

2. Purpose of the Meeting and Potential Outcomes

- 2.1 The Inspector explained that the purpose of the Examination was to determine whether the Plan satisfied the legal requirements under the Act and associated Regulations, and whether it was sound. This was an Exploratory Meeting (EM) rather than a full Hearing session. At EMs, evidence was not heard and there was no discussion on the merits of the cases that parties have made. If the Examination were to go ahead, such matters would be discussed at the Hearing sessions.
- 2.2 From his initial reading of the Plan and supporting documents, the Inspector had some potentially significant concerns regarding its soundness. These had been set out in his letter to the Council dated 21 October 2014, which was on the Examination website. For the avoidance of doubt, the Inspector stressed that the concerns that he had already expressed were not the full list of questions that he had about the Plan. They were, however, particularly serious and threatened the soundness of the Plan as a whole. In the jargon, they were potential 'showstoppers'.
- 2.3 The Exploratory Meeting had been arranged to allow the Inspector to discuss these concerns with the Council and for the Council to indicate if and how these could be overcome. The Inspector stressed again that the meeting would not replace Hearing sessions. Those who had made representations on the Plan seeking changes would be able to participate in those Hearing sessions, if they had indicated a desire to do so.
- 2.4 The Inspector moved on to explain briefly the purpose of the Exploratory Meeting and the potential outcomes. As he had already said, the Exploratory Meeting was for him to discuss his initial concerns over soundness with the Council. It gave the Council the opportunity to provide clarification and to suggest how his concerns could be overcome. He intended to explain his concerns and give the Council the chance to respond to each point. Ultimately, he was looking for discussion on how the Examination should proceed.
- 2.5 Part of the aim of the EM was to avoid the wasted time, effort and expense of all parties in continuing with the Examination as planned if it is likely that the Plan would subsequently be found unsound. This did not determine that he had found the Plan to be unsound at this point, or that he had failed to appreciate the hard work that had gone into the Plan. But his concerns meant that it would be inappropriate to progress directly to arranging Hearing sessions without further discussion. He added that he would be expecting a clear indication of the Council's position but he would give a few days following the meeting for the Council's position to be confirmed formally.
- 2.6 The Inspector went on to explain that there was potential for changes to be suggested to the Plan during the course of the Examination to overcome issues of soundness, but it must be borne in mind that these should not fundamentally alter the overall strategy or result in a plan substantially different to that submitted. Also any significant changes would need to be subject to public consultation and sustainability appraisal before he could recommend them.

- 2.7 The Inspector then ran through the possible outcomes of an EM, as follows:
- Where serious concerns appear unable to be rectified, the Inspector may invite the Council to **withdraw the Plan**;
 - The concerns are resolved and the **Examination continues**;
 - There is a **temporary suspension** to enable further work to be carried out on the Plan.
 - The **concerns remain unresolved** but the Examination continues in order to examine issues in more detail, for example by holding one or more Hearing sessions. This could potentially result in the Inspector inviting the Council to withdraw the Local Plan at a later stage or the issuing of a report stating that the Plan is unsound.

3. Introductory Statement from the Council

- 3.1 Cllr Mark Ruffell welcomed everyone to the meeting and made a short introductory statement. He referred to the length of time spent on preparing the Plan since 2008, including going over the evidence, taking advice from experts, challenging and defending recommendations and widespread public consultation. He expressed confidence that this had produced a robust, evidence-based Local Plan and thanked the dedicated team of officers and Councillors from all parties for their hard work. He stressed that, whilst some members had submitted comments on the Plan, all members were committed to making the Plan successful. He concluded by noting that the Borough desperately needed a Plan in place and hoped that the outcome of the EM would assist in making this happen.
- 3.2 The Inspector thanked Cllr Ruffell for his statement and noted that, due to restrictions during the period leading up to the General Election, if the Examination continued, the hearings were unlikely to take place before May/June 2015.

4. Inspector's Initial Concerns

- 4.1 The Inspector then went through his initial concerns on soundness, as set out in his letter to the Council dated 21 October 2014 [PS/1/01], which had been posted on the Council's Examination website. He stressed that this was by no means an exhaustive list of all potential matters of soundness; and there were several other issues that would need to be addressed should the Examination progress. A comprehensive list of matters and issues would be sent out in due course.
- 4.2 The Inspector also stressed that he had not at that point reached a definite conclusion that the Plan was unsound, either on the specific points which were to be discussed that day or in terms of other matters. In general, he had found that the Local Plan was well written and user-friendly, especially for an outsider like himself; the Plan itself and the evidence base was clearly set out, so he had absolutely no concerns on the way the document looked, or how it presented itself.
- 4.3 In his letter of 21 October 2014, the Inspector had set out 13 matters of concern under 7 main issues. The Council's response to that letter

(Examination Document Ref PS/2/07), had commented on all 7 points, namely;

- **Sustainable development**, including the SA; and inclusion of a model policy on sustainability;
- **Housing need and provision**, including OAHN; SHMA; affordable housing; and G&T accommodation;
- **Environmental issues**, including environmental impact on major sites; Green Infrastructure; and water quality;
- **Transport issues**
- **Deliverability issues** and monitoring;
- **Level of detail and presentation**; including the use of SPDs; and the appropriate level of detail;
- **Superseded policies**

5. Sustainability Appraisal (concern 1.1)

5.1 The Inspector said that the Sustainability Appraisal (SA) and Strategic Environmental Assessment Report [Document SA 02] were clearly presented and illustrated the SA stages well. He asked whether the red, blue and green sustainability objectives signified economic, social and environmental sustainability (which was confirmed) and commented that the Monitoring Framework in Appendix 12, table 12, was useful.

5.2 However, the Inspector noted that in Table 4 – option 4 – the high growth option (1,000 dpa) appeared to score higher than the medium growth option (750 dpa), with only one negative impact in relation to 20 objectives. He questioned why a zero net migration option had been tested, unless it was thought to be a realistic option. Moreover, it seemed to him from reading the representations, that one of the big sustainability issues facing the Plan was whether the distribution of major development sites between the east and the west of the town of Basingstoke was sound, especially in relation to employment. He felt that more evidence was needed that this has been considered, along with some clear conclusions.

5.3 Finally on this section, the Inspector said that a Sustainability Appraisal (SA) update was needed, in order to explain more clearly why the SA opted for option 3, because Table 4 seemed to point to the higher growth option.

Council's response

5.4 Mr Dodgshon said that the Sustainability Appraisal (SA) had been independently reviewed following the receipt of the Inspector's initial concerns and that a few presentational changes would be made as a result. Overall, the SA did what it was supposed to do. However, if the Inspector's concerns could not be satisfied, the Council would look at it again. In the Council's view, the Plan genuinely prioritised brownfield over greenfield sites, as set out in Policies SS1 and SS4. He noted that only 0.4% of the total greenfield land in the Borough was allocated under the Plan.

5.5 On the zero net migration point, Mr Dodgshon said that this had been used in the demographic projections and SA to provide the ultimate baseline against which other options could be tested. It was not something that the Council was suggesting could happen.

- 5.6 With reference to the scoring of Option 4 - high growth - Mr Rehill said that the SA was a comprehensive document which looked at reasonable alternatives and provided a clear audit trail when set alongside the Local Plan. However, it was only one part of the evidence base. Paragraph 8.19 of the SA explained the reasons for choosing Option 3 – 748 dpa, namely to meet the objectively assessed housing need. He noted that Option 4 had double negative scoring whereas Option 3 did not.
- 5.7 On the matter of east/west distribution, Mr Rehill said that Appendix 13 of the SA appraised 3 options, of which Option 2 had been accepted:
1. Basingstoke focus for all development
 2. Focus on Basingstoke and spread of development to larger settlements
 3. Spread of development to greater number of settlements
- 5.8 Appendix 15 of the SA identified different options for Basingstoke and paragraph 8.83 of the SA [SA02] identified 4 options for development focussed on Basingstoke:
1. Distribution of sites around Basingstoke;
 2. Focus to the east of Basingstoke;
 3. Focus to the south west of Basingstoke;
 4. Focus to the west of Basingstoke.
- Option 1 had been the preferred spatial strategy, in order to avoid overloading one specific area. Options 2-4 had been contrary to the New Homes consultation and had faced strong local opposition.
- 5.9 Ms Brombley added that the Council had carried out sustainability testing (SA and Strategic Environmental Assessment Directive) on each site both individually and cumulatively against a whole range of criteria including transport.
- 5.10 The Inspector thanked the Council team for their responses and noted that this was a big issue matter which would be examined in more detail at the public hearings, should the Examination proceed.

6. Model Policy (concern 1.2)

- 6.1 The Inspector said that he was aware that the Government had relaxed its position on this matter since the National Planning Policy Framework had been published. However, it was important that there was a clear commitment to sustainable development in the Plan and the insertion of the model policy was a good way of ensuring this. He noted that the Council had accepted that the Plan's commitment to sustainable development was not explicitly stated, and that a policy could be inserted.

Council's response

- 6.2 Mr Dodgshon confirmed that the Council intended to include the exact wording of the model policy in the Plan, to avoid unnecessary debate at a later stage. The Inspector welcomed this approach.

7. Housing need and provision -_introductory comments

- 7.1 The Inspector thanked the Council team for their response to his concerns [PS/2/07] in which they set out their explanatory comments, and pointed him to relevant sections of the evidence base. He noted that the PPG [ID: 2a-014-20140306] warned against over-elaboration, saying that establishing future need for housing was not an exact science. It was likely that whatever figure the Plan put forward would be open to challenge.
- 7.2 However, it was clear that getting a realistic and robust objectively assessed housing need (OAHN) for the Borough was critical to determining the appropriate amount of housing to meet the Plan requirements over the period up to 2029. The Inspector noted that the starting point was the National Planning Policy Framework (NPPF) - *the Framework* – paragraph 47, which states that in order to boost significantly the supply of housing, local planning authorities should (amongst other matters) use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as consistent with the policies set out in *the Framework*. He noted that Hansard recorded the previous Government Planning Minister as stating that the country was in a housing crisis and that only half the required number of houses was being built. The Government had not published anything since to suggest that this position had changed or that Basingstoke was exempt from paragraph 47 of *the Framework*.
8. **Objectively Assessed Housing Need (OAHN) (concern 2.1)**
- 8.1 With reference to paragraph 2.1 of his letter of 21 October 2014, the Inspector noted that in assessing the likely need for housing, the Council had started with household projections, as required by the Planning Policy Guidance (PPG). The Council had appointed Edge Analytics (independent consultants), who had produced a demographic analysis of the Borough's Housing Market Area [Document HO2]. Paragraph 6.2 of this document listed most of the key assumptions. The Inspector further noted that a suite of alternative growth forecasts was set out in the Strategic Housing Market Assessment (SHMA) [HO1].
- 8.2 The Inspector agreed with the Council's general conclusion in the SHMA Chapter 6 summary that, of the 3 scenarios, scenario B (CLG 2011 – based household projections fixed) was the least realistic compared to scenarios A and C (A=2011-based headship rates (HRR), with 2011-2021 trend continued after 2021; C=2008 based HRRs, scaled to be consistent with the 2011 Census but following the original trend thereafter). However, given that the 2011-based household projections were based on an economic down turn, and it was generally accepted that the UK was facing a more buoyant economic future, at least in terms of jobs and overall GDP, the Inspector wished to know why the Plan was based on scenario A? In his view, scenario C was the more realistic and in tune with the Government's Growth Agenda.
- 8.3 Turning to Edge Analytics *Demographic Analysis and Forecasts* [HO2], the Inspector noted that Table 9 outlined 9 scenarios. Ignoring the net nil scenario, which the Council and most serious commentators recognised to be unrealistic, the figure of 748 dpa was very close to the bottom of the range

(735-983 for scenario A and 735-1,034 for scenario C). The SHMA helpfully set out the implications of different scales of housing provision [page 130, paragraph 8.4-8.13] – a Lower End (less than 650 dpa); a Mid-Range (750-850 dpa); and an Upper End (c950 dpa). The SHMA seemed to argue quite persuasively for the Mid-Range - in particular providing a basis for supporting a reasonable level of economic growth in the Borough and boosting the supply of new housing, both market and affordable housing. The 853 dpa in option C would appear to be within the range which relates to current demographic assumptions, although of course this needs to be tested at the Examination.

8.4 The Inspector also noted that the Officer Report to the Planning and Infrastructure Overview and Scrutiny Committee on 30 Jan 2014 [PS/03/26b] recommended an OAHN figure of 807 dpa, based upon what the report stated were the most robust assumptions. The Inspector outlined key points in paragraph 4.10 of the officer report, relating to headship rates, economic activity rates and international migration. He was still concerned that the 807 dpa figure could be too low, but at least it addressed his concerns. It would be helpful, he went on, if the Council were to explain why this OAHN figure had not been selected.

8.5 In conclusion, the Inspector was not persuaded that the Council's comments adequately addressed the 'somewhat skewed' position that 748 dpa had in relation to the range of OAHN in the SHMA or even in relation to the Mid-Range. He reiterated that *the Framework* is about boosting the supply of housing and promoting economic growth; there must be no suggestion that the Plan was designed to constrain unduly development if needs might be higher. This remained his primary soundness concern for the whole Plan. He then summarised his questions on this topic as follows:

1. Why had Scenario A been chosen over Scenario C?
2. Why had the bottom of the range been chosen and not the mid point?
3. Why did the Plan go against the Mid-Range outlined in the SHMA?
4. Why had the officer recommendations of 30 January 2014 not been taken on board?

Council's response

8.6 Mr Dodgshon referred to a recent conference held by the Planning Advisory Service and attended by Local Planning Authorities, with a panel made up of industry experts and Keith Holland of the Planning Inspectorate. The panel had been asked to explain, with reference to the NPPF guidance on 'significantly boosting supply', what are you boosting it from i.e. what is the baseline? No answer had been forthcoming. Mr Dodgshon went on to explain that none of the Regional Plan figures had been based on OAHN and that the South East Plan in particular had a very wide range. He drew attention to the Basingstoke & Deane Housing Trajectory set out on page 40 of the Housing Topic Paper [TPO1], which showed that whilst past delivery had been below 748 dpa, it was expected to be far in excess of this figure for 8 years, thereby 'significantly boosting supply'.

8.7 Mr Dodgshon added that whilst there was no specific job target in the Plan, having looked at the ratios of homes built and jobs created, 748 dpa would not restrict growth and could achieve a labour supply of between 568 and 1,197 jobs per annum.

- 8.8 The Inspector replied that he had always taken the 'boost' to be from the previously adopted provision, whether this be the Structure Plan or the Local Plan. Whilst he took the point that the South East Plan was not based on OAHN, his reading of the guidance had been used in appeals and never challenged. On the Council's point about the Housing Trajectory, the Inspector agreed that the figures were impressive for 8 years but said that the boost needed to be continued to the end of the Plan period. There were ways to achieve this, including phasing of contingency sites.
- 8.9 On behalf of the Council, Mr Gosling responded on the point about the 2011 census-based projections, noting that the Edge Analytics report [H02] acknowledged these weaknesses in paragraph 5.8 on page 12. Since the report was produced, 2012-based population projections had been produced by ONS but the 2012 CLG household projections were still being awaited. When published, these would look beyond 2021.
- 8.10 The Inspector noted that, in terms of using the 2011 Census, a recent TCPA paper argued persuasively that just under half of the reduction in the numbers of households was attributable to the suppressed household formation due to the state of the economy and the housing market. [Alan Holmans: *New estimates of housing demand and need in England, 2011 to 2031*; Town and Country Planning Tomorrow Series Paper 16, September 2013]. The Inspector asked the Programme Officer to add this document to the Examination Library. The paper suggested that the Council's emphasis on the 2011 figures might underestimate household formation in the future. Mr Gosling replied that he was aware of the document but that the evidence was unproven and that the extent and timing of the increase in household formulation linked to an improving economy was unknown, and unlikely in the near future.
- 8.11 Mr Dodgshon went on to refer to the flowchart on page 11 of the Council's response [PS/2/07] which showed the steps taken by the Council in determining the housing target. He noted that all of the evidence was expressed in terms of a range. Page 12 of the response summarised how the figure of 748 dpa had been chosen. If the Inspector was not happy with the assumptions that had been made, the Council was willing to discuss these further.
- 8.12 The Inspector referred back to the January 2014 Council report [PS/03/26b] which dealt with the assumptions made and proposed some changes. In particular, he noted that an 80% cap had been put on international migration in the original assumptions, which in his view was 'policy on' when the housing requirement figure should be 'policy off'. For the benefit of those present, he explained that 'policy off' referred to the figure before it was constrained by local policies ('policy on'). The Inspector was required to consider what was reasonable and the January report set this out.
- 8.13 Mr Dodgshon replied that it was important to note that assumptions did not represent policy. The 80% cap on migration came about as a result of looking at current statistics against projections. In any case, the overall impact was minimal at 13 dpa. If this assumption were removed, the small increase to the overall figure could be absorbed by contingency.

- 8.14 Ms Brombley said that the January report had been considered by members both in committee and in Cabinet and they had concluded that the 748 dpa figure was the most robust. The reasons for this decision were set out in paragraph 4.36 of the Housing Topic Paper [TP01] and included:
- Current slight economic upturn not a reliable indicator;
 - Too early to say we are in a sustained economic recovery;
 - Downward pressure on headship rates will continue due to unaffordable house prices, reluctance of lenders, increased interest rates and private debt;
 - 2011 headship rate is most up to date data;
 - 748 dpa figure is robust and fulfils Council objectives;
 - Public opinion is against a higher housing figure.
- 8.15 The Inspector noted that times were changing fast and that more recent figures showed a more buoyant economy. Adjustments would need to be made to the Council's figures. He was not convinced by members' reasons for rejecting the 807 dpa figure and he said that the answer to unaffordable house prices was to make them affordable through the Local Plan. He remained unconvinced that the 807 dpa figure was too high – on the contrary, he felt it was too low.
9. **Boosting housing supply (concern 2.2a)**
- 9.1 Paragraph 2.2 of the Inspector's letter of 21 October 2014 asked 'How does the Local Plan figure relate to *the Framework's* aims to boost housing supply and economic growth?' On **housing supply**, the Inspector noted that the Council's response set out the 5 steps it had followed in line with the NPPF as follows:
- (1) selection of a household figure from within a range – legitimate to select a figure within the range, provided it is clearly justified;
 - (2) annual update of supply, and application of 5% buffer, as there has not been a persistent under delivery [TP01, para 5.33 and graph];
 - (3) identify developable sites for the later years of the plan period, eg. Manydown and other strategic sites;
 - (4) illustrate anticipated delivery; and
 - (5) density, via policy EM10.
- 9.2 The Inspector said that he had no particular comment on the 5 steps and that he had already discussed the selection of a figure within the SHMA range, which was a soundness concern. In respect of density, he still had a question mark over Policy EM10 part 1(d) and he wondered whether this could be tightened up to focus on what a developer would be expected to deliver in the way of 'appropriate housing densities'. Larger sites might need to set their own densities. He noted the Council's assertion that only 0.4% of greenfield land in the Borough had been allocated but said that if the densities were too low, more greenfield land would be required.
- 9.3 On **economic growth**, the Inspector noted that the Local Plan did not set a specific job target, and that the Council had referred him to the Economic Master Plan [ETC08]. He accepted that this was an attractively produced, succinct document. However, he had a soundness concern that there was no

overall employment target in the Plan, for at least 3 reasons:

(a) *The Framework*, para 156 [1] pointed to homes and jobs that LPAs should deliver through strategic policies. He noted that jobs were almost as important as housing in getting the right balance and that the figure could be presented as a range;

(b) It was necessary to have a jobs growth forecast in the Plan in order to consider its appropriateness in relation to supporting evidence, not least in order to consider whether the level of housing planned for would be consistent with it and thus 'sound';

(c) In the PPG [ID: 12-002-20140306], under the heading: *What should a LP contain?* it stated that the Plan should make clear the 'what, where, when and how' questions that needed to be answered, including jobs.

- 9.4 The Inspector noted the Council's comments that there had been a wide variation in 'jobs to homes' ratios over different periods, but he felt that the Plan should give a realistic range, based on the evidence the Council already had, to give some direction, for the reasons he had already given. He felt it was especially important in order to achieve a high level of self-containment – or to continue to achieve a high level. He noted that the Borough did well on self-containment compared to other local authorities, and that the evidence required to set a jobs target was already in place.

Council's response

- 9.5 Mr Dodgshon responded that the Council acknowledged the Inspector's remarks and noted that much of the work required to set a jobs target had already been done. Cllr Ruffell confirmed that the Council would consider setting a target as suggested.
- 9.6 On the question of the need for some **contingency provision (concern 2.2b)**, the Inspector noted that just over 1,080 dwellings (para 4.43 in the Plan) could be included in the mainstream allocation when the Housing Trajectory slowed down. This equated to an extra 72 dpa which gave a new total of 820 dpa which related more closely to the updated assumptions used by Edge Analytics, and a robust housing requirement for the Borough.
- 9.7 Turning to the matter of a clear explanation for the choice of the Local Plan figure, and whether it was '**policy-on**' or '**policy-off**' (**concern 2.2c**), the Inspector noted that the Council had confirmed that the figure was '**policy-off**' i.e. not constrained by the application of local policies. He felt that this was largely right except for the point already discussed on international migration.
- 9.8 On the question of whether the **buffer (concern 2.2d)** had been factored in correctly, the Inspector noted that the Council's response referred to paragraph 5.33 of the Housing Topic Paper [TP01] which stated that there had not been a persistent record of under-delivery in the Borough. The Borough's under-delivery record in the recent past is not particularly serious, especially in relation to many other authorities. Therefore, the Inspector felt that the 5% buffer was appropriate.

Council response

- 9.9 Mr Dodgshon made reference to the Neighbourhood Planning agenda and stated that there were at least 12 Neighbourhood Plans being put forward in

the Borough, some more advanced than others. It was not within the spirit of localism to identify every site in the Local Plan but the Council was confident that the required number of homes could be delivered.

- 9.10 The Inspector said that in his experience of call-ins of Neighbourhood Plans by the Secretary of State, it was acceptable and even helpful for Local Plans to set overall figures for Neighbourhood Plans to relate to, without going down the route of identifying individual sites. The Council could consider this route but options were limited. He wished to be absolutely clear – in relation to the evidence so far submitted, the 748 dpa figure was not sound. The Neighbourhood Plan overview route was one way forward.

10. **Other Housing Issues (concerns 2.4-2.8)**

- 10.1 Following on from the discussion under 2.1 (OAHN) above, the Inspector again expressed concern that, whilst there was a loose fit between the range of housing requirements (550-1080 dpa) and Table 9 in the Edge Analytics document [H02], there was no obvious explanation (**concern 2.4**) for selecting the Local Plan housing requirement. This needed to be more transparent and he reiterated his previous soundness concern.

- 10.2 On the PPG requirement to factor in key considerations that determine OAHN (**concern 2.5**), the Inspector noted the Council's response [PS/2/07] which stated that work on cross-boundary migration, market signals and assessing the needs for the major house types, had been done and was contained within the SHMA. He noted that Appendix A on page 52 of the Housing Topic Paper [TP01] contained compliance tables showing how the evidence and the Plan met the requirements of *the Framework* and PPG and said that this was a helpful visual aid, which could be used at the Examination.

Council's response

- 10.3 On behalf of the Council, Ms Bromley explained that market signals had been factored in to the SHMA in line with the PPG, as set out in the Council's response. Since 2013, the Council had developed its own model and had concluded that house prices in the Borough were among the least expensive in Hampshire and the South East. Ms Bromley agreed to provide the Inspector with the most recent data to support this conclusion.

(The meeting was adjourned for a short break for refreshments)

- 10.4 On the Housing Trajectory (**concern 2.6**), the Inspector noted the Council's concern that inclusion of a trajectory in the Plan would quickly become outdated. Whilst the Inspector took the Council's point about future proofing the plan, in a sense all the figures in the Plan would eventually become outdated. However, Plans got reviewed and he felt that the importance of the trajectory outweighed this consideration and formed a vital part of the **what, where, when** and **how** in para 002 of the PPG local plans section. He welcomed the Council's offer to include it within section 4 of the Plan in support of Policy SS4.
- 10.5 On affordable housing (**concern 2.7**), the Inspector noted the Council's assertion that out of the 800 households pa in need of affordable housing, 494

homes were made available pa through re-lets. However, the **re-lets** figure seemed high to the Inspector, and he requested the Council to provide evidence to substantiate it. Regarding viability, the 3 Dragons' consultants [H 10] considered this and their work had informed policy CN1. The Inspector was happy for this and the 40% affordable housing target to be scrutinised during the Examination, although he noted that the target had been criticised by developers and would not necessarily be found sound.

Council's response

10.6 Mr Dodgshon replied that realism of the 40% affordable housing target had been borne out by recent planning permissions including those at Kennel Farm, Razor's Farm and North of Popley Fields.

10.7 On gypsy and traveller accommodation (**concern 2.8**), the Inspector noted that the guidance on *Planning Policy for traveller sites* published in March 2012 remained Government policy. It made it clear in paragraph 9 that LPAs should identify specific sites for gypsies and travellers for the first 5 years and broad locations for later years. Policy CN5 as it stood in the Plan did not do this. As the Council stated in its response, it was a development management policy and there was no intention to allocate specific sites in the Plan. However, whilst Policy CN5 set the criteria, at the very least there needed to be a target, presumably based on the Gypsies and Travellers Accommodation Assessment. For the Inspector, this remained a soundness concern. He outlined three possible options: (i) a policy which included full site locations for G&T pitches; (ii) putting a target in the Plan; or (iii) setting out a timetable for preparing a plan which would do so in the near future.

Council's response

10.8 Mr Dodgshon replied that whilst this was not something that the Council could commit to at present, it would be covered in future written responses to the Examination.

11. Environment Issues (concerns 3.1-3.1)

11.1 Regarding environmental impact on strategic sites (**concern 3.1**), the Inspector noted that SS3.7 (Redlands) and SS3.9 (East of Basingstoke) were located close to the Integra North Energy Recovery Facility (ERF) and the Thames Water Chineham Sewage Treatment Works (STW). The Council had stated that these policies contained specific criteria to ensure acceptable noise and odour standards and that ERFs were also subject to waste and pollution control through other legislation. The Environment Agency appeared to be on board with the Plan and Hampshire County Council had indicated that policy SS3.9 (East of Basingstoke) could take another 450 dwellings (30 dpa), thereby helping to boost the overall figure. The Inspector noted the Council's assertion that these sites were viable and deliverable within 5 years, as evidenced in the SHLAA [H04].

Council's response

11.2 Mr Rehill confirmed that the Council had received no objections from the Environment Agency to the two sites and that, moreover, the Council had Natural England's support for the criteria in the policies. The Inspector confirmed that he was happy for these matters to be scrutinised during the

Examination.

- 11.3 On the matter of the Loddon River Valley (**concern 3.2**), the Inspector noted that a small part of the Biodiversity Project Area (BPA) and Biodiversity Opportunity Area (BOA) fell within housing proposal SS3.9 (East of Basingstoke) and was close to SS3.7 (Redlands). He noted that new development could assist with the delivery of Green Infrastructure, especially larger developments, and that both policies contained relevant criteria to this effect, supported by Natural England. However, the Inspector questioned how buffering could stop cat predation.

Council's response

- 11.4 Mr Dodgshon replied that less than 1% of the sites in question were located within the BPA and BOA. The Inspector said that he was content for these matters to be scrutinised during the Examination but that he would be raising the question of why any part of the sites had to be within the Biodiversity Areas.

- 11.5 On water quality (**concern 3.3**), the Inspector noted that the Council in its response had referred to the Infrastructure Delivery Plan [CD20] which described the process which the water and sewerage treatment companies went through in respect of funding for new and upgraded infrastructure, and highlighted the 5 year cycle of funding bids to the regulator, OFWAT. The level of development in the Plan was within the order previously anticipated by Thames Water, and there were currently no known 'show stoppers' to development. Southern Water also had not identified any additional constraints to prevent the proposed development coming forward. Therefore the Inspector was happy for this to be scrutinised during the Examination.

12. Transport Issues (concern 4.1)

- 12.1 With reference to residual cumulative impacts on key routes, such as the A33, the Inspector noted that a number of residents had raised concerns about this issue. The Council had drawn attention to its close working with Hampshire County Council (the highway authority) and consultants Parsons Brinckerhoff, who had good sustainability credentials, to understand the local highway network, the impact of development and the infrastructure improvements that needed to be put in place to accommodate additional demands. The Inspector noted the Council's position and said that he was happy for these issues to be scrutinised during the Examination.

13. Deliverability issues (concern 5.1)

- 13.1 On the matter of evidence that aspirational policies, such as SS10 for a new railway station at Chineham, were deliverable within the plan period, the Inspector noted the Council's view that the Local Plan was aspirational but realistic and that Policy SS10 was an enabling policy, giving a positive plan-led approach. The Council was concerned that removal of the policy would result in a policy vacuum. However, the Inspector was still concerned to ensure that the Plan avoided the creation of planning blight. He therefore asked the Council for an update on the viability of the project, and the likely Local Enterprise Partnership (LEP) position over the full plan period to 2029.

Council's response

- 13.2 Mr Dodgshon replied that the station at Chineham was referred to in the Transport Plan and the Community Infrastructure Levy (CIL) Schedule and that the land itself had been identified within a S106 agreement. The Inspector acknowledged this but noted that the S 106 Agreement ran out in 2021. Mr Lambert referred to a further funding bid submitted to the LEP, which was generally supportive of the scheme. He also confirmed that the scheme was linked to the programme for the electrification of the Reading to Basingstoke line. Network Rail had not yet confirmed that the policy was acceptable but the Council had carried out feasibility studies with the County Council.

14. Level of detail and presentation (concerns 6.1-6.3)

- 14.1 The Inspector made reference to Appendix 5 in the Local Plan, which set out guidelines for master planning. Whilst acknowledging that this was a commendable piece of work, he drew the Council's attention to the 2012 Local Planning Regulations (**concern 6.1**), which stated that the allocation of sites and policies for their development could not be devolved from a Local Plan to Supplementary Planning Documents (SPDs). He noted that this applied to master plans as well as to DPDs. It was clear that development management policies, site allocations and infrastructure contributions could not be 'hidden' in SPDs.
- 14.2 The Inspector went on to state that the remit of an SPD was limited by Regulation 5 (1) (a) (iii) to any environmental, social, design or economic objectives which are relevant for the attainment and use of land which are mentioned in Regulation 5 (1) (a) (i), i.e. attributable to a Local Plan. Therefore, strategic development policies in the Local Plan could not refer to SPDs to allocate land or set developer contributions; these aspects needed to be covered in a Site Allocations Local Plan. *The Framework*, para 157 [4&5] stated that Local Plans should indicate broad locations on a key diagram, whilst promoting details on form, scale, access, and quantum of development where appropriate.
- 14.3 The Inspector noted that the Council was willing to consider producing an Inset Diagram if required to do so. The Council had given Policy SS3.10 (Manydown) as an example in illustrating how the Local Plan covered the 'what', 'where' and 'when' questions. The Inspector's view on the appropriateness of detail to comply with the Regulations and *the Framework* was to include the indicative locations of the major uses, for example a district centre or a school, as well as access points and Green Infrastructure. Elsewhere, the Inspector had been involved with creative sessions with participants, developers and the Council to decide what went where. If the Council was willing to adopt this approach, the Inspector's soundness concerns could potentially be overcome, and he was happy for this to be scrutinised during the Examination.

Council's response

- 14.4 Mr Dodgshon said that the Council welcomed the Inspector's suggestion to consider the detail of the Inset Diagrams, although he was mindful that they

should not include the wrong details. The Inspector acknowledged that there was a wide spectrum of views from developers on what should be included in an Inset Diagram.

- 14.5 On the matter of regeneration proposals and appropriate level of detail (**concern 6.2**), the Inspector welcomed the Council's positive approach in relation to **Basing View** and found the Council's offer to include an inset diagram helpful. He noted that matters such as scale, type of uses/commercial activity, phasing and an indication of outcomes in terms of number and type of jobs would address the 'what', 'where' and 'when' questions and could also help with marketing the site.

Council's response

- 14.6 Mr Dodgshon reiterated that the Council would welcome the exercise of drawing up an inset diagram.
- 14.7 The Inspector indicated that the Council's inclusion of a Key Diagram (**concern 6.3**) in document CD/04 Policy Maps was helpful and also that the locations of the strategic sites were a useful addition to the policy maps.

15. Superseded Policies (concern 7)

- 15.1 The Inspector noted that Document CD03 (Appendix 6) listed all relevant Adopted Local Plan policies and that the Council had expressed its willingness to include the list in the Plan.

16. Summing up the morning session

- 16.1 The Inspector thanked the Council team for their responses and noted that he would outline the list of items requiring further work or a different approach at the end of the day.
- 16.2 The Inspector also thanked the other participants for sending in their statements and keeping to a single page in line with his request. He said that he was very interested in what they had to say in the afternoon sessions but asked them to confine their comments to his concerns.

(The meeting was adjourned for lunch between 12.15pm and 1.15pm)

17. Participants' Comments – Session 1 (Topics 1 & 2)

Please note that these notes are intended to provide a summary of the points raised by participants. Most participants submitted the points they wished to raise at the meeting in detail and in writing and these are all available in the Examination Library.

Topic 1 – Sustainable Development (concerns 1.1 & 1.2)

- 17.1 Mr Douglas Bond (Woolf Bond Planning) representing **Flavia Estates and JPP Land** said that his clients welcomed a LP policy on sustainable development.
- 17.2 Dr Pauline Holmes of the **Hampshire & IOW Wildlife Trust** made the following points [PS/03/13]:

- The plan is unsound and the SA is not robust enough as they fail to protect the Loddon Valley and the water environment from the adverse effects of development;
- We question the scoring in the biodiversity assessments undertaken for the East of Basingstoke;
- The SA statement that 'impacts on biodiversity could be satisfactorily mitigated' (ED SA04) is incorrect and we question why the impacts are not avoided in the first place, why no further assessments were provided when the biodiversity assessment stated they were needed, and why this site has been chosen above other sites with less biodiversity impact.

- 17.3 Dr Tom Ridler of **Overton Parish Council** [PS/03/19] noted that the absence of a Local Plan left the village at the mercy of speculative development. A Neighbourhood Plan to meet the Borough's housing numbers was well advanced, even though the Parish Council did not believe they were needed, in order to minimise the impact and ensure proper integration. He proposed that there should be a moratorium on speculative planning applications whilst the Examination was in progress.
- 17.4 Mr Gary Rolfe of **Save Oakley Village Action Group (SOVAG)** [PS/03/23] noted that the PPG required the SA to be at the 'heart of the plan'. In this Plan, the SA seemed to be bolted on – the Plan favoured greenfield sites instead of directing development towards brownfield sites; did the brownfield sites run out for the last 6 years of the plan? In other places, the supply of brownfield sites continued for decades yet in this plan, it dropped to 61 dpa in the final years, leading to a shortfall of 4,000 homes.
- 17.5 Mr Stafford Napier of **Basingstoke South West Action Group (SWAG)** [PS/03/25] said that SWAG shared the Inspector's concern that the SA may not be sufficiently robust. There had been no overarching SA of the relative sustainability of the locations selected for development which included both brownfield and greenfield sites, especially in terms of relative access to sustainable transport, employment, local services and the town centre.
- 17.6 **Mr Paul Beevers** representing **Natural Basingstoke** [PS/03/02] asked whether the Inspector's examination of the robustness of the SA in respect of the Manydown site would include the soundness of the Biodiversity Assessment, given that it covered only part of the site and did not assess the site as potential green open space in an area deficient in Country Parks. The Inspector said that he would consider all the issues put before him should the Examination proceed, and that he would publish a series of detailed questions – some relating to the issues raised by Natural Basingstoke - to which the Council would be expected to respond.
- 17.7 **Cllr Onnalee Cubitt** [PS/03/06] referred to a failure on the part of the SA to consider the flood risk ranking in the site selection process. She hoped that the Inspector would ask the Council to set out how it had adhered to paragraphs 100 and 101 of the NPPF in relation to the Sequential Test. She added that the Environment Agency had raised strong objections to the East of Basingstoke site early on in the process and questioned why it seemed to have changed its view.

17.8 **Mr Martin Heath** [PS/03/12] said that he represented **Basingstoke Transition Network**, a group of residents seeking a cleaner, greener way of life. Basingstoke produced high levels of greenhouse gases and waste and the River Loddon was one of the most polluted rivers in the country. The Council wanted all new homes and buildings to be built to sustainable development principles and had produced a Climate Change Strategy, yet this was not reflected in the Plan, which also ignored the 2013 Guidance on Renewable Energy. At the very least, the Network wished to see buildings constructed to Level 6 and BREAM excellence or better.

Council's response

17.9 On behalf of the Council, Mr Rehill reiterated that a comprehensive Sustainability Appraisal had been carried out at each stage of evolution of the Plan and that it had been independently reviewed and found fit for purpose.

18. Topic 2 – Housing Need (concerns 2.1 and 2.2)

18.1 Mr Aaron Twamley (Boyer Planning) on behalf of **Basingstoke Golf Club** [PS/03/01] said that his client supported the Inspector's concerns about the housing numbers and encouraged the Council to revise the figures upwards.

18.2 Mr Alan Read of **Countrywatch** [PS/03/09] made reference to a letter dated 6th November 2014 from Brandon Lewis MP, Minister for Housing and Planning, and to a press release from Maria Miller MP dated 16th November 2014 and asked the Inspector to take these into account. He went on to make reference to the contingency figure of 1,093 set out on page 5 of the Council's response [PS/2/07] and asked that specific details of these sites be published in the Plan so that the public could be consulted on them.

18.3 Mr Douglas Bond (Woolf Bond Planning) representing **Flavia Estates and JPP Land** [PS/03/11a] said that he had significant concerns about the insufficient level of housing provision in the plan and he hoped it would be amended before Examination. The current Plan proposed a reduction in supply, not a 'significant boost' as required by the NPPF and it had not been planned positively. The Council's continued emphasis on recession had been rejected at other examinations.

18.4 Mr James Stevens of the **Home Builders Federation** [PS/03/14] said that clarity was required about the origin of the Council's figures. The Council's OAHN was an unadorned demographic projection which should be the starting point, not the end point. Application of the RTPPI toolkit *Understanding the latest DCLG household projections* indicated that some 990 households may form on average between 2011 to 2021. He questioned why the Council's figure was so much lower and feared that this would only compound existing problems with affordability.

18.5 Ms Jade Ellis (Turley) representing **Middleton and Portway Estates** [PS/03/17] reiterated and confirmed the concerns expressed about the 748 dpa figure, which was significantly lower than the SE Plan figure of 945 dpa. The Council figure relied on demographic modelling which did not take into account the need to meet economic growth or affordable housing needs. In

the absence of a jobs target, an employment-led scenario as set out in the Housing Topic Paper [TP01] would provide a more appropriate level of growth, equating to a housing requirement of between 940 and 1,007 dpa.

- 18.6 Dr Tom Ridler of **Overton Parish Council** [PS/03/19] noted that the SE Plan assumed that development would be to the east of Basingstoke and that there would be minimal housing needs to the west, where Overton was situated.
- 18.7 Mr Stafford Napier of **Basingstoke South West Action Group (SWAG)** [PS/03/25] said that they would bring evidence before the Examination of housing over-delivery by Basingstoke against its targets for the period 2006-13, thereby skewing the demographic evidence in the Edge Analytics report. He noted that the March 2014 PPG required the Council to take account of past over-delivery. On affordability, he noted that Basingstoke had the least expensive housing in the south east and M3 LEP area, so transport and environmental issues should carry more weight. If 748 dpa addressed the housing need, any more would make these issues worse.
- 18.8 Ms Joanne Russell (Barton Willmore) representing **SEGRO** [PS/03/20] referred to her client's interest in Kingsland Business Park and to a limited supply and pent-up demand for employment land. She welcomed the changes to the Plan since 2013 but felt that Policy EP1 and the supporting text did not provide enough detail and did not reflect the Employment Land Review.
- 18.9 Mr Roger Tustain (Nexus Planning) representing **Taylor Wimpey** [PS/03/27] said that he agreed with the Home Builders Federation but there was a policy mismatch between employment and housing provision. He noted the rejection by members of the officer report of January 2014 and that the Housing Topic Paper [TP01] concluded that a target of 600 jobs per annum would support 890-990 dpa. He concluded that a housing requirement of 940 dpa should be the absolute minimum for the plan period.
- 19.10 Ms Judith Ashton (Judith Ashton Associates) representing **Wates Developments Ltd** [PS/03/26] said that, taking into account the most recent work by Edge Analytics as reported to committee in January 2014 and given the improved economic situation, the Plan should be looking to deliver c 900 dpa as a minimum.
- 19.11 **Cllr Rob Golding** [PS/03/07a] said that, in support of the 748 dpa figure, the NPPF requirement to meet OAHN could not displace the obligations imposed by the EU Water Framework Directive. Any increase in the figure would increase water pollution and lead to an unacceptable deterioration in band status.
- 19.12 **Mr Martin Heath** [PS/03/12] on behalf of **Basingstoke Transition Network** drew attention to the dilemma faced by the Council in attempting to balance the needs of 50,000 young people, 6,000 of whom were on the housing waiting list, against the constraints of limited infrastructure. The solution was Manydown Transition Town, which allowed for half of the land to be sold off and the remainder to be developed in a sustainable manner.
- 19.13 **Ms Maria Miller MP** [PS/03/16] referred to the March 2014 planning guidance which required development to be sustainable on three fronts of equal

importance – economic, social and environmental. A 'policy off' figure did not take account of this requirement. In Basingstoke, the limiting factors were water pollution and chronic road congestion. Noting that the Council had confirmed that 748 dpa was the 'policy off' figure, Ms Miller asked what would be the 'policy on' figure that took account of these factors and what had the Council done to take these into account?

Council's response

- 19.14 Mr Dodgshon said that the assessment of need was 'policy off'. This figure was then assessed against the local constraints. The 748 dpa figure represented what was considered deliverable with mitigation and consequently it was also 'policy on'. He noted that water companies such as Thames Water were already applying mitigation to the pollution problems. There was no evidence of a 'tipping point' on pollution matters. The Inspector asked him to confirm whether there was evidence to show that a housing figure above 748 dpa was unacceptable in relation to water pollution, and Mr Dodgshon agreed that the Council would investigate this.

20. Topic 3 – Other Housing Issues

- 20.1 Mr Aaron Twamley (Boyer Planning) on behalf of **Basingstoke Golf Club** [PS/03/01] said that Policy CN1 on affordable housing was unsound and should be amended to 30% for Basingstoke and 40% elsewhere in the Borough. His reasons related to the evidence base and the 3 Dragons work.
- 20.2 Cllr Malcolm Bell of **Bramley Parish Council** [PS/03/03] referred to recent planning applications in the village, allocations for Bramley in the Plan and a lack of infrastructure to support more new development. He asked that the village be given respite from further development as it was unsustainable without considerable improvements in social, transport, leisure and safety infrastructure.
- 20.3 Mr Douglas Bond (Woolf Bond Planning) representing **Flavia Estates and JPP Land** [PS/03/11a] made reference to paragraph 2.3 of the Inspector's concerns and said that the SHMA was flawed as it made no reference to the housing needs of other local authority areas such as Surrey Heath and Rushmoor.

SHMA, HMA and 'self-contained' (concern 2.3)

- 20.4 The Inspector apologised for omitting from the morning's discussion paragraph 2.3 of his letter of 21 October 2014, which asked 'how **self-contained** is the Borough, and is it appropriate for Basingstoke to be planned in isolation?' He noted the Council's response set out in document PS/02/07 which referred to movement between Basingstoke, all neighbouring authorities and London and asked whether the Council stood by its separate Housing Market Area and whether it had been approached by the Mayor of London, as has happened with other authorities, such as Bedford.

Council's response to concern 2.3

- 20.5 Mr Dodgshon confirmed that the Council stood by its HMA and noted that the guidance did not require 100% zero movement in order for an HMA to be self-

contained. Other local authorities had assessed their own areas and these did not include Basingstoke. The Borough had not been approached by the Mayor of London but, if this happened, the Council would comply with the Duty to Co-operate and would seek to address the issue with its neighbours. On this basis, the Inspector confirmed that he was happy for this to be scrutinised during the Examination.

- 20.6 Returning to Topic 3, Ms Jade Ellis (Turley) representing **Middleton and Portway Estates** [PS/03/17c] called for greater transparency in how the figure of 748 dpa was reached. In particular, she drew attention to the Council report of January 2014 which she had included with her submission for the meeting and which recommended a figure of 807 dpa, rejected by members.
- 20.7 Dr Tom Ridler of **Overton Parish Council** [PS/03/19] said that the Transport Assessment Report May 2014 had not considered the cumulative impact on settlements outside Basingstoke of nearby developments such as those around Andover. Moreover, he noted that the marketing of two recent developments in Overton had clearly been aimed at London commuters.
- 20.8 Mr Stafford Napier of **Basingstoke South West Action Group (SWAG)** [PS/03/25] said that there would be more 'leakage' and self-containment would reduce as development moved further from the town centres and into greenfield sites.
- 20.9 Ms Judith Ashton (Judith Ashton Associates) representing **Wates Developments Ltd** [PS/03/26] said that the Plan should address the needs of London and the wider commuter area. Affordable housing provision was assumed to be 40% on all sites but the re-lets figure was very high and no account had been taken of the changes to 10 units or less.
- 20.10 Cllr David George, representing **Whitchurch Town Council**, said that they were 18 months down the Neighbourhood Plan route and near to submission after extensive public consultation. He warned that any changes to the housing figure in the Local Plan could have a major impact on Neighbourhood Planning and derail the process, unless it was done in close consultation with local communities.
- 20.11 **Ms Maria Miller MP** [PS/03/16] referred to Government guidance which allowed previous oversupply to be taken into account and noted that the last regional target had been 30% higher than the Borough's requirement. She asked the Council to clarify whether the Borough had been meeting the housing needs of other local authorities for the past 10 years. With reference to the Council's response to her previous comments (paragraph 19.14 above), she noted that the Council had no evidence of the 'tipping point' where the housing figure became unsustainable due to pollution and congestion and asked which parts of the evidence base would become invalid if the figure changed.

Council's response

- 20.12 With reference to affordable housing, Mr Dodgshon said that the 40% figure had been consistently achieved. There had been a recent change in the threshold for provision of affordable housing but initial work had shown that

based on 50 dpa for small site windfalls, this would result in a reduction of 20 dpa or 360 over the plan period which was small enough to be covered by flexibility. He was happy to discuss a way forward on this issue. Mr Lambert added that the impact of development in neighbouring areas had been factored in to existing and future commitments in the Plan.

(The meeting was adjourned for a short break for refreshments)

21. **Topic 4 – Environmental Issues**

- 21.1 Cllr David Thornton for **Chineham Parish Council** [PS/03/05] said that many of his points had been covered by Cllr Cubitt and the Wildlife Trust but he wished to stress that the Water Framework Directive was not causing the stir that it should. The Inspector noted that this issue was linked to his request to the Council to provide evidence on the 'tipping point' for the housing figure.
- 21.2 Mr Alan Read of **Countrywatch** [PS/03/09] said that they shared the Inspector's concerns set out in paragraph 3.1 and were not satisfied with the Council's explanation, given that the River Loddon was already failing water quality standards. The Inspector emphasised that he was keeping an open mind on the subject and that he was content for these issues to be looked at in greater detail in the Examination.
- 21.3 Dr Tom Ridler of **Overton Parish Council** [PS/03/19] said that Overton was on the River Test and was experiencing similar issues with sewage and reduced water pressure. He noted that Southern Water was finalising its 5 Year Capital Expenditure Plan and that there would be a five year gap before any further expenditure.
- 21.4 Cllr David George representing **Whitchurch Town Council** was concerned that the River Test would go down the same route of decline as the Loddon. A planned upgrade in 2012 by Southern Water had been delayed, setting up a long term problem for the future.
- 21.5 **Mr Paul Beevers** representing **Natural Basingstoke** [PS/03/02] referred to the need to build sustainable habitats for wildlife on the Manydown site and reiterated that the biodiversity evidence base was unsound.
- 21.6 **Cllr Onnalee Cubitt** [PS/03/06] was concerned with the proximity of two of the sites (SS3.7 and SS3.9) to the sewage treatment works and the incinerator. She maintained that the water companies were legally obligated to state that they could cope with additional capacity. In her view, both the Water Cycle Studies were flawed and the Council would be unable to provide the 'tipping point' evidence requested by the Inspector because there was no way of measuring the data.
- 21.7 **Ms Maria Miller MP** [PS/03/16] questioned how the Council could produce evidence showing no harm, given that the Water Cycle Study did not cover the last 6 years of the Plan. The Water Framework Directive required pollution levels to be reduced – what plans were in place for improvement? And what would be the 'policy on' figure if the Water Framework Directive were properly viewed as a constraint?

Council response

- 21.8 On behalf of the Council, Mr Dodgshon read out the Council's response to representations received during the consultation on the Local Plan, which stated: *"Although the Water Framework Directive specified that water quality must attain 'good' status by 2015, there are circumstances where it is possible to delay meeting good status until 2027, or where a lesser objective is required. These circumstances included technical feasibility, disproportionate costs, or natural conditions (recovery times). It is likely that these circumstances will lead to an extended deadline to meet good status. The policy as drafted states that "should monitoring indicate that there is likely to be in an element's band status". This means that should monitoring flag up the potential for deterioration, Policy SS4 will kick in. No deterioration requires that a water body does not deteriorate from its current ecological or chemical classification, and applies to individual pollutants within a water body. The Water Framework Directive allows for deterioration within the limits of a status or classification. For example, if dissolved oxygen was currently classified as moderate status, and the limited numerical deterioration acceptable within each classification or status would not constitute a breach of the Directive or be reported as deterioration. The EA have flagged up to Thames Water STW that require improvements works etc. and this information is submitted to OFWAT to secure funding to enable TW to make these improvements. The EA have no overall concerns with the housing number and the Council continues to work with the EA on additional modelling to update the Water Cycle Study."*
- 21.9 He added that the Environment Agency had just confirmed that water gauges to measure flow rates linked to water quality would be installed and in operation on the River Lodden by March 2015. Finally, he noted that Southern Water had raised no objections to the Plan and that Natural England supported Policies SS3.10 and EM4.
22. **Topic 5 - Transport Issues**
- 22.1 Cllr David Thornton for **Chineham Parish Council** [PS/03/05] made reference to congestion on the A33 which would be compounded by the current proposals. The Plan had no specific proposals to address these problems and phrases such as 'mitigate' and 'improvement' were meaningless without firm, costed and funded proposals in place.
- 22.2 Ms Heather Rainbow on behalf of **CTC Right to Ride** [PS/03/10] said that the Plan was not sustainable without a Cycle SPD and a Cycling Strategy to provide the detail and impetus required to design cycle-friendly infrastructure and achieve a modal shift to cycling.
- 22.4 Mrs Sheila Campbell representing **Stratfield Turgis Parish Meeting** [PS/03/24] said that the impact on traffic of the proposed developments under Policies SS3.7 (Redlands) and SS3.9 (East of Basingstoke) put the future of villages such as Stratfield Turgis at risk. A bypass such as that proposed in 1990 was not the answer – the solution was to avoid development to the east of Basingstoke which would overload the A33.
- 22.5 Mr Stafford Napier of **Basingstoke South West Action Group (SWAG)**

[PS/03/25] noted the Inspector's concerns about impact on the A33 and drew attention to the impact on the A30 south west corridor, which faced a far greater proportion of new housing development. SWAG wanted the Council to revise its Transport Assessment for the reasons set out in its statement and asked that the Highways Agency (HA) be invited to attend the public hearings to answer questions. The Inspector noted that the HA did sometimes appear at examinations, but not often.

- 22.6 **Mr Geoff Burnes** said that he was aware that the A33 was scheduled to benefit from new infrastructure improvements but that the A30 attracted no such investment and there was no certainty that the infrastructure could be delivered. He asked whether the Inspector would be considering this.
- 22.7 **Cllr Rob Golding** [PS/03/07b] said that the current plans did not contain the transport improvements necessary to prevent the proposed development (particularly at Manydown) from having a severe impact. There was no evidence of funding and deliverability and this was contrary to the NPPF and also to Policy CN6 of the Plan, which sought contributions from the Community Infrastructure Levy (CIL). The Inspector noted that CIL would only provide 10-15% of the funding gap.
- 22.8 **Mrs Chris Rose** [PS/03/30] joined the meeting with reference to environment issues and asked a number of questions relating to green infrastructure in the Loddon Valley, the separation of Old Down Park from the strategic gap shown in map 7a (Policy SS3.10), responsibility for water infrastructure at Manydown and the proposed sustainable drainage system.
- 22.9 **Ms Maria Miller MP** [PS/03/16] said that Basingstoke had one of the highest levels of house building in the country but no infrastructure improvements to match. The May 2014 Transport Assessment had identified a need to upgrade 13 roundabouts at a cost of £26 million. She asked the Council what plans had been developed to resolve the problems and how would the new infrastructure be funded and phased to ensure it was built before occupation of new development? In addition, what analysis had been made of the cost of overcrowding on mainline trains? The Inspector said that he shared Ms Miller's concerns on this last point but that it was beyond the scope of the Local Plan.
- 22.10 **Cllr Stephen Reid** [PS/03/29] argued that the west of Basingstoke including Manydown should be planned strategically, including provision of a link road and railway crossing. This provision should be made in the Plan itself and not left to a master plan.

Council's response

- 22.11 In response to CTC Right to Ride, Mr Lambert said that the Council was in the early stages of drafting a Cycle Strategy and would work with local groups to achieve this. With reference to funding for transport improvements, bids had been submitted to the LEP and progress was being made on closing the funding gap.
23. **Topic 6 – Level of Detail**
- 23.1 Cllr David Thornton for **Chineham Parish Council** [PS/03/05] said that the

level of detail in the Plan was insufficient to allow the public to make judgements about infrastructure provision.

- 23.2 Mr Douglas Bond (Woolf Bond Planning) representing **Flavia Estates and JPP Land** [PS/03/11b] made reference to the Worting Conservation Area, which represented a discrete area within the Manydown site, and comments made by the previous Local Plan Inspector. He welcomed the proposal to hold sessions to discuss inset diagrams for the site either as a whole or in parts. The Inspector noted that he was examining a new Local Plan under updated legislation, and the comments of previous Inspectors may no longer apply.
- 23.3 Mr Gary Rolfe of **Save Oakley Village Action Group (SOVAG)** [PS/03/23] referred to a big problem with unused sites and vacant office space and said that the proposals in the Plan were not detailed enough to address the issues. As an example, Basing View was 50% vacant but with employment growth predicted to be modest, there was more potential space than could be taken up.
- 23.4 Mr Stafford Napier of **Basingstoke South West Action Group (SWAG)** [PS/03/25] asked whether the Inspector was concerned that there was no master planning for transport and sewerage at Basingstoke Golf Course, where club members had voted for it to be made available as a housing site, or at Kennel Farm, which had planning permission for residential development. The Inspector replied saying that there was an argument that something with planning permission should not be in the Plan at all. However, many developers were in favour of inclusion as it safeguarded their position and many Councils argued that inclusion strengthened theirs.
- 23.5 **Mr Paul Beevers** representing **Natural Basingstoke** [PS/03/02] asked whether Green Infrastructure Strategies should be included in master plans so that they could be scrutinised. The Inspector noted that he had experience of holding informal sessions on inset diagrams, where green infrastructure strategies had been a key element.

24. **Summary of Inspector's Concerns**

- 24.1 The Inspector thanked all the participants for their input and went on to summarise his 13 concerns or requests for further information as follows. He noted that some items had arisen from the points raised by other participants in the afternoon session:
1. On the SA, he wanted a clearer indication on why Option 3 had been chosen over Option 4 and the sustainability implications of each and the soundness implications of the east/west distribution of housing;
 2. The model policy on sustainable development should be included in the Plan;
 3. On housing (the most important issue in his list), he wanted a revised OAHN for the Borough which related well to the range and was evidence-based in relation to the economy, migration, household formation etc. He was happy for the Council to respond on this at a later date;
 4. The Housing Trajectory should be included in the Plan;
 5. There should be an employment range or figure in the Plan;

6. On gypsy and traveller accommodation, he saw three options to ensure that Government policy was addressed: (1) allocate sites in the Plan, (2) provide overall figures for development control purposes; (3) provide a date for a new allocations plan;
7. On the requirement for extra detail on strategic sites, the Inspector was happy at this stage for the Council to confirm they were willing to go down the route of inset diagrams and roundtable workshops;
8. The Inspector required information on re-lets of affordable housing for the past 5 years but he was prepared to let the matter go to Examination, recognising that some participants had reservations;
9. Chineham Station – he required an update on the viability of Policy SS3.10, including information from the LEP to demonstrate that this was realistically achievable within the plan period;
10. Additional SA/HRA work may be required if the housing figure is increased, depending on whether the contingency sites had been factored in already. Advice should be sought from the Council's consultants;
11. Up to date data was needed on relevant housing market signals, as outlined by Ms Bromley;
12. More detail was required on infrastructure to the south west of Basingstoke, including the A30, sewerage and a range of other things to ascertain whether the Plan was realistic and deliverable;
13. Information on the 'tipping point' for development in excess of 748 dpa (i.e. up to 850 dpa) in relation to transport and environmental implications for the Rivers Lodden and Test. Are there any major 'show stoppers'?

24.2 The Inspector emphasised that an imperfect plan was better than no plan at all and he wished to assist the Council in getting the plan through the Examination rather than finding it unsound. He asked the Council for an initial response, recognising that it would provide a more considered view later on, following consultation with members.

Council's response

24.3 Mr Dodgshon welcomed the Inspector's comments and noted that there were a few 'quick wins' among his list of concerns, notably the information on market signals and re-lets which could be provided very quickly. The Council would consider the other issues and provide a view on the timescale necessary to address them.

24.4 Cllr Ruffell said that from a member perspective, the housing number and the issues of sites and constraints were very important and closely linked. Members would want to consider these matters very carefully and it was unlikely that the Council could respond on these matters until the end of January. In addition, he noted that any change to the housing number and sites allocations would need to be considered carefully to ensure there were no unintended consequences e.g. on transport issues. He also recognised the need for public consultation and noted that the General Election was likely to have an impact on the timetable for this. If the Council consulted after the election, the Examination would be pushed back to June/July at the earliest.

24.5 Cllr Cubitt commented that if 850 dpa was the 'policy off' figure, then the

application of local constraints might result in a 'policy on' figure of 748 dpa. She asked whether it would be more prudent to push on with the Examination rather than face further delay.

- 24.6 The Inspector reminded the Council of the four options open to them, as stated at the beginning of the meeting. There was a very high risk of the 748 dpa figure being found unsound. The Council needed to indicate how it wished to proceed with reference to those four options, and put forward a timescale for doing so. He recognised that these were not easy decisions but said that it was a critical part of his role to ensure that housing supply was boosted in the current housing crisis.
- 24.7 The Inspector went on to note that there were 12 working days to Christmas and he promised to publish a note of the meeting within a few days and to outline what needed to happen. The Council then needed to consider its preferred way forward. If new sites were extensions to existing broad allocations or were already included within contingencies, or were general figures in Neighbourhood Plans, the Council may find it had achieved the increased figure without looking for more sites. Any SA technical work could be done during the election period. The Inspector calculated that, due to the number of representors who wished to speak, the Examination would take six weeks, with at least a week off in between. He undertook to prepare his final report as soon as possible after the Examination.
- Final questions from participants**
- 24.8 **Ms Maria Miller MP** said that a number of the issues she had raised had not been dealt with e.g. water quality and she asked how participants would know that their comments had been taken into account? The Inspector replied that there would be a note of the meeting and he would also prepare a list of discussion points prior to the hearings, taking on board the points made by participants. If anyone felt that their points had been ignored, he was happy to review this. On a number of his concerns, he had stated that he was happy for them to go to Examination but this did not mean that the Council was 'off the hook'.
- 24.9 With reference to his list of discussion points, the Inspector expected that this would be available prior to the Pre Hearing Meeting.
- 24.10 **Cllr Cubitt** asked whether there was any scenario in which the Inspector would consider a lower 'policy off' figure than 850 dpa. The Inspector replied that the Council would need to persuade him that 850 dpa could be delivered while avoiding environmental harm ('policy on').
- 24.11 **Cllr Golding** noted that a proposal for a new hospital had come forward and the planning application was expected in March – should this be in the Plan? The Inspector replied that it sounded strategic but it was for the Council to consider as it was their Plan.
- 24.12 **Mr Beevers** asked the Inspector to note that anything on biodiversity had been given low priority.

The meeting closed at 4.00pm

