

Examination of the Basingstoke and Deane Local Plan

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Councillor Mark Ruffell,
Portfolio Holder for Planning and Infrastructure
Basingstoke & Deane Borough Council

Dear Councillor Ruffell,

Basingstoke & Deane Local Plan Examination: Note of the Exploratory Meeting and possible next steps.

As promised, I am attaching a note of the Exploratory Meeting, which took place on 11 December 2014 in the Council's civic offices. My intention is to have it posted on the Council's Local Plan Examination website as soon as possible.

In my note of the meeting, I refer to a number of soundness issues which I had previously raised with the Council in my letter of 21 October 2014, in addition to concerns which emerged from participants in the afternoon session. Following the discussion between the Council and myself on these issues, it would appear from the Council's officer response towards the end of the meeting that most of my concerns can be tackled quite quickly and I was encouraged by Mr Dodgson's positive comment that "there is nothing we can't get to grips with".

Clearly, the biggest and most sensitive issue is the objectively assessed housing need (OAHN) for market and affordable housing in the Borough. As you know, *the Framework* refers to OAHN in paragraph 47, where it states that local planning authorities should meet this need, as far as is consistent with the policies set out in *the Framework*. You will recall that I referred to several key documents which have been submitted by the Council as part of the Examination into the Plan, including the Officer Report to the Council's Planning and Infrastructure Overview and Scrutiny Committee on 30 January 2014, the report from Edge Analytics dated December 2013, entitled *Demographic analysis & forecasts* and the Council's Strategic Housing Market Assessment (SHMA).

In addition to these documents, I also referred to a paper by Alan Holmans¹, which makes the case persuasively that a significant part (around half) of the lower, suppressed, rate of household formation in the 2011-based household projections is attributable to the state of the economy and the housing market, and that it would therefore be unwise to rely on these projections during the plan period when there is a very high chance that there will be a return to the higher rates of household formation which can be seen in the 2008-based household projections.

You will also recall that the Borough's OAHN was discussed in relation to three principal considerations – the headship rates of local households (which determine household numbers); the improving economic climate (including increased economic activity rates); and migration, including the need to have 'policy-off' estimates for international migration - all of which have an impact on household requirement for the Borough. I referred to Table 9 in the Edge Analytics report, which sets a figure of 853 dwellings per annum (dpa), based on what I consider to be robust assumptions made by the authors of that report. The Council's Officer Report considered that the Borough's OAHN of 748 dpa is no longer the most robust approach to settling the annual housing requirement, again basing its argument on the three principal considerations which I have briefly summarised above.

Whilst I have not come to any firm views at this stage in the Examination on what the OAHN for the Borough should be, as you know, I expressed my doubt as to whether the Council's figure of 748 dpa is a sound starting point for the Examination. I have therefore invited the Council to reconsider revising this figure in line with the figures in the Edge Analytics' Table 9, based on 'policy-off' international migration projections, realistic economic considerations and household formation rates based on option C (CLG 2008-based headship rates, scaled to be consistent with the 2011 Census but following the original trend thereafter).

The Council's officers have helpfully agreed to consider my comments in relation to revising the OAHN for the Borough to reflect the demographic considerations that were raised at the Exploratory Meeting and which I have summarised in this letter, and no doubt you will recall in discussion at the meeting that one possible way forward was to include the contingency sites. Another option that was also discussed at the meeting was to include a target for the Neighbourhood Plans (NPs) to achieve, although this would not require detailed site allocations which would be left for NPs, or indeed a ceiling on what the NPs could achieve.

For completeness, the issues which were discussed at the Exploratory Meeting and on which I asked for information/statements/ updates are:

- (i) A revised OAHN for the Borough, based on the considerations that are already set out in this letter.

¹ Alan Holmans: *New estimates of housing demand and need in England, 2011 to 2031: Town & Country Planning Tomorrow Series Paper 16*; September 2013.

- (ii) Sustainability Appraisal (SA) – Addendum to demonstrate clearly the sustainability implications for both option 3 and option 4, and the soundness implications of the east/west housing balance in the Local Plan.
- (iii) An assessment whether the provision of around 850 dpa would be acceptable environmentally in relation to potential pollution on the Rivers Loddon and Test.
- (iv) An assessment on whether any of the changes to accord with the Inspector’s concerns would require major new SA/HRA work, an SA/HRA addendum, or no new SA/HRA work at this stage.
- (v) An assessment as to whether the existing and proposed infrastructure would be able to satisfactorily accommodate the proposed growth to the south-west of Basingstoke.
- (vi) Inclusion of the model policy on sustainable development in the Local Plan.
- (vii) Inclusion of the housing trajectory in the Local Plan.
- (viii) Inclusion of an employment target or range in the Local Plan.
- (ix) Strengthen the Local Plan policy on gypsies and travellers in line with Government policy, possibly along one of the three options discussed at the Exploratory Meeting.
- (x) Detail for Strategic Sites, i.e. the major housing sites and Basing View – all that is needed at this stage is a commitment to provide insets and the appropriate level of detail, which can be discussed at an informal session at the Hearings.
- (xi) Affordable housing re-let information for the last 5 years.
- (xii) An update of the viability of policy SS10 for the development of a new station at Chineham, including the LEP’s commitment and likely phasing.
- (xiii) Information on relevant housing market signals, as required by the PPG.

At the Exploratory Meeting I gave the Council four options to consider for progressing the Local Plan. If the Council considers it can progress the Local Plan by addressing the points I have set out above, it needs to consider how much time it needs to carry out this work and when it can carry out any SA/HRA work and the required consultation. Although the Local Plan is not being placed in formal suspension, the need to avoid consultation in the period after the pre-General Election ‘cut-off’ date of 25 March 2015 means that some delay is likely before the Council would be ready for the Examination Hearings. Apart from the month of August, my diary would be able to accommodate most dates the Council may wish to programme the Hearings, and I would welcome a gap mid-way through of a week or two. Regarding the Pre Hearing Meeting, I would suggest that this is held around six weeks prior to the start of the Hearings.

Just to reiterate, once the Council has decided upon a realistic programme for the Examination from hereon in, I would make myself available to conduct the Hearings.

Finally, I would like to thank the Council for the work it has already carried out in order to address my initial concerns, and I would like to have confirmation as to its responses to the points set out in my letter.

Yours truly

Mike Fox

INSPECTOR