



Analysis of Basildon's 'Objectively Assessed Need'

A White Paper by Billerica Action Group

Version 3.0 – 10th February 2015

Revision History

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

| Version | Date | Comments |
|----------------|--------------------------------|---|
| 2.0 | 23 rd October 2014 | First public release |
| 2.1 | 3 rd November 2014 | Incorporates a correction to terminology used. The document now refers to Castle Point's Housing Target rather than its OAN. |
| 3.0 | 10 th February 2015 | Addition of sections on Affordability, prior under-provision, density, more on Windfall and Green Belt protection. Numerous other refinements. |

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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. In addition, we will also have 2-4000 of Brentwood's homes sited on our border at Dunton and 575 of Chelmsford's homes sited on our border at Runwell. These locations may ultimately be transferred to Basildon Borough.

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 Planning Practice Guidance (PPG).

Part of Westminster's aim has been to engage local communities more in the process of developing their Local Plan. To date, this has only been partly achieved in Basildon because the debate has been limited by widespread misconceptions, notably that:

- Central Government still impose Housing Targets.
- There is a defined method for producing an OAN, with little lee-way allowed.
- The NPPF requires Green Belt to be sacrificed, if necessary, in order to meet the OAN.

The Planning Minister Nick Boles wrote (with our emphasis):

*"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..."¹*

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 OAN was far higher than was necessary to satisfy the National Planning Inspectorate.
- To show that there is no obligation to de-designate Green Belt land, not even to meet an OAN, and that therefore a sub-OAN Housing Target is permissible.
- To facilitate informed debate across the borough, particularly among the public and their elected representatives.
- To build a case for the Housing Growth Topic Paper (HGTP) to be re-written in order to deliver a more moderate OAN. This re-draft should have clear and open 'terms of reference'.

A Local Authority can set a sub-OAN Housing Target if it can cite Green Belt constraints, and this revised edition of the White Paper details how Green Belt protection need only be withdrawn in exceptional circumstances (see section 7).

The focus of the document remains the size and origin of the OAN, but alongside a range of refinements to the document, we now describe some measures the Council could take in order to ensure that a smaller area of green space is taken to meet any given OAN/Housing Target.

Our Conclusions and Recommendations are made at the end of this document.

¹ In a letter to the National Planning Inspectorate dated 3rd March 2014

2. Overview of OAN Candidates

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

The table below shows the range of 'Scenarios' considered by the Consultants, together with the final OAN figure chosen. The exception to this is the 'No Green Belt Loss' scenario which was not in the HGTP but which is included here for reference.

It is important to note, that irrespective of the OAN chosen, Basildon are not required to meet the OAN, as to do so would mean de-designating Green Belt land and building there. There is no obligation or expectation for Local Authorities to de-designate Green Belt (see 7).

Summaries of HGTP Scenarios compared and the Council's proposed OAN

| Scenario | Type | Jobs | Homes – 2011 data (A) | Homes – 2008 data (B) | Homes average |
|--|------------------------|----------------|-----------------------------|-----------------------|-----------------------------|
| No Green Belt Loss (base scenario\adding Dry Street to GB) | Constraints | | | | 6900\6200 (345\310 pa) |
| 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) ² |
| 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) ³ | 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) |
| Basildon Local Plan OAN | Economic | 8600 (430 pa) | | | 16000 (800 pa) |

Table 1 - Scenarios\Projections for Basildon Housing Growth.

Source: Derived from Figures 20 and 21 of the Housing Growth Topic Paper. The exception is the 'No Green Belt Loss' scenario which is derived from information presented in the Core Strategy

2.1. Use of outdated demographics

The HGTP gave each scenario an 'A' and 'B' projection. 'A' represents the 2011 based housing projection, rescaled for the census of that year and 'B' represents the higher, older 2008-based data.

The requirement for homes across all scenarios is significantly lower based on 2011 data, and Basildon has been shown to be one of the authorities where the 2008 figures are most at variance with the most up to date information. We expect that the 2011 based projections will be lower still when the final 2011 census figures are available in the spring of 2015.

Throughout the HGTP, BBC uses the average of the two datasets, but by incorporating the 2008 based projections, the housing requirement is inflated.

² A slightly reduced variant of this projection is the basis of Thames Gateway's non-binding recommendation.

³ This methodology is the basis of Brentwood's proposed OAN.

It is more appropriate to use the most up to date figures as local authorities such as Brentwood do. This is in line with the NPPF requirement⁴ to use relevant, up to date evidence.

2.2. Overview of Scenario selection

Many people would consider the Natural Growth requirement (8920, based on 2011 data) highly attractive. Unfortunately the Council could not submit this as the OAN as the National Planning Policy Framework (NPPF)⁵ requires Councils to take past migration trends into account (though Natural Growth could be used as a potential sub-OAN Housing Target).

This means that as the Borough has seen rapid growth, it must therefore see continued rapid growth.

As described, the OAN must, at the least, use one of the migration based scenarios. BBC went further and based its OAN on a deeply flawed Economic scenario to give an OAN of 16,000+.

By comparing the Natural Growth figure of 8920 to the Council's OAN of 16,000; it can be seen that 44% of the total build will be to provide housing for newcomers to the Borough.

2.3. Projections \Scenarios not included in the HGTP

- The latest DCLG (Department for Communities and Local Government) Household Projections will be available soon. This projection is considered the 'starting point' in determining an OAN, but others can be used, as described (see 3.1).
- It will be demonstrated (see section 7) that Green Belt is only expected to be de-designated in exceptional circumstances, and meeting an OAN is not one of them.
Therefore it is important to include a Scenario based on only building on available non-Green Belt sites, as a potential sub-OAN Housing Target. The Core Strategy document identified that approximately 6900 homes could be delivered in this way, however this includes the Dry Street development so this total should be reduced to 6200 to reflect the widespread view that this area should be added to Green Belt. Factors such as the next HELAA (Housing and Economic Land Availability Assessment) survey may see this total increase.
- Some of the housing projections are based on high estimates of jobs growth such as EEFM July 2013, so it is worth noting the prior EEFM Jobs projection (Spring 2012) was not included in the HGTP. It predicted that Basildon would be unique in Essex in seeing a contraction in jobs; with 700 lost 2011-33.
- Thames Gateway make a non-binding recommendation of 11,900 homes, based on ten-year migration trends (see 4)
- Appendix A – New Evidence, shows that more recent iterations of the projections shown here – based on more recent data and base periods – produce outputs significantly lower than the 2011 data presented above. However they have not been incorporated into the HGTP.

⁴ Para 158

⁵ Para 159

3.Detail on Scenarios which drove BBC OAN

In Planning, population projections are notoriously difficult, especially at a local level and economic projections are more unreliable still. Where these two types of projection are 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

3.1. Overview and origin of Scenarios

Under National Planning Practice Guidance (NPPG)⁶, Councils are obliged to use household projections published by the Department for Communities and Local Government (DCLG) as a starting point for assessing housing need.

The HGTP did not consider these projections, and did not state why that was. The most likely reason for that was that only interim 2011 projections were available and these had been successfully challenged by a variety of stakeholders at national level.

This is not problematic as providing they can justify it, LAs are encouraged to refine this projection, for instance to include more up to date and locally relevant assumptions⁷.

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

Additionally the Office of National Statistics (ONS) provides alternative 'official' projections – represented here by the (migration based) SNPP-10.

As can be seen in Table 1, in the previous section, the Migration based scenarios are significantly lower than the SNPP (Sub-national Population Projection) and the Economic based scenarios are significantly higher. BBC chose to use an Economic Scenario to set its OAN.

⁶ Para 015

⁷ NPPG Para 017

3.2. 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.

3.2.1. 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)

Only births, deaths and household formation projections contribute towards change and as such can be considered a benchmark.

3.2.2. 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.

It is worth noting that bodies including Thames Gateway South Essex and the Greater London Authority are among those who favour projections that are based on longer rather than shorter term migration assumptions. This is because the longer 'base' period is less sensitive to temporary variations in migration and the economy.

- **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

3.2.3. SNPP 2010 – An ‘Official’ Migration Projection.

The SNPP-10 is developed by the Office for National Statistics and based on extrapolating a five year trend.

Unlike the other projections, all produced by Edge Analytics, this projection uses out-dated mid-year estimates and takes limited account of 2011 census data.

For this reason the outputs are higher and less reliable.

3.3. 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.

It could be argued that there are many people in the borough looking for work, looking to work more hours or closer to home and that being the case there is little or no need to bring in external workers. The evidence presented in this section supports that view.

3.3.1. Specific Economic Scenarios\Projections

- Experian Oct 2012
12042 jobs\20400 new homes
- Experian May 2013
10400 jobs\18980 new homes.
- EEFM July 2013 (East England Forecasting Model)
6580 jobs\15780 new homes
- The HGTP did not present a household projection based on the prior EEFM jobs forecast from Spring 2012.
This forecast predicted that Basildon would be the weakest economy in Essex, the only one to lose jobs in the 2011-33 period.

3.3.2. 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 we need houses for the outside workers, whilst the Employment Study argued that we needed jobs to provide employment for the new arrivals living in the new houses.

This is a circular argument that justifies nothing.

3.3.3. Critique of the economic\jobs-based projections

3.3.3.1. 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 2012
Total extra jobs - 12042 (between +370 and +1320 jobs added per year, average = 602pa)
- Experian May 2013
Total extra jobs – 10400 (between -125 and +992 jobs added per year, average = 520pa)
- EEFM July 2013 (East England Forecasting Model)
Total extra jobs - 6580 (between -342 and +1236 jobs added per year, average = 329pa)

There's even further uncertainty if one looks beyond the HGTP for future jobs estimates. As discussed, the Spring 2012 EEFM estimate for Basildon's jobs growth for 2011-33 is **minus 700 jobs**.⁸

3.3.3.2. Formula and Assumptions

BBC accepted the recommendation in the HGTP for 800 new homes, based on the EEFM 2013 Scenario, with a small adjustment. However they rejected the EEFM Jobs Forecast, 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 Growth 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

⁸ Greater Essex Demographic Forecasts Phase 3 (p86), carried out by Edge Analytics for the Essex Planning Officers Association

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 activity⁹ will have increased slightly amongst the over 60s to reflect the changed pension age, but otherwise remains the same – ie a very slight decrease in the proportion of the workforce classed as Economically Inactive. Based on the current size of the workforce there are 30,500 economically inactive people in the borough and as the proportion will only reduce slightly, then even if the jobs are delivered and maintained, due to the in-migration\population growth, we will still see a significant increase in the numbers of residents classed as economically inactive.
Note: An economically inactive person is defined as unemployed but not entitled to Unemployment benefit.
- The level of unemployment would remain the same at 7.9%¹⁰, that's 8360 people¹¹ based on the current workforce, but significantly more after the planned growth.
- The proportion of Basildon workers commuting to work outside the borough (47%)¹² 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, so it will be easier for unemployed people to fill them.
- 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

⁹ From the 2011 census, quoted in table 19 of the Employment Land and Premises Study

¹⁰ Average 2007-12, source NOMIS.

¹¹ Based on 7.9% of a workforce 105,900 strong – source Fig 68 of the SHMA

¹² Source, Essex Economic Assessment, quoted in table 19 of the Employment Land and Premises Study

(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 assumed¹³ that 7.9% of the incomers will be unemployed and have the same rates of economic inactivity as the borough currently has.
- Short of a housing market crash, if we plan for 16,000+ houses, they will be built. It is much harder to guarantee that new 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 people, particularly the unemployed.
- 2.20 of the Housing Topic Paper recognises that the 'Basildon Borough Community Strategy 2012-2036' (2013) includes the objective to 'support and promote the growth in local economies and businesses to benefit **local people**'. The current assumptions would be to the cost of local people.
- What happens if Basildon plans for 8,600 new jobs, unnecessarily imports the workers as planned, but fewer jobs are delivered – or as previously predicted by the EEFM model, that the borough's employment base shrinks?

¹³ An inference based on the unemployment rate being 7.9% before and after the house building.

4. Thames Gateway Alternative Approach

Section 3 presents the Scenarios considered and the failings of basing the OAN on an Economic Scenario. BBC is not required to plan on the basis of such an optimistic jobs forecast; and even if it were, there would still be no reason 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 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 seen 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 HGTP¹⁴ 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 are (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..."

8.28 of the TGSE SHMA, Dec 2013

¹⁴ Section 6.23

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 |
| TOTAL | 51,600 | 2,600 | 55,200 | 2,800 |

While the recommendation is non-binding, it is worth noting that Castle Point are planning to take Thames Gateway's 4000 recommendation and used it as their Housing Target – though they could reduce it further if they cited their Green Belt and Flooding constraints.

5. Secondary arguments for the high OAN

BBC argue that the following considerations are secondary factors in reaching the OAN of 16,000+. It will be seen that these arguments are weak or wholly flawed.

5.1. Affordable Housing

Local Authorities (LAs) are required to have a Strategic Housing Market Analysis to identify the appropriate mix and level of Affordable and Market Housing needed in their area. Thames Gateway South Essex Partnership provided an SHMA to cover the five LAs which it covers.

5.1.1. BBC argument

The HGTP refers to the draft SHMA identifying a need for 5800-6400 affordable homes in Basildon for 2011-31.

The 2013 SHMA uses the ORS Housing Mix Model to identify a future affordable housing need of between 5,800 and 6,400 based on a selection of the household projections set out in the Phase 3 Edge Analytics Essex demographic projections report (2012). This represents a per annum need for affordable housing of between 290 and 320, noting that these are draft outputs at the time of writing and subject to change.
Section 7.19 – Housing Growth Topic Paper

It goes on to say that as BBC has a draft policy of up to 35%¹⁵ of homes being Affordable, then the draft policy and draft numbers act as a driver to the overall number required, putting the required range up to 16571-18286.

The latest draft of the Local Plan (Preferred Option, 2012) sought to deliver up to 35% affordable housing on residential development schemes. It is recognised that this is draft policy, however, in the absence of an alternative figure using this proportion, and assuming the need to deliver at least 300 affordable houses per annum this would equate to an overall per annum requirement for approximately 860 houses per annum (=300 / 0.35).
Section 7.21 – Housing Growth Topic Paper

5.1.2. Critique of BBC argument

The argument above can be quickly addressed

- The published SHMA (section 8.36) identified a requirement¹⁶ for 4300 Affordable Homes, not 5800-6400 as stated.
- It would be regrettable if a modest target proportion of Affordable Homes means the borough takes many thousands of unnecessary non-Affordable homes, with all the social and environmental impacts attendant on this.
- There are therefore, environmental as well as social benefits of having a larger target proportion of Affordable Homes.

¹⁵ Since that time BBC has adopted a policy of 36% of new housing to be Affordable – Core Policy 3

¹⁶ This calculation is based on a formula primarily based on comparing income with local rents and house prices.

5.2. Recent under-provision

BBC argues that the borough has under-delivered on housing numbers compared to the challengingly high, and now defunct centrally set targets it was previously bound by. It goes on to weigh two conflicting arguments about whether this backlog should be added to the OAN.

It concludes that it is unnecessary to add the backlog to the OAN, as due to the Economic Scenarios employed, the OAN is already far in excess of the borough's Natural Growth requirements. It goes on to argue that if a lower migration based projection had been the basis of the OAN then it would have been necessary to add the backlog (Calculated at 1534) to the total.

BAG disputes these conclusions for a number of reasons, but for the sake of brevity this White Paper presents only the main objection.

This is that the NPPF¹⁷ states that in such circumstance the delivery of Plan period homes be front-loaded with the first 5 years delivering 20% more homes (moved forward from later in the Plan period, so the overall OAN remains the same).

This is not achievable with the current 800pa Housing Target, but it can be seen that a considerably lower Housing Target can be justified and on that basis the 20% buffer can be achieved and the opportunity to deliver 384 homes at Trafford House can give further confidence.

Moving the start date of the Plan forward is another approach which might, if necessary, be used to ensure the buffer is met.

¹⁷ Para 47

6. Alternative OAN and Housing Targets

As described in section 0, 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.

Alternative approaches used or proposed by other bodies are set out below:

6.1. Basildon

Basildon examined a range of EPOA\Edge Analytics projected figures using an average of the higher 2008-based figures and more reliable, up to date 2011-based equivalents.

They then chose an Economic\jobs based projection which created an unnecessarily high OAN, with the aspiration of 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's draft OAN appears to use the SNPP-10 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 the approach is better than that taken to give Basildon's current OAN.

It's worth noting that Brentwood proposed a sub-OAN Housing Target on the grounds that Green Belt limited their available and developable land. Unfortunately Basildon objected, and partly as a result of this they now propose to meet their OAN in full, by building on Green Belt at 'Dunton Garden Suburb'.

Brentwood will be unnecessarily fulfilling their OAN by expanding Basildon.

6.3. Castle Point

Edge Analytics prepared an OAN for Castle Point which was based on an 'Economic' projection and gave a figure of 8-10,000. Castle Point rejected this and prepared an alternative OAN of 6300.

However, they propose to take Thames Gateway's non-binding recommendation of 4000 homes and adopt it as their draft Housing Target, this number coincides with the former, centrally imposed RSS (Regional Spatial Strategy) target of 200 per year.

Castle Point Council see their approach as a compromise between protecting Green Belt and meeting their OAN; though they could and should do better, as their 'Natural Growth' requirement for the 20 year Plan period is minus 320 and

they could reduce their Housing Target to 1800 (90 pa) by citing Green Belt and Flooding constraints.

It is interesting to note that despite producing a sub-OAN Housing Target; that Castle Point are designating a previously unprotected site in Canvey as Green Belt. Such a precedent will encourage Councillors seeking to permanently safeguard the Dry Street site.

6.4. Thames Gateway recommendation

TGSE'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 new homes as affordable homes.

This suggestion of 11,700 was based on a long-term migration 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 more up to date 2011 data then this would give us a total of around 10,700.

With this refinement, the 4300 affordable housing target recommended by Thames Gateway would comprise a still realistic 40% of the 10,700 total.

6.5. Basildon reaction to other LA's OAN\Housing Targets

Basildon councillors, officials and members of the public can use the information in this document to keep an informed eye on the sometimes inflated OANs and Housing Targets arrived at in other boroughs – objecting where necessary, in order to restrict the pressure on our shared environment and infrastructure.

When neighbouring boroughs propose a high OAN, they are more likely to argue that they cannot accommodate all their OAN and that Basildon should consider taking some of their need.

It is in Basildon's interest for our neighbours to choose a moderate OAN and, providing they meet their Natural Growth requirements, to submit sub-OAN Housing Targets.

It is regrettable then, that in 2013, Basildon objected to Brentwood's sub-OAN Housing Target which still satisfied that borough's Natural Growth three times over.

Table 3 - Demographic and housing figures for neighbouring Authorities – per annum

| Authority | Natural Growth | Long-term migration Usually a suitable candidate for an OAN, but other factors may legitimately increase the OAN | Annual OAN, Housing Target or draft range. |
|------------------|-----------------------|--|---|
| Basildon | 445 | 545 | 800 |
| Brentwood | 88 | 289 | <ul style="list-style-type: none"> • Draft OAN = 362 • Now withdrawn sub-OAN • Housing Target = 233 • Citing GB constraints would reduce Housing Target to around 167 |
| Castle Point | -16 | 220 | <ul style="list-style-type: none"> • Draft OAN = 315 • Draft Housing Target = 200 (TGSE recommendation) • Citing GB constraints would reduce Housing Target to 90 |
| Chelmsford | 387 | 489 | 800 |
| Rochford | 47 | 206 | 250 |
| Thurrock | 496 | 720 | Draft OAN = 950 |

Source: Greater Essex Demographic Forecasts (2011 data) and Local Plans

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 – and it can’t take any account of a borough’s capacity to meet the OAN, for instance it cannot take Green Belt or Flood Plain constraints into consideration.

At the same time, as the following section details, Green Belt remains protected and its continued protection outweighs the need to meet an OAN.

With that in mind, a Council may submit a sub-OAN Housing Target and this would be compatible with the NPPF and associated Planning Practice Guidance. If Basildon were to do this, it must first have *attempted* to persuade neighbouring boroughs to take some of this ‘Need’.

The countryside protection benefits of a sub-OAN Housing Target are obvious – while other benefits could include an improved workers\jobs ratio and an improved commuting ratio.

Castle Point’s draft Plan includes a sub-OAN Housing Target and approved equivalents include Norwich, Eastbourne, Wealden and Purbeck.

7. Green Belt protection

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)

As previously described, 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.

Unfortunately the current Plan not only presents an unnecessarily high OAN, it also intends to meet it in full; the Green Belt has not been treated as a constraint.

BBC has not explained which 'exceptional circumstances' apply to justify building 9,100 houses on Green Belt. If it is a need to meet the OAN, then NPPG (quoted above) makes it clear that this does not qualify as such a justification.

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: De-designating Green Belt is a choice, not an obligation.

8. Density

At present the BBC Plan has no formal policies on housing density. There are pros and cons to various density levels and the balance of these depends on the site.

The information presented here is intended to illustrate that there is a strong case for a more specific policy, as without that, market forces will lead to lower densities.

Higher densities correlate with Affordability, and even Market Housing not technically classed as Affordable, will be cheaper due to the smaller plot sizes.

Higher density also makes more efficient use of the land, so that less is needed to reach Housing Targets. In places where there is suitable infrastructure and public support, it may be appropriate to build high-quality, high-rise residential developments which make still more efficient use of land.

There are advantages to lower density schemes too, for instance on larger PADCs it allows green networks and generous provision of other green space, within the developed area itself.

BAG has carried out research on the locations of the ten main rural development sites (PADCs) assigned around the Borough. Few of these have been formally identified, but the locations of eight can be determined with a degree of confidence.

The research isn't conclusive, but it indicates that six PADCS have a proposed density of 17-27 dwellings per hectare (dph), while another two have a density of 40-42. If this is correct, it could be argued that the land will not be used efficiently.

The following are examples of locally relevant approaches:

- Previous Basildon Draft Plan
Aspiration for a density of around 40 on Greenfield sites and 50 or more in already built-up areas.

- Thurrock
Thurrock's Core Strategy includes the following aims:

"Within the Borough's Town Centres, Regenerations Areas, key flagship schemes and other areas with high public transport accessibility, the Council will, subject to other development plan policies, seek to secure a minimum density of at least 60 dwellings per hectare. Outside of these areas, a density range of between 30 and 70 dwellings per hectare will generally be sought"

- Brentwood Draft Plan
The Brentwood Draft Plan includes a policy similar to that previously proposed by Basildon. Interestingly their SHLAA (Strategic Housing Land Availability Assessment) of October 2011, characterised density levels as shown:
 - High: 80+ dph
 - Medium: 40-80 dph
 - Low: 30-50 dph (the overlap allows subjective judgement)
 - Very Low 20-40 dph (note the overlap, as above)

It should be noted that this categorisation may be influenced by Brentwood's desire, at the time of writing anyway, to maximise urban development in order protect Green Belt.

9. Case for a 'Windfall Allowance'

As described, BBC has developed an unnecessarily high OAN of at least 16,000 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 6900, though that includes the Dry Street site) and then identified Green Belt sites which it could de-designate 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).

9.1. 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.

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.

9.2. Windfall Allowance

The NPPF¹⁸ 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 de-designated 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 16,000.

The latest Plan makes no allowance for Windfall. BBC argues¹⁹ against an allowance, viewing it as a "last resort", however this is not how it is viewed by the Planning Inspectorate who wrote to Brighton and Hove Council on 13th December 2013 saying "The Council should investigate whether or not it would be appropriate to make an allowance for windfall sites"

Since Basildon does not have a Local Plan, all recent developments can be considered as 'Windfall', and in 2009-14 this amounted to an average of 568 gross completions per annum. There are several reasons why we could not aspire to an Allowance of such a magnitude, however it does give confidence that Basildon could include a still very large Windfall Allowance.

Councils with approved Plans with large windfall allowances include Chelmsford, Bath and North-East Somerset, Wychavon, Uttlesford and Reigate and Banstead. Many councils allow for more than 1,000 houses to be supplied through Windfall. Including a Windfall Allowance would significantly reduce the

¹⁸ Para 48

¹⁹ Paragraph 71 of the Methodology for the Basildon SHLAA 2013

pressure to designate countryside sites for development. BBC could then reach its Housing Target more comfortably.

9.3. 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 16,000 minimum.

9.4. Hypothetical Scenarios

In these scenarios, Basildon develops an OAN of 10,900, based on long-term migration trends. However, it decides to deliver a sub-OAN Housing Target based on Natural Growth; around 8900.

BBC first identifies what Non-GB land is available and concludes that 6200 homes could be delivered from Non-Green Belt land, the figure being reduced from 6900 as it has decided to designate the Dry Street site as Green Belt.

This means that Basildon needs to identify land for the remainder by de-designating Green Belt land and potentially also by including a Windfall Allowance that would reduce or remove the need to de-designate Green Belt.

9.4.1. With a Windfall Allowance

In this scenario BBC examines past availability of Windfall sites and concludes that a 1000 Windfall Allowance is appropriate, and includes a 1000 Windfall Allowance within its overall sub-OAN Housing Target.

Therefore BBC only needs to identify and de-designate enough Green Belt land for 1700 homes (6200 non-GB + 1700 GB + 1000 WA = 8900).

As fewer Greenfield sites are available, developers are incentivised to invest in urban regeneration projects and this means that 1200 Windfall sites are developed over the 20 year period.

The 1700 Green Belt homes are still developed, as well as the 6200 urban sites initially identified and the 1200 urban Windfall sites. 9100 homes in total.

9.4.2. Without a Windfall Allowance

In this second scenario BBC does not include a Windfall Allowance, despite the evidence suggesting that a 1000 Windfall Allowance is justifiable.

Therefore BBC needs to identify and de-designate enough Green Belt land for 2700 homes (6200 non-GB + 2700 GB = 8900).

As more Greenfield sites are available, developers are not incentivised to invest in urban regeneration and this means that only 800 homes are developed on Windfall Sites over the 20 year period.

The 2700 Green Belt homes are still developed, as well as the 6200 urban sites initially identified and the 800 urban Windfall sites. 9700 homes in total.

10. 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 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 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. The National Planning Policy Framework and Planning Practice Guidance describe how continued Green Belt protection outweighs the need to meet an OAN. Around 6900 homes could be delivered without any Green Belt loss, 6200 if the Dry Street site were added to the 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 draft 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 (Housing Growth Topic Paper) 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 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 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. If the jobs estimate isn't achieved then these 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 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. 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 the need for 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 the homes delivered will be more expensive.

11.Recommendations

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 propose the Terms of Reference require 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 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 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 the inclusion of a Windfall Allowance within the overall OAN.
 6. In light of infrastructure and Green Belt constraints, that consideration be given to a Housing Target lower than the OAN.

Appendix A – New Evidence

Since the HGTP was produced:

- The latest DCLG Household Projections will be available soon. This projection is considered the 'starting point'²⁰ in determining an OAN, but others can be used, as described (see 3.1).
- More up to date iterations of available projections have been released through Phase 6 of the Greater Essex Demographic Forecasts.

The updated projections imply a lower requirement for housing than the iterations included in the HGTP and it is expected that future releases, that make full use of the final 2011 census data, will demonstrate a still lower requirement for housing.

The table below shows how the predicted 'Natural Growth' requirement has changed, it also shows how two equivalent Migration-based projections now show a lower requirement.

| Projection | HGTP and White Paper | Latest 'Phase 6' data |
|-------------------------|----------------------|-----------------------|
| Natural Growth | 8920 (446 pa) | 8440 (422 pa) |
| 10-year Migration trend | 10,880 (544 pa) | 10,380 (519 pa) |
| SNPP | 13,300 (665 pa) | 12,260 (613 pa) |

A continuation of the decline in the 'Natural Growth', combined with a likely increase in the amount of non-Green Belt housing potential (including Windfall sites) may mean it becomes possible to meet 'Natural Growth' requirements without developing on any Green Belt.

²⁰ Para 0030 NPPG

Appendix B – Responsibility for Housing Targets

Since Basildon's latest Local Plan was released for consultation, senior Basildon councillors have muddied the waters by claiming that Housing Targets are still imposed by Central Government. More recently we have seen senior Brentwood councillors make the same implication.

For the avoidance of doubt:

"The numbers ... in the Local Plan are not Government driven targets. The Government has made it clear that it is up to local Councils to determine the need for housing in their local area and to act appropriately to fulfil it"

John Baron MP – 3rd November 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."

Basildon Planning Team – 20th October 2014

In this reply BBC acknowledge that the OAN was not imposed, but argues that the process was. In this document BAG has shown that the NPPF and Practice Guidance gives considerable leeway when developing an OAN and Housing Target, especially to a borough like Basildon which is set in a Green Belt.

Appendix C - Sources

The principle sources of information are provided and described below:

| Document (and link) | Authors | Purpose | Notes |
|--|---|--|--|
| Core Strategy | Basildon Borough Council | Overview of the Plan | |
| Housing Growth Topic Paper | 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. |
| Employment Land and Premises Study | 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. |
| Strategic Housing Market Analysis (SHMA) | 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. |
| National Planning Policy Framework (NPPF) | Department for Communities and Local Government | Provides a framework to guide the development of Local Plans. | |
| National Planning Practice Guidance (NPPG) | Department for Communities and Local Government | Guidance on implementing the NPPF | |
| Owning Your Number | Planning Advisory Service and partners. | Advice to Local Authorities on how to arrive at an OAN. | |
| Greater Essex Demographic and Household Forecast Modelling Phases 1 and 2 Phase 3 Phase 4 Phase 5 Phase 6 | Edge Analytics for Essex Planning Officers Association | To provide LAs in and adjoining Essex with demographic statistics and projections which help provide a common methodology to support Planning. | |