



BAG Information & Guidance on Local Plan Issues

Why should I respond to the Consultation?

1. The more responses and comments made the greater the impact.
2. We need to make both the council and the planning inspector aware of the impact that the local plan will have on Billericay - you live in the town and so have valuable real life experience and local knowledge that the planning officers and planning inspector will not.
3. You need to make your voice heard - let the council and planning inspector know what you think of the plan and most importantly let them know if there are any aspects that you disagree with or would like to see changed.
4. You need to engage with the democratic process and demonstrate your interest in what happens locally - your councillors are elected by you, to represent you and by engaging it can increase their sense of accountability.

What do I say in my Consultation Response?

The local plan is a lengthy document but do not feel put off - you live in the town and your real life experience and local knowledge counts - particularly for the planning inspector who probably doesn't live here. In a large consultation like this you want to ensure that your comments have the maximum impact - what you say and how you say it can help this.

1. Focus on what is important to you.
2. Local knowledge and life experience is valuable.
3. Provide evidence where possible - research, letters, photographs - to back up your argument and add credibility to your response.
4. If possible have the relevant documents handy and when responding to particular policies/sites state the policy numbers.
5. Try to avoid a negative sounding response, for example: "I disagree because I would lose my view..." would be better phrased "I have concerns about the detrimental impact on the landscape....."
6. Don't forget to make positive comments about anything in the Local Plan you agree with.

Most importantly, don't leave it to others to respond.

Every response is important and valuable, even if it only addresses one point.

Note: You can submit one response per person – it's not one per household.

Understanding the Issues

What is the Local Plan?

A Local Plan sets out a Local Authority's housing, infrastructure and other development plans and policies, in our case for a period of twenty years. The single most important part of a Local Plan is its Housing Target.

At one time it was widely believed that without a Plan in place, an area's ability to protect its Green Belt would be lost. Thankfully this fear has proved unfounded, but there are still many good reasons to have a Local Plan.

The Basildon Plan has gone out to consultation. Members of the public and organisations such as developers, utility providers and other Local Authorities are invited to comment. This is likely to influence the Plan to a greater or lesser degree. It will be revised and ultimately submitted to an independent Planning Inspector who will examine the Plan to determine if it's sound. It must comply with planning policy and the evidence presented must support the plan. The inspector will either approve the Plan or require changes.

A very large number of authorities lack a Local Plan so central government has said it will begin to intervene and take over the process for areas which have not submitted a Plan by Spring 2017. This is not ideal, but it shouldn't be assumed that this would be a doomsday scenario. It can be argued that central government would impose a lower housing target than Basildon is imposing on itself.

About the Green Belt

Green Belt designation is meant to make land 'permanently open'. Development on Green Belt is inappropriate and local authorities are expected to refuse planning permission except in exceptional circumstances. An example of exceptional circumstances is nationally sponsored infrastructure development such as the local Motorway links proposed as part of the Lower Thames Crossing project.

Basildon Council is not proposing to allow building on Green Belt land: it can't. But it is proposing to use the Local Plan process to take land out of the Green Belt so that it can subsequently permit development. The Local Plan process is the only opportunity to take land out of Green Belt.

At one time it was thought that the new National Planning Policy Framework (NPPF) regulations meant Councils were obliged to de-designate areas of Green Belt if it was necessary to meet their Objectively Assessed Needs for housing (OAN). It's now clear that this is not the case. Councils are expected to retain existing Green Belt boundaries unless they have very special circumstances to justify any change. Meeting their OAN does not count as a very special circumstance. Indeed Councils can use the presence of Green Belt as a constraint to meeting their OAN. They can say for instance "We will only build two-thirds of our OAN as we wish to preserve some/all of our Green Belt."

The National Planning Policy describes the five purposes of the Green Belt as:-

- To check unrestricted urban sprawl
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns: and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

A further benefit of the Green Belt is that it protects London's transport infrastructure from being stretched past capacity. In the 1940s it was recognised that rapid growth at and near London's periphery was overwhelming the transport infrastructure taking people to work in central London. The creation of the Green Belt was intended to channel growth to areas where capacity was available or could be made available- that is to say to more central parts of the city and areas far away from the city.

The situation has evolved since that time but Green Belt still informally serves this purpose and in this way protects London's economy. Green Belt areas such as SE Essex do not have the transport capacity or potential capacity to contribute much if anything to London's housing needs.

Basildon's OAN and Housing Target

The Council are proposing to build a minimum of 15,260 homes in the borough, a self-imposed target that is likely to be exceeded by some margin. As well as environmental damage this number will have severe negative economic and social impacts.

The Council is expected to produce a Local Plan and, as part of this, must produce an Objectively Assessed Need for housing.

The first point to note about Objectively Assessed Needs in any area is that 'Need' is a misnomer as it must include an allowance for migration and this is usually taken to mean that past rates of migration to an area are assumed to continue. Basildon's approach is extreme and is based on accelerating migration from London, meaning that at least 37% of the new homes will be for people from outside the area.

Authorities in non-Green Belt areas are usually expected to meet their OAN, but those fortunate enough to have Green Belt are not. They can produce a sub-OAN Housing Target. Castle Point has recently decided to produce a Plan that protects Green Belt in this way.

We don't have to build on Green Belt!

Basildon can build around 8000 homes, arguably more, without loss of Green Belt or other green sites we choose to protect. This is the minimum number that the borough can choose to build.

Basildon's local need, the housing needs of its people and their children is in the region of 9600. Building that many would unfortunately mean choosing to lose some Green Belt, but nothing like the scale proposed. Our borough differs in this respect from neighbours like Brentwood and Castle Point that can easily cover their local needs on brownfield sites.

Basildon is proposing a policy of accelerated migration from London. Their rationale is as follows:-

- There is a long term economic forecast\guesstimate that the borough could see 8600 jobs created over the next 20 years.
- Consultants have concluded there are not enough people in the area to fill these jobs and Basildon should choose to bring in many thousands of extra workers and plan for the building of new homes for these workers and their families.
- The consultants assume that the thousands of local unemployed will remain so and they have discounted them in their calculations. They also assume that few of the borough's 18,000 part-time workers will take the opportunity to go full time and that half of the borough's workforce will continue to commute rather than take jobs closer to home.

As described, the minimum number Basildon must build is 8,000 though our local need is 9,600. A standard approach to calculating OAN, based on past rates of migration would bring us to 11,200 – 13,200, but Basildon Council goes further by choosing to accelerate migration from London and build a minimum of 15,260.

Our environment and quality of life will suffer and our economy will suffer too as the infrastructure is strained under the extra load. The railways are a particular problem as there is now very little extra capacity that can be added to the railway line and demand is expected to grow enormously over the coming years. The impact of this mismatch between supply and demand will be that commuting to highly paid jobs in London will become less viable and less tolerable as people won't be able to get on trains let alone find a seat.

The social impact of the proposals is that – even if these jobs do come - there will be an oversupply of workers leading to increased rates of joblessness and lower wages and job security. And what happens if the jobs don't come? The Council Plan makes the borough a hostage to fortune.

The economic policy will have a social cost and the infrastructure implications mean it will be self-defeating across all economic sectors.

Affordable Housing

The 2014 draft of the Local Plan included a requirement that 36% of housing would be 'Affordable'. The 2016 draft has reduced that to 25%.

There are various categories of Affordable Housing, with 'Social Housing' being the most affordable. 'Social Housing' includes Council Homes and Housing Association properties with rent levels far below other types of rented Affordable Homes.

The Council intends to build some additional Council stock, but the Plan includes no ambition or policy on the number or proportion of 'Social Housing' units to be delivered.

Railways

Over 20% of the borough's workforce, more in Billericay, commute to London by train and these people generally have better paid jobs than counterparts working more locally. The local economy is heavily dependent on London and our railway links to it, but unfortunately the Local Plan includes no more than a couple of paragraphs on railways as Network Rail, Abellio and C2C have not been in contact with Basildon Council.

BAG has been in touch with these bodies and established that the situation is very bleak.

The Liverpool Street line is acknowledged to be at capacity at peak times and National Rail estimate that demand on the Liverpool Street-Southend Vic Line will grow 23% in 2013-23 and 69% in 2013-43 and there are reasons to increase these estimates still further.

Basildon Council's Local Plan is based on the accelerating migration from London in order to help meet the housing shortages there. However, for sustainable development to occur, capacity must keep pace with demand and there are two main ways to increase capacity, namely train length and frequency.

However trains are all 12-car at peak times (except those via Southminster which are 8 and cannot currently be extended) and it is not feasible to extend them further, so that leaves the question of train frequency. The limiting factor is the congested stretch between London and Shenfield which is currently at capacity running 22 trains per hour (excluding Metro services which will be replaced by Crossrail). Of these 6 trains per hour continue onwards to Southend Victoria while others head to Norwich and other destinations.

Crossrail makes no direct impact, but the indirect impact is that it opens up the potential for a further £100m of infrastructure works at Bow Junction which would, when approved, allow an increase to 24 trains per hour – i.e. two more trains per hour, each with a seated capacity of 850 passengers.

If and when this goes ahead there is a chance that one or both of these extra services will go on the Southend Victoria route but we will be competing for these services with routes to Witham, Colchester, Ipswich, Norwich and other places.

If these extra two trains per hour are delivered capacity on the network will increase to its maximum potential. Even if these two extra trains come to Billericay capacity will only increase by 33% while demand increases by 69%.

This leaves the railway company with the only option of adding a little further capacity by removing seats to increase standing capacity. BAG have been verbally advised by Basildon planners that this is under consideration.

C2C also faces similar challenges so Billericay and Wickford commuters should not assume they'll continue to have a viable alternative using the C2C line as they do now.

Even if Basildon exercises its right to build on little or no Green Belt, commuting to London will become impractical and intolerable for many. South-east Essex's economy will suffer and so will London's as many of the railway lines in areas close to London (ie the Green Belt) suffer similar problems.

Basildon Borough is not an economically sustainable location to meet London's housing needs. We face a real threat of economic decline even without the accelerated migration that Basildon Council has chosen to propose.

Local Roads

To provide for the planned new homes, Basildon Council proposes:

- To seek developer contributions for a link road to run from Laindon Road, across open fields to Frithwood Lane, over Tye Common Road to cross further fields to join London Road. The Plan lacks detail about exactly where the road would go and uncertainty about when and how it would be funded and delivered.
- A new roundabout at the junction of London Road and Mountnessing Road. This may cause extra traffic to use Mountnessing Road.
- Removal of the one-way restriction on Laindon Road - all north-bound traffic would be encouraged to use Laindon Road. This is of particular concern as there are two schools served by Laindon Road.
- For the Laindon Road scheme to be viable, a new left turn slip lane would be needed at Sun Corner over the QEII field. This would require the removal of the pedestrian crossing for safety reasons.

There are no road upgrade proposals for East Billericay despite the proposals for 640 new homes there.

Health

The borough's health infrastructure is badly strained and there is acknowledged to be a shortage of GPs. Our local hospitals at Basildon, Southend and Broomfield are spending significant periods in 'Black Alert'.

The Council isn't responsible for healthcare and can do little to improve its provision. The Plan seeks to use developers' contributions to improve future surgery facilities, but this will not attract the additional GPs needed now and during implementation. The plan says nothing about the severe situation in our hospitals.

Our Council isn't responsible for health services (so there's little it can do), but it is responsible for Local Planning. Our overstretched health infrastructure is another reason for our Council to reconsider their policy of accelerated migration and population growth.

Strategic Roads – A127 and A13

Basildon Council is not responsible for these roads, but it recognises the difficulties these routes face – for instance that the A127 is heavily congested and as busy as some motorways. The Council has been pro-active in making proposals for capacity improvements to the bodies responsible for funding such improvements.

Basildon Council has secured funding for some junction improvements and is lobbying for more. In the long term, it hopes to persuade relevant bodies to fund widening of the A127 and A13, but these would be multi-billion pound projects so they face an uphill battle.

Schools

No new schools are proposed, existing schools are expected to expand. Primary Schools in the south of Billericay will be worst affected, notably Quilters School.

When you have read BAG's guidance & information please complete the Response Form below adding any additional comments and evidence on a separate sheet

Please do not send this Guidance and Information with your Response Form

Consultation Response Form

When you have completed your response you should send it to:-

Draft Local Plan Consultation 2016

FREEPOST ANG11276

Policy & Democratic Services

The Basildon Centre, St Martin's Square, Essex, SS14 1ZZ

Basildon Council is proposing to build 15260 homes as part of the Local Plan. What level of building would you support?

- No loss of GB or other Green Spaces we choose to protect – Approx 8000
- Sufficient to meet local needs – Approx 9600
Some Green Belt loss
- Sufficient to meet local needs plus an allowance for migration. Migration slower than historic rates – Approx 9600 – 11200
Further Green Belt loss
- Sufficient to meet local needs plus an allowance for migration continuing at historic rates – Approx 11200 – 13200
Higher level of Green Belt loss
- The current approach of accelerated migration in order to boost the workforce - At least 15260.
Highest loss of Green Belt - as described in the draft Local Plan

What is your view on the proportions of Affordable Homes proposed?

- A higher proportion of Affordable Homes should be required
- 25% is about right.
- A lower proportion of Affordable Homes should be required.

What is your view on the absence of a Social Housing policy in the Local Plan?

- There should be a specific policy to facilitate the delivery of a particular number or proportion of Council and other Social Housing units.
- I am happy that Affordable Housing is addressed in general terms with no specific policy on delivering numbers of different types

Basildon has been unable to add any information on how additional railway capacity might be provided.

- I am satisfied that the railways can cope with the planned population increase.
- I am not satisfied that the railways can cope with the planned population increase.

Basildon Council's roads policy focusses on seeking to persuade central government to deliver widening of the A127 and A13 and other road improvements

- I am satisfied that this approach to strategic roads will be sufficient to sustainably cope with the planned population increase.
- Not Sure\Other
- I am not satisfied that this approach to strategic roads will be sufficient to sustainably cope with the planned population increase.

Are you concerned that there is nothing in the Local Plan to address Billericay's parking problems

- I am concerned because it is already difficult to park in Billericay town centre
- I do not believe additional parking in the town centre is necessary

Billericay Green Belt developments (including site reference numbers) are listed below.

Please indicate whether you agree with development on these sites or disagree.

	I agree	Other\Not Sure	I disagree
North of Potash Road (H19)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
West of Tye Common Road (H20)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
South of London Road (H21)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
West of Mountnessing Rd (H22)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
East of Frithwood Lane (H23)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
South of Windmill Heights (H24)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
West of Kennel Lane (H25)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
East of Greens Farm Lane (H26)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
East of Southend Road (H27)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you agree that the proposed Link Road is required and viable?

I agree Other\Not Sure I disagree

Essex County Council proposes to build a new roundabout at the junction of Mountnessing Road and London Road. What is your view?

I agree Other\Not Sure I disagree

Essex County Council proposes to make Laindon Road two-way all along its length, removing the one way section at its southern end, and proposes to encourage all northbound traffic to use this road. Do you agree?

I agree Other\Not Sure I disagree

It is proposed that there will be a slip road cutting the corner of the Queen Elizabeth Playing Field at Sun Corner and the removal of the pedestrian crossing. What is your view?

I agree Other\Not Sure I disagree

Do you consider that the measures in place are sufficient for Hospitals, GPs and other Healthcare Providers to cope with the planned population increase without their services deteriorating?

I do Other\Not Sure I do not

Are you satisfied that the measures proposed in the draft Plan are sufficient for local Primary and Secondary schools to cope with the planned population increase?

I am Other\Not Sure I am not

Please use your personal knowledge to attach any additional comments and evidence before completing your personal details below.

Name:

Full Address: