

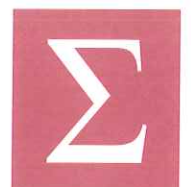
**BASINGSTOKE AND DEANE LOCAL PLAN
EXAMINATION**

ISSUE 3

**SPATIAL STRATEGY AND HOUSING NEED
7/8 OCTOBER 2015**

**REPRESENTATIONS ON BEHALF OF RYDON
HOMES LTD**

SEPTEMBER 2015



Response to Inspector's Questions

- 4.1 The overall vision only includes providing new homes to meet local needs. This is an unnecessarily introvert vision and doesn't encompass meeting external needs arising from in-migration and regional needs from adjoining constrained Districts and un-met housing need in London. The spatial strategy for the District, which is not extensively constrained, should be more expansive and the vision should reflect this.
- "new homes to meet in full the need for market and affordable housing in the housing market area"
 - Policy SS1 d) - the number of houses planned to be achieved from allocated Greenfield sites requires to be increased to meet the full OAHN figure
 - Policy SS1 e) - a target figure for Neighbourhood Planning should be inserted
- 4.2 The household needs assessment is being kept up-to-date with the benefit of the Inspector's intervention and Edge Analytical's 2015 up-date but it still requires to reflect new demographic information as it is published. However it is not robust because where OAHN is expressed as a range, figures at the lower end are selected without clear justification, thus putting at risk the achievement of Government objectives to boost significantly the supply of housing and meet OAHN in full. The Edge 2015 Report suggests a range of 813-936 dpa (mid-point 876) which shows a trend of increased requirement from the 2011 based projections. This reflects the fact that the earlier projections are widely acknowledged to have been unduly influenced by the National recession and future provision should be made to accommodate a period of economic growth and new job creation. The supply and cost of housing should not be a constraining factor on such growth and judgements should therefore be exercised to accommodate the most positive of the likely scenarios rather than to seek to limit housing provision through un-necessary caution.

The SA – Option 4 High Growth – concludes:

"This option would provide in the region of 1,000 dwellings per year until 2029 and is based upon in-migration as well as also affordable housing needs. This would help deliver the adopted Vision, but moves away from the feedback from the housing consultation. It is expected that this high level of growth would meet future housing needs and provide a high level of affordable dwellings per year.

Option 4 is likely to have the highest environmental impact due to increased development, more use of Greenfield sites and potentially the most implications due to climate change. However, this option is more supportive of economic growth and investment in infrastructure, the provision of a wider choice of housing, and support for services."

The reason for not adopting this option is that it "moves away from the feedback from the housing consultation" but there is no other specific constraint. Public opinion, expressed through consultation, will rarely be supportive of the more expensive decisions necessary to achieve economic and housing growth. Greenfield sites are required but careful site selection and high quality development make such sites sustainable.

It is therefore a reasonable conclusion that an annual housing delivery rate of 1000 dpa is a sustainable and achievable approach.

The SHLAA identifies a supply of suitable housing land including:

Completions 2011-2014	-	1527
Sites with planning permission Allocations, Opportunity, Regeneration, small site		
Windfalls	-	6829
Greenfield – Cat 1	-	<u>9587</u>

TOTAL 17943

There is therefore a readily identifiable supply of land available to support an annual completion rate of 1000 dpa over the Plan Period. The Plan should therefore aim at the higher end of the range of housing requirements for the Borough

- 4.3 The 2012 based household projections have confirmed a trend of increased household requirements that was suppressed during the period of recession when new households were unable to form naturally. The 2012 projections therefore form a more reliable and robust basis for projecting OANH but, they are probably still on the conservative side because national migration is increasing, London is increasingly incapable of accommodating its own housing need and the effects of the economic recovery are beginning to feed through into the DCLG projections.
- 4.4 A 20% buffer should be used and the Sedgfield approach is preferred. Completions over the past 4 years have been:

2010/11 805
2011/12 693
2012/13 303
2013/14 531

All of which are considerably lower than the current OAHN figure – even of 850 pa and much lower than the SE Plan figure of 945 pa which applied in the interim. The three years 2007-2009 when completions were over 1000 pa demonstrate that this level of completions can be achieved but the three years preceding that were all below the SE Plan figure. Three years out of ten is not sufficient to justify a 5% buffer. The shortfall needs to be made up as quickly as possible and readily deliverable sites should be identified. The Council put their underperformance down to the period of recession but this is only part of the story. The absence of a good quality deliverable supply of housing land was, and remains, the most influential factor.

- 4.5 Job growth of 600 pa supported by a housing range of 936-103p6 is set out in the Edge Analytical Report of 2015 would appear to be the most appropriate and achievable positive contribution.
- 4.6 Market signals indicate that the housing market, although traditionally lower-priced in Basingstoke than more attractive surrounding areas and Districts, remains strong and house prices are increasing. There has been historic suppression of household formation rates both from the national economic situation and the lack of an adequate 5 year land supply on an ongoing basis. These, indicators suggest future housing provision should be at the higher end of the projection ranges in order to ensure that availability of land for housing is never a constraint on the delivery of housing in the Plan Period.
- 4.7 Rydon note the Council's conclusion that Basingstoke forms a self-contained HMA but this has not always been the preferred conclusion and strong individual commuting and travel links with surrounding Districts suggest a wider area of influence and market interaction. Again as a comparatively unconstrained District it is important that Basingstoke plays its part in meeting the needs of a wider market area including more constrained Districts and London.
- 4.8-4.10 Rydon have no position on Affordable Housing (apart from the importance of having an adequate overall housing supply to facilitate the delivery of this vital component of meeting OAHN) or specialist housing or regeneration.
- 4.11 The 5 year housing land supply should be constantly monitored and subject to reviews in accordance with National Policy. Action to remedy any deficiency needs to be taken promptly and effectively. A Review of Local Plan Policy and Allocations is too ponderous to be an effective remedy and an interim policy to

encourage short-term housing land release is preferable. The re-use of pdl should always be encouraged but not to the point where it inhibits the delivery of other housing sites.

4.12 Rydon do not have confidence in the Council's claim to have a current 5 year supply of housing land or in their ability to maintain such a supply throughout the plan period. Their concerns arise from:

- the claim is based on an unrealistic requirement figure, below OAHN
- a number of sites with planning permission, including brownfield and other sites have been slow to come forward and cannot be relied upon to deliver at the Council's expected rates
- a number of the new, proposed housing allocations are on very large sites, which require infrastructure provision and have long lead in times. There is a shortage of smaller identified, unconstrained sites that can be delivered quickly. The supply is therefore unbalanced and inflexible.

4.13 As indicated above, the balance and mix of housing sites can be improved in order to make the delivery of housing more effective, prompt and certain. Village development can be sustainable and helpful to the rural economy of retaining and enhancing rural services. This is increasingly gaining support of Government and the increase of housing provision at villages, commensurate with their size, character and service provision, is one way that the current over-reliance on pdl and large neighbourhood sites on the urban periphery can be reduced.