

## Summary of points for exploratory meeting (11/12/14)

### Topic 2 - Housing Need (paragraphs 2.1 & 2.2) Flavia Estates and JJP Land

### Topic 3 – Other Housing Issues (paragraphs 2.3 -2.8) Flavia Estates and JJP Land

#### Paragraph 2.1

- South East Plan (paragraph 7.6) required that the housing requirement set for the Borough be an ‘absolute minimum’ yet this plan is for a figure below this ‘absolute minimum’. We are unaware of any LPA that has a full objectively assessed housing need (FOAHN) lower than the South East Plan requirement that has been found sound. The plan represents a backward step in housing provision. The plan has not been planned positively.

#### Paragraph 2.2

- The above position, as a benchmark, conflicts with paragraph 47 of the NPPF that requires LPA’s to ‘significantly boost the supply of housing’.

#### Paragraph 2.3

- The Council’s sole reliance upon CLG 2011 based headship rates up to 2021 and beyond is a projection from a recessionary period that is not robust having regard to present more positive economic conditions.
- Paragraph 4.21 of the Councils housing background paper refers to the sustainability appraisal and the outcomes of public consultation. These are not relevant factors in determining a FOAHN.
- The range of 550-1,084 dwellings identified in the SHMA to comprise the FOAHN cannot be described as a clear precise assessment.
- The scope of the SHMA by covering Basingstoke only is fundamentally flawed. The Borough has clear functional links with neighbouring councils as accepted in the 2007 SHMA. Circumstances have not altered to support that there are no longer any functional links. This is ignored in the Council’s evidence base and thus results in a housing requirement predicated upon unjustified evidence.
- The fact that no neighbouring authority considered to share a SHMA ignores reality and a lack of duty to co-operate on all sides.
- The acknowledgement of a market assessment “based on the local housing market of the borough”, is not a *Strategic* Housing Market Assessment.
- A 58.6% level of self-containment may be higher than other boroughs but even West Berkshire at 54.5% is now preparing a SHMA involving other councils.
- Other neighbouring councils (Hart, Wokingham, Bracknell, Surrey Heath, Waverley, Windsor and Maidenhead, as well as BDBC itself have had 5 year housing land supply deficits. The housing needs in this area of the South East have been frustrated. Constrained levels of housing supply will have placed downward pressure on household formation rates. Reliance on the 2011 household projections does not present a robust objective assessment of housing need and the Framework’s policy of seeking to meet housing needs in *full*.