

# BASINGSTOKE AND DEANE LOCAL PLAN EXAMINATION

## ISSUE 2: SUSTAINABILITY APPRAISAL AND HABITATS REGULATIONS ASSESSMENT

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FOR TAYLOR WIMPEY  
(REPRESENTOR REF: 909792)

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

3.1.1 No.

3.1.2 As set out within Taylor Wimpey's Statement to Matter 4, the spatial distribution surrounding Basingstoke, set out within policy SS3, fails to align with the Council's Main Modification Sustainability Appraisal ("SA 2015") preferred spatial distribution option – Option 1: Spread of development. The policy SS3 distribution reflects the Council's rejected option – Option 3 – western/ south-western focus. The Local Plan with Proposed Modifications ("the LP") spatial strategy surrounding Basingstoke is therefore unsound and is not justified in the context of the Council's own spatial distribution reasonable alternative assessment.

3.1.4 As set out within Taylor Wimpey's Statement to Matter 4, this soundness failing, coupled with Taylor Wimpey's principal concern that the housing requirement within the LP is fundamentally too low to meet objectively assessed needs ("OAN") for market and affordable housing needs in full (National Planning Policy Framework ("NPPF") (paragraph 47)) and support economic growth and regeneration, could be rectified through further Main Modifications which: (a) increase the housing figure (policy SS1) to at least 1,100 dwellings per annum ("dpa"); and (b) allocates additional housing sites to the east of Basingstoke, such as the Taylor Wimpey sites (see Taylor Wimpey's Statement to Matter 6) to achieve the Council preferred SA spatial distribution option – Option 1 spread of development.

3.1.5 Without prejudice to Taylor Wimpey's principal concern regarding the LP housing figure being fundamentally too low, should the LP housing figure of 850dpa be accepted, for the LP to be sound the Council must recommend Main Modifications which adjusts the strategic allocations proposed within policy SS3 to achieve a more balanced spread of development around Basingstoke (please refer to Taylor Wimpey's Statement to Matter 4).

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

3.2.1 No.

3.3.2 The Council's approach to determining its housing figure has been driven, not by determining a complaint NPPF (paragraph 47) OAN figure, but by seeking to post-justify a figure of 850dpa, which the Council has taken from its interpretation of the Inspector's post Exploratory Meeting letter (PS/01/05).

3.2.3 As such, as set out within Taylor Wimpey's representations and Statements to Matters 3 and 4 the Council has failed to assess the following reasonable alternatives as part of the SA process: (i) the Council's purported housing market area's ("HMA") NPPF (paragraph 47) and the National Planning Practice Guidance ("PPG") complaint OAN for market and affordable housing in full; (ii) meeting the PPG (ID: 2a-015-20140306) demographic housing figure starting point (DCLG 2012-based household projection with vacancy rate) (936dpa); (iii) the Council's purported housing requirement (850dpa) (which is not accepted) and the extent to which identified unmet needs within neighbouring authorities could be met (please refer to Taylor Wimpey's statement to Matter 1); (iv) the PPG starting point figure (as set out within (ii) above) with a reasonable uplift in response to market signals (please refer to Taylor Wimpey's Statement to Matter 3); (v) a comprehensive strategic housing allocation to the east of Basingstoke comprising: (1) the Land East of Basingstoke site (SS3.9), the Redlands site (SS3.7), and Lodge Farm site (SHLAA Site BAS102); or (2) the sites listed within (1) with the inclusion of the Poors Farm site (SHLAA Site BAS103); and (vi) the Hodds Farm site to the east of Old Basing (SHLAA Site OLD005).

Audit Trail – Factual Inaccuracies

4.1.1 In assessing and rejecting the Lodge Farm site (SHLAA Site BAS102) as part of an individual or combined site (Taylor Wimpey has only ever promoted the site as a combined site with the East of Basingstoke site (SS.3.9)) the following factual inaccuracies have been made rendering the SA unsound: (a) as set out within Taylor Wimpey's representations and Statement to Matter 6 no development has been proposed on land within Flood Risk Zone 2 and 3; (b) no development has been proposed on land within areas affected by unneighbourly uses such as noise and odour pollution; and (c) the combined sites are accessible to existing social facilities and services and employment opportunities. It is noted that the SA outcome for the East of Basingstoke site did not identify accessibility as poor; and sites to the west of Basingstoke i.e. Manydown (SS3.10, which are further from Basingstoke town centre etc to the Lodge Farm site are not assessed negatively for accessibility).

4.1.2 The only rational course of action is for the Council to either: (a) seek a further suspension of the examination (between 6 to 12-months), to undertake the necessary work required to assess all reasonable alternatives and review the LP housing requirement and strategy accordingly, and rectify the SA factual inaccuracies; or (b) withdraw the LP and prepare an entirely new evidence base; LP and SA.