

## **BASINGSTOKE & DEANE LOCAL PLAN EXAMINATION ISSUE 1: LEGAL REQUIRMENTS & DUTY TO COOPERATE**

### ***2. Duty to cooperate (DTC)***

#### ***2.1 Has the Council worked collaboratively with other authorities and organisations during plan preparation on strategic planning matters that cross administrative boundaries?***

The Council has provided evidence from Rushmoor and West Berkshire Councils that they are supportive of the revised objective assessment of need for B&DC of 850 dwellings per annum. These are the emails dated 18 June 2015 and 22 June 2015.

The SHMA Update of May 2015 states in paragraph 2.78 that a Local HMA based on Basingstoke & Deane Council (B&DC) itself 'provides the best basis for what might be a sensible geography'. This point is reiterated in paragraph 2.0.1 of the Housing Needs Paper of August 2015. The implication from this is that B&DC can justify its decision to plan without regard to the methodological assumptions being used by other districts to assess the OAN. B&DC is an HMA in and of itself. It is not part of a wider group of local authorities making up an HMA.

The HBF finds this a little surprising as earlier studies attempting to define HMAs done by the NHPAU and the South East Plan – studies that the SHMA Update had referred to – identify B&DC to be part of an HMA titled 'Reading' consisting of 11 local authorities (NHPAU – see paragraph 2.73 of the Housing Needs Report). In contrast the SEP identified B&DC as falling within the 'North Hampshire M3' HMA.

One of the Council's arguments to justify its decision to plan in isolation from wider housing influences relates to the degree of self-containment in a district. The rule of thumb applied is that a self-contained district can be defined as one where at least 70% of household moves occur within the district. As the Council admits, the extent of self-containment in B&DC is borderline. Self-containment of the resident population is 66% only rising to 68.9% once commuters to the Atomic Weapons Establishment (AWE) in West Berkshire are counted as being self-contained on the basis that they commute from nearby Tadley that is close to the AWE base (see paragraph 2.2.2 of the Housing Needs Statement). Even if this is factored-in this still does not achieve the 70% threshold.

Footnote 4 on page 7 of the paper acknowledged that the ONS does not classify B&DC as a stand-alone Travel to Work Area.

Paragraph 2.4.1 of the same paper observes the inter-connections with neighbouring authorities. In our representations back in June 2014 we said that we consider that a sensible HMA would be one based on West Berkshire, Reading, Slough, Windsor & Maidenhead, Bracknell Forest and Wokingham. The SHMA notes that the migration

flows between B&DC and West Berkshire and Wokingham are very strong (23.1% and 10.4% respectively). B&DC must as a minimum have regard to the planning issues in West Berkshire and Wokingham in developing its local plan.

In the light of these issues we do not consider it is credible to regard B&DC as a self-contained district for planning purposes and one immune from the wider demographic influences at play across the greater south east including London. Paragraph 2.17 of the SHMA notes the influence of net in-migration from London and the Blackwater Valley (Surrey).

We accept that an HMA based on the NHPAU area may be too unwieldy as paragraph 2.78 of the SHMA Update states. Also new HMA working relationships are already coalescing elsewhere, and it would be too late for B&DC to join-in in terms of producing a combined SHMA. Nevertheless in view of the work done to date by the M3 Enterprise LEP in preparing its business plan (*Strategy for Growth*, May 2013), we consider that it is necessary for the OAN for B&DC to at least have regard developments elsewhere within the sub-region. The demographic modelling work for B&DC should at least consider how the effects of under-provision in London, Berkshire and Surrey will impinge on housing need in B&DC. Furthermore, since the favoured demographic scenario for Basingstoke (813 dpa) is based on some questionable assumptions about future migration flows, the implication of this assumption need to be properly understood and agreed by Basingstoke's neighbours so that they will increase supply to compensate for Basingstoke's discounting. If these people are not going to move to Basingstoke, where will they go?

It should be noted that Basingstoke provides a relatively cheaper location for people to live compared to London, Berkshire, Surrey (the Blackwater Valley). Given the degree of housing stress in London people will look to B&DC increasingly as a place to live that is relatively affordable. There is no evidence in the plan that these issues have been adequately explored.

***2.2 In particular has the Plan's approach to determining its housing requirements and provision been compatible with that of neighbouring authorities?***

The Council has explained in its new *Housing Need Paper* that it considers itself to be self-contained district and therefore there is no need to align its housing and demographic work with the neighbouring authorities. We do not consider this to be right in view of its association with the M3 LEP area and the evidence of travel to work and migration flows with West Berkshire in particular but also Berkshire more generally. Table 2.7 in the SHMA shows that the number of people travelling from B&DC to work in West Berkshire is significant. It also shows that people commuting from B&DC to other Berkshire authorities exceeds the numbers who travel into B&DC from Berkshire. We therefore conclude that the earlier NHPAU work that orientated B&DC towards Berkshire rather than Hampshire was probably robust.

We have referred before to the unmet need in West Berkshire and the need for that Council to review its plan. The evidence that informed West Berkshire's Local Plan

pointed to a need to accommodate 16,000 households even though the plan provide for only 10,500. There is, consequently, a shortfall of some 5,500 dwellings. West Berkshire's Plan was found sound and adopted in 2012 with the proviso that it was revised in three years' time. The papers in relation to the duty to cooperate make no reference to this issue and the programme of review. The scale of the shortfall in West Berkshire will have demographic consequences for B&DC. This calls into question the reliability of an approach that treats B&DC in isolation from elsewhere.

We have discussed the migration assumptions that inform B&DC's local plan in matter 3. By supporting an OAN of 850 dpa West Berkshire Council is effectively saying that it supports B&DC's migration assumptions. This will have consequences for West Berkshire when it comes to reviewing its local plan since it will need to deal with the consequences of the B&DC planning for less inward migration.

Wokingham's adopted local plan of 2010 under-provides significantly against the official DCLG projections. As a relatively constrained authority in environmental terms it would be unlikely that a new NPPF-based local plan would be able to meet a new OAN in full. This is likely to mean that more priced-out Londoners will leap-frog Wokingham to live in B&DC. Like West Berkshire, Wokingham will need to compensate for Basingstoke's migration assumptions.

### **2.3 Has the Council worked or liaised with the relevant bodies set out in the PPG? How has the Council also co-operated with the relevant Local Enterprise Partnership (LEP)?**

Our chief concern is with the Council's judgement that the district is self-contained and therefore justified in planning without reference to events elsewhere in the defined LEP area. This could have difficulties in terms of aligning plans for employment and housing. The LEP's *Strategy for Growth*, May 2013, observes on page 12 that the economy of the Enterprise M3 LEP is diverse and highly interdependent. Page 25 of the document notes that "*A stable and flexible housing market is essential to a healthy and productive economy. Housing market imbalances between supply and demand are a potential brake on economic development, as the cost and availability of housing influences the geographical distribution and mobility of the labour force and may affect capacity levels in local labour market.*"

Figure 2.9 in the report maps the affordability of housing across the LEP area.

The argument in the LEP report means that it is necessary for B&DC to look further afield than its own district towards the bigger picture in the sub-region. Even if B&DC is judged to be meeting its own OAN for housing in full, it would be necessary to consider how other districts in the LEP are faring. If these other districts are facing significant problems of housing undersupply compared to need – because, for example of the effect of higher-tier designations such as the Green Belt, Thames Basin Heath SPA, New Forest National Park etc on restricting land supply – then this will have implications for the success of the LEP business strategy if across the LEP area as a whole insufficient housing can be provided to maintain the required labour

supply. This analysis is missing. It is hard, therefore, to conclude whether B&DC is making an appropriate contribution towards supporting the LEP growth plan.

The LEP report says that it will “*advocate the objectively assessed requirement for a growth in housing to support the development of the local economy*”. It is unclear what has happened in this respect since the report was written. We note paragraph 5.1.8 of the *Housing Needs Statement*. This states that the jobs target in the LEP report does not provide location-specific targets for each constituent district. The *Housing Needs Statement* therefore confirms that the work on aligning employment and housing provision among the authorities in the LEP area that was promised in the LEP report has not been undertaken. Without this break-down it is hard for third-parties to understand if B&DC would be providing enough housing to help maintain the labour needs of the M3 LEP.

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