

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

I am very grateful for the Council's detailed response to my initial questions and after considering them in detail I am now able to set out a way forward for the Examination.

The first point to make is that Basildon Town Centre Regeneration Strategy 2020, and the conclusions the Council is drawing from it in terms of the provision of housing against OAN generally, and its implications on the five-year supply of housing land, puts a very different gloss on the Plan.

In some ways, this impact will be a positive one. The additional housing in the town centre could address my concerns about the Plan as submitted not meeting its OAN in full, for example. Moreover, it may be that as a result of the expeditious delivery of this additional housing the resulting trajectory might secure a continuous five-year supply of housing land over the plan period.

My concern though is that the Basildon Town Centre Regeneration Strategy 2020, the revised Housing Topic Paper (still in preparation), and the updated five-year housing land supply calculations (still in preparation), make up a significant body of new evidence. There are other areas of new evidence too, including that relating to the air quality issue, and the revised GTAA.

It strikes me that it would be most unfair for the Examination to proceed to Hearings without those with an interest being given the opportunity to comment on this new information, and the implications it has for the Plan as submitted.

To that end, I require the Council to publish the revised Housing Topic Paper, and the updated housing land supply calculations as soon as possible, alongside the remainder of the new evidence that the Council now relies upon. I would also like published the draft modifications to the Plan required as a result of this new evidence. I then intend to open all this, alongside your response to my IIQs, to consultation, for a period of six weeks.

I then intend to programme Hearings based on the Plan as proposed to be modified, with the attendant evidence base, and the consultation responses.

To inform that exercise, there is another, quite fundamental, point to consider.

The National Planning Policy Framework (the Framework) says in paragraph 60 that '*To determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals*'.

Planning Policy Guidance (PPG) sets out that '*local housing need calculated using the standard method may be relied upon for a period of 2 years from the time a plan is submitted to the Planning Inspectorate for examination*'.

The housing targets set out in the Plan as submitted are based on the findings of the SHMA Addendum of May 2017 (which is in turn based on the 2014 household projections). The Plan as submitted usefully explains how the workings of the SHMA Addendum compare to the standard method and draws its conclusions safe in the knowledge that there is little difference between the out-turn of the SHMA Addendum, and the standard method, at the time it was written.

Bearing in mind what is said in the Framework and the PPG, I have some unease about the vintage of the figures in the SHMA addendum. Given the time that has elapsed since they were formulated, and the Plan was submitted, I wonder whether it is still safe to say that there is little difference between the out-turn of the SHMA Addendum, and the standard method. My concern, with that point in mind, is whether continued reliance upon them can be justified. This is especially so when one considers that they are being used to provide exceptional circumstances to underpin significant Green Belt releases.

I recognise that the delays we have faced in the examination, which has brought the vintage of these figures into sharper focus, are for reasons largely outside your control. However, as part of the exercise I have outlined above, and in order to properly inform changes that need to be made to the Plan, as submitted, I do not think I have any reasonable alternative other than to ask you to carry out an up to date assessment of the minimum number of homes needed, using the standard method set out in the PPG. I would be grateful if you could then advise me of your initial conclusions about the implications of any variation from the assessment of need on which the Plan as submitted is based.

It strikes me that it would be better to run that exercise first so that its conclusions can properly inform your Housing Topic Paper, the revised housing trajectory, and the (draft) modifications that will be required to the Plan as submitted.

I recognise there is a good deal of work involved in all this, but I would be grateful if you could give me a suggested timetable for what I have requested.

Paul Griffiths
INSPECTOR
23 March 2021