

Day 1 / Issue 2 - Sustainability Appraisal and Habitats Regulations Assessment

Question 3.

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

- 3.1.1 We do not believe the spatial strategy is supported by the SA. The SA indicates in section 8 and at appendix 13 that 3 options were considered:-
- 1 – Basingstoke focus for all development
 - 2 – Basingstoke focus and a spread of development to larger settlements in the borough
 - 3 – A spread of development to a greater number of settlements in the borough, where they have SPBs
- 3.1.2 Paragraph 8.32 of the SA explains that:-
- Option 1 has been rejected and should not be taken forward through the Local Plan.*
- The key conclusions from the SA of the option are:*
- Provision of housing solely in Basingstoke would not address local housing need in other settlements throughout the borough (objective 1: housing).*
 - It would also be less supportive towards existing and new community and commercial enterprises in the rural settlements due to limiting population growth outside of Basingstoke Town (objective 12: sustainable, prosperous economy).*
 - However, this option is more likely to result in a major development area or comprehensive development which may offer benefits in terms of infrastructure provision (objective 17: sustaining vibrant communities).*
- 3.1.3 Paragraph 8.33 continues:-
- Option 2 is the preferred option for spatial distribution of housing and should be taken forward through the Local Plan. The key conclusions from the SA of the option are:
- At this level of assessment, Option 2 has the fewest potential negative impacts due to its ‘middle-ground’ approach to the distribution of housing.
 - It addresses the main housing need in Basingstoke Town, but also provides some opportunity for new rural housing provision in the larger settlements (objective 1: housing).
 - It would also be supportive of economic growth within Basingstoke Town and provide support to the rural economy in the other larger settlements (objective 12: sustainable prosperous economy).
 - By confining new development to the larger settlements it will protect the character of most rural settings, and their landscape setting (objective 14: sustainable prosperous economy).
 - Development will also be directed to those rural settlements that already have some local services and public transport provision (objective 13: sustainable prosperous economy).
- 3.1.4 If one looks at the updated Housing Land Supply Statement (August 2015, and the scale of development proposed in Basingstoke relative to other areas it is clear, as set out below that the plan is Basingstoke centric

	Basingstoke	Elsewhere	Total
Existing LP allocations	272	40	312
SHLAA sites	1,035	64	1,099
Regeneration sites	200	-	200
Outstanding planning permission – large sites	3,974	492	44,66
SS3 allocations	6,240	60	6,300
SS5 allocations		666	666
	11,721 (89.9%)	1,322 (10.1%)	13,043
Outstanding planning permission – small sites			269
Windfall allowance			550
Total supply			13,862
Completions			1,951
			15813 ¹
Requirement			15300

3.1.5 Given the above it would appear to us that as the majority of the housing requirement is being accommodated through development within /around Basingstoke it reflects spatial strategy option 1 – which was rejected by the SA. Thus the spatial strategy advocated in the B&DLP is not in our opinion that which was supported by the SA. Thus the plan cannot be said to be justified - it is technically unsound.

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?

3.2.1 We made substantive representations on the pre submission LP in Oct 2013, the revised pre submission LP in June 2014 and the proposed modifications in June 2015. We understand the inspector has a full copy of our representations and will not as a result look to repeat them. Our principle concern as far as the SA is concerned is that:-

- The SA has not looked at all the reasonable alternatives as far as the housing no's are concerned in particular the merits of accommodating circa 850-900dpa;
- The SA did not, when reviewing the spatial strategy as part of the proposed modifications assess the merits of developing in the larger villages in the borough – it remained Basingstoke centric;

¹ NB this does not allow for any discounting. The updated Housing Land Supply Statement (August 2015) suggests the total net discounted supply is 13,707, suggesting a contingency of just 358 dwellings (13707+1951-15,300).

➤ The SA has not assessed the effects of the scale of growth proposed in the LP in Oakley (150 dwellings) relative to that it has itself promoted historically (200 dwellings), and has not looked at reasonable alternatives for growth in Oakley such as the 350 dwellings (100 via the Neighbourhood Plan and 250 via a strategic allocation on Park Farm).

3.2.2 Taking each point in turn we note that:-

Reasonable alternative housing no's

3.2.3 The SA assesses the merits of delivering 600, 750, 850 and 1000dpa across the plan period.

3.2.4 The Edge Analytics report of April 2015 (appended to the May 2015 SHMA (HO01) clearly demonstrates an OAHN range of 813 – 936dpa using the DCLG 2012-based headship rates. It also indicates a range of 840 – 1004pda assuming an employment target of 450 to 700 jobs. The mid-range being 875 and 922 respectively. As such the SA should in our opinion have assessed the implications of accommodating 900dpa as a reasonable alternative to that being promoted in the plan. In simple terms the effects of delivering 900dpa are bound to be different to those associated with delivering 850 or 1000dpa. 900 was a figure promoted by many, including us and should in our opinion have been assessed as a reasonable alternative.

3.2.5 We believe that an assessment of circa 900dpa would prove less environmentally damaging than 1000dpa and at the same time provide for greater social and economic benefits than the 850dpa that has been tested. The council's failure to test this option given the representations made thus far on the Local Plan and the findings of the Edge Analytics report of April 2015 lead us to conclude that the preferred option of 850dpa has been chosen merely to try to appease the Inspector. It does not reflect the more up to date evidence of Edge Analytics, is unjustified and leads us to believe the plan has not been positively prepared, is ineffective and does not meet national government guidance.

3.2.6 The updated housing land supply statement (August 2015) suggests in appendix 1 that predicted completion rates will exceed 900dpa from 2016/17 until 2025/26. As such the delivery of 900pda is clearly achievable.

Reasonable alternatives to the spatial strategy

3.2.7 As set out in our letter of the 15th June 2015 on the Proposed Mods, whilst not opposing the allocation of the land at Hounsome Fields (PM9 and PM15 - SS3.12 refers), we are concerned that no reasonable alternatives were assessed outside of Basingstoke. The comments made in the report to the Economic, Planning and Housing Committee on the 4 March 2015, (PS/02/14), especially those at para 4.27 are telling; additional development within the larger villages was dismissed as being contrary to the 'spirit of neighbourhood planning'. As a result the SA did not assess this option. It was however a reasonable alternative, especially given the debate at the pre

examination hearing and the submissions that have been made to date on the merits of sites such as Park Farm in Oakley – to which I return below. Failure to assess this alternative inevitable leads one to ponder whether the plan is as a result positively prepared. Whilst we appreciate a matter for issue 3 (Spatial Strategy) question 4.13, to some it could appear that the plan is too heavily reliant on development in and around Basingstoke – much of which is brownfield or large peripheral Greenfield sites remote from existing facilities and with long lead in periods. Both these forms of development land can have long lead in periods which could impact upon the BC's HLS, especially the 5 year HLS situation. In addition PDL can be costly and the upfront infrastructure costs significant such that in a downturn they become less attractive than Greenfield sites; and Greenfield sites, especially large Greenfield sites like the proposed allocations can have significant upfront infrastructure works that can delay delivery. Both can in addition have more complex land assembly issues to address than smaller urban extensions such as that which we are promoting at Park Farm in Oakley. Thus in order to provide for flexibility and a potential contingency against non-delivery/ delayed deliver, we believe that additional small Greenfield urban extensions should be allocated within the larger villages, in addition to that to be provided through the Neighbourhood Plans.

- 3.2.8 The SA in looking at reasonable alternatives should have considered the merits of smaller scale additional development in the main villages (Bramley, Kingsclere, Oakley, Overton and Whitchurch), either through strategic allocations or additional provision throughout Neighbourhood Plans. To assume this may, as suggested in the March 2015 committee report, come about through the Neighbourhood Planning process is naive, as is clear from figure iv of the updated Housing Land Supply Statement (Ref PS/02/43) which clearly indicates that the Neighbourhood Plans are just looking to deliver what is required of them through the LP process.

Reasonable alternative scale of growth proposed in Oakley

- 3.2.9 The SA has, in the past, considered the merits of no allocation, an allocation of 200 dwellings and an allocation of 250 dwellings in Oakley.² Whilst it concluded that an allocation of 200 dwellings was the preferred option, there was in effect little difference between this and the option that promoted 250(+) dwellings. Furthermore, as is clear from appendix 15 of the updated SA (April 2015), the assessment was generic – it did not relate to any potential sites. Despite this policy SS5 only looks to provide for 150 dwellings in Oakley. Not only do we believe Oakley has the capacity to accommodate more (see response to issue 6 – Omission Sites) we also believe the SA, in assessing reasonable alternatives should have assessed the implications of providing for the scale of development proposed in the LP. We say this as we believe there to be significant disadvantages for Oakley in providing for less than 200 dwellings. Oakley has the highest affordable requirement of the larger villages (425 dwellings) yet the scale of development proposed in the village relative to its affordable requirement is, at 150 dwellings, just 35%. Furthermore

² paras 8.137 – 8140 and Appendix 15 of the SA (April 2015) refer

assuming a 2.4 persons per household it would only amount to a 7% increase in population. The level of development proposed in Oakley seems disproportionately low compared to the other villages, and the impact on affordable provision is such that we consider the implications of providing just 150 dwellings in Oakley should have been assessed by the SA, and that the lack of any such assessment means the SA is flawed and the plan unsound as it is not positively prepared, justified, effective or consistent with national policy.

- 3.2.10 In addition to the above, we believe the SA should also have considered the merits of a larger scale of development in Oakley – 100 dwellings through the Neighbourhood Plan and 250 at Park Farm Oakley. We have promoted this site for a number of years, and the Borough Council are aware of the fact it is one of the identified sites in the Oakley and Deane Neighbourhood Plan (which has now been formally submitted to B&D and is at Reg 16 consultation at present). To ignore this as a reasonable alternative suggests that the SA is not independent, but predicated on a view that any development in Oakley should be via the Neighbourhood Plan process.
- 3.2.11 In the context of the above we note that the latest SHLAA (August 2015 (ref PS/02/14)) indicates in appendix 4 (p193) that the land at Park Farm is not suitable for strategic allocation but could come forward through alternative mechanisms such as neighbourhood planning. Given the fact the Oakley and Deane Neighbourhood Plan has been formally submitted to B&D and is at Reg 16 consultation at present the comments in the SHLAA seem out of date, and to have no regard to either the scale of development proposed in the NP and that which could be provided in addition, as set out in our representations to date.
- 3.2.12 To conclude, the SA has not assessed the reasonable alternatives to the scale of growth proposed at Oakley, and as a result the LP is not positively prepared, justified, effective or consistent with national policy.