

Basingstoke and Deane Local Plan
Issues for Discussion at the Exploratory Meeting of the 11th Dec 2014
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Summary comments on Issues 1.1, 2.1, 2.2, 2.4, 2.5, and 2.7

The LP looks to provide for 748dpa over the plan period.

The SHMA 2014 indicates that the borough has an OAHN of between 550 & 1080 dpa. Chapter 8 of the SHMA highlights the economic, social & environmental implications of the different scenarios.

The Edge Analytics - Demographic Analysis & Forecasts identifies an annual housing requirement of 550 (zero net migration) to 1084 dpa (migration led based on the last five years of historical evidence). The employment led scenario, which assumes a desire to provide for 600 jobs per annum suggests a housing requirement of between 936 & 1036dpa.

In the report to the Planning & Infrastructure Overview & Scrutiny Committee on the 30 January 2014 officers recommended that *'the committee provides comments to the Portfolio Holder for Planning on the proposed increase to the annual housing requirement from 748 dwellings per annum to 807 dwellings per annum'*¹

The SA (April 2014) does not test the scale of growth put forward in the SHMA or indeed that put forward in the report to the Planning & Infrastructure Overview & Scrutiny Committee in January 2014. Given the findings of these documents & the reps on the plan to date the SA should have looked at reasonable alternatives i.e. developing circa 800-900 or 900-1000dpa.

The fact that the SA has not looked at new reasonable alternatives in the light of the new evidence base is such that the plan cannot be said to be 'positively prepared' or 'justified'.

A figure of circa 750dpa cannot be said to be formulated in the context of meeting OAHN taking into account a range of factors including population growth, net migration & household size, when it does not even represent a mid-point in the latest SHMA figures (815dpa), let alone a mid-point in the Edge Analytics figures (926dpa). Put simply the figures in the SA look to reflect that agreed by Cabinet in taking forward the revised Pre-Submission Local Plan & are not justified in any way shape or form.

The council's response to the initial issues identified by the Inspectors & the content of TP01 do not demonstrate a robust SA or a positively prepared plan. Past delivery rates as set out in the AMR & TP01 demonstrate an ability to deliver much more than 748dpa.

P29 of the SHLAA indicates that there is capacity to accommodate 10,832 new dwellings on sites that are deemed suitable, available & achievable. This is significantly more housing than that required to meet the BC's requirement as set out in Table 2 of B&DLP.

In responding to issue 2.1 the BC have not addressed the matter of how the housing requirement squares with that advocated by Edge Analytics.

The housing requirement has not been justified, does not meet the OAHN of the district, does not boost significantly the supply of housing & could hamper rather than positively & proactively encourage sustainable economic growth – contrary to objective A of the plan.

All demographic led forecasts suggest a housing requirement of 748dpa (minimum) – see table 1 of TP01². However the BC answer to issue 2.4 infers the housing requirement is trend based and discounted rather than positively prepared.

In answer to issues 2.1 and 2.2 the housing projections should include a 20% buffer, not 5%. In recent appeals³ the BC have agreed *'a shortfall in the 5-year supply which should be regarded as both serious and significant'*.

The plan should be looking to deliver more – circa 900 – 1000 dpa.

¹ This report is referred to in para 4.36 of the TP01 and appendix Q of CD10 - can it be included in the evidence base so that what is said at para 4.36 can be read in context

² Net Nil has been ignored given para 159 of the NPPF

³ APP/H1705/A/13/2200861 - Land at Kennel Farm, Basingstoke – March 2014

APP/H1705/A/13/2205929 - Land At Razor's Farm, Chineham, Basingstoke – Sept 2014