

Examination of the Basingstoke and Deane Local Plan

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Mr Adam Dodgshon
Policy Manager (Planning Policy & Infrastructure)
Basingstoke and Deane District Council

Dear Adam,

Examination of the Basingstoke and Deane Borough Local Plan 2011 – 2029: the Inspector's initial concerns

Further to your submission of the Basingstoke and Deane Borough Local Plan (LP) on 9 October 2014, the Inspector has now received the document and supporting material. From this, and without prejudice to the progress and outcome of the Examination, he has a number of concerns that he wishes to make at this stage, which are set out below. He appreciates that, in the short time he has been able to study the Local Plan documentation, he may have missed some vital information which could answer some of his concerns set out in the table below.

The Framework makes it clear that Local Plans need to meet the full, objectively assessed needs for market and affordable housing in the housing market area. Plans must also deal with what will be delivered; where and when it will be delivered; and how it will be delivered through the Local Plan and any supporting documents - this last point touches on the need for realistic, implementable plans, which are more than just aspirational.

In short, taking all these factors into account, the Inspector is seriously concerned that the Local Plan may not provide a sufficiently robust platform for providing new homes in Basingstoke and Deane or an adequate strategy for delivering that objective. He also has concerns about the deliverability of a number of other aspects of the Local Plan, and key environmental concerns, which he sets out below.

You will appreciate that the initial concerns the Inspector has raised relate to fundamental matters at the heart of the Local Plan. It is because of this, and with the aim of avoiding any unnecessary expense in mind that he has drawn your attention to these issues now. He also points out that these do not necessarily represent the only concerns that he may identify, and he reserves his position for the time being.

The Inspector is requesting that you give full consideration to the content of this letter and the attached table. To progress matters expediently, the Inspector would be grateful if you would provide a response, including any suggestions you may have regarding the way forward by **Friday 28 November 2014**.

The Inspector has asked me to state that he trusts you find the letter to be helpful. It is written in the spirit of assistance and to ensure that the Examination is as efficient as possible.

Yours sincerely,

Katharine

Mrs Katharine Makant
Programme Officer

Basingstoke and Deane Borough Local Plan

Exploratory Items: Initial Issues identified by the Inspector

Ref.	Soundness Issue	Inspector's Comments
1.	Sustainable development	<p>1.1 Is the information in the Sustainability Appraisal (SA) and technical appendices sufficiently robust to justify the location and quantum of major new development in the LP, especially bearing in mind that most of the new development is on greenfield sites?</p> <p>1.2 Although the inclusion of a sustainable development model policy is not required, something in the LP stating its commitment to sustainable development is important.</p>
2.	Housing need and provision	<p>2.1 Regarding the objective assessment of housing need (OAHN), the NPPF - <i>the Framework</i> - makes it clear that local planning authorities, through their Local Plans, need to meet the full OAHN for both market and affordable housing in the Housing Market Area. The submitted LP figure of 748 dwellings per annum (dpa) is some way short of the South East Plan figure for the period to 2026 (945dpa), and sits towards the bottom of the range set out in Table 9 in the Edge Analytics <i>Demographic Analysis and Forecasts</i> [Examination Document H02].</p> <p>2.2 Further specific questions regarding OAHN:</p> <p>(a) How does the LP figure relate to <i>the Framework's</i> aims to boost housing supply and economic growth; and (b) the need for some contingency provision?</p> <p>(c): The Inspector cannot find any clear explanation for the choice of the LP figure, and whether it is 'policy-on' or 'policy-off'; if the figure is 'policy-on', what are the policy constraints that have influenced this figure? And if so, what is the 'policy-off' figure?</p> <p>(d) Has a buffer been factored in, as required by <i>the Framework</i> (paragraph 47 [2]) to ensure choice and competition?</p>

		<p>2.3 The March 2014 Strategic Housing Market Assessment (SHMA) is based on a Basingstoke Housing Market Area (HMA), unlike its predecessors, which comprised a larger area. Has this 'devolution' from the larger HMA arisen as a result of cooperation between local planning authorities, and how are the relationships between the neighbouring areas being taken into account in the LP? (This clearly links to Duty to Cooperate.) For example, have the key functional links between where people live and work changed, and if not, what has changed to justify going it alone? In simple terms, how self-contained is the Borough, and is it appropriate for Basingstoke to be planned in isolation?</p> <p>2.4 Regarding the SHMA and LP housing requirements, whilst there appears to be a loose fit between the range of housing requirements (550-1080 dpa) in the SHMA and Table 9 in the Edge document, again there is no obvious explanation for selecting the LP housing requirement, which is somewhat closer to the lower than the upper figure. This needs to be more transparent.</p> <p>2.5 The Planning Practice Guidance (PPG) sets out some key considerations that determine OAHN, which local planning authorities are expected to factor in, such as cross-boundary migration; market signals, such as house prices and affordability; and assessing the needs for the major house types, including housing the elderly, family housing, student accommodation and housing for people with physical disabilities. Has this work been done, and where can it be seen?</p> <p>2.6 Regarding the need for a housing trajectory, this is necessary to demonstrate the deliverability of the LP. If it is to be found in supporting documentation, it also needs to find its way into the LP itself [PPG paragraph 025].</p> <p>2.7 Is the LP affordable housing target realistic, both in meeting the needs of the Borough and in terms of viability?</p> <p>2.8 Regarding Gypsy and Traveller (GT) Accommodation, Policy CN5 and the explanatory text appear to be silent on GT requirements in terms of numbers of pitches, and</p>
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		<p>relevant evidence needs to be provided. Does it, for example, plan to take on board the GTAA requirement (to 2017) within the LP? What does paragraph 5.37 mean in terms of LP commitment? The Council, however, appears to have gone some way towards meeting the requirements of the Government's <i>Planning Policy for Traveller Sites</i> (2012) through parts of policies SS3.9-11 although specific sites do not appear to be identified on the Proposals Map.</p>
3.	Environment issues	<p>3.1 Regarding environmental impact on strategic sites, the sites covered by policies SS3.7 (Redlands) and SS3.9 (East of Basingstoke) are located close to the Whitmarsh Road Incinerator at Chineham and potential green infrastructure, which are potential issues which might affect the deliverability of these sites for residential development. What is the evidence that the LP is effective in relation to these sites?</p> <p>3.2 How do these housing proposals SS3.7 and SS.9 square with the Council's proposals for Green Infrastructure and the creation of a Biodiversity Project Area in the Loddon River Valley?</p> <p>3.3 Policy EM6 accepts that water quality is currently failing to meet the standards in the Water Framework Directive. The Infrastructure Delivery Plan, however, indicating that funding is in place at the strategic level to implement the necessary waste water treatment at the required standard, is vague as to where the resources will come from in relation to the WWTW improvements at Overton, Whitchurch, Sherfield on Loddon and Oakley. Some clarity is necessary to demonstrate that the LP is deliverable at an environmentally acceptable standard.</p>
4.	Transport issues	<p>4.1 With paragraph 32[3] of <i>the Framework</i> in mind, is the Council satisfied that new development proposals in the LP, will not result in severe residual, cumulative impacts on traffic congestion on key routes, such as the A33?</p>
5.	Deliverability issues and monitoring	<p>5.1 Where is the evidence that aspirational policies, such as SS10 for a new railway station at Chineham, are deliverable within the plan period, or are they unsound in that they sterilise land? Are these policies on the 'right' side of paragraph 154 of <i>the Framework</i>?</p>

6.	Level of detail and presentation	<p>6.1 The LP must include the appropriate level of detail for major development proposals, including strategic housing proposals in the Borough: The 2012 Local Plan Regulations state that the allocation of sites and policies for their development cannot be devolved from a local plan to supplementary planning documents (SPDs). It is also clear that policies such as development management policies, site allocations and policies concerning infrastructure provision cannot be 'hidden' in SPDs. The remit of an SPD, a master plan or a planning brief is limited to any environmental, social, design or economic objectives which are relevant for the attainment of development or the use of land. It is for the LP to set the appropriate level of detail. Any major development sites in the LP, which cover a range of uses and/or significant areas of housing will require inset diagrams and an appropriate amount of detail to cover the 'what', 'where' and 'when' questions [PPG paragraph 002 ID: 12-002-20140306].</p> <p>6.2 The LP also needs to include the appropriate level of detail for the regeneration proposals and particularly for such an important area as Basing View (policy SS8) – again the 'what', 'when' and 'where' questions need to be addressed</p> <p>6.3 The LP needs to have a Key Diagram if at least part of its remit is to be that of a Core Strategy.</p>
7.	Superseded policies	7.1 The LP should include a list of superseded policies.