

Dear Sir/ Madam

BASINGSTOKE AND DEANE LOCAL PLAN 2024 to 2042

1. Thank you for consulting with the Home Builders Federation (HBF) on the Draft Spatial Strategy for the local plan.
2. HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which include multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

NPPF consultation

3. In December 2025 the Government published a consultation on the new NPPF. HBF recognise this will have no weight until it is formally adopted but once adopted the Council may need to give weight to some aspects of the policy. On the basis of paragraph 4 and 8 in Annex A of the draft NPPF being consulted on, this local plan, which the Council propose to submit under the current plan making process, will be examined under the NPPF24. However, it is also notable that in relation to decision making Annex A also states that from the date the new NPPF is published local plan policies that are "*...any way inconsistent with national decision making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework*". Therefore, should this new iteration of the NPPF be adopted unchanged the Council may need to have regard to national policies for decision making given that any inconsistency would effectively render policies in the local plan that are not consistent with the new Framework redundant as soon as the local plan is adopted.

Duty to co-operate

4. Following the publication of the Housing and Planning Minister Written Ministerial Statement on the 27th of November the Government have decided not to save the Duty to Co-operate. Therefore, once the relevant regulations have been enacted Basildon will no longer be under a duty to co-operate with its neighbours. However, this does not remove the policy requirement in the NPPF to maintain effective co-operation nor the need to consider, in addition to their own housing needs, "*... any needs that cannot be met within neighbouring areas ...*" as set out in paragraph 62 of the NPPF. The only difference arising from the removal of the duty is that a failure to co-operate effectively is a soundness matter that can be rectified through main modifications.

5. With regard to the potential for unmet housing needs the HBF are not aware of any neighbouring authorities that have an identified unmet need for housing. However, we do note that 57% of East Hampshire District Council is designated as part of the South Downs National Park, which could limit the amount of housing that could be delivered by the Council. The Council will therefore need to work closely with the likes of East Hampshire District and other authorities affected by the national park to ensure that any needs that cannot be met within those areas are addressed elsewhere.
6. The Council will therefore need to work closely with its neighbours to establish a strategy as to how these needs will be met and provide evidence in Statements of Common Ground to demonstrate joint working has been effective and positive. A failure to demonstrate effective co-operation will mean the strategy set out in the local plan has not been justified and is unsound.

SPS1: Scale and Distribution of Development

Housing needs

7. This policy establishes that the Council intends to meet its housing needs in full. Paragraph 3.2 of the local plan outlines that the Council have calculated housing needs using the standard method required by the NPPF published in 2023 for the first year of the plan - 828 dwellings per annum (dpa). For the following year the Council have used the assessment of need based on assessment as of March 2025 - 1,142 dpa - and then for the remaining plan period the outcome of the standard method based on the most up to date figures in May 2025 – 1,152 dpa. It is not clear from the consultation documents why the Council have chosen to take this approach. HBF would expect the assessment of housing need to commence in the year in which the assessment was undertaken on the basis that the most up to date data should be used and that any under supply, and logically any oversupply, prior to this, will be taken into account through step 2 of the standard method as set out in paragraph 68-031. This result in a housing need of 1,152 dpa using most to up to date information with the period over which needs are assessed commencing in 2025/26.
8. Turning to the end date of the plan period paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum of 15 years. On the basis that this local plan is to be submitted in December 2026 and in our experience the time taken between submission and adoption always exceeds 12 months, the earliest it is likely to be adopted is January 2028. As such, the plan will not look ahead for a full 15 years on adoption. In order to be consistent with national policy the period over which housing needs are provided for should be extended to 2042/43.
9. SPS1 should therefore be updated to state that the overall housing requirement for the plan will be 20,736 homes over the period 2025/26 to 2042/43. This amendment also changes the number of homes the Council is required to find in addition to existing commitments, allocations and windfall is 11,880 homes¹. No trajectory is provided

¹ Based on Figure 3.1 there are 6,700 commitments, 1,506 remaining allocations and 650 windfalls. This results in an existing supply of 8,856 between 2025/26 to and 2042/43. Subtracting this from 20,736 leaves the council need to find land to deliver an additional 11,880 homes

and no statement is made as to how many homes are expected to be delivered over the plan period. However, the summary of changes to the local plan in Figure 4.3 indicates that site allocations in this local plan will deliver an additional 13,491 homes with a further 1,030 homes delivered in rural settlements. If these sites are considered to be deliverable over the plan period, this will see supply reach 23,377 homes. This would provide a contingency of nearly 13% over the what is required. However, given that over half of the housing requirement is expected to come forward on sites of over 1,000 homes HBF considers it necessary for the contingency in this local plan to be closer to 20% as there is likely to be a greater risk of delay in relation to these sites.

10. As to whether the assumptions relating to the delivery of sites are reasonable, without a detailed housing trajectory or a is not possible to provide any comment on such matters. As the Council will be aware they are required by paragraph 78 of the to include housing trajectory in the local plan which illustrates the expected rate of housing delivery over the plan period. HBF would recommend that this does not just provides an overall trajectory but also includes the anticipated rate of delivery for each of the specific sites required to meet housing needs as well as the rate of windfall development. At present the only information in the HELAA on supply is the broad phasing within the plan period which is insufficient for the purposes considering the overarching deliverability of the local plan and the rate at which sites are expected to deliver new homes.
11. The detailed trajectory for each site does not necessarily need to be provided in the local plan itself but should form part of the evidence base. Detailed information on supply expectations is essential in order for those parties with an interest in the local plan, as well as the Inspector appointed to examine it, can effectively, and easily, scrutinise the assumptions that have been made and the soundness of those assumptions. In considering the timescales and delivery rates the Council must ensure that these are realistic. They need to reflect the complexity of sites, the strength of the market and the level of developer interest in that site. A site that already has developer interest providing a clear timeline for the delivery of that site, for example, should give the council more confidence as to the estimates of when that site will come forward. One key source the Council should not take into account with regard to delivery on larger sites is Lichfields Start to Finish. This research gives a good indication as to how long on average it takes to bring forward sites and can be used a sense check as to any estimates provided alongside other local information.

Stepped housing requirement

12. The Council are proposing in this consultation to use a stepped housing requirement. This would see the housing requirement set a 740 dpa in 2024/25, 1,142 in 2025/26 and 1,152 in 2026/27 before dropping to 900 homes between 2027/28 and the subsequently increasing to 1,287 dpa for the remainder of the plan. Firstly, there is no need for the first step. In line with our comments above the trajectory must start in 2025/26 with a housing need of 1,152 dpa.
13. Secondly, while HBF recognises that PPG allows for stepped trajectories, a key starting point for any spatial strategy should be to ensure that the plan delivers homes consistently across the plan period and does not seek to unnecessarily delay the delivery of new homes on the basis of the sites that are selected to meet housing needs.

The strength of the market and pent up demand for new homes in Basingstoke and Deane would suggest that with the right mix of small, medium and large sites available the Council would be able to deliver homes consistently across the plan period. Therefore, the Council must do all it can to avoid pushing back the delivery of new homes to later in the plan period on the basis of its spatial strategy. If the Council choice of strategy reveals it cannot meet needs and does not have a five year land supply on adoption it should seek to allocate additional sites not to amend the trajectory. A stepped trajectory should only be entertained once all other reasonable options to ensure a consistent supply of homes across the plan period have been considered to show that the Council is not, as required by paragraph 68-12 of PPG, unnecessarily delaying meeting identified development needs.

10% of delivery on sites of less than one hectare

14. Without a detailed trajectory it is also not possible to comment on whether, as required by paragraph 73 of the NPPF, the Council deliver at least 10% of its housing requirement (around 2,000 homes) on sites of less than one hectare identified in the local plan. In meeting the requirement in paragraph 73 of the NPPF the Council must ensure it is achieved from identified sites – either as an allocation in the local plan or as a site in the Council’s Brownfield Register. The Council must not rely on assumed levels of windfall delivery on small sites to meet this requirement. Such an approach would be inconsistent with the NPPF which defines windfall sites in its Glossary as “*Sites not specifically identified in the development plan*”. It is important to recognise that the allocation of small sites is a priority and stems from the need to support small house builders by ensuring that they benefit from having their sites identified for development either through the local plan or brownfield register. The effect of an allocation is to take some of the risk out of that development and provide greater certainty that those sites come forward. This in turn will allow the SME sector to grow, deliver homes that will increase the diversity of the new homes that are available as well as bring those homes forward earlier in the plan period.
15. The Council should also recognise that allocating small sites and supporting SME house builders not only ensures a stronger supply in the short term but also improves the diversity of choice within local housing markets, support local and regional supply chains and are often pivotal in bring forward innovation and supporting jobs growth locally, with 1 in 5 of the SME work force comprising of apprentices. A failure to allocate small sites will contribute to the continued decline in small and medium sized house builders. Recent re-search by the HBF has found that there are 85% fewer small house builders today than there were 20 years ago and that of a survey of SME house builders 93% said that planning was a major barrier to SME growth. Whilst this decline is due to a range of factors, more allocations of small sites would ease the burden on many SME developers and provide more certainty that their scheme will be permitted, allowing them to secure the necessary finance that is often unavailable to SMEs until permission is granted.

Distribution of development

16. While the HBF does not comment on specific distributions or site the Council will need to have regard to the Secretary of State for Housing, Communities and Local Government’s speech to parliament on the 18th of No-

vember 2025 and Written Ministerial Statement both of which clearly set out the government's vision to accelerate house building, and in particular seeking to significantly increase development around rail stations. These statements are also reflected the draft NPPF which places significant emphasis on securing development with reasonable distance of railway stations which provide a high level of connectivity to jobs and services. These statements and the draft NPPF are material considerations and will need to be taken into account when preparing the next iteration of the local plan and look to allocate sites that are well related to stations and which would be considered priorities for development on the basis of what is being proposed by the Government.

SPS6 – Neighbourhood Planning

17. HBF considers it important that targets are provided for smaller, more rural settlements. However, if there are sites in these settlements that are suitable sites being promoted through this local plan the Council should allocate these now and not wait for them to be allocated through a neighbouring plan as there is no certainty when or if these will come forward. Such an approach is also more likely to assist the Council to meeting the requirements set out in paragraph 73a of the NPPF.
18. Finally, in setting these targets the policy must specify that these are minimums to avoid decision makers refusing development beyond what is established through this policy.

ENV2 – Strategic gaps

19. While the HBF recognise that strategic gaps are currently part of the adopted local plan, there is no mention of strategic gaps between settlements within national policy outside of purposes B of Green Belt policy relating to the merger of towns, no mention of the need to prevent the coalescence of settlements. It should also be noted that even with regard to purpose B this is restricted to the merger of towns with the latest version of PPG stating it does not apply to villages. As such HBF is not supportive of this policy or its expansion to new locations and considers that development can be managed effectively through other development management policies related to the countryside and the edge of settlements with impacting on the long term deliverability of development at these locations should it be necessary. Not only will the policy restrict the Council should it need to find further sites during this plan period, but it will also make it more difficult for future local plans to meet needs by creating what will be considered locally as unalterable designations.

Future Engagement

20. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider housebuilding industry.
21. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

Mark Behrendt

Regional Planning Manager – SE and E

Email: mark.behrendt@hbf.co.uk

Phone: 07867415547