



The Planning Inspectorate

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# **Report to Basingstoke & Deane Borough Council**

by **Mike Fox BA (Hons) Dip TP MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 6<sup>th</sup> April 2016

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO BASINGSTOKE AND DEANE**

**LOCAL PLAN 2011-2029**

Document submitted for examination on 9 October 2014

Examination hearings held between 6 October and 11 November 2015

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## Abbreviations Used in this Report

AA	Appropriate Assessment
AH	Affordable housing
AMR	Annual Monitoring Statement
AONB	Area of Outstanding Natural Beauty
AWE	Atomic Weapons Establishment
B1	Use Class B1 - Business
B8	Use Class B8 – Storage and Distribution
BC	Borough Council
BDBC	Basingstoke and Deane Borough Council
CIL	Community Infrastructure Levy
CSH	Code for Sustainable Homes
DC	District Council
DCLG	Department of Communities and Local Government
dpa	Dwellings per annum
DPD	Development Plan Document
DTC	Duty to Co-operate
EA	Environment Agency
EC	European Commission
ELR	Employment Land Review
EU	European Union
G&T	Gypsies and Travellers
GI	Green Infrastructure
GLA	Greater London Authority
GTNA	Gypsy and Traveller Needs Assessment
HBF	Home Builders' Federation
HCC	Hampshire County Council
HCJ	High Court Judgment
HLS	Housing Land Supply
HLSS	Housing Land Supply Statement
HMA	Housing Market Area
HMWP	Hampshire Minerals and Waste Plan
HNS	Housing Needs Statement
IDP	Infrastructure Delivery Plan
IDS	Infrastructure Delivery Strategy (for South-West Basingstoke)
LDS	Local Development Scheme
LEA	Local Education Authority
LEP	Local Economic Partnership
LHA	Local Highway Authority
LPA	Local Planning Authority
LTP	Local Transport Plan
MM	Main Modification
NE	Natural England
NP	Neighbourhood Plan
OAN	Objectively assessed need
ONR	Office for Nuclear Regulation
PAS	Planning Advisory Service
PDL	Previously developed land
PHE	Public Health England

PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SCG	Statement of Common Ground
SCI	Statement of Community Involvement
SEP	South East Plan
SES	Strategic Employment Site
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SINC	Sites of Importance for Nature Conservation
sm	Square metres
SPA	Special Protection Area (for nature conservation)
STW	Sewage treatment works
SRA	Strategic Regeneration Area
SuDS	Sustainable urban drainage system
SUE	Sustainable Urban Extension
Sustrans	Sustrans is a charity which promotes sustainable journeys
TA	Transport Assessment
TDA	Town Development Act, 1952
<i>The Framework</i>	National Planning Policy Framework (NPPF)
TS	Transport Statement

## Non-Technical Summary

This report concludes that the Basingstoke and Deane Local Plan provides an appropriate basis for the planning of the Borough, providing a number of modifications are made to the Plan. Basingstoke and Deane Borough Council has specifically requested me to recommend any modifications necessary to enable the Plan to be adopted.

All of the recommended modifications were proposed by the Council but where necessary I have amended detailed wording and I have recommended their inclusion after considering the representations from other parties on these issues.

The **main modifications** can be summarised as follows:

- Include new policy of presumption in support of sustainable development;
- Update delivery timescales, inset maps, and housing trajectory;
- Include measures to mitigate the visual impact of the housing allocation at Upper Cufaude Farm on the setting of Vyne House;
- Delete proposed Western Bypass but safeguard future rail crossing;
- Manydown - retain separate identity of Oakley, mitigate impact on Wootton St Lawrence, and restrict allocation south of the railway to 300 dwellings;
- Set up Infrastructure Development Strategy for Manydown and SW Basingstoke;
- Remove development ceilings in Neighbourhood Plans;
- Clarify criteria for development in the countryside;
- Increase range of uses at Basing View, including 300 dwellings;
- Clarify accessibility requirements for older peoples'/specialist housing;
- Include Gypsies and Travellers' pitch requirements and broad locations;
- Transport strategy - facilitate modal shift; at key allocations, establish footpath and cycleway frameworks with links to public rights of way and strategic cycle network and deliver public transport from the outset;
- Clarify role of the Green Infrastructure Strategy;
- Provide nature conservation monitoring requirements;
- Highlight sustainable drainage and increase water efficiency;
- Include national targets on carbon reduction and renewable energy;
- Exclude wind turbines from renewable energy generation policy; and
- Address potential for locating a storage and distribution site.

## Introduction

1. This report contains my assessment of the Basingstoke and Deane Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective; and consistent with national policy.
2. The starting point for the Examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my Examination is the submitted Draft Plan (October 2015) which is the consolidated version including the changes proposed in the document following the Exploratory Meeting held in December 2014; these changes were published for consultation in May 2015. Further proposed changes in the form of main modifications (together with some minor modifications) were published for public consultation in December 2015.
3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report **[MM]**. In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in Appendix 1.
4. The main modifications that are necessary for soundness all relate to matters that were discussed at the Examination Hearings. Following these discussions, the Council prepared a schedule of proposed main modifications and carried out sustainability appraisal and this schedule has been subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report.

## Assessment of Duty to Co-operate (DTC)

5. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation.
6. The Council's Duty to Co-operate (DTC) Statement<sup>1</sup>, its update<sup>2</sup> and its submitted Written Response<sup>3</sup> set out how the Council has addressed the requirements of the DTC in the preparation of the Plan. The strategic, cross-boundary matters that the Council has engaged with include housing, economic growth, transport, infrastructure provision, nuclear safety, retail planning, environmental protection, water related issues and accommodation for the gypsy and traveller (G&T) community.

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<sup>1</sup> Basingstoke and Deane Local Plan (BDLP): Duty to Cooperate Statement – Regulation 22; October 2014 [Examination Document CD 08].

<sup>2</sup> BDLP DTC Update; May 2015 [Examination Document PS/02/24].

<sup>3</sup> Basingstoke and Deane Borough Council (BDBC): Response to Inspector's Key Issues and Discussion Note – Issue 1: Legal Requirements and Duty to Cooperate; September 2015 [Examination Document PS/04/01a].

7. The Council points to a wide measure of agreement that it has reached with relevant stakeholders and states that the cooperation undertaken in the preparation of the Plan is ongoing. Very few issues between the Council and the relevant strategic bodies remained unresolved at the time of the submission of the Plan for Examination.
8. Agreement has now been reached between the Council and Hampshire County Council (HCC), as the local highway authority, regarding improvements to the Five Ways Junction at Kempshott, Basingstoke; this is a key element in the delivery of the Manydown greenfield site allocation for 3,400 dwellings (policy SS3.10). The increase in the Plan's objectively assessed housing need (OAN) from 748 dpa in the submitted Plan to 850 dwellings per annum (dpa) as proposed in the Council's Mid Examination Consultation has led to the withdrawal of objections to the Plan from the neighbouring local authorities of Rushmoor BC, Hart DC, West Berkshire Council and Wokingham DC.
9. The designation of the Housing Market Area (HMA) for the Plan is defined by the administrative area of the Borough of Basingstoke and Deane. This is a change from its inclusion in a significantly larger area in previous years, and was cited as evidence of the failure of DTC to consider housing needs from outside the Borough. However, none of the Borough's neighbouring authorities objected to the redrawing of the HMA's boundary to encompass just Basingstoke and Deane. Criticism is also levelled at the Council for failing to consider taking a proportion of the Greater London Authority's (GLA's) housing need, with the links to London under the 1952 Town Development Act (TDA) quoted; there are also concerns that the needs arising in a number of adjacent authorities have not been considered.
10. The Council's response is that no such request from the GLA was received, although it has engaged with the GLA and other South-East authorities over the housing issues in the capital in recent months. Similarly, none of the neighbouring authorities argued that the Council failed in its DTC with regard to them. In response to the links with London, the TDA is no longer a relevant consideration. There were no representations from the GLA, or other authorities, all of whom had the opportunity to appear at the Examination Hearings, to recommend that Basingstoke and Deane take a proportion of their housing need. This justifies the non-inclusion of any GLA/other authority related figure within the Plan's OAN and is not evidence of failure on the part of this Plan in relation to DTC.
11. Some representations argue that the Plan has not taken into account the economic needs of neighbouring authorities. However, the Plan's initial employment strategy changed following guidance from the Enterprise M3 Local Enterprise Partnership (LEP), and in response to the updated Employment Land Review (ELR) published in February 2013 (as requested by the LEP). Subsequent comments received from the LEP<sup>4</sup> have been generally supportive of the Plan; it includes the following statement: "*Enterprise M3 is satisfied that the emerging Local Plan provides a comprehensive strategy and policy context to allow Basingstoke to continue to play a pivotal role in the economic prosperity of the M3 corridor*". The LEP in a recent letter also stated that it

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<sup>4</sup> Enterprise M3 Local Enterprise Partnership (LEP) response to Mid Examination Modifications; dated 22 June 2015 [Examination Document PS/03/36].

has been "actively involved in the preparation of the (Plan) since its formation"<sup>5</sup>.

12. The Council has also co-operated closely with Network Rail, train operating companies, HCC and the LEP over improvements to the rail network, including the proposed new station for Chineham.
13. On environmental matters, the Council has worked with Hart DC regarding Thames Basin Heaths Special Protection Area (SPA) mitigation and over water supply and sewerage capacity. The Council also co-operated with the Environment Agency (EA) over issues of water quality on the River Loddon which is classified as high quality Chalk River, and on the groundwater quality of sites within the River Test catchment area, as well as in relation to flood risk. The Council also engaged in partnership working with bodies such as Natural England (NE), HCC and Historic England to develop effective planning policies to conserve the natural environment, including the North Wessex Downs Area of Outstanding Natural Beauty (AONB) and the Borough's heritage and archaeological assets.
14. Although I note the concerns expressed in written submissions and at the Hearings, it is important to clarify that DTC does not equate to a 'Duty to Agree'. Overall, I am satisfied from the evidence, both in relation to the nature of the collaboration and from the outcomes, that the Council has engaged constructively, actively and on an on-going basis with its neighbouring authorities, as well as the relevant prescribed bodies, including the LEP, Highways England, NE and the EA, in addressing issues that impact on the Borough and its neighbouring areas as part of the Plan preparation. It has therefore met the duty as set out in section 33A of the 2004 Act.

## **Assessment of Soundness**

### **Background**

15. The Borough of Basingstoke and Deane comprises the town of Basingstoke, together with its attractive rural 'hinterland'. Basingstoke expanded from a small market town in the 1960's of around 16,000 inhabitants to a virtual 'new town' taking in new households under the TDA, many of them from London. At the time of the Examination, the Borough's population was 173,000<sup>6</sup>. Basingstoke, with 60% of the Borough's population, is a regional shopping centre with a relatively buoyant economy and low unemployment rate; commuting to surrounding areas is almost counterbalanced by in-commuting. It has various economic links with its neighbouring local authorities, and other regional centres such as Reading.
16. The Borough is set to continue to grow throughout the plan period. This presents several challenges, including the development of a number of new residential communities on greenfield sites, especially on the periphery of Basingstoke. The growth of housing needs to be achieved in the context of matching economic progress, the conservation of a high quality natural and historic environment, including the AONB, the provision of significant infrastructure to address key transport, water supply and sewerage and

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<sup>5</sup> Letter from Enterprise M3 LEP to BDBC dated 18 August 2015 [Examination Document S/04/01h, Appendix 1].

<sup>6</sup> Referred to in Council's introductory statement at the Examination Hearings.

community based issues, and adjusting to an ageing population, whilst ensuring the high quality regeneration of some of the older areas of the Borough.

## **Main Issues**

17. Taking account of all the representations, written evidence and the discussions that took place at the Examination Hearings, I have identified seven main issues upon which the soundness of the Plan depends.

### **Issue 1 – Does the Plan provide the most appropriate spatial strategy for development in Basingstoke and Deane over the plan period?**

#### *The spatial context*

18. Local Plans should be consistent with the principles and policies in *the Framework* (paragraph 151) and its supporting document, the Planning Practice Guidance (PPG). This includes the presumption in favour of sustainable development, and the modification to encapsulate this in a new policy **[MM1]** accords with national planning policy.
19. The PPG sets clear expectations for Local Plans to set out a vision and a framework for the future development of the area<sup>7</sup>.
20. The spatial strategy for Basingstoke and Deane is to meet its objectively assessed development needs throughout the plan period (2011 to 2029) within its boundaries, with the main emphasis on meeting this need in and around the main town of Basingstoke in order to promote sustainable development. Much of this new development is to be delivered in a number of strategic greenfield allocations, the three largest of which account for about a third of the total housing provision in the Plan.
21. A limited amount of new housing is proposed for most of the remaining small towns and larger villages, whilst there are strong policies to protect the countryside from most forms of development. Additional housing in the villages is to come forward through neighbourhood planning, and there is an emphasis on securing housing in regeneration schemes later in the plan period.

#### *Sustainability Appraisal*

22. The Plan has been prepared with continuous, iterative input from the Sustainability Appraisal (SA)<sup>8</sup>, in accordance with the requirements of paragraph 165 of *the Framework*. The SA has also been undertaken in line with the relevant requirements of EU Directive 2001/42/EC. Further work was commissioned to assess the impact of the main modifications that were proposed in response to my concerns at the Exploratory Meeting, including increasing the housing number from 748 dpa to 850 dpa. A quality assurance

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<sup>7</sup> PPG Ref ID: 12-001-20140306 – *What is the role of a Local Plan?*

<sup>8</sup> Several versions of the SA have been issued, including Non-Technical Summary; April 2014 [Examination Document SA06] and SA (incorporating Strategic Environmental Assessment) Report; May 2015 [Examination Document PS/02/16].

review<sup>9</sup> concluded that there were no non-compliance issues.

23. The SA examined four housing growth options for the Plan – 600 dpa; 750 dpa; 850 dpa; and 1,000 dpa, and concluded that 850 dpa is the most effective option in both meeting the objectively assessed housing need (OAN) and also where the social and economic benefits can be seen to outweigh the environmental impacts, such as the development of greenfield land.
24. The updated SA also limits the number of broad, realistic spatial options from 4 to 3, which are: Option 1 – Basingstoke focus for all development; Option 2 – Basingstoke focus and a spread of development to larger settlements in the Borough; and Option 3 – a spread of development to a greater number of settlements in the Borough, where they have settlement policy boundaries. The previous Option 4 – for a major quantum of development to the west of the Borough of the order of 5,000 dwellings at Manydown - is considered unlikely to be fully developed within the plan period, and as such is no longer considered to be a realistic option.
25. Option 2 is considered to have the fewest potentially negative impacts, and it is selected as the most sustainable broad spatial option for the Plan. This is further refined by assessments of the implications of focusing development in particular quadrants of the town, and the most preferable approach is considered to be a spread of development around Basingstoke rather than a focus on either the north-east/east or west/south-west of the town<sup>10</sup>.
26. I therefore consider that the SA has dealt with the realistic strategic alternatives at the appropriate level of detail, including environmental considerations, for assessing the soundness of a local plan so as to enable a preferred, sustainable choice to be made. It is based on a significant amount of technical information, both in the main documents and in the appendices. A number of more specific criticisms of the SA and the Plan's relationship to the SA were made and I address these below.

### *The strategy*

27. The strategy of the Plan, supported by the SA, addresses the following key considerations: (i) growing and ageing population; (ii) need to provide affordable housing (AH); (iii) regeneration of some older housing and employment areas; (iv) supporting the diverse local economy; (v) need to accommodate traffic and reduce congestion; (vi) improving access to public transport; (vii) improvements to sewerage infrastructure; (viii) protecting, managing and improving water quality; and (ix) addressing the uneven distribution of Green Infrastructure (GI) within the Borough.
28. There are objections to a number of key elements of the strategy. In particular, the amount of new housing is considered to be too high, on the grounds of loss of countryside and environmental impacts, as well as viability and deliverability concerns. A common theme is that the Borough has already taken more than its 'fair share' of housing in recent years and that major new

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<sup>9</sup> Report by Levitt-Therivel Sustainability Consultants: Quality Assurance Review of the Sustainability Appraisal (including Strategic Environmental Assessment) Report of the Updated Basingstoke and Deane Submission Local Plan; April 2015 [Examination Document PS/02/31].

<sup>10</sup> BDBC: Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment) Report, paragraph 5.31 and Appendix 13a; May 2015 [Examination Document PS/02/16].

development should be resisted. However, the quantum of housing proposed, for 850 dpa throughout the plan period, is necessary for the Plan to deliver its OAN which I cover in more detail below.

29. A second focus of objection is the perceived 'overconcentration' of new development in the town of Basingstoke and corresponding 'under-provision' elsewhere in the Borough, particularly in relation to housing need – in short, the Plan is considered to be too Basingstoke focused. The SA supports the focus of development at Basingstoke, but with some distribution to the larger settlements of Oakley, Overton, Whitchurch, Kingsclere and Bramley<sup>11</sup>, and the spatial strategy accords with this preferred option in the SA. The lack of a strategic housing allocation in the Borough's second largest town of Tadley is covered in the section on nuclear installations under Issue 4 below. An emphasis on new housing in smaller villages is ruled out on sustainability grounds, although policy SS6 makes provision for rural exception schemes.
30. The focus of development on Basingstoke is justified because the town is the main population and employment centre and the most sustainable settlement in the Borough and it has the largest concentration of housing needs by a considerable margin. In addition to sites in policy SS3 for housing at the settlements of Overton and Whitchurch, policy SS5 sets a framework for neighbourhood plans (NPs) to meet the needs within some of the settlements.
31. The third area of opposition concerns the distribution of the housing allocations around the edge of Basingstoke, which many consider is overly skewed towards the west and south-west of the town. Most concerns relate to traffic impact and distance from major employment areas in the centre and east of the town as well as for environmental reasons. There is, however, another sizeable number of objectors to the proposed housing to the east and north-east of the town, primarily on environmental grounds, including areas prone to flooding and on nature conservation and landscape grounds. There are also concerns about the traffic impact on the A33 corridor from significant extensions of development to the north-east and east of the town.
32. The preferred spatial option in the SA is for distribution of development around the town, offering more choice and greater integration with the town than the other options, and enabling more development on the least constrained and most sustainable sites<sup>12</sup>. Whilst the main emphasis of the new housing sites is to the west and south-west of the town, the 10 allocations in policy SS3 (7,435 dwellings on greenfield site allocations) which are located in and on the edge of Basingstoke comprise: 1 site within inner Basingstoke (100 dwellings: 1.4%); 3 sites in the south-west of the town (2,060 dwellings: 27.7%); 1 site in the west (3,400 dwellings: 45.7%); 1 site in the north (450 dwellings: 6.1%); 2 sites in the north-east (810 dwellings: 10.9%); and 2 sites in the east (615 dwellings: 8.3%). This distribution broadly follows the SA preferred option.
33. The Plan includes proposals for safer cycle routes for commuting, school trips and other purposes, which together with improved public transport would improve the accessibility of the housing allocations to employment and other facilities. It should also be borne in mind that some of these facilities and

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<sup>11</sup> Ibid, Appendix 15; May 2015.

<sup>12</sup> Ibid: Appendix 13a.

services, e.g. schools, to serve these new housing areas, are planned to be located at these sites, substantially reducing the need to travel.

34. I deal with more specific sustainability, environmental and infrastructure considerations later in my report. A key factor, however, is that potential impact on the water quality of the River Loddon and quality of the natural habitats in the Loddon Valley significantly constrain further development options to the north-east and east of the town.
35. A significant proportion of the recent growth in the town of Basingstoke, until the start of the plan period, has been to the north and north-east of the urban area. From this perspective, the change in emphasis to the south-west and west is no more than counterbalancing the previous growth trend in the town.
36. Several other options for the distribution of development are suggested. They include an emphasis in and around smaller settlements and villages within the Borough, developing on land to the south of Junction 6 on the M3 motorway and promoting a new settlement at Micheldever.
37. A strategy of scattered rural development, even if centred on villages, would not be sustainable in terms of access to employment and facilities such as schools and health care. The Plan supports a limited amount of housing in these areas, and expects the NPs to take the lead, although the NP targets in policy SS5 are relatively modest.
38. Land south of the M3 is affected by significant landscape constraints, whilst the motorway forms a strong physical boundary between the town of Basingstoke to the west and countryside to the east. I agree with the Council that housing allocations at this location would not accord with the preferred strategy and would not be justified for inclusion in the Plan.
39. A new settlement at Micheldever would be located outside the Borough, within the Winchester City Council area. I agree with the Borough Council that it can meet its OAN within the Borough. Moreover, a legal challenge to the Winchester Core Strategy by the promoters of a new town scheme at Micheldever was unsuccessful.

#### *Issue 1 - Conclusion*

40. On the basis of the above information, I conclude that the spatial strategy of the Plan is sound and deliverable; that it is positively planned; and that it accords with national policy.

**Issue 2 – Is the Plan's approach towards the Borough's housing provision in terms of its objectively assessed housing need (OAN), its distribution – including its Greenfield Site Allocations – and delivery, including its five year housing land supply (HLS), sound? Are the needs for particular types of housing, including affordable housing (AH), addressed satisfactorily?**

*The overall approach of Plan towards housing provision*

41. The overall approach of the Plan in addressing its housing requirements is set out in its Housing Needs Statement (HNS)<sup>13</sup>. The HNS considers the Borough's requirements in a series of logical steps:

- Definition of the appropriate Housing Market Area (HMA).
- Reviewing demographic projections for the plan period.
- Reviewing future job requirements and market signals, including affordable housing (AH) need.
- Considering cross-boundary unmet need and other issues that inform the housing target.

42. These steps accord with the guidance in the PPG and the recent technical advice note produced by the Planning Advisory Service (PAS)<sup>14</sup>.

*What is the most appropriate Housing Market Area (HMA) for Basingstoke and Deane?*

43. The geographical starting point for assessing the Plan's housing requirements is its Housing Market Area (HMA); this is the basic 'building block' for assessing its housing needs, in accordance with the requirements in paragraph 47 [1] of *the Framework*. The PPG<sup>15</sup> also contains clear guidance on how HMAs should be selected. It states that an HMA should reflect the key functional linkages between places where people live and work and provides useful guidance on the relevant sources of information which can be used to define HMAs. These cover house prices and rates of change in house prices; household migration and search patterns; and what the PPG terms as 'contextual data', such as travel to work areas.

44. The Council's justification for the Borough of Basingstoke and Deane being defined as a 'stand-alone' HMA is based on the consideration of the above factors in its HNS. The Borough has relatively high levels of self-containment; its household self-containment of 70% for in-migration and 75% for out-migration meets the PPG threshold of 70%, whilst its commuting self-containment for its resident population is 68.9% (adjusted to include Borough residents employed at the neighbouring Atomic Weapons Establishments (AWEs)) and 70.2% for its working population.

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<sup>13</sup> Basingstoke and Deane: Housing Needs Statement (HNS); August 2015 [Examination Document PS2/47].

<sup>14</sup> Planning Advisory Service (PAS): Objectively Assessed Need and Housing Targets Technical Advice Note, Second Edition; July 2015.

<sup>15</sup> PPG Ref. ID: 2a-010-20140306 *What is a housing market area?* And 011 *How can housing market areas be defined?*

45. There are also clear differences in lower quartile and median house prices, compared to neighbouring authorities. These are clearly shown in the annotated map at Figure 7.1 in the Council's Rebuttal Statement<sup>16</sup>. Several respondents questioned the change from the Borough being included within a larger, Central Hampshire HMA, which comprised five local authorities including Basingstoke and Deane<sup>17</sup>. This former HMA covered a large and disparate area, as Figure 7.1 shows, whilst the data that supported the former HMA is now out of date.
46. The 'stand-alone' HMA for the Borough is also supported by its neighbouring local authorities, none of which considers that it has sufficiently strong links to be part of the same HMA. This was established through the DTC process. A view was expressed that the HMA should relate more closely to the LEP's Enterprise M3 area. However, no substantive evidence was submitted to support this view, whilst the LEP did not object to a 'stand-alone' Basingstoke and Deane HMA being the basis for the Plan.
47. Using the key indicators of migration, commuting and house prices, the evidence for the change to a stand-alone HMA is robust. I am therefore satisfied that Basingstoke and Deane is an appropriate HMA to serve as the basis for considering the Borough's housing requirements. Concerns expressed over whether the provision of jobs will be held back are explored in the consideration of the Plan's OAN below.

*Overall need for housing - Does the Plan reflect the most up-to-date and robust assessment of housing need for the Borough?*

*(i) Objectively assessed housing need (OAN) in Submitted Plan*

48. The assessment of the Borough's housing need in the Council's submitted Plan was based on a demographic report commissioned from Edge Analytics, which set out a range of population, household and housing forecasts over the plan period. The report also took into consideration updated economic activity rates and alternative unemployment assumptions<sup>18</sup>. On the basis of this report, the Council opted for a housing requirement, based on an objectively assessed housing need (OAN) of 748 dpa over the plan period.

*(ii) Changes to OAN following the Exploratory Meeting*

49. At the Exploratory Meeting held on 11 December 2014, I expressed concern that the Council's OAN of 748 dpa was in effect a 'skewed' position near the bottom of the range which had been identified in the June 2013 Edge Analytics' report (735-1,084 dpa)<sup>19</sup>. Moreover, the Strategic Housing Market Assessment (SHMA)<sup>20</sup> Update, issued since the Exploratory Meeting, argues

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<sup>16</sup> BDBC: Rebuttal Statement – Issue 3: Spatial Strategy and Housing Need; 2 October 2015 [Examination Document S/02/48c].

<sup>17</sup> DTZ: Central Hampshire and New Forest Strategic Housing Market Assessment – Basingstoke and Dean BC, Winchester CC, New Forest DC, East Hampshire DC, and Test Valley BC; November 2007 [Examination Document PS/02/06].

<sup>18</sup> Edge Analytics: Demographic Analysis & Forecasts including an Addendum on Additional Scenario Analysis; March 2014 [Examination Document H02].

<sup>19</sup> Edge Analytics Report Demographic Analysis and Forecasts; Table 5, page 33; June 2013 [Examination Document H02].

<sup>20</sup> BDBC Strategic Housing Market Assessment (SHMA); Update – May 2015 – Section 9 Conclusion [Examination Document PS/02/17].

persuasively that a figure of 850 dpa is a reasonable indication of the Borough's OAN.

(iii) *Demographic considerations*

50. Following the Exploratory Meeting, the Council commissioned Edge Analytics to update its population, household and housing forecasts for the Borough<sup>21</sup>. This work was based on the DCLG 2012-based household projections, with migration assumptions based on past trends of 10 years for internal migration and 5 years for international migration, which suggest an average annual dwelling requirement of 813 for Basingstoke and Deane, compared with 896 dpa based on the more optimistic 2008 based household projections and 854 dpa based on an average of 2008 and 2011 based projections<sup>22</sup>.

(iv) *Migration*

51. These dwelling requirement forecasts also take on board a number of other key assumptions, including migration. There was some debate as to whether a 5 or 10 year period for looking at past trends in migration was the most appropriate for Basingstoke and Deane. The Council, supported by others, accepted at the Hearings that a 10 year period was a more sustainable and robust base.
52. The forecasts use a 10 year period for both internal and international migration and apply the 2012-based DCLG household representative rates. This indicates a requirement for 834 dpa in the Borough over the plan period. It is accepted that international migration in particular has fluctuated widely over the past few years and this will need to be monitored carefully in any future review of the OAN for the Borough. The relatively high levels of internal migration over the last five years, despite the recession, are not considered to be typical for the Borough and 10 years is considered to be more representative. 10 years is also considered to be a reasonable length of time to take account of fluctuations and economic cycles.

(v) *Jobs-led scenarios*

53. The household forecasts also take account of jobs targets, which were included in the Plan for the first time following the Exploratory Meeting. The three jobs-led scenarios of 450, 600 and 700 new jobs pa were sensitivity tested for assumptions regarding economic activity and a small reduction in the commuting ratio by 5% over the 2014-2029 forecast period. The housing figures were also tested against the job projections undertaken by Oxford Economics and Experian. This is not unreasonable in view of the Borough's commuting ratio from 2001 to 2011.
54. This work shows that 15,300 new homes over the plan period could support in the region of 8,000-12,600 new jobs, although it is accepted that the relationship between jobs and homes is complex. This is underlined by the differences between the three economic forecasts commissioned by the Council. The Experian data indicates a requirement for almost twice as many

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<sup>21</sup> Edge Analytics: Demographic Forecasts; April 2015 (Appendix A to SHMA Update [Examination Document PS/02/17]).

<sup>22</sup> Ibid, Table 5: Dwelling Growth Requirements Comparison.

jobs as the Cambridge Econometrics forecast (Oxford Economics was close to the Cambridge estimate)<sup>23</sup>. The Council explains that it selected the Cambridge model as it appeared better aligned with past job creation rates and current market conditions<sup>24</sup>. (I deal with economic and employment matters in more detail under Issue 3 below.)

(vi) *Market signals*

55. The PPG<sup>25</sup> states that factors such as land prices, house prices, rents, affordability (which I deal with separately below), rate of development and overcrowding, should be taken into account when assessing housing needs. The Council has reviewed these in the Housing Needs Statement (HNS)<sup>26</sup>. This document shows in some detail that none of the market signals provide any evidence that housing demand has been constrained by supply, and that in relation to a number of indicators (e.g. overcrowding, affordability, rent rises, house price increase and housing delivery), the Borough has shown itself to be more resilient to the effects of the recession than the England average and several neighbouring authorities. Overcrowding for example, is considerably less than in the neighbouring authorities of Rushmoor, Winchester and Test Valley.
56. Although the view was expressed that the Borough's locational advantages on the M3, between Southampton and London, should point to the need for even higher housing requirements in the Plan, I consider that in accordance with the PPG<sup>27</sup>, where there has not been a worsening of housing market trends, there is no need to make an upward adjustment to the planned housing number for the Plan.

(vii) *Housing affordability*

57. The Council considers housing affordability as a factor in determining its OAN for the Borough, based on the input from the SHMA<sup>28</sup>. The OAN takes into account the requirement for 34.8% affordable housing (AH), but there is no specific uplift to the OAN to accommodate AH in the Borough. The Council's reasons for its stance include the following assertion, in its written response to one of my questions: "*Neither affordability or any of the other market signals indicate that the housing market has been constrained or demand was suppressed over the demographic reference period, so this would not justify an upward adjustment of the planned housing number*"<sup>29</sup>.
58. Concern was expressed that the OAN does not include an uplift to take account of two considerations in particular<sup>30</sup>: firstly, the increased ratio of lower quartile house prices to lower quartile earnings, which rose from 4.04 in 1997 to 7.71 in 2013; and secondly, the exclusion of single people aged 34

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<sup>23</sup> BDBC: Employment Land Review (ELR) Update; May 2015 [Examination Document PS/02/23].

<sup>24</sup> BDBC Rebuttal Statement – Issue 3: Spatial Strategy and Housing Need, paragraphs 4.5.8-4.5.12; October 2015 [Examination Document PS/04/48c].

<sup>25</sup> PPG Ref ID: 2a-019-20150306 *How should market signals be taken into account?*

<sup>26</sup> BDBC: Housing Needs Statement (HNS): Chapter 4 [Examination Document PS/02/47].

<sup>27</sup> PPG Ref. ID: 2a-019-20140306 *How should plan makers respond to market signals?*

<sup>28</sup> BDBC: Strategic Housing Market Assessment (SHMA) Update – see Section 9 (Conclusion) and in particular paragraph 9.8; May 2015 [Examination Document PS/02/47].

<sup>29</sup> BDBC Rebuttal Statement-Issue 3: Spatial Strategy and Housing Need-Answer to Supplementary Question 4.6.1, page 21; 2 October 2015 [Examination Document PS/04/48c].

<sup>30</sup> See MF07 Inspector's Note on Objective Assessment of Housing Need (OAN) [Examination Document PS/05/MF07].

and under from the 'other households in housing need' in the Housing Needs Statement (HNS)<sup>31</sup>.

59. The HNS, however, shows that the greatest changes in the affordability ratio took place prior to the plan period, i.e. from 1997 to 2006. Thereafter, there has been no significant worsening, with the ratio actually dipping in some years<sup>32</sup>. Also, the HNS demonstrates that the affordability ratio in Basingstoke and Deane has not worsened in relation to neighbouring local authorities or regional or national trends<sup>33</sup>, which is viewed as a material consideration in the PPG<sup>34</sup>. These two factors suggest that there has not been a significant undersupply in new housing. Moreover, the cost of borrowing has significantly reduced since 1997 and in particular since 2008. This is easing the cost of mortgage repayments and accessibility to home ownership, which is a relevant factor when considering the need for uplift.
60. Regarding the exclusion of single people aged 34 and under from the Borough's housing needs assessment, the Council recalculated its data, firstly by including these households, which increased the requirement from the SHMA assessment of 318 dwellings, to 357; but its subsequent calculation, based on the Council's new housing allocations policy (dated October 2015), reduces the annual AH requirement to 296<sup>35</sup>. The new housing register is not expected to reach the former levels through changes to the eligibility criteria, although the Council accepted at the Hearings that this will be under review while the figures settle down.
61. Based on the Council's recent work and considering the representations, I am not persuaded that a robust case is made to increase the OAN by adding a AH uplift. The requirement for 296 AH pa is equivalent to 34.8% of the proposed housing target in the Plan. Even if the revision of the housing needs register leads to an increased figure, there is clearly some headroom for this to be accommodated within the requirement for 40% AH, as set out in policy CN1.

*(viii) The OAN for Basingstoke and Deane - Conclusion*

62. The Council has reconsidered its OAN in the light of the issues which were raised before and during the Exploratory Meeting. I have considered the Council's evidence as well as the representations both in support of increased housing provision as well as those who consider the OAN is too high for the Borough.
63. I am satisfied, for the reasons stated, that the OAN, which is reflected in the Plan's housing requirement of 850 dpa, as revised and submitted for Examination, is based on the most up-to-date demographic analysis and forecasts. The figure falls within the main range of projected dwelling requirements in the Edge Analytics report, as tested against demographic assumptions based on headship rates and migration. Full account has also been taken of both the economic considerations including likely job growth,

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<sup>31</sup> Housing Needs Statement (HNS): Table 3.1 [Examination Document PS/02/47].

<sup>32</sup> See MF08: Council's Response to Inspector's Note on OAN, Figure 2 [Examination Document PS/05/MF08].

<sup>33</sup> HNS: See Figure 4.6, page22, showing the relationship between lower quartile housing prices to lower quartile earnings – Basingstoke is significantly more affordable than most of its neighbours [Examination Document PS/02/47].

<sup>34</sup> PPG Ref ID: 02a-019-20140306 *How should market signals be taken into account?*

<sup>35</sup> MF08: Council's Response to Inspector's Note on OAN, Figure 3 [Examination Document PS/05/MF08].

commuting levels, and economic activity and unemployment rates; and market signals to ensure that the housing requirement is likely to secure an acceptable provision of AH.

64. I am also satisfied, both from consideration of the SA and for other planning reasons that I cover later in this report, that the housing requirement of the Plan, based on the OAN, can be delivered without unacceptable environmental impacts, for example on the quality of the landscape and Chalk Rivers, and on the ability of the physical and social infrastructure to handle the pressures in a satisfactory way.

#### *Housing supply and delivery*

65. This section considers firstly, whether the Plan makes sufficient provision for housing over the plan period as a whole, and then whether it can deliver a 5 year housing land supply (HLS) on deliverable and available sites in accordance with the requirements of footnote 11 of *the Framework*.

##### *(i) The supply and delivery of housing over the plan period*

- (a) Can the housing provision in the Plan effectively meet the Borough's needs over the plan period?*

66. The Plan sets out the principal components of the provision of the required 15,300 dwellings over the plan period, and these can be seen in Table 1 below. There is roughly a 50/50 split between allocated sites and reliance on completions of existing planning permissions, commitments and windfalls.
67. The Council's Updated Housing Land Supply Statement (HLSS)<sup>36</sup> provides details of the various components of the Borough's HLS from 2011 to 2029, based on the data as at April 2015.

##### *(ai) Unallocated sites*

68. The Council's estimate for the future supply of unallocated sites divides the total of 6,741 dwellings into sites with planning permission (4,668 dwellings); small site windfalls (550); urban/brownfield opportunities (un-allocated sites) (1,323); and a separate regeneration total (200). The Council's evidence points to an excellent track record in predicted completions, which stands at 99% over the period from 2010/11 to 2014/15 (2,725 completions predicted for the following year, as against 2,756 actual completions)<sup>37</sup>. The Council also points out that its predicted completions figure over the plan period is the outcome of a partnership process with HCC.
69. There are concerns that no allowance has been made in the Council's estimates for non-implementation. In response, I consider it is reasonable to assume that over the rest of the plan period (14 years), sites with planning permission would be implemented in full. Moreover, footnote 11 of *the Framework* explains that sites with planning permission should be considered deliverable – over a 5 year period - unless evidence points the other way. The Council also explains that a discounting process has already taken place in

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<sup>36</sup> BDBC: Updated Housing Land Supply Statement (HLS); August 2015 [Examination Document PS/02/43].

<sup>37</sup> Ibid Figure (iii), page 4.

relation to all its committed sites. Windfalls revisited from the previous plan, for example, have been discounted by 37%. The Council's Housing Supply Schedule<sup>38</sup> sets out in some detail both the proposed phasing and detailed site notes for each scheme with planning permission.

70. Regarding comments that the Plan shows an over-reliance on previously development land (PDL) sites, the strategic housing land availability assessment (SHLAA) makes it clear that all sites, whether PDL or greenfield, have been subject to site suitability tests<sup>39</sup>. I am not persuaded from the evidence that the Plan is unduly biased towards PDL sites.
71. Taking all of this information into account, I am satisfied that the housing supply in the Plan which is to come forward on non-allocated sites is likely to do so on the sites and in the numbers envisaged in the Council's evidence.

*(a) Allocated sites*

72. Turning to the other half of the Council's housing land supply, based on sites allocated in the Plan, concern is expressed from sections of the house building industry over the perceived over-reliance of the Plan on its large allocations. These concerns are based on viability, length of delivery, and the risk that infrastructure would not be forthcoming to enable a start to be made within the scheduled programme. There was also some debate over what is considered to be a large housing site.
73. In relation to scheme delivery, I was referred to two recent reports, one of which showed that the lead time for large schemes (over 500 dwellings) is 8 years from preparation of an outline application to scheme delivery<sup>40</sup>. The two examples in this report which are located in Basingstoke and Deane, however (schemes at Park Prewett and Sherfield Park), date back to outline applications granted in 1997 and 2005 respectively, clearly predating the current development plans regime and the high national priority given to house building in *the Framework*. The second report<sup>41</sup> refers to 78 sites of over 500 units, and states that the median time period for commencement on the first stage of housing delivery is likely to be in the fifth year following the submission of the outline application.
74. Whilst I do not have any reason to believe that these studies have not been objectively prepared, I have to weigh these findings against the evidence submitted by the Council and their viability consultants, and by the developers and their agents who have been involved in the detailed preparation of the schemes which are proposed for implementation on the major site allocations within the Plan. The Council points to considerable progress having been made with developers in progressing these sites, including joint working in scheme preparation; outline planning permissions being granted already on several of the policy SS3 allocations; and a number of Statements of Common Ground (SCGs) which demonstrate the commitment by landowners and

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<sup>38</sup> Ibid Appendix 1- Housing Supply Schedule (April 2015).

<sup>39</sup> SHLAA, in particular see assessing 'suitability' paragraphs 1.8.1 and 1.8.2; August 2015 [Examination Document PS/02/44].

<sup>40</sup> Hourigan Connolly: A Report into the Delivery of Urban Extensions on behalf of Gladman Developments Ltd; February 2014 (Appendix E to Gladman Development's Issue 4 Hearing Statement) [Examination Document PS/04/18d].

<sup>41</sup> Savills: Report to Barratt Homes: Urban Extensions – Assessment of Delivery Rates; 31 October 2014 (Appendix F to Gladman Development's Issue 4 Hearing Statement) [Examination Document PS/04/18d].

developers to deliver in line with the housing trajectory in the Plan<sup>42</sup>.

75. In fact, 9 of the 12 greenfield site allocations proposed in policy SS3 range from 100 to 450 homes (totalling 2,590 homes), thereby reducing the total of dwellings on 'large sites' to 5,150 units, i.e. around one third of the Plan total. I therefore consider that the Plan is partially but not over-reliant on large sites, and that this does not impact on the soundness of the Plan.
76. The Council commissioned three viability reports. One is a 'high-level' local plan viability assessment<sup>43</sup> along the lines of the Harman Report<sup>44</sup>. The other two reports, on Manydown and the Golf Course sites<sup>45</sup> and on the Golf Course (updated) and Hounsme Fields<sup>46</sup>, focus on the largest of the strategic sites. These studies demonstrate that most forms of developments which are provided for in the Plan would be viable, and also could support a Community Infrastructure Levy (CIL) charge to support the provision of infrastructure.
77. Three viability concerns are identified in these studies – high density flatted schemes in Basingstoke town centre; sheltered housing; and the proposed greenfield allocation at Manydown (policy SS3.10). Manydown is not considered to be viable at 40% AH provision and with the full package of planning obligations and Section 106 costs modelled. The study states that the flexibility in AH policy CN1 is noted, i.e. it allows viability to be considered as part of the planning process and that it is open to the owners (the Council and HCC are joint landowners of a 999 year lease on the land) to accept a lower land value than the benchmark used to provide both 40% AH and the full range of planning obligations modelled.
78. The findings of these independent viability studies which were not robustly challenged, demonstrate that there is a reasonable prospect of scheme delivery in accordance with the housing trajectory in the Plan.

*(b) Whether there is a need for additional sites to be included in the Plan*

79. Several additional housing sites were submitted for consideration at the Examination, and I deal with them in more detail in the 'omitted sites' section below. My overall response is that, firstly, I do not consider they are necessary to achieve the housing requirement of the Plan; and secondly, I am not persuaded that these sites would be able to deliver housing within the next few years at a faster rate than the sites included in the Plan. I come to this view in the knowledge that a significant proportion of the Borough's housing requirement over the plan period is to be provided on smaller sites or sites with planning permission, as I have already stated.

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<sup>42</sup> SCGs between BDBC, HCC and relevant landowners, all dated August 2015, in relation to: policy SS3.9 (East of Basingstoke); SS3.7 (Redlands); SS3.8 (Upper Cufaude Farm); SS3.10 (Manydown); SS3.11 (Golf Course); and SS3.12 (Hounsme Fields ) [Examination Documents PS/02/40; 41; 42; 48; 49; and 50 respectively].

<sup>43</sup> Three Dragons: Basingstoke and Deane Residential and Non-Residential Viability Final Report; November 2013 [Examination Document HO10].

<sup>44</sup> Viability Testing Local Plans (the Harman Report); June 2012.

<sup>45</sup> Three Dragons: Manydown and Golf Course Viability Report; July 2014 [Examination Document H11].

<sup>46</sup> Three Dragons: Golf and Hounsme Fields Viability Report; May 2015 [Examination Document PS/02/21].

*(c) Monitoring and review of housing land provision*

80. Policy SS4 reflects the Council's commitment to ensure a rolling 5 year HLS throughout the plan period, and the policy states that this would trigger the need for a review if the housing supply is not sustained. Although some representations argue for a specific policy covering a review of housing land provision, I am satisfied that policy SS4 is justified and effective in addressing the essential requirement for a review, should this be considered necessary.

*(d) Overall housing supply - conclusion*

81. Based on the above considerations, I am satisfied that the housing provision in the Plan is sufficient to meet the Borough's requirement within the plan period on an appropriate range of deliverable sites, and that the Plan is therefore both justified and effective in this respect. The Borough's housing supply is summarised in the table below, which is taken from the Council's evidence<sup>47</sup>.

*Table 1: Components of Housing Land Supply 2011-2029 as at April 2015.*

<b>Number of homes to be built: 850 x 18 years</b>	<b>15,300</b>
Homes Built (completions) in 2011-2014	1,951 (13%)
Commitments (sites with planning permission)	4,668 (31%)
Urban/brownfield (SHLAA sites and allocations)	1,323 (9%)
Regeneration schemes	200 (1%)
Neighbourhood Plans (net, to avoid double counting planning permissions)	666 (4%)
Greenfield allocations	6,300 (41%)

- (ii) Can the Plan deliver the appropriate level of housing to meet the Borough's requirements for the first five years?*

*(a) The national planning policy requirement, including the additional housing delivery buffer*

82. Paragraph 47 [2] of *the Framework* states that in order to boost housing supply, local planning authorities should identify a supply of specific, deliverable sites sufficient to provide five years' worth of housing against their housing requirements, with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. The paragraph also states that where there has been a persistent record of under-delivery, local planning authorities should increase the buffer to 20%.
83. The Council considers that, following the adoption of the Plan, it could demonstrate a 5.3 years' HLS in accordance with the requirements of *the Framework*, which is set out in Table 2 below. However, several house

<sup>47</sup> BDBC Rebuttal Statement – Issue 3: Spatial Strategy and Housing Need, Table 12.1, pages 31/32; 2 October 2015 [Examination Document PS/04/48c].

builders and their agents expressed doubt that the Council could achieve this. In response to these representations and following my request, a SCG between the Council and four other parties<sup>48</sup> (the invitation was open to all parties) helpfully provided calculations on the basis of the Council's OAN of 850 dpa. These respondents also provided data based on their alternative OAN estimates, ranging from 936 to 1,100 dpa.

84. The main areas of disagreement between the Council and some (but not all) of those representing house builders were the length of the historical period which was appropriate to assess the Council's performance; the appropriate target benchmarks over this period; whether the Plan has an over-reliance on large sites; and whether there was persistent under-delivery, to determine whether a 5% of 20% buffer was appropriate for Basingstoke and Deane. The final area of disagreement is whether the Council should apportion making up the shortfall to the first 5 years or spread it out evenly over the plan period. I deal with each of these matters in turn.

*(i) The length of the historical period*

85. The Council opts for assessing its performance over the 10 year period 2005/06 - 2014/15. Some representations consider that the last 5 years are more up-to-date and relevant. I consider 10 years to be a reasonable period to assess a full housing market cycle rather than 5 years which could be skewed by short-term trends, for example as a result of the recent recession. I therefore agree with the Council that the appropriate period for assessing whether there has been persistent under-delivery should be 10 years.

*(ii) The appropriate target benchmarks*

86. The Council uses the following documents which it considers are the correct benchmarks to measure housing delivery over this period: Hampshire County Structure Plan (2005/06); the Draft South East Plan (SEP) (2007/08 - 2008/09); the adopted SEP (2009/10-2010/11); over the period 2012/13-2014/15 there is a series of locally generated targets in the absence of a SEP, including the submitted Plan OAN and then the revised OAN following the Exploratory Meeting.
87. There are disagreements in the SCG over whether the adopted SEP total should be applied retrospectively to the years when the Draft SEP was the target figure, and in later years, over the range of OAN calculations which the Council has used. I am satisfied that when the Draft SEP figure was the only SEP figure, that it is reasonable to use it. In the absence of an agreed regional figure, the appropriate benchmark becomes more difficult to determine. However, the Council's figures have increased progressively since 2011/12 in the light of its demographic work, and it can be robustly argued that the yardstick figures provided are supported by adopted Council resolutions in the absence of any statutory direction at this time. I am therefore prepared to accept the Council's data as the most appropriate benchmarks over the 10 year period.

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<sup>48</sup> Statement of Common Ground (SCG) between BDBC, Savills, Nexus Planning, Woolf Bond and Gladman Developments; 6 October 2015 [Examination Document PS/04/50].

*(iii) Whether there is over-reliance on large sites*

88. I have covered this matter above and my conclusion is that the Plan has a partial reliance on large sites, but that there are sound and sustainable reasons to show that this is a sound approach.

*(iv) Whether there has been persistent under-delivery of housing*

89. The Council's updated HLS figures show that over the period 2005/06 – 2014/15, it has delivered 8,354 dwellings against a requirement of 7,650 dwellings, based on multiplying 850 dpa times the number of years since 2005/06. This compares favourably with five out of the seven local planning authorities with which Basingstoke and Deane shares a common boundary<sup>49</sup>.

90. Moreover, the drop in completion levels over the last few years as a result of the economic downturn (with the exception of 2014/15 when completions picked up across parts of Hampshire) is similar to that experienced both nationally and across Hampshire. On the basis of the Council's calculations above, as well as in comparison with local, county wide and national trends, it is my view that there has not been persistent under-delivery, and I therefore consider that a 5% buffer should be applied.

*(v) The suggested implementation rates*

91. The Council's Housing Supply Schedule<sup>50</sup> provides a detailed site-by-site assessment, including annual predicted completion rates on all sites with potential for 10 or more dwellings. This document, which draws on the detailed and up-to-date SHLAA<sup>51</sup>, is the product of a robust consultation exercise with developers, agents and landowners, and it deals with all the sites which are expected to contribute towards the delivery of housing in the Borough over the plan period.

*(vi) Small sites, windfalls and regeneration schemes*

92. The Council's 5 year HLS calculation includes a 'small site' windfall total of 550 units over this period. This reflects the fact that such sites have consistently become available in the Borough and no evidence was presented to the Examination to shed doubt on this source of housing coming forward over the next 5 years. The conservative estimate for housing sites from regeneration schemes has been excluded from the Council's calculations, as have sites arising from neighbourhood planning, although it is reasonable to assume that a proportion of the housing allocations currently in NPs (and possibly from a few regeneration schemes) would be completed before the end of the five year period.

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<sup>49</sup> BDBC: Note on the Housing Requirement in Neighbouring Authorities and Delivery Rates over the last 10 years; 23 October 2015 [Examination Document PS/05/11].

<sup>50</sup> BDBC: Updated HLS Statement, Appendix 1-Housing Supply Schedule (April 2015); August 2015 [Examination Document PS/02/43].

<sup>51</sup> BDBC: Strategic Housing Land Availability Assessment (SHLAA), Version 10; August 2015 [Examination Document PS/02/44].

*(vii) The appropriate period for making up the shortfall*

93. The Council's view is that making up the shortfall should be apportioned to the Council's total evenly over the plan period (commonly known as the Liverpool approach), whilst several (but not all) of the representations from house builders argued for the shortfall to be made up in the first 5 years (commonly known as the Sedgefield approach).
94. The PPG advises that the local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period, although this is qualified by the expression "where possible". The Council's reasons for pursuing the Liverpool approach are linked to its partial reliance on several large sites, which require the provision of significant infrastructure prior to the completion of the first dwellings. These major allocations, which I deal with below in more detail, are sustainably located, near to the main urban areas, especially Basingstoke; they can achieve economies of scale and important community and environmental provision. In my view, these benefits outweigh the delay in their implementation. I therefore support the use of the Liverpool approach for Basingstoke and Deane.
95. The housing trajectory<sup>52</sup> shows projected annual completions to exceed 1,000 dpa from 2017/18 through to 2024/25. It also shows that the shortfall would be made up completely over a period of 7 years, i.e. by 2021/22. The trajectory which is included in the Plan, as required by modification **[MM86]** ensures clarity in the effectiveness of the Plan in scheme delivery.
96. I therefore consider that the spreading of the shortfall over the entire plan period is the most appropriate method for Basingstoke and Deane. There are several recent Local Plan Examinations where the Liverpool method, has been found to be sound, including East Staffordshire (October 2015), Canterbury (August 2015) and Lichfield (January 2015).
97. The thrust of several representations is that there is urgency for the Plan to deliver the housing the Borough needs. The Council is aware of this and I am confident that it will proceed quickly to Plan adoption to enable the Borough to be able to benefit from the plan-led system as soon as possible.

*Five Year HLS and delivery - Conclusion*

98. I am satisfied from the evidence that 10 years is an appropriate period to assess whether there has been a persistent under-supply of houses in the Borough; that the Council's benchmarks are appropriate; and that on this basis, there has not been persistent under-delivery of housing in the Borough, and therefore, the imposition of a 5% buffer is reasonable. I also consider that the Council's calculations are partially, rather than over-dependent on large sites; and that the likely implementation rates as set out by the Council are reasonable.
99. Finally, I consider that spreading the shortfall over the length of the plan period is realistic for Basingstoke and Deane, given that the largest sites are programmed to come forward in higher numbers only from 2017/18, but once

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<sup>52</sup> BDBC: Housing Topic Paper-housing trajectory is on page 40; October 2014 [Examination Document TP01].

these sites come on-stream, they will yield housing completions in excess of 1,000 dpa every year until 2024/25.

100. Table 2 below, taken from the Council's Rebuttal Statement on Spatial Strategy and Housing Need<sup>53</sup>, explains how the calculation of 5.3 years' HLS is derived. I find this explanation reasonable, with one qualification which I discuss below.

*Table 2: The Council's Five year housing land supply (HLS) calculation*

<b>Total Requirement (2011 to 2029)</b>	<b>15,300 [850x18]</b>
Completions 2011-2015	1,951
Shortfall 2011-2015	1,449 [3,400-1,951]
5 year requirement 2015-2020	4,250 [850x5]
5 year requirement (plus 5% buffer)	4,463 [4,250+213]
5 year requirement (plus 5 % buffer and annual shortfall) [1,449÷14] x5	4,983 [4,463+520]
Annual Requirement	997 [4,983÷5]
Supply (including windfalls)	5,275
Years' supply	<b>5.3 years</b> [5,275÷997]

101. National policy does not specify whether the buffer should be applied before or after the shortfall. PAS guidance<sup>54</sup>, however, suggests that it should be added to the per annum figure plus the shortfall. In simple maths, this would result in a slight change to table 2 above, as follows: 5 years' housing requirement is 4,250 plus the proportionate amount of shortfall, which is rounded to 518 (i.e.  $1449 \div 14 \times 5$ ) = 4,768, plus the application of the 5% buffer (238) = 5,006 over the 5 year period, or 1,001 dpa, which set against the 5 years' supply of 5,275, gives a revised figure of **5.27 years'** supply of housing for Basingstoke and Deane. Whichever method is used, the Plan passes the 5 year HLS test assuming the addition of the shortfall is spread out over the plan period.

102. I therefore consider that the Plan, on adoption, has a reasonable prospect of delivering 5 years' supply of housing land in the Borough, based on a 5% buffer, with the shortfall averaged out over the length of the plan period.

*Are the proposed major new greenfield site allocations for housing and other uses positively prepared, justified and deliverable?*

103. Policy SS3 identifies 12 greenfield site allocations for housing and associated development, most of which are located on the fringes of Basingstoke. Around one third of the total housing provision for the Borough over the plan period is expected to come from the largest three allocations, ranging from 750 to 3,400 dwellings, and these are expected to yield a total of 5,150 out of a total of 7,690 dwellings for all 12 allocations.

104. Several concerns were expressed over the Plan's emphasis on these greenfield sites, and in particular in respect of the largest half dozen of these allocations. I deal with the overall strategic aspects of these concerns in Issue 1 above,

<sup>53</sup> BDBC: Rebuttal Statement-Issue 3: Spatial Strategy and Housing Need, Table 3.1: Housing Land Supply Calculation, page 16; 2 October 2015 [Examination Document PS/04/48c].

<sup>54</sup> PAS: Five Year Land Supply FAQ - see answer to Question 17; autumn 2014.

although it is worth re-emphasising that the strategy is underpinned by the SA, which indicates that these sites have fewer constraints and more benefits when compared to the realistic alternatives. The allocations were also reviewed through the SHLAA, which looks at the potential impacts of the proposed development on these sites and whether they could be mitigated.

105. In response to whether the Plan provides the appropriate level of detail to address the *what, when, where* and *how* requirements in national policy<sup>55</sup>, the main modifications to the Plan include the key diagram and the inclusion of inset maps **[MM2; 4; 6; 8; 10; 12; 14; 16; 20; and 31]** and revised phasing **[MM3]** are required in the interests of positive preparation and to accord with national planning policy.

106. I now turn to consider the specific soundness issues in relation to the 12 greenfield site allocations in the Plan.

#### *Sites outside Basingstoke*

107. There are two greenfield site allocations outside Basingstoke. Policy SS3.5 allocates approximately 120 dwellings at Overton Hill on the northern edge of Overton. Outline planning permission was recently granted on appeal, and a reserved matters application is in preparation. Policy SS3.6 allocates approximately 150 dwellings on land to the south of Blossworth Lane/Manor Farm, on the west side of the town of Whitchurch. The modifications to include inset maps for these two allocations **[MM12 and 13]** provide the appropriate level of detail as required in the PPG. This includes principal access points, and in the Whitchurch allocation, phasing and green corridors.

#### *Central Basingstoke*

108. Policy SS3.1 is for approximately 100 dwellings on land at Swing Swang Lane, which has good access to urban facilities. The partial SINC (Site of Importance for Nature Conservation) designation is addressed in part (h) of the policy. The modification to ensure connections to the public right of way and strategic cycle networks **[MM5]** ensures the policy is consistent with national policy. The modification to include an inset map **[MM4]** provides the appropriate level of detail as required by the PPG. This includes phasing, principal access points and an indicative pedestrian and cycling corridor. Subject to these modifications, the policy is sound.

#### *Sites to the East of Basingstoke*

109. Policies SS3.7 for Redlands and SS3.9 for land East of Basingstoke allocate 615 dwellings on connected sites on the eastern periphery of Basingstoke. Concerns include impacts from the nearby Basingstoke (Chineham) sewage treatment works (STW) on the amenities (living conditions) of future residents in terms of odour and on human health through the aerial distribution of bio aerosols.

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<sup>55</sup> PPG Ref ID: 12-002-20140306 *What should a Local Plan contain?*

110. These concerns were expressed at the Hearings and also through the submission of a number of technical publications<sup>56</sup>. Although these publications indicate an awareness of the public health risks posed by airborne microorganisms, the paper by Ewa Korzeniewska states there is no internationally accepted threshold limit value for biological contamination of air<sup>57</sup>. The same review, however, suggests in its summary<sup>58</sup> that: "*in order to eliminate the emission of bio aerosols and significant increase of the number of airborne microorganisms, covering grit tanks, section of (sic) raw sewage's influent to the primary settling tanks and aeration chambers seems to be necessary*". This appears to be the principal recommendation in the paper, and implies that the health risk can be overcome by effective management at source.
111. The Council's response to these concerns<sup>59</sup> states that articles such as the above review do not provide authoritative advice to UK regulators on the public health significance of bio aerosols associated with STWs. Furthermore, the advice from Public Health England (PHE) and the EA is that bio aerosol activities decline rapidly within the first 100m and disperse to background levels within 250m of the source.
112. Policies SS3.7 (g) and SS3.9 (o) require the preparation of comprehensive noise and odour studies, in consultation with the utility provider, which would inform layout decisions on Redlands and East of Basingstoke. I am satisfied from the submissions of the Council, including in consultation with PHE and the EA, that no significant odour or health risk has been identified in relation to the adjacent Chineham incinerator and the STW. I also note that in relation to bio aerosols, there is flexibility within the site allocation to consider the location of uses at a distance of 250m or more within the wider site. I agree with the Council that securing a development with this consideration in mind would be a 'highly precautionary approach'<sup>60</sup>, and on this basis the housing allocations to the East of Basingstoke are sound.
113. It is also noteworthy that Thames Water was successful in December 2015 in its application to HCC to install an anaerobic digestion plant at the Basingstoke (Chineham) STW. Support for both Redlands and East of Basingstoke allocations have come from EA and NE, and there is no objection from the utilities companies or from PHE.
114. Some residents and developers point out that the eastern periphery of the town has the potential to increase its development area to a significantly greater extent than in the two allocations in the Plan. They argue that increasing the housing allocation by including Lodge Farm, for example, would enable thresholds for community facilities to be exceeded. They also maintain that it would help redress the 'skewed' balance in the Plan which sees the 'lion's share' of new development going to the west and south-west of the

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<sup>56</sup> Paper on bio aerosols submitted by Mr Lytle at the 15 October session on Greenfield Site Allocations East of Basingstoke: Executive Summary by Mr Lytle [Examination Document PS/04/57a].

<sup>57</sup> Paper by Ewa Korzeniewska, University of Warmia and Mazury, Olsztyn, Poland: Emission of bacteria and fungi in the air from wastewater treatment plants – a review, section 2; January 2011 [within technical papers submitted in Examination Document PS/04/57b].

<sup>58</sup> Ibid, section 6.

<sup>59</sup> Policy SS3.9: East of Basingstoke – Response to Mr Lytle's Paper on Bio aerosols [Examination Document PS/05/MF/16].

<sup>60</sup> Ibid paragraph 5.4.

town. They suggest that this is a less sustainable strategy than increasing provision in the east/north-east side of the town. There are, however, significant environmental considerations which lead me to consider that a major expansion of these allocations is unsustainable during the plan period, and I address this matter under my section on omission sites (Lodge Farm) below.

115. The SCGs between the Council and HCC as landowner, local education authority (LEA) and local highways authority (LHA) for Redlands<sup>61</sup> and land East of Basingstoke<sup>62</sup> state that there are no significant constraints to the delivery of both of these sites. Redlands can be implemented from 2017/18 – 2021/22 and land East of Basingstoke over the period 2018/19 - 2022/23. They also commit the parties to the provision of the necessary supporting infrastructure, including a primary school if required by the LEA, highways access and access to the strategic cycle network, as well as the provision of a strong and defensible green buffer between the site and the open countryside, and the achievement of a flood resilient development.
116. The reduced dwelling yield of the allocation from an earlier proposal for 900 dwellings at Land East of Basingstoke was criticised by some developers as reducing the housing numbers to below the critical mass to support certain community facilities, such as a community centre. However, the Council and the LEA/LHA stated at the Hearings that there would be the critical mass to enable the necessary infrastructure to be put in place and I see no reason to come to a different view; moreover, the school would be in a position to support wider needs than just those arising from the allocation, whilst a bus loop to provide convenient access within the development would be feasible.
117. Concerns were raised over the capacity of the STW to treat the effluent from the proposed development to an acceptable level. The SCGs, however, point to the Council's Water Cycle Study, which together with representations from the EA and Thames Water<sup>63</sup>, demonstrate that there is sufficient capacity at the STW to accommodate all the development proposed in the plan period, including the 150 dwellings on policy SS3.7 and 450 dwellings on policy SS3.9.
118. The only area of uncommon ground between the parties to the SCGs relates to the requirement for gypsy and traveller (G&T) sites in criterion (b) of policy SS3.9, and I deal with this matter under G&T sites below.
119. Concerns were also expressed in relation to impact of the new development on the A33 main road, in particular that such development could limit any future widening of this road. However, the SCGs confirm that the impact of the development on the wider highways network can be mitigated, within the context of the allocations in the Plan, and that funding and a programme of works is in place to implement a series of improvements to the A33 corridor.

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<sup>61</sup> Statement of Common Ground (SCGs between Basingstoke and Deane Borough Council and Cooper Estates Strategic Land as landowner – and HCC and LHA – Local Plan Policy SS3.7 (Redlands); August 2015 [Examination Document PS/02/39].

<sup>62</sup> SCG between Basingstoke and Deane Borough Council and Hampshire County Council (HCC) as landowner – and HCC as Local Education Authority (LEA) and Local Highways Authority (LHA) – Local Plan Policy SS3.7 (Redlands); August 2015 [Examination Document PS/02/40].

<sup>63</sup> SCG between Basingstoke and Deane Borough Council and the EA and Thames Water – policy SS4 – ensuring water supply and policy EM6 water quality; August 2015 [Examination Document PS/02/38].

120. The modifications to ensure connections to the public right of way and strategic cycle networks **[MM15 and 21]** ensure consistency with national policy. The modification to include an inset map for both of these allocations **[MM14]** provides the appropriate level of information as required by the PPG. They include phasing, principal access points, indicative pedestrian and cycling access, primary school and centre, green corridor and National Cycle Network.

*Sites to the north of Basingstoke*

121. Policies SS3.8 for Upper Cufaude Farm and SS3.3 for Razor's Farm allocate 810 dwellings on connected sites to the north of Basingstoke. Concern was expressed by the National Trust and others that development in the north-west quarter of site SS3.8 would impact on the landscape setting of Vyne House Grade 1 Listed Building, which is a well-used visitor attraction<sup>64</sup>. The modifications exclude these fields from development and ensure a well-designed and robust barrier to reflect the existing landscape character and protect the setting of the heritage asset **[MM17; 18 and 83]** in accordance with paragraph 132 of *the Framework*.

122. The SCG between the Council and landowners<sup>65</sup> confirms that there are no significant constraints to the development of either allocation. A reserved matters application has been submitted for the first phase of 143 homes at Razor's Farm to be implemented over the period 2017/18 – 2022/23, and Upper Cufaude Farm over the period 2020/21 – 2025/26. A community centre, primary school and on-site open space are commitments in the SCG, which also states that impacts on the highways network can be mitigated. The modifications to include provision for walking and cycling routes **[MM9 and 19]** accord with section 4 of *the Framework*, which promotes sustainable transport.

123. The modification to include an inset map for the two sites **[MM16]** provides the appropriate level of information as required by the PPG. This includes phasing, principal access points, indicative pedestrian and cycling access and link to the National Cycle Network, proposed Chineham Station and car park, primary school and centre, and land for additional landscape and open space measures.

*North-west of Basingstoke*

124. Policy SS3.4 is for approximately 450 dwellings on land North of Popley Fields and development has already commenced. Policy SS3.4 (c) requires a green corridor to the south and east to meet the need for effective screening, especially as the site is on elevated land. The site can be implemented over the period 2015/16 – 2022/23.

125. The modification to ensure provision of internal walking and cycling routes linked to existing external routes and connections to the strategic cycle network with direct access to the town centre **[MM11]** ensures consistency with national policy. The modification to include an inset map for the site

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<sup>64</sup> BDBC: Basingstoke, Tadley and Bramley Landscape Capacity Study, pages 15-16; February 2008 [Examination Document ENV 08/02].

<sup>65</sup> SCG between BDBC and HCC as landowner – and HCC as LEA and LHA – local plan policy SS3.8 Upper Cufaude Farm; August 2015 [Examination Document PS/02/42].

**[MM10]** provides the appropriate level of information as required by the PPG, including phasing, principal access points and Green Corridor.

*West of Basingstoke*

126. Policy SS3.10 for land at Manydown is the largest single development allocation in the Plan for 3,400 dwellings over the plan period.

(i) *Principle of development*

127. The SA concludes that the development of 3,400 dwellings at Manydown is an acceptable and realistic option for the Plan, although option 4, for a larger development of around 5,000 dwellings is ruled out as not being developable within the plan period. A number of representations are made against the principle of such a large allocation to the west of the town. These are mainly on the grounds that the geographical distribution of new housing around Basingstoke is considered to be unbalanced to the west and south-west, on sites that are too far away from the town centre and employment areas for sustainable transport access, and are therefore not sustainably located.

128. However, much of the previous growth of Basingstoke has been to the east and north-east of the town, and in essence the quantum of development provided for in the Plan to the west and south-west can be viewed as catching up. A strong reason for the geographical focus of the Plan strategy is that the Loddon Valley forms an effective barrier to further significant growth of the town to the east, beyond the allocations in the Plan, for landscape and nature conservation reasons. The sites to the west and south-west of the town are within acceptable commuting distances to employment areas in the town. The improved bus access and cycling routes into the town centre and elsewhere from these western and south-western allocations are supported and promoted by both the LHA and cyclists' representatives.

129. Representations on the grounds of deliverability and environmental, traffic and infrastructure impact are made, and I consider these below.

(ii) *Viability, deliverability and provision of infrastructure, services and facilities*

130. The SCG between the Council and HCC as landowner, LHA and LEA<sup>66</sup> confirms that the allocation could be delivered during the plan period, with a trajectory showing the first housing completions coming on stream in 2017/18, and averaging 300 dpa from 2019/20 onwards. I have already concluded that I do not consider the policy is over-optimistic in its proposed delivery rate. The SCG points out that the delivery rates have been informed by a study by Aecom and HDH Planning and Development<sup>67</sup>, to arrive at a realistic build-out rate for Manydown. This study notes that the Savills and Hourigan Connolly research on length of time for the implementation of large sites (referred to

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<sup>66</sup> SCG between BDBC and HCC as landowners, LHA and LEA – local plan policy SS3.10; dated August 2015 [Examination Document PS/02/48].

<sup>67</sup> Aecom Town Planning: Hearing Statement – Issue 5 – Manydown (Policy SS3.10), see section 1.6; September 2016 [Examination Document PS/04/26b].

earlier in this report) "*does not necessarily reflect the unique circumstances of Manydown which will not be a traditional private sector led model*"<sup>68</sup>.

131. The Aecom document draws attention to a number of other factors in support of the housing trajectory in the SCG. Stronger housing market conditions support higher rates of delivery, with a recent report by Savills predicting a 6.5% increase in 2015 and an 18.5% increase over the next 5 years in the mainstream residential markets<sup>69</sup>. Secondly, the 2015 Budget provides capacity funding to Basingstoke to support proposals for development on garden town principles<sup>70</sup>. Thirdly, a wide range of housing tenures is available, which should provide for a more consistent delivery rates<sup>71</sup>. Also, the allocation is large enough to clearly establish phases and differently priced market housing across the site and a range of densities<sup>72</sup>. All the above points support the likelihood that the Manydown allocation will be delivered during the plan period.
132. Bearing in mind the site's importance to the overall housing delivery of the Plan, a second SCG was issued between the Council and the landowners<sup>73</sup>. This reaffirmed the delivery trajectory across all the sites at Manydown, including the parcels at Worting, which could provide an early phase of development.
133. The second SCG underlines the fact that delivery at Manydown is a significant corporate priority for both the Council and HCC, both of which are committed to an early delivery of housing and infrastructure; the SCG sets out a realistic timetable for community consultation, submission of planning application, discharge of conditions and commencement of development, and first housing delivery is programmed for 2018/19; it anticipates that the first phases of development can be opened up with only a modest amount of strategic infrastructure, enabling development to commence quickly; and that a delivery rate of 320 dpa is achievable with up to four sales outlets.
134. In view of the importance of ensuring the provision of infrastructure in a timely manner, the modification to require an Infrastructure Delivery Strategy (IDS), to accompany each outline/full planning application within the allocation, will ensure that the infrastructure and mitigation requirements of the Manydown allocation are comprehensively planned and will be met **[MM24]**. This ensures the effectiveness of the Plan. This modification has been agreed by all parties involved in the implementation of the Manydown allocation.
135. The viability of the allocation, including the supporting physical and community infrastructure, is confirmed in the consultant's Viability Report<sup>74</sup>, which sets out both the key residential valuation assumptions and the principal 'other development' costs, which I consider to be reasonable.

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<sup>68</sup> Ibid: Paragraph 1.6.12.

<sup>69</sup> Ibid: Savills survey referred to in paragraph 1.6.11.

<sup>70</sup> Ibid: paragraph 1.6.12.

<sup>71</sup> Ibid: paragraph 1.6.13.

<sup>72</sup> Ibid: paragraph 1.6.15.

<sup>73</sup> SCG between BDBC, HCC, Worting Business Park Ltd (Pro Vision) and Flavia Estates (Woolf Bond) – local plan policy SS3.10; October 2015 [Examination Document PS/04/58a].

<sup>74</sup> Three Dragons: Manydown and Golf Course Viability Report; July 2014 [Examination Document H11].

*(iii) Environmental impact*

136. In response to environmental concerns, the Council's Housing Site Assessment<sup>75</sup> and the SA<sup>76</sup> identify that any harmful landscape and biodiversity impacts could be mitigated. It is also apparent from the accompanied site visits that the expansive tracts of woodland, including Wootton Copse and Worting Wood, would largely conceal the proposed development from views from the west, north-west and the north.
137. The above-mentioned assessments also cover the provision of infrastructure, such as highways, education, health and other community facilities. The modification to include healthcare facilities at Manydown **[MM24]**, accords with national policy<sup>77</sup>, which underlines the relevance of health and well-being and health infrastructure to land use planning.

*(iv) Impact on nearby communities*

138. Modifications address the concerns that Oakley and other nearby settlements would lose their separate identities once the Manydown scheme was completed. These modifications include conserving the Roman Road as a green boundary and the road through Wootton St Lawrence **[MM25 and 26]** in the interests of positive planning.

*(v) Western Bypass*

139. The delivery of a western bypass is a long term ambition of the Council. It is not, however, included in any implementation programmes of the LHA, and it is therefore inappropriate to include it within a Plan policy. The modification to delete the western bypass from policy SS3.10 and replace it with explanatory text **[MM28 and 22]** accords with national policy. The need to secure safeguarded land for a potential future crossing of the railway is necessary in the interests of positive planning, and a modification **[MM27]** achieves this.

*(vi) Walking and cycling*

140. A modification **[MM29]** ensures provision of internal walking and cycling routes linked to existing external routes and connections to the strategic cycle network with direct access to the town centre. This ensures consistency with national policy.

*(vii) Five Ways Junction, Kempshott*

141. A key focus of concern is whether Five Ways Junction in Kempshott, situated just outside the Manydown allocation to the south-east, would have sufficient capacity to accommodate the increased traffic flows generated by the development. A second important concern is whether the junction would be 'user-friendly' for pedestrians and cyclists. A Joint Technical Note<sup>78</sup> extends the transport modelling of the junction from an end date of 2021 to the end of

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<sup>75</sup> BDBC Housing Site Assessment Volume 2; March 2014 [Examination Document HO/05].

<sup>76</sup> SA Appendix 14; July 2015 [Examination Document PS/02/16].

<sup>77</sup> PPG, Ref ID: 53-004-2010306 *How should health and well-being and health infrastructure be considered in planning decision making?*

<sup>78</sup> HCC: MF23 Fiveways – Joint Technical Note – Fiveways Junction Update, by the LHA, LPA and SS3.10 Promoters; 6 November 2015 [Examination Document PS/05/23].

the plan period. This Note was commissioned during the Examination Hearings, and it was considered at an additional Hearing session.

142. The Joint Technical Note is based on improvements to the junction which are set out in a drawing<sup>79</sup> attached as Appendix 1 to that Note. Based on this drawing, the Note concludes that the improvements can deliver an appropriate level of mitigation at the junction, to accommodate the growth provided for in the Plan without a severe residual highway impact. This evidence demonstrates that there would be 'nil detriment' to the capacity of the junction to handle the projected flows during the plan period. By definition, the 'severity test', based on paragraph 32 of *the Framework*, is a step away from 'nil detriment', and the Manydown allocation does not therefore fail this test of national policy.

143. The Note is prepared to an appropriate technical standard and is endorsed by the LHA. Consequently I do not agree with the comment that the traffic survey, which was conducted on a single day (9 September 2015) means that the Note's conclusions are "*hanging by a slender thread*". I also accept the evidence from the LHA and scheme promoters that the scheme is not predicated on the removal of the existing cycling facilities. The Note provides an acceptable level of detail for local plan purposes, and in principle there is no reason why the junction should not be able to cope with forecast traffic flows based on the allocations in the Plan.

144. In response to how 'user-friendly' the junction would be for both pedestrians and cyclists, I note that the proposed improvement would retain the same footway widths, pedestrian facilities, Advance Stop Lines for cyclists, and 'all red cycle call'<sup>80</sup> that exists in the current arrangements. Cyclists can continue to travel through the junction using on-road advisory cycle facilities which currently are used. In view of the sensitive nature of this issue, modification **[MM 30]** limits the yield of dwellings on land to the south of the railway line from 'approximately' to 'up to' 300 units, as this development would impact directly on Five Ways junction.

(viii) *Gypsy and Traveller (G&T) Accommodation*

145. The only area of uncommon ground between the parties in the SCG is regarding G&T accommodation, which the landowner considers is not justified. I deal with this matter later in the report.

(ix) *Inset Map*

146. The modification to include an inset map for Manydown **[MM23]** provides the appropriate level of information as required by the PPG. This includes phasing, principal access points, Country Park, indicative area in which land will be required for railway crossing, primary school and centre, secondary school and centre, indicative pedestrian and cycling corridors, pedestrian and cycling links and potential Link Road.

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<sup>79</sup> Ibid: Drawing FIVE-ACH-AH-00-SK-CE-00002 Revision P01 (Appendix 1).

<sup>80</sup> Ibid: paragraph 27.

*South-west Basingstoke*

147. Policies SS3.2 for Kennel Farm, SS3.11 for Basingstoke Golf Course and SS3.12 for Hounsome Fields together comprise a combined development area for approximately 2,060 dwellings on both sides of the A30 at its south-west entrance to Basingstoke.

148. Kennel Farm would yield approximately 310 dwellings and has outline planning permission, recently granted at appeal. The reserved matters application has been approved and the first completions are forecast in 2016/17. The modification to ensure connections to the public right of way and strategic cycle networks **[MM7]** ensures consistency with national policy.

(i) *Principle of development*

149. The SA concludes that large scale housing provision in south-west Basingstoke is an acceptable and realistic option for the Plan. The representations against the principle of these allocations are mainly on the grounds that the geographical distribution of new housing around Basingstoke is considered to be unbalanced to the west and south-west, on sites that are too far away from the town centre and employment areas for sustainable transport access. I deal with these arguments in my section on Manydown, above, and I consider that the arguments for south-west Basingstoke are the same.

150. There are no objections from the LEP or the business community regarding the impact that these allocations would have on the economic growth strategy of the Borough, and I have no grounds to take a different view.

151. I deal with representations on the grounds of deliverability and environmental, traffic and infrastructure impact below.

(ii) *Viability, deliverability and provision of infrastructure, services and facilities*

152. The SCGs between the Council and the landowners for the Golf Course<sup>81</sup> and for Hounsome Fields<sup>82</sup> provide details on how the allocations would be delivered, as do the viability studies referred to above. The inclusion of an IDS, to accompany each outline/full planning application within the allocation, will ensure that the infrastructure requirements and mitigation requirements of the south-west Basingstoke allocations have been comprehensively planned and will be met **[MM24]**. This ensures the Plan is deliverable and therefore effective. This modification has been agreed by all parties involved in the implementation of the south-west Basingstoke allocations.

153. The IDS recognises the interdependencies of the three allocations in south-west Basingstoke and the need to overcome the potential severance effect of the A30. This particular set of circumstances is not repeated elsewhere in the Plan. The IDP (which I consider in more detail in Issue 5 below) is regarded

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<sup>81</sup> SCG between Basingstoke Golf Club, BDBC, LHA and LEA – local plan policy SS3.11; August 2015 [Examination Document PS/02/49].

<sup>82</sup> SCG between Hounsome Fields (Wates Developments Ltd), BDBC, LHA and LEA – local plan policy SS3.12; dated August 2015 [Examination Document PS/02/50].

as sufficiently focused to enable the satisfactory delivery of the other allocations in the Plan.

154. Further modifications [MM32 and 35] update criterion (c) of the policy to ensure there is adequate land to meet the outdoor sports needs of both the Golf Course and Hounsome Fields allocations. These modifications ensure the Plan is positively prepared in this regard.
155. The policies provide for a range of community facilities, such as schools, health care and shops. The proposed critical treatment hospital, to be located just to the south-west of Hounsome Fields, would also consolidate development in this part of the town and provide significant local employment opportunities for many future residents. I therefore consider that the location of these allocations, together with the range of community facilities which can be seen on the inset map, is highly sustainable.
156. Concern was expressed over the loss of the golf course as a recreational facility for local people, especially in the light of the protective stance towards such facilities in paragraph 74 of *the Framework*. This paragraph, however, permits such a loss where an assessment clearly shows these facilities are surplus to requirements; or the loss would be replaced by better provision on a suitable location; or the development is for alternative recreational provision. National policy is reflected in Plan policy CN8.
157. The SCG between the Golf Club, the Council and the LEA/LHA<sup>83</sup> demonstrates that the projected demand for playing golf over the plan period can be met on alternative sites within 2-11 miles from Basingstoke town centre. It also points to a 6.8% national decline in golf participation over the period 2007/08-2011/12, a trend which is expected to continue for the foreseeable future. This decline is also reflected locally.
158. I am satisfied from the above evidence, none of which was robustly challenged, that the benefits of allocating the golf course site for 1,000 dwellings plus community facilities outweighs the loss of the existing golf course.
159. Concerns were expressed regarding costs of sewerage connections and STW capacity being inadequate to accommodate the south-west Basingstoke developments. Flood risk was also cited as a concern. The scheme promoters stated at the Hearings that they were confident that these issues were not 'showstoppers', a view I agree with, especially in the absence of robust evidence to the contrary. I deal with these matters in more detail under Issues 4 and 6 below.

(iii) *Environmental impact*

160. The Council's Landscape Capacity Study<sup>84</sup> identifies the Golf Course to have a medium landscape capacity, and the site has a neutral landscape score in the SA assessment. Hounsome Fields is located on land which slopes southwards

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<sup>83</sup> SCG between Basingstoke Golf Club, BDBC, LEA and LHA – Justification for the loss of the Golf Course, paragraphs 2.2-2.16; August 2015 [Examination Document PS/02/49].

<sup>84</sup> BDBC: Basingstoke, Tadley and Bramley Landscape Capacity Study; February 2008 [Examination Document ENV08].

from a ridgeline that contains much of the urban development to the north (although development in the neighbouring Beggarwood area crosses the line); the SA scores a negative impact for development, and the Landscape Study gives it a low landscape capacity. My own site visits confirm these assessments of the character and appearance of the landscape of these two sites.

161. The ridge line, however, is a subtle rather than strident physical form and it is not in my view an absolute constraint on new development. It was taken into consideration, however, in the overall balancing exercise for Hounsome Fields<sup>85</sup>. Criteria (d) and (e) of both policies highlight the importance of mitigation. The illustrative masterplan for the Golf Course<sup>86</sup> and Draft Illustrative Zoning Plan for Hounsome Fields<sup>87</sup> show that there is sufficient space to protect and maintain the setting of the key landscape features on both sites. The SCGs also commit to submitting a detailed Landscape and Visual Impact Assessment with any future planning application to demonstrate how the proposals would respond to the special characteristics and sensitivities of the landscape.

(iv) *Agricultural land loss*

162. The loss of some good quality agricultural land is recognised in the overall balancing exercise, and has been considered at all stages of the SA input to the Plan<sup>88</sup>. However, this is not highlighted as a negative impact and I consider that some loss of agricultural land is inevitable if the Borough is to address its objectively assessed development needs.

(v) *Sustainable transport*

163. The Agreed Transport Statement (TS) for both the Golf Course and Hounsome Fields sites<sup>89</sup> concludes that opportunities for sustainable travel can be taken up in a realistic way, and that it is not therefore the case that the location and design of the allocations would encourage car-borne traffic. The modifications to ensure connections to the public right of way and strategic cycle networks **[MM33 and 36]** ensure consistency with national policy, as are the modifications to ensure the provision of public transport from the outset **[MM34 and 37]**.

(vi) *Impact on heritage assets*

164. The setting of Southwood Farmhouse, a Grade II Listed Building, requires a separation distance of at least 100m from the Hounsome Fields development. I note that the scheme promoter has indicated that this will be taken into account in the illustrative masterplan, which will follow the principles set out in criterion (g) of policy SS3.12. The archaeological potential of the Roman Road

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<sup>85</sup> BDBC: Landscape of Basingstoke Course (SS3.11) and Hounsome Fields (SS3.12); 30 October 2015 [Examination Document PS/05/MF/24].

<sup>86</sup> SCG on the Golf Course Appendix 1 [Examination Document PS/02/49].

<sup>87</sup> Appendix 1 to Statement by Wates Developments – Policy SS3.12 Hounsome Fields; September 2015 [Examination Document PS/04/37a].

<sup>88</sup> For example, see SA Report May 2015, page 141 (5); May 2015 [Examination Document PS/02/16].

<sup>89</sup> Appendix 7 to SCG for Golf Course and Appendix 6 to SCG for Hounsome Fields; August 2015 [Examination Documents PS/02/49 & 50].

which runs along the western boundary of Hounsome Fields is safeguarded under the requirements of policy EM11 (the historic environment).

(vii) *Gypsy and traveller (G&T) accommodation*

165. The only area of uncommon ground between the parties in the SCG is regarding G&T accommodation, which the landowner considers is not justified. I deal with this matter later in the report.

(viii) *A 30 Severance*

166. The Transport Statement (TS) concludes that there is a safe and suitable access arrangement for vehicles, cycles and pedestrians, including 'at grade' crossings of the A30. The TS also notes the low accident rate on this section of the A30. At this stage a specific junction design has not been finalised, but all three options tested in the TS would provide an acceptable level of operation over the plan period, with no need for a grade separated pedestrian crossing of the A30. The potential severance impact of the A30 is addressed in the IDS and the indicative locations of the three proposed pedestrian/cycle crossings are shown on the inset map.

(ix) *Impact on highways capacity*

167. The TS concludes that firstly, based on a 'worst case' modelling scenario, adequate capacity would be achieved at the site accesses, and land would be safeguarded to allow for a possible upgrading to cope with increased demands from the potential delivery of a western bypass connecting the A339 with the A30 sometime after the end of the plan period.

168. Regarding wider traffic impacts on the highways network, the Transport Assessment (TA)<sup>90</sup> produced for the scheme developers identifies a series of deliverable interventions along the A30 corridor between the M3 Junction 7 and the town centre. The conclusion of this work is that the implementation of the allocations in south-west Basingstoke "is unlikely to result in severe cumulative impacts on traffic congestion on key routes"<sup>91</sup>. I therefore consider that the south-west allocations will not have a severe residual impact on the highway network and as such would not be contrary to paragraph 32[3] of *the Framework*.

(x) *Noise impact*

169. In view of the proximity of part of the south-eastern corner of the Golf Course site to the M3 motorway and its continual traffic noise for much of the day and night, noise mitigation measures would be necessary at the detailed planning stage. Policy SS3.11 (m) requires these measures to be put in place both next to the M3 and also in relation to the A30.

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<sup>90</sup> Basingstoke Transport Assessment (TA) Ninth Edition; February 2015 (referred to in paragraph 4.4.2 of Appendix 7 of SCG on Basingstoke Golf Club).

<sup>91</sup> Ibid: paragraph 4.4.5.

(xi) *Inset map*

170. Concern is expressed over lack of a masterplan to guide development. Progress, however, has been made towards completion of full masterplans, and a number of zoning, constraints and illustrative masterplans have already been submitted. This is sufficient to enable due consideration of the allocations in south-west Basingstoke. The modification to include an inset map for these sites **[MM31]**, together with the further modification of the inset map to identify three pedestrian/cycle crossings on the A30, as suggested by HCC in its further representations in the interests of safety **[MM85]**, provides the appropriate level of information as required by the PPG. This includes phasing, principal vehicular access points, community/shopping centres, primary school on Hounsome Fields, pedestrian/cycling connections to the town centre and A30 crossing points and future access that may be needed to serve development to the north-west of the site.

*Greenfield site allocations - conclusion*

171. Taking all the above matters into account, I consider that the 12 greenfield site allocations in the Plan are, subject to the above modifications, positively prepared; justified in the light of reasonable alternatives; deliverable within the plan period and therefore effective; and cumulatively, will contribute significantly to meeting the government's housing targets for Basingstoke and Deane and are therefore in accordance with national policy.

*Neighbourhood Plans*

172. Policy SS5 commits the Council to supporting the neighbourhood planning process and sets housing targets for five settlements, together with a further amount to be distributed elsewhere. In addition to the five Neighbourhood Plans (NPs) specifically referred to in the policy, preparation has started on a further eight NPs and one Neighbourhood Development Order at the time of the Examination. The NPs which have progressed provide for the amount of new housing identified in policy SS5.

173. There is concern that policy SS5 unnecessarily restricts the number of houses that could be delivered in each NP, and that the Council is abandoning its strategic role and ignoring the significant need for development in many rural settlements which currently do not have a NP. Several settlements are cited as having the potential to exceed their NP allocations, in some cases significantly. On the other hand, there is considerable support for the policy from local residents and their elected representatives, who see NPs as a real chance to shape their own destiny, and in some cases, there is positive working between local people and prospective developers.

174. There is a fine balance to be drawn between the Plan providing broad strategic direction and encouraging local agendas. Paragraph 184 of *the Framework* addresses this matter, stating that NPs must be in general conformity with the strategic policies of the Local Plan. In setting overall targets for each NP, the Plan achieves an appropriate balance between strategic direction and localism.

175. The recommended modifications change the policy wording connected with these targets from 'approximately' to 'at least' and include the requirement to

identify sites/opportunities to deliver at least 10 homes in and around each of the settlements with defined settlement boundaries **[MM40 and 41]**. They provide an appropriate level of flexibility to respond to needs in these parts of the Borough to achieve the strategic/local balance in accordance with national policy. The term 'at least' is common practice in local plans and does not equate to an unlimited amount of further development.

176. I have carefully considered the suggested further modifications which are based on concern over the implications of an 'open ended' provision for each of the five settlements to which policy SS5 relates. My first response is that it is clear from the policy that it is for the NPs to determine the detailed housing allocations for each of these settlements. It seems reasonable that a parish/town council could set a housing total close to the figure in the policy, and certainly a figure which is not significantly greater.
177. Secondly, in relation to Bramley, I accept that the settlement faces specific challenges, and in particular the fact that the railway through the village is crossed by a single level crossing. I am also aware from the discussions at the Hearings that the Great Western Electrification Programme is likely to result in increased train movements through Bramley.
178. Bramley station, however, has good links to Basingstoke, Reading and London, and a potentially excellent link to Crossrail. This is an important consideration in determining the dwelling provision in the village on sustainability grounds, and on balance I consider that the provision for Bramley should not revert to 'approximately' as in the submitted Plan. I therefore do not consider that further changes to MMs 40 and 41 are justified.
179. The modification to policy SS5, to include a requirement to monitor the situation annually **[MM42]** ensures that the Plan is effective. I therefore consider that policy SS5, subject to the above modifications, is sound.

#### *Omission sites*

180. Several omitted sites are put forward for inclusion in the Plan. They are all formally promoted through duly made representations. I set out my comments on these sites below.

(i) *Land at Dixon Road, Chineham*

181. The site has capacity for approximately 100 dwellings, including 40% AH. Its use is for timber production, and it has been issued with a Restocking Notice by the Forestry Commission after the unlicensed felling of trees. The site is located in a strategic gap for Basingstoke/Chineham/Bramley/Sherfield on Loddon, and it is not considered suitable for residential development in the SHLAA<sup>92</sup>, with particular reference to the permanent loss of woodland. For the above reasons I see no justification for the inclusion of this site within the Plan for housing purposes.

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<sup>92</sup> SHLAA Ref SOL009.

(ii) *Land at Smith's Field, Droxford Crescent, New Road, Tadley*

182. This site has capacity for approximately 25 dwellings, including 40% AH. The principal constraint on this site is its location within the inner consultation zone of the Atomic Weapons Establishment (AWE) at Aldermaston, and I deal with this issue later in my report. In the light of this consideration, I see no justification for the inclusion of this site within the Plan for housing purposes.

(iii) *North Fields, Overton*

183. This site has capacity for approximately 200 dwellings, including 40% AH. Whilst the site was considered during the early stages of the plan making process, it is noted that significant landscape character and heritage concerns were identified through the Council's detailed site assessment analysis<sup>93</sup>. In addition, the site has been considered as being unsuitable for allocation during the process of preparing the Overton NP, whilst four other sites have been allocated for housing development in the Overton NP. For these reasons I see no justification for the inclusion of this site within the Plan for housing purposes.

(iv) *Sherfield Hill Farm, Sherfield-on-Loddon*

184. This site has capacity for approximately 240 dwellings, including AH and community/health facilities. The SHLAA states<sup>94</sup> that the site would extend urban development into the countryside and it is not considered to be suitable for a strategic allocation. However, the site is well related to allocation SS3.7 Redlands, and urban facilities and services. In the event that the Council could not demonstrate a 5 year supply of housing, this site could be considered a 'front runner' in view of its sustainability credentials and proximity to eastern Basingstoke; alternatively, the site could be assessed as part of the process of site selection in an emerging NP.

(v) *Redlands House, Chineham*

185. This site has capacity for approximately 150 dwellings. The SHLAA states<sup>95</sup> that the smaller, northern part, which has substantial tree cover, could yield 15 dwellings, and the Council states that this site could be included within SS3.7 with a small boundary change. This proposed change **[MM84]** is justified in that it would not result in any environmental harm, subject to selective protection of the trees on the site.

186. The majority of the southern site, however, extends to within the odour exposure levels that are likely to occur around the Basingstoke STW as defined in the Odour Assessment Report for the East of Basingstoke site.<sup>96</sup> I therefore have concerns whether acceptable odour standards for future residents could be achieved on the majority of the southern site. Until such time as improvements to the STW significantly reduce the extent of these contours, the southern site should not be included within the Plan for housing purposes.

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<sup>93</sup> SHLAA Ref H005.

<sup>94</sup> SHLAA SOL007.

<sup>95</sup> SHLAA SOL008.

<sup>96</sup> Examination Document ENV15.

(vi) *Land to the west of Winchester Road, Kingsclere*

187. This site has capacity for approximately 30-50 dwellings. The SHLAA<sup>97</sup> concludes that the site is not suitable for development, and identifies a number of critical constraints, including location within flood zones 2 and 3; a Conservation Area; and AONB. Moreover, the site has only limited containment, so that it is difficult to see how design or landscaping could overcome all these constraints.

(vii) *Park Farm, Oakley*

188. This site has capacity for approximately 150 dwellings. The SHLAA<sup>98</sup> is supportive of development, stating that the site could come forward through a NP. I note the comment made at the Hearings that Oakley could satisfactorily accommodate a significant amount of additional housing and the settlement has a number of important sustainability credentials. I consider that the appropriate way forward is to assess the site in the context of the NP, within the strategic context set out in policy SS5. I note that the Oakley and Deane NP received a yes vote at the referendum on 17 March 2016, and is due to be made on 26 May 2016.

(viii) *Rooksdown Lane and Mary Lane, North Waltham*

189. These sites (no dwelling capacities given) are included in the table of rejected sites in the SHLAA<sup>99</sup>. Rooksdown is rejected on the grounds that it is isolated from the settlement boundary and lies within open countryside. The size of the Mary Lane site would give rise to concerns over the impact such a scale of development would have on the character of the village. In view of these considerations, plus the fact that the small village has limited facilities, I see no justification for the inclusion of these sites within the Plan for housing purposes.

(ix) *Strawberry Fields, Sherfield Road, Bramley*

190. This site has capacity for approximately 130 dwellings, including AH. Although Bramley is a sustainable village, the SHLAA<sup>100</sup> notes that the northern part of the site lies within flood zones 2, 3a and 3b, whilst the south-eastern boundary adjoins the Bramley Green Conservation Area. A reduced part of the site could be considered for development, and I consider the appropriate way forward is to assess the site in the context of the NP, within the strategic context set out in policy SS5. I note that the site now has a resolution to grant for 50 dwellings (February 2016).

(x) *Lodge Farm, Poors Farm and Hodds Farm, Basingstoke*

191. These three sites on the eastern side of Basingstoke have a combined capacity of approximately 4,796 dwellings. The SHLAA<sup>101</sup> for Lodge Farm and Poors Farm states that they would need to be considered together as a

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<sup>97</sup> SHLAA KING005.

<sup>98</sup> SHLAA Ref OAK006 and OAK006a.

<sup>99</sup> SHLAA Ref BAS131 and NWAL006.

<sup>100</sup> SHLAA Ref BRAM010.

<sup>101</sup> SHLAA Ref BAS102, BAS103 and OLD005.

comprehensive development scheme, together with Land East of Basingstoke, which is allocated as site SS3.9. However, the EA has objected on the grounds of flood risk and impact on the River Loddon and associated wetlands on biodiversity grounds.

192. The site at Hodds Farm, located just to the south, at Old Basing, also has sensitive landscape and biodiversity issues. None of the trajectories included in support of developing these sites shows projected completions within the first five years of the plan period. In view of these considerations, I see no justification for the inclusion of these sites in the Plan within the plan period. Some representations hint at the possibility of these schemes being brought forward for development beyond the plan period. Even then, I envisage major infrastructural work, on the assumption that impact on the biodiversity of the Loddon Valley can be mitigated to an acceptable standard, although it is difficult to see at this point in time how this could be achieved.

*Omission sites – conclusion:*

193. I have already concluded that the Plan can meet its OAN on a sufficient level of projected completions on deliverable sites without the need for any of the omission sites to be included in the Plan. However, some of these sites could be assessed as part of the process of site selection in emerging NPs and others have the potential for further serious consideration during the preparation of a subsequent Plan.

*Affordable housing (AH)*

194. The objectively assessed affordable housing (AH) need for Basingstoke and Deane is set out in the Council's Housing Needs Statement (HNS) (August 2015)<sup>102</sup> and was updated during the Examination Hearings<sup>103</sup>. The HNS estimates the AH need for the Borough by adding the newly arising annual need (802 dwellings) to the annual net current need (33) and then deducts the supply from relets (525), producing a AH need figure of 310 AH dpa. This follows the methodology set out in the PPG<sup>104</sup>. The estimate of AH need in the HNS approximates to the SHMA calculation of 318 AH dpa, calculated in May 2015, some three months earlier, was calculated on a different basis.

195. The SHMA states that any longer period than 5 years for assessing the Borough's AH need has been discounted because housing market conditions can vary so greatly that delivery and arising need figures cannot be assumed to stay constant over that time<sup>105</sup>. However, the plan period covers the 14 years from the date of the Examination and it is therefore appropriate that the annual AH provision in the Plan, which would amount to a straight line projection of 4,452 over the remainder of the plan period (318x14), remains in place until such time as a further SHMA updates the situation, possibly as part of a future review of the Plan.

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<sup>102</sup> BDBC: Housing Needs Statement (HNS), Table 3.13, Appendix 9; August 2015 [Examination Document PS/02/47].

<sup>103</sup> Examination Document PS/05/MF08; October 2015.

<sup>104</sup> PPG ID: 2a-029-20140306 *What is the total need for affordable housing?*

<sup>105</sup> SHMA Update, paragraph 8.1; May 2015 [Examination Document PS/02/17].

196. The HNS also provides further details on the composition of the AH need in the Borough; 29.8% of new households would require some form of AH, divided into 28.3% requiring social rented housing and the remaining 1.5% requiring intermediate housing, such as shared ownership<sup>106</sup>.
197. I have already set out the background to explain the revision of the AH needs figure, both upwards to accommodate the inclusion of single people under 35 years and then downwards to reflect the changes to the eligibility criteria. This gives a net reduction of the Borough's annual AH requirement to 296 dpa, which is equivalent to 34.8% of the overall delivery of its housing requirement of 850 dpa. I am satisfied that the affordability test applied by the Council is in line with the PPG, which states that: *"unmet need should include only those households who cannot afford to access suitable housing on the market"*<sup>107</sup>.
198. On this basis, I agree with the Council that policy CN1, which requires 40% AH on all housing market sites, can fully meet the Borough's AH needs, with some headroom if, for example, the eligibility criteria are adjusted to increase the AH needs figure for the Borough.
199. Concerns were expressed that a 40% AH requirement was not realistic in the Borough and that the recent low delivery rates confirm this. It is true that the Council has not reached the level of 40% AH provision in recent years, as the SHMA shows<sup>108</sup>, with an AH delivery of around 30% since 2001/02, and with the last two years recording 8.9% and 7.2% respectively. There are, however, plausible reasons for this, including the fact that there is currently no local plan requirement in Basingstoke and Deane for AH provision on developments below 15 dwellings, which clearly lowers the delivery rate, and that the AH target up to 2006 was only 20%.
200. Viability reports commissioned by the Council, (referred to earlier) demonstrate that 40% AH would be viable in the vast majority of cases across the Borough (albeit with an affordable rent emphasis). They also demonstrate that policy CN1 is sufficiently flexible to respond to genuine cases where schemes cannot meet policy requirements on viability grounds.
201. I can see no justification for the AH percentage to be set as a ceiling, as requested by some respondents. Neither do I see the need for a more detailed policy with specific house size requirements. The policy as it stands gives maximum scope for interpretation and adaptability to meet the precise needs which may vary over time and location.
202. I do not consider that the AH needs of the rural areas are neglected in the Plan. Policy CN2, for example, covers rural exception schemes, which together with NP allocations would extend AH provision to these areas.
203. The suggested modifications to policy CN1 and its explanatory text, to require 15% of all AH to meet enhanced accessibility standards, to enable people to stay in their homes as their needs change **[MM48-50; 52 and 53]** is

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<sup>106</sup> HNS, Appendix 9, Table 2.2, August 2015 [Examination Document PS/02/47].

<sup>107</sup> PPG ID: 2a-024-20140306 *How should the current unmet gross need for affordable housing be calculated?*

<sup>108</sup> Ibid: Table 4.5, pages 69/70.

supported by the Council and the HBF (agreed in a SCG<sup>109</sup>). This brings the Plan into line with the PPG, which states that local planning authorities (LPAs) should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements<sup>110</sup>.

204. On the basis of the above factors, I consider that policy CN1, subject to the above modifications, is justified, effective and accords with national planning policy.

#### *Accommodation for gypsies and travellers*

205. At the Exploratory Meeting, I expressed concern that policy CN5 was silent on gypsy and traveller (G&T) requirements in terms of numbers of pitches and that the relevant evidence needs to be provided. The amended policy went some way to address this concern, and the Council commissioned an updated Gypsy and Traveller Needs Assessment (GTNA)<sup>111</sup>. The GTNA identifies a requirement for 16 permanent pitches up to 2029. The modifications to the policy and explanatory text, to include provision for permanent and temporary pitches **[MM57-62]**, bring the Plan into line with national planning policy<sup>112</sup>.

206. The Plan also sets out a requirement for pitch provision on the four largest allocations (SS3.9-East of Basingstoke; SS3.10-Manydown; SS3.11-Golf Course; and SS3.12-Hounsme Fields), which would allow the Council to meet the GTNA requirement, whilst not ruling out G&T provision on other sites. Objections to these locations for G&T accommodation are based on concerns that only greenfield sites have been identified in the Plan for this purpose, rather than PDL. A preference is also expressed for one larger site where, it is argued, there would be economies of scale associated with site management.

207. However, the only alternative site for G&T accommodation suggested at the Examination was at Peak Copse, close to junction 7 on the M3. This site previously suffered from difficult management issues and has been closed by HCC. Consequently this site is not considered available in order to make provision for G&T pitches. The Council also indicated at the Hearings that in its experience, large sites, such as Peak Copse, are not successful in management terms; and that smaller sites tend to integrate better with the settled community. I agree with the Council that the positive preparation of small G&T sites within the four largest greenfield allocations, to be established at the outset, is a sustainable approach which is also justified in terms of management and integration of G&T provision with the settled community.

208. I consider that policy CN5, subject to the above modifications, together with site allocation policies SS3.9, SS3.10, SS3.11 and SS3.12, demonstrates positive preparation of the Plan; policy CN5 is also justified, effective and complies with national policy.

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<sup>109</sup> SCG between BDBC and Home Builders' Federation (HBF) regarding Enhanced Accessibility and Adaptability Standards; 30 October 2015 [Examination Document PS/05/10].

<sup>110</sup> PPG Ref ID 56-008-201650327 *What accessibility standards can local planning authorities require from new development?*

<sup>111</sup> Opinion Research Services: Basingstoke and Deane – Gypsy and Traveller Needs Assessment: Final Report; August 2015 [Examination Document PS/02/37].

<sup>112</sup> DCLG: Planning policy for traveller sites; August 2015.

### *Other specialised housing matters*

209. The Plan recognises the increasing number of older people (65 years plus) living in the Borough, which is forecast to increase by approximately 60% over the plan period. Policy CN4 provides a framework to support the delivery of specialist accommodation to meet the needs of older residents and those with a disability. The modifications to the policy and explanatory text, to clarify criteria in relation to access to facilities and to state that the Council will require AH on all such developments that fall within Use Class 3 (sheltered and retirement housing) or an equivalent value financial contribution **[MM55 and 56]**, provide clear guidance. Policy CN4, subject to the above modifications, is justified and accords with national policy.
210. Student housing is not a strategic matter for Basingstoke and Deane, as there are no universities or similar institutions in the Borough, either at present or envisaged during the plan period. A modification to policy CN3, to refer to the use of planning conditions and Building Regulations **[MM54]** reflects national policy on securing increased adaptability to enable people to stay in their homes as their needs change. Another modification **[MM51]** amends the policy to encourage self-build in accordance with national policy. Policy CN3, subject to the above modifications, is sound.

### *Regeneration*

211. There are concerns that the housing provision in the Plan linked to regeneration schemes is aspirational and unlikely to materialise in the foreseeable future. The Council's evidence points to an average completion rate of 33 dpa from large scale regeneration projects over the last 14 years<sup>113</sup>. On this basis, I consider that the Council's figure of 200 units to be completed over the remainder of the plan period is a conservative estimate, which could easily be exceeded. The emphasis on regeneration schemes in the Plan is positive in terms of sustainable development.
212. The Council considers that the broad locations which have been identified as suitable for regeneration schemes are likely to come forward after the first five years and have therefore not been included within the Council's five year HLS estimate. For these reasons I consider that the regeneration allowance in the Plan is realistic.

### *Housing in the countryside*

213. Policy SS6 sets out the criteria for new housing outside settlement policy boundaries, including the re-use of PDL, and responds to the requirement to recognise the intrinsic character and beauty of the countryside in paragraph 17 [5] of *the Framework*. The modifications **[MM43-45]** remove the criterion relating to a requirement for the support of the local parish council, which is contrary to national planning policy, and set out clear criteria for small scale residential proposals, i.e. four dwellings or fewer; they also link the policy to NP allocations and local need. Policy SS6, subject to these changes, is justified and accords with national planning policy.

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<sup>113</sup> See SHLAA: Version 10, page 24; August 2015 [Examination Document PS/02/44].

### *Landscape and other constraints to development*

214. Policy EM1 sets out the landscape protection framework for the Borough, which is largely rural in character. 30% lies within the North Wessex Downs AONB, and much of the countryside elsewhere is valued by local residents. Therefore, a strong landscape protection policy for the Borough, which requires development to respect, enhance and avoid being detrimental to the character or visual amenity of the landscape, is justified.
215. Concerns are expressed that the policy lacks the necessary detail in relation to landscape capacity and that it should be more flexible. Others consider that the policy is too permissive and needs to be 'strengthened', i.e. it should be even more restrictive on development. I consider that the policy is set at a relatively high, strategic level and sets an appropriate balance for the Plan to achieve its purpose of protecting the Borough's landscapes from inappropriate development.
216. Some flexibility is included in the policy in terms of accommodating development needs. In response to the need for developments such as class B8 (storage and distribution), the policy needs to be read alongside the modified policy EP1, which I deal with under Issue 3 below. The policy also needs to be read alongside policy SS4, which provides for 'intervention mechanisms' to ensure that water quality is acceptable. This could apply to critical infrastructure developments, such as any further improvements to Basingstoke (Chineham) STW, a point which was raised at the Hearing sessions.
217. Policy EM2 identifies five strategic gaps between existing settlements where development will only be permitted where it would not diminish visual separation, compromise the integrity of the gap or where the land is proposed through the NP process. Three of these gaps separate Basingstoke from Oakley, Sherborne St John and Old Basing; one separates Basingstoke/Chineham from Bramley/Sherfield-on-Loddon; and one separates Tadley from Baughurst. These strategic gaps are supported by the National Trust, most local residents and some of the house builders, except where they are promoting omission sites within these gaps.
218. The Council's topic paper<sup>114</sup> underlines the strong community support for the policy and argues that these gaps help safeguard local distinctiveness, help deliver the spatial strategy of the Plan and prevent coalescence where the risk is greatest. The paper also states that the principle of strategic gaps is supported by paragraph 17 [5] of *the Framework*. Although *the Framework* does not specifically refer to strategic gaps, either in paragraph 17 or elsewhere, a recent High Court Judgment (HCJ)<sup>115</sup> underlines their legitimacy, provided such policies are focused and do not act in the role of what I would term 'blanket ban policies' to protect all rural areas outside settlement boundaries. This recent HCJ states that: "*policies designed to protect specific areas or features, such as the gaps between settlements...could sensibly exist regardless of the distribution of housing and other development*".

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<sup>114</sup> BDBC: Strategic Gaps Topic Paper; October 2014 [Examination Document TP03].

<sup>115</sup> High Court Judgment between South Northamptonshire Council (claimant) and Secretary of State for Communities and Local Government, Barwood Land and Estates Ltd (defendants) – in particular paragraph 47: Ref [2014] EWHC 573 (Admin); 10 March 2014.

219. On the basis of the above considerations, including case law, I consider the policy to be sound. I also note that the principle of safeguarding the settings of villages and heritage assets has been included in the SS3 policies for the main housing allocations, which is a proper application of positive preparation in these areas. Although there are concerns over the specific boundaries of certain parts of the strategic gaps, I am satisfied that, as defined in the Policy Maps, they achieve the strategic aims of the Plan and prevent coalescence of the settlements involved. No changes are therefore needed in the interests of soundness.

220. Policy EM3 seeks to conserve part of the 5 km buffer zone connected to the Thames Basin Heaths Special Protection Area, in accordance with the EC Birds Directive. This policy is supported by NE and other nature conservation groups. There are some requests for increased flexibility in the policy, but no specific changes were suggested, and I therefore consider the policy to be sound.

### *Issue 2 - Conclusion*

221. Subject to the above modifications, I conclude that: the Plan's housing requirement, based on its OAN, its distribution of housing and its treatment of particular types of housing, including AH, is positively prepared and justified; its housing delivery, both over the next 5 years and throughout the plan period, is effective; and its housing policies and provision are consistent with national policy.

### **Issue 3 – Is the Plan's framework for the economy, including policies for the provision of employment land, town centre regeneration, retailing and offices, appropriate to meet the needs of Basingstoke and Deane?**

*Are the expectations in the Plan for employment growth soundly based on a coherent framework?*

222. The Plan aims to maintain and enhance the Borough as a prosperous economic centre and support sustainable economic development. This links in with the aims of the Local Economic Partnership (LEP), which stated: "*Enterprise M3 is satisfied that the emerging Local Plan provides a comprehensive strategy and policy context to allow Basingstoke to continue to play a pivotal role in the economic prosperity of the M3 corridor*"<sup>116</sup>.

223. The evidence base of the Plan includes the Housing Needs Statement (HNS) and the Employment Land Review (ELR)<sup>117</sup>. The ELR sets out three scenarios of future employment floorspace for the period to 2029. The Cambridge Econometrics Local Economy Forecasting Model predicts job growth of approximately 700 jobs pa over the plan period (13% jobs growth over the period 2011-2029) and there is a strong correlation between this forecast and the Enterprise M3 LEP Partnership's goals for expanding the local economy. It is primarily based on employment, as opposed to residents in employment, and assumes that additional economic growth would come from increased demand. Its findings are generally supported by the Oxford Economics Model,

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<sup>116</sup> Enterprise M3 Local Economic Partnership: Response to the Proposed Main Modifications to the Submission Local Plan 2-11-2029; 22 June 2015 [Examination Document PS/03/36].

<sup>117</sup> BDBC: Employment Land Review (ELR); February 2014 [Examination Document ETC01].

which identifies a requirement for 772 jobs pa (15% jobs growth 2011-2029), which amongst other variables, assumes a higher migration rate into the Borough<sup>118</sup>.

224. The third scenario is the Experian Model, which is quoted by some of the house builders' representatives. It identifies a growth of 1,382 jobs pa (25% jobs growth 2011-2029). The HNS explains why it considers that the Experian forecast could over-estimate the amount of jobs that are likely to be generated in the Borough over the plan period. In brief, this is because it is based on a 'shift-share' model which works on a top-down basis with labour demand forecasts which are known to be less robust during periods of economic stability and for long term projections (10 years or more). Experian also projects a lower unemployment rate than the other projections. Finally, the demographic modelling carried out by Edge Analytics generates a job growth of 446 pa, although these figures appear to play down economic activity rates in the over 64 years cohorts<sup>119</sup>.
225. For all of the above reasons, I consider that the Cambridge Econometrics method, which is used by HCC, is appropriate for the Plan. It is very well respected, and Regeneris, on behalf of one of the house builders, states that the HCC analysis: "*is based on data from a highly respected, independent forecasting house (Cambridge Econometrics)*"<sup>120</sup>.
226. The ELR Update<sup>121</sup> sets out a jobs growth target for the Borough, which was introduced to the Plan following the Exploratory Meeting. Using the Cambridge Econometrics model, it indicates that the local economy may grow at around 2.5% pa over 2011-2029, with productivity rates higher than the regional and national rates and the number of jobs is estimated to grow at an annual rate of 0.7%, which is equivalent to 700 jobs pa, with the strongest growth projected between the years 2016-2021. The main growth areas are predicted to be in financial and business services, construction, accommodation and food services and information/telecommunications<sup>122</sup>.
227. Policy EP1 incorporates a jobs target of 450-700 jobs pa, which the Council considers appropriate in response to past trend data (based on analysis of job growth findings from the Annual Business Enquiry and Business Register and Employment Survey), which supports the lower end and middle of the range, and economic forecasts which support the upper end of the range. The upper end of the target also accords with the goals of Enterprise EM3 LEP for the growth in the local economy. The Council's HNS also explains how the jobs target range is compatible with the demographic modelling produced by Edge in relation to OAN.
228. The relatively wide range is considered appropriate in view of the high volatility of the data at local level<sup>123</sup>. I am satisfied that the Borough's jobs

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<sup>118</sup> Ibid: Appendix 7.

<sup>119</sup> BDBC Cabinet Report: Local Plan Housing Numbers; 27 January 2015 - See Section 5 Employment Target [Examination Document PS/02/11].

<sup>120</sup> Gladman Developments Ltd: Statement on Issue 3 - Spatial Strategy and Housing Need, paragraph 4.5.2; 11 September 2015 [Examination Document PS/04/18/c].

<sup>121</sup> BDBC: Employment Land Review (ELR) Update; May 2015 [Examination Document PS/02/23].

<sup>122</sup> Ibid: Appendix A - HCC Economic Growth Forecast for Basingstoke and Deane; April 2015.

<sup>123</sup> BDBC: Housing Needs Statement, section 5 Future Jobs [Examination Document PS/02/47].

target is supported by the evidence as well as reflecting the Government's growth agenda.

*Is the employment strategy in policy EP1 and the employment provision in policy EP2 sufficient to meet the Borough's employment needs over the plan period?*

229. These policies set out which areas are appropriate for what types of employment land. They refer to existing strategic employment sites; allocating appropriate new employment sites through a subsequent development plan document (DPD); permitting employment uses in the strategic housing sites at Manydown and the Golf Course sites; and supporting various key employment sectors (e.g. finance and business).
230. The ELR Update shows that there is potential for office jobs to increase over the plan period and that this can be accommodated by the existing underutilised office spaces. A recent LEP Market Study showed a vacancy level of 144,015 sm in 2013<sup>124</sup>. Its overall assessment is that supply is exceeding demand<sup>125</sup>. The change in permitted development to allow for the conversion of office space to residential use is starting to have some effect and it remains to be seen how much office floorspace will actually be lost via this mechanism; the Council needs to keep close eye on this. In addition, the Plan proposes the high quality redevelopment of Basing View, to include offices, which I consider in more detail below. Finally, there is scope for neighbourhood plans (NPs) to allocate employment land, and the Whitchurch NP is considering this option.
231. In view of the high vacancy rate shown in the LEP Market Study, there is some scope for the manufacturing sector to meet the modest potential increase in demand identified in the ELR Update, certainly in advance of an Employment Sites DPD which the Council intends to start work on as soon as this Plan is adopted<sup>126</sup>.
232. Concern was expressed that the Plan fails to allocate employment land, and in particular that the market demand for storage and distribution is not met, a point also made in the ELR<sup>127</sup>. In relation to the need for land for storage and distribution (Use Class B8), Basingstoke is ideally placed on the M3, with good access to airports such as Gatwick and Southampton and seaports such as Southampton. It is also well related generally to the trunk road network, for this to be a key opportunity in the Plan. I therefore consider that waiting for a future DPD to allocate a site for this sector undermines the effectiveness of the Plan and furthermore, could put off potential investors with a contribution to make to the local economy.
233. The modifications to policy EP1 [**MM79** and **80**] overcome this soundness issue. They indicate support for development proposals for storage and distribution floorspace, outside the existing Strategic Employment Areas, in

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<sup>124</sup> Enterprise M3-Commercial Property Market Study; April 2013 [Examination Document ECT04].

<sup>125</sup> Ibid: Conclusion-short term, page 52.

<sup>126</sup> Expected date of adoption for the Employment Sites DPD is March 2017, although this timetable will presumably be reviewed following the delay in the Plan I am examining - see paragraph 2.7 of the Local Development Scheme (LDS); September 2014 [Examination Document BD01].

<sup>127</sup> BDBC: Employment Land Review (ELR) Update - paragraph 1.1.10, page 5; May 2015 [Examination Document PS/02/23].

advance of the above-mentioned DPD, subject to criteria including landscape impact, compatibility with residential properties and access considerations.

234. Further representations are submitted in favour of expanding the types of development covered by the above modifications to cover the development of additional sites for industrial and campus style B1 office uses in advance of a subsequent DPD. However, I have already referred to the large amount of vacant office and industrial floor space which already exists in the Borough. In addition, paragraph 23 of *the Framework* points to a 'town centre' first strategy which should be followed by local plans, with the next sequential requirement being to consider edge-of-centre locations where there is suitable and viable capacity; policy SS8 does this by promoting the Basing View site as a high quality strategic employment site, including office provision. For these reasons, I do not consider further changes to these modifications (MM79 and 80) are required for soundness.

*What is the likely role of the strategic employment areas identified in the Plan?*

235. There are 16 strategic employment areas identified in the Plan, and I consider that their role is vital to the local economy. It is recognised, however, that there are several vacant office buildings and employment sites in the Borough. The requirements of paragraphs 21 and 22 of *the Framework*, and especially the need to avoid long term protection of employment sites, mean that there is need for flexibility to avoid such sites remaining vacant for long periods. This is especially important when other proposals for their constructive use are being made. Policy EP2 therefore applies a market test to indicate that the site is unsuitable for future employment uses, with the requirement that sites will need to have been marketed at a reasonable value for at least six months, with no interest from prospective buyers/tenants.

236. I consider this is an appropriate balance between safeguarding existing employment land and providing the flexibility necessary for the market to respond to commercial considerations. This is not unduly onerous, especially when it is considered that employment sites, once lost, are much more difficult to replace than many less environmentally challenging uses.

*Is the Basing View regeneration strategy justified and realistic?*

237. Basing View, situated immediately to the east of Basingstoke town centre, is strategically located for business accommodation. Policy SS8 seeks to regenerate Basing View as a high quality strategic employment site. The modifications to the policy and explanatory text, in accordance with the SCG between the Council and the potential developers<sup>128</sup>, identify three sub-areas (Downtown, Midtown and Uptown) and a range of uses appropriate for each of these areas. They are also identified on an Inset Map. These modifications **[MM46 and 47]** provide the appropriate level of detail required by paragraph 157 of *the Framework* and flexibility for such a key central site in the town. The increased mix of uses includes approximately 300 dwellings and retail, hotels, restaurants and other, community based uses, in what is planned to be

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<sup>128</sup> SCG between the Council and Muse Developments: Policy SS8 Basing View; August 2015 [Examination Document PS/02/39].

a diverse and vibrant development, to complement the primary B1 employment role.

238. The scheme aims to strike a balance between a 'laissez faire' policy and a focus on bringing about high quality regeneration in a well located if challenging site. The additional wording in the above modifications, together with the Inset Map, including the subdivision of the site and parameters for each sub area, sharpens the focus of the policy and provides sufficient guidance for the Plan to be clear and effective.

*Does the Plan strike an appropriate housing/employment balance?*

239. I have already concluded that the Borough is relatively self-contained<sup>129</sup>. It is now necessary to consider whether the Plan provides a framework to achieve an appropriate housing/employment balance in the Borough. Although no major employment sites are proposed prior to the forthcoming Employment Sites DPD, it has already been established that there is considerable capacity in the Borough's existing employment areas to accommodate new employment generation. Moreover, there is commitment in the modified policy EP1 for support for new storage and distribution employment on additional sites.

240. There is also potential for additional employment in some of the major expansion areas, such as Manydown, as well as in Basing View. An important point is also made by the Council that many forms of employment do not rely on employment land provision; these include home working, increased employee densities and many jobs in the service, office, retail, health, education, leisure, tourism and the community sectors.

241. Will the framework for employment fit closely with the Plan's housing requirement of 850 dpa? The HNS in its section on future jobs, states that based on an OAN of 850 dpa, "*homes and jobs are likely to be in broad alignment and that the housing figure is unlikely to constrain job growth*"<sup>130</sup>. The relationship between homes and jobs is complex and the Plan cannot control the work and housing choices and individual residents and employers/employees; what it can do, however, is set a sustainable framework which enables a high proportion of residents to live and work in the Borough if they wish to do this and contain the pressures to commute outside the Borough. For the reasons I have explained, I consider that the Plan's objective stands a realistic chance of delivery.

*Is the Plan's approach to retail and office growth in the town centre and other district and local centres consistent with national policy?*

242. In accordance with the requirements of paragraph 23 of *the Framework*, policy EP3 clearly identifies the town/district/local centre boundaries and the primary and secondary shopping frontages. It also provides strategic direction on which uses are appropriate in such locations. The town centre boundaries in this Plan are extended along with the range of uses, such as offices and leisure uses, which I support on the grounds of increased flexibility and responsiveness to changing market demands and consumer expectations.

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<sup>129</sup> See above, Issue 2, section on most appropriate HMA for Basingstoke and Deane.

<sup>130</sup> HNS, paragraph 5.3.4 [Examination Document PS/02/47].

243. The supporting text is modified to provide the most up-to-date comparison (28,000 sm) and convenience (3,000 sm) figures for retail capacity **[MM81]**, in the interests of clarity and the effectiveness of the Plan.

244. Policy EP3 sets a relatively low threshold of 250 sm net floorspace for edge-of-centre locations, to gauge whether they would have a significant adverse impact on existing centres. This is significantly below the 2,500 sm level set in the PPG<sup>131</sup>. The PPG, however, makes allowances for locally appropriate thresholds. The Plan states that the lower threshold is considered necessary as the Borough's smaller centres are generally more vulnerable to proposals for smaller format stores in edge- and/or out-of-centre locations. The Plan's lower threshold provision is therefore not a soundness issue.

*Is the approach of the Plan to the Basingstoke Leisure Park justified and realistic?*

245. Policy SS9 strikes a balance between focus and flexibility to ensure that the leisure park, which is located outside any of the defined town or district centres, is retained as one of the Borough's prime leisure destinations. The policy states that any new retail uses must be ancillary to the primary use for leisure and that the vitality and viability of defined centres should not be compromised. The policy is not unduly restrictive and on this basis there is not a soundness issue.

*Are the Plan's policies for the rural economy and tourism justified and effective?*

246. Policies EP4 and EP5 establish a sustainable framework to encourage the rural economy and tourism. The modification to policy EP4 **[MM82]** to introduce an additional criterion for support for small-scale new businesses, to ensure they are not in an isolated location, is necessary to achieve the sometimes difficult balance between facilitating a thriving rural economy and recognising the intrinsic character and beauty of the countryside.

### *Issue 3 - Conclusion*

247. I conclude on the evidence before me that the Plan's economic strategy and policies for economic and employment growth, strategic employment areas and the regeneration of Basing View, together with its framework for retail, office and other developments in the town, district and local centres, are, subject to the above modifications, positively prepared, justified, effective and in accordance with national policy.

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<sup>131</sup> PPG Ref ID: 2b-016-20140306 *When should the impact test be used?*

## **Issue 4 – Is the infrastructure needed to accommodate the Plan's strategy positively prepared, justified and deliverable within the plan period?**

### *Waste management*

248. The Hampshire Minerals and Waste Plan (HMWP) was adopted in 2013<sup>132</sup>. It forms part of the development plan for the Borough. There is therefore no need to identify or safeguard waste management sites within this Plan. Section 6 of the HMWP sets out a clear strategic framework for sustainable waste management, including the requirement to promote sustainable construction, which is also promoted in policy EM10 of this Plan. Policy 26 of the HMWP also provides for the safeguarding of waste infrastructure on a number of sites, some of which are located within the Borough.

249. There is no need for this to be duplicated in the Plan before me.

### *Flood Risk*

250. Policy EM7 provides a framework for minimising flood risk and steering development away from vulnerable areas affected by flooding. This policy has been formulated on the basis of consultation with a range of stakeholders, including the EA, Thames Water, South East Water and Southern Water, all of whom support the policy. It is also informed by the Council's Flood Risk Assessment<sup>133</sup> and Water Cycle Study<sup>134</sup>. The policy highlights the importance of incorporating sustainable drainage systems (SuDS) in new developments, and the modification to policy EM7 **[MM69]** ensures that the Plan is compliant with Government policy in this regard.

### *Infrastructure Delivery*

251. Policy CN6 and the Infrastructure Delivery Plan (IDP) aim to provide the necessary guidance to enable the successful implementation of the Plan. The IDP is referred to as a 'living document' which is regularly revised and updated, the most recent version being in May 2015<sup>135</sup>. It includes the views of service providers and reviews recent funding and grant allocations. The IDP also draws on the work of the viability studies commissioned by the Council. As explained above, the added complexities of the Manydown and south-west Basingstoke allocations will be managed through an Infrastructure Development Strategy (IDS), to be required to accompany each planning application in these allocations (see MMs 24 and 32).

252. Policy CN6 sets out the principles for infrastructure funding of schemes including phasing and the use of Section 106 and Community Infrastructure Levy (CIL) funding where appropriate. Policies SS3.1-12 also identify the key infrastructure requirements of the greenfield site allocations in the Plan.

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<sup>132</sup> Hampshire Minerals and Waste Plan (2011-2030) [Examination Document PS/02/45].

<sup>133</sup> BDBC: Strategic Flood Risk Assessment for Local Development Framework; Final January 2010 [Examination Document ENV05].

<sup>134</sup> Halcrow: Basingstoke Water Cycle Study: Phase 2 Water Cycle Study Report; October 2009 [Examination Document [ENV06].

<sup>135</sup> BDBC: Infrastructure Delivery Plan Addendum; May 2015 [Examination Document PS/02/20].

253. Concerns were expressed over previous shortages of infrastructure funding in the Borough and the relatively low proportion of any spending gap that is to be covered by CIL, together with the importance of mitigation. Linked to these comments is the view that the "*sums don't add up*". The Council in its response cites its viability assessments and its recent record of securing infrastructure funding, for example from the LEP and Section 106 Agreements. A modification to policy CN6 **[MM63]**, which states that site specific mitigation measures will be secured by planning obligations, addresses a key aspect of this delivery point. I also note that the funding gap in Basingstoke and Deane is significantly lower than in several neighbouring authorities.

254. On balance, I am satisfied from the written evidence and the answers given at the Hearings that the development proposals in the Plan are realistic in terms of existing funding provision and likely future funding sources. This view is shared by the LEP and HCC, both of whom state they work closely with the Council, in addition to the utility companies and other major infrastructure providers, as well as the promoters of the major development sites and schemes in the Borough. There is a general air of confidence from all the key infrastructure providers that the Plan is deliverable within the plan period.

255. A key question is: which schemes are 'showstoppers', i.e. critical to the successful implementation of the Plan? In response, the IDP identifies three classes of infrastructure, i.e. essential, necessary and desirable. There are a limited number of essential schemes, which I consider are key to the implementation of the Plan. These fall into four broad categories:

- Flood risk/drainage schemes, coordinated through the EA, which is supporting the Plan;
- Major site access through HCC, which does not envisage any funding or logistics problems;
- Strategic road improvements through HCC, which does not envisage funding shortages, although the use of DCLG funding and S106/S278 Agreements are envisaged, which is confirmed through a Position Statement<sup>136</sup>; and
- Waste water treatment through Southern Water/Thames Water, which accept that the quantum of development can be accommodated, with confirmation through a SCG<sup>137</sup>, a position reaffirmed in correspondence with Southern Water<sup>138</sup> and Thames Water<sup>139</sup>.

256. In addition to the above, the LEP has provided funding for a number of highway schemes, including improvements to the A33 corridor and the A340, plus the roundabouts on the A30 at Thornycroft and Winchester Road. The LEP's commitment to the Plan and its infrastructure is set out in its letter to the Council<sup>140</sup>.

257. Policies CN7 and CN8 provide a robust framework to support a broad spectrum of facilities and services, and for considering proposals for change of use.

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<sup>136</sup> BDBC: Transport Assessment Position Statement; April 2015 [Examination Document PS/02/29].

<sup>137</sup> SCG between EA, Thames Water and BDBC – Local Plan Policies SS4 – Ensuring a supply of deliverable sites; and EM6 – water quality; August 2015 [Examination Document PS/02/38].

<sup>138</sup> Correspondence between BDBC and Southern Water regarding Infrastructure Provision (4 letters dated 29/10/14; 28/10/14; 03/06/13; and 25/11/11) [Examination Document PS/02/01].

<sup>139</sup> Correspondence between BDBC and Thames Water regarding Infrastructure Provision (E-mail dated 28/10/14; and letter dated 26/02/13) [Examination Document PS/02/02].

<sup>140</sup> Letter from Enterprise M3 LEP to BDBC; 18 August 2015 [Examination Document PS/04/01h, Appendix A].

### *Nuclear Installations*

258. Policy SS7 requires development in the land use planning consultation zones surrounding the atomic weapons establishments (AWEs) at Aldermaston and Burghfield to be managed in the interests of public safety. This has implications for the settlement of Tadley (population 11,650), which is the second largest town in the Borough. It is located within the Inner Detailed Emergency Planning Zone which extends to 3 kilometres from the perimeters of these establishments. Tadley does not have any strategic development allocations in the Plan. The Office for Nuclear Regulation (ONR) considers that policy SS7 provides an appropriate mechanism for considering proposals in proximity to the two AWE sites.
259. The town of Tadley is sustainable in terms of its services and facilities to serve the needs of a modest increase in its population, and it has existing development needs of its own. The town is also experiencing slight depopulation, which is having a minor adverse effect on its services and facilities. I also read and heard evidence that the risk of radiation incidents and other hazards from the AWEs on the inhabitants of the town of Tadley is extremely low<sup>141</sup>.
260. A view is expressed that the presence of the AWEs is not an overriding reason to exclude Tadley from housing allocations in the Plan, a point reinforced by citing two planning decisions, one of them recent, which allowed a combined increase of 151 dwellings in the town<sup>142</sup>. However, I understand that these planning permissions have been the exception to the recent planning history in Tadley, with most applications for residential development being refused.
261. In view of the complexities involved, I requested a Position Statement<sup>143</sup>, which was written by the Council with the involvement of the ONR and the Civil Contingencies and Planning Departments of West Berkshire Council, where the two AWEs are located. This Statement emphasises the importance of protecting the health and wellbeing of the community in the area around the AWEs with respect to nuclear safety, and in particular in the event of a radiation emergency. It states that during the DTC on-going discussions, there was all party agreement that further development within the Detailed Inner Emergency Planning Zone should not be supported.
262. The policy provides for some flexibility in Tadley for minor applications, but the view of West Berkshire Council, who co-ordinate the Off-site Emergency Plan, is that the Tadley area is now 'full' with an already significant impact on the responders to any incident, but particularly a radiation emergency. Even with the excellent management of the AWEs and the associated low probability of nuclear related incidents, the need to apply the precautionary principle is clearly a significant material consideration.

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<sup>141</sup> WSP/Parsons Brinckerhoff: AWE-An Evaluation of the degree to which potential accidents with off-site radiological consequences occurring at AWE Aldermaston are a material consideration in defining the overall future pattern of development of Tadley, for Bloor Homes; September 2015 [Examination Document S/04/04c].

<sup>142</sup> Boundary Hall (BDB/67609) for 115 homes, decision referred to Secretary of State in 2011; and Burnham Copse School (14/02200/OUT) for 36 homes in February 2015 [para 2.4 of Examination Document PS/05/MMF9].

<sup>143</sup> BDBC: Position Statement on SS7 – Nuclear Installations; October 2015 [Examination Document PS/05/MF9].

263. In the light of the above considerations and the full discussion at the Hearings, I consider that policy SS7 is justified in principle and that it contains an appropriate level of flexibility. It would therefore be inappropriate to allocate a strategic allocation in the Plan at Tadley. As such, the policy accords with paragraphs 172 and 194 of *the Framework* and the requirement in the PPG to "have regard to the prevention of major accidents and limiting their consequences"<sup>144</sup> and the general advice in the PPG with regard to development around nuclear installations<sup>145</sup>. Whilst I note the arguments in favour of allocating housing sites in Tadley, policy SS7 does not rule out small scale organic growth. Neither does it rule out a NP for Tadley at some point in the future, although the safety arguments expressed in national policy are in my view paramount.

#### *Issue 4 - Conclusions*

264. I conclude on the evidence before me that the provisions of the Plan, including the relevant policies and the IDP, subject to the above modifications, set a sustainable and realistic framework so that the infrastructure needed to ensure the deliverability of the Plan is in place or can be achieved at the appropriate time within the plan period. The relevant policies also secure the safety and wellbeing of the population from risks associated with flooding or incidents related to the neighbouring AWEs.

#### **Issue 5 – Is the capacity and quality of the existing and proposed transport network sufficient to accommodate the scale and distribution of growth planned for Basingstoke and Deane over the plan period?**

##### *Does the Plan provide a strategic focus for transport schemes in the Borough?*

265. Policy CN9 sets out the Council's approach to transport provision in the Borough. It is based on a Transport Assessment (TA)<sup>146</sup>, which has been endorsed by HCC<sup>147</sup>, who regard it as fit for purpose and "the best methodology available at the time". It is sufficiently robust to assess the impact of development on the highway network, including junctions, which would result from the implementation of the Plan.

266. The TA identifies the mitigation schemes required at key sections of highway, including the A33 corridor to the north-east of the town of Basingstoke and a number of junctions on the A30 in the south-west of the town. It also indicates the programming of these schemes and their funding status, noting that in all cases, actual or provisional funding has been agreed. The effectiveness of this document is reinforced by SCGs with individual landowners, whilst the transport provisions of the Plan also link in closely with the Local Transport Plan (LTP). I consider that this level of resource allocation and undertaking to commit resources from the major funding parties is sufficient to underpin the deliverability of the key parts of the highways

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<sup>144</sup> PPG Ref ID: 39-002-20140306 *How does the planning system deal with hazardous substances?*

<sup>145</sup> Ibid 39-075-20140306 *What about development around nuclear installations?*

<sup>146</sup> Parsons Brinckerhoff: Basingstoke Local Plan 2014-2029 Transport Assessment (TA); February 2015 [Examination Document PS/02/32].

<sup>147</sup> Position Statement on the Transport Assessment to Support the Draft Basingstoke and Deane Local Plan 2011-2029; July 2015 [Examination Document PS/02/29].

infrastructure which are necessary to secure the Plan's strategic provision of housing and other development during the plan period.

267. The modifications to policy CN9 and supporting text **[MM64 and 65]** refer to partnership working to secure a number of sustainable transport outcomes, including coherent pedestrian and cycling networks, providing greater detail and demonstrating it has been positively prepared. These modifications reflect national policy, expressed in Section 4 of *the Framework*, to promote sustainable transport. I therefore consider that policy CN9, as modified, provides for sustainable transport provision in Basingstoke and Deane.

*Is the Infrastructure Delivery Plan (IDP) sufficiently focused on the key transport issues, including when, how and by whom they will be delivered?*

268. The IDP provides a detailed list of schemes which are required to address the key transport requirements of the Plan. I consider that this 'high level' framework provides sufficient strategic direction to enable schemes in the TA to be delivered successfully within the plan period.

269. Particular concern focuses on whether the highways infrastructure would be put in place to enable the strategic greenfield developments at Manydown, Golf Course and Hounsome Fields, especially given the size of the infrastructure gap. The Council's response to this issue<sup>148</sup> identifies a total cost of £36.5 million, of which £19.5 million remains unfunded. However, the TA has been prepared on the basis of a 'worst case' scenario, involving mitigating the impacts of development throughout the plan period, therefore with 2029 as the end date.

270. The Council's response identifies future sources of funding over the plan period. These include the LEP's Strategic Economic Plan, which as explained in its letter<sup>149</sup>, recognises the importance of Basingstoke to the local economy and LEP support for a package of measures, including highways projects and public transport improvements. Other potential sources include New Homes Bonus; DCLG Large Sites Infrastructure Fund; and CIL. The securing of nearly half of the total funding at a relatively early stage in the plan period, plus clear opportunities for significant amounts of additional funding, indicate to me that the Plan has been positively prepared with a strong likelihood of successful implementation, and that the Plan is therefore effective. Moreover, there will be a requirement for scheme developers to provide the necessary mitigation in terms of highway improvements.

271. I have addressed some of the other strategic transport aspects of the Plan earlier in this report, in connection with the Manydown allocation. These include the deleted long-term western bypass proposal (MM28), and the improved Five Ways Junction at Kempshott.

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<sup>148</sup> BDBC: Transport Infrastructure Gap in South-West Basingstoke - Clarification of Position; 30 October 2015 [Examination Document PS/05/MF25].

<sup>149</sup> Ibid: Appendix 2 - Letter from Enterprise LEP to BDBC; 18 August 2015.

*Are parking and access issues, especially in the town centre, properly addressed in the Plan?*

272. Policy CN9 links to the Council's adopted parking standards, which I consider are at the appropriate level of detail and not contrary to the requirements of paragraph 40 of *the Framework*. Further guidance on accessibility to the town, and particularly the centre, is found in HCC's Town Access Plan<sup>150</sup>. The adopted Cycling Strategy, which the Council prepared in partnership with Sustrans<sup>151</sup>, will also address access issues. A modification [MM66] provides the appropriate level of detail on the Strategic Cycle Network in the explanatory text, in accordance with Section 4 of *the Framework*, to promote sustainable transport.

*Does the Plan provide a robust strategy for public transport, including new rail stations?*

273. Policy CN9 as modified (see MM64 above) provides an appropriate framework for the improvement of public transport in the Borough, and it is strengthened by the specific requirements in the relevant policies for strategic sites to ensure adequate bus access. This also links in closely with the TA and LTP.

274. A new rail station is proposed at Chineham (policy SS10) and a new station car park is proposed for Whitchurch (policy SS11). There is still an element of uncertainty associated with these policies, and it is necessary to consider whether the Plan strikes the right balance between aspiration and effectiveness, in line with the requirements of paragraph 154 of *the Framework*. Although doubts were expressed over the likelihood of the new station being built over the plan period, it is clear that there is strong support from the rail industry, HCC and the LEP<sup>152</sup>. Detailed costings have been prepared and the site for the station has been secured through a Section 106 Agreement. Future funding sources include the Department for Transport's New Station Fund.

275. Concerns were expressed that the station proposal is in the wrong location. I note the Council's response that it is the only available site, despite its compact size and necessity for some woodland clearance. No alternative sites were put forward for consideration at the Examination.

276. The proposed electrification of the railway is part of the Great Western Electrification Programme, which is a committed national project. This will speed up train movements, creating additional capacity on the Basingstoke to Reading line. There are still issues to be resolved, such as whether the increased movements of freight trains using the line as part of the route from Southampton to the Midlands would be compatible with the increased stopping of passenger trains, both at Chineham and the proposed new station at Reading Green Park. This is in addition to the proposed re-routing/new routing of passenger trains from Southampton to London Paddington.

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<sup>150</sup> HCC & BDBC: Basingstoke Town Access Plan; January 2012 [Examination Document TR05].

<sup>151</sup> BDBC: Draft Cycling Strategy; October 2015 [Examination Document PS/04/63].

<sup>152</sup> Ibid: Appendix 3 – Letters of support from Network Rail, Enterprise M3 LEP, HCC and First Great Western; dated August-September 2015.

277. On balance I consider the policy is needed to provide a level of certainty, both to partners in the rail industry and also funding bodies, such as the LEP, who will want assurances that funding will be used to support schemes that are likely to be implemented.

278. The site for the proposed car park for Whitchurch Station is located in the AONB. No alternative sites outside the AONB were put forward with any degree of certainty, and the site is very well related to the existing station. I agree with the Council that the allocation, which is already in the Adopted Local Plan 1996-2011, should be retained to provide a basis for on-going negotiation with the landowner, who has indicated support for the proposal, as has Network Rail.

### *Issue 5 – Conclusions*

279. I conclude from the evidence before me that policy CN9 and its supporting text, subject to the above modifications, establishes a framework to enable the transport network to accommodate the scale and distribution of growth planned for Basingstoke and Deane in a sustainable manner. There is also a realistic prospect of resource availability and delivery, whilst policies SS10 and SS11 for enhanced public transport, strike the right balance between aspiration and effectiveness.

### **Issue 6 – Does the Plan provide a clear framework for managing green infrastructure, and other environmental assets, including climate change?**

#### *Green Infrastructure*

280. Policy EM5 aims to protect and enhance the quality of the Borough's green infrastructure (GI). Policy EM4 provides an integrated framework for conserving and enhancing the Borough's existing biodiversity assets, whilst enabling opportunities to achieve a net gain in biodiversity. Both policies have been informed by the Council's Living Landscapes Plan<sup>153</sup>. They have also been prepared in partnership with EA, NE and other wildlife organisations and in accordance with a SCG<sup>154</sup> which I requested following discussion at the Hearings. The modification to the supporting text **[MM67]** provides more information on relevant Council strategies and emphasises the importance of partnership working, in the interests of the effectiveness of the Plan.

281. A modification **[MM68]** sets out relevant indicators to ensure the effectiveness of the Plan, including a commitment to monitor through an annual Living Landscapes Update. Concerns are expressed over the impact of two residential development allocations – Overton Hill (policy SS3.5) and Land East of Basingstoke (policy SS3.9) – on the natural environment and the effectiveness of policies EM4 and EM5. Both these policies, however, provide a framework for development to avoid or mitigate impact on key species or habitats, partly through the inclusion of appropriate green space and defensive buffers, in line with policies EM4 and EM5.

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<sup>153</sup> BDBC: Living Landscapes-Natural Environment Strategy; 2014 [Examination Document PS/02/08].

<sup>154</sup> SCG between BDBC and Natural Basingstoke regarding Local Plan Environment Policies; 27 November 2015 [Examination Document PS/05/MF 13].

### *Renewable energy*

282. Policy EM8 encourages the provision of renewable energy and low carbon development. It sets a robust framework for the assessment of environmental, social and economic impacts of low carbon and renewable energy generation. It has an evidence base in a Hampshire-wide study<sup>155</sup> which identifies the main opportunities and locations for renewable energy. Modifications to the policy and explanatory text [**MM73** and **74**] reflect the recent WMS<sup>156</sup> which sets out the considerations to be applied to proposed wind energy development, including the need for such developments to have the backing of the affected local community.
283. Several concerns were expressed in relation to the deletion of wind turbines from policy EM8, primarily on the grounds that they are an important contributory factor in moving towards a zero carbon economy by 2050, as agreed by the Government at the recent Paris Climate Change Summit. Some respondents also considered that wind turbines are popular with the community and are an attractive addition to the landscape, although it is clear both locally and nationally that these latter views are not shared by everyone in areas likely to be affected by wind turbines.
284. The WMS referred to above amends the PPG, which now states that it is necessary for local or neighbourhood plans to identify areas suitable for wind energy development<sup>157</sup>. One of the modifications (MM 74) states that the Council intends to identify areas suitable for wind energy development through its Allocations and Settlement Policy Boundary DPD, in accordance with the provisions of the PPG. Parish or town councils may also wish to identify such areas. However, as far as this Plan is concerned, I have not been presented with any proposal by the Council to amend the Plan by identifying areas that are suitable for wind energy development and it is not for me to pre-empt the Council's consideration of this matter in the future.
285. Several modifications [**MM70; 71; 72; and 75-79;**] link the Plan to the national climate change strategy and delete references to the Code for Sustainable Homes (CSH), which are no longer appropriate for inclusion in the Plan following the Government's withdrawal of the Code and transfer of technical standards from Local Plans to new national standards<sup>158</sup>.

### *Climate change*

286. The Council's Climate Change Strategy<sup>159</sup> sets out how the Council is seeking to address local issues relating to climate change. Policies EM8, EM9, EM10 and EM12 in particular contribute towards achieving the aims of the strategy, e.g. through managing carbon emissions, minimising energy consumption, encouraging sustainable water use and tackling pollution. The climate change implications are also considered in the SA. Adaptation to the effects of climate

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<sup>155</sup> AECOM: North Hampshire Renewable Energy and Low Carbon Development Study; March 2010 [Examination Document ENV10].

<sup>156</sup> Written Ministerial (WMS) (HCWS42) by Secretary of State for Communities and Local Government (Greg Clark) on proposed wind energy development; 18 June 2015.

<sup>157</sup> PPG: ID5-005-20150618 *How can local authorities identify suitable areas for renewable and low carbon energy?*

<sup>158</sup> WMS Planning Update from DCLG and The Rt Hon Eric Pickles MP: Planning Update March 2015.

<sup>159</sup> BDBC: Climate Change Strategy for Basingstoke and Deane Borough Council; April 2014 [Examination Document ENV13].

change can be seen in policies EM7 (managing flood risk), EM4 (GI) and EM8 (commercial renewable/low carbon energy). I therefore conclude that the Plan's approach towards climate change and climate change mitigation is justified and accords with national policy.

#### *Water quality and sustainable water use*

287. Policy EM6 seeks to protect, manage and improve the quality of the Borough's water environment. It was pointed out by the HBF that water treatment is the responsibility of the water companies, whom the house builders pay levies to, in order to ensure the water resources are available to meet local needs and who review their plans every 5 years with this end in mind. However, it is clear that water quality is a major concern, and this was raised both at the Exploratory Meeting and also in the Examination Hearings, especially in relation to the increased housing provision in the Plan, following the Exploratory Meeting. The principal focus of concern is the effect of the outflow from the town's sewage treatment works (STW) at Chineham on the water quality in the River Loddon, which has Chalk River status.
288. There are related concerns over abstraction and the level of phosphates in the water resulting from the level of development required by the Plan. The phosphate level in the river is governed by consents, and EA has accepted that abstraction on the River Loddon is a significant challenge. The final paragraph of policy EM6 sets a framework to prevent the deterioration of water quality which could arise through contamination, and this accords with the requirement in paragraph 109 [4] of *the Framework*.
289. The SCG between EA, Thames Water and the Council<sup>160</sup> explains that as part of the work to consider the suitability of an increased housing figure for the Borough, the EA has produced an additional water quality modelling report<sup>161</sup> to determine whether the housing requirement of the Plan of 850 dpa would cause water quality problems.
290. The report states that the results of the modelling show that to avoid deterioration in the River Loddon, a tighter consent of 0.5mg/l would be required at the STW. This is currently deemed to be technically feasible, and therefore the river can be protected. The report concludes by stating that the 850 dpa scenario results "*indicate that there would not be a deterioration in Water Framework Directive status and therefore the impacts would be deemed acceptable by the EA and would not result in any soundness issues being raised in relation to the local plan or its proposed housing figures*"<sup>162</sup>.
291. The report also advocates annual monitoring of river quality, which is included in the Plan, both in relation to policy SS4 and EM6. Although the period of the monitoring was challenged as being insufficiently frequent to be effective, no robust evidence was submitted to demonstrate that annual monitoring would be unacceptable. I therefore find no soundness issues relating to either the

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<sup>160</sup> SCG: between the EA, Thames Water and BDBC – Local Plan Policies SS4 – Ensuring a supply of deliverable sites and EM6 – Water Quality; August 2015 [Examination Document PS/02/38].

<sup>161</sup> EA: Water Quality Modelling Summary: Basingstoke (Chineham) Sewage Treatment Works; February 2015 [Examination Document S/02/28].

<sup>162</sup> Ibid: Conclusions – final page.

impact of the housing provision on river quality or the monitoring arrangements.

292. Policy SS4, which seeks to ensure a five-year supply of deliverable housing sites, states that the Council will resist granting further planning applications where monitoring indicates a likely deterioration of water quality. This is criticised as operating a blanket ban on development, in conflict with *the Framework*. The modifications which delete this phrase and introduce more positive wording bring the policy and explanatory text into line with the presumption in favour of sustainable development [MM38 and 39]. The modifications to policy EM9 and the explanatory text [MM75 and 76], to incorporate increased water efficiency standards, reflect the PPG guidance.

293. A number of respondents consider that there should be further modifications to policy SS4, to delete the word 'likely' before 'deterioration in individual elements band status of the Borough's water bodies', principally on the grounds of adding clarity and certainty, so as to enable the Plan to proactively deliver homes and other development, as required in paragraph 17 [3] of *the Framework*. However, this has to be set against the need for the policy to operate in a precautionary manner, in the interests of conserving and enhancing the natural environment and reducing pollution, as required in paragraph 17 [7] of *the Framework*.

294. On balance, I support the retention of the word 'likely', which enables the necessary action to be taken in advance of potential damage to water quality, as opposed to reacting once damage has already been caused. I therefore consider that no further changes are required to MMs 38 and 39.

#### *Pollution*

295. Policy EM12 sets out the approach to assessing development proposals that are likely to result in pollution or which are sensitive to pollution. This accords with the requirements of paragraph 112 of *the Framework*, and I consider there are no soundness issues in relation to this policy.

#### *Biodiversity*

296. Policy EM3 provides a framework for mitigation in relation to the Thames Basin Heaths SPA. Policy EM4 seeks to protect or mitigate the effects of development on biodiversity or geodiversity. I consider there are no soundness issues in relation to these policies.

#### *The historic environment*

297. Policy EM11 sets out a strategy for conserving the historic environment, following extensive dialogue and support from Historic England and the County Archaeologist. I consider there are no soundness concerns with this policy.

#### *Issue 6 – Conclusion*

298. Taking all the above considerations into account, I conclude that the environmental policies included under Issue 6 are, subject to the above modifications, justified and accord with national policy.

**Issue 7- How does the Plan manage development and deal with uncertainties and risks? How effective are the Plan's monitoring provisions? Are there clear indicators and targets to measure whether the policies in the Plan are going to be effectively implemented?**

*Development management*

299. Concern is expressed that policy EM10 is not directing new housing to have significantly lower densities than in the past. Section 2(a) of the policy ensures that development should contribute to local distinctiveness; section 2(b) ensures that the living conditions of existing and future residents should be safeguarded with regard to aspects such as overlooking, access to natural light, outlook and amenity space; whilst section 2(c) ensures that due regard should be paid to the density, scale and appearance of the surrounding area, including buildings and landscape features.
300. The policy in general and provisions 2(a)-(c) in particular ensure that the Plan provides for the delivery of high quality development. There are no specific density targets in *the Framework*. Furthermore, pursuing a policy of lower densities per se would result in increasing amounts of land being required for new development for a given number of houses, which would be contrary to paragraph 58 [3] of *the Framework* which requires developments to optimise site potential.
301. I consider there are no soundness concerns with this policy, which responds to the requirement in paragraph 58 of *the Framework*, to develop robust and comprehensive policies that set out the quality of the development that will be expected for the area.

*Uncertainties and risks*

302. Uncertainties and risks are an inevitable part of the development process, especially when a range of complex demographic, economic, social and environmental factors come into play. The Council has demonstrated an awareness of the key areas of risk from the outset of the preparation of the Plan. Risk assessment has been a part of the SA and is included in the IDP, and the Plan includes an element of flexibility to respond to change, which is incorporated into its policies.
303. Although the Plan allocates sufficient land for the required levels of housing – including AH – and employment, changes in market signals and influences on whether sites will be developed for these and other uses are beyond the control of the Council. NPs are also one step removed from the Council's control. However, the Plan has been prepared taking close account of current market signals, the most likely demographic and economic scenarios and robust viability assessments. Policy SS4 sets a framework for triggering a review of the Plan if a 5 years HLS cannot be maintained over the plan period.
304. The impact of development on water quality is clearly a risk, but one that has been addressed by the Council in setting out the appropriate infrastructure requirements; policies SS4 and EM6 which address this key issue are supported by the EA. Some flexibility is also included in policy EM7 dealing

with development in close proximity to nuclear installations and in policy EM3 which guides development in relation to the Thames Basin Heaths SPA.

305. Effective monitoring will ensure quick action if the Plan is not being implemented effectively; a review would enable the Plan to respond effectively to changed circumstances, in accordance with the requirements of paragraph 153 of *the Framework*.

#### *Monitoring*

306. The Plan is to be monitored on an annual basis in accordance with the Regulations<sup>163</sup>. The details of the relevant monitoring indicators are in the Annual Monitoring Review (AMR)<sup>164</sup>. Table 1 shows how the policies are designed to deliver the objectives of the Plan. The Council also includes a table in its response to this issue, which provides a summary of how the objectives and policies will be monitored<sup>165</sup>.

#### *Issue 7 – Conclusion*

307. From the evidence before me, I am satisfied that the Plan is robust and flexible in the face of inevitable uncertainty, with the wherewithal to adapt to changed situations, and that its monitoring mechanisms are effective. I therefore consider there are no soundness concerns in relation to this issue.

### **Assessment of Legal Compliance**

308. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

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<sup>163</sup> Town and Country Planning (Local Planning (England) Regulations 2012.

<sup>164</sup> The AMR is Examination Document BD02.

<sup>165</sup> BDBC: Response to Inspector's Key Issues and Discussion Note – Issue 11: Development management, Risks and Monitoring, Appendix 1 [Examination Document PS/04/01j].

<b>LEGAL REQUIREMENTS</b>	
Local Development Scheme (LDS)	The Basingstoke and Deane Local Plan is identified within the approved LDS (September 2014) which sets out an expected adoption date of April 2015. The Local Plan's content is compliant with the LDS; the delay results from the additional work which was required following the Exploratory Meeting in December 2014, but it is now on target for adoption in May 2016.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in July 2007 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' (MM) changes.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report (April 2014) and addendums to the Screening Report (May and December 2015) which consider the proposed modifications to the Plan, conclude that there are no likely significant effects arising as a result of the Plan. The Plan contains an adequate policy framework to avoid or adequately mitigate effects on European sites. The Local Plan will not therefore require full AA under the Habitats Regulations.
National Policy	The Local Plan complies with national policy except where indicated and modifications are recommended.
2004 Act (as amended) and 2012 Regulations.	The Local Plan complies with the Act and the Regulations.

## Overall Conclusion and Recommendation

309. The Plan has a number of deficiencies in relation to soundness for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

310. The Council has requested that I recommend main modifications to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in Appendix 1, the Basingstoke and Deane Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in *the Framework*.

*Mike Fox*

Inspector

This report is accompanied by Appendix 1 containing the Main Modifications and Appendix 2 containing changes to the Inset Diagrams and Policies Map.