

EiP
THE BASINGSTOKE & DEANE LOCAL PLAN

HEARING STATEMENT
ANTONY MERRIMAN

Hearing Session(s): Issue 4 – Other Housing Matters

Hearing Date: 13 October 2015

Contents

1 . Notes and Key To assist reading/interpretation of this statement.

2 . Inspectors Issues and Questions addressed Highlighting which Issues/Questions have been addressed.

2.1 “Overall distribution”

2.2 “Duty to co-operate”

2.3 “Consideration of options and audit trail”

2.4 “Spatial strategy adherence to NPPF and relationships with neighbouring areas”

3 . Summary of failures High level summary of failures with the plan, laid out in accordance with item 34 of the guidance notes.

4. Detailed examination of points of failure Detail of issues with the plan. These are expressed as succinctly as possible.

4.1 Distribution Options

4.2 Strategic spatial options

4.3 Location Options - Consultation results

4.4 Evidence of co-operation – strategic options

4.5 Coalescence – lack of genuine appraisal of pros and cons

1. Notes and Key

Important note

Please note that the points I wish to raise cover certain elements of Issues 1,2,3 as well as Issue 4. I note the inspectors request to make separate statements for each issue, however I have only been asked to appear at the hearing for Issue 4 (I had asked to appear on Issue 3). As such, any statements made for issues 1,2 &3 would not be supporting a physical presence at the hearing (unclear whether that is allowed) and also duplicate points made (which would contradict the inspectors request for brevity).

Key (to assist in reading document)

References to other documents in green
Links to other documents in blue
<i>Extracts from other documents in Italics</i>
Points I wish to highlight in extracts from other documents in yellow

2. Inspectors questions addressed my highlighting

2.1 Overall distribution

Extract from Pg 4 'Inspectors Key Issues and discussion note' (issue 4)

<http://www.basingstoke.gov.uk/content/doclib/980.pdf>

"5. Distribution of housing development:

5.1 Is the Plan's **distribution of overall housing development**, including indicative levels of housing growth in the Borough, as set out in policy SS3, the Council's Document PS/02/14 and the 2014 Strategic Housing Land Availability Assessment (SHLAA) (HO4), **justified** and at the right level of detail for the Plan?"

2.2 Duty to co-operate

Extract from Pg 1&2 'Inspectors Key Issues and discussion note' (issue 1)

<http://www.basingstoke.gov.uk/content/doclib/980.pdf>

"2. **Duty to Co-operate (DTC):** ...

2.1 Has the Council **worked collaboratively** with other authorities and organisations during plan preparation on **strategic planning matters that cross administrative boundaries?**

...

2.4 What particular **outcomes** can the Council point to in relation to DTC?"

2.3 Consideration of options and audit trail

Extract from Pg 2 'Inspectors Key Issues and discussion note' (issue 2)

<http://www.basingstoke.gov.uk/content/doclib/980.pdf>

"3. **Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA):**

3.1 Is the **spatial strategy** **supported by the SA** and the HRA?

3.2 Have **reasonable alternatives** been considered in the SA? Is there a **clear audit trail** from the **consideration of option to the preferred strategy** in the Plan?"

2.4 Spatial strategy adherence to NPPF and relationships with neighbouring areas

Extract from Pg 2 'Inspectors Key Issues and discussion note' (issue 3)

<http://www.basingstoke.gov.uk/content/doclib/980.pdf>

4. Spatial Strategy and housing need:

"4.1 Are the overall vision, objectives and **spatial strategy** of the Plan, as set out in policy SS1 and the supporting text, based on a sound assessment of Basingstoke and Deane's demographic and socio-economic needs, environmental characteristics, existing and proposed infrastructure and **relationships with neighbouring areas**, in **accordance with national planning policy?**"

3. Summary of failures (as per point 34 on guidance notes)

What particular part of the document is unsound?	Which soundness test(s) does it fail?	Why does it fail?	How could the document be made sound?	What is the precise change that is sought?
Policy SS3 – Greenfield Allocation	Not positively prepared	Inadequate justification for the chosen strategy	The Plan should be amended to show how and why the preferred strategy has been chosen	A clear description of the process by which the agreed strategy has been agreed upon.
Policy SS3 – Greenfield Allocation	Not positively prepared	Lack of genuine consideration of strategic options for Greenfield development	The plan should go forward but be amended to cover a shorter period of time (e.g. to 2021) with the least sustainable greenfield sites being removed. A proper evaluation of all strategic options should then be carried out in 2016, and a new plan prepared to cover 2021 to 2029.	Amendment of period of plan. Removal of specific greenfield sites.

4. Detailed explanation of points of failure

There are 5 main failure points in which the plan is not 'positively prepared'. The common theme running through these is one of logical inconsistency and failure to thoroughly explore all options, in particular a tendency to address strategic options and choices superficially, if at all, instead moving to tactical solutions without justification for having done so or link back to strategy.

An (imperfect) analogy would be if, in 1943, the Allies strategic planning process had been as follows:

"Options for invasion of Europe:

Option 1 Pas de Calais

Option 2 Normandy

Option 3 Italy

We've found some beaches near Calais. Let's have a look at these in detail..."

The impression one gains is that all the thousands of pages and hundreds of documents have ended up with the premeditated approach desired at the outset, i.e. (nearly) all development on the outskirts of Basingstoke, (overwhelmingly to the west and southwest), with none in rural areas, very little in other settlements and no coalescence with neighbouring villages. This is also, in my view, the most politically expedient approach, which is unsurprising but not an appropriate basis for strategic planning.

4.1 Distribution Options

A key factor in the Local plan preparation has been selection of preferred options for both the “location” and “approach” to Greenfield development. There is a lack of a clear audit trail in refinement of these options, and inconsistency in definitions over time. In order to assist the inspector I have prepared the following summary diagram, showing how the options were, respectively:

Originally presented in the Sustainability Appraisal ('Presented')

Consulted on in the 'New Homes Consultation' ('Consulted')

Evaluated as part of formulation of in the submitted plan ('Preferred')

Selected in the submitted plan ('In plan')

Options originally **presented**

Sustainability Appraisal and Strategic Environmental Assessment Report Draft for public consultation - April 2014 Pg 45

<http://www.basingstoke.gov.uk/content/doclib/495.pdf>

<table border="1"> <tr> <td>Issue 4</td> </tr> <tr> <td>Option 1. Locate all major Greenfield development on the edge of Basingstoke</td> </tr> <tr> <td>Option 2. Alternatively, or in addition, seek to locate Greenfield development at Basingstoke and also some other main settlements in the Western Corridor and Blackwater Valley sub-region, such as Bramley or Tadley</td> </tr> <tr> <td>Option 3. In addition, seek to locate some limited Greenfield development around other settlements, including those outside the Western Corridor and Blackwater Valley sub-region, such as Overton and Whitchurch</td> </tr> </table>	Issue 4	Option 1. Locate all major Greenfield development on the edge of Basingstoke	Option 2. Alternatively, or in addition, seek to locate Greenfield development at Basingstoke and also some other main settlements in the Western Corridor and Blackwater Valley sub-region, such as Bramley or Tadley	Option 3. In addition, seek to locate some limited Greenfield development around other settlements, including those outside the Western Corridor and Blackwater Valley sub-region, such as Overton and Whitchurch	<table border="1"> <tr> <td>Issue5</td> </tr> <tr> <td>Option 1. Seek to locate all development in one major development area at Basingstoke</td> </tr> <tr> <td>Option 2. Seek to locate major Greenfield development in more than one development area</td> </tr> <tr> <td>Option 3. Seek to develop a larger number of smaller Greenfield locations</td> </tr> </table>	Issue5	Option 1. Seek to locate all development in one major development area at Basingstoke	Option 2. Seek to locate major Greenfield development in more than one development area	Option 3. Seek to develop a larger number of smaller Greenfield locations
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Options **consulted**

Housing Figures Survey for Basingstoke and Deane Borough Council 17 January 2011 Aka 'New Homes Consultation'

<http://www.basingstoke.gov.uk/content/doclib/479.pdf>

One large development on the outskirts of Basingstoke, including local facilities 18%
Small or medium sized development sites on the outskirts of Basingstoke town 35%
Smaller developments across the whole of Basingstoke and Deane creating extensions to towns and villages 38%



Options **preferred**

Sustainability Appraisal and Strategic Environmental Assessment Appendices 1 to 13

Draft for public consultation - April 2014 Appendix 12, pgs 3&4

<http://www.basingstoke.gov.uk/content/doclib/479.pdf>

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Options **in plan**

Sustainability Appraisal and Strategic Environmental Assessment

Appendices 1 to 13

Draft for public consultation - April 2014 Appendix 13

<http://www.basingstoke.gov.uk/content/doclib/496.pdf>

Option 1 – Basingstoke focus for all development
Option 2 – Basingstoke focus and a spread of development to larger settlements in the borough (Assessed as favourable option)
Option 3 – A spread of development to a greater number of settlements in the borough, where they have SPBs

These options are highly material in the process of formulation of the BDBC local plan, as they have been used as justification for the greenfield site selection process (for more detail see 4.2 and 4.3 below).

As such, any logical inconsistencies in these options represent a serious flaw in the preparation of the plan.

There are 3 main points of failure of the options, as follows:

1 Inconsistency between various options across time, with subtle shifts of wording between options and widespread interchangeable quotations through the evidence base.

2 Lack of consistency between 2 separate lists of options (Issues 4 & 5) and one combined list of options.

3 Lack of any quantification in the options, rendering them too ambiguous to be of value in a decision making process.

Taken together, these render these series of options of little or no value in demonstrating a clear audit trail from consideration of options to the solution recommended.

In point of fact, by most definitions of materiality, the plan is actually proposing something that is closer in nature to options that have ostensibly been rejected, namely (nearly) ALL development around Basingstoke and focussed in 1 or 2 major development areas.

4.2 Strategic spatial options

At the outset of the process of formulating the local plan 8 broad options for location of greenfield development were presented, as follows:

1. Develop south of the M3 motorway
2. Westward extension of Basingstoke
3. Eastward extension of Basingstoke
4. Northward extension of Basingstoke
5. North-east extension of Basingstoke
6. A range of smaller sites around Basingstoke
7. Further growth around other settlements within the Western Corridor and Blackwater valley sub-region such as Tadley and Bramley
8. Further growth around settlements outside the Western Corridor and Blackwater Valley sub-region such as Overton and Whitchurch

No comparative analysis of the strengths/weaknesses of these strategic options was carried out; instead, the results of the consultation (see 4.1 above) were used as a justification for a tactical approach of selecting areas from each option (except Option 1, see below)

<http://www.basingstoke.gov.uk/content/doclib/496.pdf>

Pg 5 Appendix 12 (page 385)

“The approach taken by the Core Strategy reflects a number of these options, including parts of option 1, 3, 4, 5, 6, 7 and 8. This reflects:*

- *The findings of the New Homes consultation, which identified the need to disperse development to the main settlements;*
- *The revocation of the South East Plan, and consequentially deleting the need for references to the Western Corridor and Blackwater Valley; and*
- *The findings of the evidence base, including the SHLAA, which highlights greenfield sites with the scope to accommodate housing in the future. It also reflects issues around Tadley and the nearby AWE site at Aldermaston, which limits growth locally.*

*Of the options taken forward, it should be noted that some of these highlight large areas of land, of which only a small part of each would be taken forward. This reflects the outcomes of the site assessment work, undertaken for the Category One SHLAA sites”. *Typo, should be option 2?*

This is a fundamental failure in the entire approach and a lost opportunity to properly consider the strategic direction of the development of Basingstoke. In particular, there is no clear audit trail from the consideration of options to the preferred strategy (as highlighted by the inspector in his ‘Key Issues and discussion note’, 4.2)

Furthermore, the rejection of option 1 as a strategy is unjustified. The explanation given:

<http://www.basingstoke.gov.uk/content/doclib/496.pdf>

Pg 5 Appendix 12 (page 385)

“Option 1 has not been taken forward because the landowner is not actively promoting the site for development and will not review this position until the Core Strategy is adopted.”

This is not backed up by any evidence and is, in any case, illogical, as there are many different landowners in the area shown as ‘Option 1’ on the accompanying map. This one brief statement seems to have discounted any development to the south of the town, some parts of which are far more sustainable (being far closer to transport links and the town centre) than other greenfield sites that are being proposed. The M3 should not be a barrier to development; there is plenty of precedence for LAs developing on the ‘other side’ of a Motorway (Welborne in Fareham is one current example).

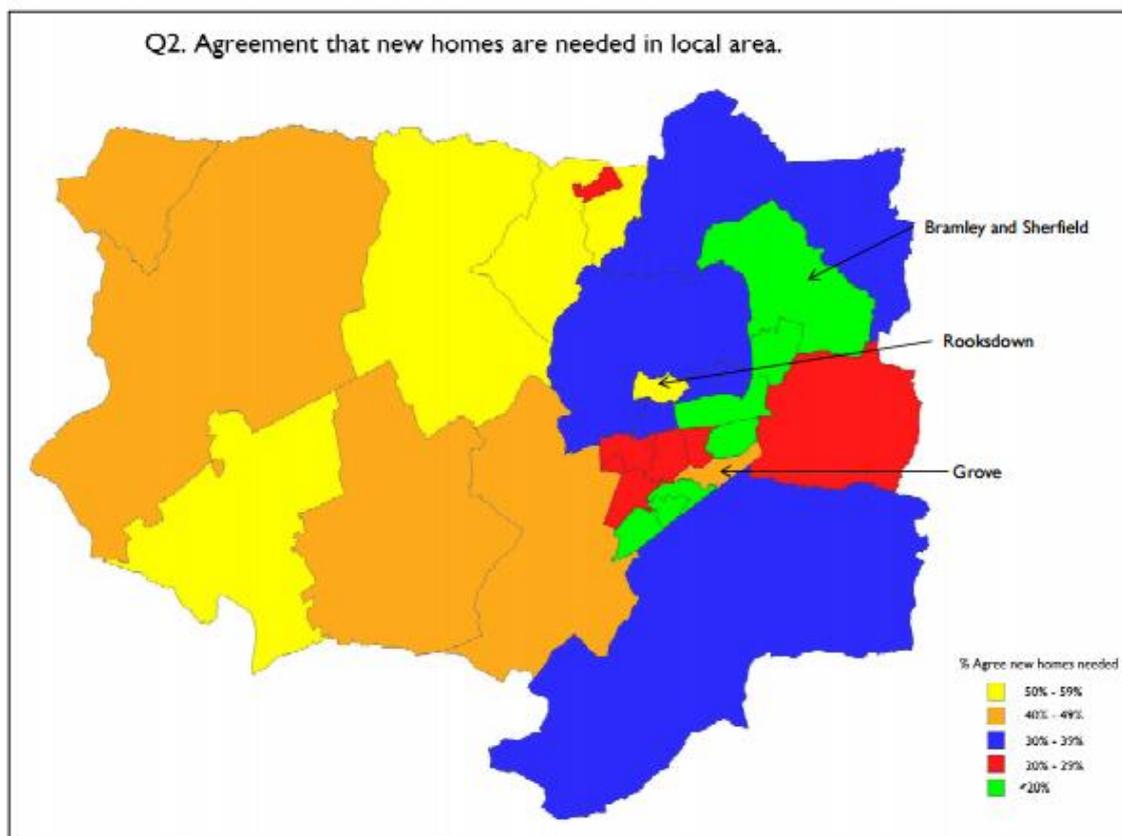
4.3 Location Options - Consultation results

One particular element of the results of the New Homes consultation has been quoted on many occasions in the documentation accompanying the formulation of the plan; that is to say the majority against a single large development. As noted above in 4.1 this is cited as justification for the approach for distributed greenfield development and is thus highly significant in the strategy chosen. This is very selective use of the results, however, as the other main finding of the consultation; the geographical variance across the borough of where people wanted new homes; has been completely ignored.

<http://www.basingstoke.gov.uk/content/doclib/479.pdf>

Housing Figures Survey 2010 Pg 14

Figure 3. Whether New Homes are Needed in 'Local Area' (Ward Map)



The key used is unusual (in that red and green are at the same end of the scale) but the results are clear; the NE and SW edges of Basingstoke are where there is least residents' agreement on the need for new homes. This finding has been completely ignored in formulation of the plan; crucially there is no evidence that it has even been taken into account nor any objective assessment of the desire of local residents vs other criteria in deciding where to locate development. This is another fundamental flaw in the process, and is contrary to NPPF guidelines. It is also a waste of residents' money; if no account is to be taken of the results of these exercise then why was it carried out? Finally it is inconsistent, in that other results (see 3.1 above) from this consultation are quoted extensively in the process.

Basingstoke Town currently makes up 60% of the population of the borough, yet is being proposed for 96.5% of greenfield development. This massive imbalance is justified in the plan on the basis of 'need'; the housing need in Basingstoke Town would have to be 18 times greater (per head of population) than that in the rest of the borough to justify such a ratio of development. In actual fact the housing need of the rest of the borough would seem (as evidenced in this consultation) to be greater than that of Basingstoke Town.

4.4 Evidence of co-operation – strategic options

The NPPF requires Local Authorities to co-operate with neighbouring authorities in preparation of the Local plan. There is little documented evidence of any meaningful discussion by BDBC on strategic options with neighbouring authorities.

There are two areas in particular where co-operation, combined with a joint assessment of strategic options, would have contributed significantly in preparation on the Local plan.

4.4.1 Micheldever New Town (Winchester)

This land has been actively promoted by the landowner and is a great opportunity for a sustainable development. The landowner has made the point to BDBC that it is a more sustainable location than, for example, the development currently being proposed to the South West of Basingstoke.

The extent of possible development at Micheldever requires a thorough examination of the pros and cons of strategic options for greenfield development at a regional level (across LA boundaries); this is, I believe, the spirit of what is intended by 'Duty to co-operate' in the NPPF. No such strategic review has taken place. This is a major omission in the BDBC planning process, in that had such a review taken place, and (if) it had concluded that Micheldever was a suitable site, much of the other greenfield development in both Winchester and BDBC's plans would be unnecessary.

4.4.2 South of Newbury

BDBC have noted development South of Newbury as 'of relevance':

<http://www.basingstoke.gov.uk/content/doclib/495.pdf>

Housing Figures Survey 2010 Pg 14

"Neighbouring authorities

2.10 Many of our neighbouring authorities are in the process of preparing their Local Plans or have an adopted Core Strategy. Of relevance to Basingstoke and Deane, West Berkshire Council has allocated a site for development of up to 2000 dwellings with new retail facilities and school provision at Sandleford Park to the south of Newbury, and close to the north-west boundary of Basingstoke and Deane. West Berkshire Council is currently working on their Site Allocations and Delivery Development Plan Document (DPD) (from SA Pg 14)"

However no assessment has then taken place of the resulting opportunity to develop adjacent land within the BDBC area. Areas of land exist within BDBC (outside the AONB) close to Newbury which are more sustainable than some of the developments being proposed in the BDBC Local Plan. There is plenty of precedent for LAs developing land within their area but more closely aligned to a neighbouring LA's main urban area (Wokingham/Reading, Eastleigh/Fareham, East Hants/Clanfield for example). This option has not even been considered as an option in the BDBC Local Plan formulation process. This is a major omission.

4.5 Coalescence – lack of genuine appraisal of pros and cons

It is clear from the sites selected and the creation of various strategic gaps that coalescence with any of the villages surrounding Basingstoke has been treated as an absolute 'red line'. This approach, however, has resulted in a severe reduction of options available in the planning process. The avoidance of coalescence with Old Basing in particular, and to a lesser extent Cliddesden, Sherborne St John and Oakley, is one of the main causes of the very unusual shape of development of the town, which in turn creates significant sustainability issues. Coalescence is clearly politically challenging; however the lack of any attempt to properly evaluate the pros and cons of coalescence is a major omission and failure of strategy in the planning process.