

**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 5 - "Greenfield Site Allocations"**

**Hearing Dates: 21 October 2015**

**Addressing: Proposed Allocations at Basingstoke Golf Course (SS3.11) and Hounsome Fields (SS3.12)**

**Introduction**

1. The Basingstoke South-West Action Group ("SWAG") is a residents' group, with over 700 registered supporters, formed to draw together the views of those living to the south-west of the Basingstoke, principally in Kempshott, Hatch Warren, Beggarwood and Dummer. SWAG has a particular interest in the Examination, in resisting the allocation of Basingstoke Golf Course and Hounscome Fields as housing sites.
2. SWAG is of the view that the allocation of those two sites renders the Plan unsound. The Plan could be made sound by allocating less harmful assessed alternatives (addressed in other hearing statements prepared by SWAG to address Issue 2 and Issue 6).
3. Whilst the Inspector has sought submissions, within Issue 5 paragraph 11 of his note of 17 July 2015, as to whether the allocations are "positively prepared, justified and deliverable", the Inspector will of course know that by s.20(5) Planning and Compulsory Purchase Act 2004 he is to determine whether the allocations are

“sound”. The Government has supplied its definition of soundness at paragraph 182 NPPF which extends to whether the allocation is:

- Positively prepared
  - Justified
  - Effective
  - Consistent with national policy
4. Accordingly, these submissions shall address each of these factors, where relevant, so as to assist the Examination of the Plan as fully as possible.
5. SWAG is of the firm view that greenfield allocations set out within policies SS3.11 (Basingstoke Golf Course) and SS3.12 (Hounsme Fields) are unsound for the following reasons:
- Both allocations would have a severe adverse impact on the intrinsic beauty and character of the countryside.
  - Both allocations would undermine an important land-use function being performed by land to the south-west of the urban area, being the containment of urban sprawl of the urban area of Basingstoke.
  - Both allocations would see the loss of significant amounts of the best and most versatile agricultural land.
  - Both allocations would result in unsustainable and isolated settlements dependent on private car-based transport.
  - Both allocations would undermine draft policy EP1 “Economic Growth and Investment”.
  - Both allocations would be constrained by significant transport improvement works.
  - Both allocations would have an effect on designated and non-designated heritage assets.
6. We address each in turn.

**Issues 1 & 2 – Adverse impact on landscape character and loss of important functioning countryside**

7. By paragraph 17 NPPF, plan-making should:

*“... take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside”*

8. The Council concedes, within the Landscape Capacity Study, that the Golf Course site has only a medium capacity for development, and as such the allocation scores a partial negative within the SA.<sup>1</sup> Whilst on first sight the land presents as managed urban countryside, as Mr Napier explains in his statement (annexed to this hearing statement), the land has long been experienced as managed countryside; first, as part of the Kempshott Park estate and, latterly as a James Braid-designed golf course in the late 1920s. As such, Mr Napier explains the managed parkland appearance of the land is a central part of its landscape character.

9. Hounsome Fields is assessed as having a low capacity within the Landscape Capacity Study; it scores a double-negative within the SA<sup>2</sup> and within the site assessment documents. Oddly however, in a revised SA, the site is graded as “positive” without any explanation of the change in position.<sup>3</sup>

10. SWAG will rely upon the evidence of Steven Scott-Brown, a chartered town planner, of the Scott-Brown Partnership (annexed to this hearing statement) to demonstrate the SA fails to recognise the character and beauty of the countryside to the south-west of Basingstoke, and that the allocations fail to preserve that setting contrary to paragraph 17 NPPF.

11. The Inspector will note that the Hounsome Fields site was considered as an omission site by the Inspector of the Local Plan Review in 2005. Oddly the Inspector’s views

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<sup>1</sup> Examination Library SA04 Appendix 14p.210.

<sup>2</sup> Examination Library SA04 Appendix 14, p.232.

<sup>3</sup> Examination Library SA05 Appendix 18 (May 2015), p.156.

on the Hounsome Fields site and the location of the Basingstoke Golf Course site were not considered within the Council's SA. Within his Report, the Inspector concluded that:

*“Towards the northern end of the objection site there is a curving ridge line, broadly on an east-west alignment. When approaching Basingstoke along the A30, the town becomes readily visible only as this ridge is crossed ... The previous local plan Inspector considered that this site provided a particular valuable element in the rural setting of Basingstoke because it is close the down, but not dominated by urban uses. In my view, changes since that assessment was made have not weakened its validity. I recognize that housing at Kempshott Park now extends beyond the ridge to which I have referred, but this pocket of development is sandwiched between the golf course and the M3 and has very little effect on the rural character of the Objector's land. I also accept that boundary vegetation along the A30 frontage of the site is now taller and denser than when seen by the previous Inspector, but in my view it would be impossible to conceal from the A30 the change from a rural to an urban landscape that would result from the Objector's scheme. Development of this site would thus represent a substantial and harmful extension of the town into the countryside.”<sup>4</sup>*

12. It is SWAG's firm submission that those conclusions remain just as valid to the assessment of both Basingstoke Golf Course and Hounsome Fields in the Examination of the submission Plan. Both sites therefore perform an important countryside function of preventing urban sprawl.

13. To allocate both sites for development would completely and irreparably undermine the important function they serve and would be contrary to paragraph 17 NPPF, in that it would fail to take account of the “role” that particular piece of countryside serves. The allocation cannot be said to be “sound” on this basis, in that it conflicts with national policy.

### **Issue 3 – Loss of best and most versatile agricultural land**

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<sup>4</sup> Local Plan Review, Inspector's Report (2005) para.8.8.37.

14. Paragraph 110 NPPF requires Plans to allocate “land with the least environmental or amenity value”. As such, paragraph 112 NPPF establishes a sequential test as follows:

*“Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.”*

15. The NPPF Glossary defines “best and most versatile agricultural land” (“BMV”) as Land within Grades 1, 2 and 3a of the Agricultural Land Classification.

16. The SA confirms that within Basingstoke Golf Course 62% of the land is classified as Grade 2 and 1.31% is within Grade 1.<sup>5</sup> In the case of Hounsome Fields 81% of the site is Grade 3a (with 9% un-surveyed).<sup>6</sup> In comparison, the omission site at Lodge Farm (BAS103) has only 31% BMV Land,<sup>7</sup> Poors Farm (BAS102) has only 36% BMV Land,<sup>8</sup> with no BMV Land at Cufaude Farm (SS3.8).<sup>9</sup>

17. The Council has therefore failed to demonstrate, in accordance with national policy, that it has allocated land of lesser environmental value.

#### **Issue 4 - Unsustainable and isolated settlements dependent on private car-based transport.**

18. Paragraph 17 NPPF required Plans to:

*“... actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”*

19. The Council concedes that Hounsome Fields would be dominated by private car journeys. The SA continues to record that the allocation would fail to improve

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<sup>5</sup> Examination Library SA04 Appendix 14, 211.

<sup>6</sup> Examination Library SA04 Appendix 14, 233.

<sup>7</sup> Examination Library SA04 Appendix 14, 53.

<sup>8</sup> Examination Library SA04 Appendix 14, 78.

<sup>9</sup> Examination Library SA04 Appendix 14, 189.

sustainability of accessibility to local services or improve choice and access to sustainable transport options.<sup>10</sup> As such, the SA concludes in stark terms that:

*“... development of the site could potentially result in an isolated settlement due to its separation from the built form of Basingstoke. The site does not relate to existing settlement in terms of form, scale and character.”<sup>11</sup>*

20. Similarly the Council concedes the Basingstoke Golf Course allocation would require pedestrian, cycle and bus connections, as none exist at present and key services are a “moderate” distance away. As with Hounsome Fields therefore the SA concludes “car journeys are likely to dominate”.<sup>12</sup> Both sites are over 7km from the town centre by road. The Council again performs a drastic about-turn in its revised SA, and concludes the site will result in a “double positive” for sustainability without any explanation of its previous position.<sup>13</sup> The selection of sites that are so much farther from employment and the town centre than other rejected sites and which are so close to a motorway junction will inevitable make them car dominated. This means that the Council is failing to address one of the key issues it has identified as facing the Borough<sup>14</sup>; namely, the relatively high level of CO<sub>2</sub> emissions per capita compared with the South East of England regional and national averages.

21. These stark conclusions clearly demonstrate the Council has failed, contrary to national policy, to plan for a pattern of growth which makes “the fullest possible use” of modes of transport other than a private car.

#### **Issue 5 – Potential to undermine growth strategy**

22. It will be recalled that to be “sound” a Plan should be “effective”, which paragraph 182 NPPF defines as “deliverable”. By paragraph 2.8 of the draft Plan the Council identify the following as objectives which need to be achieved to realize the Council’s vision:

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<sup>10</sup> Examination Library SA04 Appendix 14, 237.

<sup>11</sup> Examination Library SA04 Appendix 14, 245.

<sup>12</sup> Examination Library SA04 Appendix 14, 215-216

<sup>13</sup> Examination Library SA05 Appendix 18 (May 2015), p.157.

<sup>14</sup> Examination Library CD01 para 2.6 p. 17 13th bullet point

- *Maintain and enhance the Borough’s position as a prosperous economic centre with a diverse economy, by supporting a range of employment sectors through the availability of employment land and premises of the right quality, type, location and size. This will be delivered through the protection and regeneration and/or redevelopment of the established strategic employment areas (such as Basing View) and the allocation of a new employment sites through a future DPD.*
- *Reduce the need to travel, providing sustainable and fully accessible transport opportunities, and promoting walking and cycling across the borough. Work in partnership to address issues around junction 6 of the M3 and the delivery of strategic transport infrastructure.*
- *Facilitate a well-educated and highly skilled local population and workforce with strong connections to the local business community and opportunities to access high quality education and jobs with lifelong learning for all.*
- *Focus the provision for new housing and supporting infrastructure within a number of development sites around Basingstoke town, with local level housing provision in our other main settlements, and homes which respond to local needs in smaller settlements”*

23. Draft Policy EP1 holds that inward investment will be achieved by:

*“a) Protecting strategic employment sites for employment use (B-class) and enabling the regeneration / redevelopment of these sites for employment uses”*

24. Both allocations are significant distances from the major employment areas as defined in the Employment Land Review (February, 2015). Mr Napier in his evidence has explained that the average distance to the major employment areas from Golf Course and Hounsome Fields is approximately 8.3km, whereas it is 5.2km from Lodge Farm (an omission site).

25. By allocating land furthest away from major employment uses, compared with omission sites, for residential use, the Council is potentially undermining the deliverability of its growth vision.

### **Issue 6 – Transport constraints**

26. The Mid Examination IDP Addendum May 2015 sets out the proposed infrastructure considered to be “necessary” for developing these sites without any analysis as to

whether this will be sufficient. It shows a total estimated cost of £43M, £20.2M of which is related to key junction improvements. Of this only £8.5M has so far been identified, leaving a shortfall of £11.7M for road improvements alone.

27. The Golf Course and Hounsome Fields Viability Study May 2015 shows indicative S106 strategic transport contributions from both sites of only £4M. This leaves a shortfall of £7.7M. It is inconceivable that proportionate shares of subventions from other sources such as CIL, New Homes Bonus or Growth Bonus can possibly make up this shortfall.
28. The Transport Assessment May 2015 at page 58 Table 4-10 shows the average delay at the Wallop Drive roundabout would grow to 6 minutes 24 seconds in the PM peak without the proposed improvements, compared with an average of 28 seconds with the improvements. The comparable figures for the Kempshott Roundabout at page 63 Table 4-16 show that the average delay would increase to 11 minutes 13 seconds in the AM peak without improvements, compared with 14 seconds with the improvements.
29. In respect of the other key junction on the A30 corridor, Brighton Hill Roundabout, SWAG understands that provisional funding has been offered by the Local Enterprise Partnership (LEP), but that the Council is currently reviewing the nature of the improvements necessary as part of the DCLG-funded masterplanning process associated with the Manydown development.
30. The opportunity for cycling and walking as alternative modes of transport from these sites is severely compromised by their distance from employment and the town centre and the steep gradients that have to be negotiated. This is evidenced by the fact that the Census 2011 showed that Hatch Warren and Beggarwood Ward (the housing developments closest to the proposed developments) had the lowest percentage of residents travelling by bicycle or on foot to their employment (only 3.8% compared with a Borough average of 11.9%).

31. An important element of the recently submitted Statements of Common Ground for these two sites<sup>15</sup> is a Transport Assessment. SWAG challenges the conclusions reached within these documents in respect of the feasibility of cohesion and inter-operability between these sites either side of the busy A30 and the practicality of pedestrian and cycle links to and from Basingstoke as well as the impact on the M3. This is covered fully in the evidence of Michael Henry in Annex 4.

32. In respect of bus provision, assertions similar to those in the Statements of Common Ground on public transport in the past at the adjacent development at Beggarwood were not realised. There was an inevitable delay before the bus company considered that there were enough houses in occupation to justify the introduction of a bus service, and developer contributions had expired before the development was complete. Even today, evening services continue to require subsidy from the local authority. Such delays and inadequacies contribute to the habituation of car usage by residents.

### **Issue 7 – Heritage Impact**

33. By s.66 Planning (Listed Buildings & Conservation Areas) Act 1990 when deciding whether to grant planning permission the Council shall pay “special regard” to the desirability of preserving the building or its setting. The Council’s SA notes that a Grade II farmhouse lies within the allocation at Hounsome Fields.<sup>16</sup> Whilst the SA correctly observes that the setting of the building would need to be protected, no assessment is advanced in the evidence base of the EiP as to how this will be the case and the impact that this will have on the potential yield of the site.

34. As to Basingstoke Golf Course, Mr Napier and Mr Howe in Annex 2 and 3 explain that it formed part of Kempshott Park and that its managed rural appearance was

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<sup>15</sup> Examination Library PS/02/49 and PS/02/50

<sup>16</sup> Examination Library SA04 Appendix 14, 243.

characteristic of its heritage. It will be borne in mind that the Glossary to the NPPF defines “heritage asset” as wider than statutory listed buildings or conservation areas, rather it includes:

*“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.”*

35. It is submitted that Basingstoke Golf Course, by reason of history as part of Kempshott Park and its sympathetic managed parkland appearance as a Golf Course, amounts to a “heritage asset” for the purposes of the NPPF. As such, the Council has failed to assess the impact that residential development, and consequential loss of managed parkland, would present for the purposes of paragraph 131 NPPF.

### **Conclusion**

36. For the above reasons SWAG will submit that the Plan is not sound, but could be made sound by allocating less harmful alternatives.

37. As such, SWAG will in due course invite the Inspector to recommend the housing distribution within the draft Plan is not the most appropriate strategy when judged against reasonable alternatives for housing growth contrary to paragraph 182 NPPF.

**ASHLEY BOWES**

**CORNERSTONE BARRISTERS**

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**11 September 2015**

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

**ANNEX OF STEVEN SCOTT-BROWN, MRTPI**

**ON BEHALF OF**

**THE BASINGSTOKE SOUTH-WEST ACTION GROUP (SWAG)**

**Covering objections to proposed allocations for housing at: Basingstoke Golf Course  
(policy SS3.11) and Hounsome Fields (policy SS3.12).**

**Evidence prepared by:**

This evidence has been prepared by Steven Scott-Brown. I have some 40 years plus experience in the planning process and have run my own consultancy since 1988. Prior to that I worked for a number of Local Planning Authorities, including as a Chief Officer. I gained an academic qualification in Urban and Regional Planning at Lanchester Polytechnic (now Coventry University) and was elected to Membership of the RTPi in 1972

**Scope of Evidence**

- 1.1. SWAG'S objection to these two proposed allocations is founded on the evident inconsistency with the Local Plan's Sustainability Assessment, which has been prepared as the cornerstone of the plan's spatial strategy, together with issues relating to:
  - i) the viability
  - ii) the assumed timing of these proposed allocations at which they are required to make a contribution to the District housing provision.
  
- 1.2. In assessing the merits of the two proposed allocations, SWAG also wishes to examine the basis on which the "housing numbers" required by the Local Plan are founded and to consider whether the numbers are set so high as to seek to present

an unchallengeable imperative for including what SWAG considers to be unsuitable sites in proposed Plan provision.

1.3. Finally, SWAG wishes to take issue with the outcome of the “balanced” spatial housing strategy adopted by the Council, which in reality envisages the bulk of provision to the west and the south-west of Basingstoke.

1.4. I deal first, briefly, with the way the housing requirement has been identified.

## **2. Housing requirement.**

2.1 SWAG does not have the resources to mount a full “housing numbers” case, nor is it reasonable to expect a voluntary association of local residents to have to do so, However, SWAG has identified – in para. 2.1 of its Representations to the Mid Examination Modifications consultation dated June 2015 – that the Plan housing requirement was based on a trend projection forward for some 30 years from growth figures simply for the period 2006-2011.

2.2 My view is that if trend projections are to be relied on for a relatively discrete area, such as a District Council, a longer past period of growth and change needs to be evaluated. For example, the Council’s own Annual Monitoring Report for 2014 contains a graph setting out historic housing completions back to 1996. This covers a reasonable range of economic and social conditions which prevailed at various points during this period, which ranged from slow economic growth until the end of the 1990s, quicker growth in the early 2000s, leading up to the financial crash of 2008-9 and to the slow recovery period since 2011.

2.3 The period also embraces different planning regimes – starting with the period prior to 1998 when housing needs were influenced by the work of SERPLAN, to the publication of RPG11 in 1999 which recognised a greater need for housebuilding in

the region to be implemented through the Regional Spatial Strategies, culminating in the situation post-abolition of the RSS system in 2011.

- 2.4 Housing provision – distinct from housing allocation – is a market-led activity. Market conditions are dependent on a wide range of factors beyond the remit of the Land Use Planning system – peaks and troughs in consumer demand, related to local and national economic performance, access to mortgage finance in what is essentially a housing-for-sale– led market, availability of housing in comparable towns in this part of the region (the sub-regional market), more sites coming onto the market in a given period, local/national interventions in the market by Government/institutions or by investment trends – e.g. a surge in purchase of “buy to let” property as the conventional investment market stagnated; and so on.
- 2.5 In the case of this Local Plan, population growth and housing number requirement for the period to 2029 have been essentially “growthed-up” from the period 2006-2011 which coincides with an exceptional and unrepresentative peak period of housebuilding in Basingstoke. This was at a time when the RSS was still in force and which envisaged strategic growth in what was defined as the Blackwater Valley and also the Western Corridor. We simply do not know whether those circumstances will repeat themselves over the coming years
- 2.6 On this basis, however, what the Plan does appear to be founded on is a housing requirement based on a 5-year peak building period projected over its whole lifetime – i.e. forward to 2029. As a general rule, this would increase the pressure on the Local Planning Authority to include sites which are less inherently sustainable in order to satisfy numerical housing needs.
- 2.7 On behalf of SWAG, I will examine this possibility in the context of the two sites which are the subject of the SWAG representations.

### **3. Sustainability issues.**

- 3.1. As we all know, sustainable development is defined, typically as “development which meets the needs of the present without compromising the ability of future generations to meet their own needs” (Our Common Future 1987).
- 3.2. The Sustainability Assessment – whose job is to underwrite a Local Plan – is required to provide a uniform and consistent framework within which “competing” proposals can be evaluated comparatively and the outcome then assessed against the identified needs of the community for housing, employment, education, leisure, safeguarding of heritage etc. Again, this must be set against the need not to compromise the future for the generations to come.
- 3.3. In terms of housing provision this means that both under-allocation and over-allocation should be avoided.
- 3.4. Under-allocation of developable housing sites should be avoided, as it leads to a shortage overall and acts against, in particular, those with the least ability to compete in the housing market. It inflates prices which in turn leads to wage inflation, which might eventually price out some employers and dissuade them from investing or expanding in the area.
- 3.5. Over-allocation should also be avoided, since it would lead to excessive provision of infrastructure which may not be needed, and also poses questions of viability of some sites whose development relies on expectations of market conditions favourable to development. In an area such as Basingstoke, which has limited brownfield land, it would also lead to unnecessary loss of greenfield land when the need had not arisen.

- 3.6. In my opinion, the appropriate way to make balanced housing provision is to base the requirement on a long-term assessment of past performance and future requirements, before allowing for additional population growth and additional inward migration.

**Recommendation:**

- 3.7. That the housing requirement of the Plan is based on a balanced assessment using longer-term data, rather than the peak building period 2006-2011**

**4. The Objection sites:**

**i). SS3.12/BAS133 Hounsome Fields**

- 4.1. This site was proposed for inclusion in the Local Plan in the Mid-Examination Modifications earlier this year. Its characteristics are assessed – in summary – in para. 8.53 of the Sustainability Appraisal. On first reading, para. 8.53 sets out a clear and compelling case why this site should **not** be allocated for housing development, irrespective of the Plan’s identified increased pressing need to allocate land for housing.
- 4.2. None of the normal sustainability indices appear to say anything positive about this site. It could result in “isolated development”, it does not relate well to existing settlement form, it has a low capacity for development in landscape terms, is disconnected from any existing development and also includes a high proportion of Best and Most Versatile Agricultural Land.
- 4.3. The site also lies on the opposite side of the A30 to most existing services, so problems of severance would arise. Finally, major sewerage infrastructure provision

would be required, which introduces fundamental questions as to financial viability and also whether the necessity of requisitioning works over third party land introduces uncertainty over when and possibly if, the infrastructure can be secured and connected.

- 4.4. Despite the fact that the authors of the Sustainability Assessment clearly thought this was a bad site which scored low on sustainability criteria and should not be considered for development, it has now been included. In my view this casts doubt either on the efficacy of the SA methodology or on the interpretation of it.
- 4.5. Logic suggests that assuming the object of the exercise was to identify sites which performed better or at least less badly, in order to be proposed to be allocated, sites which were assessed within the same matrix and which were not included must have performed even worse.
- 4.6. I therefore considered a number of these – BAS102, BAS103, BAS121 and BAS139 – which were included in the Strategic Housing Land Availability Assessment (SHLAA) and assessed in the Sustainability Appraisal (SA), but subsequently not carried forward in the Local Plan on the same basis.
- 4.7. All four of these sites have a substantial physical capacity for housing of a broadly similar magnitude to Hounsome Fields, ranging from about 450 to 900 units. (Hounsome Fields is put at 750).
- 4.8. Both BAS102, and BAS103 are described as isolated in themselves, although the SA summary acknowledges that this issue would be resolved if the two sites, at least, were developed in conjunction. Both are described as invoking sensitive issues with local landscape character and also issues such as biodiversity and flooding.

- 4.9. The SA summary in respect of BAS121 identifies similar landscape and flood risk issues, although it does state that improvements could be secured through green infrastructure works. It does recognise that there are no significant drainage infrastructure issues, although highway infrastructure works would be required,
- 4.10. Finally, the summary for BAS 121 expresses concern that if developed as a stand-alone allocation, the result would be an isolated development. This could be addressed if adjoining sites – BAS107 and/or BAS122 were developed in conjunction. The effect of built development at BAS139 on an area of undesignated “historic landscape” could be mitigated through layout and design.
- 4.11. The summary of the characteristics of these four “competing” sites all appear to me to show that whilst these sites might not be brought forward unless the housing numbers were urgently needed, they can at least be made acceptable through good planning practices. This is not the impression given by the summary for SS3.12/BAS133, which sets out the site’s disadvantages in unequivocal terms. Any one of these four sites could yield housing in roughly the same numbers as SS3.12/BAS133, so why are they not ahead of SS3.12/BAS133 in being considered for development?

**Recommendation.**

- 4.12. **Since the proposed allocation of SS3.12 is not supported by the Sustainability Appraisal and the site does not represent a sustainable approach to development, it should not be taken forward in the Plan.**
- ii) **SS3.11/BAS132 – Basingstoke Golf Course.**
- 4.13 The proposed allocation of this site also does not emerge from the SA with a row of ticks in the appropriate boxes, although it does fare somewhat better than

SS3.12/BAS133. As far as its sustainability credentials are concerned, it does have a number of actual and possible “negatives” and these are:

- the likely need for further highway improvements
- poor performance against the social objectives of the Plan, especially with regard to health considerations
- poor performance against the Plan’s Sustainable Communities provisions, as it would lead to the loss of an established sports and leisure facility, and
- it has a “medium” rating in terms of landscape impact.

4.14 The cost and timing of highway improvements is addressed in SS3.11 f) and also m). There is a clear expectation in the policy that improvements to the A30 corridor and mitigation of noise measures to safeguard new development against the intrusion of the A30 and M3 will be required. These will inevitably be substantial undertakings.

4.15 In addition, and identified in policy SS3 only is a need for on- and off-site sewerage and a “drainage strategy”. Development could only take place with substantial works of sewerage, which would involve extensive third party land and linking some considerable distance to the sewerage works at Chineham. This has implications for both cost and deliverability, especially given the reliance in the Plan that completions will come on stream from 2020.

4.16 In relation to health considerations, these relate mainly to the unnecessary additional car journeys that would arise from major development, which is more dependent on car journeys than sites to the east of Basingstoke. In addition, its location, close to the motorway, would make this an attractive residential location for car-borne commuters using the M3 for journeys towards Camberley, Woking, Heathrow etc. This would be both an unintended but inevitable consequence of

development at this location and would also reduce the contribution it would otherwise make to meeting Basingstoke's housing needs.

- 4.17 In relation to sustainable communities, this refers to the loss of a substantial open space/leisure asset which is unlikely to be replaced in the same area. I accept that it is a private facility but this may not be a permanent arrangement
- 4.18 In relation to landscape considerations, this site appears to be the beneficiary of a less stringent judgement than some of the "competing sites" with which I will deal in more detail, later. In essence, the site of SS3.11/BAS132 is a historic landscape, originally laid out as a Deer Park, and characterised by a strong relationship between landscape and vegetation, with built development being wholly subservient.
- 4.19 Development for 1000 houses and ancillary development will change this irrevocably. Yet the summary states that a "well designed layout" and an "appropriate quantum" of housing (any number as long as it is 1000?) could address concerns and "protect and enhance" landscape character.
- 4.20 How, in all honesty, can it do this when the landscape character will be fundamentally changed? There would be a new landscape form predominating. It could be very pleasant, but by no stretch of the imagination could it be an enhancement of the present unique landscape.
- 4.21 I compared this with the placing of demonstrably more weight in the assessment of site BAS139 (land west of Cufaude Farm) where the summary states that the effect of development on the setting of a historic farmstead would need to be mitigated through layout and design. This is an appropriate judgement – this is a single artefact on a substantial site which design must recognise. In the case of SS3.11/BAS132, the reference point is the landscape offered by the whole site

4.20 On this basis, the interpretation of landscape criteria applied to the two sites – one put forward in the Plan and one rejected – was significantly different, showing an evident lack of consistency of approach

### **Recommendation**

**4.21 That site SS3.11 should not form part of the housing allocation of the Plan, as it represents a broadly unsustainable development, would be separate from the main urban area and would encourage both excessive car use generally and settlement by residents from outside the area who would rely on the M3 corridor for commuting to work.**

### **4. The spatial strategy – east/west balance.**

5.1 Appendix 13a, first produced in the Mid-Examination Modifications to the Sustainability Appraisal, seeks to demonstrate how the Council arrived at its “preferred option” for the spatial distribution of housing development for Basingstoke town.

5.2 It arrives at the clear conclusion that “Option 1” which is to distribute sites around Basingstoke, is preferred on the basis of the five factors set out on pages 14 and 15 of the Appendix.

5.3 These factors are:

- i) this approach will distribute housing around the town, offering more choice to meet housing need.
- ii) By dispersing development around Basingstoke, development may be more integrated with the town than with the other options, and local consultation has favoured this approach.

- iii) It will assist deliverability, providing housing in different market locations and avoid over-reliance on major development areas which can only physically deliver a certain number of units on a site in any given year. It will also help to enable the market to provide new homes in a variety of locations to appeal to different house buyers.
- iv) There may be [an] opportunity to mitigate the potentially negative effects on the environment, including landscape and biodiversity, and enable more constrained areas to be avoided.
- v) Potentially it has a negative effect on some of the social objectives relating to sustainable communities, by making infrastructure provision more difficult and potentially less viable (bus services)

5.4 Despite the potential issue identified in factor v) this is preferred to Option 2, which concentrates on development on the east side of Basingstoke, and Option 3, (development predominantly to the west), with which SWAG are particularly concerned.

5.5 Option 3 - in the words of the Appendix:

“has been rejected and should not be taken forward through the Local Plan”

Yet, in effect, that is exactly what has happened. Through the proposed allocation, which the SA has already identified has very little to commend it (SS3.12/BAS133), and one over which the SA expressed significant doubts (SS3.11/BAS132), and together with others proposed (SS3.10 and SS3.4), around 75% of new housing would be in the very zone – the “western/south-western focus” which Appendix 13a clearly states has been rejected.

- 5.6 What should have taken place, in order to show that the Council has accepted its own advice and responded to it, is a reconsideration of alternative sites - including some previously rejected - which would have been consistent with the Preferred Spatial Strategy. Otherwise, we are left with the situation where the Council supports Option 1 but in practice has followed Option 3.
- 5.7 The justification set out in Appendix 13a for rejecting Option 3 is clear, and states:
- “this option may lead to less new housing to the east of the town, leading to less choice and impacting on housing delivery over the Plan period.
  - As this option is likely to involve a smaller number of large sites, this can cause further deliverability issues, due to the long lead-in times associated with large sites and the fact that there is a limit to the number of units that can be physically delivered on one site in any given year.”
- 5.8 This second point has been raised before by SWAG and others and in relation to SWAG’s objection sites in particular – SS3.11/BAS132 and SS3.12/BAS133 – throws doubt on the ability of these sites to deliver substantial new housing from 2020, on which the Plan depends.
- 5.9 The Final Conclusion to Appendix 13a also points out that the “balanced option” – Option 1 - indicates that this approach would do most to achieve the figure of 850 dwellings/per annum which is itself a “preferred option” of the Plan. In contrast, Option 3 is summarised as having more negative environmental effects in respect of landscape impact and in addition:
- “may not provide the quantum of housing that will help to achieve the 850dpa preferred, due to housing capacity of the available sites within the option area”.

- 5.10. This is a clear indication from the most recent revision of the Sustainability Appraisal, that reliance on development in the western/south-western focus **does not deliver what the Plan needs** in terms of housing numbers and the sustainable distribution of new housing.
- 5.11. However, before leaving consideration of the east/west balance, it is necessary to examine what Appendix 18, which is presented later in the same document as Appendix 13a, has to say about the two SWAG objection sites.
- 5.12. In marked contrast to the Appendix 13a assessment, Appendix 18 is altogether more supportive of development at both the Hounsome Fields and Basingstoke Golf Course sites. For example, both now rate “++” for sustainable transport and housing delivery, yet Appendix 13a cast serious doubts on both. These are fundamental contradictions within the same document, produced, presumably, at the same time.
- 5.13. When the Inspector raised issues about the “robustness” of the SA, one of the points of concern must have been the consistency of the document. It remains inconsistent, however, and worse it appears to have elements variously justifying a whole range of proposals. It is difficult to get a grasp on a document which justifies two sites in the south western part of Basingstoke at one point in the text whilst in another it clearly does not support them.
- 5.14. At the same time, whilst Appendix 18 appears to be tilting the balance more towards developing in the south-west quadrant, Appendix 13a still clearly advocates balanced development all around the town for the reasons set out earlier.
- 5.15. On this basis, the Plan clearly fails in bringing forward a consistent and comprehensible strategy for future development in Basingstoke.

## **Recommendation**

**5.16. The Inspector is requested:**

**a). to find that the proposed distribution of housing in effect follows Option 3 - which has clearly been rejected by the Council's revised Sustainability Appraisal - and to conclude that major developments in the south-west sector of the town such as SS3.11 and SS3.12 are not supported by the evidence base.**

**b). to find that the pursuance, in effect, of Option 3 is unlikely to result in the delivery of housing sufficient to meet the Plan requirement of 850dpa, and on this basis the Plan is unsound. Paradoxically, this view is supported by the Council in Appendix 13a of its own Sustainability Appraisal.**

EXAMINATION IN PUBLIC OF  
THE BASINGSTOKE & DEANE LOCAL PLAN  
ANNEX OF STAFFORD NAPIER  
ON BEHALF OF  
THE BASINGSTOKE SOUTH-WEST ACTION GROUP (SWAG)  
COVERING

1. HISTORY OF KEMPSHOTT PARK

AND

2. DISTANCE BETWEEN EMPLOYMENT USES PROPOSED ALLOCATIONS SS3.11 AND SS3.12

1. THE HISTORY OF KEMPSHOTT PARK AND ITS ASSOCIATION WITH BASINGSTOKE GOLF COURSE

**Evidence Prepared by Stafford Napier** based on his monograph: *BURNING PASSIONS – A BRIEF HISTORY OF KEMPSHOTT PARK*

1. We can trace the identity of those who have either owned or leased the Kempshott Park Estate for almost 1,000 years. The Domesday Book records Ealdred, brother of Bishop Odo as the holder of Kempshott with Hugh de Port as the Tenant in Chief.

2. After subsequent ownership as a farm by several local families, Kempshott Park was purchased by Philip Dehany, who in 1773-4 knocked down the original farm and built a much grander house. Here is a contemporary quotation: “...*(he) built a handsome large mansion of brick... on a gentle knoll to the south of the turnpike and very conspicuous from it...with an extremely handsome interior*”. Within 15 years Dehany sold the House and estate to a James Morley. His tenure of the estate was short. His wife died within a year of his purchase and he promptly sold Kempshott Park to John Crosse Crooke, a tenant of the Duke of Bedford at nearby Stratton Park.

3. The years from 1789 - 1795 saw one of the most remarkable periods of Kempshott Park’s varied history. The Prince of Wales, the future George IV, leased the House and Park from John Crooke for £600 p.a. from late 1789. He then proceeded to spend a further £4,300

(£240,000 today) making the House fit to be a Royal retreat. Hunting was the Prince's great passion and he built stables for his hunters and kennels for his hounds, thus changing the name of the adjacent farm from Kempshott Farm to Kennel Farm, a name it retains to this day. These stables and farmhouse still exist on the southern side of the M3. He used the parkland that is now Basingstoke Golf Course for raising the deer and stags that he so assiduously hunted across the whole County.

4. Once installed at Kempshott, the Prince and his notorious illegal "wife", Maria Fitzherbert, entertained royally. Kempshott was far enough away from prying eyes and the rumour mill of London for him to enjoy time with Maria. It also had an adjacent house, Southwood Farm, which is reputed to have been used as a more decorous lodging for Mrs Fitzherbert should the need arise.

5. Kempshott was also the house and park to which George subsequently brought his legal wife, Princess Caroline of Brunswick, on the night of their marriage in 1795.

6. The next of John Crooke's tenants at Kempshott Park was Lord Dorchester. As Guy Carleton, he had been a major influence on the passing of the Quebec Act 1774 and is known as the Father of Canada. Jane Austen was well acquainted with the Dorchesters and attended balls at Kempshott House. This aspect of Kempshott Park's history is covered by Phil Howe in Annex 3.

7. To give a flavour of the grandeur of Kempshott House and Park and its setting in what is now Basingstoke Golf Course, here is an extract from a description from 1833 when the house and estate were up for sale on the death of John Crooke.

*"The Mansion is happily placed in the most conspicuous part of this long admired Park in which there is an infinite variety of Hill and Dale, and such a delightful irregularity in the Grounds, as to create an interest which unceasingly manifests itself in varied forms"*

8. After ownership in the later 19<sup>th</sup> century by the Blunt and Rycroft families, the 1911 Census shows the Gourlay family in residence at Kempshott. The Gourlays had a daughter,

Molly, who had been born in 1899. It is of some importance that Molly Gourlay grew up in Kempshott House with its extensive views over the associated parkland.

9. Basingstoke Golf Club had been formed in 1907 and had used land just north of Basingstoke station. By the 1920s the Club was looking for an alternative site. The park at Kempshott proved ideal and in June 1927 the Club purchased the land from the Rycroft estate for £2,120. They employed the great golf course designer and five times winner of the Open, James Braid, to design the Course. The untold story of this is that there may well have been another reason for the site selection.

10. By 1927 Molly Gourlay, who had grown up at Kempshott, was one of the most famous lady golfers in the land. She had won several titles on the Continent and was a semi-finalist in the Women's Open in 1924. She went on to win the US Curtis Cup in 1932 and later, with her husband, became a golf course designer herself. Although she is not mentioned in Basingstoke Golf Club's history of the course, she was indeed there alongside Braid and Vardon at the opening in 1928 and made the first drive on what was a very wild, wet and windy day.

11. During the Second World War Kempshott House and its Parkland was used as a conference centre for the Ministry of War's own Petroleum Warfare Department and was a testing location for the flame throwing tanks, such as the Valentine, that played an important part of the Normandy invasion.

By the 1960s the House was said to be unsafe and was leaking badly. The derelict House was still there in 1971 after the M3 opened, although partly demolished. The M3 was built between 1968 and 1971 and passed just to the south of the House. The House and all of the contents had been sold at an auction on 15<sup>th</sup> July 1968. The House was demolished and 5 industrial units were built which have now themselves been demolished for the building of 57 dwellings. All that therefore remains of this once famous and noble House and Park are the stables built by the Prince of Wales in 1790 and Basingstoke Golf Course in its extensive parkland setting.

*Stafford Napier March 2013*

**A SELECTION OF PICTURES AND MAPS TO ILLUSTRATE THE ASSOCIATION OF KEMPHOTT HOUSE AND THE PARKLAND THAT IS NOW BASINGSTOKE GOLF COURSE**



*The Kempshott Park Estate in 1817*



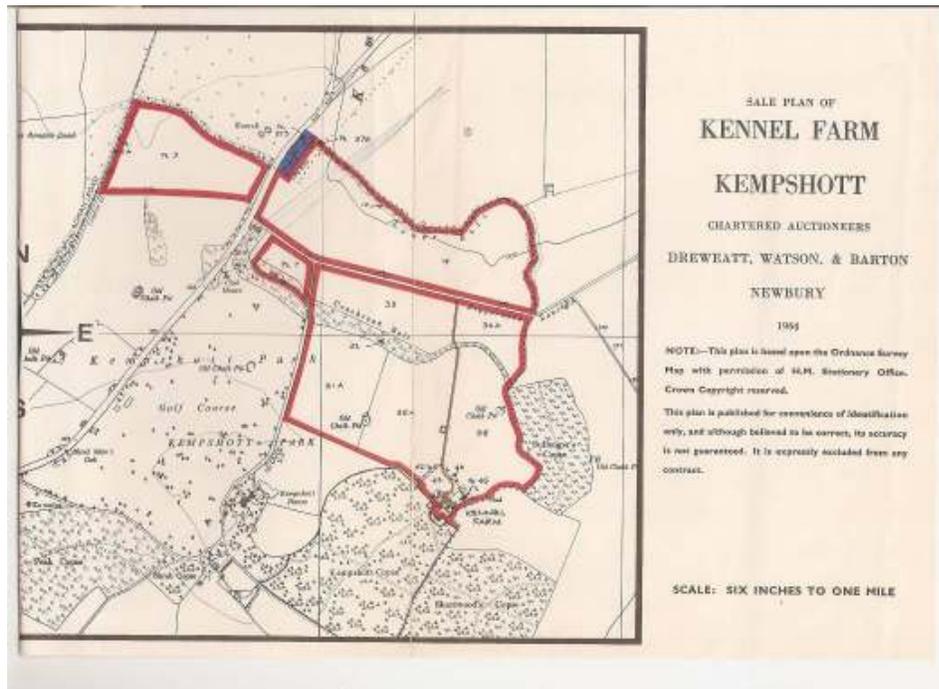
*The handsome House built by Philip Dehany in 1773 looking across what is now the Golf Course from the A30 Turnpike – courtesy of Hampshire Record Office*



*Thomas Milne's Map of Hampshire 1791.  
'Old Hampshire Mapped' courtesy of Jean & Martin Norgate*



*Kempshott House at the edge of the Golf Course 1960s showing the close relationship between the House and Park*



*The Plan of Kennel Farm and the Blue Hut Café for a July 1964 Auction showing that the Golf Course and Kempshott House formed part of what was known even then as “Kempshott Park” – courtesy Nigel Rea*

## 2. DISTANCE BETWEEN EMPLOYMENT TOWN CENTRE AND PROPOSED ALLOCATIONS SS3.11 AND

### SS3.12

1. The Table below shows the average distances from the sites specified to the major strategic employment areas identified in the Employment Land Review (ELR)<sup>17</sup>. The various hectareage of each employment site is also taken from the ELR. The distances shown are distances by car taken from Google Maps.

2. In the case of Basingstoke Golf Course, the distance is measured from the current entrance to the Golf Course on the A30. The measurement for Lodge Farm is taken from the current farm buildings.

**TABLE 1**

<b>COMPARATIVE ROAD DISTANCES FROM MAJOR EMPLOYMENT AREAS AND TOWN CENTRE</b>				
<b>Employment Area (Source Employment Land Review Feb 2014 exc Bramley and Whitchurch)</b>	<b>Size</b>	<b>% of total</b>	<b>South West (Golf Course &amp; Hounsome Fields)</b>	<b>East of Basingstoke (Lodge Farm)</b>
	<b>Hectares</b>		<b>Km</b>	<b>Km</b>
Hampshire Int Bus Park				
Chineham	26.0	7.5%	11.9	4.7
Chineham Bus Park	33.0	9.5%	11.2	4.0
Land South of Chineham Bus Pk	4.0	1.2%	10.4	3.3
Coronation Road	1.0	0.3%	9.2	4.7
Daneshill East	24.0	6.9%	9.4	2.7
Land North of Daneshill East	51.0	14.8%	10.0	2.3
Daneshill West	21.5	6.2%	9.5	3.3
Hatch	2.5	0.7%	9.9	3.2
<b>Eastern Areas</b>	<b>163.0</b>	<b>47.2%</b>		
Houndmills	88.5	25.6%	7.3	6.3
Moniton	2.4	0.7%	5.7	10.2
West Ham	12.8	3.7%	5.5	9.0
Basing View	21.0	6.1%	7.8	4.9
<b>Northern and Central Areas</b>	<b>124.7</b>	<b>36.1%</b>		
Viables	40.0	11.6%	5.0	8.0
Beggarwood	3.0	0.9%	1.1	11.9
Brighton Hill (Lister Road)	15.0	4.3%	4.5	7.6
<b>South West Areas</b>	<b>58.0</b>	<b>16.8%</b>		
<b>Total All Areas</b>	<b>345.7</b>			
<b>Average Distance to major employment areas weighted by number of hectares</b>			<b>8.3</b>	<b>5.2</b>
<b>Town Centre</b>			<b>7.2</b>	<b>4.6</b>

<sup>17</sup> Examination Library ETC01 ELR 2013 (Feb 2014) p 50

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

**ANNEX OF PHIL HOWE**

**ON BEHALF OF**

**THE BASINGSTOKE SOUTH-WEST ACTION GROUP (SWAG)**

**Covering part of the HISTORY OF KEMPSHOTT PARK AND ITS RELEVANCE TO  
JANE AUSTEN**

**Evidence prepared by: Phil Howe BA(Hons) Fellow of the Higher Education Academy, Fellow of the RSA, Hidden Britain Tours Ltd, Basingstoke**

1. I have been researching the history of the great estates in North Hampshire for 10 years and through my Company, Hidden Britain Tours Ltd, I offer guided tours of the area that Jane Austen knew in her first twenty six years. As part of my tours of the area I take visitors, many from overseas, to see the country houses where Jane visited and danced. I explain and demonstrate to clients the physical and cultural landscape, agriculture, geology, the political and social history of the late 1700s and how it relates to Jane Austen as a young girl, young woman and author as we tour the area. Kempshott Park plays a part in this tour.

We visit many of the great houses and estates that surround Basingstoke including Hackwood Park, home to the Lord Bolton, a classic country house comprising a walled estate, house, stable block, lake, and deer park; an architectural gem which has been preserved much as it was. We then see Farleigh House, home of the Portsmouth family, who played an important role in the fortunes of the Austen family.

On the road to Dummer we look down on the landscape of Kempshott Park and I explain the significance of the Lord Dorchester to Britain and Canada and to Jane Austen's social life. I also cover the stories of the scandalous behaviour of the Prince Regent, who occupied the house from 1789 to 1795. I explain the social role of hunting and how the landscape has been designed with hunting in mind. South Wood was part of the Kempshott Estate.

I am then able to show visitors many of the other great houses with which Jane would also have been familiar. These include Dummer House, Steventon Manor, Ashe Rectory, Deane House, Oakley Hall and The Vyne.

Finally I show clients Manydown, another estate where, like Kempshott, the house no longer stands. However, as with Kempshott, the landscape still has meaning and relevance to Jane Austen as it was the owner of Manydown who proposed to her; she accepted, and twelve hours later, rejected him. The parkland at Kempshott, which is now set out as a golf course, also acts as a visual reminder of the landscape that Jane Austen and her contemporaries would have known so well.

Clients leave with a greater understanding of the history, culture and the relationship that Jane Austen had with North Hampshire and the extent to which to which this context informed her novels.

Phil Howe August 28 2015

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

**ANNEX OF MICHAEL HENRY BSc CEng MICE  
ON BEHALF OF  
THE BASINGSTOKE SOUTH-WEST ACTION GROUP (SWAG)**

**Covering objections to proposed allocations for housing at: Basingstoke Golf Course  
(policy SS3.11) and Hounsome Fields (policy SS3.12).**

**Evidence prepared by:**

This evidence has been prepared by Michael Henry. I am a Chartered Engineer and a corporate member of the Institution of Civil Engineers. I hold an Honours Degree in Civil Engineering from the University of London. I have over 40 years experience in both the public and private sector, specialising in highways and transportation planning and design, including traffic and environmental impact studies. Seventeen years of my experience was spent in local government practice, in what was then the County Surveyor's Department of Hampshire County Council. I am now the principal of MJH Associates, a Highways and Transportation Planning Consultancy that specialises in expert advice on transport-related matters, mostly for private sector clients across the UK. I also act regularly as a road safety auditor for development road schemes under section 38 and section 278 of the Highways Act throughout England.

**Scope of Evidence**

- 3.8. My evidence for SWAG relates to three specific matters, to which I consider the Council have paid insufficient attention, and which support the SWAG submissions in objection to the above sites. The matters are
- i) Sustainability of these sites viz a viz pedestrian and cycle links to Basingstoke
  - ii) Severance between the sites caused by the A30.

iii) The impact of significant development on these sites upon the operational safety and capacity of the M3 due to weaving movements between junctions 7 and 8.

3.9. In preparing this statement I have had particular regard to

- i) The current (ninth issue) Transport Assessment (TA) prepared by Parsons Brinckerhoff for the Local Plan.
- ii) The Sustainability Appraisal (SA) prepared by the Council
- iii) The document entitled “Statement of Common Ground” (SCG) between the promoters of Hounsome Fields and the Council to which is attached as Appendix 6 a transport statement (TS) prepared jointly by the promoters of Hounsome Fields and the Basingstoke Golf Course site.

#### **4. Sustainability.**

2.8 As a general preamble, SWAG regards it as indispensable and self evident that any major housing development requires:

- a) Adequate means of connection for all traffic to the existing road network
- b) Agreement to provide or fund off-site highway improvements necessary to accommodate the development.
- c) A satisfactory masterplan that incorporates viable walking and cycling strategies, both within the site and to destinations in the wider community.

2.9 None of these issues are site specific, and the TS recognises these requirements, as do the TA and the SA. With the important exception noted in paragraph 1.1.iii, I do not dispute that the requirements to fulfil a) and b) can be met by the sites in question, but I consider that due to their separation from the built form of Basingstoke and the fact that together they straddle the A30, neither of these sites will fulfil either safely or sufficiently the aim of promoting walking and cycling in favour of car usage.

2.10 In that regard, not only do the sites fail to meet the overarching sustainability aims of Council policy (as well as those of the local highway authority, Hampshire County Council), but it is also surprising that no comparative transport sustainability

assessment has been carried out in any of the published evidence base available to me between the various housing allocation sites considered and rejected by the Council.

- 2.11 It is not for SWAG to carry out that comparative work, but I am struck by the number of alternative sites that have been rejected elsewhere, that on the face of matters are far closer and better located to employment and other existing principal destinations in and around the main part of Basingstoke. As such, I judge that these areas would offer far greater certainty about shifting travel modes away from car usage and towards walking and cycling.

### **3 Severance due to the A30**

- 3.1 Although originally promoted as stand-alone sites, I note now from the TS that both sites in question are seen by their promoters as linked together and that (TS App para 5.1.4)

*“the design of the proposed sites has considered the need to provide at grade pedestrian/cycle crossing facilities to allow walking and cycling between the two sites especially to provide sustainable connections from the Golf Course to the primary school on the Hounsome Fields site”.*

- 3.2 The main text of the SCG (para 5.1 page 6) states

*“Although the sites straddle the A30, through the creation of safe, legible crossing points reflecting desire lines, the sites will be interlinked to build a strong community with a clear shared identity.”*

- 3.3 Clearly the A30 crossing facility is not therefore seen as an enabling benefit for occasional travel between the sites but as an essential connector needed to create a single community, as well as to link across a primary school catchment area.
- 3.4 Whilst I understand the sentiment, I am not persuaded that the promoters of these two sites have thought through the challenges of providing safe access for non-motorised movements across the A30.

- 3.5 Both they, and it seems the Council by default, have been far too glib in their assumption that at-grade crossing facilities (even to full modern standards) are desirable, safe components of residential community links across a dual carriageway as fast and as busy as the A30 Winchester Road.
- 3.6 Speeds on this part of the A30 are presently limited to 50mph, and there is no proposal in the Local Plan to reduce this, and even if that were contemplated it is doubtful that new speed limits would be imposed lower than 40mph. I point out as well that much of the traffic along this road is extraneous traffic, that includes heavy goods vehicles, seeking access to Basingstoke, and as such it will never form part of the urban residential network related to either of the communities proposed alongside it. My understanding is that by 2029, traffic flows on the A30 will exceed about 5,000 vehicles in each peak hour, from which I infer that all day traffic flows are likely to exceed 45,000 vehicles.
- 3.7 Notwithstanding these high speed, high volume traffic flows, I have found no assessment in the evidence base for the Local Plan, or in any documentation provided by the promoters, of the social or road safety aspects of the severance caused by the A30. All documents available to me are silent on the matter and therefore I have to assume that there has been no objective environmental assessment of the issues, no proper road safety audit scrutiny in which the road safety implications of the strategic planning decisions have been fully considered, and no analysis of the possible alternatives that could mitigate severance more effectively and more safely.
- 3.8 I do not seek to question the analysis by the promoters that seeks to show that these crossing facilities can be provided without unacceptable impacts upon traffic capacity, but as a fundamental safety concern, I question strongly the desirability of expecting potentially large volume of pedestrians - especially primary school children (children aged 5-11) - to use such a crossing over the A30.
- 3.9 In this particular regard, I disagree with para 7.29 of the SCG which states that the A30 improvements proposed for the two sites

*“...will enable safe, healthy and sustainable routes to the school for all, and should in turn result in minimal car alone journeys and reduced congestion within the school vicinity.”*

- 3.10 I cannot see many parents allowing unaccompanied primary school children (aged 5-11) to cross the A30, particularly in dark winter conditions, even at a signal-controlled junction. Many parents and carers who accompany school children will also be pushing buggies with younger siblings “in tow”, and I think they too will be deterred from crossing the A30 in this manner. All of which I suggest militates strongly against the envisaged A30 crossing forming part of the Council’s desired safe healthy and sustainable (i.e. car free) route to school.
- 3.11 I have no doubt that the Council and the promoters will seek to show locations where precisely such circumstances apply, but I argue from my own experience that these situations are usually limited unavoidably to existing sites and are not the deliberate consequence of future housing allocation policies.

#### **4 Cycling and Walking**

- 4.13. The TS for the promoters focuses solely, and in my view simplistically, on travel distances as a determinant of the likely attractiveness of a walking or cycle route. (see TS paras 2.3 et seq). An elaborate case is therefore put forward suggesting the acceptability of long walking or cycle distances that then melds with the thrust of the site promoters’ argument that the two sites in question are well located in relation to the facilities in the centre of Basingstoke.
- 4.14. This conclusion however is at odds with the Council’s own SA (Appendix 14 page 250) which records for Hounsome Fields:
- “developing the site for housing would have some potential impacts relating to the environment, given that it could potentially result in an isolated settlement due to its separation from the built form of Basingstoke and the fact that it does not relate well to the existing settlement in terms of form or character.”*

- 4.15. Without engaging in a somewhat academic argument over mileages, I think it incontrovertible that the overall likelihood of someone choosing to walk or cycle in preference to taking their car is correlated to the distance involved.
- 4.16. Put simply, short cycle and walking routes are preferable. But other factors are also important, which in my view the Council and the site promoters have failed to recognise.
- 4.17. In essence, it is the overall effort involved in a cycle or walking trip, together with the real, or perceived, degree of conflict with vehicular traffic that mainly determine the attractiveness of such journeys. Trips that involve having to cross or run alongside fast moving busy roads will deter more vulnerable pedestrians and many younger cyclists from undertaking such journeys.
- 4.18. In the case of longer distance travel into Basingstoke, the site promoters conclude that cycle trips averaging 5-6 km into Basingstoke (the actual distance being over 7km) will be “reasonable” (paras 2.3.27-8) and by implication likely to be readily undertaken by residents of the new developments.
- 4.19. That view however gives no regard to the gradients involved in cycling between Hounsome Fields and Basingstoke centre, and takes no account of the multiplicity of major junction crossings involved in such a journey, both of which in my judgement are likely to deter all but the fittest and most dedicated cyclists.
- 4.20. The approximate ground level of the A30 at the proposed site accesses is about 168m AOD, which falls steadily to a level of about 85m AOD in the town centre. Over a trip of around 5km this represents an appreciable climb, which on that fact alone I think belies the confidence the promoters have in the route as one that will become attractive and well-used.
- 4.21. I have no details of the proposed shared use cycleway alongside the A30, promised in conjunction with the hospital site development to the east. But by any assessment, I consider that cycle/footway provision immediately alongside the A30 is not likely to be regarded favourably by many non-motorised users, (a group that includes a category of vulnerable people – young, elderly and disabled users).

- 4.22. Notwithstanding this judgement, the promoters of Hounsome Fields and the Golf Course development place considerable store on its provision, but somewhat equivocally state (para 3.2.3 of the TS, with my underlining)
- “In terms of walking and cycling, new links will be provided to connect with the good level of existing provision in the adjacent urban area as well the new facilities provide by committed development. These facilities may include a new footway/cycleway along the A30 provided by the proposed critical health Hospital. Development of the two sites provides the opportunity to deliver that link in the event that the hospital does not come forward”.*
- 4.23. In the main text of the SCG para 7.29 merely states
- “As matters progress, the LHA will expect to see the detail of how the sites will build upon existing walking, cycling and public transport provision to provide connectivity to local facilities and services and those further afield.”*
- 4.24. None of this implies a great confidence by either the Council or the promoters that a new cycle/pedestrian link into the town will be a sine qua non for any major development in the south west of Basingstoke, or that such a link will be delivered contemporaneously with that development.
- 4.25. As things stand, I am unsure whether this equivocation is due to uncertainties about whether or not the cycle/footway provision is economically deliverable or whether or not it involves third party land that may be costly or difficult to acquire.
- 4.26. In any event, neither the Council nor the promoters of the sites in question can have it both ways. Either they see the link as providing an essential and attractive alternative to car journeys into the town, and which therefore must form part of the obligations required by the Council before it commits to allowing development in this part of Basingstoke; or the Council accepts that the link may not, or cannot, be provided contemporaneously (if at all) with the housing development on Hounsome Fields and the Golf Course. In which case I consider that the Council has a duty to review its SA of these and alternative sites in and around Basingstoke.
- 4.27. If it were to do so, I am confident that the sites to which SWAG are objecting would, in transport sustainability terms, be seen in a considerably less favourable light than is the case at present.

**5. Impact upon the M3 Weaving between Junctions 7 and 8**

- 5.1. Finally in this evidence, I turn to a somewhat technical matter concerning the impact of development in the south-western corner of Basingstoke upon the operational efficiency of the nearby M3 junctions 7 and 8.
- 5.2. The position of the Council is neatly summarised in para 4.4.10 page 27 of the TS Appendix to the SCG.
- 5.3. In respect to the M3 Junction 7, the Basingstoke TA (Parsons Brinckerhoff report para 3.79) concludes that;  
*“the junction is shown to have sufficient reserve capacity to cope with the worst case scenario where all A30 traffic reroutes onto the M3. Therefore it is not necessary for any mitigation measures to be proposed in this transport assessment for junction 7.”*
- 5.4. I have no quarrel with that conclusion, provided of course it is confirmed by the more detailed and accurate traffic assessments promised for the Hounsome Fields development and by the more refined modelling work promised by Hampshire County Council later this year.
- 5.5. Essentially, however, the conclusions made by Parsons Brinckerhoff concern only the operation of the roundabout above junction 7; it makes no assessment of the slip roads merging onto or diverging off the motorway, and more crucially it takes no account of the effect of additional traffic weaving between the various slip roads between junction 7 and 8 of the M3 itself.
- 5.6. Both are crucial elements of a proper and complete traffic assessment arising from development in the vicinity of junction 7, and it is disingenuous to imply that sufficient analysis has been done to confirm no works are required to this junction or the motorway between junctions 7 and 8.
- 5.7. The design requirements needed to ensure the safe and efficient operation of the trunk road and motorway network are defined by numerous standards documents, compiled into the Design Manual for Roads and Bridges (DMRB). The standards document relevant to the point I am making is known as TD22/06, published in Volume 6 section 2 part 1 of DMRB
- 5.8. This standard defines the minimum separation required between motorway junctions (the distances between junctions 7 and 8 are considerably substandard in

this respect) as well the provisions needed to accommodate weaving (i.e. in rough terms, the amount of lane changing that occurs between the junctions).

- 5.9. I do not know how these junctions will fare in future once the inevitable additional traffic is loaded onto junction 7 from the developments SWAG are concerned with, but more importantly neither do the Council, Highways England or the promoters, because the necessary assessment work, all carefully defined in DMRB, has never to my knowledge been undertaken.
- 5.10. Historically the Highways Agency (now Highways England) stoutly resisted development around Dummer whenever it felt that the already substandard weaving provision between junctions 7 and 8 would be compromised still further. I have personally represented the Highways Agency as a consultant in doing so. I am therefore puzzled and concerned that in connection with this Local Plan, the issue has been so studiously ignored, especially as there must be a prima facie argument that a large amount of additional development close to Junction 7 is likely to add appreciably to the volume of traffic movements and weaving between junctions 7 and 8 of the M3.
- 5.11. My recommendation is therefore, in the interests of highway safety as well as the efficient operation of the M3 between junctions 7 and 8, that a weaving assessment should be undertaken as an essential task of the Local Plan evidence base before the Council commit to the sites opposed by SWAG.
- 5.12. If that assessment shows no issues of concern and that no interventions are required, then so be it. But if it shows problems in meeting standards, I think it will raise important issues that should be reviewed in the Local Plan evidence base before decisions are taken on allocating sites for major development in the south-western part of Basingstoke.