



BASILDON LOCAL PLAN **PRE-SUBMISSION PUBLIC CONSULTATION**



Basildon Council launched the next, and presumably last, public consultation on the Local Plan on November 1st. This is the Pre-submission or Regulation 19 Consultation. **The closure date is Monday December 17th (5pm).**

BDRA opposes the Basildon Local Plan because it sees no benefits for Billericay or for Billericay residents, and believes that it will result in a substantial deterioration of the quality of life for current and new residents alike.

BDRA is urging all its members and supporters, and the public at large, who agree with that assessment to respond to the Regulation 19 consultation, and is providing help and guidance as to how to go about that.

The Regulation 19 Consultation is all about the 'Soundness' of the Local Plan – that is, has it been prepared according to the rules and is it consistent with national planning policies (the National Planning Policy Framework - NPPF).

BDRA believes that there are number of key aspects of this Plan where that is not the case – it is not sound. An outline of the main issues, based on the advice of our professional consultants, can be viewed by clicking on the following links. These pages provide ideas and background, but should not be simply cut and pasted into individual responses, because identical inputs are counted as only one response.

Why the Local Plan is Considered to be Unsound

Tests of Soundness

<https://www.billericayactiongroup.org.uk/r19-1.html>

Lack of Meaningful Consultation

<https://www.billericayactiongroup.org.uk/r19-2.html>

Lack of Sustainability Analysis for Housing Development

<https://www.billericayactiongroup.org.uk/r19-3.html>

Inadequate Analysis of Traffic Effects

<https://www.billericayactiongroup.org.uk/r19-4.html>

Inadequate Analysis of Effects on Commuting

<https://www.billericayactiongroup.org.uk/r19-5.html>

Exceptional Circumstances Justifying Green Belt Loss

<https://www.billericayactiongroup.org.uk/r19-6.html>

Responders may of course elect to comment on other aspects of the Plan beyond these 'Big Ticket' items. In particular those with local knowledge might want to make comments relating to specific site/s.

How to Respond to the Regulation 19 Consultation

Basildon Council's Regulation 19 Consultation website is found at this link -- this provides all the official information and supporting data :

<http://www.basildon.gov.uk/localplan?fbclid=IwAR18AdX7mr9vhWrOYXSLj5XqpaWDEO7m0egjJXW8VJLZgzEgcPdTA-Mk61k>

That website contains a link to **the form that should be used** for responding (more about the form below) :

<http://www.basildon.gov.uk/CHttpHandler.ashx?id=8654&p=0>

(This is based on the standard form that the government recommends to be used).

Online Response is also possible by clicking this link :

<http://basildon-consult.limehouse.co.uk/portal/localplan/rplp>

You have to register in order to use this facility. If you are already registered you can just log in, and there are links there for both options.

Once registered and logged in, the online system does not ask for the Part A information because it already has that.

To complete Part B, click the *View and Comment link* near the bottom of the page. This takes you to a screen where Part B can start to be completed. Then use the *Next* link at the extreme bottom right to move to the next page/s.

It might be expedient to save the input as a draft using the *Save as Draft* link at the bottom right. This will enable changes to be made before the comment is finally submitted.

To finally submit, click of the certification statement on page 4 and then click on the *Submit* link at the bottom of page 4. This will only submit that comment, not any other comments you have made.

To start a new comment, having saved one as a draft, click of the Revised Local Plan link at the top left, and then the *View and Comment* near the bottom of the page. Then complete the input for the new comment and save it as a draft or submit it.

To go back to comments that have been saved as drafts but not yet submitted, click the My Account link at the top right of the screen. Then click the *Drafts* link under the Comments heading. This produces a list of saved comments which can be viewed or clicked on for further amendments to be made.

Freeform Submission

The Council's frequently asked questions section says as follows :-

“You can provide your comments in a few ways, either online through the Council’s special website www.basildonlocalplan.co.uk or in the specially designed Consultation Response Booklet. Both methods will guide you through what information you need to provide in order for the Planning Inspector to be able to consider your comments.

If you do not provide your comments as recommended above, you will need to be clear in your response whether your comments relate to the test of soundness or legal compliance.

The Inspector will also need to know whether you would like to speak at the Examination in Public which is anticipated to start sometime in Summer 2019.”

In other words use of the official form is recommended in order to ensure that responses are valid and complete. For anyone who has difficulty in obtaining or completing the form, or completing an online response, a freeform response posted or emailed, as described above would be better than nothing.

Completion of the Form

The Form is presented as a ‘booklet’ and contains guidance notes.

Some important points :-

Everyone must complete and return **Part A** once – anonymous responses are not accepted.

Part B must be completed separately for each individual topic commented on. This might be just one topic, but there is no maximum to the number of comments that can be submitted. The booklet allows for 5 topics to be commented on, but more can be submitted by using further booklet/s. We are advised that is best to stick to a limited number of significant subjects.

In **Part B** it is necessary in **Section 1** to **quote a reference** to the particular section of the Local Plan being commented on. A guide to relevant references for the main topics is as follows :-

Lack of Meaningful Consultation – Policy SD2

Excessive Housing Target and Unwarranted use of Green Belt Land – Policy SD1

Disproportionate allocation to Billericay within the borough – Policy SD2

Transport and Social Infrastructure – Policy SD1

The South West Relief Road – Policy H17

Individual Sites :-

Land North East of Potash Road - Policy H16

South West Billericay - Policy H17

Land South of Windmill Heights - Policy H18

Land East of Greens Farm Lane - Policy H19

Land East of Southend Road - Policy H20

Self-Build Allocations – Policy H21

For other topics a list of all policies is provided on Page 11 of the main Local Plan document, available on Basildon Council's website as stated above.

It is advisable to complete at least one box in Part B Section 1.

In **Part B Section 2** tick the box NO in the second line – 2.Sound? , in order to comment on Soundness issues.

Part B Section 2a requests a designation of the comment made according to the 4 Soundness criteria which are explained on Page 1 of the form. Basildon Council says that the purpose of this is so that representations will have better chance of being given focussed consideration at the Examination. It is advisable to tick one box based on best judgment, but Basildon Council has given an assurance that responses will not be rejected just on the basis of box ticking issues.

Parts C, D, and E are optional, but a **dated signature** is required at the bottom of the last page.

Making comments

Section 3 is for making your comments and **Section 4** for saying what you think should be done about it.

It should be borne in mind that the consultation is about the soundness of the Plan. Therefore comments are best kept matter of fact, impersonal, and unemotional.

Say for example someone was inclined to comment on the so called 'spatial strategy', whereby housing has been allocated across the borough on population rather than based on sustainability analysis, as required by national planning policy. Such a comment is best kept to discussion of what has been done compared with what should have been done, according to the rules. Prolonged discussion of the anticipated consequences is not advisable. The remedial action – that is to say what should be changed in the Plan -- would be revising the allocation across the borough based on a proper sustainability analysis.

Submission of the Response

The completed form has to be returned to Basildon Borough Council **no later than 5pm on Monday 17th December 2018, by one of three alternative methods :-**

email : planningpolicy@basildon.gov.uk

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

Online, as described above.

Other References and Recommended Reading :-

The website of the Billericay Action Group, BDRA's planning division, contains a lot of useful information about the local plan, including a map of the proposed sites:-

<https://www.billericayactiongroup.org.uk/>

Two particularly useful sections of that website are :-

Local Plan Structure : <https://www.billericayactiongroup.org.uk/local-plan-structure.html>

Regulation 19 Consultation : <https://www.billericayactiongroup.org.uk/regulation19.html>

The National Planning Policy Framework contains the rules and requirements for Local Plans :

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf

Facebook: 'Save Billericay from Housing Developments' – 4,200 residents use this page for news, updates, to share ideas and chat.

We hope that all BDRA members and supporters who share our concerns about the Local Plan will respond individually to the Regulation 19 Consultation during November and December. We are advised that a large number of individual responses from Billericay residents will add weight to the arguments being levied.

BDRA/BAG will be submitting a professionally prepared response on behalf of the BDRA membership. Any members who want to opt out of being associated with it may do so, details of how to opt out are in the November issue of The Resident magazine.

A leaflet will be delivered to every home in the town during November with a view to increasing public awareness and maximising the number of public responses to the Regulation 19 Consultation.

The Next Steps

The Local Plan will be submitted to the independent Planning Inspectorate in Spring 2019, together with matters raised during the consultation. An Examination in Public (hearings) will then be held in Basildon, and in Billericay, during 2019. The target is for the Plan to be adopted by September 2019. After that developers can submit planning applications, and building work can commence if and when these are approved.

For More Help

To ask questions, or to ask for specific help or advice, to make comments or observations, or to share experiences of completing the consultation form, please email :-

resident@bdra.org

or

bdra_public@btinternet.com (direct to the Local Plan team)

APPENDICES

1. Local Plan Billericay Site Map
2. Further Details of Unsoundness Factors

APPENDIX 1 – LOCAL PLAN BILLERICAY SITES MAP



APPENDIX 2 – FURTHER DETAILS OF UNSOUNDNESS FACTORS

- **Very high overall housing target the borough has set itself- and the unnecessary loss of Green Belt land**

- State policy SD1 in section 1 of the form
- State 'No' to Soundness in section 2
- In section 2a you can tick to indicate that this is not *justified* and not *consistent with national policy*.
- In section 3 write as much or as little as you like about the issue.

This is a good place to write about problems such as the railways, the A127 and other infrastructure issues.

- **Disproportionate loss of Green Belt around Billericay**

- State policy SD2 in section 1 of the form
- State 'No' to Soundness in section 2
- In section 2a you can tick to indicate that this is not *justified*.
- Fill out any desired details in section 3, but you might have already done this for policy SD1, above.

- **The South West Relief Road**

- State policy H17 in section 1 of the form
- State 'No' to Soundness in section 2
- It's counterproductive so in section 2a you can indicate that the policy is not *effective*.
- Describe any problems with the idea and the details of the road scheme in section 3.

- **Individual Sites**

The policy numbers are listed below. For each site you wish to comment on state that it is unsound in Section 2 and Not Justified in section 2a.

As before, write whatever you wish in section 3, and don't worry if you are repeating things that you've written elsewhere.

- H16 – Potash Road
- H17a – Mountnessing Road
- H17b – London Road & the Sports Clubs
- H17c – Tye Common Road
- H17d – Frithwood Lane
- H18 – Windmill Heights & Kennel Lane

- H19 – Southend Road, South Green
- H20 – Greens Farm Lane
- H21a – Billericay School
- H21b – Maitland Lodge, Southend Road
- H21c – The Mount, adjacent to Norsey Wood

General Background -- Points to Consider

Overall Housing Target and the large allocation to Billericay -- the borough will be building more new homes than they are obliged to, more than local people need and, more than local people want.

Council's aren't obliged to build on their Green Belt. Those that are lucky enough to have Green Belt can use it as a reason to build less. Public consensus is meant to be a major factor if Councils wish to remove land from the Green Belt.

Billericay has been disproportionately targeted, with about 50% of homes on current Green Belt land to be built here.

Building so many new homes is not economically sustainable, especially in infrastructure terms, there are issues such as:

- Train capacity
- A127 and other strategic roads capacities
- Local roads capacities
- Vehicle parking availability
- 2,800 homes but no new jobs in Billericay
- GPs and Hospitals ability to cope
- Primary Schools (Secondary schools might cope but would no longer be able to admit children from outside of Billericay)
- Sewage handling capacity
- Much accessible countryside lost.

The SW Relief Road – the idea is counter-productive, insufficient thought has been given to traffic flows when traffic exits either end of the road, to rat-running, or to the practicalities of junctions. The Council has not thought through the practicalities, so your personal experience and local knowledge could help the Inspector make the appropriate decision.

- Flawed Concept
 - o Would create multiple new rat-runs
- Design
 - o The Frithwood Lane junction would sever Tye Common Road with a new crossroads
 - o The Relief Road would be narrow, narrowing further in the crucial Frithwood Lane area

- Potentially unacceptable effects on resident in the Frithwood Lane area
- It appears there would be an informal extension of the Relief Road through the H17a Mountnessing Road site, so that traffic heading north would discharge on to Mountnessing Road, with its narrow hump-backed bridge.

Individual Sites

The Planning Inspector is not familiar with these sites, but local residents are. The following is a list of some of the problems that have been brought to BAG's attention, which should have been considered **had a proper sustainability study been carried out for Billericay and acted upon :-**

The North

- H16 Potash Road
 - Potash Road narrow with poor sightlines
 - The two potential access roads are too narrow
 - The development goes right up to the border. Chelmsford would be tempted to expand the site on their side of the border as Brentwood did with Basildon's Dunton proposal.
 - Environmental - no consideration of the high probability that rare dormice and badgers are present
 - A long distance from the High Street and other services

The South-West

- H17a – Mountnessing Road
 - Accessible countryside lost
 - Impact on Mountnessing Road
 - Long distance views lost.
- H17b – London Road (including cricket and tennis clubs)
 - Accessible countryside lost
 - Issues around desirability of placing sports clubs on agricultural land.
- H17c – Tye Common Road
 - Long distance views lost
 - Impact on Tye Common Road
- H17d – Frithwood Lane
 - Loss of an accessible 'Green Wedge' close to the high street.
 - Immediately adjacent to High Street (architectural) conservation area.
 - Close to Little Burstead (architectural) conservation area.

- Elevated site (in part) so would impose on the skyline.
- Ecologically sensitive, adverse impact on wildlife and setting of nearby Frith Wood and Laindon Common.
- H18 - Windmill Heights
 - Access would be onto highly unsuitable Kennel Lane. Would access via the main roundabout on the A176 be better?
 - Would aggravate existing flood problems in the Kennel Lane\Church road area.

The South-east

- H19 – Southend Road, South Green
 - Impact on A129 and St Peters School
 - Little protection for important hedgerows.
- H20 a&b Greens Farm Lane
 - Would significantly narrow the wildlife corridor between Mill Meadows and the wider countryside
 - Impact on Greens Farm Lane and Outwood Common Road
 - An elevated site (in part), very prominent on the skyline.
 - Little protection for important hedgerows

Luxury self-builds

- H21a – Billericay School
 - We have not been consulted on this site
- H21b – Maitland Lodge, Southend Road
 - Impact on A129
 - Drainage issues worsened by boundary disputes with neighbouring houses.
- H21c – The Mount, adjacent to Norsey Wood
 - We have not been consulted on this site.
 - Adjacent to Norsey Wood which is an Ancient Woodland and SSSI
 - Access via The Mount – residents there believe there may be practical problems around access.