



*Basingstoke
and Deane*



Basingstoke and Deane Borough Council

Housing Mix and Lifetime Mobility Standards Supplementary Planning Document and Sustainability Appraisal

Public Consultation Statement of Compliance

June 2007

1.0 Introduction

1.1

In line with the Planning and Compulsory Purchase Act 2004 Regulations and Planning Policy Statement 12 (PPS12) 'Creating Local Development Frameworks', the Council is required to prepare a Statement of Compliance upon the submission of each Local Development Document (LDD).

1.2

The Statement of Compliance states how the arrangements for public consultation have met the requirements of both the Regulations and the Council's Statement of Community Involvement (SCI)

1.3

The SCI, sets out the Council's proposed standards in relation to informing and consulting the community in the preparation of all Local Development Documents (LDDs). It aims to ensure that all sections of the community and other interested parties have the opportunity to get involved from the earliest stages of planning policy preparation.

1.4

This Statement of Compliance sets out details of public consultation undertaken by the Council in the preparation of the Housing Mix and Lifetime Mobility Standards Supplementary Planning Document (SPD) and accompanying Sustainability Appraisal (SA)

It sets out:

- i) the names of any person whom the authority has consulted in connection with the Housing Mix and Lifetime Mobility Standards SPD and SA
- ii) how those persons were consulted
- iii) a summary of the main issues raised in the consultations
- iv) how the issues raised have been addressed within the final SPD and SA

2.0 Background to the Housing Mix and Lifetime Mobility Standards SPD

2.1

The Housing Mix and Lifetime Mobility Standards SPD aims to ensure the provision of an appropriate mix of dwellings to respond to the housing needs of households in the Borough and contribute to the creation of mixed and balanced communities.

2.2

It provides the background and justification for the Housing Mix Policy (Policy C3) in the Basingstoke and Deane Borough Local Plan (1996-2011) and assists with policy implementation through ensuring developers and other interested parties understand how an appropriate mix of housing is to be provided in the Borough.

3.0 Who has been consulted on the SPD and SA

3.1

Basingstoke and Deane's SCI sets out a list of statutory bodies specified by the Regulations and Government Guidance as consultees in the preparation of LDDs.

3.2

Consultation on the Housing Mix and Lifetime Mobility Standards SPD and SA has included the following:

- Specific Consultation Bodies including the statutory consultees, Government Agencies, adjacent local authorities and utilities
- Town and Parish Councils
- Those who made representations to the 'parent' policy, Policy C3 of the Basingstoke and Deane Borough Local Plan (1996-2011) during the Local Plan Review and in previous consultations
- Local Strategic Partnership including sub-groups and network partners
- Elected Members and fellow officers
- Basingstoke and Deane Access Group
- Other groups and organisations with a potential interest in Housing Mix and Lifetime Mobility Standards

3.3

During consultations, copies of the draft documents were made available for public inspection at the following locations:

- Basingstoke and Deane Borough Council
Civic Offices, London Road, Basingstoke
- Basingstoke Library
19/20 Westminster House, Festival Place, Basingstoke, RG21 7LS
- Tadley Library
Mulfords Hill, Tadley RG26 3JE
- Whitchurch Library
Bell Street, Whitchurch RG28 7AE

3.3

Copies of documents were also made available on the Council's website at www.basingstoke.gov.uk/planning/localplan/spd.htm

3.4

A formal notice of public consultation was published in the following local newspapers:

- Basingstoke Gazette
- Andover Advertiser
- Newbury Weekly News

4.0 Initial Consultation

4.1

Initial consultation on the Housing Mix and Lifetime Mobility Standards SPD and SA focused on two documents;

- i) A Scoping Report for the Sustainability Appraisal
- ii) A Draft Issues and Options for the SPD

4.2

Both the SA Scoping Report and the Draft Issues and Options were available for public consultation between the 11th September 2006 and 23rd October 2006

SA Scoping Report

4.3

The Scoping Report formed the first stage in the production of the SA for the Housing Mix and Lifetime Mobility Standards SPD. The SA provides an assessment of the economic, social and environmental effects that are likely to arise from implementation of the SPD.

4.4

The aim of the Scoping Report was to ensure that the relevant sustainability issues were considered in the production of the draft SPD.

4.5

The Scoping Report was sent to the then four statutory consultees (Countryside Agency, English Heritage, English Nature and the Environment Agency) and key local stakeholders on the 11th September 2006. Two responses were received from the Environment Agency and Natural England (Countryside Agency, English Nature and Rural Development Service). The Environment Agency had 'no comments' to make on the Scoping Report. The comments from Natural England emphasised the need to focus on environmental targets and indicators alongside social and economic. This has been addressed in the production of the SA, where the Sustainability Objectives are subdivided into environmental, social and economic groupings.

Draft Issues and Options

4.6

The Issues and Options document aimed to clarify the issues that should be addressed within the draft SPD. It set out a series of questions relating to the implementation of the Housing Mix Policy (Policy C3) in the Basingstoke and Deane Borough Local Plan (1996-2011)

4.7

Following the consultation period, seven responses were received. The table in Appendix 1 outlines who responded, the main issues raised and the Council's response.

5.0 Formal Consultation

5.1

Formal public consultation on the Draft Housing Mix and Lifetime Mobility Standards SPD and SA took place between 12th February and 26th March 2007.

Sustainability Appraisal

5.2

The SA provides an assessment of the economic, social and environmental effects that are likely to arise from implementation of the SPD.

5.3

The Sustainability Appraisal was sent to three statutory consultees (English Heritage, Natural England and the Environment Agency) and key local stakeholders on the 12th February 2007. Two responses were received from Natural England and the Environment Agency. Both stated that they had no comments to make regarding the document.

Draft Supplementary Planning Document

5.4

The Draft Supplementary Planning Document outlined a proposed method for implementing Policy C3 of the Local Plan.

5.5

Following the consultation period, twelve responses were received. The table in Appendix 2, outlines who responded, the main issues raised and the Council's response.

6.0 Summary

6.1

This statement demonstrates that the public consultation undertaken by the Council, on the Housing Mix and Lifetime Mobility Standards SPD and accompanying Sustainability Appraisal has met the Government requirement for consultation on SPDs as set out in Regulation 17 of the Planning and Compulsory Purchase Act 2004.

6.2

The SPD and SA has also followed the Council's standards for community involvement as set out on page 15 of the SCI.

Appendix 1: Consultation Statement
Issues and options Document

Issue	Option	Consultee	Comments Received	BDBC Response
<p>Is a Housing Mix and Lifetime Mobility Standards SPD needed?</p>	<p>1) Guidance is provided in the form of a formal Housing Mix and Lifetime Mobility Standards SPD</p>	Overton Society	Support the production of a formal Housing Mix and Lifetime Mobility Standards SPD	Support noted
		Home Builders Federation	Support the production of a formal Housing Mix and Lifetime Mobility Standards SPD as it ensures the consistent implementation of the Housing Mix Policy and clearly outlines what the Council's expectations are.	Support noted
		Old Basing and Lychpit Parish Council	Support the production of a formal Housing Mix and Lifetime Mobility Standards SPD	Support noted
	<p>2) Guidance is provided in an informal case by case basis</p>	Barton Willmore on behalf of David Wilson Homes	Support the provision of guidance on an informal case by case basis. The Inspectors Report (2005) identified the need to reflect differences between sites and changing market conditions. The imposition of a rigid SPD, unable to respond to emerging trends in housing supply and demand, contradicts national, regional and local policy and is therefore not sound in planning terms	<p>The Inspectors Report (2005) suggested the simplification of the previous Housing Mix Policy within the Local Plan, with more detail set out within an SPD. The Council has taken on board these recommendations and adopted a less detailed Housing Mix Policy which is to be supported by further information within an SPD. Whilst a Policy can not be changed without a full review of the Development Plan Document, the SPD can be independently reviewed. By setting a broad policy with the detail included in a separate SPD it is possible to make amendments in response to any emerging trends, thereby maintaining a level of flexibility. The Council maintains an awareness of any emerging trends or issues through its Annual Monitoring Report which assesses whether planning policies are achieving their objectives. It would be difficult to implement the policy consistently if guidance was to be given on a case by case basis.</p>

Issue	Option	Consultee	Comments Received	BDBC Response
		Chineham Parish Council	Support the provision of guidance on an informal case by case basis	The Inspectors Report (2005) suggested the simplification of the previous Housing Mix Policy within the Local Plan, with more detail set out within an SPD. The Council has taken on board these recommendations and adopted a less detailed Housing Mix Policy which is to be supported by further information within an SPD. Whilst a Policy can not be changed without a full review of the Development Plan Document, the SPD can be independently reviewed. By setting a broad policy with the detail included in a separate SPD it is possible to make amendments in response to any emerging trends, thereby maintaining a level of flexibility. The Council maintains an awareness of any emerging trends or issues through its Annual Monitoring Report which assesses whether planning policies are achieving their objectives. It would be difficult to implement the policy consistently if guidance was to be given on a case by case basis.
	3) There is an alternative approach that can be consistently applied across the Borough	The Planning Bureau on behalf of Mc-Carthy and Stone	There should be a balance of both Option 1 and Option 2 in that there should be a specific policy but with some form of flexibility depending on each individual case	The Inspectors Report (2005) suggested the simplification of the previous Housing Mix Policy within the Local Plan, with more detail set out within an SPD. The Council has taken on board these recommendations and adopted a less detailed Housing Mix Policy which is to be supported by further information within an SPD. The SPD will provide information as to how Policy C3 will be implemented. However the Council will take a pragmatic approach to each development proposal and aims to use the SPD as a starting point whilst also taking into account the local circumstances and context, in line with the other policies in the Local Plan

Issue	Option	Consultee	Comments Received	BDBC Response
		Bellway Housing Trust Ltd	Support the flexibility of the Housing Mix Policy which allows for sensible consideration of the characteristics and constraints, including the surrounding area and housing market, essential in arriving at a decision about the final form a development will take. Not however convinced that further SPD guidance is required and concerned that an approach specifying certain percentages and population will not allow for individual site appraisal	The Inspectors Report (2005) suggested the simplification of the Housing Mix Policy within the Local Plan, with more detail set out within an SPD. The Council has taken on board these recommendations and adopted a less detailed Housing Mix Policy which is to be supported by further information within an SPD. Whilst a Policy cannot be changed without a full review of the Development Plan Document, the SPD can be independently reviewed. By setting a broad policy with the detail included in a separate SPD it is possible to make amendments in response to any emerging trends, thereby maintaining a level of flexibility. The Council maintains an awareness of any emerging trends or issues through its Annual Monitoring Report which assesses whether planning policies are achieving their objectives.
How should the Council define what housing mix should be provided in which locations?	1) The level of housing mix will be negotiated based on access to facilities, services and public transport. The settlements with the highest levels of accessibility will provide 50% smaller dwellings with the smallest settlements providing 30%	The Planning Bureau on behalf of Mc-Carthy and Stone	Support the approach that the percentage of housing mix will be based on access to facilities, services and public transport as it provides a set of standards that are easy for developers to follow. There should however be some level of flexibility based not only on location but also on the type of development	Support noted. The SPD aims to support Policy C3 by providing information as to how the Policy will be implemented. However the Council will take a pragmatic approach to each development proposal and aims to use the SPD as overall guidance whilst also assessing local circumstances and context, in line with other policies in the Local Plan
	2) The percentage sought should depend on site specific circumstances and should be based on negotiations with the applicant	Home Builders Federation	Support the approach that the percentage of smaller units sought within a development should depend on site specific circumstances. Sites should be considered on their own merits and the level of small units based on negotiations with the applicant. The use of percentages for different levels of accessibility (Option 1) is too complex and prescriptive	Support noted The Council will take a pragmatic view to each development proposal and assess local circumstances and context, in line with other policies in the Local Plan. However the production of a Housing Mix and Lifetime Mobility Standards SPD provides a framework of overall guidance for the level of housing mix that will be sought within particular locations.

Issue	Option	Consultee	Comments Received	BDBC Response
		Barton Willmore on behalf of David Wilson Homes	Support the approach that the percentage of smaller units sought within a development should depend on site specific circumstances. Housing mix is a local issues and therefore should be considered on a site by site basis. The Inspectors Report (2005) put forward recommendations to reflect the differences between sites and changing market conditions. Reaching decisions on location and mix requires a flexible approach whereby a correlation is reached between Housing Needs Assessment and Housing Mix Policy. By implementing a rigid SPD, which ignores site specific characteristics and applies general standards and benchmarks, undermines the individuality of sites and jeopardises their uniqueness	Support noted The Council will take a pragmatic view to each development proposal and assess local circumstances and context, in line with other policies in the Local Plan. However the production of a Housing Mix and Lifetime Mobility Standards SPD provides a framework of overall guidance for the level of housing mix that will be sought within particular locations. The Council maintains an awareness of any emerging trends or issues through its Annual Monitoring Report which assesses whether planning policies are achieving their objectives. By setting the detail for Policy C3 in a SPD it is possible to make amendments in response to any emerging trends thereby maintaining a level of flexibility.
		Chineham Parish Council	Support the approach that the percentage of smaller units sought within a development should depend on site specific circumstances	Support noted The Council will take a pragmatic view to each development proposal and assess local circumstances and context, in line with other policies in the Local Plan. However the production of a Housing Mix and Lifetime Mobility Standards SPD provides a framework of overall guidance for the level of housing mix that will be sought within particular locations. The Council maintains an awareness of any emerging trends or issues through its Annual Monitoring Report which assesses whether planning policies are achieving their objectives. By setting the detail for Policy C3 in a SPD it is possible to make amendments in response to any emerging trends thereby maintaining a level of flexibility.

Issue	Option	Consultee	Comments Received	BDBC Response
		Old Basing and Lychpit Parish Council	Support the approach that the percentage of smaller units sought within a development should depend on site specific circumstances	Support noted The Council will take a pragmatic view to each development proposal and assess local circumstances and context, in line with other policies in the Local Plan. However the production of a Housing Mix and Lifetime Mobility Standards SPD provides a framework of overall guidance for the level of housing mix that will be sought within particular locations. The Council maintains an awareness of any emerging trends or issues through its Annual Monitoring Report which assesses whether planning policies are achieving their objectives. By setting the detail for Policy C3 in a SPD it is possible to make amendments in response to any emerging trends thereby maintaining a level of flexibility.
	3) The percentage sought should be dependent on the size of the site	Overton Society	Support the approach that the percentage of smaller units sought within a development should be dependent on the size of the site.	Support noted. However, it is felt that defining a sliding scale based on accessibility is the most appropriate way to implement the policy. That way, the most accessible sites will contain the highest proportion of 1 and 2 bedroom dwellings.
	4) The same percentage should be applied to all housing developments where there is a net gain	No comments received on this option		
	5) Is a sliding scale based on accessibility appropriate	Overton Society	No a sliding scale based on accessibility is not appropriate	Noted. However, the sliding scale is based on access to facilities, services and public transport, as recommended by the Local Plan Inquiry Inspector and as set out within policy C3, and is intended as the starting point for negotiations on all sites where there is a net gain of 2 dwellings or more. Defining a sliding scale based on accessibility issues ensures that the policy will be implemented consistently through the development control process and provides certainty about what is expected to be provided in each location

Issue	Option	Consultee	Comments Received	BDBC Response
		Home Builders Federation	No a sliding scale based on accessibility is not appropriate, as there are many more interrelated variables that determine the preferred housing mix than accessibility, such as site size and access to services	The sliding scale is based on access to facilities, services and public transport, as recommended by the Local Plan Inquiry Inspector and as set out within policy C3, and is intended as the starting point for negotiations on all sites where there is a net gain of 2 dwellings or more. Defining a sliding scale based on accessibility issues ensures that the policy will be implemented consistently through the development control process and provides certainty about what is expected to be provided in each location. It is recognised, however, that there may be exceptions where a higher or lower proportion would be appropriate as a result of detailed design considerations
		The Planning Bureau on behalf of McCarthy and Stone	No a sliding scale based on accessibility is not appropriate	The sliding scale is based on access to facilities, services and public transport, as recommended by the Local Plan Inquiry Inspector and as set out within policy C3, and is intended as the starting point for negotiations on all sites where there is a net gain of 2 dwellings or more. Defining a sliding scale based on accessibility issues ensures that the policy will be implemented consistently through the development control process and provides certainty about what is expected to be provided in each location. It is recognised, however, that there may be exceptions where a higher or lower proportion would be appropriate as a result of detailed design considerations and the physical characteristics of the site or the character of the area. However, the starting point will always be for a range of units and strong evidence will need to be provided if this is not to be followed on an individual site

Issue	Option	Consultee	Comments Received	BDBC Response
		Chineham Parish Council	No a sliding scale based on accessibility is not appropriate	The sliding scale is based on access to facilities, services and public transport, as recommended by the Local Plan Inquiry Inspector and as set out within policy C3, and is intended as the starting point for negotiations on all sites where there is a net gain of 2 dwellings or more. Defining a sliding scale based on accessibility issues ensures that the policy will be implemented consistently through the development control process and provides certainty about what is expected to be provided in each location. It is recognised, however, that there may be exceptions where a higher or lower proportion would be appropriate as a result of detailed design considerations and the physical characteristics of the site or the character of the area. However, the starting point will always be for a range of units and strong evidence will need to be provided if this is not to be followed on an individual site
		Old Basing and Lychpit Parish Council	Yes a sliding scale based on accessibility is appropriate	Noted
How should the Council ensure that small units are retained to improve and maintain affordability in the housing market?	1) Implement a restriction on gross floor area of 70 square metres on all sites	Overton Society	Support the implementation of a restriction on gross floor area of 70 square metres, on all sites	Support noted.
		Chineham Parish Council	Support the implementation of a restriction on gross floor area of 70 square metres, on all sites	Support noted
		Old Basing and Lychpit Parish Council	Support the implementation of a restriction on gross floor area of 70 square metres, on all sites	Support noted
	2) Introduce a threshold at which point the 70 square metre floor area restriction applies	No comments received on this option		

Issue	Option	Consultee	Comments Received	BDBC Response
	<p>3) There is an alternative approach that can be consistently applied across the Borough</p>	Home Builders Federation	<p>Do not support either Option 1 or Option 2, as disagree with placing any restriction on gross floor area. It is a concern that the LPA use SPD's as a mechanism for altering the adopted Local Plan Policy. The inclusion of limits to floorspace would be a serious misuse of the SPD as a planning policy tool. It does not form part of the development plan and if the LPA wish to restrict floorspace they should pursue this through the proper procedures; namely a review of the Local Plan. There should be no restriction on floorspace as the market will; respond to any such demands for small dwellings. The provision of small dwellings is also successfully facilitated by PPG3 with the requirement to build higher densities.</p>	<p>The Council aims to ensure that the majority of small dwellings provide basic and therefore relatively inexpensive accommodation through the restriction of gross floorspace. The restriction of gross floor area for small dwellings forms part of the supporting text for the Housing Mix Policy (Policy C3) in which it states that; 'In order to ensure the majority of small dwellings will provide basic and therefore relatively inexpensive accommodation, the Borough Council will aim to achieve a standard 80% of the small dwellings (maximum of 2 bedrooms) on any development having a gross floor area not exceeding 70 square metres' Policy C3 and the supporting text form part of the Basingstoke and Deane Local Plan (1996-2011) which was adopted in July 2006, following extensive public consultation, a review by an Independent Inspector and approval by Council Members. The Housing Mix and Lifetime Mobility Standards SPD can not therefore alter Policy C3 or the supporting text but aims to provide additional information to support implementation.</p>
		The Planning Bureau on behalf of McCarthy and Stone	<p>Do not support either Option 1 or Option 2, as do not feel it is ethical to restrict home owners from improving their home. This is not the correct way to control affordability. The Shared Ownership Schemes are a popular way of controlling the likelihood of the price of the property rising significantly.</p>	<p>The Council aims to ensure that the majority of small dwellings provide basic and therefore relatively inexpensive accommodation through the restriction of gross floorspace. The restriction of gross floor area for small dwellings forms part of the supporting text for the Housing Mix Policy (Policy C3), in which it states that; 'In order to ensure the majority of small dwellings will provide basic and therefore relatively inexpensive accommodation, the Borough Council will aim to achieve a standard 80% of the small dwellings (maximum of 2 bedrooms) on any development having a gross floor area not exceeding 70 square metres' Policy C3 and the supporting text form part of the Basingstoke and Deane Local Plan (1996-2011) which was adopted in July 2006, following extensive public consultation, a review by an Independent Inspector and approval by Council Members. The Housing Mix and Lifetime Mobility Standards SPD cannot therefore alter Policy C3 or the supporting text but aims to provide additional information to support implementation.</p>

Issue	Option	Consultee	Comments Received	BDBC Response
		Barton Willmore on behalf of David Wilson Homes	Believe that the restriction on gross floor area should be negotiated on a site by site basis. There is strong evidence to support the need for small units; however there is no justification to suggest that the release of small units below a certain floorspace size will guarantee affordability in the long term and such restrictions will not enable families to grow. The Council should not seek to overtly restrict housing provision in such a manner and should adopt a more flexible and responsive approach which responds to site specific issues and copes with dynamic changes in housing need. The Inspector sought to achieve a flexible range of 30-50% market dwellings as small units. Imposing a fixed percentage of small units with a restricted floor area removes some of the scope for flexibility	The Council aims to ensure that the majority of small dwellings provide basic and therefore relatively inexpensive accommodation through the restriction of gross floorspace. The restriction of gross floor area for small dwellings forms part of the supporting text for the Housing Mix Policy (Policy C3). It states that the Council will aim to achieve a standard 80% of the small dwellings (maximum of 2 bedrooms) on any development having a gross floor area not exceeding 70 square metres. This is however an overall aim and the Council will take a pragmatic view to each proposal based on local circumstances and context.
	4) Does restricting floor areas conflict with the need to provide homes to Lifetime Mobility Standards and should more flexibility therefore be given	Overton Society	Believe that restricting floor area does conflict with the provision of homes to Lifetime Mobility Standards. More flexibility should therefore be given	The restriction on gross floor area only applies to 80% of small market dwellings (2 bedrooms or less) on any development. Consequently 20% of small market dwellings and any dwellings over 2 bedrooms in size do not have a restriction on gross floor area and may therefore be best suited to accommodating the Lifetime Mobility Standards, as may any other dwellings on site.
		Home Builders Federation	Believe that restricting floor area does conflict with the provision of homes to Lifetime Mobility Standards	The restriction on gross floor area only applies to 80% of small market dwellings (2 bedrooms or less) on any development. Consequently 20% of small market dwellings and any dwellings over 2 bedrooms in size do not have a restriction on gross floor area and may therefore be best suited to accommodating the Lifetime Mobility Standards, as may any other dwellings on site.

Issue	Option	Consultee	Comments Received	BDBC Response
How should the Council ensure that houses are accessible and usable by people regardless of age or disability	1) 15% of houses on all sites should be constructed to Lifetime Mobility Standards	The Planning Bureau on behalf of Mc-Carthy and Stone	Support the approach that 15% of houses on all sites are constructed to Lifetime Mobility Standards. This approach provides clarity to developers and allows them to see from an early stage what to work towards. Options 2 and 3 are not specific enough and would mean developers are blind as to what the LPA expects. There should however be some form of flexibility as to the type of the development and whether LMS is appropriate.	Support noted The Housing Mix Policy states that the Council aims to achieve an overall 15% of new homes in the Borough to Lifetime Mobility Standards. As this is an overall aim the Council will take a pragmatic approach and assess each development proposal against local circumstances and context.
	2)The proportion of homes to be constructed to Lifetime Mobility Standards should depend on the size of the site, with the highest proportion provided on the largest sites	Overton Society	Support the approach that the proportion of homes designed to Lifetime Mobility Standards is based on the size of the site.	Support noted However this would require us to define what sites are large and this could therefore result in an overly prescriptive approach
		Chineham Parish Council	Support the approach that the proportion of homes designed to Lifetime Mobility Standards is based on the size of the site.	Support noted
	3) The proportion of homes to be constructed to Lifetime Mobility Standards should be negotiated on a site by site basis	Barton Willmore on behalf of David Wilson Homes	Accept and support the Council's intention to provide homes for the aged and those with disabilities. However oppose any arbitrary requirement and consider any provision of homes constructed to Lifetime Mobility Standards should be negotiated on a site by site basis. Applying an SPD may well increase supply of Lifetime Homes but whether or not this would address critical demand is questionable. Housing Needs Assessments coupled with a flexible Housing Mix Policy would constitute a more efficient approach to delivery of new homes, to meet the needs of all the community.	The objective of achieving an overall 15% of new homes in the Borough designed to Lifetime Mobility Standards forms part of the Housing Mix Policy (Policy C3.) Policy C3 was adopted by the Council in July 2006, as part of the Basingstoke and Deane Borough Local Plan (1996-2011), following extensive public consultation, a review by an Independent Inspector and approval by Council Members. The Housing Mix and Lifetime Mobility Standards SPD can not therefore alter Policy C3 or the supporting text but aims to provide additional information to support implementation. However the Council will take a pragmatic approach to each development proposal and aims to use the SPD as overall guidance whilst also taking into account the local circumstances and context, in line with the other policies in the Local Plan
		Old Basing and Lychpit Parish Council	Support the approach that the proportion of homes constructed to Lifetime Mobility Standards is negotiated based on site specific circumstances	Support noted

Issue	Option	Consultee	Comments Received	BDBC Response
	<p>4) There is an alternative approach that can be consistently applied across the Borough</p>	<p>Home Builders Federation</p>	<p>Do not support any of the options for Lifetime Mobility Standards as do not believe that the LPA has the remit to enforce the provision of Lifetime Homes. Do not believe that the application of a percentage of Lifetime Homes on a development will mean that the homes will be bought by people with mobility needs or those who may come to have mobility needs. This is unless the homes are sold to a niche market such as bungalows. Believe that Lifetime Mobility Standards should come through the upgrading of building regulations by including all or part of the elements in Part M. It is believed that those whose personal circumstances change will retrofit their existing home or seek suitable alternative accommodation. A more sensible approach is to have government grants to assist people in adapting dwellings.</p>	<p>The objective of achieving an overall 15% of new homes in the Borough designed to Lifetime Mobility Standards forms part of the Housing Mix Policy (Policy C3.) Policy C3 was adopted by the Council in July 2006, as part of the Basingstoke and Deane Borough Local Plan (1996-2011), following extensive public consultation, a review by an Independent Inspector and approval by Council Members. The Housing Mix and Lifetime Mobility Standards SPD can not therefore alter Policy C3 or the supporting text but aims to provide additional information to support implementation. Whilst some of the Lifetime Mobility Standards criteria fall under the requirements of Part M of the Building Regulations, Part M is not as extensive in its requirements. The Housing Mix and Lifetime Mobility Standards SPD will therefore provide guidance on Lifetime Mobility Standards to assist applicants in meeting this criteria and to clarify the areas in which the standards exceed the requirements of Building Regulations</p>

Question	Consultee	Comments Received
Are the policies/plans/programmes/strategies and initiatives that have been reviewed appropriate?	Natural England	The list of documents for review is comprehensive
	Environment Agency	No comment
Do you know of any further baseline indicators that might provide useful information?	Natural England	None of the baseline indicators refer to sustainability, the environment or impacts on landscape value and recreational access to the countryside. Advise that some indicators are formulated as follows; % of new houses built on Brownfield sites, % of new development built incorporating some aspect of ecological design
	Environment Agency	No comment
Are the key sustainability issues the correct ones?	Natural England	Should mention sustainability
	Environment Agency	No comment
Do the SA objectives encompass all the key sustainability issues?	Natural England	There are no indicators regarding sustainable construction.
	Environment Agency	No comment

Appendix 2: Consultation Statement Draft Supplementary Planning Document

Consultees	Comments Received	BDBC Response
Environment Agency	No comments to make regarding the documents	Noted
South East England Regional Assembly	No comments to make regarding the Draft SPD	Noted
Natural England	No comments to make regarding the documents. The documents do not have any significant impact on the core objectives of Natural England	Noted
Charles Planning Associates on behalf of Antler Homes Wessex Limited	<p>General comments: Antler is supportive of the Council's recognition that housing mix should not simply focus on providing smaller units. It is essential that the SPD ensures a flexible approach to housing mix, meeting the needs of the Borough's population, whilst responding to individual site circumstances.</p> <p>Paragraph 7.2: Antler supports the Councils' recognition that its Housing Mix Policy should not be applied rigidly in all circumstances and that each site should be treated on its own merits having regard to all relevant material planning considerations It is unclear how the Council has arrived at its schedule of settlements set out in the bullet points. Policy D5 of the adopted Local Plan lists 21 settlements where development is considered acceptable. However the SPD only list 17 settlements where the percentage of small units should be between 35-50%. No justification has been provided to demonstrate why the remaining 4 no settlements are only considered to require a 30% provision. The Council should provide clarification on why the settlements within each bullet point in the range have been chosen in the interests of transparency.</p> <p>Paragraph 8.1-8.2: Whilst Antler acknowledges the supporting text of Policy C3 refers to a requirement of 80% of all 2 bedroom units having a floor are not exceeding 70sqm, it is considered that too much reliance is placed on this in the SPD. The Inspector recommended the deletion of this floorspace standard on the basis that a more simplified policy was required. Antler agrees with the Inspectors view and believes that the Council should not attach such weight to the floorspace standard in the SPD.</p>	<p>Support Noted. The overall aim of Policy C3 is to provide mixed and inclusive communities. The SPD therefore provides information as to how the Policy will be implemented. However it is recognised that individual assessments will need to be made based on local circumstances and context, in line with other policies in the Local Plan.</p> <p>The sliding scale is based on access to facilities, services and public transport, as recommended by the Local Plan Inquiry Inspector and as set out in Policy C3. It is intended as the starting point for negotiations on all sites where there is a net gain of 2 or more dwellings and aims to ensure that the policy will be implemented consistently through the Development Control process and provides certainty about what is expected to be provided in each location. However in light of the comments received and to avoid being too prescriptive, the Draft SPD has now been altered so that the sliding scale is expressed as a range of percentages.</p> <p>It is correct that Policy D5 of the Local Plan lists 21 settlements. However 2 settlements (Dummer and Cliddesden) have accidentally been named twice within Policy D5 of the Interim copy of the Adopted Local Plan. Unfortunately though, 2 other settlements (Sherfield on Loddon and St Mary Bourne) within Policy D5 have been overlooked in the initial drafting of the Housing Mix and Lifetime Mobility Standards SPD. These two settlements have now been added to the SPD and the schedule of settlements laid out in the sliding scale of the Draft Housing Mix and Lifetime Mobility Standards SPD now corresponds directly with Policy D5 of the Adopted Local Plan.</p> <p>Further justification on why the settlements within each bullet point in the sliding scale have been chosen, has now been included within the SPD in the interests of transparency.</p> <p>Policy C3 and the supporting text form part of the Basingstoke and Deane Local Plan (1996-2011) which was adopted in July 2006, following extensive public consultation, a review by an Independent Inspector and approval by Council members. The Housing Mix and Lifetime Mobility Standards SPD can not therefore alter Policy C3 or the supporting text but aims to provide additional information to support implementation. Any change to the Policy itself needs to be made through the Local Development Framework process and all consultees will be included in any future reviews.</p>

Consultees**Comments Received****BDBC Response**

Home Builders Federation

General Comments: The HBF wish to ensure that the Council are reminded of their continued objections and serious flaws in the document. The HBF supports the use of the SPD if it conforms to the requirements of PPS12 to expand and clarify the saved policy. However the HBF believe the SPD is being used to impose additional policy requirements and therefore do not support the use of the SPD in this way.

The HBF wish to highlight some important statements in PPS3, which need to be taken into account in the production of the SPD, and interpret this to mean that the LPA should identify through a Housing Market Assessment, the required type and mix of housing, the onus then being upon the developer to submit appropriate development proposals on a site by site basis. The HBF believe that the Council should produce their HMA before adopting this SPD and make sure the SPD expresses the HMA findings and expresses that each site will be considered on its own merits.

Paragraph 7: The HBF object to all of the requirements of the scaling approach to housing mix upon sites. It is too restrictive to achieve a realistic mix of housing on any given site, which takes account of all the necessary factors including market conditions and the site context. The scaling mechanism could be used as an indicator but it should be the starting point for negotiation.

Paragraph 8: The HBF continue to be concerned about the restrictive floorspace. This requirement takes no account of market considerations and the potential for an over supply of small units. The HBF are concerned that if the market for small dwellings declines this requirement could be a barrier to delivering the Council's housing target and delivering a range of dwelling types. The HBF believe that the industry should be able to be responsive to local market conditions. The HBF are particularly concerned that the Council is applying a housing association requirement upon market providers and believe it should be omitted from the SPD.

Paragraph 9: The HBF considers that the application of 15% Lifetime Homes Standards lacks sound basis. It assumes that all those with mobility difficulties have the means and opportunity to change their residential circumstances and are fortunate enough to secure an appropriate open market unit. Occupation of such units would not be purely based on need but a full range of market forces. The HBF consider that appropriate central government action needs to be taken on this issue through building regulations and believe it is not an issue for the LPA to influence.

iNoted. The Council confirms that it is not altering Policy C3 of the Basingstoke and Deane Adopted Local Plan (1996-2011) or the Policy's supporting text. The Housing Mix and Lifetime Mobility Standards SPD will provide additional information to support implementation of the adopted Policy.

The sliding scale is based on access to facilities, services and public transport, as recommended by the Local Plan Inquiry Inspector and as set out in Policy C3. It is intended as the starting point for negotiations on all sites where there is a net gain of 2 or more dwellings and aims to ensure that the policy will be implemented consistently through the Development Control process and provides certainty about what is expected to be provided in each location. However in light of the comments received and to avoid being too prescriptive, the Draft SPD has now been altered so that the sliding scale is expressed as a range of percentages. Further justification on why the settlements within each bullet point in the sliding scale have been chosen, has also now been included within the SPD in the interests of transparency.

In paragraph 7.2, the Draft SPD does also recognise that there may be exceptions where a higher or lower proportion would be appropriate as a result of detailed design considerations, the physical characteristics of the site, the character of the area of local housing need and existing provision. However the starting point will always be for a range of units and sufficient evidence will need to be provided if this is not to be followed on an individual site.

Any change to the Policy itself needs to be made through the Local Development Framework process and will be based on the findings of the Housing Market Assessment. All consultees will be included in any future reviews of the Policy

The restriction on gross floor area for small dwellings forms part of the supporting text for the Housing Mix Policy in the Basingstoke and Deane Borough Local Plan (1996-2011). The Plan was adopted in July 2006 following extensive public consultation, a review by an Independent Inspector and approval by Council Members. The Housing Mix and Lifetime Mobility Standards SPD can not therefore alter Policy C3 or the supporting text but aims to provide additional information to support implementation.

The objective of achieving an overall 15% of new homes in the Borough designed to Lifetime Mobility Standards forms part of the Housing Mix Policy. As outlined in paragraph 9.1 of the Draft SPD, this figure has been derived from the knowledge that 15% of the population have mobility difficulties and with an ageing population it is probable that this figure will increase. Policy C3 was adopted by Council in July 2006, as part of the Basingstoke and Deane Borough Local Plan, following extensive public consultation, a review by an independent Inspector and approval by Council Members. The Housing Mix and Lifetime Mobility Standards SPD can not therefore alter Policy C3 or the supporting text but aims to provide additional information to support implementation. Whilst some of the Lifetime Mobility Standards criteria fall under the requirements of Part M of the Building Regulations. Part M is not as extensive in its requirements. The Housing Mix and Lifetime Mobility Standards SPD will therefore provide guidance on Lifetime Mobility Standards to assist applicants in meeting the criteria and to clarify the areas in which the standards exceed the requirements of Building Regulations

Consultees**Comments Received****BDBC Response**

RPS Planning and Development Ltd on behalf of Fairview New Homes.

Paragraph 7: Fairview New Homes agree that the SPD should identify the starting point for negotiations regarding housing mix. However they recommend that a sentence be added to state that housing mix provisions outlined in this section is only guidance and the specific mix will be determined on a site by site basis.

Fairview New Homes object to the sliding scale in paragraph 7.2. Believe the Council should not impose a level of restriction on housing development that goes beyond normal responsibilities of planning. Fairview New Homes considers that the concept imposes an unacceptable level of control on the house building industry as it takes away the ability of the private sector to respond to market demands, it erodes the ability of the private sector to assess market demand in an area and respond with innovation and initiative, it takes away the ability of house builders to assess the viability of individual schemes and to establish the appropriate mix to make this viable, there is limited scope to react or respond quickly to changes in the market. Fairview New Homes therefore strongly requests that it is made clear that there will always be an appropriate level of flexibility for house builders to best determine the appropriate requirements of a site based on market and commercial considerations.

The sliding scale is based on access to facilities, services and public transport, as recommended by the Local Plan Inquiry Inspector and as set out in Policy C3. It is intended as the starting point for negotiations on all sites where there is a net gain of 2 or more dwellings and aims to ensure that the policy will be implemented consistently through the Development Control process and provides certainty about what is expected to be provided in each location. However in light of the comments received and to avoid being too prescriptive, the Draft SPD has now been altered so that the sliding scale is expressed as a range of percentages. Paragraph 7.2 of the Draft SPD also recognises that there may be exceptions where a higher or lower proportion would be appropriate as a result of detailed design considerations and the physical characteristics of the site or the character of the area. However the starting point will always be for a range of units and strong evidence will need to be provided if this is not to be followed on an individual site.

Barton Willmore on behalf of David Wilson Homes (Southern) Ltd

General Comments: Set against dynamic housing market trends the imposition of unresponsive guidance raises serious concerns over the future deliverability of appropriate housing mix. The existing Policy and housing needs assessment offers sufficient scope and flexibility to address all issues of need and affordability. The imposition of a rigid SPD, unable to respond to emerging trends in housing supply and demand, renders the relationship between policy and information emerging from assessments and monitoring reports defunct and contradicts national, regional and local policy.

Paragraph 7: The draft SPD categorises housing mix thresholds based on location and ignores comments from the Inspectors Report recommending that site specific considerations and market conditions be taken into account. Housing Mix is a localised issue and should be considered on a site by site basis with each case assessed on its individual merits. Reaching decisions on location and mix requires a flexible approach whereby a correlation is reached between HNA and Housing Mix Policy. By implementing a rigid SPD which ignores site specific circumstances and applies general standards and benchmarks, undermines the individuality of sites and jeopardises their uniqueness.

Paragraph 8: There is incomplete justification to suggest that the release of small units below a certain floorspace will guarantee affordability in the long term and it does not enable families to grow within existing accommodation. The LPA should not seek to overtly restrict housing provision in this manner. This requires a flexible and responsive approach incorporating structured and monitored assessment of housing need. The Inspector sought to achieve a flexible range which gave scope to address site specific issues and market fluctuations. By imposing a gross floor area on a fixed percentage of small units removes this scope.

Paragraph 9: We support in principle the application of LMS and commend the Councils proposed approach of negotiating provision with reference to site circumstances in terms of practicality, delivery and accessibility issues.

The current Policy does aim to maintain some flexibility. The Draft SPD states that the sliding scale is intended as a starting point, but recognises in paragraph 7.2 that there may be exceptions where a higher or lower proportion would be appropriate as a result of detailed design considerations, the physical characteristics of the site, the character of the area or local housing need and existing provision. Whilst the Housing Mix Policy within the Adopted Basingstoke and Deane Borough Local Plan (1996-2011) cannot be changed, it will be reviewed at the earliest opportunity through the Local Development Framework process and any review will be based on the findings of the Housing Market Assessment. All consultees will be included in any future reviews of the Policy.

The sliding scale is based on access to facilities, services and public transport, as recommended by the Local Plan Inquiry Inspector and as set out within Policy C3. It is intended as a starting point for negotiations on all sites where there is a net gain of 2 dwellings or more. Defining a sliding scale based on accessibility issues ensures that the policy will be implemented consistently through the Development Control process and provides certainty about what is expected to be provided in each location. However in light of the comments received and to avoid being too prescriptive, the Draft SPD has now been altered so that the sliding scale is expressed as a range of percentages. Further justification on why the settlements within each bullet point in the sliding scale have been chosen, has also now been included within the SPD in the interests of transparency.

The restriction on gross floor area for small dwellings forms part of the supporting text for the Housing Mix Policy in the Basingstoke and Deane Borough Local Plan (1996-2011). The Plan was adopted in July 2006 following extensive public consultation, a review by an Independent Inspector and approval by Council Members. The Housing Mix and Lifetime Mobility Standards SPD can not therefore alter Policy C3 or the supporting text but aims to provide additional information to support implementation.

Noted

Consultees	Comments Received	BDBC Response
Bell Cornwell	<p>Welcome the publication of guidance to expand on the requirements of Policy C3 and provide clarification for applicants.</p> <p>Whilst recognise there is a need for the policy to be applied to a wide range of developments, do not believe it is always appropriate for it to be applied to any development of two or more units, particularly where the net increase in dwellings is less.</p> <p>It is not always appropriate in design terms for a development to provide a mix of dwelling sizes. This may impact on the character and appearance of the area or prevent the most efficient use of land.</p> <p>The imposition of this policy on very small developments may result in them not coming forward due to financial viability.</p> <p>Request that consideration be given to imposing a threshold above which this policy will apply. As a minimum, it should only apply to any development resulting in a net increase of two or more dwellings. It may however be better to set higher thresholds in order to allow smaller schemes to be considered more flexibly and enable a mix of units appropriate to the specific site.</p> <p>Paragraph 6.7 of the SPD advises that it will normally be expected that the remainder of new dwellings will have 3 or more bedrooms. However this does not allow for developments of wholly small units.</p> <p>Other criteria for assessing an appropriate housing mix should be considered such as character of the area, immediate street scene and site characteristics such as capacity and relationship to neighbouring properties.</p> <p>Welcome the clarification in paragraph 8.2 that the maximum floor area should be calculated on the basis of gross internal floor area, as this is not made clear in the supporting text to Policy C3.</p>	<p>Noted</p> <p>The sliding scale is based on access to facilities, services and public transport, as recommended by the Local Plan Inquiry Inspector and as set out within Policy C3. It is intended as a starting point for negotiations on all sites where there is a net gain of 2 dwellings or more. Defining a sliding scale based on accessibility issues ensures that the policy will be implemented consistently through the Development Control process and provides certainty about what is expected to be provided in each location. However in light of the comments received and to avoid being too prescriptive, the Draft SPD has now been altered so that the sliding scale is expressed as a range of percentages. Further justification on why the settlements within each bullet point in the sliding scale have been chosen, has also now been included within the SPD in the interests of transparency.</p> <p>Clarification has now been added to the SPD to show that the Policy applies to net gain. An appropriate mix of dwellings is important whatever the size of site or setting. Setting a higher threshold could lead to a poor mix in some of the smaller sites in rural areas, where they may be less opportunities coming forward to establish an appropriate mix of housing to meet local needs.</p> <p>The SPD aims to support Policy C3 in order to meet the Policy aim of creating balanced and sustainable communities. However paragraph 7.2 of the Draft SPD does recognise that there may be exceptions where a higher or lower proportion would be appropriate as a result of detailed design considerations, the physical characteristics of the site, the character of the area or local housing need and existing provision. It is therefore accepted that individual assessments will need to be made, based on local circumstances and context in line with other policies in the Local Plan. However the starting point will always be for a range of units and sufficient evidence will need to be provided if this is not to be followed on an individual site.</p> <p>Noted</p>
Development Control, Basingstoke and Deane Borough Council	<p>Paragraph 5.3: By the time the SPD is adopted PPS3 will be most relevant and therefore could argue that no reference should be made to PPG3.</p> <p>Paragraph 5.6: Bearing in mind the emphasis in PPS3 on family housing is the policy compatible with the PPS approach.</p> <p>Paragraph 7.1: Needs to be clearly stated that the DC approach is for the policy to be applied to all sites where there is a net gain of 2 or more units.</p> <p>Paragraph 8.1: It should be made clear that the floor space requirement only applies to the market dwellings and not affordable units.</p>	<p>Agreed- The references to PPG3 have been removed and the Draft SPD has been updated accordingly.</p> <p>The Policy states that between 30-50% of market dwellings provided on a site will be small units. As outlined in paragraph 6.7 of the Draft SPD, this therefore means that the remainder of all new dwellings will normally be expected to have 3 or more bedrooms, thereby providing accommodation to meet the needs of families and multi-person households. This will ensure the provision of a mix which will contribute to the creation of sustainable communities. PPS3 is consistent with the Policy aim of creating mixed and balanced communities.</p> <p>Agreed-Clarification has now been added to the SPD to show that the Policy applies to net gain.</p> <p>Noted- This has now been clarified within the document.</p>

Consultees	Comments Received	BDBC Response
Barton Willmore on behalf of St James Developments	<p>Paragraph 9: Consider that there should be some acknowledgement that achieving 15% of all units to Lifetime Homes Standards may not be achievable where units are created through refurbishment rather than new build. The ability to make the necessary adaptations will be constrained by the existing built form. Where refurbishment forms part of a mixed scheme with new build, consider that it would be unreasonable for the 15% target to be achieved across the whole scheme with the requirement falling disproportionately on the new build units. Therefore request that an exception is made for housing which is either 100% refurbishment or is part refurbishment/new build.</p>	<p>The objective of achieving 15% of new homes designed to Lifetime Mobility Standards is a target for the whole of the Borough. It is therefore accepted that some sites may provide higher than 15%, whilst there be other individual site circumstances where the 15% cannot be achieved.</p>
Chris Hall- Basingstoke and Deane Borough Council Access Group/Disability Forum	<p>I can not see anything wrong with the Housing Mix and Lifetime Mobility Standards SPD. However if the Council is not to compromise the access of its disabled people it should consider that there is a huge shortfall in wheelchair accessible housing association properties for the under 55's within the curtilage of the town centre. Mobility vehicles are increasingly being used by those medically unable to drive a standard road vehicle. Such owners will require storage for mobility scooters which is lockable and acceptable to the insurers.</p>	<p>This predominately relates to housing association properties and therefore falls outside the scope of this SPD. The Council will however liaise with the Housing Association on this issue. It is also recognised that the Housing Market Assessment may identify the shortfall in wheelchair accessible properties.</p> <p>Storage for mobility scooters will be explored through the Design Statements of individual planning applications.</p>
Brookvale Community Association-Development Sub-Committee	<p>General comments: The concentration on small units is now a policy that has run its course. Basingstoke is at risk of being saturated with flats. This policy should be changed with the percentages reduced. Although there is an increasing proportion of people living alone (widowed, divorced, never married) most people aspire to at least a spare room and many aspire to marriage/partnering regarding their single state as temporary. Therefore it is wrong to build too many one bedroom properties.</p> <p>Paragraph 5.4: If this policy results in homes being made 'affordable' by being made cheaply-high density, tower blocks-it is a mistake. The way to make housing accessible is to subsidise the person in need of help, not cheapen the housing.</p> <p>Paragraph 7.2: 50% is too high a figure for one and two bedroom properties, even those adjoining the town centre. One bedroom properties meet the aspirations of very few people unless in their purpose built complexes such as retirement homes and sheltered housing schemes. Even people living by themselves need an extra room.</p> <p>Paragraph 8.1: If developers realise that the 'built pokey' is not what the market wants, why does the Council policy seek to reinforce it. This policy needs changing.</p>	<p>Policy C3 and the supporting text form part of the Basingstoke and Deane Local Plan (1996-2011) which was adopted in July 2006, following extensive public consultation, a review by an Independent Inspector and approval by Council members. The Housing Mix and Lifetime Mobility Standards SPD can not therefore alter Policy C3 or the supporting text but aims to provide additional information to support implementation. Whilst the Policy states that between 30-50% of market dwellings provided on a site will be small units, paragraph 6.7 of the Draft SPD does recognise that between 50-70% of new dwellings will therefore be expected to have 3 or more bedrooms and thereby provide accommodation to meet the needs of families and multi person households.</p> <p>Paragraph 7.2 of the Draft SPD does recognise that the phrase '2 bedrooms or fewer' is simply an explanation of the term 'small units'. Either a 1 or 2 bedroom unit therefore counts as a small unit and the policy should not therefore be interpreted to imply that on each and every site 'small units' should always include 1 bedroom units. The evidence base does indicate that there will continue to be a requirement for units with 2 bedrooms or less, in order to fulfil the aim of providing a mix of dwellings which will contribute to the creation of sustainable communities. The Council does however recognise that there is a limited need and market for 1 bedroom dwellings and that they will only meet the needs and aspirations of a small proportion of households.</p>