

Basingstoke and Deane Borough Council Local Plan Examination

Statement of Common Ground

5 year land supply

Inspector's Supplementary Question

There is considerable doubt expressed by several representors that Basingstoke and Deane has a 5 year housing land supply. In particular, the following points are made: (i) there has been persistent under-delivery, so a buffer of 20% should be factored in, to be brought on-stream in the first 5 years; (ii) there is an over-reliance on large sites, which recent research shows conclusively are slow to deliver for several reasons, including major infrastructure requirements; (iii) disagreements over the implementation rates for sites with different planning status and for specific sites. In view of the importance of the first 5 years to the soundness of the LP, it would be helpful if a statement of common ground (SCG) could be prepared between the Council and key participants from the house building industry, perhaps coordinated by the HBF.

The SCG should set out to agree the following:

1. The annual housing requirement (based on 850 dpa and/or a range).
2. The 5 year requirement.
3. The start date for assessing the 5 year supply.
4. The housing targets for previous years, say over the last 10 years.
5. A completions rate, according to planning status).
6. Whether a 5% or 20% buffer should be applied.
7. Whether the buffer should be applied to any previous under-delivery.
8. What were the past completions?
9. What are the current commitments?
10. Assumptions over LP allocations and windfalls.

Topic	BDBC	Objector 1		Objector 2		Objector 3	Objector 4
Name of Agent		Savills	Savills	Nexus Planning (ID:909792)	Nexus Planning (ID:909792)	Woolf Bond	
Name of Objector		Mr & Mrs Bowater	Mr and Mrs Bowatter	Taylor Wimpey	Taylor Wimpey	Dandara	Gladman Developments
The annual housing requirement (based on 850 dpa and/or a range).	850 dpa	850 (for comparative purposes to LPA position)	936 (SNPP projections)	850 dpa	1,100 dpa	850 to be expressed as the Council's adjusted housing target being proposed through the Local Plan. BDBC should explain why they are not planning for a higher annualised requirement of circa 936dpa ¹ treated as a minima being the DCLG household projection starting point for the B&D OAN.	At least 1,050 dpa based on the findings of Regeneris Consulting's OAN assessment
The 5 year requirement.	4,250 (850x5) Plus 5% = 5,009 (with 5% added to the shortfall) and 4,983 (with 5% not added to the shortfall)	Sedgefield Approach with 5% Buffer Shortfall (2011 – 2015) - 1,449 Baseline Req'ment (15 – 20) 4,250 Baseline Req'ment plus 5% buffer 4,463 5 year Req'ment (inc shortfall) 5,912 Annual Requirement 2015 – 2020 1,182 dwellings Sedgefield Approach with 20% Buffer Baseline Req'ment plus 20% buffer 5,100	Sedgefield Approach with 5% Buffer Shortfall (2011 – 2015) -1,793 Baseline Req'ment (15 to 20) 4,680 Baseline Req'ment plus 5% buffer 4,914 5 year requirement (inc shortfall) 6,707 Annual Requirement 2015 to 2020 1,341 dwellings Sedgefield Approach with 20% Buffer	4,250 (850x5) 5,100 (with 20% NPPF buffer applied) 6,549 (with shortfall applied) 5-year requirement between 2015/16 and 2019/20: 6,549 dwellings	5,500 (1,100x5) 6,600 (with 20% NPPF buffer applied) 9,049 (with shortfall applied (2,449 based on 1,100dpa between 2011/12 and 2014/15)) 5-year requirement between 2015/16 and 2019/20: 9,049 dwellings	6,549 ²	5,250 based on Regeneris Consulting's OAN assessment, plus 2,249 dwellings for previous shortfall (2011/12-2014/15)

¹ Housing Needs Statement (Aug 2015), para 3.1.3.

² See Table at Para 38 of our Issue 3 Statement. This figure is expressed as a minimum based upon BDBC's untested 850dpa. Our figure also includes the shortfall accrued since the 2011 base date, the Sedgefield methodology and a 20% buffer.

		Baseline Req'ment (inc shortfall) 6,549 Annual Requirement 2015-2020 1,310 dwellings	Baseline Req'ment plus 20% buffer 5,616 Baseline Req'ment (inc shortfall) 7,409 Annual Requirement 2015 – 2020 1,482 dwellings				
The start date for assessing the 5 year supply.	1/4/15 for current land supply position	1/4/15 for the supply.	1/4/15 for the supply.	1/4/15 for current land supply position	1/4/15 for current land supply position	1/4/2015	01/04/15 for current five year period 01/04/11 for calculating past shortfall
The housing targets for previous years, say over the last 10 years.	Set out in Updated Housing Land supply statement (figure vii) page 14) (PS/02/43) 2005/06: 804 2006/07: 825 2007/08: 825 2008/09: 825 2009/10: 945 2010/11: 945 2011/12: 594 2012/13: 770 2013/14: 748 2014/15: 850			2005/06: 804 2006/07: 945 2007/08: 945 2008/09: 945 2009/10: 945 2010/11: 945 2011/12: 850 2012/13: 850 2013/14: 850 2014/15: 850 Shortfall since 2011/12 (the start of the Local Plan period) being 1,449	2005/06: 804 2006/07: 945 2007/08: 945 2008/09: 945 2009/10: 945 2010/11: 945 2011/12: 1,100 2012/13: 1,100 2013/14: 1,100 2014/15: 1,100 Shortfall since 2011/12 (the start of the Local Plan period) being 2,449	Set out in Table 1 at para 14 of our Issue 3 Statement. We have applied the SE Plan housing target up to 2012/13 as the relevant Development Plan document in place during the monitoring years and the Council's emerging 850 dpa subsequently notwithstanding our concerns regarding the soundness of this figure.	804 dpa for 2005/06 in accordance with Hampshire County Structure Plan 945 dpa for the period 2006/07 – 2010/11 in accordance with South East RSS 1,050 dpa for the period 2011/12 – 2014/15, in accordance with Regeneris Consulting OAN evidence
A completions rate, according to planning status.	Site by site rates outlined in appendix 1 of the Updated Housing Land supply Statement PS/02/43	See Non-Implementation Assessment, which amends that set out within Appendix 1 of PS/02/43	See Non-Implementation Assessment, which amends that set out within Appendix 1 of PS/02/43	Completions rate is dependent on numerous site by site factors. However, maximum of 200 completions per annum on a large strategic allocation with multiple housebuilders operating simultaneously is considered ambitious be achievable.	Completions rate is dependent on numerous site by site factors. However, maximum of 200 completions per annum on a large strategic allocation with multiple housebuilders operating simultaneously is considered ambitious be	Set out in Table 1 at para 14 of our Issue 3 Statement.	Likely completion rates need to be based on empirical evidence, past delivery performance and factors that may affect or delay delivery in the future. This is a matter for further discussion at the Examination hearings

					achievable.		
Whether a 5% or 20% buffer should be applied.	5%	5% and 20% shown	5% and 20% shown	20%	20%	20% - see paras 15 and 16 of our Issue 3 Statement.	20% buffer to account for persistent under-delivery
Whether the buffer should be applied to any previous under-delivery.	Council Assessment (as set out in Figure xi) of the Updated Housing Land supply Statement page 17, PS//02/43 applies the buffer to the previous under delivery. This point is debated in the statement however and the position is also outlined where the 5% is not added to the previous under delivery (Figure x)	Council's Assessment does not include a buffer to previous under supply. For comparative purposes, this assessment does not either	Council's Assessment does not include a buffer to previous under supply. For comparative purposes, this assessment does not either.	To 5 year housing requirement i.e. 4,250	To 5 year housing requirement i.e. 5,500	Dandara accepts either	Buffer should be applied to backlog, as established in a number of recent appeal decisions ³
What were the past completions?	1,951	1,951 2011 – 2015	1,951 2011 – 2015	1,951	1,951	1,951 ⁴	1,951 since 2011/12 based on the Council's August 2015 Updated Housing Land Supply Statement
What are the current commitments?	4,735	4,735 is total commitments, not commitments that are deliverable within the 5 year period from 2015 to 2020. The commitments (i.e. sites with a Planning Permission) deliverable within the 5 year period is as set out within the housing trajectory of the HLS Update Paper 3,483 dwellings .	4,735 is total commitments, not commitments that are deliverable within the 5 year period from 2015 to 2020. The commitments (i.e. sites with a Planning Permission) deliverable within the 5 year period is as set out within the housing trajectory of	4,535 (Based on Appendix 3 to our Statement to Issue 4)	4,535 (Based on Appendix 3 to our Statement to Issue 4)	Maximum delivery of 3,483 (3,214 larger site pp & 269 small site pp) 4,735 figure stated by council is not consistent with the 5,275 figure relied upon in BDBC at Fig X and Appendix 1 of their Updated Housing Land Supply Statement (Aug 2015) (PS/02/43). The 4,735 figure relies on unidentified windfalls, long-delayed allocations from the extant Local	4,668 based on the Council's August 2015 Updated Housing Land Supply Statement

³ Chard – Appeal Ref APP/R3325/A/13/2209680
Witchford – Appeal Ref APP/V0510/A/14/2224671
Langford – Appeal Ref APP/P0240/A/14/2228154
Spencers Wood – Appeal Ref APP/X0360/A/13/2209286

⁴ 2011/12 to 2014/15

		<p>A 10% Non-Implementation Rate applied to this supply would provide a more robust position of 3,135 dwellings in the period 2015 to 2020.</p>	<p>the HLS Update Paper 3,483 dwellings.</p> <p>A 10% Non-Implementation Rate applied to this supply would provide a more robust position of 3,135 dwellings in the period 2015 to 2020.</p>			<p>Plan, unallocated SHLAA sites and completions from emerging Local Plan allocations which have not been evidenced or shown to be deliverable.</p>	
<p>Assumptions over LP allocations and windfalls.</p>	<p>As set out in PS/02/43)</p>	<p>The Council advocate it has a total supply of 5,275 dwellings in the period 2015 to 2020, made up of the following:</p> <p>Commitments 3,483 Small Site Windfall 100 SHLAA Sites 310 Adopted Local Plan Allocations 222 Draft Allocations 1,160</p> <p>Total (inc Commitments) 5,275</p> <p>Re calculated using Non-implementation rate</p> <p>Commitments (10%) 3,135 Small Site Windfall (no deduction) 100 SHLAA Sites (20%) 248 Adopted Local Plan</p>	<p>The Council advocate it has a total supply of 5,275 dwellings in the period 2015 to 2020, made up of the following:</p> <p>Commitments 3,483 Small Site Windfall 100 SHLAA Sites 310 Adopted Local Plan Allocations 222 Draft Allocations 1,160</p> <p>Total (inc Commitments) 5,275</p> <p>Re calculated using Non-implementation rate</p> <p>Commitments (10%) 3,135 Small Site Windfall (no deduction) 100</p>			<p>BDBC assume 10 windfalls and 1,160 from draft LP allocations. We dispute the delivery of this figure.</p>	<p>This is a matter for further discussion at the Examination Hearings</p>

		Allocations (50%) 111 Draft Local Plan Allocations (15%) 986 Total (inc Commitments) 4,580 Years Supply with 5% buffer 3.9 years (4,580 ÷ 1,182) Years Supply with 20% buffer 3.5 years (4,580 ÷ 1,310)	SHLAA Sites (20%) 248 Adopted Local Plan Allocations (50%) 111 Draft Local Plan Allocations (15%) 986 Total (inc Commitments) 4,580 Years Supply with 5% buffer 3.4 years (4,580 ÷ 1,341) Years Supply with 20% buffer 3.1 years (4,580 ÷ 1,482)				
--	--	---	--	--	--	--	--