
Basingstoke & Deane Local Plan Examination

Issue 3 – Spatial Strategy and Housing Need

Further Statement on behalf of Gleeson Strategic

Respondent ref: 816809

Further Statement to the Basingstoke and Deane Draft Local Plan

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1. Introduction

- 1.1. This Hearing Statement has been prepared by Savills on behalf of Gleeson Strategic ('**Gleeson**') in respect of its interests on land to the north of Sherfield Road, Bramley, herein after referred to as '**the Site**'¹. It sets out representations in response to Issue 4 of the Hearings Programme relating to the Examination of the draft Basingstoke and Deane Local Plan ('**the BDLP**').
- 1.2. The purpose of this Statement is to submit further representations to assist in discussing the questions raised by the Inspector.
- 1.3. This Statement should be read in conjunction with both our previous representations to the draft BDLP and the separate Hearing Statements being submitted on behalf of Gleeson in response to Issues 4 (Other Housing Matters) and 6 (Omission Sites) of the BDLP Examination.

¹ The Site is also known as Land at Strawberry Fields which has been assessed in the Strategic Housing Land Availability Assessment under reference BRAM010.

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2. Overview

- 2.1. As set out in our representations in respect of Issue 6, it is our view that our client's site to the east of the urban area of Bramley is capable of an appropriate expansion in a sustainable manner. It is further contended that this is entirely within the stated spatial strategy of the BDLP and fully in accordance with meeting the housing needs of the area. The Site's omission from the BDLP is unsound because it means that the Plan does not represent the most appropriate strategy, as required by paragraph 182 of the National Planning Policy Framework.
- 2.2. In previous representations before the Inspector, we have expressed disappointment that the Council has made strenuous efforts to interpret various studies of housing need and employment growth as supporting the lowest possible growth for the plan period. We do not feel that recent publications from the Council (dated August and September 2015) change that approach. Furthermore, we feel that the additional allocations proposed in the Main Modifications follow an approach where they are to be few in number and large in scale, directed solely to Basingstoke rather than being proportionately distributed to both Basingstoke and the identified sustainable settlements elsewhere (in line with the previous spatial strategy of the Plan). This, in our view, unbalances the spatial strategy and harms its soundness unnecessarily.
- 2.3 With this overview as our guiding principle, the remainder of this document responds to each of the questions raised by the Inspector.

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3. Response to Questions

“4.1 Are the overall vision, objectives and spatial strategy of the Plan, ... based on a sound assessment ... in accordance with national planning policy?”

- 3.1. We take no issue with the Council’s assessment of its own needs and constraints as set out in the commentary of this part of the Plan. However it is when the needs are translated into proposed numbers, in the face of detailed evidence, that we feel a flaw is created in the Plan. Given that policy SS1 is the main mechanism for delivering the vision, objectives and spatial strategy, we feel that there is a disconnect between the ambition for the area and the amount of development proposed. As our concerns relate directly to the Inspector’s question 4.2, we have set this out in detail below.

“4.2 Is the Plan’s assessment of the household needs for Basingstoke over the plan period (to 2029), ... based on the most up-to-date and robust objective assessment of housing need (OAHN) ...”

- 3.2. In providing revised Strategic Housing Market Assessment (SHMA 2015) evidence earlier this year, the Council reveals a determination to dampen down requirements for housing. The suggested policy to provide 850 dwellings per annum (pa) is at the lower end of the expectations from demographic modelling work and expected annual employment growth. Nevertheless, the SHMA 2015 document also reveals that there is a case to consider a higher annual rate which at the very least deals with the potential drivers for demographic change within the area (the most up-to-date projections suggest that 915 new households pa will be formed in the Plan period). Add to this the economic development ambitions of the Plan, the evidence justifies an increase beyond 850 pa to up to 1000 units pa.
- 3.3. The explanation provided by the Council for dampening down the requirement is contained in the Council document PS/02/43 Updated Housing Land Supply Statement published on the 28th August 2015. This document, inter alia, refers to the National Planning Policy Guidance (NPPG) for how to deal with unmet need as may be suggested by considering local market signals. Of the market signals suggested in the NPPG – land prices, house prices, rents, affordability, rate of development and overcrowding – none are convincing as reasons for not considering a need to deal with repressed need. The premise of the analysis in the document is that if Basingstoke and Deane is no worse or slightly better than its neighbours, than this is sufficient to do nothing. This is considered to be a flawed premise as it merely reinforces the repressed need nationally and in adjoining authorities.
- 3.4. Nevertheless, it is agreed that the method attempted by the Council is the approach suggested by the NPPG, but it must express the absolute not the relative impact of increasing house prices, rents, affordability and overcrowding as a number of households that are hidden and in need of further housing delivery. The rate of past delivery as indicated does offer some comfort that increasing the rate above 900 units pa is achievable as it has been in the past.

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3.5 The higher development scenario has been partially tested through the Sustainability Appraisal process: most recently in an April 2015 update reference PS/02/16. The 1000 dwelling pa option was not thoroughly considered as it pre-assumed that such a higher rate would be unacceptable. However, there is sufficient evidence to suggest that there are no insurmountable obstacles to a delivery to this level with the appropriate environmental mitigation and infrastructure provision. Indeed, the Council have repeatedly referred to infrastructure provision as a constraint to housing numbers but this does not accord with footnote 9 of the NPPF which sets out the specific circumstances in which it may be appropriate for an LPA not to provide for its full objectively assessed housing needs – infrastructure provision/delivery is not listed.

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

3.6 See above.

“4.4 In terms of the previous rates of housing delivery ... should the appropriate ‘buffer’ ... be 5% or 20%? Should this buffer be factored in over the first 5 year period or for the plan period as a whole?”

3.7 We believe there to be persistent under-delivery in the Borough and therefore a 20% buffer is supported. In line with guidance in the NPPG, and given the current deficiency in the five year housing land supply, it is especially important that this is factored into the first five years of the Plan period. The Plan is reliant on a small number of large (400+ unit) sites, focussed at Basingstoke, which would exacerbate the difficulty of factoring this buffer into the first five years, e.g. due to infrastructure requirements. However, this would be possible if there were an allocation of smaller sites (c.200 units), where these are unconstrained and can deliver quickly. This includes our clients site at Bramley, which is one of the five second tier settlements of the area already identified as being appropriate for growth. .

“4.5 Are the forecast job growth figures for the Borough realistic? ...”

3.8 We make no comment.

“4.6 What other factors should be taken into account in determining the overall housing provision...?”

3.9 We make no comment additional to the above.

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“4.7 ... is the Basingstoke and Deane Housing Market Area ... the most appropriate ‘building block’ for assessing the area’s housing requirements? Is there a case for [the] need ... to be assessed over a wider area than the Borough... ?

- 3.10 The matter has been made unnecessarily complex by the changing of the HMA over time where the current HMA’s predecessors covered a larger area. However, the issue is less about whether the HMA boundary has been appropriately limited to the Borough boundary and more about whether, given the decision to limit the boundary, whether there are mechanisms in place to consider cross-boundary need robustly and a recognition that unmet need from areas outside the Borough should be accommodated.
- 3.11 It is our view that the Borough is part of a much wider housing need context which must include not only the housing needs of more constrained neighbours but also London itself.
- 3.12 To take an example, the Mayor of London has warned that the capital will be unable to meet its own future needs and that the wider south-east may need to assist. Nathaniel Lichfield and Partners undertook an assessment of London unmet needs in April 2014 (entitled London’s Unmet Housing Needs - Meeting London’s overspill across the wider South East - April 2014). This included a review on the potential impacts for Councils in the south-east. Basingstoke and Deane was one of the 84 districts considered. This assessment concluded that whether or not the greenbelt is considered to be a constraint, Basingstoke and Deane should be considering, over the ten year period assessed, a possible share of London’s unmet need. This could be expected to be in the low hundred per annum depending on the scenario modelled.
- 3.13 Whilst it is appreciated that considering such a wider market area may involve a debate beyond the realistic remit of this Examination, it does illustrate the point that the Council has not provided evidence that it has properly considered the wider picture of need, regardless of where the HMA boundary lay.
- 3.14 However, it may be appropriate to improve the soundness of the Plan by allocating a suitable contingency within the plan and to allocate a range of smaller sites (e.g. 200 units or less) that are unconstrained in terms of planning policy and infrastructure and therefore can quickly be brought into play when required.

“4.8 In relation to policies CN1 and CN2, does the household needs assessment for Basingstoke and Deane fully take into account the Borough’s affordable housing needs?”

- 3.15 As stated above, the NPPG requires plan makers to show regard to market signals and this includes the signals on affordability. The more significant the affordable housing constraints are, the larger the supply response should be. Despite evidence in the SHMA that affordability is worsening, the document concludes that it is not necessary to respond because the Borough “...has not experienced any worsening of affordability compared to neighbouring authorities.” (SHMA 2015 pp 121). Again we make the point that unaffordability needs to be dealt with as a policy for the Borough, not avoided in the face of the difficulties experienced by neighbouring Councils.

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3.16 We note the position recently published on the 28th August in respect of the Council's approach to incorporating affordable housing into the housing needs calculation. We will be examining the details of this prior to the relevant Hearing day and reserve our views until we are in a position to comment fully.

“4.9 Regarding policy CN4, ...”

“4.10 Is policy SS2, ...”

3.17 We have no comments.

“4.11 Should the Local Plan include a policy which states that, should the Plan's monitoring indicates that an ongoing 5 year deliverable and a subsequent 5 year supply of developable housing land can no longer be sustained within the Borough, the Council will review its housing land provision and bring on-stream additional housing areas as required? Should such a policy encourage the reuse of previously developed land?”

3.18 We agree that such a policy will be in the interests of the soundness of the Plan as it introduces flexibility in responding to housing demand as it emerges without the need for lengthy and expensive reviews of the Plan itself. However, this policy can only be effective if the Plan is provided with a substantial contingency allocation and the identification, within the overall strategy of the Plan, of a variety of smaller sites.

3.19 Our notes of the exploratory meeting prior to these hearings indicate that there was some debate on the provision of a contingency “buffer”. Such a buffer could then form the basis of such a policy as described in the question. This appears to have been interpreted by the Council as meaning that it can use the contingency previously built into the Plan as a way of reducing the need for new allocations in the face of the decision to plan for c.850 dwellings per annum (dpa). Notwithstanding our view set out above that the overall housing numbers should rise, a separate contingency should be identified and re-instated for use by the policy.

3.20 In addition, it is necessary for specific sites to be identified and the basis for their release clearly scheduled. Otherwise, there is a danger that in the delivery of sites, the Plan's focus on the main towns, including Bramley, would be lost to the detriment of the intended strategy. In this instance, smaller sites can come on-stream more quickly to respond to changing circumstances and should therefore be prioritised above large scale sites and/or brownfield sites (unless it can be shown that these are available and developable within a shorter timeframe) to meet the Council's current housing land supply deficiency and address the backlog within the first five years of the plan period.

“4.12 In relation to policy SS4, ...”

3.21 We make no comments.

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“4.13 Is the Plan overly reliant on sources of development land for new homes, ...”

- 3.22 In the attempt to simplify the response to a criticism about under-estimating housing need, the outcome has been to propose a few larger sites at Basingstoke (in the ‘Main Modifications’ to the Plan, consulted on earlier in 2015). The Plan is therefore now unbalanced and has deviated from the spatial strategy of the Submission Plan. This weakens its deliverability by adding a further potential delay due to the lengthy lead-in times for such large schemes (such as Hounsome Fields) but also ignores the potential for sites such as our client has at Bramley for providing sustainable developments in the rural settlements, commensurate with any increased level of growth at Basingstoke. Should the Inspector consider that further housing growth (above the 850 dpa) is necessary then, whilst it may be appropriate to consider additional allocations at Basingstoke, these should always be balanced with proportionate increases in the rural settlements to maintain the spatial strategy.

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