



## **Analysis of Basildon's 'Objectively Assessed Need'**

### **A White Paper by Billerica Action Group**

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## Revision History

This Revision History applies to both the White Paper and its associated Summary document.

<b>Version</b>	<b>Date</b>	<b>Comments</b>
2.0	23 <sup>rd</sup> October 2014	First public release
2.1	3 <sup>rd</sup> November 2014	Incorporates a correction to terminology used. The document now refers to Castle Point's Housing Target rather than its OAN.

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## 1. Introduction and Aims

Basildon Borough Council (BBC) has proposed a Local Plan for 2011 to 2031, which centres on an Objectively Assessed Need (OAN) for at least 16,000 new homes. The Plan was developed under a new planning context introduced under the Localism Act of 2011. The Act devolves responsibility for Housing Targets to Local Authorities which are required to operate within the parameters laid out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).

Part of Westminster's aim has been to engage local communities more in the process of developing their Local Plan. Unfortunately in our borough this objective has not been achieved, in part due to the newness and unfamiliarity of the new planning context.

In a letter to the Chief Executive of the Planning Inspectorate, the then Under Secretary of State for Planning Nick Boles wrote:

*"Fundamental to the National Planning Policy Framework and to this Government's planning reforms is the idea that local authorities, and the communities who elect them, are in charge of planning for their own areas. That is why we abolished the top down regional strategies..."*

Nick Boles MP – 3<sup>rd</sup> March 2014

The quality of the local debate has been hindered by a shortage of clear information on key aspects of the Plan, and the misconceptions that have arisen from this.

So with Nick Boles' comments in mind Billericay Action Group (BAG) is publishing this White Paper with the following aims:

- To show the rationale behind BBC's Objectively Assessed Need (OAN), the most contentious aspect of the Plan.
- To demonstrate that the target was far higher than was necessary to satisfy the National Planning Inspectorate.
- To facilitate informed debate across the borough, particularly the public and their elected representatives.
- To build a case for the Housing Growth Topic Paper (HGTP) to be re-drafted in order to deliver a more moderate OAN. This re-draft should have clear 'terms of reference' which would be publically available.

A Local Authority can submit a Housing Target lower than its OAN citing constraints such as Infrastructure and Green Belt. Furthermore there is a growing body of evidence to suggest this could be acceptable to the Planning Inspectorate; for instance, the letter quoted above goes on to state that Green Belt protection can only be withdrawn in exceptional circumstances.

However it is not the purpose of this White Paper to weigh up arguments which support or undermine the case for such a Target, instead the focus here is the OAN and our Conclusions and Recommendations can be found at the end of the document.

It is important to note that this document does not represent the full extent of BAG's research into the OAN; there is more analysis available but for the sake of clarity we focus on BBC's central arguments.

## 2. Responsibilities

There has been a lack of clarity in the public debate about BBC's OAN and the leader of the Council has been quoted as saying that these figures are imposed by the Government.

BAG requested clarification from BBC on this point and others in an e-mail sent on 16<sup>th</sup> September and received the following reply in an e-mail from BBC's Planning Team on 20<sup>th</sup> October 2014.

*"The OAN is not imposed by Central Government or any other national body.*

*What Central Government does however is determine the way in which it has to be calculated by a LPA and what the variables/factors they need to consider when determining what the OAN is likely to be for the Borough, which are set out in the NPPF and Practice Guidance (also issued by the Government). It is this calculation of OAN, the variables considered and assumptions made that will be scrutinised through the Examination in Public by the Planning Inspectorate, after the Council has submitted it to the Secretary of State."*

In this reply BBC acknowledge that the OAN was not imposed, but argues that the process was.

This document we will show that the process gave BBC significant leeway in arriving at their figure and that BBC produced an OAN figure that went far beyond what was necessary to satisfy the Planning Inspectorate.

### 3. Overview of Scenarios

The current proposed OAN for Basildon Borough is at least 16,000 new homes be built by 2031. This figure was arrived at by Consultants (Edge Analytics & Turley) based on an Economic Scenario and documented in the Council's Housing Growth Topic Paper (HGTP).

The following table summarises the various scenarios considered in the HGTP and allows them to be compared to the current OAN.

Scenario	Type	Jobs	Homes – 2011 data (A)	Homes – 2008 data (B)	Homes average
Natural Change	Demographic		8920 (446 pa)	10940 (547 pa)	9940 (497 pa)
Mig-led 5 years	Migration		11220 (561 pa)	13280 (664 pa)	12240 (612 pa)
Mig-led 10 years	Migration		10880 (544 pa)	12960 (648 pa)	11920 (596 pa) <sup>1</sup>
Mig-led 5 year-10 yrs	Migration		10320 (516 pa)	12400 (620 pa)	11360 (568 pa)
Mig-led 5 years-10 yrs 80%	Migration		9740 (487 pa)	11160 (558 pa)	10760 (538 pa)
SNPP-2010	Migration \Official		13300 (665 pa) <sup>2</sup>	15520 (776 pa)	14320 (716 pa)
Experian Oct 12	Economic	12040 (602 pa)	19260 (963 pa)	21520 (1076 pa)	20400 (1020 pa)
Experian May 13	Economic	10400 (520 pa)	17840 (892 pa)	20120 (1006 pa)	18980 (949 pa)
EEFM July 13	Economic	6580 (329 pa)	14740 (737 pa)	16840 (842 pa)	15780 (789 pa)
<b>Basildon Local Plan OAN</b>	<b>Economic</b>	<b>8600 (430 pa)</b>			<b>16000 (800 pa)</b>

Table 1 - Scenarios\Projections for Basildon Housing Growth.

**Source: Derived from Figures 20 and 21 of the Housing Growth Topic Paper**

The HGTP gave each scenario an 'A' and 'B' projection. 'B' represents a housing projection based on 2008 data and 'A' represents the lower and more up to date 2011 data, based on the census of that year.

Throughout the HGTP, BBC uses the average of the two datasets but we think it more appropriate to use the most up to date figures. There is no requirement to use the average figure and the 2011 is used by other local Councils such as Brentwood.

The requirement for homes across all scenarios is significantly lower in 2011 compared to 2008, and we expect that this will be lower still when the 2011 census figures are available later in 2014. It could therefore be deduced that by using 2008 figure the number of homes required is inflated.

However the Council could not submit 8920 (2011 Natural Growth) as the OAN, as the National Planning Policy Framework (NPPF)<sup>3</sup> requires Councils to take past migration trends into account; meaning that because the town has grown, it must continue to grow.

Taking the Natural Growth figure of 8920 and comparing that with the OAN figure of a 16,000 minimum, we see that 44% of the total build will be to provide housing for newcomers to the borough.

<sup>1</sup> A slightly reduced variant of this projection is the basis of Thames Gateway's non-binding recommendation.

<sup>2</sup> This methodology is the basis of Brentwood's current OAN.

<sup>3</sup> Para 159

## 4.Scenarios and Approach which drove BBC OAN

In Planning, population projections are notoriously difficult, especially at a local level and economic projections are more unreliable still. As these two types of projection are so interrelated the degree of uncertainty is compounded.

*"...population, household or economic growth forecasts, which are dependent on so many variables and assumptions beyond the Council's control that they make it difficult to set a realistic and achievable housing target."*

Basildon Borough Council - Spatial Options Topic Paper, February 2012 (in support of Option A, the preferred option under the Old Plan)

In the HGTP, Edge Analytics repeatedly point out the subjectivity of trying to assess housing needs, for instance:

*"...due to the complexities of the housing market and the various factors and assumptions which feed into the modelling of future needs, there is no single number which can be identified as conclusively representing Basildon Borough's objectively assessed housing development needs over the plan period."*

Edge Analytics for Basildon Borough Council in section 7.29 of the Housing Topic Paper

### 4.1. Overview and origin of Scenarios

Under National Planning Practice Guidance (NPPG)<sup>4</sup>, Councils are obliged to use official statistics, represented here by the SNPP-2010 projection, as a starting point; but providing they can justify themselves they can develop refinements to this projection, for instance to include more up to date and locally relevant assumptions.

To this end, the Essex Planning Officers Association (EPOA) commissioned Edge Analytics & Turley to provide a host of Migration and Economic based scenarios for Local Authorities across Essex to use for strategic planning.

As can be seen in Table 1 above, the Migration based scenarios are significantly lower than the Official projections and the Economic based scenarios are significantly higher. BBC chose an Economic Scenario to determine the OAN.

### 4.2. Demographic and Migration based scenarios

Demographic and Migration based forecasts take current data and extrapolate trends, they tend to be lower than economic based forecasts.

#### 4.2.1. Demographic scenario - 'Natural Change'

In this scenario the following factors are set to zero:

- in-migration\out-migration (domestic out migration is usually greater than domestic in-migration)
- immigration\emigration (immigration exceeds emigration)

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<sup>4</sup> This draft advise was issued in August 2013 but does not appear to be present in current guidance.

Only births and death projections contribute towards change and as such can be considered a benchmark.

#### **4.2.2. Migration led scenarios**

A range of scenarios has been prepared which take recent migration to the borough into account and extrapolate that. These are higher than the 'Natural Change' forecasts.

- **Mig-led 5 years**  
Internal and international migration assumptions are based on the last five years of historical evidence (2006-07 to 2010-11).
- **Mig-led 10 years**  
Internal and international migration assumptions are based on the last 10 years of historical evidence (2001-02 to 2010-11).
- **Mig-led 5 year-10 years**  
Internal migration assumptions are based on the last 10 years, international migration assumptions are based on the last five years of historical evidence.
- **Mig-led 5 years-10 years 80%**  
Internal migration assumptions are based on the last 10 years, international migration assumptions are based on the last five years but reduced to 80% in line with the difference between the current national estimate (+155,000) and the existing ONS long-term assumption (+183,000).

*"A key issue in household projection is that they can be circular in their logic. Areas which have historically experienced high levels of development are likely to have also attracted many in-migrants, which leads to future projections identifying these areas as also having high levels of future growth."*

Section 8.19 of the TGSE SHMA, Dec 2013

#### **4.2.3. SNPP 2010 – the 'Official' projection.**

The SNPP is developed by the Office of National Statistics and is the starting point for determining an OAN. As previously described, authorities can commission more up to date\locally relevant information provided they make the appropriate arguments.

### **4.3. Economic\Jobs based projections**

Edge Analytics present three differing jobs based projections that they produced by taking a long-term job creation forecasts and combining them with demographic information.

This allows them to produce an estimate of how many new homes would be needed in order to satisfy the borough's natural growth and also to provide sufficient outside workers to fill the new number of new jobs that are estimated.

#### **4.3.1. Specific Economic Scenarios\Projections**

- Experian Oct 12  
12042 jobs\20400 new homes
- Experian May 13



- 10400 jobs\18980 new homes.
- EEFM (East England Forecasting Model)  
6580 jobs\15780 new homes

#### **4.3.2. Basildon's New Job Target – A Circular Argument**

The borough used the Employment Land and Premises study to try and determine what level of jobs growth it would be realistic and desirable to plan for.

The HGTP has argued that whilst we need houses for the outside workers, the Employment Study argued that we needed jobs to provide employment for the new arrivals.

This is a circular argument with no obvious end.

#### **4.3.3. Critique of the economic\jobs-based projections**

##### **4.3.3.1. Base Jobs estimate**

The foundation of Edge Analytics economic based housing projections are several very broad approximations of how many new jobs might be delivered over a twenty year period.

There is **enormous** uncertainty here though; the 20 year jobs forecast is based on an annual range of numbers – the median point of this range is taken and multiplied by twenty.

- Experian Oct 12  
Total extra jobs - 12042 (between +370 and +1320 jobs added per year, average = 602pa)
- Experian May 13  
Total extra jobs – 10400 (between -125 and +992 jobs added per year, average = 520pa)
- EEFM (East England Forecasting Model)  
Total extra jobs - 6580 (between -342 and +1236 jobs added per year, average = 329pa)

##### **4.3.3.2. Formula and Assumptions**

BBC accepted the recommendation in the HGTP for 800 new homes, based on the EEFM Scenario, with a small adjustment. However they do not appear to accept the Jobs Forecast from EEFM, instead they feed the OAN into the Experian Economic Regional Planning Model and come up with a new figure of 8,600 new Jobs.

The evidence base does not provide the formula which was used to produce the Economic projections – these are available to members of the public, but at a cost of £600.

See <http://www.basildon.gov.uk/article/4943/Evidence-Base---Settlements-and-Housing>

However the Housing Paper does refer to three key assumptions which feed these formulae:

*5.22 In modelling the potential impact of jobs growth upon demographic change, three key parameters are used: economic activity rates by age and sex; an unemployment rate for the Borough; and a commuting ratio for the Borough. Further detail on these assumptions is provided in section 4 and Appendix 1.*

*5.23 POPGROUP (Excel based software) is able to evaluate the impact of a particular jobs growth trajectory by measuring the relationship between the number of jobs in an area, the size of its labour force and the size of the resident population. Economic activity rates control the relationship between the size of the population and the size of the labour force. The unemployment rate and the commuting ratio determine the relationship between the size of the labour force and the number of jobs available.*

Crucially the Appendix of the HGTP describes the assumptions made about how the labour force will look **AFTER** the addition of these new jobs.

- While there will be a higher overall population, **the proportion** (our highlighting) of people of working age will have shrunk.
- The level of economic activity<sup>5</sup> will have increased slightly amongst the over 60s, but otherwise remains the same – ie a slight decrease in the number of economically inactive population, down from 30,500.  
An economically inactive person is unemployed but not entitled to Unemployment benefit.
- The level of unemployment would remain the same at 7.9%<sup>6</sup>, that's 8360 people<sup>7</sup>.
- The proportion of Basildon workers commuting to work outside the borough (47%)<sup>8</sup> would remain the same.

**From these assumptions, the Housing Growth Topic Paper concludes that there is little or no slack in the labour supply in Basildon.** The unemployed and economically inactive will remain so and so can't be counted as part of the labour force, similarly it is assumed that people commuting to work outside the borough won't move to a job nearer home and so can't be considered as potential workers for the new jobs.

Further problems with this argument include:

- The jobs created will generally be low-skilled jobs, to make it easier for unemployed people to fill them.

<sup>5</sup> From the 2011 census, quoted in table 19 of the Employment Land and Premises Study

<sup>6</sup> Average 2007-12, source NOMIS.

<sup>7</sup> Based on 7.9% of a workforce 105,900 strong – source Fig 68 of the SHMA

<sup>8</sup> Source, Essex Economic Assessment, quoted in table 19 of the Employment Land and Premises Study

- Even if the argument that the unemployed are not part of the labour force was sound, the figure of 7.9% is the 5 year average (2007-12) and reflects the recent recession rather than typical levels.
- In 2011 there were 17,860 part-time workers in the borough and the assumption appears to be that none of these require full time work.
- It is assumed<sup>9</sup> that 7.9% of the incomers will be unemployed and have the same rates of economic inactivity as the borough currently has.
- We can all but guarantee that 16,000+ houses will be delivered, it is much harder to guarantee that 8,600 jobs will be delivered and maintained.
- The logic behind the housing numbers identified in the Economic Scenarios is a house of cards. It will lead to a large oversupply of housing and workers in relation to jobs, and this will be very harmful to the interests of Basildon's unemployed.
- 2.20 of the Housing Topic Paper recognises that the 'Basildon Borough Community Strategy 2012-2036' (2013). This includes the objective to 'support and promote the growth in local economies and businesses to benefit **local people**'. The current assumptions dis-benefit local people.

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<sup>9</sup> An inference based on the unemployment rate being 7.9% before and after the house building.

## 5. Thames Gateway Alternative Approach

Section 3 presents the Scenarios considered and the failings of basing the OAN on an Economic Scenario. BBC were not required to deliver such high jobs growth, nor were they obliged to deliver such high housing numbers based upon it.

BAG are not alone in questioning the methodology behind the OAN. Thames Gateway South Essex (TGSE) Partnership of which BBC is a member, also have concerns, both with the methodology used and the number of new homes required.

The TGSE Partnership is made up of 5 South Essex Borough and District Councils (including Basildon) and representatives from the business community in those council areas. One of its key roles is to help local authorities co-operate on planning matters.

We have demonstrated that Economic scenarios are unreliable, as their flawed assumptions compound the problem of the uncertain economic forecasts on which they are based.

Thames Gateway shares this view:

*"...The Phase 3 EPOA projections included an economic (employment-led) scenario based on outputs from the Spring 2012 East of England Forecasting Model (EEFM) and the additional work undertaken more recently by Basildon and Castle Point considered more recent EEFM outputs from 2013 alongside alternative data from Experian. Nevertheless, given the volatility associated with such forecasts, ORS would not normally recommend these figures as an appropriate basis for projecting housing requirements at a local authority level."*

From 8.24 of the TGSE SHMA, Dec 2013

The HGTP<sup>10</sup> describes a falling *proportion* of the population being of working age and bases crucial decisions on jobs growth approximations, flawed assumptions and unpublished formula.

Thames Gateway though, take a simpler and more robust approach, noting that under their non-binding recommendation of 11,700/11,900 (see the table below) would see the number of people of working age grow faster than the anticipated number of new jobs, thus ensuring that there is (more than) enough workers to fill the jobs, even with this lower figure.

*"The consequence of the migration-led projections in relation to employment can therefore be summarised as follows:*

*» **Basildon:** the growth in economically active aged population is 1.8 times the average growth in jobs, compared to current position where the population is 1.3 times the number of jobs; ..."*

From 8.27 of the TGSE SHMA, Dec 2013

*"The migration-led scenarios would appear to provide an appropriate basis for future employment requirements in Basildon, Rochford and Thurrock..."*

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<sup>10</sup> Section 6.23

8.28 of the TGSE SHMA, Dec 2013

**Table 2 - Housing recommendations from Thames Gateway**

Source: Figure 67 of the SHMA

Local Authority	Projected household growth		Housing requirement	
	20-year total	Annual average	20-year total	Annual average
Basildon	11,700	590	11,900	600
Castle Point	2,500	130	4,000	200
Rochford	4,600	230	4,800	240
Southend-on-Sea	13,100	650	13,900	690
Thurrock	19,600	980	20,600	1,030
<b>TOTAL</b>	<b>51,600</b>	<b>2,600</b>	<b>55,200</b>	<b>2,800</b>

While the recommendation is non-binding, it is worth noting that Castle Point have taken Thames Gateway's 4000 recommendation and used it as their Housing Target.

## **6. Finding a realistic OAN and target number**

As described in section 1, the purpose of this document has not been to propose an alternative OAN, but to show that Basildon has chosen one that is unnecessarily high.

However there are alternative approaches used or proposed by other bodies and in this section they given further comment.

### **6.1. Basildon**

Councils must use the Migration based SNPP projection as the *starting point* of their work on OAN; as they are entitled to do, Basildon examined a range of EPOA\Edge Analytics refinements using an average of the higher 2008 figures and the more up to date 2011 data.

They then chose an Economic\jobs based projection which created a higher OAN and more jobs.

We have shown that this strategy will only increase migration to the Borough without any impact on overall unemployment, or indeed without guaranteeing those jobs will ever exist. They are therefore building homes in the hope they can attract more people to live in them, rather than for the borough's own need or to satisfy the Planning Inspectorate.

### **6.2. Brentwood**

Brentwood went no further than using the SNPP projection together with the latest 2011 data.

If Basildon used this approach then this would give us an OAN of 13,300. Billericay Action Group would argue that this approach would give an excessive OAN for both Brentwood and Basildon but one that is lower than the current Basildon figure.

### **6.3. Castle Point**

Castle Point have taken Thames Gateway's non-binding recommendation of 4000 homes and adopted it as their Housing Target.

### **6.4. Thames Gateway recommendation**

Thames Gateway's non-binding recommendation was for a total of 11,700 houses which they revised upwards to 11,900 in order to 'deliver the right housing mix'. This implies that the upward revision would bring the number into line with Basildon's policy of having up to 35% of homes as affordable homes.

This suggestion of 11,700 was based on a long-term migration based projection that was a slight variation of the one presented by Basildon in their Housing Paper. However this is still based on an average of 2008 and 2011 growth forecasts.

If we were to take Thames Gateway's proposed long-term migration based number of 11,700, but only use the most up to date 2011 data then this would give us a total of 10,700.

Such a refinement would mean that the 4300 affordable housing target recommended by Thames Gateway would comprise 40% of the total.

### **6.5. Other borough's OANs**

Basildon Councillors, and people throughout the borough should use the information in this document to keep an eye on the OANs and housing totals arrived at in other boroughs.

If other boroughs, such as Brentwood currently, propose excessive OANs then they are more likely to argue that they cannot accommodate their OAN and that Basildon should consider taking some of their excess.

### **6.6. Distinction between OAN and the housing target.**

As seen an OAN must be in excess of a borough's direct demographic needs – taking past migration trends into account – but also cannot take any account of a borough's capacity to meet the OAN.

A council may however submit a house building target that is below its OAN, for instance arguing that Green Belt or infrastructure constraints require a lower target, and when it does so it must have attempted to persuade neighbouring boroughs to take some of this need.

It would be desirable to submit a housing target lower than our OAN; but it is acknowledged that, to quote the Planning Inspector in the Castle Point video, this is a "high hurdle".

## **7.Windfall and the 16k minimum**

The OAN of 16k is a minimum and likely to be exceeded by some margin. One of the reasons for this is that 'Windfall' sites become available, that is non-Green Belt sites that unexpectedly become available for development. An example of this sort of site is the 350+ flats that may be developed at Trafford House. When these sites become available the council will not typically have a reason to refuse them, yet at the same time cannot de-designate the countryside sites they've included in their Plan.

With this in mind the NPPF<sup>11</sup> allows Councils to make an allowance for such sites as long as they can show that such sites have consistently become available in the past.

Councils with approved Plans which include Windfall include Bath and North-East Somerset, Wychavon and Uttlesford. Many Councils have Windfall allowances in excess of 1000.

If BBC include a Windfall allowance then this significantly reduces the pressure to designate countryside sites for development and BBC can instead reach its housing target with the urban windfall sites allowed for.

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<sup>11</sup> Para 48



## 8. Conclusions

The proposed OAN of 16,000 new homes is unnecessarily high, going well beyond the figure needed to satisfy the National Planning Inspectorate.

BBC has chosen to reject scenarios based on Natural Growth, Migration and ONS official figures. Instead they have chosen to utilise a much higher Economic Scenario, 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 leeway. 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 serves to inflate 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 then 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 16,000 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 Partnership, of which BBC is part has explicitly criticised the type of approach taken by BBC and made 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.

## 9. Recommendations

We request 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 as part of the TGSE SHMA. Castle Point adopted the recommendation made to them as their Housing Target.
  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.

## Appendix A - Sources

The principle sources of information are provided and described below:

<b>Document (and link)</b>	<b>Authors</b>	<b>Purpose</b>	<b>Notes</b>
<b>Core Strategy</b>	Basildon Borough Council	Overview of the Plan	
<b>Housing Growth Topic Paper</b>	Edge Analytics and Turley Associates for Basildon Borough Council	Presents the OAN and the arguments and evidence on which it is based.	Argues that many new homes are required to house outside workers brought in to fill the many new jobs.
<b>Employment Land and Premises Study</b>	Atkins for Basildon Borough Council	To analyse future demand for employment land in Basildon borough.	Argues that many new jobs must be created to provide work for the people occupying the large number of new houses.
<b>Strategic Housing Market Analysis (SHMA)</b>	Opinion research Services for Thames Gateway South Essex (TGSE)	Provides essential housing market research to guide strategic housing decision making. An SHMA is a compulsory part of any Local Plan and most LAs use theirs to reach an OAN. The TGSE doc provides an SHMA for the five authorities which comprise the area.	Argues that 11,900 homes would provide (more than) enough workers to fill the new jobs. This is non-binding as it is the LAs responsibility to reach an OAN.
<b>National Planning Policy Framework (NPPF)</b>	Department for Communities and Local Government	Provides a framework to guide the development of Local Plans.	
<b>National Planning Practice Guidance (NPPG)</b>	Department for Communities and Local Government	Guidance on implementing the NPPF	
<b>Owning Your Number</b>	Planning Advisory Service and partners.	Advice to Local Authorities on how to arrive at an OAN.	