

Basildon Borough Council

**BASILDON BOROUGH LOCAL PLAN (2014-2034)
EXAMINATION IN PUBLIC**

RESPONSE TO THE INSPECTOR'S INITIAL QUESTIONS

29 JANUARY 2021

HOUSING NEED AND THE APPROACH TO ITS PROVISION

Q1 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?

1.1. The Council was not able to identify through rigorous assessments sufficient land to meet the Borough's OAN in full when preparing the Submission Local Plan. The maximum capacity identified through sites that were deemed to be suitable, deliverable and developable was 17,791 dwellings.

1.2. The Council's starting point was to assess the capacity of sites that are deliverable and developable within the boundaries of existing urban areas identified by the sustainable development strategy and settlement hierarchy that is specified by Policy SD2 ("urban capacity"). The submission local plan drew this information from the HELAA 2018. The capacity was ultimately judged to be 9,179 dwellings including commitments, post 2014 completions and windfall. That left a shortfall of 10,592 dwellings compared with the OAN of 19,771 dwellings, which had to be found outside the urban area in the Borough or in neighbouring districts

1.3. Consultation with neighbouring districts under the duty to cooperate established that they were unable to help meet any part of Basildon Borough's shortfall.

1.4. On that basis the Council concluded that there were exceptional circumstances which justified a search for sites in the Metropolitan Green Belt (which washes over the whole of the Borough), subject to it being established that any alteration of its boundaries should not prejudice the objectives and purposes of the Green Belt, and that in all other respects land proposed for development should be deliverable or developable in the sense that it is free from significant constraints, or there is a realistic prospect it could become developable over the plan period.

1.5. The site search exercises considered sites in 22 broad locations and ultimately resulted in the identification of deliverable and developable land capable of accommodating about 8,612 dwellings on Green Belt sites. That resulted in a shortfall of 1,980 dwellings.

1.6. Objectors have proposed the development of other land ("Omission Sites"). These were evaluated alongside other sites identified by the Council in December 2017 and March 2018. The Council gave further consideration to them and the draft Green Belt allocations in June, July and August 2018. This process is summarised in full in the [Housing Options Topic Paper 2018 \[EV010\]](#). The extensive work carried out has concluded that the boundaries of the Green Belt cannot be adjusted to deliver more dwellings from this source than is identified in the submission version of the plan. Objectors disagree with this conclusion.

1.7. However, since submission the Council has published a further land and urban capacity study for Basildon Town Centre which reflects the NPPF 2019's increased emphasis on the greater role for residential development in town centres, making effective use of land and increased density. This identified the potential to deliver at least 4,200 new homes in Basildon Town Centre in addition to the 940 net new homes delivered in the plan period up to March 2020. This represents a net increase of 3,012 compared with the urban capacity identified in the Regulation 19 Submission Local Plan. It is also compliant with the strategy of Policy SD2. Consequently, the Council is now confident it can meet the OAN without adjusting the boundaries of the Green Belt more extensively than is indicated in the Submission Local Plan.

Q2. It is not altogether clear that the Sustainability Appraisal (SA) has tested meeting the OAN in full. Question 2 is why not?

2.1 Regulation 12 of the Strategic Environmental Assessment (SEA) Regulations (SI 2004 No. 1633) states that:

“(1) there an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.

(2) The report shall identify, describe and evaluate the likely significant effects on the environment of—

(a) implementing the plan or programme; and

(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.”

2.2 The Government's Planning Practice Guidance (PPG) (Paragraph: 018 Reference ID: 11-018-20140306) states that:

“The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted.”

2.3 The PPG goes on to explain that:

“Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan.”

2.4 It is clear from the SEA Regulations and the Planning Practice Guidance that in order to be considered for SA/SEA, alternatives need to be “reasonable”. Alternatives that are not reasonable include those that are not “realistic”. To be reasonable, realistic alternatives need to be deliverable. If they are not deliverable, they are not realistic and therefore they are not reasonable.

2.5 The SA Report [SUB006] documents the appraisal of the following scales of development considered to be deliverable and therefore reasonable in SA terms at the time.

There were three high-level growth options considered during the development of the Basildon Core Strategy (2012), drawing on three potential population growth forecasts:

- (a) At least 6,500 additional dwellings and 5 ha of new employment land.
- (b) 10,100 additional dwellings and 14 ha of new employment land.
- (c) Up to 21,600 additional dwellings and up to 26 ha of employment land.

2.6 The objectively assessed need of the Borough identified during the preparation of the Draft Local Plan Core Strategy (2013): 16,000 dwellings and 49ha of new employment land. A summary of this appraisal can be found in paragraph 4.15, followed by a summary of the effects identified in paragraphs 4.24-4.29.

2.7 The objectively assessed need of the Borough identified during the preparation of the Draft Local Plan (2016): between 15,260 and 16,740 homes, and 8,600 jobs to be delivered within the Borough in the period from 2014 to 2034. It should be noted that the Draft Local Plan planned to deliver the minimum requirement of 15,260 dwellings, which after factoring in existing commitments required the allocation of 8,000-8,500 additional dwellings within the Draft Local Plan period. The appraisal of the Draft Local Plan (2016) is set out in Chapter 5 of the SA Report **[SUB006]**. Further details can be found in the SA Report which accompanied the Draft Local Plan consultation in 2016 which is available to view on the Council's [website](#).

2.8 The revised Publication Local Plan (2018) figures of 15,465 homes and 51ha of employment land over the Plan period. The appraisal of the Publication Local Plan (2018) is set out in Chapter 6 of the SA Report **[SUB006]**.

2.9 The Borough's latest housing OAN figures of between 19,497 and 19,776 homes was identified in 2018. However, the Council concluded that the allocation of more than 15,465 homes would be undeliverable. This decision was made before the appraisal of the Revised Publication Local Plan was undertaken. Therefore, the SA has not appraised meeting the Borough's latest housing OAN figures.

2.10 The Revised Publication Local Plan sets out the issues considered in coming to this conclusion, including a lack of site suitability identified through the Housing and Economic Land Availability Assessment (HELAA) Review **[EV011]** and Housing Options Topic Paper **[EV010]** and infrastructure delivery constraints. It is for this reason that the Council sent a letter dated 20 February 2018 to the other authorities in the South Essex Housing Market Area to explain the situation and to enquire whether they would be able to contribute to meeting Basildon's unmet housing need.

2.11 All these appraised quanta have been appraised alongside consideration of the spatial distribution of development. Should new deliverable site options or additional capacity within existing preferred site options be identified through the examination process, the SA can appraise the effects of meeting a larger proportion or all the housing needs of the Borough over the Plan period as part of the appraisal of main modifications and their reasonable alternatives. For example, the Council is in the process of producing a Basildon Town Centre Topic Paper that builds on the Basildon Town Centre Regeneration Strategy, including a proposed Main Modifications to Basildon Town Centre Regeneration Policy R2. The Topic

Paper is accompanied by Sustainability Appraisal of the proposed Main Modification to Policy R2 and two identified reasonable alternatives. The Main Modification responds to the identification of additional capacity to accommodate housing need in Basildon Town Centre in 2019 and 2020, which would contribute enough additional housing to meet the Borough's latest OAN housing figures in full without the loss of further Green Belt land. The Council would welcome the Inspector's recommendations with regards to this Main Modification, after which a final addendum to the SA Report [SUB006] will be produced, appraising all main modifications to the Revised Publication Local Plan and any new reasonable alternatives identified.

Q3 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?

3.1. The Submission Local Plan makes land provision for 17,791 dwellings but was only able to demonstrate the delivery of 15,465 dwellings during the plan period due to a number of factors preventing some site allocations from coming forward earlier than planned. As such the remaining 2,326 dwellings on sites that were held back at the start of the plan period are expected to be delivered beyond 2034. These constraints which have been termed as "concerns about delivery" are set out below:

3.2. Due to the limited supply of urban capacity at the time of preparing the Submission Local Plan, a significant amount of the housing supply was to come from site allocations currently within the extent of the Borough's Green Belt. These all require amendments to the Green Belt boundary which can only occur on adoption of the Local Plan therefore, the trajectory of the Submission Local Plan allowed time for the adoption of the plan before these sites become available. It also made realistic assumptions about lead in times and build out rates on these sites.

3.3. Some site allocations were located in close proximity to areas which exceed the statutory limit for nitrogen dioxide concentrations. These sites could not come forward for development prior to 2023 in the Submission Local Plan, which is when Nitrogen Dioxide concentrations were expected to decrease and fall within statutory levels.

3.4. Some sites required the relocation of playing pitches prior to commencement.

3.5. Development on a number of sites were constrained by the requirement to provide significant new highway infrastructure. Among the most significant projects was the provision of a grade separate junction on the A127/Pound Lane and the Billericay Relief Road.

Q4: 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?

4.1 As discussed in answer to Question 3 several of the strategic site allocations included within the Submission Local Plan, which would have significantly contributed to the provision for a five-year supply of deliverable housing sites, were unable to commence in the early years of the plan period. This is due to a number of constraining factors stated within the answer to question 3 including Green Belt release, air quality, playing pitch relocation and infrastructure requirements. These factors have suppressed the delivery of housing within the early years of the plan period however following their resolution higher delivery rates over later years in the trajectory would follow, thereby resulting in a stepped housing trajectory. At the time of submission the urban capacity as well as those site allocations which were able to commence within the early stages of the plan period was the maximum supply that could come forward.

4.2 Since the Local Plan was submitted for Examination in March 2019, the Council has undertaken further work which has removed some of the constraining factors which prevented the early delivery of some sites. In respect of air quality, air quality improvement measures, which were implemented post submission, are now expected to demonstrate compliance with the statutory levels for nitrogen dioxide concentrations earlier than envisaged by March 2021. Further highways modelling has demonstrated that development growth in Basildon can largely be accommodated within the Plan period with the alternative mitigation provided.

4.3 Basildon Borough Council has also continued to engage proactively with landowners and developers in order to streamline the decision making process and ensure sites come forward as expeditiously as possible upon the adoption of the Local Plan. This includes entering into Planning Performance Agreements on multiple sites. In consequence it is expected that these sites will be able to commence delivering homes as planned or earlier within the trajectory.

4.4 Furthermore, an Urban Capacity Analysis within the [Basildon Town Centre Regeneration Strategy 2020](#), has identified capacity for delivering around 4,200 new homes, a net increase of 3,012 homes over the Submitted Local Plan. This has led to the Council to suggest modifications to Policy R2 of the Submission Local Plan which will enable OAN to now be met within the plan period and improve the Council's position with regards to the provision of a 5 year land supply of housing sites. An updated five year land supply and Housing Topic Paper are being prepared.

4.5 The deliverability of this additional growth is reinforced through five recent planning applications for residential led development in Basildon Town Centre with a total capacity of

4,319, and from the success of securing Housing Infrastructure Fund (HIF) Bids on land within the Councils control for delivery of around 356 dwellings by 2030.

4.6 The removal of previously identified constraining factors, proactive engagement with landowners and developers, and the increased housing capacity in Basildon Town Centre has enabled the Council to now plan for the delivery of around 20,000 homes in the plan period. A revised Housing Trajectory and 5 year land supply report is being prepared.

Q5 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?

5.1 The answers to questions 5 and 6 have been combined below.

Q6 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?

Consideration of sites against Green Belt purposes

6.1 Where “Exceptional Circumstances” are considered to have been demonstrated, the need to meet high housing targets is often a contributory factor towards the release of sites from Green Belt. This requires a detailed analysis of the level of need and of available sites, allied to consideration of why the need cannot be met in locations which are sequentially preferable for such developments. Consideration must be given to the impact on the functioning of the Green Belt and its purpose, and what other advantages development in locations proposed for release from the Green Belt might then offer in terms of a sound spatial distribution strategy. Any such releases must be consistent with the overall aim of the Local Plan. Releasing the sites must be shown to be preferable to all other potential site options, including those on non-Green Belt land if and where such capacity is available.

6.2 There is always a need for Local Authorities to strike a balance between protecting the Green Belt on one hand - in line with the NPPF - with meeting development needs on the other. This balance is a matter of planning judgement based on local circumstances.

6.3 In accordance with the NPPF, Planning Practice Guidance and the test set out in *Calverton Parish Council v Greater Nottingham Councils* [2015] the Council considered if ‘exceptional circumstances’ existed within the Borough.

6.4 To support the preparation of the Submission Local Plan the Council undertook an extensive review of the Borough’s Green Belt. More detailed information on this is set out in

the [Green Belt Topic Paper 2018](#) [EV051]. In consultation with the Planning Advisory Service in 2016 the Council appointed a specialist to undertake an independent review of the methodology developed and applied by the Council in the Green Belt Review. Overall, the review concluded that the methodology applied was robust. The Council's Green Belt Review [EV052] showed that all except one of the Borough's Green Belt sites makes at least a partial contribution to upholding the purposes of Green Belt, defined under NPPF paragraph 134. Consequently, it is likely that development within its current extent **will cause harm** to the Green Belt.

6.5 The Council considered all potential sites that had been put forward for consideration against the impacts on the Green Belt function, as well as air quality, ecology, flood zone, flood risk (SWMP), historic environment, landscape appraisal, sustainable access, transport infrastructure, community infrastructure, services and utilities, informed by the outcomes of the SA. These are set out in the Housing Options Topic Paper 2018 [EV010].

6.6 A Green Belt Harm Assessment was also carried out which informed the decision-making process by considering the degree of Green Belt harm against the sustainability considerations in order to identify a suite of sites which most effectively contributed towards achieving sustainable development patterns as required by the NPPF. The findings of this are also set out in the Housing Options Topic Paper 2018 [EV010] and resulted in some Green Belt sites being omitted.

Consideration of alternative spatial strategies and sites through the Sustainability Appraisal

6.7 30 Strategic Sites were identified in 2015 as part of the preparation of the Draft Local Plan (2016). Details on the relationship of the strategic site options and the previous locations for growth considered (Broad Locations and PADCs) can be found in paragraphs 4.30-4.43 and accompanying Figure 4.1 and Table 4.1 in the Sustainability Appraisal (SA) Report [SUB006]. The Strategic Sites were cross-matched with the spatial findings from the evidence base and the SA to identify the draft development site allocations. The draft development site allocations were subject to SA alongside reasonable alternatives in Chapter 5 of the SA Report [SUB006]. Further details can be found in Chapter 5 and associated Appendix 4 of the SA Report that accompanied the Draft Local Plan Consultation in 2016 available on the Council's [website](#). Figure 4.2 in the SA Report [SUB006] illustrates the location of the drafted development allocations and their reasonable alternatives.

6.8 Various additional new and refined site allocation options were subject to SA as part of the preparation of the Publication Local Plan (2018). Details of the additional sites options tested and the reasons for them can be found in paragraphs 4.44-4.56 of the SA Report [SUB006]. Appraisal matrices for the new and refined site options can be found in Appendix 4 of the SA Report [SUB006]. Chapter 6 and Appendix 5 in the SA Report [SUB006] summarise the effects of the final proposed spatial strategy set out in the Publication Local Plan and its reasonable alternatives. The majority of the Publication policies score the same or better than the equivalent preferred policies presented in the Draft Local Plan. Reasons

for the selection of site allocation and policy options in the Publication Local Plan can be found in the reasonable alternative sections and more generally in paragraph 6.112 in Chapter 6 of the SA Report **[SUB006]**.

6.9 An SA Addendum was produced to appraise the significant effects of some omission sites for comparison with the other site options appraised throughout the plan-making process, including the final site allocations. None of the omission site options have since been selected for allocation. The reasons for this are set out in Table 1.1 of an SA Addendum **[SUB009]**. A comparison of the effects of the omission sites with the sites allocated in the Publication Local Plan can be found in paragraphs 1.25-1.27 of the SA Addendum **[SUB009]**.

6.10 The SA work helped the Council decide on the most appropriate spatial strategy and site allocations for inclusion in the submission Local Plan.

Deliverable and Developable Sites

6.11 In addition to identifying the impacts on the Green Belt and the consideration of sustainable development the Council also assessed every potential site on their deliverability and developability. The HELAA process identified land within the urban areas and also land in the Green Belt that had the potential to be developed, subject to a change in Green Belt policies and provided capacity for each site that had been found suitable for housing. As part of identifying whether a site was suitable, consideration was given to a range of constraints that may be situated within a site.

6.12 A Viability Assessment was then used to confirm the economic viability of all sites considered suitable for housing. The Development Viability Appraisals set out in the HELAA 2018 **[EV001]** provided high level viability assessments of each suitable and available site to identify those sites that would be achievable based on certain policy considerations. Sites were categorised to be either 'Viable', 'Marginal' (i.e. a small change in market conditions over the Plan may make them viable), or 'Not Viable'.

6.13 In conclusion the sites selected for release from the Green Belt were the sites where release was identified as causing the least harm to the Green Belt, represented the most sustainable development options and were considered deliverable and developable. These sites represent the maximum amount of land within the current extent of the Green Belt that could come forward for development and have resulted in the spatial distribution of site allocations within the Submission Local Plan.

6.14 Approximately 50% (8,747 dwellings) of the growth within the Local Plan is planned within the Basildon settlement area (including Laindon, Pitsea and Noak Bridge) which represents a proportionate amount of growth based on what Basildon can accommodate. Wickford has a dwelling provision of 3,513, while Billericay's dwelling provision is 3,034. The remainder of the housing growth is distributed among the serviced settlements.

Post Submission of the Local Plan

6.15 The subsequent identification of additional housing capacity in Basildon Town Centre on brownfield land provides sufficient supply to address the shortfall set out in the Submission Local Plan to meet the OAN in full. This rules out a need for further site appraisal and Green Belt work to identify further additional capacity within the Green Belt. This approach is consistent with paragraph 137 of the NPPF 2019 which states that the policy making authority must be able to demonstrate that it has exhausted all other reasonable options for meeting its identified development needs before considering the amendment of Green Belt boundaries.

PART 2 - THE DUTY TO COOPERATE

Q7 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.

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?

7.1 This question is comprised of two separate questions, which additionally appears to require an explanation of the status of Brentwood Borough Council's proposal for development at Dunton Hills Garden Village (DHGV). At the time of writing, it still does not appear to be a 'fait accompli' that the development will occur, as Brentwood's Local Plan is currently undergoing its Examination in Public (EiP). The status of DHGV at this point is that of a proposed allocation within a submitted Plan, while Brentwood's Examination hearing sessions are still underway and do not resume until February.

Q7a Has any specific liaison has taken place with Brentwood BC about the spatial relationship that would result (between their new settlement and the GB releases proposed to the West of Basildon)?

7.2 There has been considerable liaison with Brentwood Borough Council (Brentwood BC) on the issue of Dunton Hills, as Basildon Borough Council (the Council) and Brentwood BC initially worked together on "Dunton Garden Suburb" as the project was originally known from 2014-2016. It was developed to test the idea of a cross boundary development that could potentially be home to 4,000 – 6,000 houses, retail and leisure use, Gypsy and Traveller pitches, commercial, open space, access to local facilities, Country Parks and improved

infrastructure routes. On 4th November 2014, the Council and Brentwood BC signed a Memorandum of Understanding (MoU) setting out the terms and conditions for the joint project to explore Dunton Garden Suburb in accordance with Section 110 of the Localism Act 2011, also referred to as the Duty to Cooperate. Both Councils then subsequently prepared and approved a document on the proposed Garden Suburb for public consultation. This was accompanied by a Sustainability Appraisal and Habitats Regulations Commentary, prepared in November 2014 by LUC.

7.3 Consultation then took place for 10 weeks from January to March 2015. In December 2015, the [Dunton Garden Suburb Statement of Consultation - Dec 2015 \(basildon.gov.uk\)](http://basildon.gov.uk) [PC026] was published. The document was clear that the Statement of Consultation would inform decision making for both Basildon and Brentwood Councils on whether there are planning merits to consider a cross-boundary development option at Dunton in the respective borough Local Plans, through their own separate decision-making processes.

7.4 Having considered the matter further, and assessed the comments received during consultation, in early 2016 the Council decided not to proceed with the joint proposal to create the Dunton Garden Suburb. The 2014 MOU between the Council and Brentwood BC on this issue expired on 4th February 2016 and has not been renewed. A [Cabinet Report](#) dated 7 January 2016 then explained the Council's approach towards the Regulation 18 Local Plan, and alternatives to the formal site allocations.

7.5 In regard to H10 (as the West of Basildon Urban Extension was then known) and Dunton Garden Suburb, the cabinet report provided the following commentary: *"This policy allocates an area of land to the west of Laindon, in the area of Dunton to deliver 1,000 homes, 5.5ha of employment land and associated provision of nursing home spaces, and community facilities including a primary school. It is expected that a comprehensive masterplan is prepared to guide development in this location. Land to the south, adjacent to the railway line, is not currently being promoted for development, but has the potential to contribute to long-term growth in this location. It is therefore safeguarded for the provision of a further 1,350 homes, a further primary school and to provide land for any future secondary school requirement. In safeguarded status, this land is not relied on for housing provision within the plan-period. A new link road into this location is a requirement of policy H10, as is onsite education provision"*. Site H10 was indicated on the Regulation 18 [Draft Local Plan Policies Map - 2016](#)

7.6 The Cabinet Report also made clear that, as an alternative and with regard to the joint consultation document produced by Basildon and Brentwood BC in 2015, *"consideration was given to proposals for a cross boundary development entitled Dunton Garden Suburb, which could have provided between 4,000 and 6,000 homes, a Gypsy and Traveller Site, employment development, community infrastructure and open space. The response to the consultation raised many concerns and indicated a need for additional evidence to demonstrate the larger area was the most appropriate location for development for both Boroughs... at this time Basildon Borough Council cannot support such a proposal as Brentwood Borough Council had not made available sufficient evidence at this time to indicate that this is the most appropriate approach to the location of development in their area. If they were to do this, as part of their own Local Plan preparation, further consideration would need to be given to this proposal by the Council, as part of the Duty to Cooperate, to*

consider whether the concerns have been addressed and whether it could help make a contribution to Basildon Borough's housing needs given its physical proximity to the Basildon Borough."

7.7 In March 2016, the Council highlighted concerns about the Dunton Hills Garden Village proposal in its response to Brentwood BC's Draft Local Plan Consultation, recognising that Brentwood were proposing development adjacent and possibly up to the boundary with Basildon Borough. Basildon Council noted that the location for DHGV did not represent the most appropriate location for growth, based on Brentwood BC's evidence and supporting infrastructure.

7.8 The [Dunton Area Landscape Corridor](#) Design Options **[EV056]** was then prepared for the Council and Brentwood BC in December 2017 as joint evidence under the Duty to Cooperate, to look at how a potential settlement in Brentwood Borough and the West of Basildon extension could be delivered. This notes the degree to which each of the three proposed landscape corridor schemes prevent visual settlement coalescence, with landscape and biodiversity as the priority and considered a 2,700 home settlement at Dunton Hills. **[EV056]** was submitted to the Examination in March 2019, however with Brentwood BC confirming at their EiP hearings that they now expect to receive a planning application for 4,000 homes, the findings and costings contained within this study will no longer be up to date.

7.9 A [Committee Report](#) dated 7 December 2017 considered matters of housing for the Local Plan, and the relationship between housing and Green Belt designation. The report recommended Site H10: West Basildon Extension as an allocation in the Basildon Local Plan for 2,300 homes and supporting facilities. However, due to the risk of coalescence between settlements and its likely impacts on the Green Belt (discussed in more detail under 'Impacts on the Green Belt' subheading) the Council decided that the allocation should be reduced in scale from 2,300 to the 300 homes currently proposed in the submitted Local Plan under Policy H8. The remainder of the land in this area was to be safeguarded for the whole Plan period.

7.10 On 7 March 2018, a [Committee Report](#) on the Council's response to Brentwood BC's Draft Local Plan Preferred Site Allocations Consultation 2018 reiterated the Council's objection to the proposals for Dunton Hills Garden Village. As a consequence of some existing services being shared between the two Boroughs, including healthcare and schools, it was considered *"essential for Brentwood Borough Council to work more closely with Basildon Borough Council to determine the impacts such development proposals may have on infrastructure and services in the Basildon Borough (as identified in the Interim Sustainability Appraisal) and how development options of this nature may need to support the upgrade of services and facilities in Basildon Borough, should (Brentwood) Council continue to include Dunton Hills Garden Village in its Local Plan"*. At this time, the Council stressed that it did not believe that enough work had been carried out to determine the relevant infrastructure requirements for the Brentwood Borough growth, and this could negatively affect the Brentwood Borough Local Plan's soundness and delivery.

7.11 In 2019, the Council submitted further responses to Brentwood BC's [Regulation 19 Pre Submission Local Plan](#) and the [Regulation 19 Addendum of Focussed Changes](#)

consultations, which considered the potential implications for Basildon Borough that may arise from the Brentwood Local Plan.

7.12 The Council's March 2019 [Duty to Cooperate Report \[SUB013\]](#) identifies a full list of cross-boundary matters where joint working is deemed necessary.

The Council's position on Dunton Hills Garden Village (DHGV)

7.13 Following the Council's decision not to proceed with the Dunton Garden Suburb in 2016, Brentwood BC took a different approach, and looked to allocate what is now known as DHGV as a location for housing growth in the Brentwood Local Plan - as they were fully entitled to do under the terms of the 2014 MoU between both Councils.

7.14 However, the Council raised objections to the DHGV proposal at each stage of Brentwood's plan preparation. The Council considers that there is a lack of robust evidence to justify the proposal, and the potential cross-boundary implications of the scheme do not appear to be fully recognised by Brentwood BC. The strength and number of objections to the proposal from previous consultations, along with the significant infrastructure requirements were among the reasons for Basildon Council seeking alternative solutions to allocate and deliver housing growth in Basildon Borough.

7.15 Within the Statement of Common Ground signed between the Council and Brentwood BC for the Brentwood EiP, **[Brentwood document F17F]**: the Council expressed that it remains to be seen "*whether Brentwood BC has made the most of alternatives or evidence, before embarking on its preferred spatial strategy for the redistribution of housing growth*". That is one of the key issues of soundness currently being tested through the Examination. For reference, the Council's hearing statements are available at [G1B](#) (Matter 1, Duty to Cooperate), [G2B](#) (Matter 2, Spatial Strategy) and [G6B](#) (Dunton Hills Garden Village).

7.16 Brentwood's Sustainability Appraisal highlights that there are more sustainable locations for housing growth within that borough than the DHGV option - including their two main settlements of Brentwood and Shenfield which will be served by Crossrail and its fast, frequent links to London when the line opens. The submitted assessments for DHGV cover a development of 2,700 homes, but as confirmed during their Matter 6 hearings, Brentwood BC anticipate the receipt of a planning application for 4,000 homes during 2021. Furthermore, Essex County Council (as the highway authority for the area) is still assessing the transport implications of the additional housing proposed.

7.17 Without this information to hand while drafting the Local Plan, it is unclear how Brentwood BC could have confidence that the evidence to underpin its overall spatial strategy is sufficiently robust. Moreover, the impacts and infrastructure requirements for a development of 4,000 homes will be substantially greater than for that of 2,700; the resident population could be up to 50% larger than was previously envisaged at the time of the impact assessments being undertaken, with associated impacts on pedestrian and vehicular movements, impacts on the road network, school places, heavy infrastructure provision, and health services, a list which is not exhaustive.

7.18 The land on which DHGV is proposed to be constructed is Green Belt, close to the boundary between the two boroughs. Brentwood BC's justification for the project seems to be that the location could host a greater quantum of development at DHGV, given the high proportion of Green Belt in their borough (89.7%). However, the DHGV site is adjacent to the A127, which is an area of poor air quality. This will make new public transport connections fundamental, including links between the site and Basildon. The development will be entirely reliant on new infrastructure, including heavy utilities and social infrastructure, a fact which Brentwood BC itself does not dispute. The Council, as well as a number of representors, highlighted concerns around the lack of robust evidence to justify and support the development at DHGV in preference to seeking housing growth at other key locations in Brentwood borough (including some of their omission sites).

7.19 Detailed viability matters will form part of the future hearing discussions when the EiP resumes during February, but a total S106 bill of £62.5m was mentioned in the Matter 6 DHGV hearing session to meet the likely costs of infrastructure provision. On several different occasions during Matters 2 and 6, (where the spatial strategy and DHGV were discussed) the Inspectors probed the implications of the non-delivery or delayed delivery of any new infrastructure, especially public transport links, by asking follow-up questions. In addition there are no supplementary agreements in place which expect schools in either Basildon or Thurrock boroughs to provide places for pupils who are resident at DHGV. Brentwood have committed to building the schools in the first place.

7.20 As the Inspector will be aware, should the evidence put forward by a Local Authority fail to justify the approach set out by its Plan, this is a matter which affects the soundness of the overall strategy. Consequently, at the time of writing, the Council considers that a degree of uncertainty remains as to a possible adoption date for the Brentwood Local Plan, and any timetable for if or when DHGV will come to fruition.

7.21 Importantly, the land which DHGV occupies falls entirely within the borough of Brentwood. As such, the DHGV proposal does not stop Basildon Council from proceeding with its own local plan making activities. If (following the conclusion of the Brentwood EiP and the submission of the DHGV planning application) permission is eventually granted for DHGV, then further discussions will need to be held with Brentwood to ascertain how the new settlement may impact on Basildon borough. This will help to ensure that the necessary mitigation can be provided as development activity progresses. Moreover, there remains scope for further joint working between both Councils in the future on this matter.

Q7b Has the impact on the Green Belt, and its purposes, been assessed?

7.22 A Committee meeting of [19 March 2018](#) approved the publication of an earlier submission version of the Basildon Local Plan for consultation. In the general discussion of site allocations proposed within that Committee Report, reference was made to an earlier meeting on [7 December 2017](#) where committee considered whether to agree to an allocation of 76ha for 2,300 homes West of Basildon (H10). Due to concerns regarding the impact on the Green Belt, and settlement coalescence arising from a combination of potential development in Basildon together with developments within the neighbouring boroughs of Brentwood and Thurrock, it was decided that the entire West of Basildon site should not be taken forward during the plan period, but would instead be 'safeguarded' in part to indicate it

may have a role to play in future land supply. However, on 19 March, the Committee revised the Council's position regarding the safeguarded land, and removed it from the Local Plan due to an insufficient justification for exceptional circumstances required to safeguard the land for future development.

7.23 Brentwood BC published site proposals for a Regulation 18 Site Allocations consultation in January 2018. Those proposals included the provision of a new Garden Village (Dunton Hills) adjacent to the joint boundary with Basildon along the A127. The scale of DHGV had also increased in size since 2016 and the original joint 'Garden Suburb' consultation. Additionally, there were proposals for further development around West Horndon, also close to the borough boundary. Members were advised in the Committee Report of 19 March 2018 that *"the risk of settlement coalescence in this current Green Belt location, between the western edge of Laindon and West Horndon therefore remains an increased possibility, which Basildon Borough should consider further in respects of how it should proceed in treating the land previously identified for safeguarding"*. The Committee again agreed to exclude this larger allocation on land West of Basildon having regard to the concerns raised.

7.24 NPPF paragraph 134 makes it clear that Green Belt serves five purposes:

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

7.25 These five purposes and overall impact on the Green Belt formed part of the justification for the current capacity at H8: West of Basildon (previously H10) being retained at 300 homes (described in the Committee Report above, and the SA Report **[SUB006]**). The Council considered that suitable actions were taken to conserve the Green Belt and protect it from the impacts of development as far as possible given the risk of coalescence of settlements with a development of 2,700 homes being proposed at DHGV. The smaller scale proposal also retained a defensible boundary to the west of H8 – Lower Dunton Road.

7.26 The borough's housing target increased to 986 per annum following the publication of the SHMA Addendum 2017 **[EV009]**. In preparation for the Revised Publication Local Plan and the failure to meet OAN in full, on [13 September 2018](#) the Council's Strategic Planning and Infrastructure Committee were asked to look again at site capacities, and sites which had been omitted as the local plan was failing to meet its OAN in full. The Committee ultimately resolved that Site H8 should not revert to a higher target, again citing concerns with regards to the risk of settlement coalescence and impacts on Green Belt arising from the proposals at DHGV.

7.27 Nevertheless, it is acknowledged that the development of Brentwood's DHGV proposal would make adjoining areas of Green Belt land on the Basildon side of the boundary a more 'sustainable' location for development (as defined by the NPPF), potentially making it more challenging to defend the purposes of Green Belt on the Basildon side of the boundary

in future. This is a concern to the Council, for one of the key reasons for reducing the scale of the West of Basildon allocation (discussed above) was that of the risk of settlement coalescence.

7.28 Paragraph 6.27 of the [Basildon Green Belt Review 2017 \[EV052\]](#) identified that 74 of the 75 parcels of land within the borough's Green Belt made a contribution to at least one of the five purposes of Green Belt land, defined under Paragraph 134 of the NPPF. Importantly, all of the parcels of Green Belt land along the western edge of the borough (adjoining the boundary with Brentwood BC) were identified as having a role to play in the prevention of encroachment.

7.29 Should Brentwood BC's inspectors approve the DHGV allocation at its current scale, it remains to be seen how the development will relate in terms of access and connectivity to the Basildon urban area. Suitable arrangements will be required, as the nearest town centre and acute healthcare facilities to DHGV are situated within Basildon Borough. The proposal has also grown in size: from the 2,300 homes initially envisaged in 2014, to 2,700 in 2016 with a further enlargement to the planning application for 4,000 homes which Brentwood expect to receive this year, as stated in their Matter 6 EIP hearing.

7.30 However, DHGV is an allocation proposed by Brentwood BC, a point which cannot be overlooked. With DHGV forming one of Brentwood BC's site allocations in their Local Plan, the ultimate responsibility for an assessment on the Green Belt within and around the area would lie with that authority. Since 2016, the Council has consistently communicated its point of view that more evidence would be needed to justify the proposal. Responses at the draft Regulation 18 and Regulation 19 stages of the Brentwood Local Plan also reinforced the Council's concerns regarding the allocation.

7.31 Brentwood BC's 2020 [Green Belt Topic Paper](#) merely makes reference to their local plan policy R01 requiring *"a green infrastructure buffer / wedge on the eastern boundary with Basildon Borough to achieve visual separation to help significantly improve the landscaped and habitat value thus reinforcing the beneficial purpose and use of the green belt in that zone."* Within the Green Belt section of Brentwood's 2020 [Dunton Hills Garden Village topic paper](#), it is stated that *"removal of land from the Green Belt reduces the total amount of Green Belt within Brentwood Borough by 1%. In percentage terms this is not significant. The allocation accords with Paragraph 83 and 84 of the NPPF and the allocation will assist in ensuring the longer-term permanence of the Green Belt elsewhere"*.

7.32 Such explanations may comply with relevant individual paragraphs of the NPPF, but they do not fully reflect of the cross-boundary implications of the proposal, thus highlighting the Council's objections to the DHGV proposal and its submissions to the Brentwood EIP.

PROVISION FOR GYPSIES AND TRAVELLERS AND TRAVELLING SHOWPEOPLE

Q8a 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).

GTAA 2018

8.1. The [Basildon Borough Gypsy and Traveller Accommodation Assessment \(GTAA\) 2018 \[EV018\]](#) concludes that there is a net need of **47 pitches** for those Gypsy and Traveller (G&T) households who meet the planning definition, while the additional need for those households who meet the planning definition of a Travelling Showperson is **3 plots**, over the period 2016 - 2034.

8.2. As well as calculating need for households that can be confirmed as meeting the planning definition of a Gypsy or Traveller, the Council sought to assess how many of those households who could not be interviewed might also be Gypsies and Travellers by applying a factor derived from national statistical research¹. On that basis, the need for Gypsy and Traveller pitches is **53 pitches**. There was no assessed need for unknown Travelling Showpeople.

8.3. Against that background, Policy H4 of the Revised Publication Local Plan (RPLP) allocates 15 new pitches across 4 new residential Gypsy & Traveller sites. In addition to these allocations, Policy H3 anticipates that appropriate *unauthorised sites*² within the Green Belt could be regularised and permitted for use by 'travelling' Gypsies and Travellers, by applying the development management criteria set out in Policy H24. This is expected to contribute to delivering a minimum of 29 pitches. Taken together with sites allocated by policy H4, the plan therefore makes provision for at least 44 G&T pitches. That results in a shortfall of 9 pitches.

8.4. That shortfall is to be addressed in part by Policy H3 of the RPLP, which states that the Council will work closely with the neighbourhood areas, where the community includes G&Ts, to ensure that the need for further pitches is accommodated by the Neighbourhood Plans. The policy also states that the Council will continue to work with neighbouring authorities to identify a strategic approach to meeting the needs of Gypsies, Travellers and Travelling Showpeople in accordance with the requirements of national policy.

8.5. The Council has made provision for a new Travelling Showpeople yard accommodating all 3 new plots within the new employment land allocation at Burnt Mills, under Policy E6.

¹ On this basis, 10 per cent of all households who were not interviewed are assumed to meet the definition of "Gypsy or Traveller" -

² Caravans on land owned by Gypsies and Travellers and without planning permission. -

GTAA 2020

8.6. An explanation of the significant increase in need identified within the [GTAA 2020 Update \[PSD006\]](#) had previously been published within the accompanying [Gypsy, Traveller & Travelling Showpeople Position Statement August 2020 \[PSD007\]](#).

8.7. Given the passage of time since the (2016) baseline date of the GTAA 2018, the GTAA 2020 provides a revised assessment of need for the period 2019 - 2038, covering the plan period for both the Basildon Local Plan and the South Essex Plan. The report includes information on new sites that had not been assessed as part of the GTAA 2018, as well as updates on sites where the travelling status of occupants were previously unknown or have changed e.g. through information submitted as part of planning applications. The revised GTAA also reflects a more up-to-date national average for unknown households. While the GTAA 2018 assumed that 10% of the Borough's unknown households could meet the planning definition, the GTAA 2020 uses a higher average of 30%.

8.8. This has taken the total need for households that meet the planning definition to **68 pitches** for Gypsies and Travellers. When accounting for all known and a reasonable proportion of unknown households however, the need for Gypsy and Traveller pitches increases to **85 pitches**, if it is assumed that approximately 30% (17 pitches) of the Borough's unknown household needs could meet the planning definition. The need for Travelling Showpeople households that meet the planning definition remains **3 plots**.

Table 8.1: Basildon Borough Gypsy, Traveller and Travelling Showpeople Needs (Including Unknown Allowance)

	GTAA 2018	GTAA 2020
Gypsy & Traveller Pitch Needs (Known)	47	68
Gypsy & Traveller Pitch Needs (Unknown Allowance)	6	17
TOTAL	53	85
Travelling Showpeople Plot Needs (Known)	3	3
COMBINED TOTAL	56	88

Gypsy & Traveller Accommodation Strategy

8.9 Given the revised pitch needs from the GTAA 2020 and the shortfall in the supply of suitable G&T pitches, the Council has elaborated on its existing evidence base to explore the extent to which Policy H3 can deliver the land supply required to meet identified G&T needs in the borough, as detailed below.

Allocations in the Submitted Plan

8.10 To help meet the identified need for Gypsy, Traveller and Travelling Showpeople accommodation within the Borough, the Council has made provision for **15 pitch allocations**

for Gypsies and Travellers and **3 additional plots** for Travelling Showpeople through Policy H4.

Unauthorised Sites and Sites with Temporary Planning Permission

8.11. In addition to the new G&T allocations, Policy H3 anticipates that appropriate unauthorised sites within the Green Belt that are currently occupied by Gypsies and Travellers for at least 3 months as of the 18 October 2018, could be regularised and permitted for use by 'travelling' Gypsies and Travellers, subject to meeting specified design and location criteria as set out in policy H24.

8.12. According to the GTAA 2020, there are currently 50 unauthorised pitches in the borough. In addition, there are 8 pitches with *temporary planning permission*³ for a fixed period of time, after which they could once again become unauthorised sites. This means that there could be an additional capacity for up to 58 pitches from existing unauthorised and temporary sites. Households living on *tolerated pitches*⁴ have not been included in this figure as enforcement action is not expedient on such sites, and a certificate of lawful use would normally be granted if sought.

8.13. The ability of unauthorised and temporary sites to contribute towards meeting G&T accommodation needs would however depend on the planning status of the occupants, as the criteria specified within Policy H24 expects proposed occupants to meet the relevant planning definitions set out in the PPTS when applying for sites to be regularised. Furthermore, the criteria in Policy H3(1)(c) would not apply to unauthorised sites that had not been occupied for at least 3 months as at the 18 October 2018. Consequently, Policy H3 can only rely on the delivery of **15 unauthorised/temporary pitches** at this time, which are known to be occupied by Travellers who meet the planning definition, and would therefore be suitable to meet the criteria based policy

Further Intensification/Expansion of Existing Sites

8.14. The [Basildon Borough Site Provision Study 2018 \(BBSPS\) \[EV017\]](#) provides the evidence base relating to the site potential to deliver new pitches and plots to meet the accommodation needs of Gypsies and Travellers and Travelling Showpeople in Basildon Borough.

8.15. The BBSPS reveals that there is potential for a further **10 new pitches** that could come forward by intensifying or expanding suitable, available and achievable sites within the Green Belt. Whilst these sites had previously been discounted due to a lack of safe and sustainable highways access to the Hovefields and Honiley Neighbourhood Area, it should be noted that with the exception of 2 pitches on BAS025 and BAS031 (see Appendix 1), the other affected sites fall outside the boundary of the Hovefields and Honiley Neighbourhood

³ A private site with planning permission for a fixed period of time.

⁴ Accepted encampments which are tolerated without enforcement action.

Area. Notwithstanding, given that the BBSPPS has already assessed these sites against broad suitability criteria (including site access, safety and accessibility to facilities) and deemed them as suitable in line with the PPTS, it is considered reasonable for the Council to allocate the sites for G&T provision in order to contribute towards identified needs.

8.16. Therefore, the Local Plan can identify **40 pitches** across the four sources of land supply listed in Table 8.2 below. A full schedule of those sites identified to contribute towards the identified needs for Gypsies & Travellers is listed within Appendix 1. A map showing the site locations is set out in Appendix 2. As previously established, **3 plots** will also be provided for Travelling Showpeople as part of the new employment allocation E6.

8.17. With the exception of BAS149 (Land west of Gardiners Lane South), all the sites identified for Gypsy, Traveller and Travelling Showpeople provision are located within land currently designated as Green Belt. Consequently, some amendments may be required to be made to the Green Belt where development is not exceptionally permitted.

Table 8.2: Gypsy & Traveller Pitch Supply across New Site Allocations and Existing Unauthorised Sites

Source of Supply	No. of Pitches
Allocation in the Submitted Plan	15
Capacity from Households meeting Planning Definition on Unauthorised/Temporary Sites	15
Further Intensification/Expansion of Existing Sites	10
PITCH SUPPLY	40
SCALE OF NEED (GTAA 2020)	85
POTENTIAL SHORTFALL	45

Windfall Growth

8.18 Gypsy & Traveller sites which have not been specifically identified as available through the Local Plan process may still be able to contribute towards supply during the plan period.

8.19 As stated in Policy H3(1)(c), appropriate unauthorised sites within the Green Belt are expected to contribute to delivering a minimum of 29 new pitches. Of these, 15 pitches have already been identified as deliverable, based on the planning status of the current occupants. Should further information be made available to the Council that will allow for the planning definition to be applied to other existing G&T households not currently accounted for, such households could count towards meeting identified needs. Policy H24 sets out the development management criteria applicable when considering the merits of applications for G&T sites. This serves as a basis for establishing the sites and pitches that would qualify to be regularised, according to the policy criteria.

8.20 In addition to the above, a significant number of the Borough's existing Gypsy and Traveller sites are also located within the Green Belt, particularly within the Borough's

Plotland areas. In accordance with Policy GB4 'Green Belt Residential Infill Development', limited residential infilling within the Green Belt will exceptionally be permitted where it does not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. This policy applies to all areas within the Green Belt with the exception of the designated Hovefields and Honiley Neighbourhood Area, subject to certain criteria. Policy GB4 therefore, also has the potential to provide new G&T pitches in the future, when applying the policy criteria.

Neighbourhood Planning Areas

8.21 In accordance with Part 2 of Policy H3, the Council remains committed to working with the designated neighbourhood areas in the borough where the community includes Gypsy and Travellers, to ensure that the growth arising from those households is met within the Neighbourhood Area as part of any development that occurs.

8.22 Specifically, both the 'Hovefields and Honiley' and 'Bowers Gifford and North Benfleet' Neighbourhood Areas cover land which include a number of authorised, tolerated and unauthorised Gypsy and Traveller sites. The Neighbourhood Areas are currently in the process of preparing their respective Neighbourhood Plans, through which it would be appropriate to address the needs arising from existing G&T pitches/sites in their areas, as sourced from the GTAA. Where necessary, the Council would work with the Neighbourhood Areas to set G&T pitch targets, which enables the community to determine their own site allocations for meeting such target.

Broad Locations for Housing Growth

8.23 The areas to the south of Crays Hill and south of Wickford (including the Hovefields and Honiley Neighbourhood Area), which currently include a substantial G&T community, have been identified as broad locations for potential housing growth. At this time, there are a number of constraints affecting both these areas which prevent them being identified as specific development locations within the plan, including matters related to sustainable access. However, the Council recognises that there may be opportunity to bring forward comprehensive schemes in these areas that seek to redevelop and improve the condition of brownfield sites if existing constraints can be addressed and overcome, and make provision for the whole community. As a result, the Council will reconsider these locations for housing growth in the next Local Plan review, allowing time for sustainable development proposals to be identified. This could contribute to meeting any remaining shortfall in pitch supply at that time.

Q8b 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?

8.24 Yes, this approach can be justified as the Council can demonstrate a 5 year supply of sites, and a longer term strategy for delivery of additional sites. As detailed above, the Council will allocate 14 sites listed in Appendix 1 in accordance with the relevant policy requirements to deliver 40 pitches, and will make consequential changes to the Green Belt to reflect the exceptional and urgent need for additional Gypsy & Traveller site provision in the Borough. A new Travelling Showpeople yard accommodating 3 plots will also be provided within the new employment land allocation at Burnt Mills, under Policy E6.

8.25 Table 8.3 below details the scale of need broken down into 5 year epochs until 2038, as established within the GTAA 2020. The Council's 5 year need is 43 pitches, and as identified within Table 8.2 and Appendix 1, the pitch supply across new and existing G&T sites is 40 pitches. This means that in the short-term, the Council is able to broadly demonstrate that it has identified a supply of deliverable G&T sites to provide 5 years' worth of sites against its assessed need, as required by the PPTS.

Table 8.3: Need for G&T Households that meet the Planning Definition by 5-year periods⁵

Years	0-5	6-10	11-15	16-20	Total
	2019-23	2024-28	2029-33	2034-38	
	43	13	11	1	68

8.26 Additional supply is also likely to come forward through windfall, as well as the requirement for further joint working with the designated neighbourhood areas in the Borough during the plan period.

8.27 Based on a robust assessment of Gypsy, Traveller and Travelling Showpeople accommodation needs in the borough, as well as the most up-to-date evidence on the site potential to deliver new pitches and plots across the borough, the Council considers its strategic approach to Gypsy, Traveller and Travelling Showpeople Accommodation to be justified.

8.28 The Council's Gypsy, Traveller and Travelling Showpeople policies will be subject to monitoring and review through the Authority Monitoring Report, to determine the extent to which the policy objectives are being achieved. It is expected that the next review of the Local Plan would consequently address any shortfall in pitch supply at that time. This would also

⁵ Excluding 30% of Unknown Households Need.

align with the proposals for identifying sustainable development options within the 'Broad Locations for Housing Growth'.

APPENDIX 1: LIST OF GYPSY, TRAVELLER & TRAVELLING SHOWPEOPLE SITES IDENTIFIED TO MEET LOCAL PLAN NEEDS

GYPSY & TRAVELLER SITES

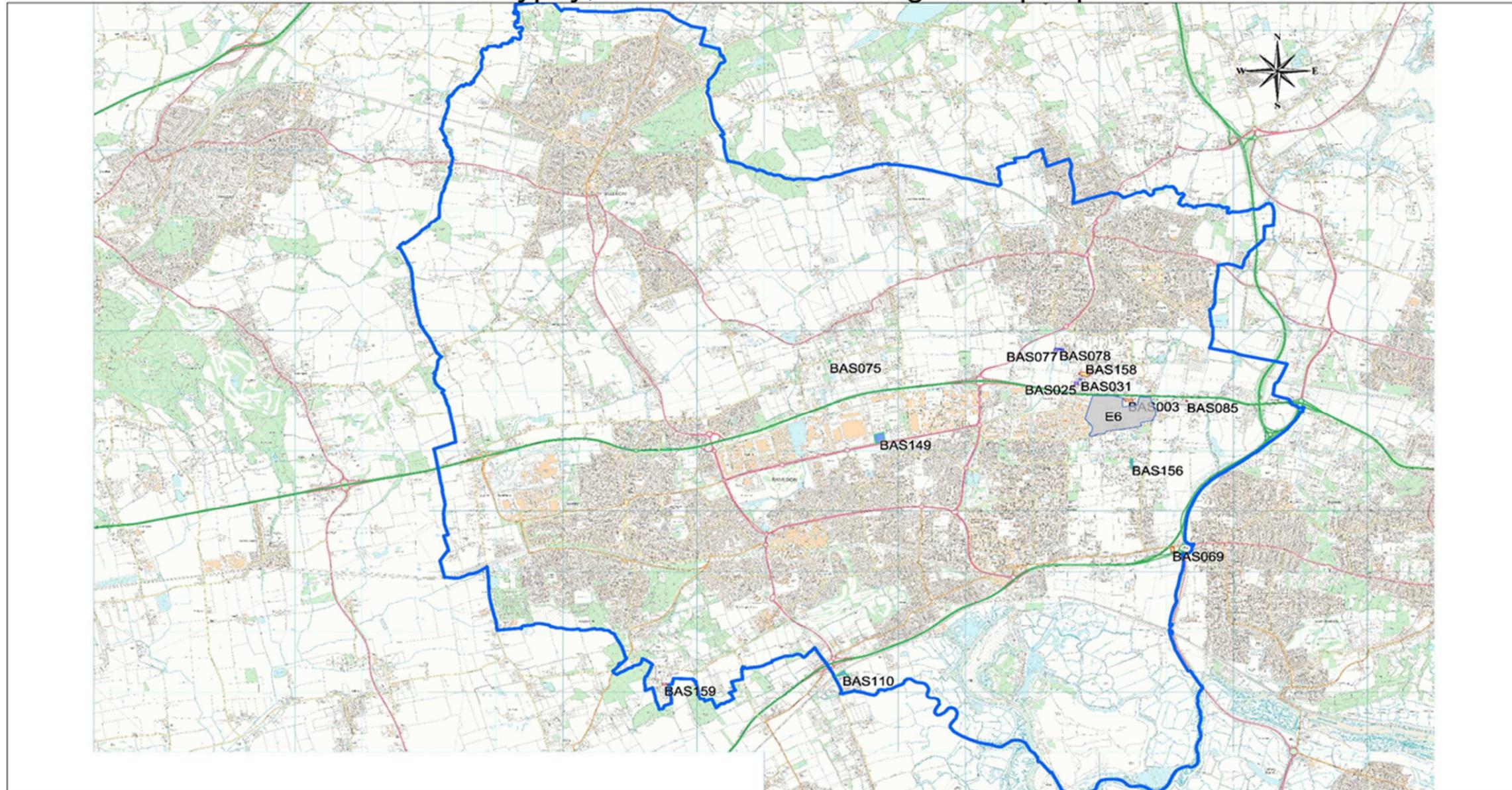
Site Ref.	Site Name	Post Town	Site Status	Total No. of Pitches
New G&T Site Allocations within the Submitted Local Plan				
BAS149	Land west of Gardiners Lane South, Basildon	Basildon	New Site	10
BAS075	Fox Gardens	Crays Hill	New Site	2
BAS156	Land East of The Willows	North Benfleet	New Site	1
BAS110	Land at Readers Yard and Willows, Fobbing	Basildon	New Site	2
Sub total				15
Capacity from Households meeting Planning Definition on existing Unauthorised/Temporary Sites				
BAS031	Hatchertang, Hovefields Avenue	Wickford	Existing Unauthorised	1
BAS085	Rear of Foxgrove, North Benfleet	North Benfleet	Existing Unauthorised	1
BAS069	Sadlers Park	Pitsea	Existing Unauthorised	2
BAS158	Silva Lodge, Hovefields Avenue	Wickford	Existing Unauthorised	5
BAS003	Willow Farm, Cranfield Park Avenue	North Benfleet	Existing Unauthorised	5
BAS159	Land North of Freelands, (Bluebells)	Basildon	Existing Temporary	1
Sub total				15
Further Intensification/Expansion of Existing Sites				
BAS031	Hatchertang, Hovefields Avenue	Wickford	Existing Unauthorised	1
BAS025	Haywoods, Hovefields Avenue	Wickford	Existing Authorised	1
BAS077	The Burrows, Fairmead Plotland	Wickford	Existing Tolerated	5
BAS078	1 The Burrows, Fairmead Plotland	Wickford	Existing Tolerated	3
Sub total				10
TOTAL				40

TRAVELLING SHOWPEOPLE SITES

Site Ref.	Site Name	Post Town	Site Status	Total No. of Plots
New Site Allocation within the RPLP 2018				
-	Land east of Burnt Mills	Basildon	New Site	3

APPENDIX 2 – MAP SHOWING GYPSY, TRAVELLER & TRAVELLING SHOWPEOPLE SITES IDENTIFIED TO MEET LOCAL PLAN NEEDS

Local Plan Gypsy, Traveller & Travelling Showpeople Sites



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Date: 20/01/2021	Scale: 1:60000