

1. The Local Planning Process – BAG's Layman's Guide

- Billericay is part of the Borough of Basildon.
- Local Authorities such as ours are encouraged and increasingly expected, to prepare a Local Plan to determine and manage the delivery of housing, employment land and other elements over a 15-20 year period.
- Local Plans must be in accordance with central government policy and guidance (the NPPF and PPG)
- Basildon Borough Council is preparing a 'Local Plan' over the period 2014-34.
- The most important part of this is the Housing Target Basildon sets itself.

This will have an impact on every Billericay resident.

2. What is a Local Plan?

In 'Layman's Terms', a Council must do the following in producing a Plan:-

1. Assess the "Objectively Assessed Need" (OAN) for housing in the Borough by planning proactively for sustainable development in our community over the next 15 – 20 years.

The term 'Need' is misleading as the figures must go beyond local need and include a greater or lesser allowance for migration from other areas.

The allowance for migration in Basildon's OAN is extreme.

Basildon's OAN is 15260 but Local Needs are only 9600. Therefore at least 37% of new homes will be for people outside the borough.

2. A council should normally meet its OAN unless constraints such as the following are used. These may include:-
 - a. The availability of suitable land taking account any desire to maintain the Green Belt – if the area is lucky enough to have it;
 - b. The capacity of the infrastructure (transport, education, health services, communications, water, sewage, drainage, energy, waste, emergency services, recreation);Citing constraints would lead to a lower, sub-OAN "Housing Target" for the borough.

Basildon is under no obligation to give up any Green Belt.

Many voters would prefer to see a Plan with no Green Belt loss and many others would prefer a plan with only small-scale loss.

2. Evaluate & propose where and when land in the Borough can be made available for both business and housing development.

3. Formally consult the Borough's residents and take account of the views conveyed.
4. Submit the Draft Local Plan to The Planning Inspectorate for examination in public.

Note: Basildon Borough Council will consult on its Draft Local Plan early in 2016

2.1. Mythconceptions

2.1.1. We must give up Green Belt to meet OAN

A Local Plan is the only opportunity a Council has to remove land from Green Belt – however local authorities are not required to remove land from Green Belt even if that means OAN is not met.

Basildon can use Green Belt, transport, flooding or other constraints to justify a housing target lower than its OAN.

Basildon Councillors have expressed scepticism that we could, in practice, cite GB as a constraint. However the draft plan (page 25) provides a 'no Green Belt loss' option which seems to reluctantly acknowledge this.

Extensive evidence for the legitimacy of using Green belt as a constraint is provided in LINK (its below)

2.1.2. A bad plan is better than no plan

Basildon have been eager to get a Local Plan in place as soon as possible as they feared that without they would be unable to resist planning applications on Green Belt.

This was an understandable fear, but the NPPF has been in place a few years now and it is clear that the Secretary of State will overturn appeals from developers against local councils rejecting Green Belt developments even where there is no Plan or 5-year Housing Supply.

Local examples include Little Chalvedon Hall (Pitsea\Bowers Gifford), Ramsden Bellhouse, Church Street (Gt Burstead) and Agnes Drive (Noak Hill).

2.1.3. We need to hurry or the government will impose a Plan

The government have stated that they may take over management of the Local Plan process for authorities that have not progressed their local Plan process by 2017. This perceived threat may be used as a justification for a swift Local Plan process which has the maximum possible chance of getting past the Inspector first time.

- The government has said that any intervention would be in consultation with local communities. Given the evidence provided here, it would be politically very hard to de-designate large areas of Green Belt, even if they wanted to.
- Do they have the resources and political will to impose harsh draft plans on communities and then risk them getting rejected by the Planning Inspectorate?
- Would it be the government impose a plan as harsh as one based on the current, unnecessarily high OAN?

The last central government housing target for Basildon in 2011 – before these were abolished – was 530 per annum, much lower than the current target Basildon has set itself.

- The government may stay out – two consultancies, Boyer and Barton Willmore doubt that the government will step in where Green Belt reviews are a core issue.

<http://www.planningresource.co.uk/article/1373321/housing-need-studies-mean-south-east-green-belt> (subscription required)

3. An Overview of OAN and other Relevant Numbers

All numbers presented here are based on the Greater Essex Demographic Forecasts - Phase 7; the same source as that used to prepare the proposed OAN. The exception is the baseline figure below, the approximate number of homes which could be built without building on Green Belt or other protected sites.

Note: Basildon currently has 74,000 homes, and those delivered as part of the Plan may be joined by many more that are technically outside our boundaries but to all intents and purposes part of our towns.

These are the 4000 Brentwood wish to build on their side of the potential Dunton Garden Suburb and the 585 permitted by Chelmsford at Runwell Hospital on the edge of Wickford.

3.1. Baseline: Minimum Housing Target

No loss of Green Belt or Dry Street, approx **7000 – 8700**

In practice, this figure will be the minimum the Council can submit as a Housing Target. It will be below any potential OAN and comprises:

- The Council identified land sufficient to provide **6700** homes in 2014-34, without building on GB or Dry Street. It is acknowledged that this figure includes the loss of parkland such as Ballard's Walk – the NPPF allows us to protect these sites as 'Local Greenspace' too though this would reduce the 6700 figure down.
- The Council should include a 'Windfall Allowance' (see section N) of approximately **750 - 2000**.

The NPPF recognises that over a Plan Period, brownfield sites will become available which could not have been foreseen at the start of the Plan Period. These are referred to as 'Windfall' and Councils can include an allowance for these unforeseen opportunities to count towards their site allocations.

As Basildon has lacked a Plan for some time, nearly all recent new homes could be described as 'Windfall' – around 350 per year over the last 10 years. We couldn't allocate a Windfall Allowance of that size but comparisons with other authorities suggests that an Allowance of 750-2000 is both conservative and realistic.

Both of these figures will be influenced by the density policies the council determines.

Early indications are that Basildon has not included a Windfall Allowance and this threatens urban regeneration and means more green sites must be sacrificed to meet their OAN (or Housing Target if they decide on a sub-OAN Housing Target)

3.2. Natural Growth - **9600**

The number of homes which Basildon residents and their children require over the next 20 years is **9600**.

Building more than this number means we will be building to take some of London's housing shortfall, as we have done in the past.

It is acknowledged that if we were to build this many then difficult choices about green spaces would almost certainly have to be made, but nothing like the scale currently proposed.

3.3.Objectively Assessed Needs - **15260**

An OAN must go beyond Local Needs and include a migration element.

An OAN based on extrapolating past migration to the borough would produce an OAN in the 11,200 - 13,200 range (though Basildon can find reasons to adjust this up or down). On this basis a 2013 study made a non-binding recommendation of 11,900 homes, but Basildon did not adopt this as their OAN.

Commissioning an OAN is an open question and can result in a wide range of numbers depending on the approach taken, the Terms of Reference are absolutely essential. Unfortunately, BAG's understanding is that Basildon did not contribute to the terms of reference and so presumably these were set by Castle Point who managed the commissioning of the Strategic Housing Market Analysis on behalf of Basildon, themselves and the three other authorities that make up the Thames gateway South Essex area.

The sections below describe how Basildon has taken a radical approach going far beyond extrapolating past migration to produce an extremely high OAN.

3.3.1.2014 OAN – 16,000 (abandoned)

In 2014 Basildon released a study by Turley associates which recommended an OAN of 16,000. Billericay Action Group released a White Paper analysis of this work which showed that figure was based on accelerated migration which was designed to boost business by supplying a large workforce.

Summary:

http://www.billericayactiongroup.org.uk/uploads/1/9/2/6/19263993/oan_briefing_3v0.pdf

White Paper: http://www.billericayactiongroup.org.uk/uploads/1/9/2/6/19263993/oan_white_paper_3v0.pdf

The proposed OAN was based on an "Economic Scenario". Such scenarios take a broad estimate of how many jobs might be created in the borough over the next 20 years as their foundation.

- a. A circular argument was made. In one document BBC argued 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 forecast is only sustainable and relevant if it is assumed a very large number of houses will be built.
- b. In determining the number of new homes required to house the new workers, Basildon made 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 was 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 was that if the jobs are delivered and maintained, then the proportion of the increased population falling into each of these categories will remain the same – i.e. that overall totals will increase. It was clear that if the jobs estimate wasn't achieved or maintained then the proportions and totals increase still further - there would be a reduced jobs to worker ratio and wages will fall due to the increased competition.

3.3.2.2016 OAN – 15,260

BAG has yet to carry out detailed analysis of the OAN as the documents detailing the rationale have yet to be published. However early indications are that the new OAN has been produced on a broadly similar basis to the 2014 equivalent.

3.3.3. Consequences of meeting full OAN

BAG urges Basildon Council to adopt a sub-OAN Housing Target citing constraints such as Green Belt or our strained local and regional transport infrastructure.

We do not have a position on exactly how many homes should be built – individual supporters will have their own view - however to build the full OAN would have severe social, economic, environmental and 'quality of life' consequences.

The social consequences would arise mainly from the high risk of a reduced jobs to worker ratio and the associated joblessness and reduced wages.

The economic consequences are due to an overstretched regional infrastructure discouraging people from remaining in well paid jobs in London and discouraging some businesses from investing here.

4. Detail on proposed OAN – to follow

More information on this will follow after the relevant information is published.

The OAN is very similar to that produced in 2014 and BAG's White Paper and associated Briefing Summary document showed that this figure was unnecessarily high and was based on boosting business by providing an oversupply of cheap labour.

Summary:

http://www.billericayactiongroup.org.uk/uploads/1/9/2/6/19263993/oan_briefing_3v0.pdf

White Paper: http://www.billericayactiongroup.org.uk/uploads/1/9/2/6/19263993/oan_white_paper_3v0.pdf

Meeting an OAN based on such a foundation would cause great social harm and would also damage Basildon's economy by overloading a rail and road network which is already struggling to cope.

5. We don't need to give up Green Belt

Councils need not meet OAN if constraints such as Green Belt, transport and flooding prevent it.

This section aims to prove that Green Belt is a legitimate constraint and so does not deal with other constraints such as transport. However it's worth noting that one of the reasons for the creation of the Green Belt was to prevent the population of London's periphery and its inner commuter zone from growing larger than its infrastructure could handle. The severe limitations on roads and railways locally, and around much of London, mean this rationale is as important as ever.

This section presents evidence to support the contention that Green Belt is a legitimate constraint and concludes with detail on relevant aspects of the National Planning Policy Framework and Planning Practice Guidance.

Basildon Councillors have expressed scepticism that we could, in practice, cite GB as a constraint. However the draft plan (page 25) provides a 'no Green Belt loss' option which seems to reluctantly acknowledge this. This section is aimed at reinforcing that a sub-OAN housing target based on Green Belt (complete protection or small scale release) is a realistic and legitimate option.

5.1. Eric Pickles to Dunton campaigners

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

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



5.2. Letter from Eric Pickles

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

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

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

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

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

5.3. Central Government criticises LA Officers

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

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

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

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

5.4. Ministerial Statement in Parliament

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

Brandon Lewis MP 5th March 2015.

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



The same point has been made by ministers in parliament one more than one other occasion

5.5. Planning Inspector visit to Castle Point

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

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



5.6. Castle Point Councillors and Officers visit Parliament

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

Councillors left with confidence that they need not develop Green Belt.
<http://www.rebeccaharris.org/news/minister-confirms-green-belt-can-be-protected>.



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

No government housing targets

THE Echo regularly reports that the Government is requiring Castle Point to find sites for 4,000 homes.

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

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

However, it is the council's choice, not something the Government will impose, as was the case under the old planning law, before the coalition planning law changes.

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

REBECCA HARRIS MP
Green Road
Benfleet

5.8.NPPF\PPG

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

It goes on to say that (our emphasis):

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

Planning Practice Guidance further clarifies this:

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

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

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

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

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

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

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

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

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

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

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

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

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

5.10.Reasons why this evidence may be questioned – and our response

5.10.1.Little Chalvedon Hall Case

In 2012, Meridian Homes made a planning application for 750 homes on Green Belt land near Little Chalvedon Hall between Pitsea and Bowers Gifford.

As Basildon had no Plan it was fearful that it would not be able to refuse the application, but it was steadfast and so the developer appealed to the secretary of state. When this happens a Planning Inspector looks at the case on his behalf and makes a recommendation.

In this case the Planning Inspector backed Basildon ([Inspectors Report](#)) but ambiguous comments in her judgement (sections IR 65 and 67) were interpreted by Basildon as meaning Basildon would need to give up Green Belt as part of its Local Plan.

"The three generic harms (inappropriateness, loss of openness and countryside) are inevitable somewhere in the Borough if the demand to provide for the objectively assessed housing needs of the area is to be met by whatever means."

Katie Peerless – Planning Inspector

This (and the passing remarks on the subject) are ambiguous and have been allowed to muddy the water. Our response is to state that Green Belt would certainly have to be given up in order to meet OAN, however as a Green Belt authority we don't have to meet OAN.

The secretary of state agreed with her decision to back Basildon and every aspect of her decision, but made some ambiguous exceptions relating to the new Planning Guidance released in March 2014, after the report was finalised. This new guidance including strengthened Green Belt protection by further clarifying that Objectively Assessed Needs do not have to be met if Green Belt or other constraints prevent it.

"The Inspector recommended that the appeal be dismissed and planning permission be refused. For the reasons given below, the Secretary of State agrees with the Inspector's conclusions, except where stated, and agrees with her recommendation..."

...The Government published new planning guidance on 6 March 2014 after the close of the inquiry. The Secretary of State notes that this

supersedes some of the Circulars and planning guidance that were previously relevant to this case... ”

James Henderson on behalf of Eric Pickles

5.10.2.Unsuccessful 2012 draft Plan

In 2012 Basildon prepared a draft plan which avoided Green Belt loss but were advised by a Planning Inspector that the draft was unsound. This discouragement may be part of the reason why they doubt they can use Green Belt as a constraint now.

Basildon was in a difficult position as they were preparing a Plan at the same time as the new NPPF was being drafted. For that reason the draft did not specify an OAN, nor did it explicitly state – as it must, that it was using Green Belt as a constraint to meeting OAN.

5.10.3.GB Protection not yet tested

It has been argued that these arguments have not been tested in front of a planning inspector.

It is true that since the NPPF’s recent introduction that no Local Plans have been passed that do have used GB as a constraint to meeting OAN, though to our knowledge none have been put forward.

We include Basildon’s 2013 draft Plan in this as BBC were under the disadvantage of producing this at the same time the NPPF was being developed, and while aware of the general principals did not have enough information to specify an OAN and so only implicitly expressed the constraints to meeting the non-specified OAN.

The point is fair, but it should be noted that:

- The NPPF was only introduced in 201 and plan making is a lengthy process
- The guidance clarifying Green Belt protection is still more recent than the NPPF itself.
- Plan making has slowed since the introduction of the NPPF and relatively few authorities have put Plans though the whole process.
- There are only a handful of authorities who, like Basildon, are lucky enough to have all\nearly all of their countryside in Green Belt. Even fewer peers have been through the process.
- As of March 2014, fifteen local authorities have approved local plans with sub-OAN Housing Targets. Some of these are based on environmental constraints such as AONB, which unlike Green Belt is not explicitly mentioned in the NPPF\PPG.

5.11.No need for haste

The government have stated that they may take over management of the Local Plan process for authorities that have not progressed their local Plan process by 2017. This perceived threat may be used as a justification for a swift Local Plan process which has the maximum possible chance of getting past the Inspector first time.

- The government has said that any intervention would be in consultation with local communities. Given the evidence provided here, it would be

politically very hard to de-designate large areas of Green Belt, even if they wanted to.

- Do they have the resources and political will to impose harsh draft plans on communities and then risk them getting rejected by the Planning Inspectorate?
- Would it be the government impose a plan as harsh as one based on the current, unnecessarily high OAN?
- The government may stay out – two consultancies, Boyer and Barton Willmore doubt that the government will step in where Green Belt reviews are a core issue¹.

6. Transport as a constraint – to follow

Basildon borough has a severely stretched transport network, in particularly its major roads (A127 and A13) and its railways lines into London.

The severe consequences of further overloading these mean Basildon has a strong case for arguing that transport is a legitimate constraint to meeting Objectively Assessed Needs and that we should prepare a lower housing target.

7. Windfall Allowance

Basildon has developed an unnecessarily high OAN of at least 15,260 which it chooses to meet in full.

To meet this figure, it has first identified what could be delivered using currently available non-Green Belt sites (around 6700) 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).

7.1. 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.

7.2. Windfall Allowance

The NPPF 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 15,260.

Basildon has in the past argued 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".

The term 'last resort' is inappropriate as it implies that OAN must be met at all costs.

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

7.3. 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 15,260 minimum and would still impact on our transport network.

8. Duty to co-operate

The NPPF (National Planning Policy Framework) places local authorities under a duty to co-operate with each other.

So when Brentwood Borough Council approached Basildon with their Dunton Garden Suburb proposal, Basildon were obliged to look into it.

Similarly, if Basildon produces a sub-OAN housing target we must ask our neighbours if they will take the difference, and they will be under a duty to consider this. If Castle Point produce a sub-OAN Housing target we must similarly consider taking some of their excess.

But planning guidance makes clear that Duty to co-operate is not the same as 'Duty to agree'. Local authorities can say 'No'.

Crucially, this means that if we produce a sub-OAN housing target but none of our neighbours will take the difference, it makes no difference, the Plan is legitimate as long as we can show we tried.