

Basildon Borough Local Plan 2014-2034
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INSPECTOR'S INITIAL QUESTIONS

First of all, this note confirms that after a lengthy hiatus, and the submission of additional evidence by the Council in response to the Ministerial Direction received from DEFRA in June 2019, relating to concerns around air quality, the Examination is hereby resumed.

An initial analysis of the Basildon Borough Local Plan 2014-2034 as submitted (referred to hereafter as the Plan), has raised questions about the soundness of the approach to three particular aspects. It may be that the answers to these questions are simple (and apologies in advance if I have missed something that is clear from the evidence base), but it is important that they are answered in a satisfactory way before the Examination can proceed on to more detailed aspects of the Plan.

At this point I am seeking a written response to these questions from the Council only, with a pointer as to where in the evidence, I can find the basis for the answers. It may be that the written response leads to a need for Preliminary Hearings and if that is the case, submissions can be invited from others with an interest.

If the written response suffices, for my preliminary purposes, then it would be my intention to proceed to Main Hearings, where these subjects will, no doubt, be raised again. Others with an interest will have the opportunity to raise their own related issues at that time.

1. Housing Need and the Approach to its Provision

- 1.1 The Plan sets an Objectively Assessed Need (OAN) over the Plan period of 19,491 – 19,771 dwellings. However, the Plan only provides for 17,791 dwellings over the Plan period (or 90% of the OAN). **Question 1**, put simply, is why does the Plan not seek to meet the OAN in full?
- 1.2 It is not altogether clear that the Sustainability Appraisal (SA) has tested meeting the OAN in full. **Question 2** is why not?
- 1.3 Moreover, the decision has been taken that only 15,465 dwellings of the 17,791 provided for (or put in another way, 78% of the OAN), will actually come forward by 2034 due to what are termed 'concerns about delivery'. **Question 3** is what are those concerns and how is this approach justified?
- 1.4 Linked to that, in a way, the Plan's trajectory suggests that housing delivery will be at the rate of 622 dwellings per annum (dpa) to 2023, 688 dpa between 2023 and 2028, and 1,111 dpa between 2028 and 2034. **Question 4** is what is the justification for underdelivering (and thereby not providing for a five-year supply of deliverable housing sites) in the early stages of the Plan? Following on from that, is the provision of 1,111 dpa in the later stages realistic?

- 1.5 It is recognised that the Plan seeks to take land out of the existing Green Belt (GB) to provide for housing. **Question 5** is, if land is to be taken out of the GB to provide for housing, why has more land not been proposed for GB release to meet the OAN in full? In other words, why has the threshold for GB release been set where it has been set?
- 1.6 Linked to that, my **Question 6** is why, in deeming land to be suitable for GB release, have the sites been selected in the way they have? Why is the majority of them (it seems) around Billericay rather than elsewhere?

2. The Duty to Co-operate

- 2.1 It is clear that there has been extensive consultation with the other authorities in the Housing Market Area (HMA) and various Statements of Common Ground (SoCGs) agreed. The reliance on the emerging South Essex Plan (SEP) to deal with shortfalls in housing provision against OAN across the HMA is noted and I have no specific questions about that, at this stage.
- 2.2 However, questions have been raised about the relationship between the new settlement in the GB, proposed by Brentwood BC in their new Local Plan, currently under Examination separately, and Basildon, including the Green Belt release proposed to the west of the town that forms part of the Plan. **Question 7** is whether any specific liaison has taken place with Brentwood BC about the spatial relationship that would result? Has the impact on the GB, and its purposes, been assessed?

3. Provision for Gypsies and Travellers and Travelling Show-People

- 3.1 A revised Gypsy and Traveller Accommodation Assessment (GTAA) was submitted by the Council and added to the evidence base during the suspension of the Examination. The previous evidence base identified a need for 47 pitches for Gypsies and Travellers and 3 plots for Travelling Show-People in the Plan period. However, while the Plan as submitted set out to meet the needs of Travelling Show-People (on my reading), it did not plan to meet the needs of Gypsies and Travellers, with a significant shortfall between proposed provision (15 pitches) and need (47 pitches).
- 3.2 The revised GTAA identifies a need for plots for Gypsies and Travellers in the Plan period that has almost doubled. However, as things stand, the Plan fails to address the significant shortfall between need and provision, and there is no satisfactory indication that this is a matter that can be left to the SEP. My **Question 8** is whether approach this can be justified?

There is no formal timetable for the Council to deal with these questions. However, I would hope to be in possession of a response by 31 January 2021. Obviously, the sooner answers are provided, the sooner decisions can be made about the way forward with the Examination.

Paul Griffiths
INSPECTOR
15 December 2020