

## Examination of the Basingstoke and Deane Local Plan

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London Road  
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RG21 4AH

To All Respondents

13<sup>th</sup> November 2014

Dear Respondent,

### **Speaking at Public Hearings and Attendance at Exploratory Meeting**

Further to my letter of 21<sup>st</sup> October concerning the Local Plan Examination, this is just a reminder that **28<sup>th</sup> November** is the deadline for notifying me if you wish to speak at the public hearings (date yet to be advised) or at the Exploratory Meeting at 10.00am on 11<sup>th</sup> December, in the Civic Offices (Deanes Building).

Please note that, whilst it is open to the public to attend as observers, the main purpose of the Exploratory Meeting is for the Inspector to discuss his list of 22 concerns and the Council's written responses with the Council's officers, with a view to establishing whether the Examination should continue and, if so, whether there is a need for any additional work by the Council and what the timescale might be. This discussion is likely to take up the majority of the meeting. Towards the end of the meeting, which is due to finish at 4.00pm, the Inspector may invite respondents to speak in relation to the issues that are causing him concern, if they have asked to do so in advance. However, it is not intended to be a forum for respondents to present evidence or to comment on the Plan. The proper place for this to happen is at the public hearings and respondents will be invited to submit further representations in advance of the hearings, should the Examination proceed to this stage.

If you wish to attend the Exploratory Meeting on 11<sup>th</sup> December but do not wish to speak, it would be very helpful if you would let me know so that I can ensure that enough seats are in place. If you do wish to raise an issue or ask a question, it is essential that you notify me in advance, again by 28<sup>th</sup> November, stating to which of the Inspector's 22 concerns your issue or question relates. The Inspector's list of concerns or 'initial issues', extracted from his letter to the Council of 22<sup>nd</sup> November, is included below, for ease of reference.

Please note that this list will form the basis of the Agenda for the Exploratory Meeting. The Council's written responses will be published on the Examination website after the 28<sup>th</sup> November deadline. Invitations to speak at the meeting will be issued to other participants by the Inspector at his discretion.

Further information about the Inspector's concerns and the aim of the Exploratory Meeting is contained in the Inspector's letters to the Council dated 21<sup>st</sup> and 22<sup>nd</sup> October (references PS/1/01 & 02), copies available to view on the Examination website or from me on request. In addition, a list of useful information sources on Local Plan Examinations in general has been added to the end of the Examination website. In particular, I would draw your attention to Section 8 of the Procedural Practice Guide 2013, which deals with Exploratory Meetings.

If you have any questions about the Examination procedures, please do not hesitate to contact me using the contact details set out at the top of this letter.

Yours sincerely,

Katharine Makant

Mrs Katharine Makant  
Programme Officer

### Exploratory Items: Initial Issues identified by the Inspector

#### For Discussion at Exploratory Meeting on 11<sup>th</sup> December 2014

Ref.	Soundness Issue	Inspector's Comments
1.	Sustainable development	<p>1.1 Is the information in the <b>Sustainability Appraisal (SA)</b> 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 <b>model policy</b> 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 <b>objective assessment of housing need (OAHN)</b>, 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: (a) How does the LP figure relate to <i>the Framework's</i> aims to <b>boost</b></p>

		<p><b>housing supply</b> and <b>economic growth</b>; and (b) the need for some <b>contingency</b> 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 <b>policy constraints</b> that have influenced this figure? And if so, what is the 'policy-off' figure?</p> <p>(d) Has a <b>buffer</b> 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 <b>Strategic Housing Market Assessment</b> (SHMA) is based on a Basingstoke <b>Housing Market Area</b> (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 <b>SHMA and LP housing requirements</b>, 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 <b>cross-boundary migration; market signals</b>, such as house prices and affordability; and assessing the needs for the major <b>house types</b>, 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 <b>housing trajectory</b>, 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 <b>affordable housing</b> target realistic, both in meeting the needs of the Borough and in terms of viability?</p> <p>2.8 Regarding <b>Gypsy and Traveller (GT) Accommodation</b>, Policy CN5 and the explanatory text appear to be silent on GT requirements in terms of numbers of pitches, and 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 <b>environmental impact on strategic sites</b>, the sites covered by policies SS3.7 (Redlands) and SS3.9 (East of</p>

		<p>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 <b>Loddon River Valley</b>?</p> <p>3.3 Policy EM6 accepts that <b>water quality</b> 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 <b>residual, cumulative impacts on traffic congestion</b> on key routes, such as the A33?</p>
5.	Deliverability issues and monitoring	<p>5.1 Where is the evidence that <b>aspirational policies</b>, 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 <b>appropriate level of detail</b> for major development proposals, including <b>strategic housing proposals</b> 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 <b>appropriate level of detail</b> for the <b>regeneration proposals</b> and particularly for such an important area as <b>Basing View</b> (policy SS8) – again the 'what', 'when' and 'where' questions need to be addressed</p> <p>6.3 The LP needs to have a <b>Key Diagram</b> if at least part of its remit is to be that of a Core Strategy.</p>
7.	Superseded policies	<p>7.1 The LP should include a list of superseded policies.</p>