

Basildon's "Objectively Assessed Need" Briefing Summary by Billericay Action Group (BAG)

This Briefing Summary accompanies v2.1 of the White Paper BAG has produced to show that the Objectively Assessed Need (OAN) proposed by Basildon Borough Council (BBC) is unnecessarily high. The OAN of 16000 new homes by 2031 goes far beyond the figure needed to satisfy the National Planning Inspectorate.

BAG's argument is based on detailed analysis of BBC's Housing Growth Topic Paper (HGTP) and other documents. The HGTP looks at scenarios and projections of various types such as Natural Growth, Migration and others.

BBC has chosen to reject these scenarios. They have instead chosen to utilise a much higher Economic Scenario. This choice is made despite the flawed assumptions built into the scenario, the social consequences of these flaws and the criticism of this approach by the TGSE Partnership and their planning consultants.

Therefore in conclusion:

1. The OAN was not imposed on BBC by Central Government or any Government body. It is the responsibility of Local Authorities to develop their own OAN.
2. The Framework and Guidance governing LA plan-making give Authorities considerable lee-way. There are several legitimate ways to reach an OAN.
3. An LA can submit an argument for a Housing Target lower than its OAN, citing constraints such as infrastructure and Green Belt.
4. BBC takes an average from lower, more up to date 2011 census data as well as higher, less robust 2008 data. Giving these datasets equal weight inflates the OAN.
Note: BAG's research only references the 2011 figures, an approach we share with Brentwood Borough Council whose OAN is based on 2011 figures only.
5. Basildon's 'Natural Growth' gives rise to a requirement of 8900 new homes.
6. Comparing this figure to the 16000 minimum shows that 44% of new homes will be provided for new arrivals from neighbouring boroughs, London and beyond.
7. Under the NPPF, BBC could not submit an OAN based on Natural Growth alone but must take past migration trends into account.
BBC examined a number of Migration-based projections in the 9700-13300 range, mostly at the lower end.
BBC could have selected one of these figures but chose to go further.
8. The proposed OAN is based on an Economic Scenario. Such scenarios take a broad estimate of how many jobs might be created in the borough over the next 20 years as their foundation.
 - a. They deploy a circular argument. In one document BBC argues that they require further new homes to house the outside workers necessary to fill these jobs – while in another document they argue that the large jobs total is only sustainable and necessary as it is assumed a very large number of houses will be built.

- b. In determining the number of new homes required to house the new workers, BBC makes the assumption that there is no slack in the Basildon labour market despite very high levels of unemployment, economic inactivity and other measures. Measures which will remain the same if and when the jobs are delivered.
 - c. A figure of 790 pa appears in graphs and recommendations and it is rounded up to 800pa in the local Plan, that's 16000 over the Plan period.
 - d. The assumptions behind the chosen Scenario are provided, but the formulae are not explained and they are only available at a cost of £600.
9. TGSE (Thames Gateway South Essex) Partnership, of which BBC is a member, explicitly criticise the type of approach taken by BBC and make a non-binding recommendation of 11900, though there are good reasons for lowering this figure.
 10. There is no evidence that BBC considered a Windfall Allowance which would alleviate pressure to designate countryside sites.

We recommend that the HGTP is revised and a new OAN proposed for the Local Plan. This should specifically focus on Natural Growth and Migration, not on Economic scenarios. We believe the terms of reference should be revised to request that:

1. Only Migration based Scenarios should be considered as these have been shown to provide sufficient labour to sustain economic growth and are in line with the NPPF.
Note: A lower OAN and/or Housing Total would mean that a lower and more achievable jobs target could be set. This would allow BBC to:
 - a. Spare Green Belt land round Basildon from industrial development
 - b. Deliver a far better workers/job ratio than the current Plan.
 - c. Spare some or all of the Green Belt and other open land, around all three towns, from residential development.
2. BBC should only use the most up to date datasets in their projections as Brentwood has done. The ONS will produce more up to date figures in November 2014.
3. Consideration should be given to the non-binding recommendation produced by TGSE.
4. Consideration be given to the inclusion of an allowance for Windfall Sites in the overall OAN.
5. In light of infrastructure and Green Belt constraints, that consideration be given to a Housing Target lower than the OAN.