



*Basingstoke
and Deane*



Examination of the Basingstoke and Deane Local Plan (2011 to 2029)

Basingstoke and Deane Borough Council Rebuttal Statement

Issue 2: Sustainability Appraisal

2 October 2015

The purpose of this document is to respond to the Inspector's supplementary questions (dated 29 September 2015) and to provide a rebuttal to the related issues raised by third parties in their written statements to the Inspector's original questions.

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

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

Supplementary question

3.1 What is the reasoning for the reduction from 4 to 3 options in para 5.31 of the SA document PS/02/16?

Issues raised

- The plan is too Basingstoke focussed and therefore the spatial strategy does not accord with the SA preferred option for the spatial distribution of housing in the borough (Appendix 13) which is "Basingstoke focus and a spread of development to larger settlements in the borough". The spatial approach was not revisited at the proposed modification stage.
- The SA concludes that the preferred option for the spatial distribution of housing for Basingstoke town (Appendix 13a) is a distribution of sites around Basingstoke. However, the Local Plan is more in line with option 3 (focus to the west/ south-west of Basingstoke) and therefore the preferred option for a distribution of sites around Basingstoke has not informed the spatial strategy/ plan. They contend that sites to the east (BAS102 – Lodge Farm, BAS103 – Poor's Farm and OLD005 – Hodds Farm) should be allocated instead of Hounsome Fields and Basingstoke Golf Course to ensure a more equal balance between the east and west, in line with the SA results.
- Question over whether the numbers assigned to the settlements in policy SS5 are suitable and whether adequate consideration has been given to providing a higher level of development.
- The natural environment elements of the spatial strategy are only very loosely supported by the SA process and a general view that biodiversity has not been sufficiently covered through the SA.

Rebuttal

Progressing from 4 to 3 options for the spatial distribution of housing for Basingstoke Town

- 3.1.1 Appendix 15 of the earlier SA (SA04) (April 2014) included an option for the spatial distribution of housing for Basingstoke Town to focus to the west of

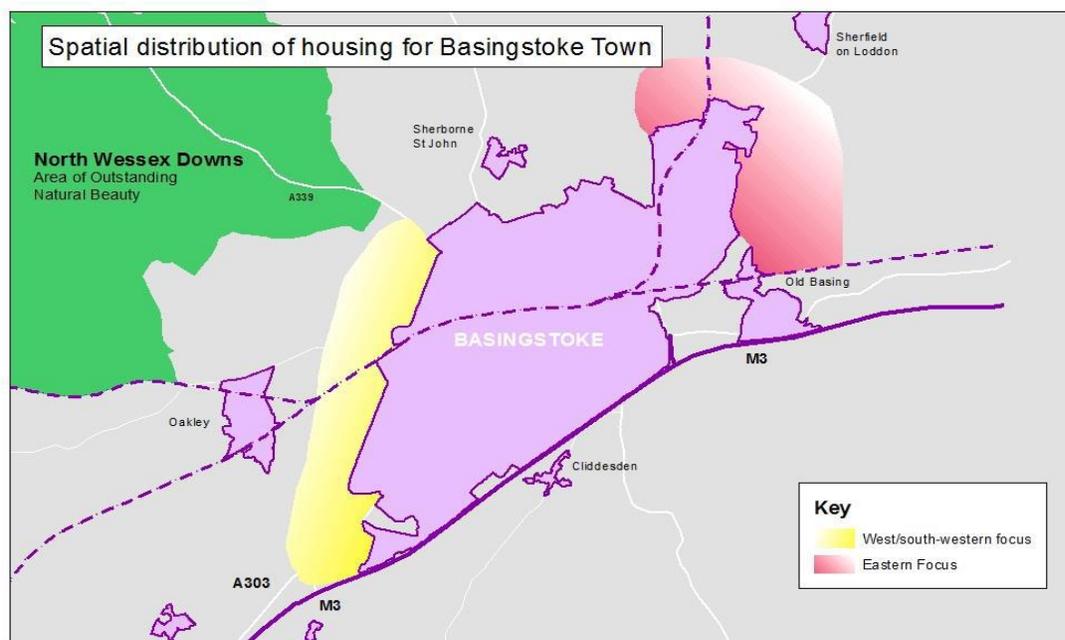
Basingstoke. The components of option 4 are described in appendix 15, which lists the sites and their expected capacity. This option was not appraised in the latest SA (inc. SEA) (PS/02/16) as it was no longer considered to be a reasonable alternative i.e. it was not realistic or deliverable¹. As indicated in appendix 15 of the earlier SA, option 4 (western focus) included SHLAA site BAS098 (Manydown) for approximately 5,000 dwellings. The council now considers that this quantum of development on the site is unlikely to be delivered within the plan period. This was confirmed in section 3 of appendix 15 of the latest SA (inc. SEA) (PS/02/16) which states:

“It is worth noting that a western focus option for Basingstoke Town was assessed, as outlined in Appendix 13a, prior to the submission of the Local Plan. This is no longer considered to be a reasonable alternative. The option would include a quantum of development on Manydown which could not be delivered within the plan period.”

- 3.1.2 Appendix 13a appraises three options to address whether there are any inherent sustainability benefits to a focus of housing development in one particular part or quadrant of the town. The options assessed reflect the location of available development sites around the town. Options 2 (Eastern focus) and 3 (western/ south-western focus) are indicatively shown on the following map (map 5 within the latest SA (inc. SEA) Report and map 1 within appendix 13). Although option 3 appraised in appendix 15 of the earlier SA is titled “south-western focus” and option 3 appraised in appendix 13a of the latest SA is titled “western/ south-western focus” both options incorporate land which is associated with land at Manydown, but for a quantum of development that is considered more likely to be delivered within the plan period. Option 3 has therefore remained constant between the earlier SA work and that within PS/02/16.

¹ The NPPG (reference ID: 11-018-20140306) defines reasonable alternatives: “Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.”

Map 5 in latest SA (inc. SEA) Report: Spatial distribution options for Basingstoke Town



Spatial distribution of housing in the borough

3.1.3 The preferred option for the distribution of housing in the borough as appraised in appendix 13 of the latest SA (inc. SEA) (PS/02/16) is 'Option 2 – Basingstoke focus and a spread of development to larger settlements in the borough'. Appendix 15 of PS/02/16 provides a summary of the option as follows "This option would focus significant development at Basingstoke Town, but with some distribution to the borough's larger rural settlements of Oakley, Overton, Whitchurch, Kingsclere and Bramley..." (emphasis added). The spatial strategy in the Local Plan directly accords with the preferred option. Basingstoke Town is, by a clear margin, the borough's largest and most sustainable settlement and has the highest housing need of all settlements in the borough. The option does not specify the exact proportion of development to be directed to Basingstoke versus the larger settlements.

Spatial distribution of housing for Basingstoke town

3.1.4 Appendix 13a PS/02/16 appraises three options to address whether there are any inherent sustainability benefits to a distribution of housing development in one particular part or quadrant of the town. The preferred option is for a distribution of sites around the town.

- 3.1.5 There are several similarities between how the options perform in the SA. For example, all three options support the economic objectives due to proximity to employment opportunities and all entail a significant amount of greenfield land. The appraisal also highlights that the three options all have positives and negatives. These are considered to be normal outcomes of a high level assessment.
- 3.1.6 However, the conclusion in appendix 13a explains when compared to the other options, the preferred option will:
- distribute housing around the town offering more choice and greater integration with the town than with the other options;
 - provide a quantum of development that will most help to achieve the 850 dpa preferred option;
 - allow a better opportunity for development to be located on the least constrained and most sustainable sites.
- 3.1.7 The option for a distribution of development around the town does not require an equal balance of development but sets the approach for the council to assess sites around Basingstoke town for their suitability.
- 3.1.8 Taking into account the preferred options in appendix 9, 13, 13a and 14, the SA goes on to identify 10 sites that should be considered for allocation in the Local Plan adjacent to the settlement policy boundary of Basingstoke town. The suitability of these sites is also justified through the council's other evidence base documents. Of these 10 sites, 3 are located in the south-west, 1 in the west, 3 in the east, 2 in the north-east and 1 in the north of the town. The allocation of these sites is in line with the principle of distributing sites around the town whilst enabling the allocation of sites that offer fewer constraints and more benefits when compared to the alternatives. The allocation of land at Manydown skews the proportional balance between the west/ south-west and east of Basingstoke but this is not considered to be a reason not to allocate it. The council considers the preferred sites do provide for a 'distribution of sites' around the town and that the strategy is not in conflict with the SA.

Biodiversity considerations in the SA

- 3.1.9 The SA (inc. SEA) considers the three dimensions of sustainable development namely economic, social and environmental matters. Biodiversity is one of several environmental matters considered through the SA as reflected in sustainability objective 4 which is 'To protect, and enhance local biodiversity, flora and fauna'. The assessment of issues and options against this objective

(including spatial options, sites and policies) has enabled biodiversity to be fully considered throughout the comprehensive SA undertaken by the council.

3.1.10 Each version of the SA (inc. SEA) has also been subject to public consultation including with the statutory consultees, which includes Natural England. As indicated in the council's Duty to Cooperate Statement (page 23 of CD08), Natural England agree that the SA (inc. SEA) meets the regulatory requirements.

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

Supplementary question

3.2 *Several alternatives have been put forward in representations, such as developing on land to the south of Junction 6 on the M3, and a new settlement at Micheldever. Is the Council satisfied that the SA has covered all the reasonable alternatives for development in B&D?*

Issues raised

- the SA has not looked at all the reasonable alternatives as far as housing numbers are concerned, in particular the merits of 850-900 (middle of the OAN ranges) and higher levels.
- question the council's reasoning for failing to direct additional housing to the borough's rural community 'i.e contrary to the spirit of neighbourhood planning'. The council dismissed this strategy on the basis that it could undermine the community-led planning work being undertaken in these settlements.
- no reasonable alternatives being assessed for outside of Basingstoke Town at the proposed modifications stages. Should have considered a higher level of development in the borough's rural towns and villages.
- the SA has not assessed the reasonable alternatives to the scale of growth proposed at Oakley or alternative approaches such as an allocation plus a housing figure. Consider that the level of development in Oakley is disproportionately low. Suggested that we should have considered larger scale development in Oakley i.e 100 dwellings through neighbourhood planning and 250 at Park Farm.
- the plan is too heavily reliant on development in and around Basingstoke town. Additional greenfield urban extensions should be allocated to the larger villages to provide contingency.
- the SA is not independent, but predicated on a view that any development in Oakley should be via the neighbourhood plan process.in proposing to meet

- the additional housing requirement, the council's SA only reviewed individually and cumulatively all the remaining unallocated sites within the SHLA deemed to be category 1 sites. This action omitted from the process the assessment of any sites previously deemed category 2, either in isolation or in combination with other category 1 sites.
- reasonable alternatives were considered through the SHLAA process.
 - as not all of BAS121 was no longer available this materially influenced the decision on the removal of BAS102 and BAS103 i.e any development of BAS102 would need to be linked with new allocation sites to the west (BAS121).
 - Consistency between appendix 13a and appendix 18 (please note this matter was raised in a written statement for issue 5).
 - the SA of sites includes factual inaccuracies.

Rebuttal

Reasonable alternatives for the spatial distribution of housing in the borough

- 3.2.1 The council is satisfied that it has covered all the realistic, deliverable and therefore reasonable alternatives for the spatial distribution of housing in the borough. The reasonable alternatives take into account the objectives of the Local Plan.
- 3.2.2 As explained in 8.20 to 8.26 of the SA (inc. SEA) Report and appendix 10 of the SA, an initial appraisal of the approaches to greenfield development in the borough (as set out in the Issues and Options (PV07)) included the option for development south of the M3. This option is shown illustratively on map 4 in the SA (inc. SEA) Report. Land to the south of the M3 has not been promoted to the council as an available site through either the SHLAA or Local Plan process and therefore it is considered that this option is not deliverable and therefore does not constitute a reasonable alternative. In addition, land to the south is separated from the town by the M3 which provides a strong physical boundary between the urban and countryside areas. Development in this location would result in significant environmental effects due to the landscape constraints of the location and would be unlikely to perform better than other options for development around Basingstoke town.
- 3.2.3 A new settlement at Micheldever is also not considered to be a reasonable alternative for the following reasons:
- The potential new settlement would be within Winchester City area and is therefore not within the borough.
 - As noted in the council's Duty to Co-operate Statement (CD08) on page 17, discussions took place with Winchester City Council regarding a legal challenge to the Winchester Core Strategy. Underlying that challenge was the

- landowner's aspiration for the development of Micheldever Station as a housing site to meet sub-regional needs but the site was not promoted directly at that stage, having been previously rejected in regional, strategic, and local planning decisions leading up to the Winchester Core Strategy.
- The landowner's legal challenge to the Winchester Core Strategy was unsuccessful.
 - As confirmed in CD08, Winchester City Council agree that the borough does not form part of a Housing Market Area with Winchester. The council can also meet its own housing needs within the borough.

Housing growth options

3.2.4 Following the Exploratory meeting and in light of further work undertaken by the council, the following housing growth options were subject to SA (inc. SEA) in appendix 9:

- 600 (dpa)
- 750 (dpa)
- 850 (dpa)
- 1,000 (dpa)

3.2.5 The preferred option is 850 dpa as it meets the objectively assessed housing needs of the borough. As explained in appendix 9, the 850 dpa is towards the middle of the "narrowed" objectively assessed housing need range and therefore best reflects the council's evidence base. It also presents an appropriate balance between housing and jobs, so that housing provision does not constrain job growth. This option does require additional greenfield allocations, but the social and economic benefits can be seen to outweigh the environmental impacts.

3.2.6 It is important to highlight that the SA is not the only factor in the preparation of the plan. The preferred option also best reflects the council's other evidence base. It was therefore concluded that an assessment of other reasonable alternatives between 850 dpa and 1,000 dpa was not necessary. The SA did not consider an option over 1,000 dwellings because there was little evidence to suggest that housing need was likely to be significantly higher than that. An option above 1,000 dwellings was not therefore considered to be a reasonable alternative having regard to the objectives of the Plan to meet the identified needs.

Allocations in settlements outside Basingstoke town

3.2.7 As explained in paragraph 8.125 of the latest SA (inc. SEA) Report (PS/02/16), given the preferred option of locating some development at the borough's larger settlements, the SA at appendix 15 considered the social, environmental and

economic implications of different development options, including a no growth option, at each of the borough’s largest settlements, namely Bramley, Kingsclere, Oakley, Overton and Whitchurch. To maintain an effective emergency plan in relation to the Atomic Weapons Establishment (AWE), the provision of any levels of new housing in and around Tadley has not been considered in the SA (inc. SEA).

3.2.8 A minimum of three options were considered for each of the five settlements. The potential development levels were considered by the council to be reasonable alternatives to consider in the plan making process taking account of such factors as the size of the settlement, past development levels, future opportunities, levels of local housing need and settlement characteristics and constraints.

3.2.9 Table 1 below identifies the options appraised for settlements outside of Basingstoke Town in appendix 15 of the earlier SA (inc. SEA) and PS/02/16, and summarises the conclusions regarding which option was considered most suitable when assessed against the sustainability objectives.

Table 1: Options appraised for settlements outside of Basingstoke Town in SA (inc. SEA) for Submission Local Plan and in SA (inc. SEA) for the Submission Local Plan inc. proposed main modifications

Options appraised in SA (inc. SEA)	SA (inc. SEA) for the Submission Local Plan and SA (inc. SEA) for the Submission Local Plan inc. proposed main modifications
Bramley	<p>For Bramley, three options were considered:</p> <ol style="list-style-type: none"> 1. No housing allocation 2. Allocation for 200 dwellings 3. Allocation for 300 dwellings <p>Given the preferred spatial approach of dispersing some development to the larger settlements in the borough, the size of the village, local housing need, the availability of local services and facilities, but also taking into account the relatively high levels of development experienced in the village in recent years, option 2 is the preferred approach.</p>
Kingsclere	<p>In Kingsclere, the 3 following options were considered:</p> <ol style="list-style-type: none"> 1. No housing allocation 2. Allocation of 50 dwellings 3. Allocation of 150+ dwellings <p>Given the preferred spatial approach of dispersing some development</p>

	<p>to the larger settlements in the borough, the size of the settlement, the availability of some local services to meet day-to-day needs, but taking into account the relatively constrained nature of the settlement particularly in landscape terms, option 2 is the preferred approach.</p>
Oakley	<p>In Oakley the 3 following options were considered:</p> <ol style="list-style-type: none"> 1. No allocation 2. Allocation for 200 dwellings 3. Allocation for 250+ dwellings <p>Given the preferred spatial approach of dispersing some development to the larger settlements in the borough, the size of the settlement, local housing need, the availability of some local services and facilities, and relatively low levels of development in the village in recent years, and option 2 is the preferred approach. It should be noted that following further consideration between April and July 2013, the council reviewed its position with regards to Oakley, and revised the figure down to 150 units. This is discussed further below.</p>
Overton	<p>In Overton the following 3 options were considered:</p> <ol style="list-style-type: none"> 1. No allocation 2. Allocation for 120 dwellings at Overton Hill 3. Allocation at Overton Hill and additional 150 dwellings <p>Given the preferred spatial approach of dispersing some development to the larger settlements in the borough, the size of the village, local housing need, and the level of facilities and services available and its link to higher order services, Option 3 is the preferred option.</p>
Whitchurch	<p>In Whitchurch the following 4 options were considered:</p> <ol style="list-style-type: none"> 1. No allocation 2. Allocation for 150 dwellings at Bloswood Lane 3. Allocation for 150 dwellings at sites Bloswood Lane plus an allocation for 200 dwellings, totalling 350 dwellings 4. Option 3 plus a further allocation of 100+ dwellings , totalling 450+ dwellings <p>Given the preferred spatial approach of dispersing some development to the larger settlements in the borough, the size of the town, the availability of local services and facilities in Whitchurch and its links to higher order services, local housing need (and relatively limited development in recent years), but also the constraints to accommodating significant levels of development in the town, including the historic highway network and its resulting impacts, it is considered that option 3 is the preferred option.</p>

- 3.2.10 For Overton and Whitchurch, the SA considered option(s) which included a specified site (greenfield site allocation), based on the most sustainable sites for these settlements plus an additional quantum of development to be delivered through such mechanisms as neighbourhood plans. This approach was taken for these settlements in particular in light of their sustainability credentials, size, needs and characteristics.
- 3.2.11 The specified site included in some of the options for Overton and Whitchurch was directly informed by appendix 14 of the SA and other relevant parts of the evidence base. Appendix 14 appraises the category one² greenfield sites in these locations.
- 3.2.12 The SA suggests that the preferred development level for Oakley is 200 dwellings. However, an allocation of approximately 150 homes has been made for Oakley through policy SS5 (Neighbourhood Planning) of the Local Plan. The council considered an allocation of approximately 150 homes would be more suitable in light of the significant level of development allocated on sites adjacent to the parish boundary, within which some housing need of Oakley settlement could be met. The council considers that there is no significant SA consequences with the allocation of 150 dwellings for Oakley when compared to the tested options. Taking into account that the SA is not the only factor in the preparation of the plan, it is worthy of note that 8% (23 hectares) of the Manydown allocation (policy SS3.10), which is allocated for 3,400 dwellings, is within Oakley and Deane parish.
- 3.2.13 There are two category one sites in Bramley both of which have been appraised in appendix 14. However, the council did not consider an option which contained a specified site plus an additional quantum of development to be delivered through such mechanisms as neighbourhood plans. This is in recognition of the high level of recent development in the village which increased in size by approximately 20% over the last 10 years(as explained in detail in section 5 of the Pre Submission Bramley Neighbourhood Plan PS/02/54). The framework provided by the Plan allows the local community to identify a locally supported approach to accommodating growth rather than allocating a specific site.

Further work undertaken following the Exploratory meeting

- 3.2.14 Following the Exploratory Meeting, the council considered the options of including additional allocations/ an allocation in the settlements listed in Policy

² Category One sites were those identified in the SHLAA as those greenfield sites which, on the basis of information available at the time of the SHLAA, were considered worthy of further consideration for inclusion as strategic allocations in the Local Plan, based on a number of suitability factors.

SS5 (Neighbourhood Planning) or, alternatively, increasing the number of homes that the neighbourhood plans for Bramley, Kingsclere, Oakley, Overton and Whitchurch need to deliver.

3.2.15 Appendix 9 of the earlier SA assessed levels of growth ranging from 400 dpa to 1,000 dpa and a spatial strategy had been put forward which the council considered was the optimum having regard to the sustainability implications of different levels of growth. Although the level of growth needed to meet the Objectively Assessed Need (OAN) has now increased, it still sits within the upper limit of what was originally appraised. Appendix 9 in PS/02/16 still takes 1,000 dpa as the upper level of the “reasonable alternatives” to be considered. The council therefore considers that the higher housing level did not affect the validity of the original spatial strategy, which favoured Option 2 (Basingstoke focus and a spread of development to larger settlements in the borough) rather than Option 3 (A spread of development to a greater number of settlements in the borough, where they have SPBs) in order to accommodate the increased scale of provision.

3.2.16 Option 2 was considered to be the preferred option for a number of reasons including:

- it addresses the main housing need in Basingstoke Town, but also provides some opportunity for new rural housing provision in the larger settlements (SA objective 1: housing).
- it would be supportive of economic growth within Basingstoke Town and provide support to the rural economy in the other larger settlements (SA 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 (SA objective 14: sustainable prosperous economy).
- development will also be directed to those rural settlements that already have some local services and public transport provision (SA objective 13: sustainable prosperous economy).

3.2.17 Taking into account the conclusions above, as a matter of approach the priority was to see if the additional housing requirement could be accommodated first at Basingstoke town. The council also considered the impact of increases at the other settlements. Following consideration of the council’s evidence base it became clear that the required number of dwellings could be achieved at Basingstoke and therefore there was no need to consider redistributing that growth from the largest and most sustainable settlement in the borough to other places or indeed, moving away from the preferred spatial strategy.

- 3.2.18 The council appraised the suitability of Category One sites in the Basingstoke Town area (not previously allocated) in the first instance. This appraisal, which can be found within appendix 15 (PS/02/16), concludes that the Hounsome Fields site performs better than the remaining available sites and that it should be considered as an additional allocation.
- 3.2.19 Furthermore, it was considered that an increase in numbers to settlements outside of Basingstoke town would be contrary to the spirit of neighbourhood planning, the support for which is a key part of the Submission Local Plan. The council strongly supports neighborhood planning (as explained in the supporting text to policy SS5), which itself seeks to help deliver on stated Local Plan objective F (New homes and infrastructure). Given the progress made on neighbourhood plans at the time that the proposed modifications were being considered, an option which cut across the scale of development identified in policy SS5 for the neighbourhood plan areas would have undermined this Local Plan objective and therefore the council considered it to not be a reasonable alternative. Neighbourhood plans for Bramley, Oakley and Deane, Overton and Whitchurch are all at an advanced stage and all of which are currently planning to deliver the level of development identified for their respective settlement in policy SS5. The neighbourhood plans for Oakley and Deane and Overton have been submitted to the Local Planning Authority and are due to be examined before the end of the year.
- 3.2.20 The plan's current approach to Tadley was also reconsidered at the proposed modification stage. The proximity of the AWE has created a significant constraint on further development in the area and the AWE off-site planning group are not supportive of locating further development in and around the town. Whilst the group have, more recently, shown some limited flexibility in terms of smaller scale developments, particularly in the built up areas of Tadley, reflecting specific site location, their position has not changed with regards to allocation for more significant developments. The position of the AWE off-site planning group therefore remains unchanged in terms of specific housing allocations.
- 3.2.21 The council considers its approach clearly delivers the preferred option for the spatial distribution of housing in the borough which is to focus significant development at Basingstoke Town, but with some distribution to the borough's larger rural settlements of Oakley, Overton, Whitchurch, Kingsclere and Bramley.

Consistency between appendices 13a and 18

3.2.22 Appraisal 13a is a high level assessment of spatial options for the distribution of development around Basingstoke town. Whereas appendix 18 is the appraisal of policies in the emerging Local Plan.

3.2.23 It would be completely expected that there would be differences between the SA of a spatial option and the SA of a policy which allocates a site. The SA of a policy will be appraising the performance of the policy and its criterion against the SA objectives. Where relevant, appendix 18 identifies mitigation, either through the implementation of other specific policies, or possible policy amendments to be considered. Mitigation may have been taken into account in revised wording or through inclusion/revision of another policy.

3.2.24 It is not accepted that appendices 13a and 18 are contradictory.

East of Basingstoke sites

3.2.25 Sites BAS121 (East of Basingstoke), BAS102 (Lodge Farm) and BAS103 (Poors Farm) have been appraised individually but also as a combination of sites. Following the landowners decision to promote BAS121 in two phases, with the first phase of 450 dwellings being in the plan period up to the year 2029, the council appraised options for development of part of the BAS121 site and also a site combination option for part of BAS121 and part of BAS102. The council considered it appraised the reasonable alternatives in a subjective and independent manner.

3.2.26 The council does not accept the suggested inaccuracies in the SA of sites. The SA of sites considered the whole site whilst highlighting potential mitigation measures that may help to overcome site issues/ constraints.