



Basingstoke and Deane

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Regional Spatial Strategy Team
Government Office for the South East
Bridge House
1 Walnut Tree Close
Guildford
GU1 4GA

Our Ref: TR/P&T

24 October 2008

Dear Sir/Madam

**CONSULTATION RESPONSE: SECRETARY OF STATE PROPOSED CHANGES
TO THE DRAFT REGIONAL SPATIAL STRATEGY FOR THE SOUTH EAST OF
ENGLAND**

Thank you for consulting Basingstoke and Deane Borough Council on the Secretary of State's Proposed Changes to the submitted draft South East Plan.

The Council considered its response at its meeting of 9 October 2008, and this covering letter and the attached specific responses to individual policy changes sets out Basingstoke and Deane's formal response to the consultation.

It is recommendation of the Council that it set out in the strongest possible terms to the Secretary of State that:

1. the proposed level of housing development set out for Basingstoke and Deane in the SoS's Proposed Changes to the draft SEP is not based on credible evidence and pre-judges the position as to whether the level of new housing being proposed is actually deliverable. The Borough Council considers that this should be reconsidered and brings into question the validity and 'soundness' of the South East Plan
2. the approach suggested in the *SoS's Proposed Changes* for district housing numbers on an annual minimum average, and the statement that local authorities "*should plan for an upward trajectory of housing completions*" assumes that there neither is nor should be any upper limit on development; this is untenable – an overall target number should be set for the whole of the plan period, and it be left to local authorities to determine the phasing within that through their Local Development Frameworks
3. the higher housing number for the borough of 945 dpa, set out in the *Proposed Changes*, cannot be justified by reference to Basingstoke's New Growth Point status, as this is based on maintaining and enhancing the borough's economic role and delivering committed, planned and known housing and only pertains to the period up to 2016



INVESTOR IN PEOPLE

Chief Executive Tony Curtis
Corporate Director and Returning Officer Dorcas Bunton
Corporate Director Karen Brimacombe

4. the suggestion in the *Proposed Changes* that the land around Basingstoke town is unconstrained is inaccurate. There are significant landscape and environmental constraints including the River Loddon floodplain, a groundwater protection zone, the North Wessex Downs Area of Outstanding Natural Beauty, English Heritage Registered Parks and Gardens, conservation areas, and scheduled ancient monuments,
5. the statement in the *Proposed Changes* about Basingstoke enjoying good rail and motorway connections is insufficient justification for the level of new housing development being proposed for the borough up to 2026.
6. the reference to a requirement of 40-60 hectares of employment land in north Hampshire is based on unpublished evidence. The recent *North Hampshire Employment Land Study* (2008) has seriously questioned the earlier study's assumptions and recommends that this level of employment land is not required in north Hampshire for the plan period. Consequently this reference should be deleted from the final adopted South East Plan and it should be left to the local authorities concerned to determine the level and type of new employment land in their respective boroughs and districts.

The Borough Council also supports the objections raised by the South East England Regional Assembly regarding the deletion of the conditional approach to infrastructure investment and the lack of an acknowledgement that investment is required to meet the current infrastructure deficit, not just to address future development needs

If you require further information please do not hesitate to contact me by phone on (01256) 845489 or by email nicky.linihan@basingstoke.gov.uk.

Yours sincerely



Nicky Linihan (Ms)
Head of Planning and Transport



GOVERNMENT OFFICE
FOR THE SOUTH EAST

Draft South East Plan Comments Form

Office Use Only

Respondent No:

Comment No:

Date Received:

Acknowledged:

If you wish to comment on the Proposed Changes to the Draft South East Plan please:

- Complete all relevant details in Section A – this need only be done once irrespective of how many parts of the RSS you wish to comment on.
- Complete a separate page 2 of the form for each part of the RSS you wish to comment on. Ensure you insert your organisation name (or surname if responding as an individual) on each page 2 and complete Sections B, C & D. You may make copies of this form.
- Type or print clearly in black ink.
- Note that all comment forms will be made available for the public to read – they cannot be treated as confidential.
- E-mail or post (please do not send duplicates) the completed forms to be received by the Government Office for the South East before **5.00pm on Friday 24 October 2008**.
- Alternatively an electronic consultation form is available at www.gose.gsi.gov.uk/planning/regionalPlanning

Please send all responses to:

Regional Spatial Strategy Team
Government Office for the South East
Bridge House
1 Walnut Tree Close
Guildford, GU1 4GA

E-Mail: rss@gose.gsi.gov.uk

Telephone: 01483 882532

Fax: 01483 882489

Section A

Comments submitted by:

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Agent (if applicable):

Organisation
Surname
Title/first name
Address Line 1
Address Line 2
Address Line 3
Postcode
E-Mail
Tel. (day)
Fax

To ensure your comments are taken into account this form must be completed and received by **5.00pm on Friday 24 October 2008**.

Signature..... Date.....

Would you like to be notified of the publication of the final South East Plan?
(Copies will be available to purchase from the Stationery Office, and will be available to download free of charge from the Government Office Website)

Section B

Support / oppose/ comment (please specify)

OPPOSE

Proposed Change Number (e.g. Chap 1 (01))

Chapter 7(4)

Paragraph No. - for comments on Sustainability
Appraisal/Habitats Regulation Assessment Report

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The suggested approach of: "LPAs ensuring delivery of a minimum annual average dwelling requirement" is non-sensical, unrealistic and could not be implemented, and therefore would make it impossible for local authorities to produce a sound Core Strategy. Local authorities cannot demonstrate that the annual housing target can be delivered each year (April-March).

The SoS must be clear as to whether the annual housing target is a minimum figure, which the Council totally opposes, or an average figure over the 20 years 2006-26, which makes far greater sense. The annual housing figures cannot be both minima and an average.

Section D1

If you wish to expand your response please use the space below, and attach additional sheets if necessary with your name on.

Under this minimum annual average housing target approach, planning for, or appraising, the overall level of housing provision cannot be achieved, either for individual local authority areas, or across the region, as it is not possible to judge how many new homes will be delivered by the market in any one year, particularly as the Government has dictated that 'windfalls' (that is unallocated sites) cannot contribute to the overall housing target as they did under previous local plans.

It is essential that the vagaries of the housing market are acknowledged by the SoS and reflected in the adopted *South East Plan* by seeking an overall housing target for authorities for the entire plan period (up to 2026), or in five or ten-year phases, rather than 'average minimum' annual targets. This is particularly pertinent in the case of authorities for which the SoS's *Proposed Changes* identify the need for the phasing of housing delivery in the text of the plan, such as in Basingstoke and Deane, although making no reference to this in the annual average housing figures.

The suggested annual minimum average housing target (referred to in Policy H1) is also inconsistent with the statement in policy H2 that : "...the Local Planning Authorities should plan for an upward trajectory of housing completions that seek to achieve both the district distribution and the relevant sub-regional and rest of County area provisions. ..."

The Secretary of State must recognise and acknowledge in the *South East Plan* that local authorities can only allocate appropriate land to build new homes; that it is predominantly private house builders who build new homes; and there will be many external factors, such as the current "credit-crunch", which influence builders as to whether they build at the rate expected. Local authorities can look to encourage builders to bring forward their sites expeditiously, but this influence is at best marginal, and LPAs certainly cannot plan for an ever increasing number of housing completions. Equally, while LPAs can make every effort to **secure** delivery, they do not have, nor should they have, powers to 'ensure' delivery.

If you are suggesting changes to the draft plan please supply revised wording of policies or supporting text as you wish to see them:

"LPAs will prepare plans, strategies and programmes to secure the delivery of the average annual net additional dwelling requirement as set out in Table H1b."

That is, **DELETE:** reference to "minimum" in the above sentence in Policy H1.

Please ensure that you have written your name at the top of the page and any additional pages. Completed forms should be received in the Government Office for the South East by 5.00pm on Friday 24October 2008. Late responses will not be accepted.

Section B

Support / oppose/ comment (please specify)

OPPOSE

Proposed Change Number (e.g. Chap 1 (01))

Chap.7(4)

Paragraph No. - for comments on Sustainability
Appraisal/Habitats Regulation Assessment Report

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

Oppose the increase in the housing figure for Basingstoke and Deane from 825 dwellings per annum (16,500 dwgs for 2006-26) to 945 dwellings per annum (18,900) in Table H1b, and recommend a net average housing target for the borough of 740 dpa (14,800).

Section D1

If you wish to expand your response please use the space below, and attach additional sheets if necessary with your name on.

The reasons stated in the bullet points outlined in the *SoS's Proposed Changes* for raising the housing target for Basingstoke and Deane are flawed.

- bullet point three: the *Basingstoke and Deane Local Plan Review 1996-2011* reflects the housing figures set out for the borough in the *Hampshire County Structure Plan Review* of 12,060 dwellings (804 dpa) (+ 2000 dwellings, an additional 133 dpa, in reserve to be brought forward should monitoring indicate that these are required). Annual monitoring by the County Council across Hampshire since 2001 has shown that none of the reserve allocation has been required
- that new housing completions in the borough over the recent years (average of 744 dpa, 1996-2008) have been well below that suggested in the submitted draft *South East Plan* (845 dpa), and the existing *Hampshire County Structure Plan Review* (804 dpa), is not a reasoned justification for allocating additional housing in the borough, and indeed it indicates that the draft *South East Plan's* housing provision figure was already challenging
- over the past 17 years, since 1990/91, only in 2007/08 has the annual net housing completion figure for the borough met or exceeded 945 dwellings, and only in four of those years were there more than 800 dwellings built. This level of development is not due to housing land constraints but is more a reflection of levels of completions the market can take in Basingstoke and Deane
- the reference in bullet point three to having a high level of current permissions fails to reflect that a proportion of permissions will not be implemented, particularly in the current period of housing market uncertainty, and that many of the permissions have been windfall sites that were not allocated in the adopted local plan
- as the *SoS's Proposed Changes* makes reference to, the results of Phase Two of the *Basingstoke Water Cycle Study* may well have serious implications for the delivery of new housing in and around Basingstoke. The recognition by the Secretary of State of this on-going issue is therefore supported. However, there remains an outstanding question about the implications for the borough in the context of developing its Core Strategy in the context of the RSS if this is the case.

unconstrained" is incorrect, and disregards the evidence. There are, in fact, significant landscape and environmental constraints around the town, including English Heritage Registered Historic Parks and Gardens, conservation areas, the River Loddon floodplain, scheduled Ancient Monuments, groundwater protection zone and the North Wessex Downs Area of Outstanding Natural Beauty

- the statement in bullet point five regarding Basingstoke enjoying good motorway connections ignores that the M3 junctions 6, 7 and 8 are already often heavily congested at peak times. The Highways Agency has previously highlighted its concerns regarding the capacity of junction 6 of the M3, and this needs to be resolved before additional development can be accommodated. The results of the Basingstoke Transport Assessment modelling work, which should be available by the end of 2008, will help determine the extent to which new development can be accommodated in and around Basingstoke while allowing for the strategic highway network to still operate effectively, but until these results are available the level of development that can be accommodated in and around Basingstoke remains problematic. This issue is seriously impacted by the SoS's proposed removal of infrastructure conditions, which would make it impracticable for the LPA to produce a sound core strategy
- the statement regarding Basingstoke's good railway connections in bullet point five ignores that there is little current spare capacity on the rail infrastructure for a significant number of additional passengers to be accommodated travelling to and from Basingstoke, and does not identify any infrastructure improvements to extend capacity
- the reference to Basingstoke being a growth point is not a reason for additional housing development. The Council's acceptance of growth point status for the town was always predicated on the basis that it was related to economic development, that the housing development was already allocated, and it is only relevant up to 2016.

Section D2

If you are suggesting changes to the draft plan please supply revised wording of policies or supporting text as you wish to see them:

Amend the net annual average housing target set out in Table H1b and WCBV3 for Basingstoke and Deane Borough to be 740 dpa (14,800), subject to the caveat that the Water Cycle Study Phase II provides results that indicate that this level of development is achievable. There should be an indication as to what happens to the shortfall should this level of housing development in Basingstoke and Deane not be able to be achieved.

Section B

Support / oppose/ comment (please specify)

OPPOSE

Proposed Change Number (e.g. Chap 1 (01))

21(6)

Paragraph No. - for comments on Sustainability
Appraisal/Habitats Regulation Assessment Report

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The recent North Hampshire Employment Land Study, commissioned jointly by the relevant local authorities, has seriously questioned an early (unpublished) study's assumptions and recommends that this level of employment land is not required in north Hampshire for the plan period.

Section D1

If you wish to expand your response please use the space below, and attach additional sheets if necessary with your name on.

The 40-60 hectares of employment land in north Hampshire (referred to in Para.21.13 of the proposed changes) was a range proposed by Hampshire County Council in their original submission on the submitted draft South East Plan, and was based entirely on the results of unpublished research, research which Basingstoke and Deane BC always has had strong concerns about, and indeed strongly objected to the reference to the 40-60 ha range in the submitted draft Plan, and at the Examination in Public.

While the EiP Panel specifically welcomed the inclusion of the 40-60 ha range for north Hampshire this view was more related to the general concept of having employment land figures in the RSS, rather than the rationale for this range being appropriate for north Hampshire, for which the County Council has never presented evidence. Indeed the County Council, in its written representation to the EiP, and through its officers at the EiP made it clear that they had significant doubts whether the 40-60 hectares could be justified, and that further work needed to be done to test it.

In 2007 the three north Hampshire local authorities (Basingstoke and Deane, Hart and Rushmoor), together with Hampshire County Council, commissioned 'Economic Growth and Employment Land Requirements in North Hampshire' to examine the level of employment land required for the area for the plan period. This extensive research (available at: www.basingstoke.gov.uk/planning/ldf/employment_land.htm) indicates that the level of employment land required in north Hampshire is likely to be only a fraction of the 40-60 hectares, that there may well be an oversupply from existing commitments in some of the existing sectors, and that many of the assumptions made in the earlier research were fundamentally flawed. Before finalising the adopted South East Plan relating to employment land requirements in north Hampshire the Secretary of State must be fully familiar with the results of this latest research, and the comments of all the relevant authorities.

Retaining the 40-60 hectare range in the final RSS would be 'unsound' as it has not been based on any published evidence base, and indeed the most recent evidence available indicates that these figures grossly exaggerate the level of employment land required in north Hampshire up to 2026. It should be individual LDFs and Core Strategies of the north Hampshire authorities to determine the level of employment land that should be provided. Indeed the Council is looking in more detail as what the implications for smart growth could be on the local economy.

Section D2

If you are suggesting changes to the draft plan please supply revised wording of policies or supporting text as you wish to see them:

Para.21.13: delete "For example a need for 40-60 ha of new employment land has been identified in north Hampshire, that may be substantially met within Basingstoke." And replace with:

"It will be for local authorities in developing their Local Development Frameworks to determine through an evidence-based approach the appropriate level and type of new employment land that will be required in their district."

Section B

Support / oppose/ comment (please specify)

COMMENT

Proposed Change Number (e.g. Chap 1 (01))

Chap.4(9)

Paragraph No. - for comments on Sustainability
Appraisal/Habitats Regulation Assessment Report

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The Council seeks acknowledgement in this policy that the 60% target for development on previously-developed land is a region-wide figure, and that some individual districts and boroughs will exceed the target, whilst others, due to their physical geography will fall below. Furthermore this will vary over the period of a Local Development Framework period.. For example, the town of Basingstoke was developed as an expanded town and this will limit the opportunities for brownfield site development.

Section D1

If you wish to expand your response please use the space below, and attach additional sheets if necessary with your name on.

Section D2

If you are suggesting changes to the draft plan please supply revised wording of policies or supporting text as you wish to see them:

Policy SP3 bullet point ii should be expanded to make explicitly make the point that the reference to the 60% of development on previously-developed land is a region-wide figure, and that: "there will be variances from this target, both below and above, within individual authority areas across the region."

Section B

Support / oppose/ comment (please specify)

OPPOSE

Proposed Change Number (e.g. Chap 1 (01))

Chap.4(21)

Paragraph No. - for comments on Sustainability
Appraisal/Habitats Regulation Assessment Report

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

rural areas should be planned for as dynamic and economically viable communities as well as protecting the countryside and retaining its 'charm and heritage', and the Council agrees with SEERA that the text of the Proposed Changes takes an overly protectionist approach to rural areas, rather than focusing on the need to support positive planning in rural areas to maintain and develop thriving and socially inclusive rural communities

Section D1

If you wish to expand your response please use the space below, and attach additional sheets if necessary with your name on.

Policy should be directed to a more proactive, locally-led, community-led approach to planning with the emphasis on positively supporting these important communities as vibrant and self-sustaining, rather than on centrally-determined constraints, albeit with general guidance – rather than prescription – as to what types of development and change may be more or less desirable and appropriate from a broader national, regional or LPA perspective.

Section D2

If you are suggesting changes to the draft plan please supply revised wording of policies or supporting text as you wish to see them:

The proposed text should be reworded to make it clear that: " rural areas should be planned for as dynamic and economically viable communities as well as protecting the countryside and retaining its 'charm and heritage'." Reference should also be made to: "There is a need to tackle dispersed exclusion and deprivation in rural areas."

Section B

Support / oppose/ comment (please specify)

OPPOSE

Proposed Change Number (e.g. Chap 1 (01))

Chap. 5(23)

Paragraph No. - for comments on Sustainability
Appraisal/Habitats Regulation Assessment Report

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

The Council is surprised and disappointed that the SoS's definition of infrastructure does not make reference to telecommunications. A robust, resilient, reliable and high-performing telecommunications network is essential to the continuing economic health of the South East, and is of particular importance to Basingstoke and Deane, given our designation as a regional growth point and diamond for growth and investment.

Section D1

If you wish to expand your response please use the space below, and attach additional sheets if necessary with your name on.

Telecommunications infrastructure is a key element in the behaviour changes needed if we are to balance employment and population growth against environmental sustainability and the mitigation of climate change. It also underpins significant enhancements in health, social stability and community well being. Recent research undertaken by this borough with Hampshire County Council and the support of GOSE has revealed both significant weaknesses in the present telecommunications infrastructure and significant levels of investment needed to underpin future growth. The fact that this aspect of infrastructure is primarily (but not exclusively) provided by the private sector should not mean that its requirements are not recognised in the RSS. There is clear evidence that the attitudes and regional and (especially) local government is a significant consideration when the private sector makes choices as to where and when to invest in telecommunications infrastructure, and local plans need to be underpinned by strong messages on this in the RSS.

The omission of any reference to telecommunications infrastructure undermines the SoS's increased emphasis on Smart Growth (Ch 6 (12)), which the Council warmly welcomes.

Section D2

If you are suggesting changes to the draft plan please supply revised wording of policies or supporting text as you wish to see them:

The inclusion of appropriate reference to telecommunications infrastructure, under utility infrastructure, within the definition of infrastructure in Box CC2.