



Local Plan Consultation Response – Part One
OAN, Housing Targets and Commuter Infrastructure
23rd March 2016

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1. Introduction and Aims

This document is the first part of Billericay Action Group's (BAG) response to the Local Plan consultation and focuses on the very large Objectively Assessed Need (OAN)\Housing Target which seeks large scale addition to the borough's current 74,000 homes.

The paper also goes on to look at the problems and limited extra potential of the commuter links to London, on which the borough's economy depends.

A second paper will be Billericay specific and look at the proposed developments on current Green Belt land there, and local road constraints and proposals within the town.

It is hoped that the evidence of both, together with evidence of other local groups and individuals will combine to convince Basildon Borough Council (BBC) to produce a sub-OAN Housing Target.

1.1. Some background

In early 2014 BBC consulted on a draft Local Plan which included an OAN of 16,000 which it intended to meet in full.

The case for that OAN was developed in a 'Housing Growth Topic Paper' by Turley Associates, however this was at odds with the concurrent TGSE area SHMA produced by the consultants ORS which proposed 11,900 and criticised the circular logic in the 'Economic Scenarios' Turley & BBC used to justify the very high rate of growth. It argued that these scenarios were flawed in that they used housing targets as both an input **and** an output.

Now Turley have been commissioned to produce a new TGSE SHMA, a draft excerpt of which is the basis of the new OAN of 15,260 – or to be more precise, between 15,260 and 16,740, with a mid-point of 16,000. This time different arguments were developed to reach the same conclusion.

1.2. There is no perfect number

There is no perfect Housing Target, every potential number has its pros and cons and readers will have their own views on how to prioritise and balance these considerations.

The Housing Target is the most important part of any Plan, but it should be noted that the type of housing (affordability, size etc) is nearly as important, especially when considering the needs of local people.

1.3. Aims

The aim of this Paper is to show how the OAN was developed and show how the structure of the Draft Plan means that the eventual number of houses built in the borough and on its boundary could be very much higher (see **Error! Bookmark not defined.**).

The document will show that Basildon Borough Council (BBC) need not build as many houses and will go on to argue why development on this scale would be bad for Basildon borough's social and economic wellbeing – as well as the economic wellbeing of our neighbours – and as a consequence should not go ahead.

2. Basildon's Obligations

As part of the Local Plan process, local authorities must develop an OAN and a Housing Target. These figures need not be the same.

It's important to make two things clear:

- It is the Local Authority that is responsible for setting these figures, provided that the figures are evidence based and compliant with national policy (the NPPF and its associated Planning Practice Guidance – PPG)
- There is no obligation for authorities fortunate enough to possess Green Belt to de-designate any of that land.

Extensive evidence that this is the case is included in Appendix A: Green Belt Protection. It shouldn't be necessary to push this point so hard, but unfortunately Question Five of the Council's consultation response form not only falsely implies that the numbers represent local need but worse still wrongly states that these must be met.

"The number of people living in the borough is projected to increase by 14%¹ by 2034. The Council has a legal obligation to meet this housing need..."

2.1. Four tests of soundness (NPPF para 182)

As well as satisfying specific policies, a Plan must meet more general criteria:

"...a local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the (National Planning Policy) Framework."

NPPF para 182

We note these points, as our conclusion will argue that the current draft Plan fails or falls short in three of these four areas.

¹ BAG understands that BBC Planning Officers have conceded that, based on meeting the minimum OAN, that this figure is erroneous.

2.2. Develop an OAN

It is sometimes understandably assumed that 'Objectively Assessed Need' is a measure of local need, or alternatively of demand, but neither is the case.

One reason for this is simply that it's not possible to quantify demand; rather like road building schemes, house building will increase demand as well as help meet it. If Basildon built a further 74,000 homes it would not satisfy demand as people from other areas would come here to fill them (of course building zero homes would be equally unsatisfactory).

Instead the NPPF describes how an OAN must take account of migration and this is usually taken to mean that past rates of migration to an area are extrapolated into the future.

This makes the term 'Objectively Assessed Need' a misnomer as it must go beyond the needs of local people. This is unfortunate as it distorts the sort of local debate that was the intention of the reforms brought in under the Localism Act of 2011.

Basildon's local needs (aka Natural Growth) is in the region of 9600², however the OAN must go further (though it needn't be met).

The starting point for any OAN is the most recent DCLG released household projections for an area, and this calculation extrapolates past migration into the future to give a figure of 13,200.

Councils have considerable leeway however, and the Essex Planning Officers Association commissioned a range of projections to support Plan making in Essex and surrounding areas. These demographic forecasts included a range of alternative migration based forecasts which include more locally relevant data and assumptions.

These projections suggest a generally lower requirement ranging from 11,200 to 13,500, and one such projection was the basis of the **still current** TGSE SHMA (Dec 2013 - the Plan is based on a draft excerpt) recommendation of 11,900 homes.

So, as described, based on these demographic/migration based projections, an orthodox OAN would be in the region of 11,200 – 13,500 but the authority would have discretion to adjust that up or down if it has appropriate arguments.

Outside of Green Belt areas, developing an orthodox OAN and meeting it is arguably the 'default' approach to Plan Making.

Brentwood takes an orthodox approach and we believe that most or all of the remainder of the authorities in the TGSE Housing Market Area will be seen to do the same when the full draft of the SHMA is published.

² The Greater Essex Demographic Forecasts Phase 7 gives two varying figures for Natural Growth – 8,600 and 10,600. Neither is perfect but both are robust. BAG prefers to use the mid-point (or blended) figure of 9600. The Local Plan refers to 11,000 which may mean BBC take the higher figure and round it up.

One of the great disappointments of Basildon using an excerpt of the as yet unseen draft new SHMA is that we are not able to compare the approach taken to Basildon's OAN with those of its neighbours.

2.3. Consider constraints

An authority is usually expected to plan to meet its OAN unless constraints such as Green Belt, transport or environmental designations (such as Areas of Outstanding Natural Beauty or National Parks) are used as constraints.

The NPPF\PPG describes how land can only be removed from Green Belt as part of the Local Plan making process, and only with 'exceptional circumstances'. Meeting an OAN does not qualify as 'exceptional circumstances' (See Appendix A: Green Belt Protection for details).

What are the exceptional circumstances in this Local Plan?

Basildon could build approximately 8,000 homes without building on Green Belt and this is therefore probably the minimum number that could be built. Based on the NPPF\PPG (see Appendix B) constraining the Housing Target to this level is the default, though confusion arising from the introduction of the new NPPF (which has arguably strengthened Green Belt protection) has seen theory and practice diverge, for the time being at least.

This 8000 comprises:

- Around 6500-7000 non Green Belt sites identified in the HELAA.
 - This figure could be increased by a more rigorous policy on density which would tend to deliver the one and two bedroom houses which have been identified as being the most needed. High density also correlates to smaller plots and hence cheaper homes.
 - This figure could be reduced by removing non-Green Belt green spaces from the Plan.
- A Windfall Allowance.
The Plan should include a Windfall Allowance (see 5) which we believe should be in the 1-2000 range, perhaps higher.

BBC therefore have discretion to draft a Plan to build from 8000 upwards.

As noted, the Greater Essex Demographic Forecasts shows that Local Needs – that is the needs of Basildon residents and their children to be around 9600.

If Basildon chose to meet this need it would probably need to remove some land from Green Belt. This is lower than any feasible OAN so Green Belt would still be used as a constraint, but the Council would be **choosing** to release some GB land.

This document will go on to present evidence that the overstretched commuter routes to London should be used as another constraint to meeting the proposed OAN.

If an orthodox OAN is 11,200-13,500, how do we get to this OAN of a minimum of 15260?

3. Basildon's Chosen OAN

3.1. Stated Plan objectives

Central to the Plan is the Vision – every element of the plan should help meet, or at least be compatible with that Vision.

“By 2034, we want to accelerate Basildon Borough’s ambition. **We want a more prosperous economy providing employment for all our residents**, including higher value jobs.

We need more housing and a better range of housing. We want to protect our natural environment, including open space. The Borough will feel safe and will have a high quality of health and wellbeing. We want an improved cultural offer, more vibrant town centres and higher educational attainment and aspirations. We also want more resilient communities, reflecting the diversity within the Borough.”

Local Plan Vision (section 5.1)

To help meet that vision several Policies have been created including those below –

We will work towards breaking the trend of structural under employment and youth unemployment in the Borough - this looks to address the labour market and skills, particularly among the Borough's young people who are more vulnerable to changes within the labour market. This looks to address the skills mismatch between what employers need and the qualifications of local residents.

Section 7.6 of the Plan. Policy Statement 1

We will provide evidence that the approach taken to the OAN works against the achievement of these laudable aims.

3.2. Recap: Orthodox OAN

As described the starting point for any OAN is the most recent household projections released by the DCLG for the area – in Basildon’s case this is **13,200** homes.

An orthodox approach sees Local Authorities consider this alongside other more locally relevant migration\demographic projections, calculated in a variety of ways and in Basildon’s case this gives a very wide range of **11,200 – 13,500**.

Authorities can then use sensible arguments based on local circumstances to adjust these numbers up or down.

3.3. An overview of Basildon’s OAN – and some background

Basildon’s OAN takes a different, though not unique, approach which can be paraphrased as a **policy** of accelerating migration from London with the argument that such population growth is necessary to support businesses by making a larger supply of labour available to them.

The OAN is discussed and presented in a draft excerpt of the Strategic Housing Market Analysis (SHMA) for the TGSE area. This draft will be entirely replaced when the full SHMA is released in the spring of 2016.

Freedom of Information Request

BAG have been puzzled by the undeclared policy of accelerated growth and keen to gain insights into the origin and motivation of this policy.

If 15,260 was the answer, what was the question?

To this end we submitted a Freedom of Information request asking to see the Terms of Reference for the latest SHMA. BBC refused to provide it, declaring that while they do have the document they would exercise their right to withhold it on the basis that the SHMA has yet to be published.

This is dubious, the draft SHMA has been released and is shaping the future of the borough. To withhold it is undemocratic and goes against the spirit of Localism, which is intended to be at the heart of the recently reformed planning processes.

We note that West Surrey freely release the TOR for their SHMA alongside the output document itself.

It has been difficult to critically analyse the SHMA document as being a short-term draft it is not written with anything like the same clarity as Turley's comparable Housing Growth Topic Paper in 2014.

There is a noted lack of clarity around some of the economic forecasts included and also around divergences between figures quoted in the draft SHMA and source data – phase seven of the EPOA Demographic Forecasts.

Basildon uses three figures in considering its OAN range. The SNPP 2012 London and two variants of an Economic Scenario:

- The SNPP 2012 London, takes the SNPP 2012 (The "starting point") and recalibrates it to assume that migration from London will be facilitated and accelerated. The SHMA clearly states³ that the use of this projection is a policy rather than a demographic judgement. Basildon Council wants large scale growth but is not being open with the public about this.
- Two variants of an 'Economic Scenario'
These two variants take an estimate of how many jobs might be created over 20 years, assumes minimal 'slack' in the labour force and asks how many houses would be needed to accommodate the workers to fill those jobs. This is described in more detail in 3.4 below.

3.4. Detail on the Economic Scenarios

3.4.1. The base jobs estimate – a highly uncertain foundation

No one knows how the local and global in economy will fare in one year, five years, twenty years; but it's useful that consultancies prepare forecasts. Like weather forecasts these are highly uncertain – you wouldn't bet your house on one – but they're still useful.

³ Section 3.56

Basildon prefers Experian's 2015 20 year estimate of 11660 jobs to Experian's 2014 20 year estimate of 8440 jobs. These are very different and equally uncertain foundations on which to build our future.

The reality could be that we have less jobs in 2034 than we do now – a previous iteration of EEFM's forecasts, published in 2012 estimated that there would be a reduction of 700 jobs in its projection period.

We don't know, neither do Experian, Edge Analytics, Turley Associates or Basildon Council.

3.4.2. Circular logic – what is the assumed housing input?

Economic Scenarios usually have a Housing Figure as an input as well as an output. The higher the pre-supposed level of housing entered into the formula, the higher the recommended output.

For instance, BBC's Employment Land and Premises study (section 7) noted how:

- An housing input assumption of 13,800 homes to the Experian model gave an output of 7,400 jobs
- An input assumption of 17,000 homes to the model gave an output of 9000 jobs.

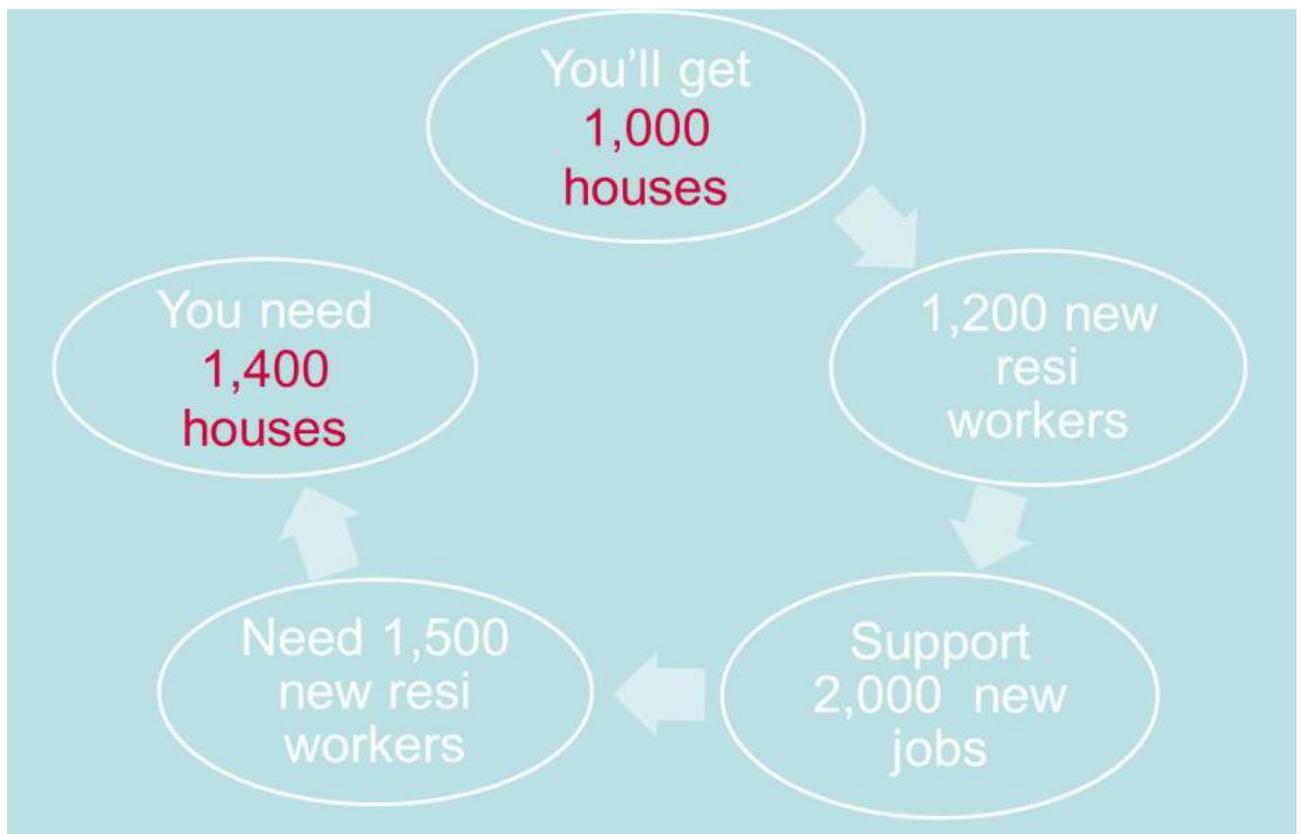


Figure 1 - Circular Logic of 'Economic Scenarios'
Source: Peter Brett Associates for the Planning Advisory Service

So what is the Housing Figure used as an input here?

3.4.3. Turning the Jobs estimate into a housing requirement - Assumptions
As described, Turley take an estimate of how many jobs might be created in the borough over twenty years, and this figure has an unspecified assumption of housing growth built into it.

The projections assume there is minimal slack in the local labour force, as they assume measures of the 'Latent Labour Force' will remain more or less constant.

It is assumed that:

- Unemployment remains at 6.3% to 4.5% (6700-4800 people)
- There will still be the same proportion of economically inactive (currently around 30,000 people). This categorisation includes retired people, those on Jobseekers Allowance, students etc.
- There will still be the same proportion of part-time workers (currently around 18,000 people).
- 47% of the employed workforce will continue to work outside the borough (around 50,000 people)

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

As the latent labour force is largely excluded – including local residents working outside the borough – and local people already working in local jobs can't be considered available; just who is considered available to fill the new jobs?

The principle difference between the two variants of the 'Economic Scenario' is that whereas the lower variant makes an allowance for increased workforce participation by the 60-74 age group and also for 'double-jobbing' by part time workers, the second does not. The significant difference between the two outputs highlights the sensitivity of the (undisclosed) formulae to a very minor dose of common sense.

It's worth noting that all the three Economic Scenarios considered in the earlier 2014 Turley\Edge Analytics 'Housing Growth Topic Paper' assumed an increased proportion of the 60-74 age group would be working. A suspicion is that the higher variant 'option' was put forward in the knowledge it was untenable and was there to provide a more extreme option that could be rejected, allowing the middle option to be selected and an impression of moderation created.

3.4.4. Turning the Jobs estimate into a housing requirement – Rationale
Whereas the SNPP-2012-London is a statement of intent that could be paraphrased as "We will facilitate accelerated migration from London", the two variants of the same economic scenario follow an involved and worryingly flawed line of reasoning, paraphrased below:

- We will assume that the jobs forecast can be achieved.
- We will assume that the jobs forecast should be achieved but that theirs is no slack in the local labour force – despite the very large 'Latent Labour Force'.

- So to achieve the creation of the number of jobs forecast we must bring to the borough a very large pool of new labour, and their families, and make sure additional homes are provided for them.
- The size of this additional pool of labour must be all the larger because we will assume that 6.3-4.5% of incomers will be unemployed, a very large proportion of the will be 'economically inactive', 47% will commute out of the borough etc.

3.5. OAN summary

3.5.1. Policy led focus on higher options?

The 'Starting Point' of **13,200** is quickly dismissed and the SHMA only seriously addresses much higher alternatives focuses on the:

- SNPP-2012-London 'projection' (**14,420**)
Note: It's not clear why the initial figure quoted for this option (14,420) differs from the 14,160 mentioned in the source documentation (Greater Essex demographic forecasts Phase 7). It may be from a highly dubious application of the 2001 UPC (Unidentified Population Component).
- Two variants of an economic scenario based on a 2015 economic forecast from Experian (**14,100** and **15,880**)

3.5.2. Market Signals: Adding 5-6% to all projections to reach final OAN

The SHMA notes how household formation among younger cohorts has declined in recent years due to affordability issues. It recommends that the appropriate response would be to add 5-6% to every potential OAN figure.

One counter-argument is that a higher proportion of Affordable Homes is the best way to address this.

If we were to assume that the rationale for the increase was an intention to benefit the existing young population of the borough we could also make counter-arguments that the suggested uplift was already covered by:

- The use of the highest reasonable assumptions as input to the formulae (2012 assumptions rather than a blend of 2012 and 2011 assumptions)
- The use of a policy and methodology designed to deliver a very high rate of growth rather than an arguably more objective approach to OAN.

The uplift means that the candidate scenarios are now elevated to

- SNPP – London – 2012 (**15,260**)
- Two economic scenarios based on a 2015 economic forecast from Experian (**14,940** and **16,740**)

From this the SHMA concludes that the OAN should be in the range 15,260 - 16,740. The mid-point of these figures is 16,000, exactly the same number as Turley recommended in 2014, albeit with slightly different rationale.

3.5.3. Alternatives Presented

Based upon the figures above, the Local Plan document gives three options

- A Plan based on no Green Belt Loss

BBC view this as 6500-7000 homes, though this should be boosted to around 8000 or more through the use of a Windfall Allowance. This is dismissed in a swift sentence which states (rather than argues) that there would be social and economic harm from such a figure. However, we intend to show that there is very great social and economic harm in meeting the chosen OAN.

- 15,260

A policy of accelerated migration from London. This figure assumes that a large majority of Basildon's 'Latent Labour Force' will remain on the 'scrapheap'.

- 16,740

A policy of accelerated migration from London. This variant assumes still more of the 'Latent Labour Force' are not considered in the calculations.

The Local Plan (p24) concedes that building this many homes risks causing social harm:

"There is therefore a risk that providing homes at the higher level may mean there is an over-supply of labour compared to the jobs available. This may act to exacerbate unemployment, particularly amongst the least skilled parts of the community, or else exacerbate out-commuting having an impact of transport infrastructure capacity and air quality."

The alternatives presented are problematic as options B and C are essentially the same – the way the plan is structured (see 3.7 below) means that the eventual number of houses built is likely to exceed both option B and option C, potentially by a very considerable margin.

Neglected alternatives are a Housing Target based on Natural Growth (sub-OAN) or an alternative based on meeting an orthodox OAN (11,200 to 13,500).

3.6. Social Harm of meeting OAN

It's easy to understand why BBC would seek to facilitate the creation of 11,600 jobs – however the rationale behind the OAN means that those seeking work in Basildon would not benefit.

If the **minimum** of around 15,260 homes were built, and the jobs created (and maintained) then the levels of social deprivation in Basildon would be exactly the same.

- What happens if the jobs don't come?
- What happens if the jobs don't come and the potential **maximum** level of building (see 3.7 below) occurs?

The method used to determine this OAN runs counter to the aims of the Plan set out in the 'Vision' as it would be likely to create a surplus of labour. This would lead to worse rates of unemployment, lower wages and lower levels of job security.

The next section (see 4) goes on to describe how meeting the Plan will have a major adverse impact on the commuter infrastructure on which the borough depends. This would have further socio-economic problems.

3.7. These are minimums

The total of 15260 homes is likely to be exceeded by a very considerable margin due to the following factors:

- At least 2000 windfall homes, many categories of which could instead count towards a Windfall Allowance (see 5) to save Greenfield sites and promote urban regeneration.
- Most Allocations are of fairly low density, it's likely this will be exceeded in some cases and mean we have several hundred extra homes.
- The 'Safeguarded' areas removed from Green Belt for future development, might, as a result of a Plan Review, be brought forward sooner:
 - Burnt Mills (Policy E8b): 1200-2000 homes
This area is proposed to be removed from Green Belt in order to provide a future Employment Land. Under the draft 2014 Plan this area was earmarked for 2000 homes and a future Plan Review may, having already removed the land from Green Belt, reallocate this for housing.
 - Area west of Dunton removed from Green Belt in order to provide 1350 homes in future.
- Areas just beyond our boundary but which would become part of the urban areas of Basildon and Wickford respectively
 - 4000 Brentwood are proposing to build as part of 'Dunton Garden Suburb'
 - 600 homes being built by Chelmsford at the Runwell Hospital site on the edge of Wickford.

It's possible therefore that the final figure could rise as high as 25,000 an increase in homes of one third.

3.8. What happens after 2034?

If the current Plan goes ahead, and the population of the borough goes through this significant and voluntary growth, with all its attendant problems, Basildon Councillors in the 2030s will face a huge problem.

Need, however it's calculated, will have risen roughly in proportion to the increased population; however the borough's ability to sustainably take these houses - and the current ability is disputed - will have shrunk.

A lower housing target might leave potential for future local needs to be met in the area, and would therefore be more desirable and sustainable.

4. Commuter Infrastructure

Basildon, like the rest of the TGSE Housing Market Area is a commuter economy, strongly shaped by its proximity to London.

Any sensible local Plan should have due regard for its impact on the commuter infrastructure on which its economy depends. Without such an analysis the Plan may be judged to be unsound.

Like many areas close to London, that is to say Green Belt areas, the commuter infrastructure is very strained.

Our understanding is that one of the original reasons for the creation of the Green Belt was that Patrick Abercrombie and others recognised that London's commuter infrastructure was in danger of being overwhelmed by growth at and around the city's periphery, a problem that would damage the capital's economy.

The aim was to channel growth away from the periphery to central areas and areas far away from the city – locations where spare capacity existed or which had potential to be affordably increased.

The situation has evolved since then, but the overall rationale is as strong and relevant as ever.

4.1. Strategic Roads

The Local Plan approaches the strategic arterial roads, the A127 and A13 in a proactive positive way.

The Plan acknowledges that these roads are overloaded, the A127 for instance being as busy as some Motorways, and the Plan describes how the Council is lobbying for these roads to be widened. But lobbying alone does not make a Plan sound.

The road widening projects would each be multi-billion pound schemes and so it is doubtful that they will ever be built, and if they are, the roads are unlikely to be approved for many years, and there would be years of disruption before the capacity improvements were available.

In 2014 the Department for Transport (DfT) approved plans to widen the A12 between Brentwood and Chelmsford, but these works are not scheduled for completion until 2028. It is therefore reasonable to conclude that the widening of neither road will be achieved within the Plan period.

Note: Unlike the A127 and A13, the A12 has a negligible impact on Basildon Borough and the Local Plan.

Strangely, despite recognising the severe limitations of the A127, the Plan refers to the study document "A127 corridor for growth" as implying the presence of the road makes the borough is a suitable location for growth. The title of the document belies the content which details the many problems the road faces and which are a strong argument against using the road as a corridor for growth.

Whilst acknowledging the limitations of these roads and seeking to deliver the *theoretical* potential for capacity improvements; the Council is simultaneously pursuing a policy of major growth.

Instead it would be more prudent for the limitations of these links to be used as a constraint to growth.

Note: A similar study of the A13 is being undertaken and we await the results with great interest.

4.2. Rail – Local Plan

As important as the roads are, their importance to the local economy is not as great as the railways.

25% of the TGSE HMA employed workforce commute by rail to London. The 2011 census gives 16.6% of Basildon Borough's workforce commuting by train and in Billericay this reaches 26.9%. The 2011 census was taken during a recession and footfall analysis at these stations indicates that these figures have increased since that time and the figures are higher still if only full time workers are included.

Whatever the exact current figures, a very significant proportion of local workers commute by train to London and the jobs held there typically pay far better than local equivalents.

The importance of the high incomes brought to the borough from London goes far beyond the families themselves to the many businesses – and their employees - which depend on the high metropolitan wages earned by a large proportion of our residents.

The railways from Southend to London are therefore of vital importance to the continued economic wellbeing of the area.

Unfortunately, the minimal mention there is of rail links suggest that little effort has been made to understand the nature of current and future services. The Plan suggests that Billericay and Wickford stand to gain from the Crossrail services that will come to nearby Shenfield from 2019 and from the opportunity to change at Stratford International for Eurostar trains to the Continent.

There are no international services stopping at Stratford and Crossrail will have negligible positive or negative impact on Billericay and Wickford. Appendix C describes the new services, but in short, a Billericay or Wickford commuter travelling to the West End is no more likely to change at Shenfield for an all stations Crossrail train, than a Basildon commuter is to change at Upminster for a District line train.

The Draft Plan and the Infrastructure Delivery Plan doesn't go far beyond these inaccuracies except to note (p24 IDP) that Network Rail and the relevant franchisees having failed to provide detailed input.

We understand that these bodies did not contribute to the 2014 consultation and that Abellio at least, will not respond to this consultation as they are competing to renew their franchise on the Greater Anglia network.

BAG have researched information already in the public arena and also corresponded with these organisations. As a result we're able to present a number of key pieces of information.

4.3. Greater Anglia – Southend Victoria Line

The Great Eastern section (branches via Shenfield) of the Greater Anglia Franchise is acknowledged to be at capacity.

4.3.1. Demand

Demand is expected to grow 26% in 2013-23 and 67% in 2013-43⁴ and these predictions were based on lower housing targets than currently proposed in Basildon Borough.

Analysis of the footfall data at Billericay and Wickford stations for the first two years of projection period show that those stations are ahead of the growth trajectory – and that's before the large scale house-building has started.

Figures for Southend Airport station are still further ahead of the trajectory for the line, and while the forecasts may (or may not) already have this factored in, they will not have factored in the disproportionate impact of airport users with their bulky obstructive luggage, on busy standing room only commuter trains.

4.3.2. Potential capacity

All peak time trains through Billericay and Wickford are their maximum length of 12 cars and Abellio do not believe it is feasible to ever run longer trains.

There is an exception in that a very small number of 8 car services originating on the Southminster branch. These can currently go no longer due to platform sizes on that branch, a branch which is most unlikely to create the return on investment necessary to justify such expensive platform lengthening works.

The Southend Victoria branch – running 6 tph merges with the branch running via Chelmsford at Shenfield, and the combined route from there to Liverpool Street has 22 trains per hour (tph) on this crowded stretch, the most that can be reliably run at this time.

However, an indirect benefit of Crossrail is that an anticipated future £100m piece of work remodelling Bow Junction would allow Great Eastern trains to make better use of the spare capacity of the metro tracks between the Crossrail portal at Stratford and the platforms at Liverpool Street that have been made available by the fact that most of the Metro trains will now take the Crossrail tunnel.

This potential remodelling raises the prospect of the current 22tph being raised to 24tph, though there would be a trade-off of reduced reliability. Abellio consider that this is the most frequent service that could ever be reliably operated⁵ and this is unlikely to be delivered before the mid 2020s.

⁴ Anglia Route Study 2014

⁵ Correspondence from Abellio to BAG – 11/09/2015

It is hoped that both of these services would go to Southend Victoria increasing capacity by 33% and this would take us to the theoretical capacity limit, barring minor increases from tinkering – such as removing First Class compartments.

However these services could instead go to one of the many branches beyond Chelmsford, and the proposals for two new towns in north Essex and the potential for growth in Suffolk and Norfolk mean that the Department for Transport face a very difficult decision about where to route these potential services.

It's also possible that there won't be additional Great Eastern services as:

- DfT may prioritise the 'Norwich in Ninety' campaign and favour faster inter-city services over other options – fast trains occupy a larger 'envelope' than slower trains and limit capacity in that way.
- DfT may prioritise Metro services within London and instead run more slow trains from Shenfield to Liverpool Street (ie increasing the number of slow trains that use the current Liverpool street 'above ground' rather than heading through the Crossrail tunnel whose capacity is restricted by the branching of Crossrail services east of Whitechapel).

At the current time the Plan should prudently assume that there won't be any extra services.

Note – desperate measures: We understand from conversations with Planning Officers at consultation events that BBC have been in touch with Abellio who advise that they are considering increasing capacity by removing seats and increasing standing capacity. This may be a necessary evil for short urban commutes but unacceptable for longer journeys.

4.3.3. Future shocks

- The anticipated growth in demand described in the Anglia Route Study cannot foresee every eventuality and since it was produced a reason to re-assess the predictions upwards has become apparent.

HMRC is bringing several regional offices together to form a major hub at Stratford, this will cause the office at Southend to be shut and most of the 1200 staff to be transferred to Stratford.

Some staff will lose their jobs but the majority will stay and can be expected to travel to the Stratford on the Southend Victoria branch, this could easily increase demand by 5-10% and this does not include the impact of people travelling to the many thousands of other jobs moved to\created at Stratford.

It's worth noting that the HMRC move will also add extra demand to the C2C line.

- The growth of London's population and the importance of London as the best and most sustainable place to meet its own housing needs are likely to mean that services within London are likely to be prioritised, often at the expense of services beyond the capital. We have already

seen the impact of this with the C2C timetable change in January 2016 (see 4.4).

With regard to Southend Victoria, these impacts are likely to surround the need to relieve Crossrail, where demand is expected to quickly outstrip supply.

- The metro tracks carrying slow trains (Crossrail and TFL Rail from Shenfield to Liverpool Street) can run many more trains than they currently do, and than they will when Crossrail begins operation in 2019. Extra TFL Rail services may be commissioned to take this on and this would reduce resilience on Great Eastern services by limiting and possibly ultimately removing the potential for track sharing.

The services are generally segregated but share tracks at times of planned or unscheduled service disruption.

- Another potential problem is that the desire to relieve Crossrail will mean more Great Eastern services will stop at Romford, a move that would significantly increase demand.

A similar London need was behind the changes to the C2C timetable which increased demand on the line by 20% overnight.

4.3.4. Very long term potential solution

The National Infrastructure Commissions recent report argued that there was 'currency' in the idea of a future Crossrail\Thameslink type rail link on a Canary Wharf\Stratford axis, possibly linking to Brighton in the south and linking to the Lea Valley (West Anglia) lines in the north.

If the northern section of such a route were instead to feature a new line heading up the Roding Valley to provide an alternative route to the Gt Eastern line at Chelmsford - it would allow some services from beyond Chelmsford to take the new route. The slack created could be taken up by services from both the mainline and the Southend branch.

Such a scheme, if it went ahead would be unlikely to be available till at least the 2040's, far beyond the Plan Period.

4.4. Essex Thameside – Southend Central Line

The draft Local Plan describes this line as close to capacity, that assessment was made obsolete by C2C's (the franchisee) January 2016 introduction of a new timetable aimed at rebalancing the services of the line in favour of London stations.

The changes meant that almost all trains would stop at all London stations. Demand increased by 20% overnight⁶, and Basildon commuters were particularly badly affected as most starter trains from Laindon were discontinued at this time.

⁶ See Q13 - <http://www.c2c-online.co.uk/travel-information/timetables-trains/your-questions-on-the-new-timetable-answered/>

4.4.1. Demand

The Essex Thameside line is over-capacity, and worse still, this demand was expected to grow 14% in 2013-23 and 47% in 2013-43⁷ with that estimate based on lower housing targets than currently proposed.

The January 2016 timetable change was an unforeseeable shock that has made these projections a hopeless underestimate; 20% was added to the base figure and the projected growth demand must be calibrated to take into effect the rebalancing of the services to focus more on London stops which will experience far higher population growth than the rest of the line. Even ignoring the essential recalibration of the demand projections, it can be conservatively estimated that the shock of the timetable change will mean demand grows 36% in 2013-23 and 76% in 2013-43.

4.4.2. Potential capacity

We understand that it is probably not feasible to reliably run more frequent trains on C2C, the challenge of running more regular services is with timings and positioning of carriages at the turn around point at Fenchurch Street, which in the busiest parts of the peak has train departing every three minutes making it one of the busiest London Terminals in terms of frequency of departures.

The maximum train length is 12 carriages; some trains are this long but most trains are 8 carriages with a few running 4 carriages.

So there is potential for capacity to be increased through extra carriages, but unfortunately no more rolling stock is available until at least 2019 when an as yet undisclosed amount of carriages will be procured. In the interim, C2C recognise the pressing need for more rolling stock after the severe problems brought on by the timetable change. Unfortunately, negotiations to procure second hand rolling stock broke down.

In the long-term, the purchase of extra rolling stock could eventually allow capacity to be increased to a probable maximum of around 50%, however that would not be for many years and even then would not come close to meeting the likely increases in demand described above.

4.4.3. Future Shocks

Barking is a major transport hub and it is reasonable to hope that expected growth in demand on connecting services including the upcoming extension to the Gospel Oak and Barking Line (GOBLin) to Barking Riverside is already factored in to anticipated growth on the C2C line.

However the proposed extension of GOBLin over the river to south London will not be included. The proposal, backed by the Mayor of London, is to connect Barking with existing Overground services south of the river to form the 'Zone 3 Orbital' or 'R25' line.

Connecting Barking with a whole new catchment in south London is likely to increase demand on C2C as south Londoners become able to change at Barking to take the C2C line to Fenchurch Street.

⁷ Anglia Route Study 2014

4.4.4. Very long term potential solution

The proposed Crossrail 2 railway would, if built, be delivered in 2033 at the earliest. There are also proposals that if built, an eastern branch via Hackney Central be subsequently added. One of the options is for such a branch to extend to Barking and beyond, taking over the C2C branch via the new Beam Park station and onwards to Grays.

If the trains on this route were diverted onto Crossrail 2, then this would free up paths into Fenchurch Street which could then be allocated to services via Basildon and via Chafford Hundred.

This measure, if delivered, would not be available till long after the Plan Period. Additionally it's important to note that such a change of service would be controversial with users of that branch who would lose their direct route to the City and many of these people would then change to C2C services at Barking in order to continue onto Fenchurch Street, thus negating some of the benefits gained by users of other C2C routes.

4.5. What will Rail Failure look like?

Passengers will go from wondering whether they'll get a seat to wondering if they'll be able to squeeze on a train or be forced to wait for the 2nd or 3rd etc train a problem only normally experienced at times of service disruption.

This would have a significant impact on reliability of the network as scheduled 'dwell times' at stations would be exceeded, affecting every train on the railway at that time and causing ever more frequent service delays.

Commuting to London would become less tolerable, especially for the physically weak. People would be less willing to work in London, less able to get to work on time and less likely to tolerate additional connecting services within London, reducing the physical area in which holding jobs is viable.

As well as the quality of life issue, these problems will reduce opportunities for earning and career progression, it will also reduce the level of wages brought back to the borough by its commuting workforce.

Building 15,000+ houses will worsen the outlook for the railways and have a negative economic effect.

4.6. Railways – Tipping Point

The railways run parallel and even at their widest separation from each other – in Basildon borough – people often feel they have a viable choice and may switch between lines depending on factors such as cost, overcrowding, connecting services etc.

With both services at capacity, with demand expected to soar, with best case scenario capacity unable to keep up, a crisis point will surely be reached by first one railway and then the other.

It's not possible to say which line will crack first, but when conditions on one become intolerable a large number of commuters will transfer to the other line, and that may be the tipping point, that may bring the second line to 'breaking point' soon after the first.

5. Windfall Allowance

As described, BBC has developed an unnecessarily high OAN of at least 15,260 which it chooses to meet in full. To meet this figure, it has first identified what could be delivered using currently available non-Green Belt sites (around 6500-7000) and then identified Green Belt sites which it could release in order to make up the difference and meet the OAN.

A 'Windfall Allowance' would allow fewer countryside sites to be designated for any given OAN or sub-OAN Housing Target (Though a figure *entirely* constrained by Non-Green Belt availability would also be a legitimate choice).

5.1. Windfall Sites

Windfall Sites are those that have not been identified in advance in development plans, they are typically non-Green Belt sites and are often vital for urban regeneration.

Larger examples that came forward in 2014 include the proposal for 384 new dwellings to be provided in Trafford House and the 87 approved on the former Audi car showroom in Wickford.

5.2. Windfall Allowance

The NPPF⁸ allows Councils to make an Allowance for anticipated future Windfall Sites to count towards their Housing Target as long as they can show that such sites have consistently become available in the past.

This Allowance does not change the overall OAN\Housing Target, but means that less Green Belt land would need to be removed from Green Belt to meet it.

If Council's do not include such an allowance, the Windfall sites arising are developed in addition to the sites pre-identified in the Plan, i.e. in Basildon's case, on top of the 15,260.

Changing guidance on converting commercial premises to residential use, makes the case for a significant allowance still stronger.

5.3. Draft Local Plan

The latest Plan makes no allowance for Windfall and BBC argues against an allowance, claiming that it's discouraged and that therefore the Windfall will be in addition to the allocated sites.

BBC do not back their view with any evidence, and there is nothing in the NPPF or PPG to support that view. The Planning Inspectorate does not seem to share their view, having approved many Windfall Allowances in recent years – indeed they wrote to Brighton and Hove Council on 13th December 2013 to challenge their lack of a Windfall Allowance

⁸ Para 48

“The Council should investigate whether or not it would be appropriate to make an allowance for windfall sites”.

This has led Brighton and Hove to include a Windfall Allowance in the latest draft of their Plan, as shown in the table below.

5.4. Other Authorities

This is a mixture of draft and adopted Plans. Our observation is that the largest Allowances are the most recent which may indicate that authorities are increasingly confident that significant Allowances are prudent and acceptable.

The table shows Windfall Allowances which are converted to 20 year equivalents where the authority had a shorter Plan Period. No two authorities are the same and the intention here is not to advocate a particular number but to show that a significant Allowance is probably appropriate.

Authority	Population (thousands)	Windfall Allowance
Basildon	181	0
Brighton?	273	1250
Bath and NE Somerset	182	1800
NE Lincolnshire	160	1300
Reigate and Banstead	143	1000
Swale	141	1606
Warwick	139	3770
Wychavon	120	1494
Gt Yarmouth	98	2058
Uttlesford	84	1000
Brentwood	76	928
Maldon	63	400

Since Basildon does not have a Local Plan, all recent developments can be considered as 'Windfall', and in 2009-14 this was approx. 430 gross completions per annum and some categories of these houses qualify to help us calculate an appropriate future Allowance.

There are several reasons why we could not aspire to an Allowance of the magnitude of 568pa, however this high rate of past delivery does give confidence that Basildon could include a still significant Windfall Allowance.

Including a Windfall Allowance would significantly reduce the pressure to designate countryside and parks for development.

Note: Temporary relaxations in government policy to aimed at promoting brownfield redevelopment, such as measures make it easier for LAs to allow the conversion of offices to residential, may increase the potential size of such a Windfall.

5.5. Consequence of not having an Allowance

If a Windfall allowance is not included:

- More homes will be built on Green Belt as BBC could not then contribute to its Housing Target with the urban Windfall Sites it could allowed for.

- Urban regeneration will be stifled as the ready availability of Greenfield sites makes it less economical for house builders to invest in the type of Brownfield regeneration that Windfall sites generally represent.
- The likely reduced level of Windfall sites delivered, will be in addition to the 15,260 minimum placing more pressure on infrastructure.

6. Conclusions & Recommendations

6.1. Conclusions

6.1.1. Basildon need not build this number of homes

The OAN is unnecessarily high, being based on a policy of growth. Basildon is not obliged to build on Green Belt; it can use Green Belt as a constraint to meeting OAN and so produce a sub-OAN Housing Target.

Basildon should also use Transport limitations as an additional constraint to meeting OAN.

6.1.2. Social Impact – Surplus of labour

Meeting the OAN is likely to lead to a large local surplus of labour in the borough. The Plan itself acknowledges the risk (p24).

The consequences would include increased rates of joblessness, structural joblessness and other indicators. Wages and job security are likely to be reduced.

This runs contrary to the Vision and policies stated in the Plan. Basildon should not meet the OAN.

6.1.3. Socio-economic Impact – Commuter infrastructure

Railways and strategic roads are acknowledged to be at capacity at peak times.

Demand for the railways is projected to soar and capacity cannot keep up. Worse still this paper describes reasons why these large increases in demand are likely to be exceeded.

This would lead to a loss of opportunities and income to the large number of local people working in London and the economic impact would go beyond their families to those businesses who rely on the incomes brought back from the capital.

This runs contrary to the Vision and policies stated in the Plan. Basildon should not meet the OAN.

6.1.4. Tests of soundness – Not justified

The Plan presents three options, but two of these are essentially the same in that they both propose meeting a very high OAN that would in any case be exceeded.

As described above the second two options are socially and economically unsustainable.

As well as the 'No Green Belt loss' option, two further options are proposed below.

6.1.5. Tests of soundness – Not in line with government policy

BBC is choosing to develop a large OAN, proposing to meet it, including no windfall, having weak policies on housing density and removing very large areas from Green Belt – over and above what's required to meet the very large OAN.

In doing this Plan is counter to government policy by promoting large scale growth in a Green Belt authority and channelling most of it to the Borough's Green Belt land.

6.1.6. Test of soundness – Not Positively prepared

The draft Plan does not recognise the importance of the railways, seek to understand the challenges they face or seek to address them.

6.2. Recommendations

- Basildon Council should abandon its approach of seeking to accelerate migration through an OAN based on 'Economic Scenarios'. Instead it should seek an orthodox OAN based upon extrapolating past migration levels to the borough.
This would be in the region of 11,200-13,500 homes though there is scope for arguments to be made to adjust that up or down.
- A Windfall Allowance should be included in the Plan.
- Basildon Council should then consult – based on the following three potential Housing Targets
 - Meeting the new orthodox OAN in full, with the inclusion of a Windfall Allowance.
Approx 11,200 to 13,500 homes.
This is arguably the default approach in non-Green belt areas.
 - A sub-OAN Housing Target based on Natural Growth requirements (8600-10600). A total of **10,200** would allow the SHMA's 3660 Affordable Housing recommendation to be met based on 36% of new homes being classified as Affordable.
This would include a Windfall Allowance.
 - A Housing Target based on little or no Green Belt loss and including a Windfall Allowance.
Approximately **8000** homes.
Based on the NPPF\PPG this is intended to be the default in Green Belt areas.

A lower housing target would put the Council in a strong position to negotiate contributions and conditions with developers, it would also mean that contributions could be focussed on positive social factors such as Affordable Housing rather than local infrastructure measures which would, at best, allow the local 'running to stand still' (at best) local infrastructure measures necessitated by the unwisely large growth in population.

Appendix A: Green Belt Protection

A.1. Nick Boles to Sir Michael Pitt - 03/03/2014

The Under-secretary of State wrote to the Chief Executive of the Planning Inspectorate to castigate the NPI for misinterpreting the NPPF\PPG and emphasise that the government would step in to protect Green Belt if the NPI pressurised authorities to re-draw Green Belt boundaries against their will.

"I was very troubled by the media coverage of the recent Inspector's report on the examination into the Reigate and Banstead Local Plan. On reading the report, I was disturbed by the Inspector's use of language, which invited misinterpretation of government policy and misunderstanding about the local authority's role in drawing up all of the policies in the draft plan. I am writing to restate very clearly the Government's view of Green Belt policy and Local Plan examinations...

...It has always been the case that a local authority could adjust a Green Belt boundary through a review of the Local Plan. It must however always be transparently clear that it is the local authority itself which has chosen that path – and it is important that this is reflected in the drafting of Inspectors' reports. The Secretary of State will consider exercising his statutory powers of intervention in Local Plans before they are adopted where a planning inspector has recommended a Green Belt review that is not supported by the local planning authority."

A.2. Eric Pickles to Dunton campaigners

In 2015, Eric Pickles, the then Secretary of State for Communities and Local Government met Phillip Gibbs and Derrick Fellowes of RAID (Residents Against Inappropriate Development).

Mr Pickles stated, on the record, that there was no obligation for local authorities to build on green Belt, even if that meant they could not meet their OAN.

A.3. Letter from Eric Pickles to an Ingrave resident

In Eric Pickles wrote to an Ingrave resident concerned about the potential Dunton Garden Suburb development.

"I think I need to kill a couple of myths that seem to have crept into the debate.

Firstly the government is not opposing ANY housing numbers...the figures are derived from the Council's own estimation of housing needs.

Secondly, there will be no building on the Green Belt unless there are exceptional circumstances. Failure to meet the Council's housing targets are not 'exceptional circumstance'. Too many people have told me that they have been given the impression the Local Plan will only be passed if it includes building on the Green Belt. This is both wrong and misleading."

There are many similar communications from Eric Pickles and Brandon Lewis available.

A.4. Central Government criticises LA Officers

In October 2014 Eric Pickles gave an interview to the Daily Telegraph.

The article described the new planning guidance which further strengthened Green Belt Protection and went on to quote a government source criticising the misinterpretation of the NPPF and subsequent bad advice provided by many LA Officers.

“Many council planning officers are telling their councillors that they have to remove Green Belt protection when drawing up their Local Plans, in order to meet [housing] demand.

“We are making clear that this isn’t the case, and they can take into account development restrictions – such ongoing Green Belt protection – when drawing up their Local Plans and determining how many houses they want to plan for.”

A.5. Ministerial Statements in Parliament

“...So green belt should be re-designated only in exceptional circumstances and as a last resort. Furthermore, the NPPF notes green belt as one of the environmental constraints on development in the framework and *local planning process.*” (our italics)

Brandon Lewis MP 5th March 2015.

Then Minister of State for Housing and Planning - Hansard 396WH

The same point has been made by ministers in parliament one more than one other occasion, for instance by James Wharton in Parliament on 26th January 2016.

A.6. Planning Inspector’s visit to Castle Point

In 2014 Planning Inspector Keith Holland met Castle Point Councillors and Officers and advised them that they need not build on Green belt to meet OAN.

http://www.echo-news.co.uk/news/11450184.Video__Green_belt_land_in_Essex_could_be_saved_after_leaked_video_shows_planning_inspector_saying_Government_would_not_force_councils_to_build_homes/

A.7. Castle Point Councillors and Officers visit Parliament

In June 2015, Rebecca Harris MP (Con) arranged for Castle Point Councillors and Officers to meet Brandon Lewis, now the Secretary of State for Communities and Local Government and Planning Inspectors at the Houses of Parliament.

Councillors left with confidence that they need not develop Green Belt.

<http://www.rebeccaharris.org/news/minister-confirms-green-belt-can-be-protected>.

A.8. Rebecca Harris MP writes to Echo to summarise LA responsibilities

In November 2015 Rebecca Harris wrote to the Evening Echo to clarify that the Government does not set housing targets and also to clarify the responsibilities of Local Authorities.

"...In fact there are no longer government targets. Councils are instead asked to calculate properly their projected need, then apply constraints that might exist for allocating them, one of which is green belt, and then show what numbers they can actually achieve.

"Councils can choose to over-ride the new stronger green belt protections and build on the green belt if they can give good evidence as to why they should be permitted to do so and the Government is unlikely to turn them down."

"However it is the Councils choice, not something the government will impose, as was the case under the old planning law, before the coalition planning law changes."

"Different ministers and different planning inspectors have repeatedly explained this to councillors in person"

A.9. E-mail from Kriti Bami (Asst. Private Secretary to Brandon Lewis)
Ms Bami wrote to Rebecca Harris MP on 27th January 2016, to re-iterate that GB remains protected and to soothe fears about the consequences of government taking over a Plan.- 27/01/2016.

"...We have safeguarded planning protection for Green Belt, open countryside and other important environmental designations. However it is for local authorities to decide the most appropriate approach for their area. Where green belt is constraining a local authority from meeting objectively-assessed need, then they may wish to consider whether exceptional circumstances exist to warrant re-drawing their Green Belt boundaries, but these are decisions for the local authority.

"The report refers to our commitment to intervene where a Local Plan has not been produced by early 2017, where this will accelerate getting a Plan in place. We will be consulting on criteria that will inform our decisions on where to intervene...Should the Secretary of State need to step in, measures in the Housing and Planning Bill would give him options to enable more decisions to be made locally"

A.10. Castle Point Conclusion

As a consequence of repeated re-assurances from ministers and planning inspectors, Castle Point Councillors have decided to develop a Plan based on a sub-OAN Housing Target with little or no Green Belt loss.

A.11. NPPF\PPG – Chapter and Verse

The NPPF describes how, once established, Green Belt boundaries should only be altered in 'exceptional circumstances', through the preparation or review of the Local Plan (Para 83 NPPF).

It goes on to say that (our emphasis):

"As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances." (Para 87 NPPF)

Planning Practice Guidance further clarifies this:

"The Framework is clear local planning authorities should, through their Local Plans, meet objectively assessed needs **unless** any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to... land designated as **Green Belt**." (Para 044 NPPG)

"...assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any **constraints such as Green Belt**, which indicate that development should be restricted and which may **restrain the ability of an authority to meet its need**." (Para 045 NPPG)

"Unmet housing need...is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt." (Para 034 NPPG)

An OAN can take no account of Green Belt, however it is also clear that Green Belt is a constraint on meeting an OAN and that a sub-OAN Housing Target should be standard practice where GB does act as a constraint.

The Green Belt has five purposes (Para 80 NPPF):

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

Green Belt achieves these aims by keeping the land 'permanently open' (Para 79 NPPF), and it is hoped that this document makes clear that there is no requirement in the NPPF or elsewhere, for LA's to remove land from the Green Belt.

To summarise: Removing land from Green Belt is a choice, not an obligation.

A.12. If GB was not protected, what would its purpose be?

Most local authorities aren't fortunate enough to be within one of the Green Belts and so they must generally meet their OAN.

Plan making gives them an opportunity to state where they want this development to take place, and crucially where they don't want it to take place (subject to still meeting the OAN).

If Green Belt wasn't a legitimate constraint to meeting OAN, what would its purpose be?

If it wasn't a legitimate constraint then a Green Belt authority would have no advantages over a non-Green Belt authority.

A.13. Other authorities have approved sub-OAN Housing Targets

As of March 2014, fifteen local authorities have approved local plans with sub-OAN Housing Targets. Some of these are based on environmental constraints such as Areas of Outstanding Natural Beauty (AONB), which, like Green Belt is mentioned as a constraint in NPPF\PPG.

Appendix B – Impact of Crossrail

Crossrail is an enormously important project for London, but its impact on commuters at its Shenfield terminus is small and the impact for commuters on the Abellio lines to Southend Victoria and via Chelmsford is smaller still.

Crossrail has involved creating a tunnel under London to link two previously separate commuter lines with a new tunnel. The eastern arm is the existing Shenfield to Liverpool Street service (via Stratford) and the western arm is the existing Reading to Paddington services.

A second entirely new eastern arm has been added to Canary Wharf and Abbey Wood (SE London) with the interesting side effect that while 24 trains per hour (tph) can pass through the central tunnels, only 12tph can continue onto each of the eastern arms. The two lines split east of the new Whitechapel station so Liverpool Street is part of the core section.

There are currently 15-16 trains running on the Shenfield Branch (though most services start/stop in a much more central area) so the additional 3-4 trains will continue to terminate at Liverpool Street rather than going through Liverpool Street's new Crossrail underground station.

There won't be extra trains at Shenfield or elsewhere.

At Shenfield Crossrail will give new destinations in central and west London, but people heading to those new locations would be best advised to take a fast (Abellio) train and change at Stratford or Liverpool Street. There would no benefit in taking the slow all-stations Crossrail service.

There will be the same frequency of train services from Shenfield, but the trains will be bigger so capacity will be greater – however that will make no difference to Shenfield commuters travelling into London as they could expect to get a seat anyway.

There will be a disbenefit as Shenfield commuters travelling home will generally be getting on busy trains that have been travelling through central London, rather than getting on a train starting at Liverpool Street.

Crucially services are not expected to be quicker so Shenfield commuters using fast services are expected to continue to do so.

Note: Shenfield through Stratford and Liverpool Street is four-tracked. The slow Crossrail trains take one pair and the fast trains from Southend, Norwich etc, another. There is an element of track sharing however and this improves resilience of service when there is scheduled or unscheduled service disruption.

