



Basingstoke and Deane Local Plan Examination

**Issue 3:
Spatial Strategy and Housing Need**

On behalf of:
Gleeson Developments

Date:
September 2015

Reference:
GA/RW/03913/S002

ISSUE 3: Spatial Strategy and Housing Need

4. Spatial Strategy and Housing Need

4.1 *Are the overall vision, objectives and spatial strategy of the Plan, as set out in policy SS1 and the supporting text, based on a sound assessment of Basingstoke and Deane's demographic and socio-economic needs, environmental characteristics, existing and proposed infrastructure and relationships with neighbouring areas, in accordance with national policy.*

- 4.1.1 Insufficient evidence has been demonstrated that the LPA effectively worked with neighbouring authorities under the duty to cooperate. It has proceeded on the basis that it is a 'significantly self-contained' housing market, yet the 2015 SHMA identifies net in-migration and consistent interaction with Reading, West Berkshire, Test Valley, Wokingham and other neighbours.¹ A number of these authorities are either physically or environmentally constrained yet there is no clear evidence of collaboration with these authorities. Further evidence has been prepared by the Council in their Housing Needs Assessment (August 2015), which indicates that the highest levels of in-migration are from West Berkshire and Hart with overall levels of in-migration exceeding out-migration. The lack of jointly produced evidence and the concerns expressed about the HMA through consultation stages of the plan support our concerns that this should have been established at the initial stages of the plan rather than relying on a historic 2007 joint SHMA covering Winchester, East Hampshire, Test Valley and New Forest. It should be noted that the South East Plan identified Basingstoke as a growth point, recognising its good location relative to the strategic road and rail network providing strong ties to the Thames Valley authorities to the north/north-east.
- 4.1.2 This has resulted in a failure to identify unmet needs from neighbouring authorities and any overspill from London which is not considered. The plan does not therefore positively plan to accommodate these needs.
- 4.1.3 The housing needs figure of 850 dwellings per annum is startlingly consistent with the 853dpa figure identified in the Inspector's letter dated 19 December 2014, which despite being referenced as being based on 'robust assumptions' did not imply that this should be the OAHN for the Borough, rather it was a more appropriate starting point than the previous Council figure of 748dpa.
- 4.1.4 Subsequent papers published by the Council, including the recent Housing Needs Statement² which seek to retrospectively endorse this figure undermine the credibility of the Council's case that it has sought to positively plan for the demographic and socio-economic needs of the Borough and sought to significantly

¹ SHMA May 2015 paragraph's 2.17-2.18

² Basingstoke and Deane Council Housing Needs Statement, August 2015

boost the supply of housing in line with the NPPF. Indeed the recently published Housing Needs Statement confirm that based on advice from the NPPG (Ref: 2a-15) the starting point for calculating the Council's housing need figure is 936 dwellings per annum.³ This is however reduced by some 123 dwellings per annum based on the application of migration/demographic trends to a figure of 813 dwellings per annum.⁴ The NPPG (ID Ref: 2a-17) indicates that household projections produced by the DCLG are statistically robust and based on nationally consistent circumstances. While local changes might be justified, these must be clearly explained. It is not considered that adequate explanation has been provided as to why the CLG figures have been adjusted to such a great extent. The changes applied significantly constrain the housing needs figure against a background of increased overcrowding, an increase in concealed households, increased need for affordable housing and net in-migration. This is considered to be contrary to NPPF policy to boost significantly the supply of housing, meet full objectively assessed needs for market and affordable housing and deliver a wide choice of high quality homes.

4.1.5 This lack of credibility is further undermined when one considers the background of political resistance to increasing the housing target. This was made apparent when officers recommended an uplift to the target from 748dpa to 807dpa in January 2014, only for it to be rejected by members.

4.1.6 It is recommended that policy SS1 be adjusted to make greater provision for housing of around 17,000 homes over the plan period in line with the response provided below, and emphasise the role of the larger second tier settlements such as Oakley in meeting future housing needs.

4.2 *Is the Plan's assessment of the household needs for Basingstoke over the plan period (to 2029), as equating 850 dwellings per annum (dpa), (i.e an increase from the submitted plan figure of 748dpa expressed in the amended policy SS1 and in the Strategic Housing Market Assessment (SHMA) (PS/02/18), based on the most up-to-date and robust objective assessment of housing need (OAHN) for the Borough? In particular: (i) Are the Plan's migration, demographic change and household representative rates (HRR) assumptions realistic? (ii) Has an allowance for existing unmet housing need been factored in? (iii) What are the sustainability arguments for aiming for either the higher or lower end of range of housing requirements for the Borough?*

4.2.1 It is not considered the 850dpa housing figure represents a robust and objective assessment of housing need. The background described above suggests this figure has reluctantly been included on the advice of the Inspector as the minimum figure to be accepted.

4.2.2 The Edge Analytics Report (April 2015), appended to the May 2015 version of the SHMA incorporates DCLG 2012 headship rates. It confirms that the latest 2012 figures suggest natural change, net internal

³ Basingstoke and Deane Council Housing Needs Statement, August 2015.paragarph 3.1.3

⁴ Basingstoke and Deane Council Housing Needs Statement, August 2015.paragarph 3.4.1

migration and net international migration will all have a positive impact on population growth. Incorporating these figures with the Jobs led 600 scenario indicates an annual average dwelling target of 939dpa.

4.2.3 The jobs target of 600 is within the target employment range of 450-700 proposed in the Local Plan and despite this report the Council's housing target remains consistent with that put forward by the Inspector in his letter dated December 2014.

4.2.4 The Council should increase its housing target to reflect this updated evidence unless it can demonstrate that the social and economic benefits of increasing the housing target to c. 939dpa would be outweighed by adverse, environmentally damaging impacts.

4.3 Have the 2012 based household projections brought about any amendments to the OAHN?

4.3.1 Please see response to question 4.2.

4.4 In terms of the previous rates of housing delivery and the delivery target(s) that have been in place in recent years, should the appropriate 'buffer' to ensure choice and competition (as set out in the Framework para 47 [2]) be 5% or 20%? Should this buffer be factored in over the first 5 year period or for the plan period as a whole?

4.4.1 The Council's Housing Topic Paper Oct 2014 indicates that over the past 10 years there have been a total of 8,816 homes⁵ completed (2004-2014). Set against targets from the adopted Local Plan of 937dpa for the period 2004-2006, 945dpa from the SEP for the period 2006-2013 and 850dpa for the year 2013/2014 gives a total target of 9,339 homes. These annual targets were only achieved in three years over that period with a cumulative shortfall against adopted targets of 523 dwellings.

4.4.2 The Council figures on housing completions show a sharp contrast between strong housing growth in the period between 2007-2010 with over 1200 homes completed in each of these years with a significant drop-off since with completions of 805 (10/11); 693 (11/12); 303 (12/13) and 531 (13/14), due in no small part to the lack of an adopted plan and a failure to grant planning permissions. Overall this is considered to represent a persistent record of under delivery for the purposes of the NPPF and an additional buffer of 20% should be added to seek to address these recent and significant shortfalls.

4.4.3 The buffer should be factored in over the first 5 year period of the plan in accordance with the NPPG Ref ID: 3-035-20140306.

⁵ Housing Topic Paper, October 2014, paragraph 5.33

4.7 *In relation to the Framework para 47 [1], is the Basingstoke and Deane Housing Market Area (HMA), as defined by the Borough boundary, the most appropriate 'building block' for assessing the area's housing requirements? Is there a case for Basingstoke's housing need (and therefore housing provision) to be assessed over a wider area than the Borough Boundary, and if so which area?*

4.7.1 The updated SHMA at paragraph 2.41 references the strong housing market dynamics between Reading, Bracknell, Maidenhead (Windsor and Maidenhead), Newbury & Thatcham (West Berks), Slough and Wokingham. Further evidence has been prepared by the Council in their Housing Needs Assessment (August 2015) which indicates that the highest level of in migration is from West Berkshire and Hart, with overall levels of in-migration exceeding out-migration. Accordingly further up to date work needs to be undertaken to investigate the extent to which the area to the north and east of Basingstoke and Deane act as a single HMA, together with joint working on the level of unmet housing needs in these areas and any requirement to accommodate overspill from London.