

Basingstoke and Deane Borough Local Plan

Exploratory Items: Responses to the Initial Issues Identified by the Inspector.

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?

The council considers that the [Sustainability Appraisal \(incorporating a Strategic Environmental Assessment\), April 2014 \(SA\)](#) (Examination Document SA02) and technical appendices (Examination Documents SA03-SA05) are sufficiently robust in justifying the development strategy set out in the [Submission Local Plan](#). Through the SA process, a number of potential development options have been tested, including different development levels and distribution strategies, and this process has informed the plan as it has developed. Potential development sites were also assessed in detail through this process, the conclusions of which were fully considered in the selection of allocated sites.

The SA has been subject to external scrutiny on two occasions through its development (Rickie Therival and AMEC) and both have concluded that the SA is fit for purpose and is a sound and robust basis for making decisions in the plan. AMEC completed a review of the Sustainability Appraisal (April 2014) against the requirements of Directive 2001/42/EC1 (the Strategic Environmental Assessment (SEA) Directive) in October 2014 in response to the Inspector's question. Overall, the review found the SA Report to be largely compliant with the requirements of the SEA Directive and clearly sets out the process and conclusions of the SA process. Any updates to be made to the SA are therefore more about the presentation of the assessments rather than the technical appraisals and, as such, whilst aiming to improve clarity, do not change any technical outcomes. The work to carry out these changes should not impact on the examination timetable.

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.

Whilst the commitment to sustainable development is implicit throughout the plan it is acknowledged that this is not explicitly stated. As such, the council accepts that a statement outlining the plan's commitment to sustainable development could be included within the Plan or, if the Inspector considers it to be more suitable, that the model policy could be inserted. Such a change could be made to the spatial strategy section and would constitute a minor change to the Plan.

2.1 Regarding the objective assessment of housing need (OAHN), the NPPF *the Framework* - 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 Demographic Analysis and Forecasts* [Examination Document H02].

In line with the NPPF and NPPG, the Local Plan outlines the borough's future housing requirements based on an objective and comprehensive assessment of the local housing target and housing need for the borough.

With regard to the specific comments on the South East Plan, the council considers that the following points are of relevance:

- The South East Plan has been revoked (25 March 2013) as part of the Government's policy change to empower local authorities to set levels of growth they consider appropriate (subject to conforming with NPPF requirements). The South East Plan therefore no longer has a statutory role to play within the borough.
- The South East Plan was based on a different planning approach involving nationally based growth areas and regional redistribution, rather than any objective assessment of local needs.
- The South East Plan's evidence base is now out of date.
- The levels of housing provision envisaged in the South East Plan would have led to a significant increase in net in-migration to the borough over the plan period. In terms of jobs, the South East Plan was also based on an approach of identifying almost a 1:1 jobs ratio. This approach took little account of population age structure over the plan period and is no longer considered to be a suitable approach particularly given the aging population of the borough.

The justification for selecting a figure of 748dpa is explained in response to the Inspector's question 2.4 and is also set out in Table 2 at paragraph 4.22 and Table 3 at paragraph 4.24 of the [Housing Topic Paper](#) (Examination Document TP01).

2.2 Further specific questions regarding OAHN:

(a) How does the LP figure relate to *the Framework's* aims to boost housing supply and economic growth?

In order to boost significantly the supply of housing in their area Paragraph 47 of the NPPF sets out the steps for each local planning authority to follow. As mentioned

above, the justification for selecting a figure of 748dpa is explained in response to question 2.4. This shows how the council has used the evidence base to both determine and then meet the full objectively assessed needs of the housing market area. The evidence base that informs the OAHN expresses the OAHN as a range. It is entirely legitimate for the council to select a figure within the range, provided this is clearly justified and is not fettered by policy constraints. The answer to question 2.4 confirms this in more detail.

The second step concerns the annual update of supply, and the application of the appropriate buffer to provide choice and competition in the market. The council demonstrates in paragraph 5.33 of the [Housing Topic Paper](#) (Examination Document TP01) that there has not been persistent under delivery and therefore the appropriate buffer is 5%. An up to date position on each of the Local Plan allocations has been provided in Table 1 in answer to question 6.1 below. A trajectory has been provided on page 40 of the Housing Topic Paper (TP01) and will be kept up to date as part of annual monitoring. In the event that a 5 year land supply cannot be demonstrated, the council will actively pursue already identified alternative sites in order to rectify the situation in a timely manner. As mentioned below in answer to part (b) of this question, there is already a significant contingency of sites.

The third step is to identify developable sites for the later years of the plan period. The trajectory shows how the larger sites will be fully on stream in later years, providing a large proportion of delivery in that time period. As set out in the response to 6.1, the commitment for Manydown in particular, and other strategic sites, is already well established. In the case of four of the Local Plan allocations (see response to question 6.1 below) planning permission already exists. This evidence, along with the strategy of bringing forward housing in rural areas through neighbourhood plans means the council can clearly demonstrate the supply of developable sites for the later years.

The fourth step is to illustrate the anticipated delivery through the housing trajectory. This is already included in the [Housing Topic Paper](#) (Examination Document TP01) and the Inspector is seeking its inclusion in the body of the Local Plan.

The final step relates to density. The council does not set out a density policy in the plan and but rather encourages appropriate levels of growth on a site by site basis. Draft Policy EM10 will ensure the delivery of high quality development which efficiently uses land through appropriate housing densities which respond to the local context.

How the Local Plan figure supports economic growth

In line with national policy, the overall approach in the Local Plan (including the housing figure) is to support sustainable economic growth in the borough over the plan period.

Policies SS8, EP1 and EP2 set out the strategy to facilitate such growth. Objective's A), C) and E) of the Local Plan set out in more detail what the plan aims to achieve.

Whilst the Local Plan sets the overall tone and approach, it does not set a specific job target. The plan sets the framework to facilitate economic growth through land-use planning, ensuring that there is adequate and suitable employment land and floorspace to meet business needs. The council's approach is also set out in the [Economic Master Plan](#) (Examination Document ETC08) which encourages job growth in ways other than through land-use planning.

To understand the potential interaction between the housing market and economy, the council has examined whether, in broad terms, the anticipated change in the workforce over time, assuming delivery of the level of housing required based on the demographic projections (748 dwellings pa), is consistent with anticipated levels of employment growth. The council has examined the labour force aspects of anticipated demographic growth and, in accordance with the guidance, compared these with trends in employment growth over recent years. The full detail of this work is contained within the [Housing Topic Paper](#) at paragraphs 4.37 – 4.75 (Examination Document TP01).

Dependent on the periods used to assess past trends, this results in different homes to jobs ratios.

- Over the period 1998-2012 11,915 homes were built at the same time as 643 jobs per annum. This gives a ratio of 0.76 jobs per home.
- During the recessionary period 2009-2012, 4,026 homes were built at the same time as the borough experienced 800 jobs losses.

If the same ratios were applied to the housing figure of 748dpa this would achieve a labour supply that supports the following number of jobs:

- during strong economic growth -1,197 jobs per annum
- during recessionary period – 568 jobs per annum

This is compared to the SHMA demographic forecasting of 406 jobs per annum (which is a ratio of 0.54 jobs per home).

Using the above statistics as a guide, 748 dpa could support between 406 and 1,197 jobs per annum. Historic trends shows that housing growth in the borough has not been a constraint to economic growth and that the number of homes does not, in reality, correlate to the number of jobs created or supported.

(b) the need for some contingency provision?

As outlined in paragraph 4.43 of the [Submission Local Plan](#), it provides a contingency or cushion of over 1,000 units. This is explained in more detail in the Housing Topic Paper Table 11 which is replicated below. This contingency provides the Plan with a suitable level of flexibility to accommodate any non-delivery or delayed delivery of sites over the plan period. The sources of housing supply are identified in the [Strategic Housing Land Availability Assessment \(SHLAA\) version 9](#) and are also set out in paragraphs 5.3 to 5.29 of the [Housing Topic Paper](#) (Examination Document TP01).

Table 11

Total Requirement (2011 to 2029)	13,464
Completions 2011 - 2014	1,527 (531 in 2013/14)
Residual requirement 2014 - 2029	11,937 [13,464 – 1,527]
Supply	13,030
Contingency	1,093

It is considered that the plan takes a realistic and robust approach in this regard, taking non-implementation fully into account. The contingency accounts for approximately 9% of the total homes required over the plan period, with the completions from 2011-2014 deducted (as these have already been delivered). A conservative approach has been taken to each of the components of the land supply in establishing the land supply position, as outlined below and therefore 9% is considered to be a robust contingency in this circumstance and is conservative in best practice terms.

- ‘Sites with planning permission’ in Table 2 of the [Submission Local Plan](#) (page 27) have been assessed against the deliverability and developability tests set out in Footnote 11 of the NPPF. Through this process, 65 units were identified as being unlikely to be delivered and these have been removed from the total (see Appendix C of the Housing Topic Paper)
- Urban /Brownfield opportunities in Table 2 have been discounted by 10% for the years 5-15 to take account of non-delivery – equating to over 120 units
- No large site windfall allowance has been included in the plan.

(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?

The council can confirm that the Local Plan figure is a 'policy-off' figure i.e. it is not constrained by the application of local policies.

The explanation for the choice of the Local Plan figure can be found in paragraphs 4.2-4.75 of the [Housing Topic Paper](#) (Examination Document TP01). This sets out that 748 dpa is based on a demographic modeled scenario (Migled10yrs5yrs80%A). This scenario was used as the basis for the housing figure as it was considered to be based on the most appropriate assumptions meeting local circumstances. Further detail can be found in the council's response to the Inspector's question 2.4.

(d) Has a buffer been factored in, as required by *the Framework* (paragraph 47 [2]) to ensure choice and competition?

A buffer has been factored into the figures as required by paragraph 47 of the NPPF. The [Housing Topic Paper](#) (Examination Document TP01) sets out the borough's land supply position, including the five year land supply position in Table 12 (page 42). This sets out how a 5% buffer is included within the five year requirement (a total of an extra 199 units), to ensure choice and competition in the market for land. As set out in paragraph 5.33 (page 41), it is not considered that there has been a record of persistent under-delivery of housing in the borough and therefore a 5% rather than a 20% figure is considered suitable. As outlined in paragraph 4.43 of the [Submission Local Plan](#), a contingency of 1,080 dwellings is also included within the overall land supply.

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?

The previous 2007 joint SHMA (covering Winchester, East Hampshire, Test Valley and New Forest – Examination Document PS/2/06) was based on a Central Hampshire area defined in regional planning work undertaken by SEERA in 2004. In considering HMAs, the 2007 study found that there was a 'North Hampshire' housing market area associated with the M3/A303 and related rail corridors to London and the South West. The 2007 SHMA examined the extent of the housing market associated with Central/North Hampshire in more detail than was the case in the 2004 SEERA work and established the principle that Basingstoke town (referred to as Basingstoke urban area)

has a localised, self-contained and concentrated housing market with 'a high number of household movements taking place within and across its urban area'. It therefore recognised the borough's high level of self-containment.

When it came to reviewing the SHMA, in line with the most recent national planning policy and guidance, the council considered the definition of the HMA. This included a review of regional evidence, local evidence and studies, property prices and affordable housing and intermediate housing application data. It also included a review of neighbouring authorities' SHMAs. This work is set out in chapter 2 of the [SHMA 2014](#) (Examination Document H01). Whilst the council's review of the HMA continues to recognise the functional links highlighted in the 2007 SHMA, particularly amongst the North Hampshire authorities (namely, Hart District Council, Rushmoor Borough Council and Test Valley Borough Council), it concluded that Basingstoke and Deane is highly self-contained. None of the neighbouring SHMA's have identified HMAs which include Basingstoke and Deane borough although they do also recognise the links from internal migration and travel to work patterns. Therefore on the basis of the level of self-containment and that no neighbouring authorities consider to share a HMA with Basingstoke and Deane borough, the council progressed with a SHMA based on the borough boundary.

We are aware of the work carried out by the Department for Communities and Local Government in 2010 which set out to identify the optimal areas within which planning for housing should be carried out. This was commissioned by the former National Housing and Planning Advisory Unit (NHPAU). In their recent advice note on OAHN, the Planning Advisory Service suggests using this research as a starting point 'in the absence of anything else'.

The council is satisfied that it has more up to date evidence as outlined in the paragraph above. Following completion of this review of the HMA the council has had on-going dialogue with neighbouring authorities' to discuss housing requirements under the Duty to Co-operate agenda, and consider the appropriateness of the proposed HMA. Rushmoor Borough Council, Wokingham Borough Council, Test Valley Borough Council, West Berkshire Council, Hart District Council, and Winchester City Council have each confirmed that they form part of different HMAs to that of Basingstoke and Deane and this is reflected within their own SHMAs. Therefore it is considered justified and based on robust evidence to undertake the SHMA 2014 based on the local housing market of the borough boundary. These authorities have all agreed in writing that the table set out in the Duty to Co-operate statement is factually correct. Copies of this correspondence can be provided as necessary.

It is acknowledged that there remains movement between all neighbouring authorities, London and Basingstoke and Deane and therefore internal migration should be taken

into account in assessing objectively assessed housing needs. The council can confirm that the full internal migration based on the past 10 years trend is accounted for within the Local Plan housing figure of 748 dpa and therefore the borough is not being planned in isolation but rather adequately takes into account links with neighbouring areas and London.

The movement between the borough and London is therefore also addressed. As set out in the London Infrastructure Plan 2050 consultation document, the GLA states on page 66 of that document “the Mayor has concluded that the large reservoirs of brownfield land within the capital will enable London to accommodate its growth at least until 2025 within the existing boundaries”. In addition, there has been no approach to Basingstoke and Deane Borough Council with regards to housing needs, unlike the situation in Bedford, for example. This situation will be monitored through keeping up to date with the outcome of the Inspectors’ Report into the Further Alterations to the London Plan, and relevant discussions will take place as and when necessary under the Duty to Co-operate.

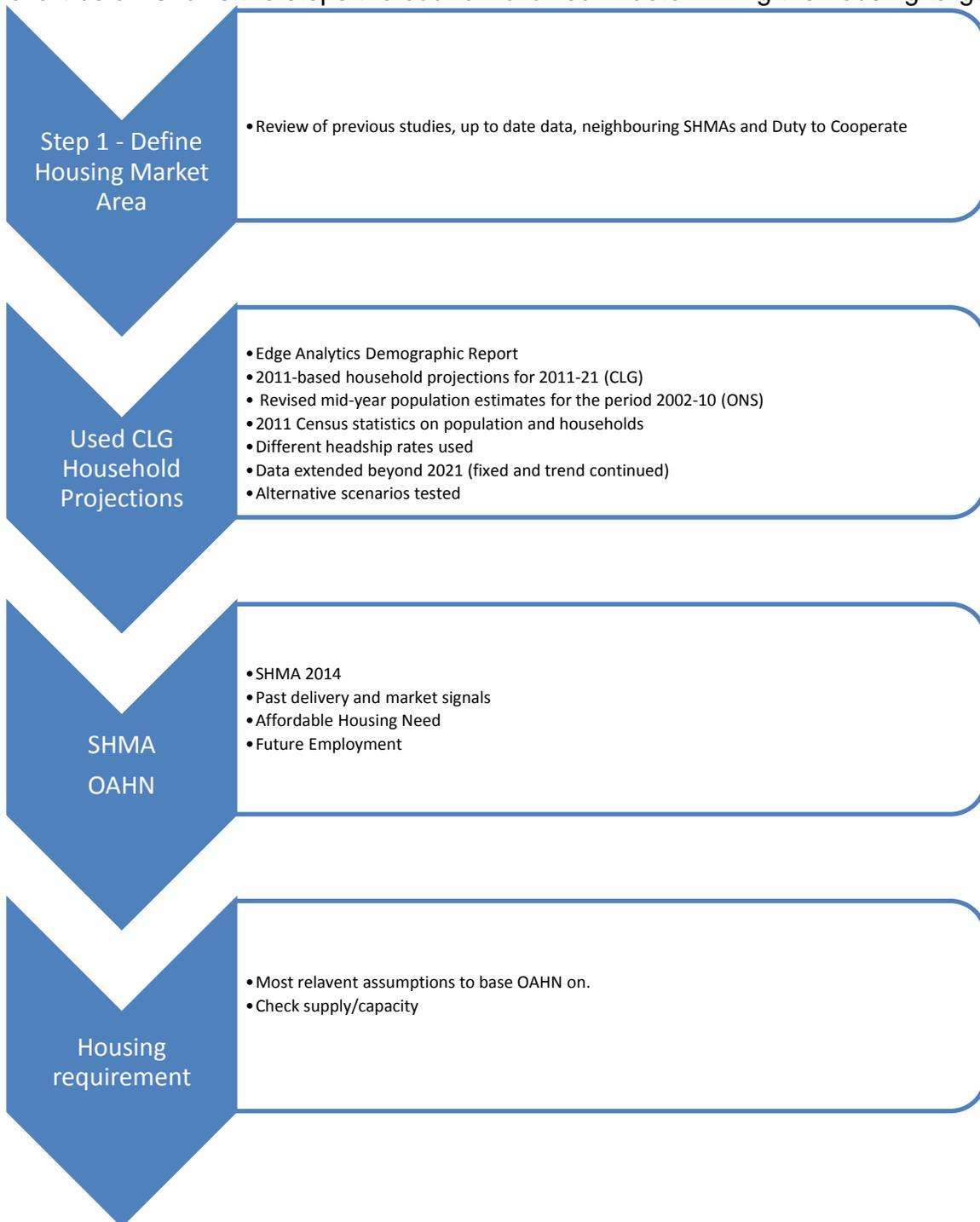
Further evidence which was not available at the time of the SHMA publication is the release of additional Census 2011 data (RF04AEW - Location of where people live when working and place of work). The table below shows the level of self-containment of Basingstoke and Deane Borough compared to neighbouring authorities. The borough’s level of self-containment (58.6%) is significantly higher than neighbouring areas and provides additional support for the self-contained HMA based on the most recent data.

	Usual place of residence									
	Basingstoke and Deane	Bracknell Forest	Guildford	Hart	Rushmoor	Surrey Heath	Test Valley	Waverley	West Berkshire	Wokingham
Local Authority Self Containment	58.6	38.4	45.4	30.3	39.0	31.4	46.3	37.4	54.5	33.9

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.

The [Housing Topic Paper](#) (Examination Document TP01) sets out the justification for the housing strategy contained within the [Submission Local Plan 2011-2029](#), including how the housing figure was determined. How the council moved forward from the identified objectively assessed housing range is set out in paragraphs 4.21 – 4.75. The

chart below shows the steps the council followed in determining the housing target.



The objectively assessed housing range (550-1080dpa) was determined by the modeling of several demographically led growth scenarios which were based on different assumptions. These assumptions are set out in paragraph 4.22 of the Housing Topic Paper.

Consideration was given to the appropriateness of each of the assumptions used in each demographic modelling scenario. Table 2 at Paragraph 4.22 and Table 3 at Paragraph 4.24 of the Housing Topic Paper provides an account of the assumptions considered and the reasons why they were taken forward or rejected.

The housing number of 748 dpa is therefore based on:

- 5 years past trend international migration' - international migration assumptions are based on the last five years of historical evidence. The UK has seen a rise in international migration particularly with the more recent changes enabling easier movement between European countries. Therefore this shorter period for past trend provides what is likely to be experienced in the borough moving forward.
- 10 years past trend internal migration' - internal migration assumptions are based on the last ten years of historical evidence. This time period reflects the typical average housing completions rates for the borough and therefore the levels of internal migration are balanced over this longer period of time providing a more accurate reflection of the levels of internal migration likely to be experienced by the borough in the future.
- '80% of international migration'- international migration assumptions are reduced to 80% in line with the difference between the current national estimate (and 155,000) and the existing ONS long-term assumption (+183,000). This provides an alternative trend projection that considers the potential future impact of in migration if the government's stated intention to bring down net immigration is successful. As such, this approach is considered appropriate to Basingstoke when the level of international in-migration is relatively low.
- CLG 2011-based headship rates, with the 2011-21 trend continued after 2021 - The latest 2011-based rates replace the previous 2008-based household projections. They provide an update on likely household growth trajectories, taking account of the mixed economic conditions that have affected local communities since 2008 and therefore are considered to be robust.

It was also deemed unnecessary to increase the housing requirement as a result of other factors (please see also the council's response to Inspector's question 2.5).

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?

The council can confirm that this work has been done and is contained within the [SHMA 2014](#) (Examination Document H01).

Cross boundary migration has been considered in determining the extent of the Housing Market Area (HMA). This work was undertaken as part of the SHMA 2014 and is outlined in paragraphs 2.24 - 2.28 (of the SHMA). The work included an analysis of the most recent data (ONS 2012) that was available at the time of writing concerning migration between authorities.

Migration is further considered in section 5 of the SHMA which looked at historic trends of both international and internal migration. These historic trends were used to inform the [Edge Analytics Demographic Analysis and Forecasts](#) (Examination Document H02) and a period of 10 years for internal migration has been used in calculating the housing requirement of 748 dpa (as set out in the council's response to the Inspector's question 2.4).

Market signals, in line with the PPG, have also been factored into the SHMA. Detailed analysis of houses prices (to buy and to rent) is set out at paragraphs 4.36 – 4.69. Paragraphs 5.18 – 5.63 of the SHMA 2014 provide a detailed analysis of the comparison between house costs and the ability to pay. This has fed into the Affordable Housing Needs Assessment to calculate the level of affordable housing need which is set out in Appendix C of the SHMA 2014 and the Housing Topic Paper at Appendix A.

The conclusions reached, after market signals were factored in, were as follows:

- Basingstoke and Deane house prices are among the least expensive in Hampshire and the South East
- Over the past ten years, the borough has not experienced any worsening of affordability when compared to neighbouring authorities, indicating no justification for increasing the OAHN range to respond to market signals
- There have been no requests from neighbouring authorities', under the Duty to Co-operate, to accommodate unmet housing needs elsewhere.

In line with paragraph 021 Ref ID 2a of the PPG which states that 'once an overall housing figure has been identified, plan makers will need to break this down by tenure, household type and household size. Plan makers should therefore examine current and future trends ...'. Chapter 10 of the SHMA 2014 considers housing mix, in particular paragraphs 10.37 – 10.47, and also the needs of specific groups. It concludes that:

- the borough faces growth in the number of elderly households and that this will commensurately increase the need for both housing to accommodate such households, as well as potentially residential care solutions. This has been recognised by Local Plan Policy CN4 which deals with specialist accommodation as well as accommodation for the elderly.
- Around 14% of the population has a limiting long term illness which would justify a requirement for higher accessibility standards. This has been recognised in Policy CN3 which requires adaptable housing. It is also addressed by Policy EM10 in relation to design and accessibility/adaptability.
- The borough does not have a particular concentration of ethnic minority groups who would face particular barriers to housing.

There is no reference to student accommodation within the SHMA as the borough contains a nominal number of students, reflecting that fact that there is no university or equivalent within the borough.

The council also considers that it may be useful to view the compliance tables contained within the [Housing Topic Paper](#) (Examination Document TP01) at Appendix A, which set out how the evidence and Local Plan policies meet the requirements of the Framework and PPG and cross refers to the relevant sections of the SHMA 2014.

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].

The borough's housing trajectory for the Local Plan (April 1st 2014) is set out within the [Housing Topic Paper](#) (Examination Document TP01). An updated trajectory is published each year as part of the annual housing monitoring process (see [Examination Document BD02](#) as an example). Given the nature of trajectories, which are superseded on a 6-12 month basis, the council considers that the inclusion of such information would result in the plan quickly becoming outdated and that such an approach is different from that taken to the rest of the plan where the intention has been to future proof the content. However, if the Inspector considers this to be an important change then the trajectory could be included within section 4 of the plan in support of Policy SS4. This would constitute a minor change.

2.7 Is the LP affordable housing target realistic, both in terms of meeting the needs of the Borough and in terms of viability?

The [Submission Local Plan](#) affordable housing target is realistic in meeting the needs of the borough. The [SHMA 2014](#) (Examination Document HO1) includes detailed information regarding housing affordability for owner occupation, private rented and

social housing tenures (see chapter 5, paragraph 5.18 -5.80). This concludes that, based on such indicators as income levels and house prices, a total of 37% of newly forming households in the borough will require some form of affordable housing and this is only expected to worsen with changes in affordability.

The Housing Needs Assessment (HNA) which is set out in Chapter 9 of the SHMA 2014, determines how many households are already in housing need and the level of 'newly arising need'. This is then used to give an estimation of how much affordable housing is required if the needs of these households are to be met in full over the five year assessment period. The HNA goes on to show the extent to which planned housing delivery – homes that are expected to be built in the next five years, will be able to meet this need. The different components of the HNA in relation to current and arising household need can be found in Appendix C of the SHMA 2014.

Following the determination of the Local Plan housing figure of 748 dpa a specific HNA was undertaken, as set out in the [Housing Topic Paper](#), Appendix B (Examination Document TP01). This determines that there is a backlog (households currently in need) of 266 households per annum over a 5 year period and 534 households in newly arising need, that is both newly forming households and existing households which fall into need due to changes in circumstances etc. This equates to a total of 800 households per annum in affordable housing need.

The supply of affordable housing is not only through new build but also relets. The SHMA 2014 and HNA identifies that there are 494 homes made available per annum through re-lets. This leaves a remainder of 306 households in need to be met through new build. This is 41% of the Local Plan housing figure of 748 dpa. A target of 40% is therefore considered appropriate to meet need. In addition, it is important to note that in rural areas "rural exceptions" schemes will also continue to play a role in delivering affordable housing in the borough (see paragraph 6.27 of Examination Document TP01 for details of past completions on rural exception sites). This approach continues to be supported in national policy, with the potential for an element of cross-subsidy which the council has embraced through allowing a proportion of market housing on such schemes to assist with deliverability.

Further information on the affordable housing strategy is set out in Part E (chapter 6) of the [Housing Topic Paper](#) (Examination Document TP01).

In respect of viability, the council commissioned detailed work from consultants 'Three Dragons' to consider the viability of the Local Plan, in tandem with the preparation of the council's approach to the Community Infrastructure Levy (CIL). This included the approach to affordable housing, which informed policy CN1.

The council published the [Residential and Non-Residential Viability Report](#) (Examination Document HO10) in November 2013. This sets out, in paragraph 7 of the Executive Summary, the conclusion that development in the borough could achieve affordable housing provision of 40% for most forms of residential development, tested in conjunction with a meaningful proportion of CIL. Further detail on this is provided in the main body of the report and specifically in section seven, which confirms that, with a target of achieving 40% affordable housing from residential proposals, there is the potential for a maximum theoretical level of CIL of between £55 and £120. The study does, however, note that some forms of development, such as high density flatted schemes in Basingstoke town centre are unlikely to proceed in the current market, even with lower proportions of affordable housing and a CIL rate of £0.

In response to comments received both on the Pre-Submission Local Plan and the Preliminary Draft CIL Charging Schedule, a further viability assessment was undertaken in Spring 2014. The results were published in the [Golf Course and Manydown Viability Study, July 2014](#) (Examination Document HO11). The purpose of this work was to consider a shift in emphasis in the provision of infrastructure from CIL to section 106 for the larger development sites in the borough. The study also considered changes in key inputs into the viability model, such as updated values and costs and additional information on the infrastructure requirements for large sites, as detailed in paragraph 2 of the Executive Summary. Paragraph 3 of the Executive Summary highlights that the Golf Course site (policy SS3.11) is able to provide 40% affordable housing from a viability point of view, with further detail on the findings for this site provided in section 4 of the report. Paragraphs 5 and 6 of the Executive Summary set out the conclusions in respect of Manydown (policy SS3.10), which highlights that this site is not currently viable with the provision of 40% affordable housing and the full package of s106 costs modelled. Section 5 of the report provides further detail on the findings, and sets out options for the council to consider in taking forward CIL and implementing Policy CN1 through the planning application process.

Given the findings of both viability assessments, Policy CN1 has been drafted to establish the approach that the council will take when considering planning proposals. This reflects the overall need identified in the borough through the [SHMA 2014](#) (Examination Document H01) including having regard to the current viability of developments such as land values and other development costs. Where schemes do not meet the requirements of the policy, there is scope for the applicants to submit a site specific viability assessment to justify any departure from the policy requirement. Further detail on this is provided in paragraph 5.8 of the supporting text to Policy CN1, which highlights that the policy represents a starting point for negotiation.

A further consideration is the changing market, which has been taken into account in undertaking the 2014 Viability Assessment and is summarised in paragraph 2 of the

Executive Summary. It is clear that over the course of the plan period, values and costs will continue to vary in response to market conditions and it is considered that the flexibility contained in Policy CN1 provides suitable scope to accommodate this, whilst seeking to address housing need that has been identified in the borough.

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 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 Planning Policy for Traveller Sites (2012) through parts of policies SS3.9-11 although specific sites do not appear to be identified on the Proposals Map.

Policy CN5 of the [Submission Local Plan](#) acts as a development management policy, and therefore focuses on setting out the necessary criteria for providing additional pitches in suitable locations, in line with national policy and guidance as set out in *Planning policy for traveller sites*. Consequently, Policy CN5 is not intended to allocate specific sites on which gypsy and traveller accommodation can be provided. The supporting text of Policy CN5 does make reference to the needs up to 2017 (paragraph 5.41). This need comprises of 7 pitches.

In terms of how the need set out in the [GTAA](#) (Examination Document H08) up to 2017 will be taken on board within the Local Plan, the council's [Topic Paper on Gypsy and Traveller Provision](#) (Examination Document TP04) explains that the 'development management approach' forms the basis for catering for short-term need (please see paragraph 3.7). This will entail providing sites through permitting appropriate planning applications. The approach has proved successful in securing the necessary new pitch provision in the borough, with 4 pitches provided since the GTAA was published in July 2012 (more detail can be found in paragraph 3.3 of TP04). Furthermore, two planning applications for additional pitches are currently under consideration by the Local Planning Authority (please see paragraph 3.5 of TP04 for more details¹).

Therefore, it is considered unnecessary to allocate specific sites to address the short-term need, as the development management approach has been successful in delivering the additional pitches required and will continue to provide for the required short-term need up to 2017. This will be monitored on an annual basis through the council's Authority Monitoring Report.

¹ The Topic Paper makes reference to planning application 14/01713/ROC, which it has now been confirmed would, if permitted, provide for 3 additional pitches.

Paragraph 5.37 sets out the requirement for the council to identify sites to meet the needs of Gypsies, Travellers and Travelling Showpeople and, in addition to the approach outlined above, the Local Plan sets out how the council is committed to meeting needs through pitch provision on sites allocated for residential development (Policies SS3.9, SS3.10 and SS3.11). The areas to be set aside to enable the provision of pitches on each of these sites will be considered through the masterplanning process associated with each of the sites. The council is committed to undertaking an updated GTAA to assess the level of need over the medium to longer term. In the event that additional pitches are required over this longer timescale this can be addressed through the Allocations and Settlement Policy Boundary Review DPD. However, given the low level of need in the borough and the framework provided by the Local Plan, it is not foreseen that this issue will need to be addressed in a future DPD.

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?

The sites covered by Policies SS3.7 (site reference number SOL002) and SS3.9 (site reference number BAS121) are located close to the Integra North Energy Recovery Facility (ERF) (Whitmarsh Road Incinerator) and the Thames Water Chineham Sewage Treatment Works (STW).

The sites have been included as part of the most sustainable strategy when considered against the reasonable alternatives and are considered suitable locations for housing. Pollution and green infrastructure matters were recognised in the site assessment and sustainability appraisal and have been given due consideration through the site assessment process, including within the documents set out below. It is worthy of note that the council's Environmental Health Service (EHS) raised no objection to the potential allocation of these sites.

SS3.9 (BAS121):

- pages 111-126 of [Volume 1 of the Housing Site Assessment](#) (Examination document: H05)
- pages 162-184 of Part 1 of [Appendix 14 of the Local Plan Sustainability Appraisal and Strategic Environmental Assessment](#) (Examination document: SA04).

SS3.7 (SOL002):

- pages 464-477 of [Volume 3 of the Housing Site Assessment](#) (Examination document: H05)
- pages 2-18 of Part 2 of [Appendix 14 of the Local Plan Sustainability Appraisal and Strategic Environmental Assessment](#) (Examination Document: SA04).

Policies SS3.7 and SS3.9 contain specific criteria in light of the nearby ERF and STW to ensure acceptable noise and odour standards can be met across the sites. The noise and odour assessments will be used to inform the joint masterplanning of SS3.7 and SS3.9, in particular the layout decisions.

In addition, the ERF² is subject to the requirements of the Waste Incineration Directive and is regulated under the Pollution Prevention and Control (PPC) regime. The regulator is the Environment Agency (EA) who require such installations to have a permit for operation which contain emission limit values (ELVs) and other conditions. The ELV's are set at a level to protect human health and to minimise environmental impact.

The ERF is also subject to stringent continuous monitoring requirements for stack emissions and also regular monitoring of other pollutants. Continuous monitoring equipment is in service for the operational hours of the ERF. This monitoring information is reported to the EA.

The ERF has been operational since 2003 (when the council's Environmental Health Service raised no objection to the proposal) and has the required permit (BJ77861V). The EA has confirmed that the performance of the ERF has been good over its period of operation. The operator of the ERF, Veolia Environmental Services, produce annual performance reports for the facility (the most recent being for the year 2013) and these can be provided to the Inspector if required. The EA has also confirmed that they have not received any substantiated complaints regarding the ERF.

The annual performance reports provide clear evidence that there is unlikely to be any adverse environmental impact from the emissions from the ERF. The ERF would not be allowed to operate if it caused hazardous levels of pollution and many such plants are located elsewhere in the UK both close to and within urban areas, such as the Lakeside Energy from Waste facility at Colnbrook near Slough and the Integra South East ERF in south Portsmouth.

Consultants on behalf of the landowner (Hampshire County Council (HCC)) for the site covered by SS3.9 have also undertaken a noise impact assessment (2010). This report

² Further information on the ERF can be found on the Veolia website at:
<http://veolia.co.uk/sites/g/files/dvc636/f/assets/documents/2014/09/Chineham.pdf>

accompanied the landowners representation to the Pre Submission Local Plan consultation. The report includes an assessment of the noise arising from adjacent roads and the nearby ERF and includes recommendations to mitigate any potential impacts on the new residential dwellings closest to the ERF.

In addition, consultants on behalf of the landowner for the site covered by SS3.9 have carried out odour assessments (2011 and 2014) in relation to the STW. The 2011 assessment accompanied the landowners representation to the Pre Submission Local Plan consultation and the latest assessment was provided to the council in October 2014. The [Odour Assessment Report](#) (2014) (Examination Document ENV15) provides further clarification of the impact of any odour emissions from the STW and was based on detailed source sampling reflecting recent investment works at the STW. This odour assessment was also undertaken in accordance with the criteria submitted by Thames Water and in close cooperation with them. The assessment concludes that with the recommended mitigation measures in place, the proposed allocation will not be significantly affected by the nearby STW odour emissions and will comply with European and National odour legislation and guidance, as well as Local Plan policy.

Evidence documents completed by the council (H05 and SA04) and the landowner of SS3.9 (noise and odour assessment) confirm that matters such as pollution from the ERF and STW will not impact on the deliverability of these sites. Criteria in SS3.7 and SSS3.9 will ensure that layout decisions on the sites will take into account noise and odour matters from the ERF and STW. The Local Plan is therefore effective in relation to these sites.

The site covered by SS3.9 has been allocated for approximately 450 dwellings. HCC (as landowner) have stated the following in their representation on the Pre Submission Local Plan consultation (see comment ID: 1282 of the [Summary of Responses to Pre Submission Local Plan](#) (Examination Document: CD07)) "...supports the principle of development of East of Basingstoke and has agreed to make land available for approximately 450 dwellings and supporting infrastructure as an initial phase of development during the Plan period to 2029. It acknowledges that the total site has capacity for approximately 900 dwellings, however, the balance would be delivered as a potential later phase beyond the Plan period".

The penultimate sentence of Policy SS3.9 states that the site boundary, as defined on the Policy Maps, has capacity for approximately 900 dwellings. This approach will ensure flexibility in the masterplanning of the 450 dwellings allocated for the site in the Plan period and further adds to the deliverability of the site and effectiveness of the Local Plan.

In conclusion, the sites covered by Policy SS3.7 and SS3.9 are considered to be deliverable³ as they:

- are available now
- offer suitable locations for development now
- are achievable with a realistic prospect that housing will be delivered on the sites within 5 years
- are viable.

Further information on the suitability, availability and achievability of the sites can be found on pages 162-164 (SS3.9) and 192-193 (SS3.7) of appendix 4 of the council's [SHLAA \(version 9\)](#) (Examination Document H04)

The green infrastructure matters are discussed in more detail in the council's response to question 3.2.

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?

Plan 26 within Volume 2 of the [Green Infrastructure Strategy 2013-2029](#) (Examination Document ENV09) defines the Loddon Catchment Biodiversity Opportunity Area (BOA), whilst the Biodiversity Priority Area (BPA) for the River Loddon. Section 6.3.1 of ENV09 states that the purpose of BOAs is to identify areas where there is the most potential for improving biodiversity and subsequently serve as a focus for where conservation effort and resources can have the greatest benefit.

As discussed in section 6.3.2 of ENV09 (pages 55 and 56), to help ensure that significant improvements in local biodiversity are to be achieved, the River Loddon BPA, which is located within the Loddon Catchment BOA, has also been identified.

A small part of the BPA and BOA falls within the housing proposal SS3.9 (East of Basingstoke), following the line of Pettys Brook (a tributary to the River Loddon) and its floodplain, which runs through the site. The BPA and BOA do not fall within the housing proposal SS3.7 (Redlands) but are in relatively close proximity to the site.

The following objectives, as identified in section 6.3.2 (page 57) of ENV09 will be pursued within BPAs:

- protect and manage existing key habitats within each BPA
- when opportunities exist create new habitat to expand and link isolated areas of key habitats

³ As defined in footnote 11 of the NPPF.

- support sustainable land management
- improve public access to the countryside/natural green space within each of the areas where this can be achieved without adversely affecting the natural environment.

One of the key means, as indicated in section 6.3.2 (page 57) of ENV09, to deliver the objectives within the BPAs is through planning policy, to ensure that new development within the borough assists in the delivery of green infrastructure and that larger developments include suitable provision for green infrastructure, including habitat improvements. Paragraph 80 of the council's [Living Landscapes - Basingstoke and Deane Borough Council Natural Environment Strategy \(2014\)](#) (Examination Document ENV12) confirms that planning policy can help to ensure new development assists in the delivery of green infrastructure.

Biodiversity related issues were recognised in the assessment of SS3.9 (site reference BAS121 – East of Basingstoke) and SS3.7 (site reference SOL002 - Redlands) and these have been given due consideration through the site assessment process. This is outlined in the following documents:

SS3.9 (BAS121):

- page 111 of [Volume 1 of the Housing Site Assessment](#) (Examination Document H05)
- pages 161-172 of Part 1 of [Appendix 14 of the Local Plan Sustainability Appraisal and Strategic Environmental Assessment](#) (Examination Document SA04).

SS3.7 (SOL002):

- page 464 of [Volume 3 of the Housing Site Assessment](#) (Examination Document H05)
- pages 5-6 of Part 2 of [Appendix 14 of the Local Plan Sustainability Appraisal and Strategic Environmental Assessment](#) (Examination Document SA04).

Taking into account the objectives that will be pursued within the BPAs and in light of the fact that planning policy is one of the key means to deliver those objectives, criteria j), k) and l) of Policy SS3.9 and criterion d) of Policy SS3.7 of the [Submission Local Plan](#) will ensure biodiversity and green infrastructure matters are considered appropriately when assessing future development proposals on the sites. The criteria take into account ENV09 and ENV12 and will help to ensure the objectives of the BPA will be achieved and may also act as a catalyst to achieve the objectives. The criteria are considered to be effective and will ensure biodiversity and green infrastructure matters are given due consideration in future development proposals on the sites.

The council's [Duty to Cooperate Statement – Regulation 22](#) (Examination Document CD08) on pages 21 and 22 confirms that following further discussions with Natural

England, between July and September 2014, minor amendments were made to Policy SS3.9 criterion l) and SS3.7 criterion d). As indicated in the key/notable outcomes column on page 21 of CD08, Natural England support these policy criteria.

Minor changes (as set out in the [Schedule of Minor Changes](#) (Examination Document CD02), were made to criterion l) of policy SS3.9 to make specific reference to avoiding or mitigating direct and indirect adverse impacts on Pettys Brook and natural flood zones. The criterion adds that this will be achieved through adequate buffering of natural features and habitats. These changes were made to further reflect ENV09 and the council's site assessment and sustainability appraisal of the site (H05 and SA04). Sufficient buffering to the BPA can help to avoid any urban edge effects (such as risk of fires, litter and cat predation) to the BPA.

In addition to Policy SS3.7 and SS3.9 criteria and taking into account that the development plan needs to be read as a whole, development proposals will also need to accord with Policy EM4 (Biodiversity, geodiversity and nature conservation). Paragraph 6.21 of the Revised Pre Submission Local Plan states that the council will actively pursue opportunities for biodiversity improvement within allocated sites and within the BOA's and BPA's. Criterion 4 of policy EM4 (at criterion 4b) requires relevant development to include proportionate measures to contribute, where possible, to a net gain in biodiversity. Criterion 4b) of policy EM4 adds that this can be provided through a focus on identified BOAs and BPAs. As confirmed in the council's Duty to Cooperate Statement (pages 21 and 22), Natural England support Policy EM4.

Finally, Policy criteria in SS3.7 and SS3.9 also require on-site and off-site compensation measures to ensure a net gain in biodiversity. This approach is consistent with paragraphs 7, 109, 114 and 117 of the National Planning Policy Framework.

3.3 Policy EM6 accepts the 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 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.

Paragraphs 33.7 to 33.9 of the [Infrastructure Delivery Plan \(IDP\)](#) (Examination Document CD20) describe the process that the Water and Sewerage Treatment companies go through in respect of funding for new and upgraded infrastructure. This highlights the five year cycle of funding bids to the regulator, OFWAT, made by the utilities to secure new and upgraded infrastructure. Plans for the period 2010 to 2015

were finalised in early 2010 and plans to cover the period 2015 to 2020 are currently subject to the agreement of OFWAT.

Thames Water is responsible for the disposal of waste water in the northern and eastern parts of the borough, including the town of Basingstoke and the villages of Sherfield-on-Loddon and Bramley. Paragraphs 33.7 and 33.8 of the IDP provide further information in respect of Thames Water, and it should be noted that Thames Water submitted their most recent business plan to cover the period 2015 to 2020 in June 2014.

Representations made by Thames Water to the Local Plan do not raise concerns about the ability of their assets to serve new development and in correspondence from Savills on behalf of Thames Water (Examination Document BC/1/02) in respect of specific local infrastructure requirements, dated 26 February 2013, it is stated that:

‘The numbers within the consultation document are of the order previously anticipated by Thames Water and there are currently no known show stoppers to development. Due to the complexities of sewerage systems, Thames Water are unable to determine the exact nature of all the development sites at this time. Upgrades should be anticipated, their exact location and phasing will be determined once certainty about development is absolute’.

More recent correspondence from Thames Water, dated 28 October 2014, states that:

The wastewater / sewerage from both the villages of Bramley and Sherfield-on-Loddon ends up at Sherfield-on-Loddon Sewerage Treatment Works (STW). The STW has been upgraded this Asset Management Plan (AMP) period (AMP5 2010 – 2015) and therefore should have the capacity to cope with this development, however, when more detail is known, we will need to confirm this. I would be surprised if this scale of development triggered a revised effluent consent. Any necessary future STW upgrades would be delivered through Thames Water’s rolling five year business plan period where we fund the infrastructure and the monies are recouped through customers’ bills.

Further, more detailed consideration is being given to this matter through a planning application for 200 homes at Minchens Lane in Bramley (planning application references 14/01075/OUT). Through consultation on this planning application, Thames Water has identified a need for a Grampian style condition to secure a Sewerage Network Impact Study, which the applicant is currently undertaking.

In respect of Southern Water, which covers the part of the borough which includes Oakley, Overton and Whitchurch, paragraph 33.9 of the IDP confirms the approach to be taken in respect of funding and investment in upgraded infrastructure to serve new

development. Southern Water updated and re-submitted their business plan in June 2014, with OFWAT publishing a draft determination in August 2014.

In relation to specific local infrastructure requirements, correspondence with Southern Water (Examination Document BC/1/01) outlines their position in respect of sewerage treatment capacity, which is outlined below:

‘In terms of the timing of additional investment to serve the waste water works at Oakley, Overton and Whitchurch, Southern Water indicated on 3 June 2013 that this ‘need to be determined through the price review process, and will depend on the progress of new development to construction, as well as the level of population growth that actually occurs in the future’.

This correspondence also highlights that the timings should be amended to ‘2015 to 2029’. Correspondence of 28 October 2014 states that:

‘Southern Water treats wastewater arriving at Whitchurch, Oakley and Overton WTWs in accordance with environmental permits set by the Environment Agency. The Agency is responsible for protecting the environment and the permits are set in order to meet water quality objectives. Southern Water has not identified any environmental issues with respect to your Revised Pre-Submission Local Plan. We anticipate that additional new development could be accommodated should this be required.’

More historic correspondence from Southern Water dated 25 November 2011 indicates that:

‘We have not identified any fundamental constraints to prevent the proposed development coming forward. The infrastructure required can be planned and delivered in parallel with development, provided there is good forward planning through adopted development plan documents....The cost of the water and wastewater infrastructure required to serve new development in Basingstoke and Deane is not known at this stage. Furthermore, releasing anticipated costs into the public domain could compromise future competitive tenders. Southern Water is therefore unable to provide cost information.’

4.1 – With paragraph 32(3) of the Framework in mind, is the Council satisfied that the new development proposals in the LP, will not result in severe residual, cumulative impacts on the traffic congestion on key routes, such as the A33?

In preparing the Local Plan, the council has worked closely with HCC as the local highways authority to understand the local transport network, the impact of development on the network and the infrastructure improvements that need to be put in place to accommodate additional demands. Discussions have also been held with the Highways

Agency to ensure that they are content with the approach being taken and which they consider to be acceptable. Through work that has been undertaken by Parsons Brinckerhoff and separately by HCC, the council is content that additional travel demands generated by new development will not result in severe residual, cumulative impacts on key routes in the borough.

Parsons Brinckerhoff were commissioned in early 2013 to undertake a [Transport Assessment \(TA\)](#) (Examination Document TR01) to guide and support the preparation of the Local Plan and to inform decisions on where development should be located.

The TA was first published in August 2013, with further updates provided in September 2013 and May 2014. The assessment has been undertaken using a spreadsheet model which considers traffic flows on the Basingstoke network with a base year of 2012 and three forecasting years (2019, 2024 and 2029), covering both the AM and PM peak periods. Different assumptions were subsequently applied to reflect potential development sites around the town, taking into account background growth in traffic and committed development, alongside the impact of development in neighbouring authority areas. The approach taken is generally in line with the advice set out in National Planning Practice Guidance, in respect of the necessary transport evidence base to inform Local Plan preparation.

The TA has subsequently been used to guide the location of development and to identify and cost potential infrastructure opportunities to mitigate the impact of development at various affected junctions. The junctions considered in detail in the TA were those most likely to be impacted upon by new development and were selected due to the scale of the predicted impact of the Local Plan development and/or to their importance to the strategic and local networks. Junctions where HCC were in the process of undertaking detailed analysis with a view to working up schemes for implementation in the short to medium term were specifically not considered. This includes a number of junctions associated with the A33. HCC have confirmed that:

It is acknowledged that the A33 corridor will be directly affected by traffic growth as a result of development proposed within the Local Plan. However, the Highway Authority are currently progressing schemes to mitigate the anticipated impacts. This work is being undertaken in conjunction with the EM3 LEP to address both the current issues and the forecast growth to 2029. The schemes are all identified within the Strategic Economic Plan with Growth Deal funding subject to the LEP approving the business cases.

In terms of the council's TA (page 16) identified that in all but two cases, Local Plan traffic can be effectively mitigated if the proposed improvement measures are implemented. Such measures have been incorporated into the IDP for future

implementation, albeit, it should be noted that as schemes are brought forward, the detail of the mitigation may vary. In terms of the two exceptions, Brighton Hill Roundabout is forecast to operate with only two arms effectively mitigated in the AM peak hour with both Local Plan traffic and the proposed mitigation in place. However, all of the arms that are not fully mitigated are reported to operate below 110% (i.e. less than 10% above the capacity it was originally designed for). Similarly, the Aldermaston Road Roundabout is forecast to operate with only three out of six arms effectively mitigated in the AM peak hour with both Local Plan traffic and the proposed mitigation in place but all arms will operate below 100% (i.e. below capacity).

It should be noted that the council is working closely with Hampshire County Council to develop funding bids to improve key junctions around the town. In this respect, the Local Transport Body (which forms a key part of the Enterprise M3 LEP) agreed funding bids from HCC for proposed improvements to the A33 corridor (referred to as the North East Corridor to Growth) and the A340 (referred to as the Northern Corridor to Growth), and will be considering proposals for junctions to the South West of the town centre (South West Corridor to Growth) in 2015. These schemes are proposed for delivery over the period 2015/16 to 2017/18 (Examination Document PS/2/03) provides summary details). Since this paper was produced, the government has now issued calls for schemes to come forward in 2015/16, and so a number of these schemes may be brought forward even earlier than indicated above.

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, of are they unsound in that they sterilize land? Are these policies on the 'right' side of paragraph 154 of the Framework?

The plan is considered to be in line with the NPPF and NPPG being aspirational but also realistic. Policy SS10 provides a positive framework and plan-led approach to enabling the delivery of a new station at Chineham, a key infrastructure project for the borough. The provision of such a station has been a long-standing ambition of the borough and county councils, to provide additional connectivity to both the adjacent business parks (Chineham Business Park and Hampshire International Business Park) and new residential development. The project forms part of a package of measures affecting the A33 corridor between Basingstoke and Reading. The commitment to the project is reflected in a number of relevant documents including the borough's [Economic Masterplan](#) (Examination document ETC08) and the county council's [Local Transport Plan](#) (page 50) (Examination Document TR02) which states that the county council 'will work with rail industry partners to support the improvement of the rail network to achieve new rail stations at locations such as Chineham'.

The land for the station, including the car park has been secured, until Autumn 2021, through a S106 agreement linked to the neighbouring residential led development at Taylors Farm/Sherfield Park. The council is also continuing to work with the relevant stakeholders including HCC, Network Rail and the current train operator and, as outlined in the [Submission Local Plan](#) (paragraph 4.78, page 59) the planned electrification of the line is considered to strengthen the case for the station, enabling faster passenger trains to operate and thus increasing capacity for additional railway stations on the Reading to Basingstoke line.

The project has not progressed to date due to a lack of funding (the capital cost of delivering the station is estimated at between £5.4 and £7.8 million, including provision of platforms, footbridge, lighting, CCTV, ticket office, a 120 space car park and bus interchange) and securing the necessary agreement of Network Rail and the relevant train operating companies. However, the continuing ambition to secure the station is reflected in the borough council's recent bid to the LEP for relevant funds. This was not successful on this occasion, reflecting the LEP's emphasis on short-term projects. However, future funding bids will be made as opportunities arise and the council will continue to work with partners to deliver the project which is viewed as key to delivering longer-term benefits to the A33 corridor as a part of a wider package of transport improvements, and ensuring both further investment in the area and on-going prosperity.

It is considered that the removal of this policy will result in a policy vacuum, which will limit the impact on the ability to make reference to the station's allocation in the Local Plan in making funding bids, such as those made to the Local Transport Body. It will also mean that the council will be unable to make such references in commenting on key rail documents, such as Network Rail's Route Utilisation Strategy. Removal of the station's allocation from the Local Plan therefore has the potential to negatively affect its deliverability.

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].

The [Submission Local Plan](#) (Examination Document CD03) is considered to include the appropriate level of detail for major housing development proposals and does not devolve the allocation of sites and policies for their development to supplementary planning documents. Policies SS3.1 to SS3.11 of the [Submission Local Plan](#) allocate the strategic housing site proposals in the borough and the allocations are defined on the [Submission Policy Maps](#) (Examination Document CD04) and the accompanying 10 Inset Maps.

These policies, which are criteria based in nature, set out a detailed basis for where and what development will be delivered. With Policy SS3 they also set out when the sites are likely to be developed through indicating their respective phasing. The policies are considered to set out an appropriate framework for the delivery of the sites over the plan period including their associated infrastructure requirements.

Although the council considers the Local Plan already contains an appropriate amount of the detail, the council is willing to consider producing an Inset Diagram for each strategic housing site allocation if required to do so.

The site policies have been informed by the council’s [Infrastructure Delivery Plan](#) (IDP) (Examination Document CD11) which sets out the framework for infrastructure provision to 2029 and the more detailed infrastructure requirements (and costs) that are needed within the first phases of the Local Plan. It sets out the necessary strategic and local infrastructure to meet the needs that arise from the site allocations. Appendix A of the IDP details the Infrastructure Schedule which sets out the proposed infrastructure to be provided in order to deliver planned growth, by whom and when. The IDP will be reviewed on a regular basis through the life of the Local Plan to accommodate changes to the policies and strategies of service providers and the infrastructure requirements and their costs.

Example of a detailed strategic housing site policy

Policy SS3.10 (Manydown) provides an example in illustrating how the Local Plan, in its current format, includes a suitable amount of detail to cover the ‘what’, ‘where’ and ‘when’ questions.

What?

The policy allocates a 333 hectare site to the west of Basingstoke for a mixed-use development including approximately 3,400 dwellings. Policy SS3.10 includes 21 detailed criteria identifying what is required to ensure a high quality and infrastructure

rich development. Criterion in the policy (such as c), d), f), l) and m)), which have been informed by the council’s IDP, identify specific infrastructure requirements associated with the Manydown site.

Where?

Inset Map 2 (Basingstoke Town Area West) of the Policy Maps defines the boundary of the allocated site and also the remaining Manydown Area in land ownership, within which wider masterplanning will take place. The map also defines the proposed changes to the settlement policy boundary and therefore the extent of new development. In addition, the map also defines the location of the Manydown Country Park. Policy SS3.10 and the Policy Maps provide a practical framework for masterplanning to take place and within which decisions on planning applications can be made with a high degree of predictability.

When?

The last paragraph of Policy SS3.10 identifies that the development will deliver homes and infrastructure in the period 2017/18 to 2028/ 2029. The IDP also identifies the phasing of development and associated infrastructure.

Review of progress made on strategic housing sites

In relation to deliverability, Table 1 below sets out the significant progress made on each of the strategic housing sites covered by policies SS3.1 to SS3.11.

Table 1: Progress on strategic housing sites covered by policies SS3.1 to SS3.11

Site reference	Location	Current status
SS3.1	Swing Swang Lane, Basingstoke	<p>Hampshire County Council (HCC), as landowner, included a concept plan and illustrative draft masterplan within their representation (see respondent ID: 205851) on the Pre Submission Local Plan. Their supporting submission report summarises the technical evidence which also formed part of their representation. The technical evidence, which supports the deliverability of the site includes:</p> <ul style="list-style-type: none"> • Initial transport assessment • Tree survey • Ecology and biodiversity assessments • Noise and vibration assessment • Preliminary drainage strategy • Flood risk assessment

		<ul style="list-style-type: none"> • Geotechnical assessment on ground investigation
SS3.2	Kennel Farm, Basingstoke	Gained planning permission in January 2014.
SS3.3	Razors Farm, Basingstoke	Gained planning permission in September 2014
SS3.4	North of Popley Fields, Basingstoke	Gained planning permission in September 2013.
SS3.5	Overton Hill, Overton	Planning Inquiry scheduled for January 2015 although the council has now withdrawn the main reasons for refusal.
SS3.6	South of Blosswood Lane/ Manor Farm, Whitchurch	Gained planning permission in October 2014
SS3.7	Redlands, adjacent to Basingstoke	<p>As indicated in criteria h) of Policy SS3.7, development of the Redlands site and East of Basingstoke site (Policy SS3.9) will be brought forward in a co-ordinated manner through joint masterplanning. The landowners of the sites are committed to this co-ordinated approach to masterplanning.</p> <p>The site is predominantly owned by one land owner, except for a small area in the south western corner owned by HCC. The principal landowner of the site confirmed in their representation to the Pre Submission Local Plan (see respondent ID: 786112 and comment ID: 557) that:</p> <ul style="list-style-type: none"> • There have been discussions regarding masterplanning of Redlands and the East of Basingstoke sites between the landowners. • The principles of a comprehensive approach to develop the site at Redlands along with the East of Basingstoke site have been agreed with HCC. <p>HCC (as landowner), in their representation (respondent ID: 700350) on the Pre Submission Local Plan (see para 2.2.1 of their supporting submission report) state that the site has been the subject of ongoing discussions with the agent acting for the principal owner with a view to ensuring co-operation</p>

		<p>between the parties in the masterplanning and delivery of the two proposed allocations at Redlands and East of Basingstoke.</p> <p>This site will be subject to masterplanning in line with Appendix 5 (Masterplan and development brief protocol) of the Local Plan.</p>
SS3.8	Upper Cufaude Farm	<p>HCC, as landowner, included a concept plan and illustrative draft masterplan within their representation (see respondent ID: 700350) on the Pre Submission Local Plan. Their supporting submission report summarises the technical evidence which also formed part of their representation. The technical evidence includes:</p> <ul style="list-style-type: none"> • Ecological survey • Landscape and visual appraisal • Transport study • Noise and vibration assessment <p>This site will be subject to masterplanning in line with Appendix 5 (Masterplan and development brief protocol) of the Local Plan.</p>
SS3.9	East of Basingstoke, Basingstoke	<p>HCC, as landowner, included a concept plan and illustrative draft masterplan within their representation (respondent ID: 700350) on the Pre Submission Local Plan. Their supporting submission report summarises the technical evidence which also formed part of their representation. The technical evidence includes:</p> <ul style="list-style-type: none"> • Ecological survey • Landscape and visual survey • Flood risk assessment • CHP/District heating technical study for new developments surrounding Chineham Energy Recovery Facility • Noise impact assessment • Odour Assessment Report 2011 • Odour Assessment Report 2014 (Examination Document ENV15) • Transport Study & Sustainable Transport Strategy <p>As indicated in criteria p) of Policy SS3.9, development of the East and Basingstoke site and Redlands site (policy SS3.7) will be brought forward in a co-ordinated manner through joint masterplanning. As mentioned</p>

		<p>above, there have been discussions regarding masterplanning of Redlands and the East of Basingstoke sites between the landowners</p> <p>This site will be subject to masterplanning in line with Appendix 5 (Masterplan and development brief protocol) of the Local Plan.</p>
SS3.10	Manydown, Basingstoke	<p>The council is fully committed to the delivery of the site. This is shown through:</p> <ul style="list-style-type: none"> • The Basingstoke and Deane Borough Council Plan (2013-2017) (Examination Document OT01) which states (page 2) the following: “Promote the use of Manydown land to deliver much needed high quality homes and facilities of wider borough benefit, while protecting local communities.” • The Council meeting on 12 July 2012 which resolved “that Manydown or parts thereof should be actively promoted for development” in line with the powers that the 999 year lease was purchased under namely section 226 and 227 of the Town & County Planning Act to secure the proper planning of the area in which it is situated. This council resolution, together with the inclusion of the Manydown project in the 2013/17 Council Plan, constitutes the policy framework within which the Manydown Executive Committee has been acting to pursue the council landowner interests. • The creation of the Manydown Executive Committee and Manydown Overview Committee. An update report was received by the Manydown Committee on 1 September 2014 (Examination Document PS/2/05). • Establishment of an internal Manydown Officer Liaison Group. • Work completed to date on promoting and progressing the site and the council’s financial commitment to the process (see below). <p>HCC and Basingstoke and Deane Borough Council, as landowners, included a concept plan and illustrative draft masterplan within their representation (see</p>

		<p>respondent ID: 700350) on the Pre Submission Local Plan. Their supporting submission report summarises the technical evidence which also formed part of their representation. The technical evidence includes:</p> <ul style="list-style-type: none"> • A site capacity and initial options report • Technical Strategies report <p>In response to the consultation on the Revised Pre Submission Local Plan, HCC (as landowner) (see respondent ID: 700350) provided an updated supporting submission report and Technical Strategies report. A draft Manydown Vision (June 2014) was also submitted as part of the county council's representations (see respondent ID: 700350) which sets out the shared vision for development of the land. The vision has been developed in close co-ordination with a separate "technical masterplanning" programme.</p> <p>This site will be subject to masterplanning in line with Appendix 5 (Masterplan and development brief protocol) of the Local Plan.</p>
SS3.11	Basingstoke Golf Course, Basingstoke	<p>The landowner has started initial feasibility and technical studies.</p> <p>This site will be subject to masterplanning in line with Appendix 5 (Masterplan and development brief protocol) of the Local Plan.</p>

As noted in Table 1 above, the strategic housing sites covered by policies SS3.7, SS3.8, SS3.9, SS3.10 and SS3.11 will be subject to masterplanning. There is a considerable amount of technical information for each strategic housing site that has been prepared by the landowners and provided to the council that, when considered in addition to the council's own evidence base, will help inform future masterplanning of the sites. If required the borough council can provide further information on the existing sites that need to be masterplanned.

Policies SS3.1 to SS3.11 fulfill the requirements of the NPPF (including paragraph 157, bullets 1 and 5) in that they provide a comprehensive list of land uses and infrastructure requirements within a defined allocation.

Masterplans

As indicated in Policy SS3 (Greenfield Site Allocations), development on the strategic housing sites is expected to come forward through the preparation of a masterplan or development brief where appropriate. Appendix 5 (Masterplan and development brief protocol) of the [Submission Local Plan](#) sets out the detailed requirements to be satisfied when preparing the masterplans or development briefs for an allocated site. Paragraph 4.4 of appendix 5 identifies the preferred approach for the masterplans.

As stated in paragraph 1.2 of Appendix 5, the protocol provides an overview of the commitments of the council and the developer or landowner to producing a masterplan, or development brief. The masterplanning work will provide additional details to those outlined in the site policies but will not affect the likelihood of the sites coming forward when the council expects them to. The masterplans will also reflect the detailed criteria set out in the appropriate site allocation policy and will help to guide development proposals prior to the submission of a planning application. The masterplans will help applicants make successful applications.

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

It is also considered that the [Submission Local Plan](#) includes an appropriate level of detail for other relevant proposals, in line with the NPPF. In terms of regeneration, Policy SS2 (Regeneration) provides a positive framework for the consideration of all regeneration proposals and is in line with paragraph 154 of the NPPF, being aspirational but realistic. This positive approach to the regeneration of previously developed land supports a key council priority and is in line with the core principles of the NPPF as expressed in bullet point 8 of paragraph 17 (to encourage the effective use of land by reusing land that has been previously developed, provided that it is not of high environmental value). Justification for the policy approach and the figure of 200 units is provided in section 4.4 of the [SHLAA](#) (Examination Document HO4). The SHLAA discusses relevant issues including the nature of the town, the significant amount of housing that has consistently been delivered in the past from regeneration schemes and how this remains a reliable and realistic source of housing in the future. In light of this evidence, and also the fact that the plan does not include a large windfall allowance, the approach to regeneration is considered to be both a deliverable and realistic one.

The [Strategic Approach to Regeneration](#) (Examination Document HO13) identifies three neighbourhoods considered to be priority areas for schemes in light of such factors as tenure, ownership and other ward based characteristics, and this information is reflected in Figure 1 (page 35) of the [Submission Local Plan](#). Assessments have concluded that

200 units are deliverable in these neighbourhoods and a priority of the Council's Community Design and Regeneration Manager for 2014/15 is to work with Sovereign Housing Association to progress the initial assessment work on priority cluster areas into housing developments on the ground.

Policy SS2 supports the delivery of regeneration in these areas whilst also providing a wider framework for regeneration. Given the nature of regeneration schemes it is not possible to identify all such opportunities at this stage in the plan making process and therefore the provision of a positive framework to enable such schemes to come forward within Settlement Policy Boundaries in the future is considered good practice and supplements the approach outlined in the NPPF.

In terms of Basing View, again the policies of the [Submission Local Plan](#) most notably Policy SS8, provide a flexible and positive framework for change. As outlined in response to question 6.1, although the council considers the Local Plan already contains an appropriate amount of the detail, it is willing to consider producing an Inset Diagram for the Basing View site if required to do so. The policy makes it clear what is intended to happen in the business park over a twenty year period (addressing the where, when and what points) and also outlines how this will occur and be delivered. The policy clearly sets out that the primary use of the area will be employment, akin to that of a business park or office hub, with complementary town centre uses, such as retail, hotel(s), residential and leisure, being permitted to support the regeneration of the area.

Inset Map 13 of the [Submission Policy Maps](#) (Examination Document CD04) also sets out which part of the area falls within the town centre boundary where, in line with Policy EP3, town centre uses, other than retail will be permitted. This establishes the principle that non-employment uses will be focused towards the western end of the business park. The supporting text of the policy clarifies that the remainder of the site would be considered as an edge of centre location for all town centre uses other than retail. The [SHLAA \(version 9\)](#) (Examination Document HO4) sets out the scale of residential development likely to be deliverable in the area (namely 300 units) and this is reflected in Table 2 (page 27) of the [Submission Local Plan](#). It is considered that this is a suitable level of detail for a Local Plan, establishing the relevant principles relating to what, when and where but reflecting the need for flexibility in light of the long-term nature of the area's regeneration.

The policy is considered to be deliverable and realistic over the plan period and the landowning arm of the council and its partners have undertaken a significant amount of work to progress the regeneration of the area with notable steps already occurring on the ground. A landowning masterplan for the Basing View area is also well advanced (see [Examination Document ETC03](#) for current public position with an updated

masterplan due in December 2014). Whilst this sets out the landowner's vision and is in part helping to market Basing View to inward investors/occupiers, it does reflect the commitment and deliverability attributed to the regeneration proposals. A future Supplementary Planning Document (SPD) would help to support Policy SS8, and would be prepared in close liaison with relevant stakeholders including residents and businesses. The SPD would add further detail such as social, economic and environment objectives associated with the regeneration of the area and provide further guidance, for example in relation to the quality of development expected, design issues and open space etc.

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.

The council considers that it has submitted a Local Plan rather than a Core Strategy and, in line with paragraph 157 of the NPPF, all of the land use designations are shown on the Submission Policy map. There are no 'broad locations for strategic development' which would need to be specifically identified on a key diagram. However, to aid clarity, a key diagram is included in the set of [Submission Policy Maps \(consolidated version\)](#) (Examination document CD 04). It was also included within the Pre-Submission and Revised Pre-Submission Local Plans and was subject to formal public consultation as a result. This Key Diagram could be included within the text of the Local Plan if required.

7.1 The LP should include a list of superseded policies.

The [Submission Local Plan](#) (Examination Document CD03) contains an appendix 6 (see page 166) which lists all relevant [Adopted Local Plan policies \(1996-2011\)](#) (Examination Document DP01) and outlines whether they have been deleted or superseded by the Submission Local Plan and which policy they are superseded by. This appendix was added following consultation on the Revised Pre Submission Local Plan and is listed in the [Schedule of Minor Changes](#) (Examination Document CD02).