

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

This Briefing Summary accompanies v3.0 of the White Paper that BAG produced to show how 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 and infrastructure 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 determine 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.** A Local Authority can submit an argument for a Housing Target lower than its OAN, citing constraints such as infrastructure and Green Belt. Planning Policy and Guidance describe how continued Green Belt protection outweighs the need to meet an OAN. De-designating Green Belt is a choice and not an obligation. Around 6900 homes could be delivered without any Green Belt loss, 6200 if the Dry Street site is added to the Green Belt. The inclusion of a 'Windfall Allowance' (Conc. 11\Rec. 5) would significantly increase these figures, as will the latest 'Call for Sites'.
- 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 draft OAN is based on 2011 figures only.
- 5.** Basildon's 'Natural Growth' gives rise to a requirement of 8400-8900 new homes.
- 6.** Comparing this figure (8900) 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. A circular argument is made. In one document (HGTP), BBC argues that they require further new homes to house the outside workers necessary to fill these jobs – while in another document (Employment Land and Premises Study) they argue that the large jobs total is only sustainable and necessary if 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

and so many thousands of external workers must be brought in. This assumption is made despite the borough having:

- 8000 unemployed
- Another 30,000 economically inactive
- 18,000 part-time workers
- 47% of the workforce commuting out of the borough to work.

The assumption is that if the jobs are delivered and maintained, then the proportion of the increased population falling into each of these categories will remain the same – i.e. that overall totals will increase.

It's clear that if the jobs estimate isn't achieved, then these proportions and totals increase still further.

- 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 11,900, though there are good reasons for lowering this figure.
 10. BBC makes secondary arguments that Affordable Housing requirements and recent under-provision are also factors in justifying the high OAN. The White Paper shows that these arguments are weak and that the borough's identified Affordable Housing requirement can be met, or exceeded, without a high overall OAN or Housing Target.
Note: A high target proportion of Affordable Homes lowers the overall requirements.
 11. BBC has not included a Windfall Allowance which would alleviate the pressure to designate countryside sites and would also promote urban regeneration.
 12. Unlike the previous draft Plan, the current version has no policy on housing density and so densities are likely to be lower. As a result, more land will be required to deliver an equivalent number of houses, and those delivered will be more expensive.

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, and also allow the borough to improve its commuting ratio.
 - 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.
3. Consideration should be given to TGSE's non-binding recommendation.
4. Consideration be given to a more formal policy on housing densities to ensure that, notwithstanding other considerations, land taken for housing is used efficiently.
5. Consideration be given to a Windfall Allowance within the overall OAN\Housing Target.
6. In light of infrastructure and Green Belt constraints, that consideration be given to a sub-OAN Housing Target.