by the 2021 census – suggest 150,000 is more appropriate. The 2014 data inflates OAN locally as well as nationally, as we will see.

The Basildon Council leadership have criticised both the algorithm and inaccurate 2014 data on several occasions.

The outputs from the algorithm can be broken down into three components:

- Local Need (aka Natural Change): The number of homes required to house local people, taking into account births and deaths.
- Migration Figures from the ONS: These include Local Need but also extrapolate past in-migration into the future. This net in-migration has been largely a result of our fairly high levels of housebuilding. The town has grown, so the rationale of these ONS migration figures is that we must continue to grow at the same rate.
- The 40% affordability uplift.  
The OAN Standard Method includes an affordability uplift of up to 40%, an uplift proposed by the development industry (Savills and Lichfields<sup>6</sup>). Basildon is subject to this maximum 40% uplift.

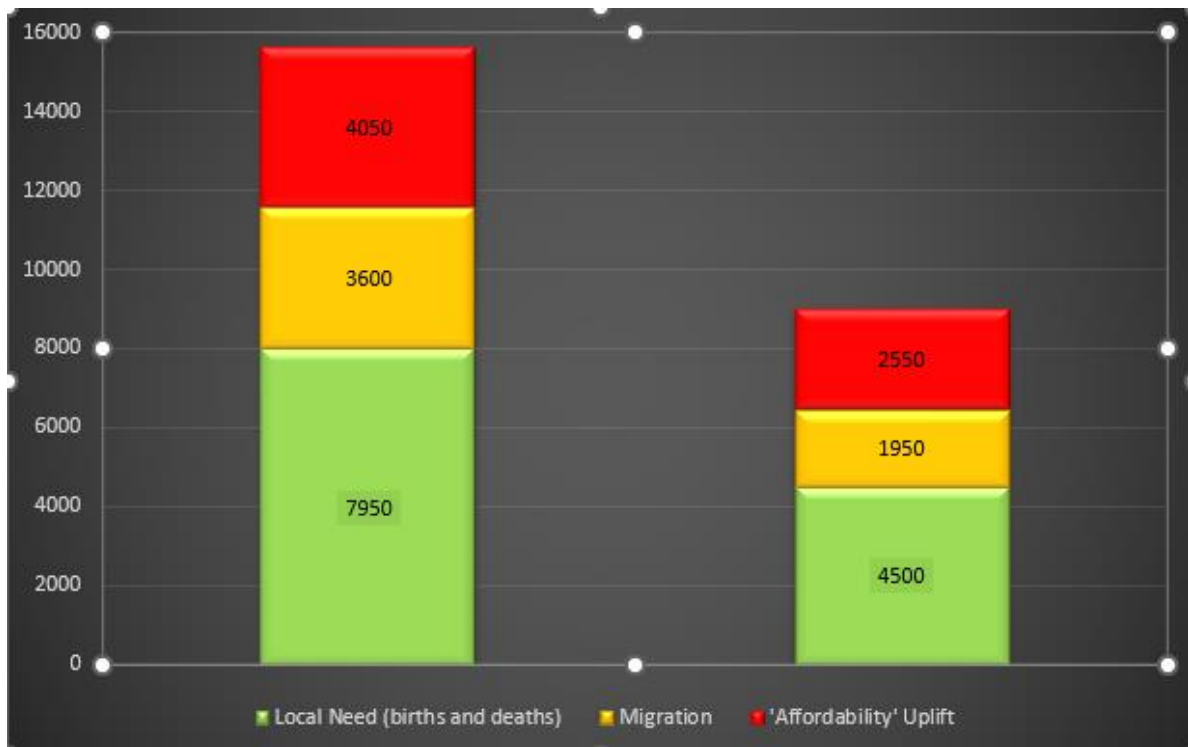
It goes without saying, that the affordability uplift has enormous impacts on the distribution of growth, with enormous implications for the areas experiencing the larger scale housebuilding and transfer of population. So, in terms of upside, what reduction in house prices is the government intending to achieve, and in what timescale?

But there's no answer to this - the uplift does little or nothing for affordability, indeed, as described in section 2, neither the government or the building industry wish to see lower house prices, and there's nothing the Council can do to meaningfully influence the cost of housing. The Affordability Uplift simply serves to channel growth to expensive and generally less sustainable parts of the country - such as London's Green Belt.

All this amounts to regional planning by algorithm, an algorithm proposed by a self-interested industry and accepted by national politicians.

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<sup>6</sup> Section 15 [Title \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)



**Figure 4 – 15-year OAN Components - 2014 data (left) and 2018 census-confirmed data (right)**

**Table 1 – Approx OAN figures for 2027-42 (and per year, in brackets)**

	Local Need	Migration ONS	With Affordability Uplift – FULL OAN
<b>2014 Data</b>	7950 (530)	11,550 (770)	15,600 (1040)
<b>2018 Data</b> Confirmed by the 2021 Census	4500 (300)	6,450 (430)	9,000 (600)

**Note:** In 2024, local household projections based on the 2021 census will be made available, and are likely to produce outputs for Basildon that are a little **lower** than the 2018 figures above. It is to be hoped that the government the allow local authorities to use these reliable up-to-date figures rather than the old, discredited 2014 data.

### 3.4. Right Place - Brownfield

In many ways this is already set for us, in that the minimum housing target we can set is the amount we can reasonably deliver using non-Green Belt sites.

The extent to which Basildon can moderate numbers, or in other ways improve the Basildon Town Centre developments is separate from the local Plan, though the Local Plan will reflect the results.

So, in this way distribution is determined by the availability of brownfield sites and Green Belt approvals (at appeal or otherwise) agreed before the Plan Period and delivered during it.

Any Green Belt sites the Council choose to allocate in the Local Plan will be on top of that.



As will be seen, we argue that any Green Belt sites chosen should be selected based on the particular merits of the sites – allocation should be largely (not exclusively) based on a “bottom-up” site-specific basis, rather than a “top-down” idea of how sites should be allocated.

#### 3.4.1. Mistakes of the past

The last local plan was developed on the mistaken basis that Green Belt could not be used as a constraint to meeting OAN, and that therefore we had no control over the Housing Target and must therefore use very large areas of Green Belt in order to meet it.

A top-down approach was adopted which began the process of allocating Green Belt on the basis that whole towns would be allocated growth according to their existing proportion of the borough’s population; so Billericay, which accounts for 19% of the borough’s population would get around 19% of the housing.

As the town has little brownfield, this meant that the Green Belt around the town would be disproportionately affected, and the intrinsic qualities of each site given very little consideration. The Local Plan Evidence Base was often ignored in allocating sites in Billericay (and perhaps elsewhere).

This approach was, in our view, unsound and would have been a major point of enquiry at the Examination in Public, had it gone ahead. Indeed, the Inspector expressed concern over this point in his initial pre-enquiry questions<sup>7</sup>. The planning officers who inherited the plan, and who probably had little knowledge of the background, struggled to answer and could only unconvincingly argue that each site had been considered carefully.

As described, the last local Plan allocated housing across whole towns based on current population and this was almost certainly unsound. A Local Plan approach which sought to allocate proportions of Green Belt development (rather than of all-development) proportionally seems understandable but would de-designate Green Belt in an arbitrary fashion and is again, probably unsound.

The acceptance that we do not need to meet OAN, and have a degree of control over our Local Plan Housing Target gives us much more freedom to deliver a good plan. Any Green Belt sites, must be selected on their own merits; broader considerations are of relevance but the allocation of Green Belt sites should be done mainly on a “bottom-up” basis.

#### 3.4.2. Availability of Brownfield

Opportunities to recycle previously developed land (brownfield) come forward all the time, but it is not always possible to identify these sites and their yield ahead of time.

The last Local Plan ran from 2014-34 and the first draft was published in early 2016. At that time, we were two years into the Plan Period and quite a number of developments had been identified which could count towards the

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<sup>7</sup> Question 1.6 - EX010 Inspectors Initial Questions (IIQs) to Basildon Council on the Basildon Borough Local Plan - December 2020

Plan; these included those with planning permission, and those which had already been delivered.

By the time the submission plan was published in 2018, we more than four years into the Plan period and this had of course grown, and by the time of adoption (if found sound in one form or another) in 2023, this would have grown again.

By contrast the first draft of the next Local Plan (2027-42), is due to be issued in 2024, three years BEFORE the Plan Period, so there may be some dismay at how little brownfield we have available.

However, by the time the Plan is examined, and then adopted in 2027, this figure will have grown considerably.

It's also worth noting, that as in the last Local Plan, Basildon will be able to include a "Windfall Allowance" to count towards the Housing Target, in order to account for some of the as yet unidentified brownfield sites that will inevitably come forward over the Plan Period. It is, as last time, likely to be in the region of 1,000.

### **3.5. Other Points**

At the time of writing, Councils must still demonstrate a 5-year housing supply, even if they have a Local Plan in place.

A high annual housing target, even if it is below OAN, makes it harder to demonstrate a 5-year Housing Supply. This challenge might arise if the sites identified to meet the housing target (be that OAN or sub-OAN) do not come forward in a consistent way – for instance due to market conditions, or due to developers gaming the system.

The government are reconsidering this so that Councils require a 5-year supply OR a Local Plan.

## **4. Constraints – South Essex**

South Essex falls entirely within London's Green Belt, with the administrative boundaries of Basildon and London being just 3.5 miles apart.

In some ways south Essex is unlike any other area of London's Green Belt in that it quickly reaches the North Sea, with the eastern part of south Essex, forming the Rochford Peninsula, isolated between the estuaries of the Thames and Crouch.

Partly due to this geographic factor, and partly as Essex was sparsely populated before the post-war period, the N-S links in south Essex are few in number and low in capacity, the radial commuter links to London are much more important, and better developed, but already at capacity and with little potential for improvement.

South Essex was sparsely populated until 1950, but since that time the area has urbanised to a tremendous extent to accommodate London's 'overspill' - the major new town of Basildon was built, while Billericay and Wickford grew exponentially from almost nothing.

This link with London, particularly East London, is an important part of how the area perceives itself, of its local identity; but for objective economic reasons the area has reached capacity - capacity having very little to do with 'space' - and is no longer a suitable place to channel the capital's 'overspill'.

For a long time, the Green Belt, offered our radial commuter links a degree of protection from overdevelopment, but though is now a lot of pressure to remove land from Green Belt to facilitate development close to London's periphery.

Although it is not one of the statutory five purposes of the Green Belt, it is worth bearing in mind that one of the original, and still relevant reasons for creating a Green Belt around London, was that by this would protect London's commuter infrastructure from growth at and around its periphery.

### **4.1. South Essex Rail**

BAG has engaged with Network Rail and the local franchise operators to produce a detailed study of the South Essex rail network (C2C and the Southend Victoria Branch Line), the challenges it faces and the very limited opportunities to improve capacity.

The study, shows the unsuitability of South Essex as a large place for large scale OAN growth. The study is available on our website: [Rail Topic Paper - BILLERICAY ACTION GROUP](#)

A summary has also been included as an Appendix (see 14) of this document.

There are however three potential major rail schemes (included as an Appendix, see 5) which would meaningfully improve south Essex capacity, albeit not during the Plan Period, and we think Basildon should consider lobbying for these.

There are two schemes that would benefit C2C, and another which would benefit the Southend Victoria branch line.

## 4.2. South Essex Road

### 4.2.1. Overview: Radial Commuter Links

South Essex' main radial commuter routes are, south to north, the A13, the A127 and the A12. The A127 Arterial Road in the centre is by far the most important.

It is understood that the A13 and A127 are the busiest A-roads in southern England, with the A127 facing the major handicap of having been de-trunked in the 1990s, becoming the responsibility of Essex County Council who lack the funds for any major investments.

### 4.2.2. Overview: North-South Links

South Essex has poor N-S links with only three classified roads heading north out of the area, all of them inland of the long broad Crouch estuary (the lowest crossing is the little bridge at Battlesbridge):

- A128 single-carriageway, from Tilbury through Brentwood to Ongar. This road links the A13, A127 and A12.
- B1007 single carriageway, **the only classified road to head N-S through Basildon borough** (unless you count the A132 heading ENE to the A130). This road enters the Billericay urban area as the A176 and heads out of it towards the fast-growing city of Chelmsford as the B1007
- The A130, a high-quality dual carriageway linking the A12 to the A127 and A13.

### 4.2.3. A127 Capacity

The A127 has over 70,000 movements per day (as of 2012), as busy as some motorways, but it is only a dual carriageway.

This figure is projected to rise to over 100,000 by 2036 and that estimate can only be based on lower population growth figures than currently anticipated (i.e. OAN) for the area.<sup>8</sup>

It should be noted that, due to the peninsula nature of south Essex, that this is a short road, a factor which compounds the impact of the traffic volume as there is not the space (and hence time) for the volume of traffic to be thinned out.

During the 2016 R18 consultation, Essex CC, Havering, Thurrock and TfL expressed concern<sup>9</sup> about the effect that growth in Basildon and south Essex would have on the A127.

The initial response to this was that the Submission Local Plan delayed the development of 3000 houses in south Wickford, east Basildon and Bowers Gifford to a time until unless a new grade separated junction, with link roads was built.

This was a reasonable response, but didn't go far enough. There does not seem to be any real potential to address the fundamental capacity limitations on other A127 junctions in the Borough.

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<sup>8</sup> [nevendon-a127-corridor-for-growth-paper.pdf \(essexhighways.org\)](#)

<sup>9</sup> 7.31 of the 2016 Draft Plan Statement of Consultation

There are aspirations for improvements to various junctions on the A127 (such as Fairglen on the A130), but nothing between Billericay's access points (west of the A176 junction) and London.

A project to straighten the A127 at the Fortune of War would be welcome, but the benefit would be to reduce pollution rather than to increase capacity.

Even an ambitious and expensive series of new and improved junctions would probably not be enough to make the route able to accommodate growth, this could probably only be achieved by widening the road for its full length, something that would cost billions and could not be achieved in the Plan Period.

#### 4.2.4. Lower Thames Crossing

The Lower Thames Crossing might deliver some benefits, but would, on balance adversely affect south Essex by reducing the resilience of our radial commuter links.



**Figure 5 - The Lower Thames Crossing would adversely affect resilience on the A127 and A13**

Once operational, traffic disruption on the new motorway leading to the new crossing would see traffic choose the A127-A128 and A13 as alternative routes to the crossing. This would be a relatively frequent occurrence and its impact severe.

#### 4.3. Conclusion

The railways, the A127 and other radial commuter links are over-stretched and cannot accommodate OAN-scale growth during the Plan Period.

## 5.Constraints: Billericay

Billericay is a historic market town which first received its charter in the 13<sup>th</sup> century; until the 1950's it was a tiny settlement consisting of little more than the High Street, an area since designated as a Conservation Area due to its historic and architectural interest.

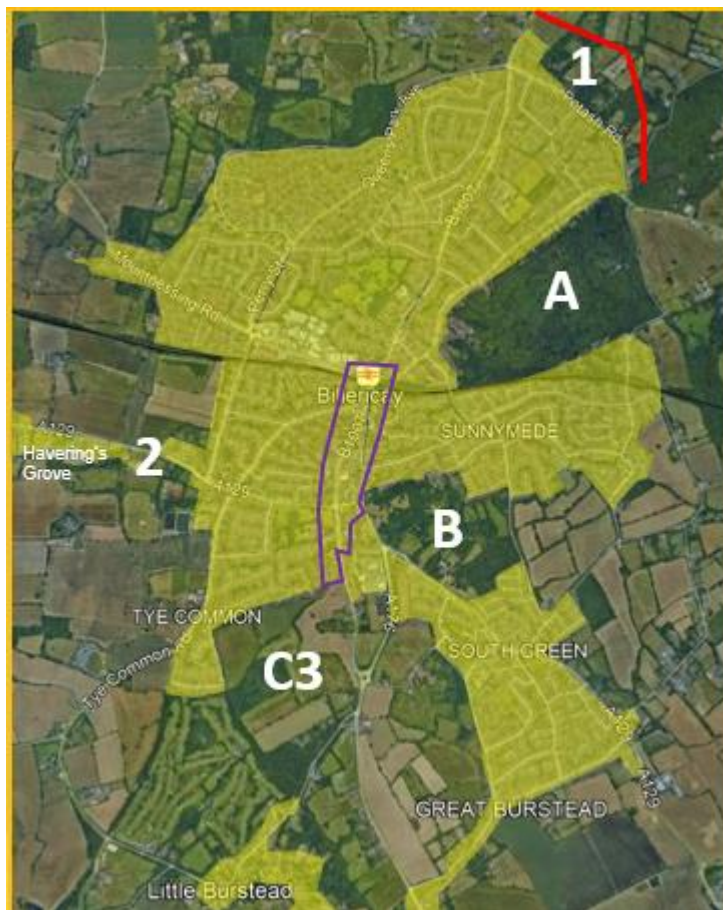
Like Basildon and Wickford, the town has grown enormously since the 1950's - typically with low or very low-density developments - and is now home to 35,000 people in 15,000 homes, around 19% of the borough's population.

Despite the exponential growth the town has experienced, its road network is still largely based on the medieval road layout.

### 5.1. Vital Areas

Some of the most important areas in the town's Green Belt are the three Green Wedges, and the Green Gaps which prevent coalescence with neighbouring towns.

These Green Wedges (lettered) and Green Gaps (numbered) are shown on the map below.



**Figure 6 - Green Wedges (lettered) and Green Gaps (numbered); some of the most important areas of our Green Belt. Billericay High Street & Conservation area is the purple box. A part of the borough boundary is shown in red.**

#### 5.1.1. Green Wedges

The countryside around the Basildon borough towns wasn't designated Green Belt until 1998, so Billericay is very fortunate in having three high quality



accessible Green Wedges that reach, or come close to reaching the High Street Conservation Area and which do so much to define the character of our historic town:

**A: Norsey Wood – Ancient woodland, SSSI, SAM etc.**

Comes within 400 metres of the central Conservation Area.

**B: Mill Meadows – Nature Reserve, part of which is an SSSI**

Reaches the Conservation Area.

**C: Laindon Road-Frithwood Lane Green Wedge**

Mixture of arable, Ancient Woodland and common land, highly accessible with Public Rights of Way (PROWs). This area separates the High Street Conservation Area (which it reaches) from the Little Burstead (a detached village) Conservation area, reaching both.

This area also acts as Green Gap 3 which separating Billericay from Little Burstead.

#### 5.1.2. Green Gaps

At the heart of Green Belt policy is the requirement to prevent coalescence between settlements. Any Green Belt allocations that cause coalescence are not just undesirable, but probably unsound. We should also avoid development that degrade narrow green gaps, even if it doesn't complete the linkage of settlements.

**1: Stock Green Gap**

The gap with the Chelmsford Borough boundary is less than 100 metres – we should preserve this green gap or else we will lose the ability to define the northern boundary of Billericay.

The gap with the village of Stock is further, around 1300 metres. This should be considered a very sensitive area of Green Belt due to the extensive ribbon development along the B1007 Stock Road in the Green Gap between the two. Recent planning permissions granted by Chelmsford have exacerbated this vulnerability.

**2: Havering's Grove Green Gap**

The gap between the two settlements is extremely narrow and would have been closed if the submission Local Plan had been found sound and adopted.

The gap could be as little as 75 metres (at Greenleas Farm), depending on how the edge of the Havering's Grove built-up area is defined.

**3: Little Burstead Green Gap**

This Green Gap separates Billericay from the village and conservation area of Little Burstead. At its narrowest point, on Frithwood lane, there are just 700 metres between the settlements.

This Green Gap also as the Laindon Road-Frithwood Lane Green Wedge (C above).

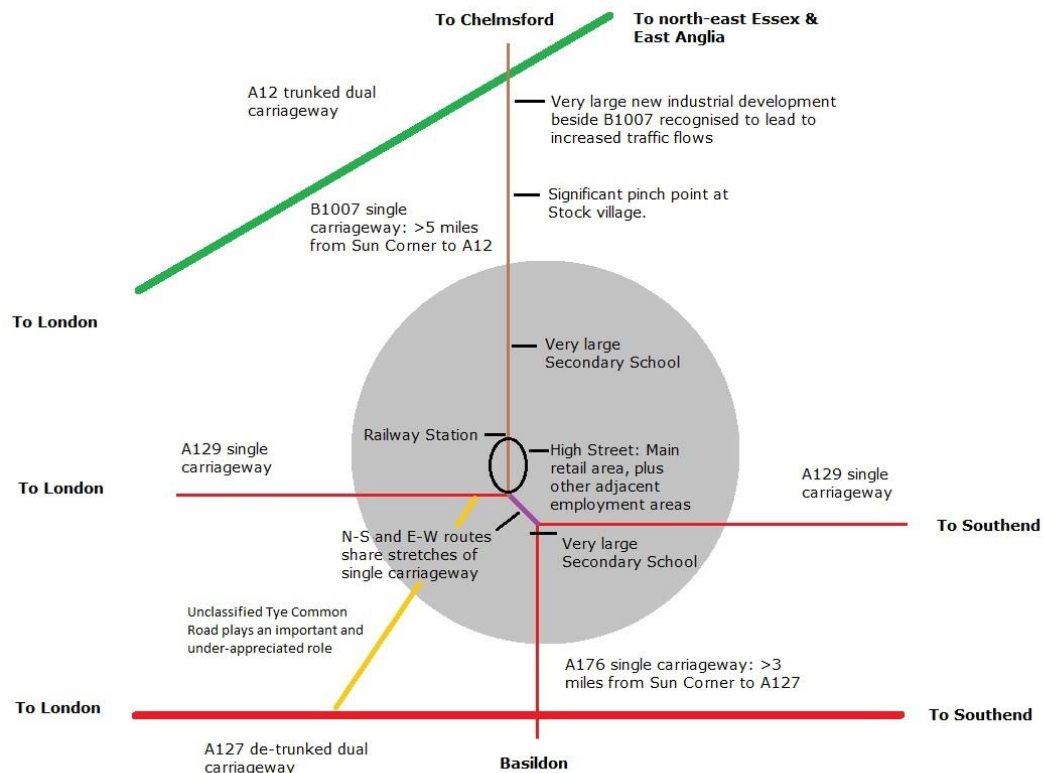


#### 4: Laindon Green Gap (Not shown on map)

This 240 metre Green Gap separates the Noak Hill area of Billericay from the Steeple View area of Laindon. The narrowest part of the Green Gap is occupied by a Dog Walking site.

#### 5.2. Local Road Network

The town's road network has not come close to keeping pace with the growth of the town; it is highly constrained, still being largely based on the mediaeval road network, and proving to be very sensitive to even relatively minor change, as seen when a relatively modest change to the management of the central roads was trialled in 2005.



**Figure 7 – Simplified schematic of the Billericay Road Network**

The town's road network has the following features:

- The town developed on the crossroads of the N-S A176\B1007 road from Basildon to Chelmsford and the E-W A129 from London to Southend.
- These routes share a carriageway for the 470 metres leading up to the congested Sun Corner junction.  
The congestion here has led to a search for mitigation; the SW Relief Road is single most important part of the Plan to grow Billericay, however we will argue that it is ill-conceived and counter-productive.
- Although the borough is laid out on a 7.5-mile-long E-W axis in a densely populated part of the country, **the B1007 is the only classified route heading out of the borough to the north**. The levels of traffic reflect this.
- The unclassified Tye Common Road heads out of town to the SW offering a through-route that avoids the High Street. Its importance has not been fully appreciated by Basildon and Essex planners.
- The railway is a major constraint to the road network, limiting route options and the design of some of these bridges (notably at Mountnessing

Road in the west) limits the flow of traffic that can safely use the available routes.

### **5.3. Access to London commuter routes**

Billericay residents driving to work in London principally rely on the A127 and to a much lesser extent the A12. The A13 and A129 (known as the A118 and A11 in London) are also used.

The A129 tends to be used for shorter E-W commutes, including as a route to the A12.

9% of the Billericay workforce commute by road to London, with many others commuting to other boroughs or within the borough.

#### **5.3.1. A127**

London-bound access is via three junctions, some miles from Billericay, near the edge of the town of Basildon.

- The A176 junction (Grade Separated) - Use of this junction would be hampered by growth in Billericay, and also Basildon, notably any growth at Noak Bridge and Steeple View.
- Fortune of War – it's not desirable to channel increased traffic down residential Laindon High Road North.
- The Dunton Wayletts junction (Grade Separated) - accessed by unclassified country roads including Tye Common Road. Use of this junction may be hampered by growth in Billericay, and also Basildon, notably the potential site at Steeple View (H9 in the old Local Plan) which was recently denied planning permission but which may, unfortunately, succeed at appeal.

#### **5.3.2. A12**

Two junctions are used, both some miles from Billericay:

- B1007 junction: Less than a mile of countryside separates the historic village of Stock (Chelmsford Borough) from the northern boundary of Billericay.  
Stock is a pinch-point for traffic and this will be worsened by growth in Basildon Borough, especially Billericay
- Many vehicles use the A129 and country lanes to access the A12 in the Brentwood area. These narrow lanes are prone to flooding, most notably Buttsbury Wash.  
Growth in Billericay, Brentwood and elsewhere will make the route more difficult to use.

### **5.4. Billericay Education Capacity**

#### **5.4.1. Secondary**

Billericay and Mayflower Schools are very popular and at capacity. Their very large size – Billericay is the largest school in Essex, Mayflower nearly as big – means it would not be conducive to good education to expand them further.

However, a very large proportion of children in both schools live in Basildon. So developments in Billericay could be accommodated by existing secondary schools, but it would mean places being 'repatriated' to Basildon, with extra school places needing to be created in Basildon.

Section 9.1 already sets out the very challenging education squeeze the new town faces in the coming years.

#### 5.4.2. Primary

Brightside school was recently expanded to 3 Form Entry and is now at capacity. This followed an investigation by Essex County Council which concluded that most or all other primaries were unsuited to expansion.

It may be therefore that new development in Billericay will require new schools to be built, though it is understood that Quilters school has long wanted to expand (it has the land), though there would be significant impact on the local road network.

#### **5.5. Looking Back – Formerly proposed road measures**

The last Local Plan recognised the particular limitations imposed by the Billericay road network and proposed a number of changes, most notably the Relief Road. Unfortunately, some of these changes, especially the Relief Road, were incredibly counter-productive.

Appendix C of this document outlines our view of these proposals, most of which should not be revived.

Our view is that only a full by-pass would effectively relieve traffic enough to allow significant growth, and the environmental (biodiversity, amenity, landscape) downsides of such a proposal makes it unacceptable.

#### **5.6. Other Points**

The Infrastructure Delivery Plan submitted with the withdrawn Local Plan identified Billericay as having the greatest constraints regarding sewage capacity.

## **6.Constraints: Sectors of Billericay**

The town is divided into north and south by the railway line, with very few bridges to link the two sides. We are following the approach of the last local plan in dividing Billericay into sectors – North, South-East and South-West.

### **6.1. Looking Back – Withdrawn LP Approach**

- The 2014 strategic options consultation took an approach that there would be development in SE Billericay, and possibly development in W Billericay, but only if a proper solution to growing traffic problems in the west could be found.
- In 2016, the first draft of the Local Plan included developments in SE Billericay.  
There was a proposal for north Billericay (Potash Road) and Essex Council had suggested a potential solution to the traffic problems – the counterproductive Relief Road – so the plan included allocations in the west (specifically the south-west).
- The 2018 Submission Plan included largely the same sites, but most had far more houses, often on far larger footprints.  
In some cases, this was done to pay for the counter-productive Relief Road.

### **6.2. Green Belt sites already approved**

At the current time, three Green Belt sites have been given approval in the Billericay Green Belt since the withdrawal of the Local Plan.

- Kennel Lane (200 houses)  
A SE Billericay site in the withdrawn Local Plan approved by a Planning Inspector at appeal.
- Maitland Lodge (47 houses)  
A SE Billericay site in the withdrawn Local Plan approved by a Planning Inspector at appeal.
- Coxes Farm Road Care Home  
A SE Billericay site approved by the Planning Committee.

Many\Most of the dwellings are likely to have been delivered by the time the Plan Period starts. These sites will need to be included in the first draft of the Local Plan.

In the unlikely event that any of these planning permissions expire, they will once again – in theory at least - enjoy full Green Belt protection. Our approach in that event is likely to be to seek to modify and improve the proposals rather than trying to have them withdrawn from the Local Plan.

### **6.3. North Billericay – North of the railway**

The urban edge of northern Billericay is a very long way from the railway station and high street services of central Billericay, making it an unsustainable location in that regard.

The presence of the Norsey Wood SSSI should be treated as a constraint to development in the north-east, and there should at the least be a large buffer between any development and Norsey Wood – and also the adjacent 40 Acre Plantation Ancient Woodland (Note: Despite the name, it's much larger than 40 acres and not a plantation)

The value of Goatsmoor Lane as an amenity for walkers, runners, cyclists and horse riders must be recognised and preserved. The value is partly due to their being little traffic on the Goatsmoor Lane (and linking roads) and that which there is generally travels slowly. Goatsmoor Lane is part of the National Cycle Network Route 13.

Development in the area risks undermining that resource, a problem that has been experienced with the modest development near the foot of Old Church Hill in Langdon Hills (the c50 property development was approved by Thurrock Council) which has reduced the pedestrian amenity value of Old Church Hill.

Development in most parts of north-eastern Billericay (east of Stock Road) risks accelerating run-off and worsening the flooding issues on Smallgains Lane (just over the border in Chelmsford Borough) – a stretch of which is flooded by the Stock Brook for much of the year.

#### **6.4. South Billericay – South of the railway**

The delineation between SW and SE Billericay is not clear cut.

For convenience, we use the A176, so that the Kennel Lane Site, approved by the Inspector at appeal, is part of the SE (with which it shares South Green School and South Green shops) though it shares road junctions and infrastructure with the SW.

##### **6.4.1. South-west Billericay**

###### **6.4.1.1. Traffic as a constraint**

As described, the various drafts of the Local Plan included developments in SW Billericay only because it was mistakenly argued that the "Relief Road" resolved the severe traffic issues in the area.

Given that the Relief Road is counter-productive rather than helpful (our reasoning is outlined in "Appendix C – Billericay Road Proposals in the Withdrawn Plan"), we contend that there should be no development in SW Billericay.

The only railway bridge linking south-west Billericay to northern Billericay – near the Gooseberry Green roundabout – is the poorest of the railway bridges in the town, despite carrying a lot of traffic; being hump-backed, with a blind summit, and having very narrow footways.

###### **6.4.1.2. Sports Clubs**

Any development should show great sensitivity to the existing cricket, tennis and football clubs. We understand that, prior to withdrawal of the Plan, that the current planning team did not intend (correctly in our view) to proceed with the submission Local Plan intent to move the sports clubs on the basis that moving a venue to a new site left a large and unnecessary carbon footprint.

The sports clubs were deeply concerned about the impact that residential development on their doorstep would have on their operations; any clash between the interests and priorities of the sports clubs and residential developers should be settled in favour of the sports clubs.

#### 6.4.1.3. Vital Areas

As described in 5.1, the Laindon Road-Frithwood Lane Green Wedge is one of the most important areas of Billericay's Green Belt.

Any development west of Tye Common Road-Mountnessing Road must be limited by the need to avoid coalescence with the village of Havering's Grove, while also leaving a buffer around the Mountnessing Brook and its tributaries in order that the rate of run-off on these slopes can be slowed by sufficient attenuation measures.

There are two Ancient Woodlands close to the urban edge of SW Billericay, Frith Wood and Shipman's Shaw.

Shipman's Shaw is almost certainly Ancient Woodland, but not, by default, included in the DEFRA MAGIC map due to its small size. An application has been made to add it to the DEFRA MAGIC map.

There should be large buffers (see 7.2.2) between any sites and these irreplaceable woodlands.

There are other Ancient Woodlands in the area, but further from the existing built-up area so less likely to be threatened.

#### 6.4.2. South-east Billericay

The first formal draft of the withdrawn plan, in 2016, included 640 homes in SE Billericay. The 2018 submission version included 810 homes. These totals would have placed great pressures on the area.

The sites approved by Planning Inspectors (200 at Kennel Lane and 47 at Maitland Lodge) must, unfortunately, be included in our new Plan.

##### 6.4.2.1. Traffic as a constraint

There are traffic challenges in SE Billericay, just as elsewhere, and it is hard to see why the arguments for constraining growth in SW Billericay were not applied to the South-East as the road network in the south-east still feeds into the central Billericay junctions.

The area's main route is the A129 Southend Road.

The often narrow side roads that link into the A129 Southend Road (Outwood Common Road, Outwood Farm Road, Coxes Farm Road and Greens Farm Lane) are for the most part unsuitable for development, and increased traffic there would impact on the usefulness of the key wildlife corridors and tend to isolate the wildlife focussed on Mill Meadows from the wider countryside.

The narrow, winding roads around Sunnymede School and Anisha Grange Care Home (within the existing built-up area) are dominated by parked cars and cannot cope with development which would see an increase in traffic.

The junction of Outwood Common Road and Southend Road experiences long tailbacks (up OCR) as evidenced by the BAG traffic survey of the junction. Unfortunately, there has been no Basildon\Essex surveys of the

junctions so any development in the OCR 'catchment' would require surveys and adequate mitigation – if it were possible to adequately mitigate.

#### 6.4.2.2. Vital Areas

The Mill Meadows SSSI is of paramount importance (see 5.1) and together with the nearby Norsey Wood SSSI (in N Billericay, but close to the railway boundary with SE Billericay) should be treated as constraints to growth in SE Billericay. The wildlife corridors leading to these sites are vital to their wellbeing.

Any direct or indirect harms, or risk of harms, to Mill Meadows must be scrupulously avoided.

#### 6.4.2.3. Great Burstead Flood Alleviation Scheme

The area around the Kennel Lane-Church Street junction is already subject to flooding, with homes flooded in 2012 and 2014. We are concerned that the Inspectors decision to allow housing at Kennel Lane will worsen the situation.

After the flooding Essex County Council worked on a proposal to build attenuation ponds on land west of Kennel Lane (near the Passingham Avenue junction) at a cost of around £1-2 million. As well as reducing flood risk, this would have had biodiversity benefits and potentially also provided a small public park.

Unfortunately, the landowner pulled out of the proposal due to disagreements over how much they should be paid.

We strongly believe that Basildon should work with Essex so that the scheme can be brought back, and included in the new Local Plan.

#### 6.4.2.4. Looking Back – A Case Study from SE Billericay

The proposal to develop homes on high ground on the main wildlife corridor linking Mill Meadows to the wider countryside makes a good case study of many of the problems associated with the withdrawn Local Plan, in particular the tendency of allocation policies to get worse over time, rather than better.

- Around 2012 the developer, Commercial Estates Group leafletted the surrounding area to publicise their proposals for 1-200 homes east of Mill Meadows.

The developer had put a lot of thought into the proposal. They accepted that, although the corridor wouldn't be narrowed, that development around the narrowest point would have an adverse impact on the wildlife corridor and therefore also on Mill Meadows itself.

Their argument was that the proposed development footprint and the retention of key wildlife features within that footprint minimised harm - while the conversion of the remaining part of the corridor into a nature reserve would offset that harm and deliver a net benefit to wildlife. Their argument was debateable, but credible. The idea was controversial, but some residents felt they could live with it.



- The site was not included in the 2014 Strategic Options consultation, instead a site between Outwood Common Road (OCR) and Outwood Farm Road (OFR) was chosen, however that site also had many problems associated with it.
- In the 2016 Draft Plan, the site between was OCR and OFR was dropped and the Greens Farm Lane site included. Unfortunately, the number of houses had increased from 1-200 to 280, and on a larger footprint. The nature reserve proposal was included and there were some safeguards for hedgerows within the area to be developed.
- The submission plan saw the 280 proposal increase to 400 by means which were in all likelihood unconstitutional.
  - In late 2017, the IG&D committee voted to include the site within the Plan with 280 houses, just as in 2016.
  - However when this came to full council shortly after (early 2018), this had increased to 400.
  - Councillors had more than 1700 pages to go through, and the justification for the increase was made out in a couple of demonstrably false sentences hidden away hidden away deep in the document.  
This increase became part of the Submission Draft.
  - Around 2019 the Berlesduna Academy Trust made an application to the Department for Education, set up a Free School at Greens Farm Lane – almost certainly on the land allocated in the Plan as part of the Nature reserve.  
The application was unsuccessful but the DfE encourages unsuccessful applicants to refine their proposals and try again.
  - In the winter of 2020/21, the Strategic Planning and Infrastructure Committee was asked by officers to make further adjustments. Constructive mitigation comments made at Regulation 19 by stakeholders such as BAG were ignored by planning officers, but requests made by developers were unnecessarily incorporated:
    - The first adverse change was that the nature reserve would become a recreational “strategic open space”. Severely reducing its ecological value and the mitigation it offered Mill Meadows. Other environmental protections for the area intended to be development were weakened.
    - The second was a general borough-level change to Policy GB3, so that that proposals for social infrastructure on Green Belt (such as schools) could more easily by-pass normal Green Belt protections.  
Our concern was this would open the door to damaging ad-hoc proposals such as that at Greens Farm Lane.  
We do view proposals for social infrastructure on Green Belt as generally better than those for housing, but this should be done as a carefully thought-out Local Plan strategy.  
It would have been far easier for the Berlesduna Trust to promote a school on a “strategic open space” rather than on a nature reserve.

These changes were accepted by the committee, but the Plan was thankfully withdrawn shortly after.

In conclusion, the case study illustrates how the Council allowed a sensitively designed proposal to be distorted almost beyond recognition by a lack of awareness of fundamental ecological principals and a prioritisation of developer requests above all other considerations.

Next time, any proposals for development on Green Belt, must get BETTER with each iteration, rather than worse.

## 7.GB Sites: Selection criteria

We don't want any of the borough's Green Belt to be used, but we recognise that the Council may choose to allocate one or more sites.

### General Comments on Basildon Borough's Green Belt

Only 63% of the borough is Green Belt, comparable to some London boroughs<sup>10</sup>:

- Bexley – 56%
- Richmond upon Thames – 54%
- Havering – 53%

We're not aware that any of these intend to develop Green Belt.

Furthermore, unlike many other authorities, a significant proportion of our Green Belt land is already covered by extensive low-density residential plotlands, solar farms and other non-rural land uses, including<sup>11</sup>:

- Residential land – 10% of our Green Belt, 6% of the Borough.
- Pitsea Tip and Solar Farms – 5% of the borough, 4% of our Green Belt.

On a landscape scale, much of our Green Belt is on the Langdon Hills ridge and South Essex marshes, which are unsuitable for housing growth for a variety of landscape, biodiversity and practical town-planning reasons.

That broad area - Basildon Green Belt south of the main branch of the C2C railway (including Pitsea Tip) - takes up around 23% the boroughs Green Belt - about 15% of the total borough area.

In considering selecting any Green Belt sites, it is important that the following are considered:

#### 7.1. Green Belt Purposes

The *Green Belt Review* document is intended to assess large parcels of land (usually larger than specific proposal sites) against the five purposes of the Green Belt. This is a valuable if sometimes subjective exercise.

The five purposes are:

- To check urban sprawl
- To prevent towns merging into one another – the merging of settlements. In 5.1 we have expressed concern about coalescence in the north, south, and in particular west of Billericay.
- To protect the countryside from encroachment.
- To preserve the setting and character of historic towns. As described in 5.1, Billericay is fortunate in having accessible Green Belt land reach the historic Billericay High Street conservation area, doing much to shape the town's character. These Green wedges must be protected.

<sup>10</sup> CPRE – figures include metropolitan Open land, a London specific equivalent to Green Belt. [CPRE-GiGL-Report-FINAL.pdf \(cprelondon.org.uk\)](#)

<sup>11</sup> Research by BAG, using Google Earth area measurement.

Other conservation areas such as Great Burstead and Little Burstead should be protected in the same way, and great sensitivity shown to heritage buildings, especially listed buildings.

In more general terms moderating growth in Billericay will protect its historic character from traffic, parking and a range of other issues.

- To assist urban regeneration, by encouraging use of brownfield land. House prices in London's Green Belt (London's inner commuter belt) are higher than most other places so developers are keen to build in this profitable region.

As the development of Green Belt land incurs lower costs than brownfield land, the protection of Green Belt land encourages developers to turn their attention to brownfield.

All Green Belt land serves this purpose.

## **7.2. Biodiversity**

There is now a requirement for planning applications to demonstrate a 10% increase in biodiversity. This is very difficult to achieve on Green Belt sites, but it can probably be done in some cases. The government policy is a good idea in theory, but it carries a great being abused by developers proposing very damaging developments which are justified by fudged biodiversity algorithms.

There is a serious risk of developer greenwash 'pulling the wool over our eyes', leading to bad planning and planning policy outcomes, they will always find a way to argue they will deliver a net gain.

For instance, the proposal for large executive "self-build" homes at Wood Valley Farm, adjacent to Norsey Wood (Allocation H21c in the withdrawn Plan, rejected by Basildon Council, and now rejected at Appeal) would have seen established trees, hedges and ponds destroyed and Norsey Wood further isolated from the wider countryside. Despite this the developers had the chutzpah to claim a 400% increase in biodiversity.

We have to make biodiversity a significant consideration long before the planning stage, instead most of the filtering of potential sites needs to be done as part of Planning Policy, when considering any Green Belt sites that might be used as Local Plan housing allocations.

To filter appropriately we need to consider the statutory designations, the habitat and species directly associated with the site, and also the sites context in the wider countryside.

The borough is fortunate to have a large number of ecological experts – many highly qualified - with excellent local knowledge; many of these attend the Basildon Wildlife and Countryside Forum that works in partnership with Basildon Council. We would expect great weight to be given to the ecological views of these volunteers.

### 7.2.1. Wildlife Corridors

The connectivity and interdependence of habitats is a simple but fundamental ecological concept, vital to understanding biodiversity.

A particularly valuable resource in regard to the wider context is the Nature Conservation Reference Guide for Basildon District Council, produced in 2005 Essex Ecology Services, which includes a map identifying key wildlife corridors.<sup>12</sup>

For instance, it considers, at an outline level, the connectivity of the wildlife rich, but partly isolated, Norsey Wood and Mill Meadows green wedges with each other, and with the wider countryside.

In December 2023, Basildon's *Biodiversity Action Plan*, triggered to align with its *Corporate Plan* recognised the great importance of wildlife corridors. The Local Plan must do likewise, meaning housing allocations will avoid these corridors.

### 7.2.2. Buffers around protected habitats

As well as protecting and enhancing these corridors, we should be looking at the related issue of 'buffers' around certain designated sites – notably SSSI and Ancient Woodland, in particular as part of key corridors referred to above.

The HELAA (Call for sites) methodology<sup>13</sup> identifies a number of buffers areas around infrastructure and wildlife sites. These were determined and agreed with a range of important national and regional stakeholders; they should be given considerable weight.

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<sup>12</sup> See map on final page - [Basildon District Council - Nature Conservation Guide for Basildon District - 2005.pdf](#)

<sup>13</sup> See page 11 - [Basildon Council - HELAA Review 2018 Volume 1 Main Report](#)

*Table 1: Buffer Zone Distances for Environmental Designations*

Environmental Designations	Buffer Zone Distance
Sites of Special Scientific Interest (SSSI)	2km
Special Areas of Conservation (SAC)	5km
Special Protection Area (SPA)	5km
Ramsar (wetland area)	5km
Local Nature Reserve (LNR)	100m
Ancient Woodland	100m
Local Wildlife Site	100m
Biodiversity Action Plan (BAP) Priority Habitat	100m
Potential Protected Species Area	10m

*Table 2: Buffer Zone Distances for Utilities*

Utilities	Buffer Zone Distance
Wastewater Treatment Works	400m
Major Hazard Area	150m
High Voltage Overhead Transmissions Lines (HVOTL)	30m-60m <sup>8</sup>
High pressure gas pipe lines	60m
Oil pipelines	6m

**Figure 8 - Basildon's policy on buffer zones around environmental designations and utilities.**

Some comments on some of these buffer recommendations follow below.

**7.2.2.1. SSSI buffers**

The HELAA discourages development within 2k of a SSSI site, this has not been given weight in the past, but ought to as it would help preserve biodiversity in these sites by protecting them from a range of pressures from pollution (air, noise etc) people and domestic pets.

In the case of the two Billericay SSSI (Norsey Wood and Mill Meadows) this is of particular importance as these are open to the public and have come under increased ecological pressure since covid from more public use, and a great increase in the number of people with dogs.

We strongly believe that this consideration should be used to moderate, if not preclude, development near SSSI.

Particular consideration should be given to the "Impact Risk Zones" around SSSIs that are shown on the DEFRA MAGIC map, especially in places where these zones intersect.

#### 7.2.2.2. Ancient Woodland buffers

The HELAA discourages development within 100 metres of an Ancient Woodland and we note that the latest planning reforms will give further protections to Ancient Woodland.

We do not believe that a hundred metre buffer is enough to protect biodiversity from the pressures such as air, noise and light pollution nor the damage caused by visits by people (especially with dogs). A particular challenge and reason to increase this buffer is the devastating kill rates of domestic cats.

There are only a few Ancient Woodland in the borough, mostly on the higher ground in the north of the borough and on the Langdon Hills ridge.

#### 7.2.3. Protecting Hedgerows

Hedgerows are an enormously important habitat, and such a vital element of habitat connectivity that any GB housing allocations should avoid densely hedged areas.

With the best will in the world, it is very hard to ensure that hedgerows within housing development areas are not destroyed. Even those that are carefully maintained are likely to suffer a loss of biodiversity as a result of disturbance associated by the proximity of a new estate.

Of course, any developments in less well hedged areas should have hedgerows and tree belts planted around them, and within them, to increase biodiversity and reduce the impact on the landscape.

New hedges can grow fairly quickly but it can take a very long time, sometimes centuries, for their biodiversity to match those of established hedges.

#### 7.2.4. Other biodiversity considerations

- Clearly damage to habitats (including the connectivity of habitats) of protected species (especially highly protected species such as Dormice and Great Crested Newts) must be considered when choosing and designing any Green Belt allocations.
- Similarly damage to other valuable habitats such as hedgerows and secondary woodland should also be avoided and buffers (15 metres to avoid root damage as a bare minimum) included.
- It is far better to avoid harm than to try to offset it onsite or elsewhere (as per the statutory mitigation hierarchy), but any offset sites should be within the borough or very close to its border. There is not nearly enough Council owned land to support much offset, therefore we think the best approach is to seek to create a network of offset sites on privately owned land. We suggest that a network is established around the key wildlife corridors we noted earlier in this section<sup>14</sup>.

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<sup>14</sup> See map on final page - [Basildon District Council - Nature Conservation Guide for Basildon District - 2005.pdf](#)



### **7.3. Landscape**

There shouldn't be development on sites that are valuable in terms of landscape and viewpoints. The old plan had Landscape Appraisals which helped identify these areas.

There were also Outline Landscape Appraisals which looked at specific sites identified in the 2016 Local Plan draft.

### **7.4. Accessibility and Amenity**

Typically, this will refer to public rights of way. Any Green Belt allocations should be carefully selected to avoid public rights of way, and if sites with PRow are chosen, the routes should become a focus of generous open spaces focused upon them.

We should be looking at best practice and opportunities for improving the accessibility of the countryside, not reducing it through development.

BAG, and probably many other individuals and groups, have a number of suggestions for places where a short new PRow or permissive footpath could significantly boost the connectivity of the footpath network, and with-it public amenity.

An example of this is that east-west connectivity of the PRow network in the Crouch valley between Basildon, Billericay and Wickford are very limited, significantly reducing the number of route options available to recreational users.

### **7.5. New designations**

There are a number of open spaces in the borough that should be (ideally together with their immediate surroundings) better protected by receiving protective designations. A few examples follow.

#### **7.5.1. Local Greenspace**

The withdrawn Local Plan sought to designate a large area of small urban (ie non Green Belt) green areas as "Local Greenspace", giving increased protection to them. We would like to see this included in the new Plan.

#### **7.5.2. Designating new LoWS**

We believe the Council should designate a number of new Local Wildlife Sites. This is particularly justified as three LoWS have been badly damaged or destroyed in recent years due to a housing development, an illegal tip and a solar power station.

For the Billericay area, BAG would start by suggesting:

- Shipman's Shaw, a small ancient woodland at Havering's Grove. It's not already designated as its too small to appear on the DEFRA MAGIC map as Ancient Woodland (though it is included on the DEFRA map as unspecified BAP woodland)
- Wiggins Lane Wood, a secondary woodland at Little Burstead.
- Secondary Woodland at Hannakins Farm
- Grimshill Wood, a secondary woodland in a prominent position at South Green.

- Secondary woodland by the PRoW and brook, between Outwood Common Road and Outwood Farm Road.

Essex Ecology previously suggested the first three of these be considered for inclusion (along with other in Billericay and Langdon Hills) back in 2009, but this was never taken forward.<sup>15</sup>

Other groups and individuals will be able to recommend a number of other sites around the borough.

### **7.6. Other Practical Considerations**

There are many practical town planning considerations to consider, a non-exhaustive list follows:

- Sites should ideally be under single ownership, with availability clearly demonstrated. This was a shortcoming of the withdrawn plan, for instance site H17 (SW Billericay) was held by fifteen or more landowners (not the widely understood four), not all of whom had made their plots available.
- We understand that it's a general principal that development should not accelerate the rate of rainwater run-off from a site. This is harder to address on sloping sites and care must be taken that site allocation policy details do not design out the possibility of holding back run-off, for instance by retaining too little open space. The climate change pattern of "drought then deluge" makes this particularly important.
- We should avoid adding an extra load to road junctions that are at, or approaching capacity – though in some cases there may be mitigations that improve capacity without causing undue harms.
- Any Green Belt development should be within 10-15 minutes' walk of significant services (either new or added as part of the development). This is vital in limiting car use, as in the "15-minute City" concept.<sup>16</sup>
- Any Green Belt development should have regular, frequent public transport services.
- The Essex Design Guide provides a yardstick for distances from services, schools, and bus stops<sup>17</sup>.

### **7.7. Squaring the circle**

As described in 8.2.2 we believe any Green Belt allocations should include at least 50% open space. This helps mitigate or resolve some of the issues raised in this section, including the preservation and enhancement of wildlife corridors.

It will also allow sufficient land for attenuation ponds to help slow rainwater run-off. These ponds are good for wildlife and help create a pleasant environment for residents to enjoy.

A note of caution is required though, some sloping sites have such challenging run-off issues that they would require very large water holding areas – or raised water holding areas, which would dominate and diminish the open spaces. Such sites should be not be chosen.

<sup>15</sup> See Appendix 2 [Basildon District Biodiversity and Habitat Service Level Agreement Report 2009 \(basildongag2011.org.uk\)](http://basildongag2011.org.uk)

<sup>16</sup> Guidance from the Town and Country Planning Association [20MN\\_Main.qxd \(tcpa.org.uk\)](http://20MN_Main.qxd)

<sup>17</sup> Essex Design Guide - [Criteria for All Development Sites | Essex Design Guide](#)

## 8. Designing GB Sites

In 2019 BDRA produced the 'Four Firsts Charter', outlining our four priority considerations when building Houses:

- Infrastructure First – adequate, appropriate infrastructure must be in place before development starts. This includes but is not limited to; schools, health facilities, shops, roads, public transport and parking.
- Local First – new development must prioritise local needs and fully integrate with the existing local community.
- Affordable First- all development must deliver the full affordable house quota first, followed by smaller houses for local first-time buyers, young families and those residents wanting to downsize.
- Environment First – the Green Belt and existing public green spaces must be protected, hedgerows and trees should be maintained where new development takes place, air quality should be a primary concern in any development, and new public green places should be created within developments where they do not exist today.

These guiding principles continue to shape our approach.

### 8.1. Right Type

#### 8.1.1. Social Housing

We strongly support Council efforts to include genuinely affordable social housing (especially Council Housing) in the Local Plan. Unfortunately, we recognise the Councils limited ability to deliver many of these homes.

#### 8.1.2. Affordable Housing

Unfortunately, the term 'Affordable Housing' as defined by central government is a misnomer. It is not reduced (or even affordable) priced housing available to buy on the open market.

It is very specifically houses provided at a reduced rent (typically at 80% of market rates), or for shared ownership (partial purchase). These properties are provided through a registered housing provider so they come with conditions on qualification and on tenure, but they are usually prioritised for local people and key workers.

This wholly inadequate definition of affordable means that in an expensive area like Billericay the discounted dwellings will be significantly more expensive than market homes elsewhere in the borough.

None the less, these houses are useful so we support the Council delivering as high a proportion of 'Affordable' houses as possible, ideally more than the 31% in the withdrawn local Plan.

We note that Brentwood's adopted Local Plan includes a requirement for 35% 'Affordable' houses and suggest this is a realistic target.

#### 8.1.3. Dwelling Size

Policy H25 of the withdrawn draft Plan included an element relating to dwelling size. We would strongly support this policy being included in the new Local Plan. These smaller houses accord more closely with local need and tend to be less expensive.

2. All sites delivering 10 or more homes should comprise a housing mix of 40% one and two bedroom homes, 40% three bedroom homes, and 20% four or more bedroom homes. Consideration will be given to schemes proposing a different housing mix where they relate to urban regeneration schemes to ensure the most effective use of urban land is attained.

There is a case that there should be separate requirements for 1 and 2 bed properties rather than the combined total in the withdrawn Plan.

The withdrawn Local Plan evidence base suggested that 14% one bed houses and 26% 2 bed houses - so that would be an evidence based way of splitting out the two elements.

## **8.2. Designing Estates**

### **8.2.1. Current Open Space Standard**

Basildon has an open space standard of 5.7 hectares of open space per 1,000 people in the population.

The Infrastructure Delivery Plan supporting the Submission Local Plan identified that Billericay does not currently meet that standard (ie before any further development adds to the population and corresponding open space requirement), having a shortfall of around 12 hectares (25 acres).<sup>18</sup>

It's tricky to apply this standard to new developments, depending as it does on a variety of factors such as average household size (on new developments) and the net density.

Assuming 2.4 people per home and a net density of 35, this suggests a requirement of around 38% open space within any development.

In our view this requirement is ambiguous and inadequate. A fixed minimum percentage requirement should be introduced.

### **8.2.2. Generous Open Space**

We recommended the Essex Design Guide Garden Community standard of at least 50% of a site being given over to green and blue infrastructure.<sup>19</sup> The threshold for a Garden Community is 1500 homes, but there is no reason why the 50% open space requirement can't be applied to smaller sites.

This would help make up our open space shortfall, preserve and promote wildlife and accessibility corridors, fight flooding and potentially increase biodiversity.

But if we're to have 50%+ open space, how should it be laid out?

Highly sensitive sites like woodlands and other rural areas recognised by specific designations should be protected by significant buffers, and their value enhanced through appropriate management, and in some cases by changes of ownership, or by extending the habitat.

Within sites, we would like to see Public Rights of Way, trees and hedges,

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<sup>18</sup> [basildon.gov.uk/media/8655/Basildon-Council-Infrastructure-Delivery-Plan-Oct-2018/pdf/Basildon\\_Council\\_-\\_Infrastructure\\_Delivery\\_Plan\\_-\\_Oct\\_2018.pdf?m=636765996835230000](https://www.basildon.gov.uk/media/8655/Basildon-Council-Infrastructure-Delivery-Plan-Oct-2018/pdf/Basildon_Council_-_Infrastructure_Delivery_Plan_-_Oct_2018.pdf?m=636765996835230000) pages 33-26

<sup>19</sup> Essex Design Guide on Garden Communities - [Garden Communities | Essex Design Guide](#)

ponds and watercourses used as the basis of a generous 'Green Grid' of open spaces within the site. Play areas, parkland, sports pitches, allotments, flood attenuation ponds and nature promotion/protection areas would be built around that Green Grid framework.

Where possible we should also seek agreements for new rights of way from new developments into the wider rural Public Right of Way Network.

Broad public open-spaces around both banks of watercourses provides more than a pleasant open space, they provide opportunities for a number of measures that can be used to prevent flooding (on-site, in neighbouring properties and downstream) that are also fantastic at promoting bio-diversity:

- Tree planting
- Re-channelling brooks to provide a longer more sinuous course.
- Provision of attenuation ponds to slow run-off and provide habitat.

It's important to have significant open space within sites, but there can be value in also providing a block of land on the new urban-rural boundary, or even on a site a short distance away - it all depends on the specific qualities, constraints and opportunities that apply to the site being developed.

Such an approach provides existing local residents with meaningful compensation for the downsides of living in a more developed environment.

### 8.2.3. Net Density

Net Density refers to the number of homes per hectare on the developed part of any housing development – disregarding open spaces within the development.

A higher density is appropriate in town centre locations which are close to jobs and services and therefore less car dependent. Less sustainable edge of town (Green Belt) locations are much more car dependent and cannot sustain high densities – making them wasteful in terms of space when compared to brownfield locations.

When building on Greenfield sites developers prefer to build large detached 'executive' homes at a very low density – 20dph or less. While a lower density is appropriate on edge of town locations, this wastes precious space and is in our view not dense enough.

In the 2016 draft Plan, most sites had a net density of 30, while in the submission draft this had increased to 35 for most sites.

Using the Noak Bridge estate as a benchmark, 30 (35 at the most) seems about right. It is acknowledged that this is denser than much or most of Billericay, and in some cases this may present problems.

#### **Noak Bridge Case Study**

The first, western, parts of Noak Bridge were built in the early 1980s as a Council Estate.

The estate provided a generous parking provision for the time and, partly by delivering many 1 and 2 bed homes, partly by dispensing with front gardens, achieved a net density of 40+ homes per hectare.

The estate has many qualities – as well as a few flaws – and has been designated a Conservation area for its high architectural standard.

However, in hindsight, this was too dense. Not enough parking was provided to accommodate the number and size of cars people have nowadays. The streets and pavements are dominated to an unpleasant and sometimes dangerous extent by parked cars.

Few houses have scope for extension and there was no room for street trees; there are very few in the older parts of Noak Bridge.

For this reason, we think a net density of 30, or thereabouts, to be more appropriate.

#### 8.2.4. Other Points

- There should be an indicative layout made available at the R18 consultation stage to help residents understand the proposals and engage in the most productive way, so the proposal can be improved (perhaps reducing the allocation, or making qualitative improvements) or in some cases taking it out of the Plan.
- The developed parts of an allocation can be designed with nature in mind – we would like to see significant number of street trees – many of them large, many of them native trees which tend to be more valuable for wildlife.  
The homes and gardens themselves can be developed according to provide opportunities for wildlife, swift bricks, bat boxes, hedgehog-accessible gardens and so on. There should be Plan Policies requiring this, and proper enforcement to ensure it is actually delivered.
- There must be adequate parking within the developed part of the site. Housing developments on Green Belt sites are inevitably car-dependent and this cannot be wished away with hopes of people shifting to bikes and buses.
- That being said we must still try to facilitate cycling and do all within our limited powers to improve bus services.

## 9. Social Infrastructure

### 9.1. Immediate Education Problem

The council might be able to moderate growth in Basildon Town Centre (or gain other improvements such as housing classified as affordable), but we are still committed to large scale development in an area that, from an education perspective, cannot accommodate it.

There is a simple formula used by Essex and other LAs to identify the need for school places and that is that 700 dwellings leads to a requirement for one 30 child class per year group – one form entry, to use the technical term.

For this reason there is a planning principal that development in a borough should be thought of in terms of multiples of less than 700.

**Note:** By planning in multiple of 5-600 rather than 700 we allow for inevitable “background growth” that occurs over time, for instance as result of ad-hoc planning applications.

So, 4800 homes, roughly what we might expect to see in Basildon Town Centre, would create a need for seven forms of entry. In practical terms (excluding early years and further education), this means we will in a very short period of time have a requirement for the following:

- One 7FE secondary school, with 1050 children in years 7-11.
- Three primary schools, 2x2FE primaries (420 children in Reception to Year Six) and 1x3FE primary (630 children)

**Note:** Essex only build 2FE or 3FE primaries.

Of course, it’s not quite as simple as that, on one hand some existing schools are likely to be able to take some of that though expansion, but on the other hand there will be plenty of other brownfield development, and perhaps Green Belt development too, which will increase demand for places.

Although there is flexibility in that catchment areas can be adjusted, there will still be a requirement for a great deal of new education provision close to Basildon Town Centre. One reason for this is that primary children living further than two miles from school, and secondary children living more than three miles from school, are entitled to Home-to-School transport at the expense of Essex County Council.

It doesn’t matter if many of these are built before the Plan Period starts, we need to be able to provide schools for these children to be educated in. This challenge must be an immediate priority of the new Local Plan, and is likely to be challenging. We should avoid adding to the problem with more development than is necessary.

See also: Education issues in Billericay (section 5.4)

### 9.2. Health

Meeting OAN over the 15 year Plan Period would see the Basildon population rise by 37,000 (about 20%) – a much faster rate of growth than we have experienced in recent years.



With the rest of south and mid-Essex also experiencing rapid growth it seems plain that much expanding hospital and other health capacity will be needed – even with a more moderate rate of growth.

## 10. Economy

Great caution is required with regards to housing growth, as it is far easier to attract and retain new residents than it is to attract and retain new jobs.

It is probably common ground that the economy exists to serve the people of the borough, not the other way round.

### 10.1. Broad Economic Strategy

About half of the Basildon workforce (excluding those who are currently economically inactive) work in the borough, and half work outside. (Similarly of those who work in the borough, half commute in from elsewhere).

There is a limit to what a Local Plan can achieve, but our economic policy should be built around increasing the proportion of the Basildon people of working age who work, and who work within the borough – especially where these people are in secure jobs on decent pay.

A secondary aim should be to limit the inevitable increase in the absolute number (rather than proportion) who commute out, to London and elsewhere.

Out-commuting is less sustainable, and something which should be avoided.

### 10.2. Mismatch between housing types and local jobs

Basildon workers holding jobs in the local area are paid significantly less than those who commute out, especially those who commute to London.

The homes delivered over the Plan Period will overwhelmingly be market houses, and these (especially those delivered in the most expensive areas, such as Billericay) will not typically be affordable to local people, especially local people working locally.

They will therefore attract people from outside (typically London, where house prices and wages are higher) who will then commute out.

Higher levels of growth therefore lead to increased out-commuting.

### 10.3. Importance of London commuters

As described, half of the Basildon workforce (excluding the unemployed and economically inactive) commute out of the borough. The borough is economically reliant on those out-commuters, especially those working in London who earn higher wages.

**Table X - Proportion of local workforce who commute to London**

	Billericay	Rest of Basildon	Castle Point	Rochford	Southend	Thurrock
<b>Train</b>	23%	11%	10%	12%	12%	13%
<b>Road</b>	9%	9%	8%	6%	4%	19%

It's important to understand this reliance if we are to understand our dependence on the radial commuter links to London; the A127, the C2C line and the Southend Victoria Branch Line.

We need to protect these from overload by moderating growth and attracting funding for meaningful improvements.

#### **10.4. Avoiding reliance on economic projections**

The evidence base will include economic projections, and while we should be mindful of these, we must treat them with great caution.

It is not possible to accurately assess growth or decline of the local\national economy in the recent past, so guesstimates of the size, shape and value of our economy in 2042 are of limited value.

In the past we have used economic projections as a justification for large scale housing growth, the idea being that bringing lots of people to the borough would bring lots of jobs.

There is an element of truth in the approach, in that more people means more goods and services would be in circulation – but how many extra jobs would this create in Basildon?

Some surely, but the large majority of goods and services supplied to the incomers will be provided nationally and internationally, as they are now. It would seem dangerously optimistic to assume that a 20% increase in population would see a 20% increase in employment achieved and sustained.

There's another side to this too – an increase in the workforce is good for business in that it alters the balance of power between business and the workforce, shifting the balance of power towards employers, for instance reducing pressure on them to increase wages.

There was outrage recently (September 2023) at the comments of multi-millionaire property developer Tim Gurner who openly wished for an increase in unemployment so that workers would be more compliant.<sup>20</sup> The comments were crass, but unfortunately this is a mainstream view in boardrooms across the world.

We don't want a low wage economy in Basildon, and while we should support business, we need to do it in a way which is a win-win for business and society as a whole.

#### **10.5. Looking back – our latent labour force**

It is deeply frustrating to read in the Integrated Impacts Assessment prepared by consultants LUC (section 6.101) that not meeting OAN would have an adverse impact on employment opportunities.

This opinion does not seem to be evidenced, but is presumably based on the same line of reasoning used in the withdrawn Local plan – so it is therefore necessary to revisit the rationale used there.

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<sup>20</sup> [Multimillionaire Tim Gurner regrets 'deeply insensitive' comments calling for 'pain in the economy' | Australia cost of living crisis | The Guardian](#)

In the withdrawn Local Plan, the consultants we relied on (Turley), contrived an economic algorithm that assumed that all proportions (unemployment, proportion of people who are economically inactive, part-time workers, out-commuters) would remain the same – see no improvement – across the twenty-year plan Period.

This meant that the current latent labour force (the unemployed, economically inactive etc) were not considered available to fill the algorithm estimate of how many jobs might be created. That jobs estimate was in itself fuelled by an assumption that in-migration would be accelerated by large scale housebuilding creating a greater market for goods and services.

So due to these circular logic and socially unjust assumptions, accelerated out-migration from London was considered necessary to fill the jobs that might come.

The outside workers and their families must come and homes must be built to accommodate them.

As described, this almost entirely ignored Basildon's very large 'Latent Labour Force'.

Basildon's Latent Labour Force, (at that time) comprised:

- 6,000 unemployed
- 18,000 part-time workers (many of whom would like to work longer hours)
- 30,000 economically inactive (many of whom would like to work full or part-time)
- 50,000 people who commute out of the borough to work (many of whom would prefer to work closer to home)

As the proportions of these categories are assumed to remain constant across the Plan Period, the people that comprise these figures were not taken into account when calculating who is available to fill the jobs which may or may not come.

As the latent labour force is largely excluded – including local residents working outside the borough – and local people already working in local jobs (understandably, except for part-time workers) weren't considered available; just who was considered available to fill the new jobs that might come?

If the only people brought in were people coming to fill the jobs that might come (local people being considered unavailable) then the proportions of each type of person in the formula would change – ie would be different at the start and end of the old Plan Period.

So to ensure all other proportions in the formula remained the same, every new worker (and family) brought in and housed was to be joined by an out-commuter (and family). Additional unemployed and economically inactive people were also to be brought in as well.

This approach, which is seems to be being broadly continued by our new consultants LUC, is not demographics, not sensible economics and certainly not humane.

#### **10.6. New Industrial Estates**

Although we should try to attract jobs to the borough (as long as it improves the ratio of local jobs to local people) we are doubtful of the value of designating new Industrial Estates.

New estates are not guaranteed to attract and retain occupants, and if they do many are likely to be large automated sheds which employ few workers. It seems better not to designate in the new Local Plan, but to instead to reconsider at the 5-year Review stage.

The development of our existing industrial estates involved clearing nearly all trees and hedges. Working in these estates can be dispiriting due to the poor environment. As well as the effects on people's wellbeing, it also makes it harder for companies to hold onto employees.

If we do assign new industrial estates we should:

- Ensure a pleasant environment by including open areas (mini-parks) and retaining some existing landscape features.
- Ensuring a regular, frequent bus service.
- Ensuring walkable access to services such as shops and cafes.

#### **10.7. Other points**

- Thurrock will benefit from freeport status, but there is no reason to think it will attract employers to Basildon. The reverse may be true.
- Existing and potential businesses require a reliable road network. Our local businesses have complained about congestion on local roads in the past, and the situation will be worsened by even moderated local population growth, due to its corresponding growth in commuter transport. More homes can be bad for business.

# 11. Tackling Climate Change

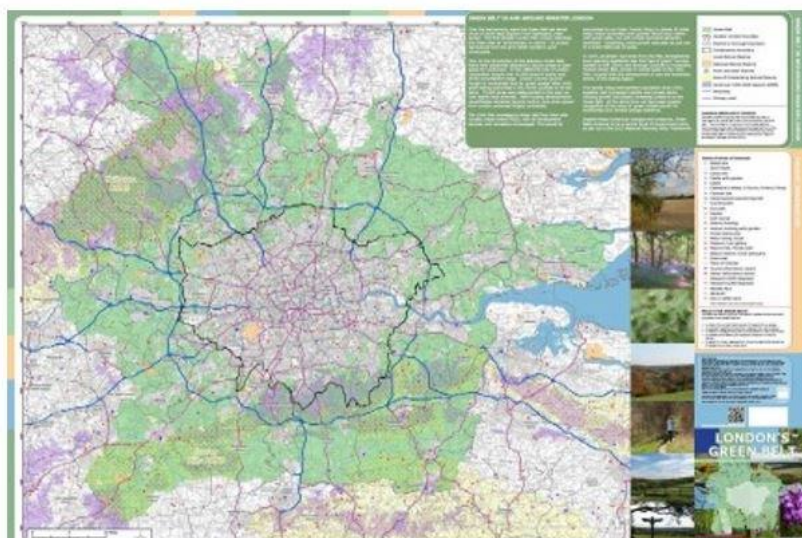
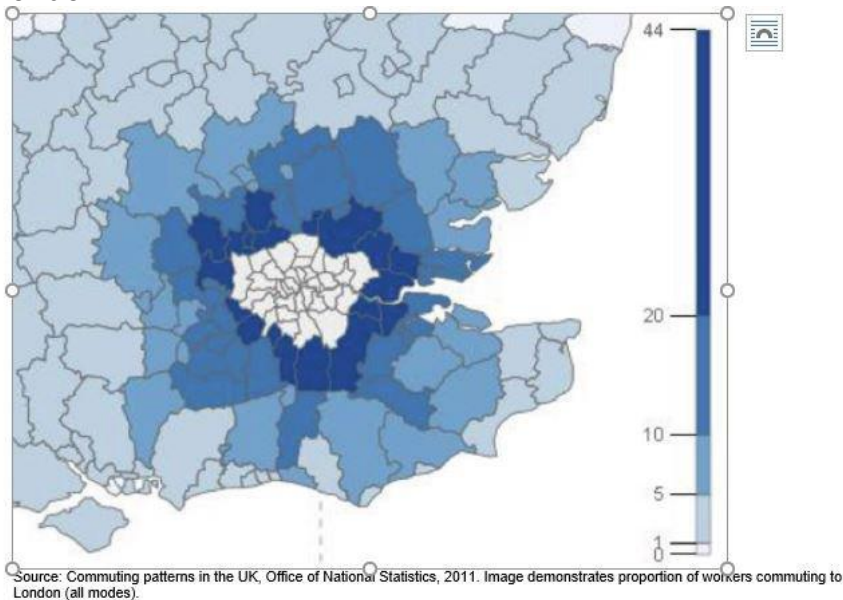
There is a limit to what a Local Plan can achieve, though we have outlined some ideas; our main points are to make sure we avoid mistakes which unnecessarily worsen the borough's carbon footprint.

## 11.1. Moderating housing growth is more sustainable

The most sustainable places to live are towards the centre of towns, and especially cities; close to jobs and services, and where there are plentiful public transport options.

Such areas can sustain higher density development and people don't typically need to own or use cars to a great degree.

Meeting or approaching OAN, especially where it means developing Green Belt land on the edge of towns, would lead to more people moving from those more sustainable external places, to our less sustainable borough (be that in more sustainable town centre locations or less sustainable edge of town locations). Having moved out they would usually still commute back into London.



**Figure 9 - Correlation between London inner commuter area and its Green Belt**

Although our commuter trains are electric, much of the electricity used to power them is produced by gas.

Housebuilding has a huge carbon footprint. Moderating this will moderate Basildon's carbon footprint during both the construction and operational phases.<sup>21</sup>

**11.2. Solar power**

Solar Farms on the countryside make a modest contribution to UK energy supply, but the harms (harm to green Belt, food security etc) outweigh the benefits.

Although there is a limit to what a Local Plan can achieve, we support policies with an ambition to increase the proportion of homes, businesses, car parks and other urban locations which have solar panels. There are such extensive and untapped urban solar opportunities, that the use of countryside to produce solar energy is unnecessary.

**11.3. Energy Efficiency in homes**

If the Local Plan can require higher standards (eg BREEAM, Passivehaus standard) of energy efficiency in new homes than that required by legislation, then we would be supportive of that.

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<sup>21</sup> [The need for embodied carbon regulation — Part Z \(part-z.uk\)](#)

## 12. Comments on the IIA

We found a number of very disturbing opinions and omissions in the Integrated Impact Assessment (IIA)

### 12.1. Settlement Hierarchy – Havering’s Grove

The continued exclusion of the cross-boundary village of Havering’s Grove from the settlement hierarchy (Figure 4.5) is of great concern. This omission probably has its roots in the Basildon Settlement Hierarchy Topic Paper of 2012, which omitted the settlement<sup>22</sup>.

The omission is understandable as most of the village is in Brentwood Borough. A continued exclusion of the settlement would undermine the soundness of the Green Belt Review, and any decisions based on it.

### 12.2. Impact of lower growth on house prices and job prospects

We strongly disagree with the opinion expressed in Section 6.101, that lower rates of housing delivery will adversely impact houses prices (our counterargument is expressed in 2 and 3) and reduce job opportunities (our counterargument is expressed in 10)

### 12.3. Targeting hedged and wooded areas

Section 4.186 suggests that the more wooded and better hedged areas of the borough (this correlates to high ground for geological and agricultural reasons) – such as Billericay and the Langdon Hills ridge are well suited for development as the trees can screen development.

It is true that trees can mitigate the impact of developments on the landscape, but the IIA statement is none the less astonishingly wrongheaded:

- Firstly the well hedged and wooded areas tend to be on higher *more visually prominent* ground (especially on the Langdon Hills ridge).
- Hedges (see 7.2.3) and woods are some of the most vital areas for biodiversity, especially with regard to the connectivity of habitats. Even where these key features are retained, there will be an adverse impact on biodiversity.

This creates an unnecessary conflict between biodiversity (hedges and woods) and landscape requirements.

If there was a requirement to use Green Belt in the Local Plan (of course there is not, though there is strong pressure to do so) then planning\planning policy regulations prioritises biodiversity over landscape.

Landscape is also very important, but trees and hedges can be planted in and around new developments and can mature fairly quickly (especially if planted at the start – or even before – the building period, which may take many years, begins). Biodiversity takes far, far longer to establish, sometimes many centuries.

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<sup>22</sup> Basildon Council - Core Strategy Preferred Options - Topic Paper 8: Settlement Hierarchy - February 2012



- The last Local Plan saw well hedged areas around Billericay, Wickford and Basildon allocated for development. This would have seen a huge decrease in biodiversity around those sites.

Each town also had a number of more open areas allocated for development. We need to take a different approach in our new Local Plan.

## 13. Some general challenges

- Last time developers extracted more and more concessions from the council over time, for instance increasing the footprint\number of houses over time and weakening environmental protections between drafts (the case study regarding Greens Farm Lane, see 6.4.2.4 is a good example). This time our plan policies should improve with each iteration.

We are very concerned that the council and developers will see the withdrawn Plan housing 'yield' (numbers of houses per site) as the starting point – rather than considering potential yields from first principals in an evidence-based manner.

- There is an understandable tendency to defer to Essex County Council, in their role as the Highways Authority. But we are the Local Planning Authority and have overall responsibility.

Essex CC have made many egregious errors with major changes to the way local roads operate (for instance the recently reversed fiasco around changing the approaches to the Noak Bridge roundabouts).

We need to be confident enough to disagree with their input – and we should not take a lack of an objection from them as evidence that there are no valid objections to a road\traffic element of a proposal.

## 14. Appendix A – South Essex Rail Network

**Note:** *This research was largely written prior to the Covid epidemic, the long-term effects on demand are unclear and probably complex, the details on key characteristics of the service, and potential supply improvements remain unchanged. f which are unclear. The full study document can be downloaded via the following link: [Rail Topic Paper - BILLERICAY ACTION GROUP](#)*

One of the original reasons for establishing the Green Belt around London was to prevent the capital's commuter infrastructure from being overwhelmed by population growth at and around the city's periphery.

SE Essex is a commuter economy within London's Green Belt, 12% of workers commute by train to London (23% in Billericay) with a further 10% travelling by road. These London jobs are of disproportionate economic importance, being more highly paid than those held by counterparts working locally.

However, the area's large Objectively Assessed Needs (OAN) of 89,000 houses over 20 years, would, if met, see a sharp rise in both population and the number of people commuting to London

This begs the question about whether meeting OAN is economically sustainable. Will the commuter infrastructure - already at capacity, on which the area's economy depends, be able to respond to the increase in demand?

Billericay Action Group (BAG) made the decision to produce this study to examine that question and we are indebted to the local rail franchises for their assistance in producing it.

**14.1.** OAN accelerates growth and in-migration and London commuting rates  
The Standard Method for calculating OAN doesn't just deliver many more houses than local people need, in most parts of south Essex it would also accelerate in-migration.

Furthermore, the proportion of incomers who commute is likely to actually be greater than the current local proportions as the large majority of new homes will be at market prices, the price of which is determined by what the out-migrating Londoners, who still intend to work in London, can afford.

### **14.2.** C2C

Demand on the line grew 45% in 2006-16, and Peak Demand can be expected to grow 36% in 2013-23 and 76% in 2013-43. The operators cannot run more frequent services but can make some improvements to capacity through lengthening services and have begun to do so.

- The busiest section of the railway is the direct section via Basildon and High Peak capacity on that section could grow up to 18% from the baseline, and much of this improvement has been delivered already.
- The limited, slow service via the Tilbury loop could see a 71% increase in High Peak capacity if issues around Level crossings are resolved.
- The capacity of the Grays to Fenchurch Street route, via Chafford Hundred, cannot be improved.

Most of these improvements will be delivered by 2025 and after that there is nothing meaningful that can be done to improve capacity.

### **14.3. Southend Victoria Branch**

Peak Demand is projected to grow 32% in 2013-23 and 75% in 2013-43. Crossrail makes no difference to rail capacity in South Essex, and it is not practical to extend the line as sometimes suggested.

#### **14.3.1. Capacity Improvements in the current franchise – to 2025**

There are grounds for guarded optimism that High Peak capacity could increase by up to 20% during the current franchise.

- It is possible that High Peak capacity in part of the branch could see a 4% increase from lengthening the last High Peak service that is not at full 12-car length. It is also possible that there could be a small reduction.
- The train fleet replacement will mean more seats fitted into trains of the same length. Approximately 5% will be standard seats, and another 15% will be tip-up seats in standing areas. These won't be usable at the busiest times.

#### **14.3.2. Potential improvements in the next franchise – 2025 to 2035**

There is also a chance that two additional services per hour may be available in the High Peak. If these services do not become available in 2025-35 they are still likely to do so in the long run, **however** when they do it is doubtful that the Southend branch will be the beneficiary.

There are no other meaningful improvements to High Peak capacity that could be applied in this period.

### **14.4. Impact of Covid**

At the current time (Sep 2023) it is still too early to assess the net impact of the Covid Pandemic, but it's clear that it cuts both ways. On one hand the reduction in demand is likely to buy time for the railways by accelerating existing trends to home-working.

However, a further effect has been to seriously damage government and railway industry finances, threatening the delivery of improvements. A major concern for both corridors is that the operators will address their financial deficits by prioritising London stations, and in the case of the Anglia line by prioritising services on the main branch to Norwich.

### **14.5. Railway Tipping Point**

Both railways face enormous challenges, even if OAN is not met. The greatest threat to each railway is the problems of the other. When one line becomes intolerable, passengers will increasingly transfer to the other line threatening to overwhelm that in turn.

### **14.6. Recommendation**

Meeting OAN is often presented as a way of boosting local industries by providing a large pool of labour. However, doing so would hazard the much more valuable *existing* London employment we already depend on by overloading the railways.

A bird in the hand is worth two in the bush but meeting OAN would be akin to risking two birds in the hand to chase one in the bush.

Most Local Authorities are expected to meet OAN, however there are exceptions:

"The Framework is clear local planning authorities should, through their Local Plans, meet objectively assessed needs **unless** any adverse impacts of doing so would significantly and demonstrably outweigh the benefits...or specific policies in the Framework indicate development should be restricted. Such policies include... **Green Belt.**"

Para 044 NPPG

All the South Essex LAs are fortunate to be surrounded by countryside which is designated as Green Belt, and which can therefore be cited as a reason to not meet OAN.

LAs should produce Local Plans which include lower-than-OAN Housing Targets, citing constraints such as Green Belt designation and stating the economic harm that would arise as a result of the limitations to commuter rail links. Other issues infrastructure limitations might also provide a legitimate restraint.

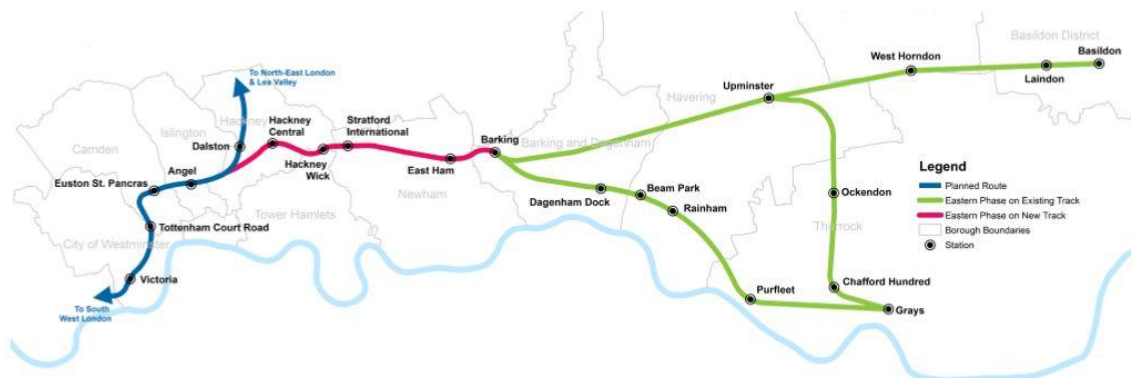
## 15. Appendix B – Major Rail Schemes

There are three potential transport infrastructure schemes that could meaningfully improve rail capacity in South Essex.

### 15.1. C2C – Crossrail 2 Eastern Branch

The Crossrail 2 proposal is currently on ice, but the project – or something like it – will be necessary if HS2 is to terminate at Euston as currently intended.

One of the options promoted by Essex CC, Newham, Havering and others was for a branch to head, via Stratford International to South Essex – partly on new track and tunnels, and partly using the existing infrastructure. This option has been accepted as a potential long-term aim.



### 15.2. C2C – Moving Fenchurch Street Station

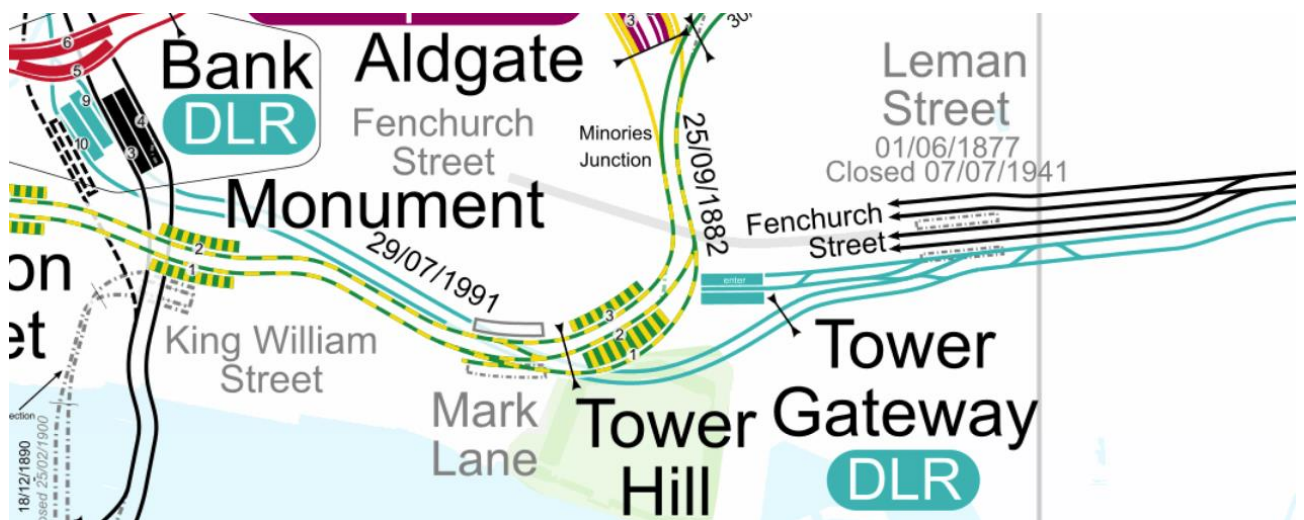
Network Rail recognise the constraints on C2C arising from the small size of the Fenchurch Street terminus which has just four platforms, limiting the frequency of services at peak times.

The station does not have room to expand, so to overcome the constraint Network Rail have an aspiration to move the station 350 metres eastward to resolve the issue.<sup>23</sup>

The idea would see Tower Gateway DLR station closed and all DLR services would instead terminate at Bank station. The two platforms of Tower Gateway would become C2C platforms, with the four Fenchurch Street platforms would move 350m east to create a new 6 platform station.

Although highly disruptive to commuters, the scheme would on completion allow more services to be provided. However, the idea is not costed or funded.

<sup>23</sup> [Weston Williamson unveils plans to move Fenchurch Street station \(architectsjournal.co.uk\)](https://www.architectsjournal.co.uk/news/weston-williamson-unveils-plans-to-move-fenchurch-street-station)



**Figure 10: The scheme would see Fenchurch Street station closed, and Tower Gateway platforms incorporated into a new 6 platform terminus.**

### 15.3. Anglia – Brighton to Cambridge Line

The National Infrastructure Commission's recent report argued that there was 'currency' in the idea of a future Crossrail/Thameslink type rail link, passing through London on a Canary Wharf/Stratford axis.

The southern end of such a line would probably be Brighton, due to the presence of the largely surviving trackbed of a railway closed in the Beeching era. The BML2 (Brighton Main Line 2) campaign has been promoting such a line for years.

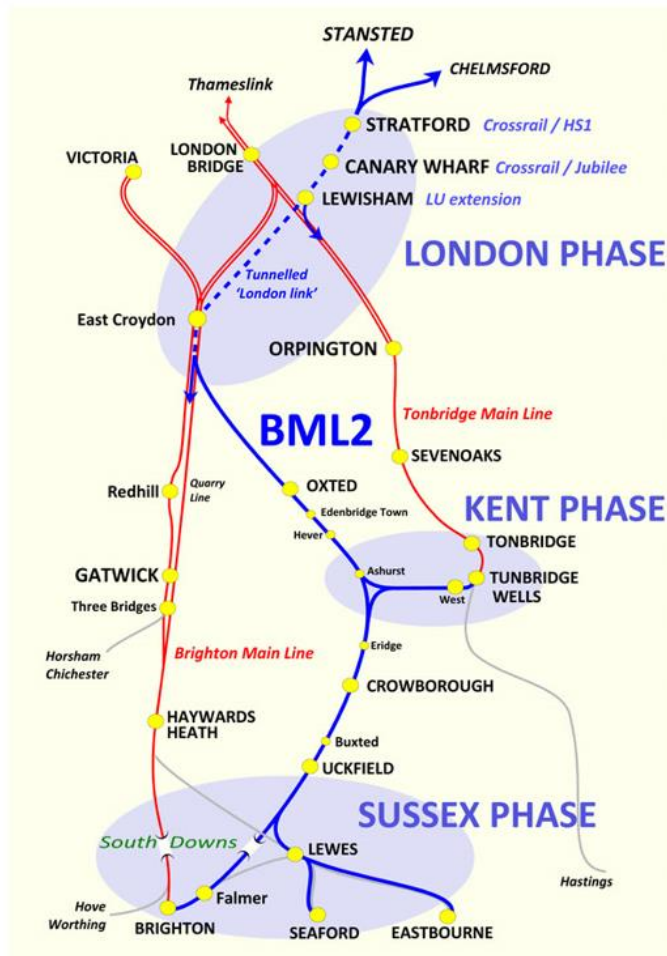
The northern end of the line would connect in some way to the Anglia network, either East Anglia heading to Chelmsford and beyond, or more likely West Anglia heading to Harlow, Stansted and Cambridge.

Any version linking to the Anglia network (especially the East, via Chelmsford) would divert trains from certain pinch points of the network (especially Liverpool Street Station) allowing new services to be added to the peak and high peak periods of the timetable, including, potentially on the Southend Victoria branch.





A three-phase engineering project delivering more route capacity for London & the South East



**Figure 11 - THE BML2 (Brighton main Line 2) campaign hopes to add a new route across London, to Chelmsford, or more likely Stansted and Cambridge. Such a scheme could indirectly offer significant relief to the Southend Victoria branch.**

Cambridge is being promoted by the government and opposition as a major growth centre, raising the prospect of such a scheme being approved. If the scheme went ahead, it would be unlikely to be available until at least the late 2040's.

## 16. Appendix C – Billericay Road Proposals in the Withdrawn Plan

There were four main measures, proposed by Essex County Council, and associated with the withdrawn local Plan, which were intended to mitigate the existing traffic problems and, less credibly, allow further growth:

- The Relief Road: A partial by-pass intended to relieve Sun Corner and possibly some other junctions by redistributing traffic to western parts of the town. It is credible to argue that (without the Local Plan growth) that Sun Corner would have been relieved, but the net effect was harmful. Simply put, the idea would move traffic away from congested Sun Corner, but this would be outweighed by other factors:
  - New roads generate extra traffic, this is known as “induced demand”, car journeys that otherwise would not have been taken.
  - Rerouting traffic to west Billericay would have severe impacts there which the junctions demonstrably cannot take.
  - The housing developments associated with the new developments were expected to generate at least 11,000 extra car journeys per day. This is quite apart from extra traffic associated with developments in the rest of Billericay and south Essex.

The argument that there should be no Green Belt sites allocated in west/south-west Billericay without traffic solutions was correct, but the Relief Road was counter-productive, and must not be resurrected.

- Laindon Road Two-way proposal: There appear to be mixed views in the community about whether this would be effective in relieving traffic around Sun Corner and whether the net effect is desirable. Some argue that the junction would be more efficient, and some express concerns about whether about the increased traffic on Laindon Road, especially with regards to disruption and safety around Billericay and Quilters schools.
- Laindon Road Two-way with a slip road: The proposal to use part of the Queen Elizabeth Community Field (Sun Corner) for a slip road to relieve traffic should not be incorporated in the new plan. It is credible to argue that it would increase theoretical junction capacity, but the loss of parkland and the greater difficulty in accessing that parkland would significantly reduce the utility of the open space and adversely affect the High Street Conservation area.
- Sun Corner Traffic lights: The suggestion that there should be traffic lights instead of a roundabout at Sun Corner seems uncontroversial within the community and there seems to be some support. Such a change could be reversed if unsuccessful.
- Norsey Road one-way: In 2011, the start of Norsey Road (by the High Street/Western Road traffic lights) was closed to improve the High Street Conservation area and improve pedestrian safety. Unfortunately the impact on traffic was severe and the trial stopped.

Essex CC are still enthusiastic about the proposal and as a result the withdrawn Local Plan included a one-way proposal for the same section of Norsey Road believing it would be beneficial from a transport perspective.

We are pessimistic and think the impacts on traffic are likely to be adverse. When the road was closed last time, the effects were most profound north of the railway with a lot of traffic building up around the former hospital site and Jackson's Lane.

If such a scheme were to go ahead it might improve the historical setting of the High Street (unless that were cancelled out by increased traffic), but would further reduce the suitability of SE Billericay (which is reliant on Jackson's lane as a route to central Billericay) as a location for growth.

Recent experience around traffic mitigation schemes from Essex County Council (Norsey Road Closure around 2011, and the northern Noak Bridge roundabout fiasco in 2022) show that the net effects of traffic mitigation measures are very hard to predict – and therefore using these uncertain proposals as a justification for large scale growth is dangerous.