INTRODUCTION

Essex County Council (ECC) welcomes the opportunity to respond to the consultation on the Draft Basildon Town Centre Masterplan (Draft Masterplan). This is the first opportunity for ECC to review and comment on the vision, guiding principles, strategic aim and proposals and we are committed to working with Basildon Borough Council (BBC) through focused collaborative discussions to ensure the masterplan's aspirations and proposals are sound, viable and deliverable.

The County Council response to the Draft Masterplan consultation identifies areas of support, where refinement and further consideration is needed, and issues where focused engagement between our two local authorities can secure the 'mutually beneficial outcomes' for Basildon and South Essex.

The importance of Basildon as a place, its people, businesses and environment are central to both councils' activities, as demonstrated by our partnership working to deliver the Intra Urban Infrastructure Strategy, in partnership with the National Infrastructure Commission (NIC) to develop an integrated strategy to enable long term transport, economic and housing growth aspirations to 2050. Both councils have partnered to deliver this strategy, which sets out the successes of our joint approach and the need for certainty in the longer-term funding for our local authorities to deliver strategic projects in partnership which meet government priorities. ECC sees this as a successful approach that can be used by the two authorities to engage, align priorities and secure outcomes for the town centre as the masterplan is reviewed and refined following this round of consultation.

The need to transform and re-imagine Basildon town centre is vital for it to be a place where people want to live, work, play, shop, do business and invest but the ambition in the Draft Masterplan for the long term future of the town centre needs to have a sound evidence base to ensure that the proposals are viable and can be delivered by all parties including ECC.

Of critical importance is the assessment and testing of proposals for their individual or cumulative impact on infrastructure and services, and subsequent impact on the town centre, adjoining Basildon neighbourhoods and the wider locality.

There are also challenges arising from COVID-19 and how these can be addressed in the masterplan to ensure its ambition and vision is realised. There may need to be a reassessment of the assumptions and resulting proposals focused on how the town centre will function in all its components; the quantum and type of office space; the type, size and quality of housing, and who will live there; and the quantum of retail space given the accelerated move to an online retail environment.

The Planning Practice Guidance (PPG) states that "masterplans can benefit from a collaborative approach" and that "care should be taken to ensure that masterplans are viable and well understood by all involved". [Paragraph: 007 Reference ID: 26-007-20191001]. Moving forward. Further consideration will be required by Basildon Borough Council (working with ECC and other key delivery partners) to ensure that the ensuing masterplan is shaped and informed by necessary and sound evidence to provide a solid foundation for the future of the town centre in an integrated and strategic manner.

This is a unique opportunity in which BBC working collaboratively in partnership with ECC and other public sector partners, can reshape the town centre, including the delivery of services such as the civic hub, or through the re-development work programme to identify and implement strategies to address inequalities or opportunities, to enhance the skills offer for apprenticeships and training (such as construction) and deliver improved connectivity, both transport and digital.

Key issues and messages of the ECC response

- 1. ECC notes and welcomes the Draft Masterplan's recognition of the important role of the town centre to support Basildon's growth, transformation of the wider area, and its role in South Essex:
- 2. Clarification is required on the status and planning procedures to progress the Draft Masterplan in compliance with national planning policy and guidance, be it as a Supplementary Planning Document (SPD) as initially intended, or incorporated into the submitted Basildon Local Plan (the Local Plan) as main modifications, as now indicated. The latter will have statutory implications for ECC as a delivery partner where any modifications will need to address soundness and reflect the duty to cooperate (the Duty).
- 3. Notwithstanding this, it is critical that the next iteration of the masterplan recognises the full extent of the challenges involved in ensuring the town centre itself is developed and improved to fulfil this future role:
- 4. Additional evidence is required to establish and assess the extent of growth possible, the wider intra-urban relationship of this growth, and to identify the necessary additional supporting infrastructure and services arising from the proposals and how this relates to the submitted Local Plan evidence. This is likely to necessitate:
 - further transportation and highways assessments and modelling, including assessment of the bus station, its capacity and relocation proposals;
 - a review and assessment of parking requirements and standards;
 - an assessment of education (including early years and childcare) and community services and facilities;
 - · employment and retail issues; and
 - ensuring housing provision and type reflects identified local need.
 - There is also benefit in undertaking a Health Impact Assessment to ensure health and wellbeing is comprehensively considered and integrated into the masterplan's proposals

 an area where ECC can advise and assist, and one we have successfully implemented in other areas across Essex.
- 5. Within all of this, consideration should be given to the challenges arising from COVID-19 and how these can be addressed to ensure the masterplan's ambition and vision is realised.
- 6. The masterplan should be supported by a clear delivery and phasing strategy and one that covers the required infrastructure, its cost, funding and timing, which must be viable and is agreed and is supported by the full range of delivery partners. This includes a balance of land uses to create great places for people and businesses; and that the developer funding for the required infrastructure is clearly identified, explicit, and deliverable and does not become a burden on the public purse.
- 7. Therefore, the level of ambition required to achieve a transformed town centre attractive to all users, residents, visitors and commerce needs to be recognised and accordingly a fresh collaborative approach towards the town centre, involving substantial change, appears necessary;
- 8. ECC wishes to see Basildon Council undertake more active engagement with the County Council following the end of the Draft Masterplan's consultation and develop a structured and collaborative work programme in accordance with the Duty to Cooperate. It is important to ensure that opportunities for fuller partnership working and concerted actions are not restricted as the masterplan evolves given its status and changing statutory relationship with the submitted Local Plan.:
- 9. Given the planning and development activity already taking place in the town centre, Basildon Council should ensure pre-application discussions and consultations for town centre sites currently coming forward are coordinated with ECC in a holistic way so that we can establish a clear picture of the scale of development coming forward in the short term to ensure alignment between Local Plan and masterplan proposals.
- 10. That as the Draft Masterplan develops over time, Basildon Council can facilitate the links between complementary activities and programmes across the full range of partners, so that all such actions are co-ordinated and deliver successful outcomes.

ECC INTEREST IN THE MASTERPLAN CONSULTATION

ECC aims to ensure that local policies and related strategies provide the greatest benefit to deliver a buoyant economy for the existing and future population that live, work, visit and invest in Essex. This includes a balance of land uses to create great places for people and businesses; and that the developer funding for the required infrastructure is clearly identified, explicit, and deliverable and does not become a burden on the public purse. As a result, ECC is keen to understand, inform, support and shape the formulation of the development strategy and policies delivered by local planning authorities (LPAs) within and adjoining Essex, including the preparation of this Draft Masterplan. Involvement is necessary and beneficial because of ECC's roles as:

- a full partner within Greater Essex, the Association of South Essex Local Authorities (ASELA) and, Opportunity South Essex Partnership (OSE); promoting economic growth, regeneration, infrastructure delivery and sustainable new development throughout the county;
- b. a major provider and commissioner of a wide range of local government services throughout the county (and where potential cross boundary impacts need to be considered);
- c. the highway and transport authority, including responsibility for the delivery of the Essex Local Transport Plan; Local Education Authority including early years and childcare, Special Education Needs and Disabilities, and Post 16 education; Minerals and Waste Planning Authority (MWPA); Lead Local Flood Authority (LLFA); lead advisors on public health; and adult social care in relation to the securing the right housing mix which takes account of the housing needs of older people and adults with disabilities, and;
- d. an infrastructure funding partner, that seeks to ensure that the developments proposed are realistic and do not place an unnecessary (or unacceptable) cost burden on the public purse, and specifically on ECC's Capital Programme.

ECC will use its best endeavours to assist Basildon Council on strategic and cross-boundary matters under the Duty, including engagement and co-operation with other organisations for which those issues may have relevance e.g. Highways England. In accordance with the Duty, ECC will contribute cooperatively to the preparation of a new masterplan as part of the new Basildon Borough Local Plan, particularly within the following broad subject areas,

- <u>ECC assets and services</u>. Where relevant, advice on the current status of assets and services and the likely impact and implications of proposals in the emerging Local Plan for the future operation and delivery of ECC services.
- <u>Evidence base</u>. Guidance with assembly and interpretation of the evidence base both for strategic/cross-boundary projects, for example, education provision and transport studies and modelling, and wider work across South Essex as part of the joint strategic plan.
- <u>Sub-regional and broader context</u>. Assistance with identification of relevant information and its fit with broader strategic initiatives, and assessments of how emerging proposals for the Borough may impact on areas beyond and vice-versa.
- <u>Policy development</u>. Contributions on the relationship of the evidence base with the structure and content of emerging policies and proposals.

ENGAGEMENT WITH ECC

In respect of the Local Plan (submitted for examination in March 2019), there has and continues to be constructive and on ongoing engagement by Basildon Council with ECC, under the legal Duty. It is recognised that the Duty does not apply to the preparation of the draft Masterplan as it was proposed to be adopted as an SPD. However, it is a matter of concern that there has been limited engagement with ECC as a key infrastructure and service provider in its preparation to date.

As stated in the introduction to this response, following this consultation, ECC wishes to see Basildon Council undertake more active and on-going engagement with the ECC and develop a structured and collaborative work programme in accordance with the Duty. The approach would

support BBC's range of procedural options in progressing the masterplan's preparation and can address the issues and matters raised by ECC. The outcomes can be used to inform the next iteration of the masterplan and assist ECC in understanding what modifications BBC may incorporate into the Local Plan as it relates to the town centre.

Specific guidance on how the Duty should be applied is included in the PPG. This makes it clear that the Duty requires a proactive, ongoing and focussed approach to strategic matters. Constructive cooperation must be an integral part of plan preparation and result in clear policy outcomes which can be demonstrated through the examination process.

The PPG makes it clear that the Duty requires cooperation in two tier local planning authority areas an places a legal duty on the local planning authority and county council to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters, and this will be will be critical to ensure that both tiers are effective when planning for strategic matters such as minerals, waste, transport and education.

SPECIFIC ISSUES

Transport and connectivity

The content and approach on transport has not derived from engagement with ECC as highways authority (and given ECC's broader strategic transport role). This includes some changes being mooted to key transport routes and details of sustainable transport proposals (that need to reflect the current NIC work and study). The potential relocation of the bus station and bus stopping changes is raised and any such matters also need to be subject to engagement with ECC including assessment of capacity, waiting areas and impact on road network (partly in the interests of practicality). Similarly, consolidation of car parking provision changes, car parking standards or restrictions need to be planned so as not to cause adverse highways and environmental impacts (such as increased parking on verges or open space together with a passenger transport assessment. The ambition and concept for sustainable travel are welcomed and supported in principle but need to align with the Local Plan requirements and the NIC study. Provision for electric vehicle charging and cycle storage should be enhanced.

Economic

The Draft Masterplan seeks to address the future economic role of the town centre and suggests the option of promoting its role for small businesses and small and medium sized enterprises (SMEs), which ECC supports. This would rely on providing the right kind of adaptable modern office space and this being delivered as part of phased redevelopment that changes the look, user-friendliness and feel of the town centre. This would seek to address the current market failings and the need for the provision of modern 'grow on space', flexible space and the provision of integrated digital connectivity (Smart technologies and the provision for digital connectivity to future proof internet access through full fibre network or 5G mobile) that is designed in as a requirement from the outset. These proposals thus place the town centre at the heart of activity, with a role that could complement Basildon's A127 economic growth corridor. Again, this needs to be part of a transformational change, promoting innovation, to encourage business confidence and the conditions needed for new investment.

Explicit reference should be made to appropriate evidence documents used to shape and inform the proposals, and to explicitly recognise the role of skills in creating successful local economies and the potential to enhance and expand the education and training offer, within the town centre at South Essex College and through higher education.

It is recognised that the submitted Local Plan gives consideration to the future of Basildon's many local neighbourhood (shopping) centres. This raises an issue around how far each neighbourhood

can be self-sufficient for its shopping and other service needs, without impacting on the town centre and its vitality. Although it is recognised that national planning policy promotes sustainable access to local facilities and services, the primacy of the town centre is also clear and in the case of Basildon, is an important objective. This brings into play the need to deliver a realistic, vibrant role for the town centre and a healthy balance of uses that will help to achieve this objective, accommodating new and evolving requirements and thereby allowing flexibility for future adaptation. The impact of the use of permitted development rights for changes of use of office buildings to residential use has led to a range of economic and social challenges for Basildon and it is recommended that ECC works with BBC to help address these. This issue also indicates a need to increase the range and offer of homes in the town centre, including those to meet wider housing needs and to promote greater local expenditure and is in line with a high intervention approach. In this regard a focused review on the potential impact of COVID-19 and whether any further changes to the nature and form of the of town centre including provision for office and retail space (and their type) may be required to better inform proposals.

Environment and heritage

There are clear opportunities to connect the town's green infrastructure optimising multiuser benefits, improving environmental quality and increasing its attraction to visitors, residents and businesses, plus encouraging investment, employment and the economy. Ensuring sufficient focus on aligning proposals with the Essex Green Infrastructure Strategy would also be beneficial, aid delivery and promote climate resilience. It is considered that ecological interests would also benefit most from a higher intervention approach including a landscape and green infrastructure strategy to shape the requirements in the masterplan. It is recommended that development proposals for the town centre area should include measures to deliver a net biodiversity gain.

It is also recommended that ECC favours an option to develop a town centre specific heritage policy / guidance to protect and enhance the historic new town character and setting of Basildon and further clarification on the approach to the built form.

Delivery, implementation and infrastructure provision

The masterplan will need to be supported by a clear delivery and phasing strategy and one that covers the required infrastructure, its cost, funding and timing, which must be viable and is agreed and is supported by the full range of delivery partners; this includes ECC. This is currently an omission. It is critical that the infrastructure requirements are identified and clearly set out, and the phasing and delivery is supported by proactive monitoring and management. This includes a balance of land uses to create great places for people and businesses; and that the developer funding for the required infrastructure is clearly identified, explicit, and deliverable and does not become a burden on the public purse. In this regard, clarification is required on the approach regarding the role of the public sector to provide or separately secure funds from other bodies / government to implement the necessary infrastructure. In terms of infrastructure provision, consideration will need to be given to the ECC Developers' Guide to Infrastructure Contributions, which among other things covers the requirements for transport and education.

Attention should also be given to ensuring that measures are taken to ensure that the Draft Masterplan is implemented effectively both through the planning system and using wider regulations and influence. This could for example, help deliver improved broadband using new technologies and approaches.

There is also a great opportunity for the public sector partners to work together to change the way services are delivered with mutual benefits such as civic hubs including Basildon Library and provision of Adult Community Learning, or opportunities to utilise the re-development of the town centre for South Essex College to expand their skills offer to include construction and digital technology.

ECC's statutory roles

<u>Transportation.</u> ECC as the Highways & Transportation Authority, note that the content and approach to highways and transportation has not derived from engagement with ECC. The ambition and concepts for sustainable travel, walking, cycling and modal shift are welcomed and supported in principle. Transport evidence is required to understand the impacts of the masterplan proposals on the immediate, local and strategic highway network; covering all factors including car parking assessments, passenger transport assessment and all sustainable modes of transport. ECC as the Highways and Transportation Authority should be engaged in this work and would expect this evidence to inform any changes to the next iteration of the masterplan.

<u>Minerals and Waste Planning</u>. ECC is the MWPA. Consideration will need to be given to the relevant policies in the minerals and waste local plans including the sustainable use of minerals, sustainable construction, minimising waste during construction and waste management.

<u>Flood and Water Management</u>. ECC is the LLFA. ECC welcomes the inclusion of reference to flooding and flood risk management and Sustainable Urban Drainage Systems. The town centre is in two Critical Drainage Area and ECC would expect to be engaged on any development in the town centre to ensure that any development does not increase flood risk. Development will need to comply with the ECC SuDS Guidance and be subject to consultation with ECC as LLFA.

Education. ECC as the Local Education Authority, note there is no consideration of the requirements for additional education provision (including early years and childcare (EYCC), even though a significant uplift of a further additional 2,000 new homes are proposed. This extends beyond the provision that ECC has identified for additional education and childcare provision to service Basildon, within the submitted local plan. In the absence of greater detail regarding the type and size of the additional new homes, now proposed for the town centre, precise pupil product calculations are not possible. It is clear, however, that the education site at "Land west of Gardiners Lane South", which is allocated under policy H5 of the Local Plan, gains additional strategic significance if the Draft Masterplan is to be supported by appropriate infrastructure. This D1 use allocation may be required to accommodate a primary school of up to three forms of entry plus an EYCC facility with at least 56 full time equivalent places. Other projects to expand schools may also be required, although it should be noted that a significant number have already been expanded to meet current demand and there are limited further options.

<u>Early Years and Childcare</u>. It is recommended that ECC seek reference to, and consideration and provision for additional EYCC settings and infrastructure.

<u>Post 16 Education and Skills</u>. It is recommended that ECC seek explicitly recognition of the role of skills in creating successful local economies and the potential to enhance and expand the education and training offer, within the town centre is explored with South Essex College and through higher education.

<u>Customer Services</u>. It is recommended that ECC note the reference to community facilities including the relocation of Basildon Library and that ECC seek to explore options regarding the provision and delivery of public sector services, including the potential to co-locate complementary services such as Adult Community Learning, Library, Careers advice to enhance community engagement, skills and employment.

<u>Public Health</u>. It is recommended that more emphasis is placed on "health and wellbeing" and it is recommended that a Health Impact Assessment is prepared to ensure health and wellbeing is comprehensively considered and integrated into the masterplan's proposals – an area where ECC can advise and assist.

SPECIFIC COMMENTS REFLECTING THE FORMAT OF THE DRAFT MASTERPLAN

The comments below are in addition to the points raised above

ECC Rep no	Draft Basildon Town Centre Master Plan	ECC Specific Comments
1.	Introduction (page 7)	ECC has identified the need for additional evidence and seek engagement on the preparation of the evidence and clarification on timeframes for the outcomes to inform and shape the next iteration of the masterplan.
2.		Clarification is required in respect of the Sustainable Appraisal / Strategic Environmental Assessment procedures to be applied to the new masterplan, following Basildon's Council's statement of intent published on the Local Plan examination website dated 22 June 2020, to incorporate the Draft Masterplan into the Local Plan.
3.	Strategic context (page 8)	There is a need to ensure the town centre's growth potential is supported by evidence to realise and deliver the necessary supporting infrastructure.
4.		ECC notes the following - The Draft Masterplan builds upon the adopted Masterplan from 2012, including principles to reshape the town centre which have and are being implemented including St Martins Quarter's public realm improvements, relocation of the market to enable South Essex College to move into the town centre; permission for the new cinema complex in East Square; as well as recent transport improvements to the bus station and a new surface level crossing from the Rail Station to the town centre replacing the subway, which is currently being infilled.
5.	Town Centre Past and Present.	The references to the original Basildon New Town vision provides a clear foundation to review and update the masterplan and it is important that aspects of these core values are carried forward into the Vision and Guiding Principles, to ensure the new revitalised and regenerated town centre embraces and builds on its unique characteristics. This should include consideration of the historic New Town character and architecture for example Brooke House, a listed building and its prominent place within the town centre, while at the same time ensuring new development responds to today's design requirements.
6.	Guiding (page 14) General and overarching comments	The eight guiding principles are all relevant themes applicable to a town centre vision and masterplan, however as set out, there is an opportunity to focus, better reflect and build upon the unique character of Basildon as a New Town. How these principles are realised within the Strategic Aims and translate into the Proposals and Phasing and Delivery Strategy, and how measurable they will be against any future planning application will be key.

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		Further consideration and evidence is required to demonstrate how the proposals relate to and will deliver the vision, guiding principles and strategic aims. There is a need to ensure supporting infrastructure and services required to create a vibrant and truly inclusive town centre are fully considered, assessed and provided for in the proposals, from the outset. These should be clearly presented within the viability, delivery and phasing plans, to enable and deliver the transformation of the town centre into an inclusive and vibrant place for all, including the neighbouring communities. At this stage there appears to be an emphasis on the vision and the approach to planning applications, however the priority should be on setting a clear strategic framework, with supporting evidence, to clearly define the requirements to better guide and determine planning applications in due course, with the supporting infrastructure to effectively deliver the vision for the town centre.
7.		The status of the content and level of detail presented within the masterplan is mixed. For example, the Phasing and Delivery Strategy recognises the need to engage key bodies, stakeholders and infrastructure delivery partners (including ECC). However, the infrastructure requirements and their delivery should be planned into the proposals from the outset. Following this round of consultation, ECC would expect this to be done in parallel with the refinement of the proposals for the five focus areas. This is necessary to ensure that the proposals are assessed and developed both individually and cumulatively from the outset, to provide a holistic, integrated, informed, costed, viable and deliverable set of proposals. ECC seek further and focused engagement in respect of ECC infrastructure and service provision, including but not limited to schools, early years and childcare, highways and transportation, sustainable travel, waste and recycling, flood and water management, employment and skills, health and adult social care, as incorporated within the Local Plan.
8.	1. Framework for Growth.	At present there appears to be a gap between the aspirations of the Vision and Guiding Principles, and the delivery of the Strategic Aims and the details and requirements within the Proposals for the five focus areas. For example, great emphasis is placed on building heights and number of houses and a market focus, however further detail is required on social inclusivity, including the number size, mix, tenure and provision of affordable housing; and supporting infrastructure and services needed to create a truly inclusive place to live, work and visit. It is recommended that the second bullet is changed to read: "Provide new quality homes, workplaces, and leisure opportunities required for our residents, with the provision of necessary supporting infrastructure and services; and to support our Borough's growth

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9.		The proposed increase in urban capacity within the town centre should be at a scale to secure the necessary infrastructure. The requirements should align with the Local Plan and infrastructure contributions secured through developer funding as part of any new proposals. Given the importance of infrastructure provision, funding (all funding streams) and delivery, this should be considered at the outset as part of the evidence base to inform and shape the masterplan, to ensure the preferred strategy and aims are viable, deliverable and sound.
10.		ECC recommend that a clear baseline of growth and evidence is presented to establish the relationship of the Draft Masterplan with the implementation and delivery of the Adopted Masterplan 2012 and the policies and evidence within the submitted Local Plan 2018.
11.	2. Expand the Role of the Town Centre.	This section should be expanded to recognise the role and importance of digital connectivity to shape the future of the town centre. This should include a commitment for provision of future proofed internet access for all homes and businesses as an embedded requirement for all new and any redevelopment proposals. Consideration should be given to preparing an Integrated Digital Connectivity Plan to support the masterplan, including provision of full fibre to the premises, and where appropriate full 5G mobile connectivity broadband coverage. This would support inward investment, innovative businesses (existing and new) digital public services and community security, including for example intelligent traffic management, sustainable transport, environmental monitoring. This is applicable to Guiding Principles 2, 3 and 4.
12.	3. Encourage High quality Development and Regeneration.	ECC welcome the reference to celebrate the architectural heritage of the New Town movement, which should include the listed buildings, however question how this is being realised within the masterplan's Proposals for the five focus areas, in particular in relation to the massing and building height.
13.	4. Improve Connectivity.	The concepts for a new Transport Hub are welcomed, however ECC need to understand the nature of the growth and the changes to transport infrastructure being proposed. These include an increase in growth, relocation of the Bus Station, and further downgrading of the road network, reduction in parking provision and an increase in active and sustainable travel.
		Transport evidence (including modelling and assessments) will be required to consider masterplan proposals, to identify any impacts on the strategic and local highway network, necessary mitigation measures, costs viability and delivery

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no	Master Plan	mechanisms that should be included within the masterplan's proposals. ECC as the highways and transportation authority should be engaged in this work, to inform any changes to the next iteration of the masterplan. The proposals to increase accessibility and modal shift towards sustainable travel are supported in the Town Centre, and should include consideration of the adjoining neighbourhoods, to integrate with the existing and new networks and connect to employment areas and provide safe and direct walking and cycling routes to education facilities. Consideration should be given to the potential of green infrastructure and green routes as referenced in principle 5. The outcomes of the emerging evidence from the Basildon Local Walking and Cycling Infrastructure Plan (with passenger transport) (LCWIP+) should be taken into account in due course.
		"Improving Connectivity" should be expanded to explicitly include and recognise the role of digital connectivity to expand and transform the Town Centre, with internet access to facilitate the vibrant new town centre economy, support digital development of transport infrastructure and communications.
14.	5. Create New safe Links and spaces.	Recommend the principles are expanded to include protecting and enhancing existing green infrastructure assets; and to further explore the green and blue infrastructure across the masterplan area to maximise and provide an opportunity to improve and contribute to the surrounding parks and green spaces.
15.	6. Creates Welcoming New Town Centre Arrival Points.	ECC welcomes the broad principles, however, additional highways and transportation evidence will be required as set out in principles 1 and 4 above and expanded upon under the Strategic Aims 4 and 5.
16.	7 Diverse and Inclusive.	The Draft Masterplan proposes a significant uplift in housing and growth, and further information and detail is required to understand the nature of this growth, the impact on the surrounding areas and need for infrastructure planning and provision, including the delivery of public sector services.
		This principle should be expanded to include the provision of supporting infrastructure and services arising from the net increase in growth and change in role of the Town Centre. The needs and requirements of the new residents should be considered including integration with neighbouring areas and infrastructure, services and costs for their provision. This should include for example the provision of education, as required by PPG paragraph 94, and policy HC3 of the submitted Basildon Local Plan.
		Specific reference should also made to health and wellbeing to promote healthy and safe communities as required by the NPPF's social objectives and paragraph 91-94. ECC is keen to ensure that the benefits to the wider, social determinants

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		of health that can be influenced by the Masterplan's proposals are optimised and any unintended consequences identified and mitigated against. We would, therefore, encourage BBC to engage with relevant health and wellbeing stakeholders including the Basildon Health and Wellbeing team, Sport England, Mid and South Essex NHS estates partners and social care at ECC to further discuss the draft masterplan. We would also encourage the Council and any applicant to undertake a Health Impact Assessment (HIA) in accordance with policy HC1 of the submitted Local Plan. We would welcome opportunities to be engaged in the scoping of this. It is beneficial that an HIA is carried out at an early stage of the proposal so that issues can be identified and engagement with relevant stakeholders can occur. Methodology, key strategies and priorities, local evidence base and signposting to relevant stakeholders can also be carried out during the scoping phase of the HIA.
		ECC is keen to ensure that the benefits from any development proposed in the masterplan are broadened out to those within the existing community and ensure that community development is included. It is also important that those within the population who are impacted upon by health inequalities are considered and details of groups within the population who are more at risk of unintended consequences of development can be found within the Wales Health Impact Assessment Support Unit 'A Practical Guide'. In addition, the cumulative impact of development within the local area and impact on health and care services should be addressed and we encourage conversations with the relevant stakeholders particularly NHS colleagues.
		ECC promotes the use of Sport England and Public Health England Active Design Principles and would wish to see how these design elements have and will be considered. We will engage with Sport England on any HIA that is produced and would advise that the Sport England Active Design Checklist is part of any assessment that occurs.
17.	8. Promote a Sustainable Approach.	This should be expanded to include reference to flood and water management and the Essex Sustainable Drainage Systems (SuDs) Design Guide and need to engage ECC as the LLFA.
18.		Further consideration should be given to achieve net zero new buildings and potential for carbon storage.
19.	Strategic Aims (page 18) General Comments	The 11 Strategic Aims as presented cover the broad themes as expected in the PPG for masterplans. However, the level of detail, supporting evidence and proposals contained within and between the Strategic Aims varies and this disparity is reflected within the proposals within the strategic aims (and focus areas). It is not fully evident how the proposals have been derived, options considered, assessed, their cumulative and individual impact, mitigation, viability and deliverability.

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		ECC recommends that the Strategic Aims are supported by their own requisite evidence, to provide a clear overarching strategy, to explain and inform how the spatial elements are derived, including the form, function and inter-relationship and delivery of the proposals. For example, for housing provision to be truly inclusive a housing strategy is required to inform and plan for the number, size, type, tenure mix of housing areas required for each proposal area, and how the areas interact with one another, to provide the wide range of housing required in the submitted Local Plan. Without this strategy, there is a risk of only delivering market focus housing and not addressing the wide range of needs in the area, including affordable housing including specialist accommodation.
		Further information, detail and evidence is required to support the strategic aim "Building Heights" to plan for 4,200 new homes, which represents a significant uplift of 2,000 homes and extends beyond the quantum contained in the submitted Local Plan. Clarification is required on how this increase has been derived including environmental assessments and supporting infrastructure requirements, and how they accord with the Local Plan. Further assessment is required of the improvements and capacity arising from recent transport improvements, for example the size and capacity of the bus station.
		ECC wish to work collaboratively with BBC to pro-actively understand the concepts, assess the proposals, identify necessary mitigation required, cost viability and delivery to support the masterplan.
20.		In respect of wider potential environmental impacts, ECC recommends that consideration is given to the potential impact on air quality, having regard to the ongoing joint BBC and ECC evidence base being prepared in response to the Defra Air Quality Direction.
21.	1. Land Use.	The level of detail and information presented within the Draft Masterplan for the respective land uses is variable and further information and supporting evidence should be presented for all themes. to enable full consideration and options appraisal, to inform and shape the preferred spatial strategy and proposals. Baseline evidence is required on the level and quantum of existing town centre provision (housing numbers, retail, office and leisure numbers, floorspace type) and the total now proposed to be delivered. This should be supported by additional evidence including: a housing strategy, building height (typologies, function, mix and form), heritage baseline, broadband, education, training and skills, landscape and green infrastructure (including SuDS) to create multi-functional areas, and provision of both public and private open/green spaces.

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		As stated above, at present the masterplan places an emphasis on the quantum of growth and physical built form, but it is hard to determine the evidence to substantiate the level of proposed growth, its form, and function, and what any additional infrastructure derived from these proposals.
22.	2. Connectivity and Movement.	The ambition and concepts for sustainable travel, walking, cycling and modal shift are welcomed and supported in principle. Transport evidence is required to understand the impacts, of the scale of growth now proposed and the proposed changes to the transport infrastructure, including downgrading of the road network, reduced parking and relocation of the Bus Station. This should be prepared with ECC, including transport modelling for impact on the immediate, local and highways network; a car parking assessment, passenger transport assessment strategy, including consideration of the recent bus station improvements and need to increase capacity to accommodate growth.
		There is also a need to recognise the role of the bus stations as both a destination and a transit hub for commuters to surrounding employment areas.
		Further detail and consideration is required on how the proposals are to be designed, including vehicle parking requirements, access, servicing for deliveries, provision for electric vehicle charging and cycle storage etc
		ECC as the highway and transportation authority would expect this transport evidence to inform and shape any future iteration of the masterplan. The supporting evidence should consider all the factors identified in PPG (Paragraph: 015 Reference ID: 42-015-20140306) including the immediate, local and strategic highway network, and all sustainable modes of transport, including intra-urban movement between the town centre and Basildon and wider area.
23.	3. Public Realm and Open Spaces	To realise the vision of Basildon as a "bicycle town" further transport evidence is required as stated above, including detail the cycles routes, linkages and provision of supporting infrastructure, and regard to the preparation of an LCWIP+. Reference and consideration should be given to the design, location and provision for electric vehicle charging points and cycle storage to inform the function, servicing and access and focal point at the key gateways.
24.	4. Building Heights.	As raised above, further consideration and detail is required on the approach to building height, with regard to the impact on the skyline, typology, form and function and relationship to the existing built heritage including Brooke House a listed building and its setting.
		ECC also recommends development proposals to be in accordance with the <u>Essex Design Guide 2018 (EDG</u>). The EDG has been updated to provide a key planning and design resource to help inform planning in Essex. The EDG retains its

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		original core design principles, but also incorporates reference to revised planning guidance and frameworks, and introduces new themes around Ageing Population, Digital and Smart Technology, Health and Wellbeing, Active Design and Garden Communities.
25.		It is recommended a housing strategy is prepared to set out the housing requirements in total and for each focus area (number, size, mix, tenure etc); and consideration on how different neighbourhoods and land uses will interact and function. As stated in ECC rep 19 above, this should include an analysis of the range of housing provision to provide high quality and truly inclusive new homes, for a wide range of residents with supporting infrastructure.
26.		Clarification is required on the quantity and type of retail, leisure and office space to be provided, with links to the submitted Local Plan and evidence base. It may be necessary to re-consider the requirements in response to the COVID-19 pandemic, and potential impact on how people may need to live, work and shop in the future.
27.		ECC seeks provision of commensurate infrastructure planning in accordance with ECC's Developers' Guide to Infrastructure Contributions, and recommend the masterplan links to the submitted Local Plans policy requirements including policies H1 and H2 (provision of specialist accommodation) HC1 (Health and Wellbeing), HC3 (Education, Skills and Training), T1 – T11 Transport and IMP1 -4 (Implementation).
28.	5. Culture.	ECC recommends a heritage audit is undertaken of all buildings within the study area to establish which, for the purposes of planning, will be considered non-designated heritage assets. This should utilise the Local Heritage List criteria in the submitted Local Plan and an archaeological Desk Based Assessment should be undertaken to identify areas of higher potential for below ground archaeological remains in order that they can be preserved in situ or by recording.
29.	6. Biodiversity and Net Gain and Greenery.	A review of the approach and terminology for the provision of green infrastructure, landscape and greenery is recommended for consistency.
		The preparation of a Green Infrastructure Strategy could set out how these networks (including green/open spaces and parklets) could be incorporated into the proposals, with multi-user benefits including, SUDs and green routes of walking and cycling. This would clarify the role and potential for a network of green / blue infrastructure within and adjoining the town centre. It may be necessary to reconsider the amount of public and private green and open space provision, given their importance for residents in the current COVID-19 pandemic.
		The Essex Green Infrastructure Strategy (2020) was approved by ECC in March 2020; and sets out a positive approach to the delivery of green infrastructure in Greater Essex. It aims to enhance the urban and rural environment, through

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		creating better connected, multi-functional green infrastructure that delivers multiple benefits to people and wildlife. The strategy provides an understanding of and the opportunities to improve the quality and value of our green infrastructure. It identifies a clear vison and associated principles that will inform and contribute to a range of national, regional and local goals and objectives. It outlines an approach that requires a change to the way we think about and value our green and blue infrastructure. A carefully planned green infrastructure network is crucial for the environment, our health and well-being and will help support a thriving, sustainable economy. Further guidance is available within the Essex SuDS Design Guide and regard to the EDG principles.
30.	7. Local Economy.	ECC supports the ambition and shift to a multi-user centre, recognising the importance of evening and night-time economy, strong linkages between cultural and other uses, increase in intensity of land use, balance of greenery and events facilities in key public spaces. This should be expanded to explicitly consider the role of the Town Centre in delivering the boroughs own Economic Development Policy (2017) and the submitted Local Plan policies for the provision of office space. Further explicit reference to and provision for smart technologies to increase the potential productivity of private sector and the need for Grow on Space to address market failings. Consideration should be given to the preparation of an Integrated Digital Connectivity Plan to future proof internet access,
		including provision of full fibre network and 5G provision in all new developments. ECC recommends that explicit reference is made to appropriate technical evidence used to shape and inform the proposals, including for example: submitted Local Plan Grow on Space Study 2016; South Essex Grow on Space 2019, BBC Economic Development Policy Topic Paper and consideration of the ASELA Productivity Plan 2019.
		The role of skills in creating successful local economies should be recognised, including their potential to enhance and expand the education and training provision within the Town Centre to increase visibility of career pathways, address the local shortfall in qualifications, and respond to future housing and economic growth.
		Consideration should be given to the potential impact of COVID-19 and whether any further changes to the nature and form of the town centre including provision for office space and retail may be required.
31.	8. Deliverability	As stated above, for further information and evidence is needed to identify the respective costs, viability, phasing (dependencies, timing and funding streams) and deliverability of the masterplan proposals. The provision of infrastructure

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		requirements is critical, to shape and inform the next iteration of the draft Masterplan, and ECC wish to be engaged on this matter.
32.		Further information is required to understand the phasing, delivery and implementation of the masterplan; to provide the detail and framework for growth, including links to the Local Plan. Viability should be expanded to proactively monitor and manage requirements, including the approach to market value and land value capture.
33.		3 rd and 5 th Bullets – further clarification and change is required to the approach, concerning and the role of public sector to provide or separately secure funds from other bodies / government to implement the necessary infrastructure. Greater emphasis should be placed on the developer contributions to deliver the Masterplan in the first instance, however recognising some elements may require external funding. Viability and deliverability are key to implementing a Town Centre regeneration and ECC would anticipate infrastructure requirements to meet ECC's Developers' Guide to Infrastructure Contributions.
34.		The masterplan provides a unique opportunity for the public sector partners to work together to change the way services are delivered with mutual benefits such as civic hubs. Consideration should be given to management and maintenance regimes, including transport and flood/water management and green infrastructure
35.	9. Inclusivity.	This section is welcomed, however greater emphasis should be placed on health and wellbeing of the residents living within the town centre and their needs as a community, to create truly inclusive place to live. This is necessary to ensure promotion of healthy and safe communities including Health, Education training and skills; and the provision of specialist accommodation including older people, as set out in Submitted Local Plan policies HC1, HC3, HC4 and H2
36.		ECC as the lead Public Health advisor recommend a HIA is prepared to evidence how the health determinants within Basildon are being addressed through the Masterplan, in accordance with policy HC1 of Local Plan (see Principle 7 above).
37.		4 th Bullet - The need for and provision of community facilities is supported, however the term should be defined and expanded to explicitly include education (including EYCC) as required by policy HC3 of the submitted Local Plan. The reason for the omission is not clear, and it is of concern that the Appendix 2 "Draft Planning Policy Context" omits policy

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	macro: r min	HC3 and incorrectly concludes there is sufficient education and EYCC capacity within the vicinity (see comments on Appendix 2).
		To clarify the position, in support of the Local Plan, ECC as the Local Education Authority have identified a need for additional education and childcare provision to serve Basildon. The evidence considered did not include the level of housing that is indicated for the town centre as part of this masterplan consultation. In the absence of greater detail regarding the type and size of the additional new homes, now proposed for the town centre, precise pupil product calculations are not possible. It is clear, however, that the education site at Land west of Gardiners Lane South, which is allocated under policy H5 of the submitted Local Plan, gains additional strategic significance if the masterplan is to be supported by appropriate infrastructure. This 'D1 use' allocation may be required to accommodate a primary school of up to three forms of entry plus an EYCC facility with at least 56 whole time equivalent places. Other projects to expand schools may also be required, although it should be noted that a significant number have already been expanded to meet current demand and there are limited further options.
		Change the 4 th bullet to read: "Providing for a range of community facilities and services such as an accessible library, health services, Education (including Early Years and Childcare); and community spaces"
38.		4 th Bullet – ECC notes the reference to Basildon Library and ECC wish to work with BBC to explore the potential for ECC to co-locate complementary services such as Adult Community Learning, Library, and careers advice to enhance community engagement, skills and employment.
39.		6 th Bullet - It is recommended that a housing strategy is prepared to set out the overall housing provision by number, size, mix and tenure, for the reasons set out in ECC reps 19 and 25.
		ECC welcome the references to provision for older people and sheltered housing, this should be expanded to include a commitment to work with ECC to bring forward the provision of an Extra Care scheme within the town centre.
40.		Expand the "Further Guidance" to include the "Essex Health and Wellbeing Strategy", ECC's Developers' Guide to Infrastructure Contributions and the Essex Design Guide.
41.	10. Design Quality.	ECC welcome the ambition and reference to design, however further information and evidence is required on the form, function and delivery, to implement the masterplan's Vision and Guiding Principles.

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		ECC seek clarification on how the indicative proposals within the five focus areas respond to the strategic aim for Design Quality; and details of the design standards to be proposed. A strategy could be prepared, to shape the proposals and requirements in accordance with the <u>EDG</u> .
42.		The aims should be expanded to recognise the need for adaptability and flexible use of land and property, this is considered a key factor for success of place making in the long term and should be supported by clear evidence and strategy.
43.		The initiatives for green infrastructure to create a "greener town centre" are welcomed, however further information and emphasis is required on the provision of better connected multi-functional green infrastructure throughout the town centre to deliver multiple benefits to people and wildlife, including climate resilience, as set out in the Essex Green Infrastructure Strategy 2020 .
		ECC recommends that a landscape and green infrastructure strategy is prepared to clarify the requirements for the provision of Green Infrastructure and to provide a framework for the proposals to realise the principles and aims for the provision of green infrastructure. This could include landscape, green links, open / green space, multi–functional and multi-user benefits with provision of SuDS, public realm, open space, active and sustainable travel, ecology and net biodiversity gains.
		Moving forward, consideration could be given to using the Building with Nature framework (BwN) as a measure of Green Infrastructure quality, and accreditation could be sought after where appropriate.
44.		The reference to SuDS, is welcomed and should be amended to refer to the Essex SuDS Design Guide.
45.	11. <u>Sustainability and</u> Response to Climate Change.	The proposals within the five focus areas should provide more detail on how the aims under this heading are to be applied and realised.
46.		ECC recommends that the masterplan should aim for net zero new buildings and include projects to include sustainable energy and waste recycling infrastructure. The energy needs of new developments should be covered by onsite renewable energy generation. Consideration should be given to conserving and re-purposing historic buildings to store carbon.
47.		ECC as LLFA, welcome the reference to SuDS; the town centre is within the following two Critical Drainage Areas: • NBas_020 - Kingswood

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		NBas_021 – Lee Chapel South Proposals as a whole and in the five focus areas will need to accord with the requirements of the Essex SuDS Design Guide (and regard to the EDG). This should be designed into the detailed requirements of the masterplan proposals and ECC would expect to be engaged in this matter.
48.		The transport proposals are welcomed, however more detail is required on the concepts.
		In respect of electric vehicles, provision should be made for charging points to be incorporated in the masterplan at ground level, into car parks (at ground level) and promote electric vehicle provision at taxi ranks and provision within bus depots. Consideration could be given to working with public transport providers to promote the use of electric buses operating in the town centre. The transport hub could be expanded to be an active travel / cycle hub, including the provision of e-bikes, and e-scoters.
49.	PROPOSALS (page 29) General Comments	In respect of the change to the role and function of the town centre, clarification is required on the likely change on the intra-urban relationship and the wider area, in recognition of the increase in growth proposed, beyond the Local Plan.
		For example, there is an emphasis placed on proximity to London to encourage commuters, however consideration should be given to the relationship with the neighbouring existing communities as well; including employment, education and skills, and housing, as well as impacts on existing infrastructure and services such as schools and highway network. Consideration could be given to other plans and programmes such as the BBC/ECC joint National Infrastructure Commission, Intra-Urban Infrastructure study.
50.		Further clarification is required on the inter-relationship of all proposals and re-assessment for delivery against the vision, guiding principles and strategic aims. This is necessary to ensure the new totally transformed town centre is integrated, pro-actively planned for, viable, deliverable and truly inclusive for new and existing residents within and adjoining the town centre.
51.		The status of evidence is unclear. The proposals should be informed by the additional evidence requirements set out above in response to the Guiding Principles and Strategic aims, including for example Highways and Transportation and education. Greater clarity is required on the transport proposals referenced and how they will be incorporated and delivered within the masterplan proposals.

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		For example, it is recognised that a car parking assessment / study has been commissioned. ECC wish to be engaged in the project and would expect the outcomes to inform the next iteration of the masterplan.
		These and other additional infrastructure evidence identified by ECC should be completed to inform the next iteration of the masterplan to ensure it is based upon sound evidence, and to clarify the form, function and infrastructure requirements to be provided. This will take time and should be factored into the preparation of the masterplan and next steps.
52.		The provision of new cycle routes connecting to and through the town centre are proposed and appropriate cycle storage will be required at the gateways for people to use when visiting this end of town.
		A number of proposals for the provision structures and cycle storage on highway land and ECC would need to be engaged on this matter.
53.		As stated above, the Proposals as a whole and in the five focus areas will need to accord with the requirements of the Essex SuDS Design Guide 2020 (and should have regard to the EDG). This should be designed into the detailed requirements of the masterplan proposals and ECC would expect to be engaged in this matter.
54.	St Martins Quarter & Westgate.	ECC wish to work with BBC to explore the potential community space within the town centre including the relocation of Basildon library, and potential to community space with other complementary ECC services such as Adult Community Learning, Careers Advice and skills offer to create a learning shop to enhance community engagement, skills, employment and career opportunities.
55.		The re-design of the public realm and open space provides an opportunity to incorporate multi-purpose green designs and should be expanded to include SuDS and green infrastructure, for example: http://www.urbanisten.nl/wp/?portfolio=waterplein-benthemplein
56.		Further Highways and Transportation evidence and detail is required, including the relationship and safety of combined pedestrian areas and cycling routes, and assessment of the reduction in car parking, a new crossing location proposed on Roundacre and the potential to upgrade the existing walking and cycling link within the roundabout.
57.		Consideration should be given to walking and cycling routes and links to surrounding areas and opportunities to develop these with the green infrastructure to create multifunctional spaces and links.

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58.	Town Square and East Square.	This area provides an opportunity to focus on boutique / independent retail and/or a food market hall (temporary or permanent). Further consideration should be given to heritage buildings,
59.	Station Environs.	Clarification is required on the proposed quantity of retail and officer floorspace when compared with Eastgate. Are the figures correct? It would appear there is double counting.
60.		There are opportunities to enhance and expand the training and skills offer at South Essex College and these should be explored further including those related to construction and digital connectivity.
61.		Transport - Further detail and evidence is required to understand the transport hub proposals and changes to the road network within the town centre, including transport modelling and assessments, and alternative options may need to be considered. ECC will need to be engaged with preparation of the transport evidence and mitigation required. Bus station - The proposed relocated bus station appears to be a reduction in size and capacity, however there will be an increase in growth and demand. A passenger transport study will be required, recognising recent improvements, any need to relocate, future proposals for growth and function as a transit hub for onward connection to employment areas, education and health facilities. Liaison with the bus operators and the ECC Integrated Passenger Transport Unit would need to be undertaken to consider impacts. Across the town centre, attention should be given to deliveries, site access, emergency access, rail station emergency situations and overall safety.
62.		Taxi rank – the relocation appears to include a reduction in taxi rank provision, and a transport assessment including capacity and impact on the road network is recommended. Liaison with the Hackney Carriage / Taxi Association and ECC would need to be undertaken to consider the impacts. A capacity reduction could have implications especially for customers experiencing mobility impairment. Transport and parking assessments will be required for the proposed reduction in parking, and this will need to include impact on congestion, circulation and capacity.
63.		The concept of a Transport Hub provides an opportunity promote active and sustainable travel through the provision of a cycle hub. This provides an opportunity for the provision of ground floor land use in the station area should include cycle storage and the possibility for land use for docked bike and docked e-scooter provision. Please refer to mobile hub that

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		SEAT for further details. Proposals could include bike and e-scooter hire points to enable people coming into Basildon to travel the last mile of their journey by sustainable modes. An increase in cycle storage should be considered.
64.		Green infrastructure features are a useful way to form clear and attractive entrances and gateways, and maintain and inject distinctive features, landmarks and routes into a place to make it more welcoming. There is an opportunity to include these features within the design to improve and create a focus for this gateway to the Town Centre.
65.	Eastgate.	Further Highways and Transportation evidence will be required, in respect of proposed growth and changes to infrastructure; including modelling and assessments of the proposal to downgrade Southernhay to single way and removal of the roundabout to understand the implications and changes to vehicle movements on Town Centre network.
		The relocation of passenger transport with require liaison with the bus operators and ECC. An assessment of the impacts and opportunities will be required and this should include reference to the Road Passenger Transport Strategy.
		Clarification is required on green infrastructure provision, including a change in terminology, as well as on the connectivity of the green routes/ green corridors and green links for the town centre and surrounding area as a whole, as promoted under the strategic aims promote
		Biodiversity Net Gain and Greenery - There is also a need to demonstrate how the green infrastructure feature contribute and connect to the wider landscape scale, for the whole town centre and surrounding areas.
66.	Great Oaks.	Further Highways and Transportation evidence will be required including consideration on the proposed approach, an assessment of the need for residential car parking and its impact on the road network around the town centre. Whilst it is acknowledged that a car parking assessment/strategy assessment is to be undertaken, further work needs to consider sustainable transport provision tied into the new development.
		Full transport and modelling assessment will be required to understand the implications of the proposals to downgrade Great Oaks to a single lane in either direction and remodelling the Linkway and Southernhay gyratory system to two-way system.
		Further consideration is needed on the range of neighbouring uses, and level of transport access to the strategic road network, required for the emergency services.

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67.	PHASING AND DELIVERY (Page 63) Delivery Strategy (page 63)	The reference to ECC as a key infrastructure provider and the importance placed on infrastructure delivery and phasing to implement the masterplan is welcomed, however should be expanded to reflect the full role of ECC as a provider and commissioner of services and infrastructure.
		ECC would anticipate being engaged by Basildon Borough Council in identifying the necessary supporting infrastructure requirements for the proposed levels of growth and for these to be incorporated within the masterplan proposals; with details on how and when the infrastructure would be delivered.
		Infrastructure is critical to support sustainable growth and it will be critical to make sure that the right infrastructure is in the right place at the right time, to accommodate the new jobs and homes needed in the future, and the proposed increase in urban capacity within the town centre should be at a scale to secure the necessary infrastructure. The requirements should align with the submitted Local Plan and ECC Developers Guide to Infrastructure Contributions, with provision secured through developer funding as part of any new proposals, to ensure the new Masterplan is both viable and deliverable.
		Given the importance of infrastructure provision, funding (all funding streams) and delivery should be considered at the outset as part of the evidence base to inform and shape the Masterplan, to ensure the preferred strategy is viable, deliverable and sound.
68.		The phasing and delivery timeframes should be amended to include the preparation of the additional evidence required; as well as timeframes to implement and deliver necessary infrastructure, especially Transport.
69.		Further consideration is required in the phasing plans and delivery strategy including the inter-relationship of sites, for example where sites in the long-term phase could isolate the short-term phases, raising a potential disconnect of developments and a lack of necessary infrastructure from the outset. For example, plots SM5 and SM6 are indicated as short-term developments and abut plots SM7 and SM8 which are long term developments. Clarification is required on the assurances that the masterplan would provide to help deliver connected development parcels.
70.		Each focus area has its own significant deliverability implications issues for their area and masterplan as a whole which have been omitted under the respective focus areas, and further consideration should be given to the deliverability issues for each focus area and collectively to ensure an integrated approach to viability, phasing and delivery

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71.		ECC recommend that an Infrastructure Delivery Plan is prepared, to identify and evidence the infrastructure costs, viability, funding (developer contributions) required to ensure the preferred strategy is viable, deliverable and sound.
72.	Potential Delivery and Structures And delivery and phasing consideration (Page 64)	The section should be amended to recognise the need to proactively monitor and manage viability. The requirements should be expanded explicitly include proactive monitoring and management of viability and land value capture. This should include existing uses, raising demand, land values through place making interventions, clearly identifying infrastructure requirements, encouraging early delivery of phases that have catalytic impacts whilst delaying phases that would provide inadequate developer contributions (e.g. taller buildings), ensuring comprehensive development that cross-subsidies from viable to non-viable uses, public sector scrutiny of developer financial viability assessments. ECC wish to be engaged by Basildon Borough Council to identify the necessary infrastructure requirements, moving forward and for this evidence to inform and shape the next iteration of the masterplan to ensure that they are viable, deliverable and phased to align with infrastructure requirements. This should cover ECC's role and function as a statutory infrastructure provider, and explore delivery mechanisms.
73.	St Martin's Quarter and Westgate Area (Pages 65)	 The following will also have significant deliverability implications for this quarter / wider masterplan for this quarter and therefore require careful consideration, but are not mentioned: Difference in residential values within and without the ring road Demand and values for flats in this location Potential for land value capture from relatively low existing use values from surface car parking and single-storey non-residential uses in a secondary location, versus potentially relatively high land values for medium-rise housing Impacts on retail and leisure provision of demolishing large units / complexes – temporary and permanent
74.	Delivery strategy for Town Square and East Square (Page 66)	 The following will also have significant deliverability implications for this quarter / wider masterplan and therefore require careful consideration, but are not mentioned: Impact of Great Oaks car park on residential amenity and values Relatively high existing use values (coupled with higher costs for taller buildings and complexities of construction already mentioned). Given the importance associated with Town Square North and the deliverability challenges above, this seems to be one of the top priorities for public sector intervention including securing regeneration funding (alongside the public transport interchange).

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75.	Station Environs (Page 66)	 The following will also have significant deliverability implications for this quarter / wider masterplan and therefore require careful consideration, but are not mentioned: High existing use values (including occupied residential units) and complexities of construction, with relatively low densities of housing Challenges to be overcome for locating residential uses over a large non-residential centre (funding, maintenance, servicing, depreciation / redevelopment, etc.).
76.	Eastgate (p67)	The following will also have significant deliverability implications for this quarter / wider masterplan and therefore require careful consideration, but are not mentioned: • High existing use values (including occupied residential units) and complexities of construction, with relatively low densities of housing • Challenges to be overcome for locating residential uses over a large non-residential centre (funding, maintenance, servicing, depreciation / redevelopment, etc.).
77.	Great Oaks (p.67)	The following will also have significant deliverability implications for this quarter / wider masterplan and therefore require careful consideration, but are not mentioned: • Residential demand and values along dual carriageways, and costs of the proposed revised road layout (including mitigation) • The requirements for provision of alternative locations for the Ambulance and Fire stations.
78.		Given the disparate land ownership at Great Oaks, consideration should be given to the importance of land assembly to ensure that the masterplan objectives are delivered in a comprehensive way.
79.	APPENDICES General	It is recommended that this Appendices are reviewed and amended, and ECC wish to work with Basildon Borough Council to address the omissions which include the following:
80.	1.Draft Urban Appraisal April 2020	The content is noted, to inform the initial scope and principles of the masterplan building upon the adopted Masterplan, however there is no baseline of exiting capacity and infrastructure, or considerations of improvements to date. Furthermore, it is not clear how the findings in this report have informed the proposals within the draft Masterplan, especially in relation to building height, form and the historic environment.
81.		ECC recommends that an up to date Heritage Assessment for the Town Centre to assist in fully exploring its heritage values. A heritage baseline would sit alongside, rather than form a part of, this Urban Appraisal.

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82 .	Master Plan 2. Draft Planning Policy Context November 2019	There are a number of errors and omissions within the review of planning policy and guidance, including missing Local Plan policies (specialist accommodation, health impact assessments, education and skills, transport; monitoring, implementation and delivery policies). In addition, explicit reference should be made to ECC policies and guidance, such as the Essex Developers Guide to Infrastructure Contributions, the adopted Minerals and Waste Local Plans, Essex SuDS Guide and transport guides, and Education Guides, role of Waste Disposal Authority, Essex Green Infrastructure Strategy, and Essex Planning Officers Associations guidance as recognised in the submitted local plan.
83.	Regional Planning Policy	In respect of ECC, the following polices, and guidance are relevant and should be considered and referenced within the masterplan; and have informed the preparation of the submitted Local Plan. Highways and Transportation In addition to the reference to the Essex Transport Strategy, the Local Transport Plan for Essex (June 2011); the following documents and strategies should be applied: • A127 Corridor for Growth - An Economic Plan 2014 (A127 Route Management Strategy) • A127 Air Quality Management Plan - (Strategic Outline Case) March 2018 • ECC Sustainable Modes of Travel Strategy (January 2019) • Essex Cycling Strategy November 2016 Minerals and Waste Planning • Essex Minerals Local Plan 2014 • Essex and Southend-on-Sea Waste Local Plan 2017 Health, Education, and Infrastructure Planning • Joint Essex Health and Wellbeing Strategy 2018 (2018-2022) • School Organisation 10 year plan for Essex school places 2020-2029 (PDF, 4.64MB) • Local and Neighbourhood Planners' Guide to School Organisation (PDF, 160KB) • Joint Municipal Waste Management Strategy for Essex (2007 - 2032) • ECC Sustainable Urban Drainage Design Guide 2016 (SuDS) • ECC Developers' Guide to Infrastructure Contributions (2016)

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	Master Flam	Please note that ECC's Developers' Guide to Infrastructure Contributions is currently under review following public consultation in 2019/20, a new Guide is due to be published in July 2020. The following guidance prepared by the Essex Planning Officers Association and other joint partnerships are applicable: Essex Design Guide 2018 Essex Local Viability Protocol (2018) Essex Green Infrastructure Strategy (2020)
84.	Basildon Local Plan Policy Review	Basildon Borough Revised Publication Local Plan 2018 A full review and cross reference of the Local Plan policies should be undertaken, having regard to the proposed increase in scale of growth and changes proposed. This should include policies H2, HC1 and HC3; as well as the implementation policies for example.
85.	Additional Evidence Infrastructure Delivery Plan (IDP) (2018)	ECC recognise that the IDP is a living document, and ECC are working with BBC on a revised IDP. It is noted with concern that the review of the Infrastructure Delivery Plan includes an out of date and incorrect assessment of education the need for the Town Centre. ECC as the Local Education Authority is the responsible body for school planning and should be engaged in the assessment of future need for pupil places and EYCC settings. It is noted that BBC are separately engaging ECC in respect of draft revised IDP; and it is recommended that this section of the "Planning Policy Context" is reviewed and updated to reflect the emerging revised IDP. Accordingly. This should include - Highways and Transportation - Amend to include findings and evidence prepared in support of the submitted Local Plan, as well as the additional joint transport work prepared by BBC and ECC in respect of Air Quality. Regard should be had to the Local Walking and Cycling Infrastructure Plan (with Passenger Transport) – once completed - Education – Amend and update for the reasons set out in ECC Rep 37 above. ECC is the Local Education Authority and responsible to consider and plan for the additional school pupil places and EYCC settings arising from planned growth. ECC should be engaged to identify and plan for the extent of additional provision required to accommodate the increase in housing proposed in the masterplan. – see policy HC3. - Health – Amend to include Health and Wellbeing – see policy HC1 above and health profile for Basildon Borough. ECC as Public Health Advisor can assist - Superfast Broadband – Welcome the reference to Superfast Essex – however further engagement with ECC is required to realise the opportunities through the Masterplan

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		- Waste – Omission – should include a reference to the role of ECC as the Waste Disposal Authority
86.	Appendix 3 Property Market Drivers	This evidence is welcomed, however further evidence is required to provide the necessary balance of the wider environmental, social and infrastructure impacts and opportunities.
87.	Appendix 4. What we Learnt from Local Engagement	Welcome the engagement with local community, however there is now a need to undertake this engagement actively and constructively, and preferably under the legal duty to co-operate, with ECC as a key partner, and infrastructure and service provider. This should be through formal engagement within a structured programme of work, to address the matters raised by ECC in response to this consultation.