

# BDBC Local Plan Examination

## Response to MF8 Objectively Assessed Needs

### Middleton & Portway Estates

Following the publication of the Council's response to the Inspector's note on OAHN requested further clarification from the Council on several points relating to migration, commuting & affordable housing (MF7), we wish to offer the following comments:

Relevant paragraph	Comments
3	<p>The Council argues that the labour supply assumptions in the Edge Analytics report are conservative, and that a higher economic rate or a lower unemployment rate would result in fewer homes being required to support economic growth. However, we disagree with this approach on the basis that fewer homes being built with a higher level of economic growth would be likely to result in higher levels of out-commuting and reduced self-containment.</p>
8	<p>Whilst it is the Council's contention that 850 homes per annum would support the upper range of 700 jobs, we do not agree that this is an appropriate approach for the reasons set out above. Such an approach cannot be considered to be aligned with the Framework's objectives to meet 'objectively assessed needs' for economic growth, particularly in the context of Basingstoke Town's role in the context of the M3 corridor.</p>
9	<p>The PPG is clear that population projections should only be <i>the starting point</i> in deriving objectively assessed needs (emphasis added). Notwithstanding the range of models undertaken by the Council, the 850 dpa figure appears to be derived from the middle range of all of these scenarios. Indeed, the upper range of the population projections indicates a figure of 936 dpa. It is therefore unclear on what basis that the Council is able to conclude that it is appropriate to adjust the housing figure to 850dpa on the basis of unmet housing need, alongside other market factors.</p> <p>It is accepted that establishing housing need is not an exact science, and the Council has therefore sought to model a range of scenarios which factor in demographic growth, affordable housing need, as well as jobs growth. Although when taken together the modelling may well support a housing figure of 850 dpa, this does not provide any flexibility to respond to rapid change in accordance with the requirements of the NPPF. For example, the affordable housing register the potential to rise to August 2015 levels again (paragraph 21), thereby signalling an increased housing requirement overall.</p> <p>In this respect, more stringent eligibility criteria has recently resulted in a drastic reduction in size of the housing register (paragraph 23). The housing needs of those individuals no longer eligible may well therefore be 'hidden' e.g. either by having to rent in the private sector, staying at home. It is contended that a housing figure of 850 dpa will not meet the full housing needs of the District, and has the potential to</p>

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encourage suppression of household formation. To exclude such households from an assessment of housing needs is therefore subjective, and will not secure the delivery of sufficient housing to meet objectively assessed needs.

On the basis, it is considered that there is compelling evidence which indicates 936 dpa is an appropriate housing requirement, having regard to the various factors outlined above. For these reasons, we can only conclude that the Council's housing figure of 850 dpa is artificial, having regard to the various factors and variables which signal a need for an increased housing requirement (to at least 936 dpa) to ensure that housing growth will meet objectively assessed need. As such, we cannot consider a housing figure of 850 dpa to be justified.

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The trends in affordability do not take into account the continuing strong buyer demand which has the potential to compound the potential of new homes. It is also unclear whether it is reasonable to take into account the worsening disparities in house price ratios in the context of the housing market. We would question whether this is acceptable in the context of the urgent need for affordable housing, and in the interests of ensuring objectively assessed needs can be met.

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