

Alison Griffin
Chief Executive
Southend Borough Council

Date 20 February 2018
Department Planning Policy Team
Tel. No 01268 208045
E-Mail planningpolicy@basildon.gov.uk

Dear Alison,

BASILDON BOROUGH LOCAL PLAN 2014-2034: DUTY TO COOPERATE UNMET HOUSING NEEDS

I write to you in respects of the Basildon Borough Local Plan 2014-2034 and in particular, the challenge it faces in meeting all of its housing needs by the end of the plan period; a need which stands at just under 20,000 homes by 2034.

As you are aware from the South Essex 2050 joint workshops and more recently at the Association of South Essex Local Authorities (ASELA) meetings, Basildon Borough Council is in the concluding stages of finalising its statutory Local Plan, which considers how to manage the competing challenges facing the Borough in respects of housing, the economy, town centres, the environment and infrastructure.

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The outcomes of that meeting, including recommended remedial actions, were reported to the Infrastructure, Growth and Development Committee on 16 January 2018. It delegated to me the task of writing to the South Essex Housing Market Area authorities, in respects of our unmet housing need and seeking a considered response back from you. I know that your Heads of Planning already received an email from Matthew Winslow, our Service Manager – Strategic Planning & Housing Strategy on 17 January 2018 alerting them to my formal letter, so hopefully this has come as no surprise to you. Subsequently, I know our officers have been discussing how considered responses could, in turn, be structured given the South Essex 2050 work and the future Joint Spatial Plan that will no doubt seek to remedy these matters in the future on a more strategic basis.

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Basildon Borough Housing Land Supply Summary 2018

The Infrastructure, Growth and Development Committee accepted the scale of Objectively Assessed Housing Needs (OAHN) present for the Borough on 7 December 2017 and on 13 February 2018 agreed that this would be increased to account for the 51 pitches from ethnic Gypsies and Travellers, whose households no longer meet the planning definition and are therefore to be planned alongside all other housing needs. Basildon Borough is therefore planning for a need that stands slightly higher than the Strategic Housing Market Assessment Addendum 2017 at 19,491 to 19,771 homes by 2034.

When examining our land supply and the spatial options for addressing this growth, whilst it is the intention to strive to meet the needs in the Borough, this faces challenges of its own in respects of suitable sites and the practical realities of needing to phase development alongside infrastructure delivery. Once this is all accounted for, our evidence suggests we are only likely to be able to deliver around 15,000 new homes by 2034; which would be around 4,500-4,700 short of the OAHN range.

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Table 1 – Basildon Borough Spatial Land Supply 2018

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Scott Logan
Managing Director

Lyn Carpenter
Chief Executive
Thurrock Council

Date 20 February 2018
Department Planning Policy Team
Tel. No 01268 208045
E-Mail planningpolicy@basildon.gov.uk

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Shaun Scrutton
Managing Director
Rochford District Council

Date 20 February 2018
Department Planning Policy Team
Tel. No 01268 208045
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David Marchant
Chief Executive
Castle Point Borough Council

Date 20 February 2018
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The Infrastructure, Growth and Development Committee accepted the scale of Objectively Assessed Housing Needs (OAHN) present for the Borough on 7 December 2017 and on 13 February 2018 agreed that this would be increased to account for the 51 pitches from ethnic Gypsies and Travellers, whose households no longer meet the planning definition and are therefore to be planned alongside all other housing needs. Basildon Borough is therefore planning for a need that stands slightly higher than the Strategic Housing Market Assessment Addendum 2017 at 19,491 to 19,771 homes by 2034.

When examining our land supply and the spatial options for addressing this growth, whilst it is the intention to strive to meet the needs in the Borough, this faces challenges of its own in respects of suitable sites and the practical realities of needing to phase development alongside infrastructure delivery. Once this is all accounted for, our evidence suggests we are only likely to be able to deliver around 15,000 new homes by 2034; which would be around 4,500-4,700 short of the OAHN range.

We have reviewed our urban land supply and concluded we could deliver around 8,500 homes. Extra capacity has been identified from reviewing potential from windfall and brownfield sites and town centres, as well as reviewing urban densities. We have no land that is between the urban area and Metropolitan Green Belt that has not been considered and accounted for already. Our only other source of land supply to consider for meeting needs is therefore the Metropolitan Green Belt, which represents 63% of the Borough's land area and has not been reviewed since the mid-1990s. On considering the evidence, including our Green Belt Review 2017, the Infrastructure, Growth and Development Committee have determined that exceptional circumstances may exist to justify the release of Green Belt through several Strategic Sites located around the Borough's main towns and serviced villages. Capacity in these locations amount to around 9,500 homes. This can be seen in Table 1 below.

Location	Dwelling Provision	Nomadic Gypsy and Traveller Pitch Provision	Employment Provision
Basildon	9,220	29	41ha
Billericay	3,292	15	0.3ha
Wickford	3,624	15	0.9ha
Bowers Gifford	828	Safeguard existing authorised and tolerated	0
Other Serviced Settlements	104		0
Limited Green Belt Infill	145		0
Windfall	960		0
Total	18,180	59	42ha

Table 1 – Basildon Borough Spatial Land Supply 2018

Turning however, to the practical realities of what can be reasonably expected to be delivered, when we then look at what will be necessary in terms of infrastructure, particularly highways to the east of the Borough and in South West Billericay, we do not think it is defensible at Examination in Public to present a picture that all this development can be built in the 16 years which remain of the plan-period. As with many other Local Plans in England, our Local Plan will therefore need to set a staggered annual delivery target, which gradually increase over the plan period, reflecting when it is possible to bring Strategic Sites and infrastructure forward.

2017 – 2022	2022 – 2027	2027 - 2034
585pa	671pa	974pa

Table 2 – Proposed Annual Delivery Targets 2017-2034

The Infrastructure, Growth and Development Committee has therefore had to consider this issue and has agreed a series of mitigation measures that the Council would put into place, to continually push the delivery of new homes across the Borough. The measures that have been agreed in principle are:

- **Work closer** with SELEP, Essex County Council and Homes England and other infrastructure providers to bring forward in infrastructure necessary to enable delivery;
- **Prepare development briefs/masterplans** for sites where a coordinated approach may accelerate delivery;
- **Engage directly in delivery** where the Council has land interests or would benefit from acquiring a land interest;
- **Consider Permission in Principle** for less complex sites to help de-risk and bring forward sites more quickly; and
- **Optimise densities** to ensure efficient land use and not miss opportunities for additional homes.

I can assure you that with the exception of Permission in Principle, the practical implementation of which is still emerging from the Government, all of these mitigating actions are underway to one degree or another. You will be aware that I am currently in the process of restructuring the organisation to pull together all of the activities associated with delivering growth such as regeneration, strategic planning, development management and Sempra Homes under one Assistant Director. I believe that this will put Basildon Borough Council in a much better position to fulfil its ambitions and deliver the Local Plan's development programme, as well as effectively resource the South Essex 2050 work streams.

The Infrastructure, Growth and Development Committee also agreed on 16 January that it would revisit the consideration of any sites that it had determined in December 2017 that it was minded to omit from the Local Plan. This will require it to reconsider whether the sites could be otherwise be made suitable and sustainable by additional mitigation measures and whether the Green Belt's exceptional circumstances may apply to warrant boundary changes to close the unmet need gap. This will occur on 13 March 2018, when the final Local Plan is due to be considered for referral to Council for Regulation 19 consultation and submission.

In respects of how to handle the unmet housing needs issue, the Council has been mindful of the Essex Planning Officers' Association (EPOA) Mechanism for the Consideration of Unmet Needs Guidance, which was agreed on 7 December 2017. In applying the EPOA guidance, I am therefore writing to Castle Point, Rochford, Southend on Sea and Thurrock Councils, as the other four HMA authorities in South Essex, to seek your views on whether unmet needs can be met within the South Essex HMA in your authority area, and to determine whether that could be met by 2034 to fill the gap arising from Basildon Borough's expected delivery lag.

I hope that this summary helps to demonstrate that the Council is taking all steps to try and meet the Borough's OAHN, but owing to the identified land supply and delivery constraints, will struggle to do so by the end of the plan period.

I therefore request that you consider this further and provide a response no later than **5pm on 12 March 2018**. I should add that the response to this letter will be collated with other responses and published as part of the Council's Duty to Cooperate Compliance Statement.

The Council's Infrastructure, Growth and Development Committee will be considering the approval of the Publication Local Plan on 13 March 2018, together with Council on 22 March 2018, in line with our statutory timetable set out in the Basildon Borough Local Development Scheme 2017-2019. Given the shortness of time for the publication of reports for this Committee, verbal updates of your responses will be given to the Committee on 13 March 2018.

If you would like further information from my team to ensure you provide a considered response, please do not hesitate to get in touch.

Yours faithfully

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Scott Logan
Managing Director