

**EXAMINATION IN PUBLIC OF  
THE BASINGSTOKE & DEANE LOCAL PLAN**

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**HEARING STATEMENT  
ON BEHALF OF  
THE BASINGSTOKE  
SOUTH-WEST ACTION GROUP (SWAG)**

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

**Hearing Dates: 13 October 2015**

**Addressing: Inspector’s Questions**

**5. Distribution of housing development**

Stafford Napier will represent the Basingstoke South West Action Group (SWAG) at the Examination.

**1. Summary of Tests of Soundness**

<b>Question</b>	<b>Test of Soundness</b>	<b>Suggested Modification</b>
3.1	Not <b>positively prepared</b> Not <b>justified</b>	The proposed distribution should be amended to conform with the conclusions of the SA (App 13a)
3.2	Not <b>positively prepared</b> Not <b>justified</b>	The Plan should be amended to show how and why the preferred strategy has been chosen

**2. Question : Is the proposed distribution consistent with the Sustainability Appraisal?**

SWAG holds the view that the selection of Greenfield Developments set out in the Plan at Policy SS3 is inconsistent with the conclusions reached in the Sustainability Appraisal (SA).

**2.1 Sustainability Appraisal**

2.1.1 Appendices 10, 12, 13 and 13a of the SA examine and evaluate different options for the spatial strategy on which the selection of Greenfield Development should be based.

2.1.2 Appendix 10 Issue 5<sup>1</sup> sets out the Initial Appraisal of Core Strategy Approaches for Greenfield Development. The conclusion of this Appraisal was to prefer Options 2 and 3 (locating

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<sup>1</sup> Appendix 10 p.19 (428) – Examination Library PS/02/16

Greenfield Development in more than one area or developing a larger number of Greenfield locations).

2.1.3 This conclusion is stated to also conform most closely with the outcome of the New Homes Consultation 2011<sup>2</sup> which concluded that there was a majority view that one large development on the outskirts of Basingstoke Town was the least favoured option.

2.1.4 Appendix 12 sets out the refinement of the options for development. With respect to Issue 4 (Location of Greenfield Development) and Issue 5 (Approach to Greenfield Development), the conclusion is that Option 1 (locating development in one major area) would not be taken forward and that Option 3 (developing a larger number of Greenfield locations) was the preferred option. Reasons are given in the Appendix<sup>3</sup>.

2.1.5 Appendix 13a dated May 2015 is a sustainability appraisal of three options of spatial distribution and addresses specifically the Question raised by the Inspector in his letter to the Council dated 19<sup>th</sup> December 2014 in which he asked for an examination of "*the soundness implications of the east/west housing balance in the Local Plan.*" Appendix 13a examines three options (1 - distribution of sites, 2 - an east focus and a 3 - west/southwest focus) as shown in the map below.



The conclusion of this sustainability appraisal is that the **preferred** option for housing is a spread of development and that both the east and west/southwest foci should be **rejected**. This is expressed as follows.

*"The preferred housing growth option for Basingstoke Town is option 1 (Spread of development). This is because the approach, when compared to the other options, will distribute housing around*

<sup>2</sup> Examination Library PV05

<sup>3</sup> Appendix 12 pp.3 and 4 (552) – Examination Library PS/02/16

the town offering more choice and development may be more integrated with the town than with the other options. Local consultation has favoured this approach. Option 1 is expected to provide a quantum of development that will most help to achieve the 850 dpa preferred option. Option 1 will allow a better opportunity for development to be located on the least constrained and most sustainable sites. Option 2 may have a more negative environmental impact (biodiversity, flooding and landscape). Option 3 may also have more negative environmental impacts (landscape). Options 2 and 3 may result in some new housing being isolated and less integrated with the rest of Basingstoke and also have deliverability issues. Options 2 and 3 may not provide the quantum of development that will help to achieve the 850 dpa preferred due to housing capacity of the available sites within the option area (i.e west/ south-west, east).

**Option 1 should be taken forward as the preferred option** and these SA findings, along with the council's other evidence, should influence the decision on the preferred sites to be allocated in and around Basingstoke Town in the Local Plan.<sup>4</sup>

2.1.6 It is instructive to examine the reasons for this conclusion as set out in Appendix 13a<sup>5</sup>. Most of the conclusions on the rejected options of an east or west/southwest focus are similar. However there are specific comparative conclusions in respect of these foci which provide a balance for an assessment of relative positive and negative effects.

Focus	Comparative Negative Impact	Comparative Positive Impact
East	1. Biodiversity and flooding issues of Loddon Corridor though mitigation may be possible  2. Potential for sites to be isolated and less integrated ( <b>however it is SWAG's view that sites in the East would be less isolated and more integrated, being closer to the town centre and the major areas of employment</b> )	Would aid the case for Chineham rail station improving access to sustainable transport option.
West/southwest	1. Landscape impact due to character & relationship with surrounding countryside.  2. Potential for sites to be isolated and less integrated	No comparative positive benefits

2.1.7 The potential for SHLAA sites in the east to be isolated and less integrated than those in the south west is challenged by SWAG. The NPPF recommends that development should be targeted

<sup>4</sup> Sustainability Appraisal April 2015 Appendix 13a pp14, 15 and 16 (615), Examination Library PS/02/16

<sup>5</sup> Appendix 13a pp.14, 15 and 16 (605), Examination Library PS/02/16

where journey lengths for employment and shopping can be minimised<sup>6</sup>. This would favour the development sites in the east as opposed to those in the south west.

2.1.8 The SA is therefore clear in its conclusion that the Spatial Strategy for the Plan should be neither an eastern nor a west/southwestern focus, but should be based on a distributed strategy.

2.1.9 This conclusion is reinforced in Appendix 15 of the SA which examined 4 options of combinations of sites and again selected a distribution of sites as the most appropriate, specifically discounting Option 3 which was *“a focus to the south-west of Basingstoke with, effectively, a major development area comprising sites BAS098, BAS114, BAS132 and BAS133 (as well as BAS104, BAS107, BAS024)”*<sup>7</sup>. However this is the very selection of sites that has now found its way into the Plan.

## **2.2 Submission Local Plan**

2.2.1 It is our view that the Plan as submitted and modified therefore does **not** conform to the conclusions of the SA. Policy SS 3 identifies Greenfield Site Allocations for 7,690 dwellings over the period of the Plan. Of these, **7,420** are allocated to sites on the periphery of the Basingstoke SPB. Table 1 shows that **74%** of these Greenfield Allocations are in the west and south west. SWAG contends that this can only be viewed as a “west/southwest focus” which is inconsistent with the conclusions of the Sustainability Appraisal.

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<sup>6</sup> NPPF Paras 30 and 37

<sup>7</sup> Sustainability Appraisal April 2015 Appendix 15 p13 (1761), Examination Library PS/02/16

COMPARATIVE HOUSING FOCUS - BASINGSTOKE				
GREENFIELD SITE ALLOCATIONS (POLICY SS3)				
Area	Site Identity	Projected Housing Yield	Total for Area	% of Total
West/South West	Manydown	3,400		
	Kennel Farm	310		
	Golf Course	1,000		
	Hounsome Fields	750		
			5,460	74%
East	Swing Swang Lane	100		
	Razors Farm	420		
	Redlands	150		
	Upper Cufaude	390		
	East of Basingstoke	450		
			1,510	20%
North	North of Popley	450		
			450	6%
<b>TOTAL</b>			<b>7,420</b>	

TABLE 1

2.2.2 The Plan, as submitted, therefore fails to fulfil the requirements of NPPF para 182 in that it has not been prepared “in accordance with ...legal and procedural requirements” and is not the most appropriate strategy based on proportionate evidence. The Sustainability Appraisal is not fit for purpose in respect of the selection of a spatial strategy.

**2.3 Suggested Modification**

2.3.1 The spatial strategy should be amended to conform to the conclusions of the SA (Appendix 13a) by removing the Greenfield Site Allocations SS3.11 and SS3.12 (Basingstoke Golf Course and Hounsome Fields) from Policy SS3 and replacing them with an increased allocation on SS3.9 (East of Basingstoke) and an appropriate allocation to a combination of the rejected SHLAA sites BAS102 and BAS103 (Lodge Farm and Poors Farm) together with an allocation to the Omission Site OLD005 Hodds Farm. This would provide a more balanced and dispersed spatial strategy of **50%** in the west and south west and **44%** in the east and north, which would conform more closely to the recommendations and conclusions of the SA.