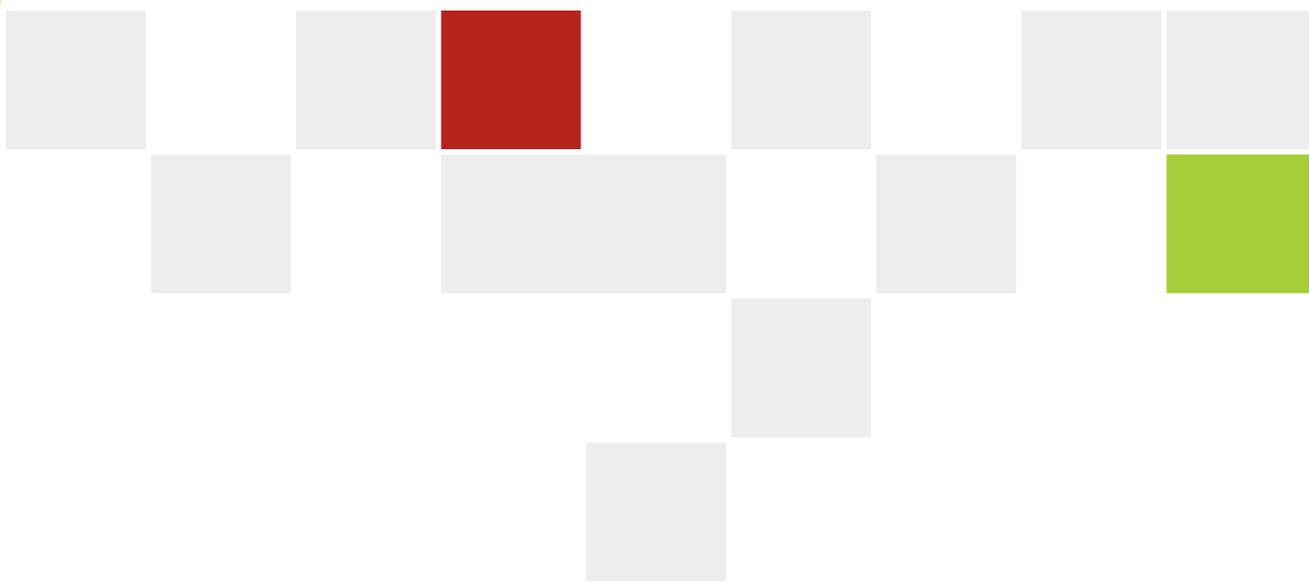


Basingstoke Golf Course

Response to Issue 5: Greenfield Site Allocations
of the Basingstoke and Deane
Local Plan 2011 - 2029



Boyer

Report Control

Project:	Basingstoke Golf Course
Client:	Basingstoke Golf Club
Reference:	12.125
File Origin:	\\martin\Boyer Planning\Project Folders\12.125 Basingstoke Golf Club\Local Plan EXAMINATION\STATEMENT\150911 Final BGC - BDBC Local Plan Representations.docx
Primary Author	James Wells
Checked By:	

<i>Issue</i>	<i>Date</i>	<i>Status</i>	<i>Checked By</i>
1	08/09/2015	Draft v2	MN
2	09/09/2015	Draft v3	MN
3	10/09/2015	Draft v4	MN
4	10/09/2015	Draftv5	MN
5	11/09/2015	Final	MN

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APPENDIX

Appendix One – Initial, formal response to the mid-examination consultation on the proposed modifications to the Submission Local Plan dated 11 May 2015, letter dated 22 June 2015

1. INTRODUCTION

- 1.1 This statement has been prepared by Boyer on behalf of Basingstoke Golf Club in response to the mid-examination consultation on the proposed modifications to the Submission Local Plan dated 11 May 2015.
- 1.2 This statement should be read alongside our initial, formal response to the mid-examination consultation on the proposed modifications to the Submission Local Plan dated 11 May 2015, as set out in our letter dated 22 June 2015. Our letter dated 22 June 2015 is set out in **Appendix 1**.
- 1.3 This statement should also be read alongside the Statement of Common Ground between Basingstoke Golf Club (Boyer) and Basingstoke and Deane Borough Council, dated August 2015 Reference BDBC 0/15. The Statement of Common Ground identifies key areas of agreement and disagreement between Basingstoke Golf Club and Basingstoke and Deane Borough Council in advance of the proposed modifications to the Submission Local Plan being considered at Examination in Public.
- 1.4 Focussing on Key Issue 5: Greenfield Site Allocations, inter alia, this statement seeks to provide positive answers, with regard to Policy SS3.11 - Basingstoke Golf Course, to the following questions:
 - Are the proposed major new developments for new housing and other uses positively prepared, justified and deliverable; and
 - Does the level of detail in the policies and Inset Diagrams meet the requirements in the Planning Policy Guidance for Local Plans to make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered.
- 1.5 Basingstoke Golf Club consider that the proposed allocation at Basingstoke Golf Course for a high quality, mixed-use development including approximately 1,000 dwellings is sound, and represents a positively prepared, justified and deliverable (i.e. effective) site that will assist in providing much needed housing and supporting infrastructure that is consistent with national policy and will enable the delivery of sustainable development.
- 1.6 Each of our comments relates to a particular proposed modification, paragraph or policy in the Submission Local Plan. This statement is structured accordingly. This statement is therefore structured as follows:
 - Section 2 provides a brief reference to relevant national planning policy;
 - Section 3 sets out our comments on relevant proposed modifications, paragraphs or policies in the Submission Local Plan; and
 - Section 4 provides a brief summary and conclusions.

2. NATIONAL POLICY CONTEXT

- 2.1 National Planning Policy is already before the Examination. Therefore, relevant planning policy is referred to in briefly in the following sections of this statement.

3. HOUSING REQUIREMENT AND SUPPLY

Introduction

3.1 The proposed modifications to the Submission Local Plan include:

- Increasing the local housing figure from 748 to 850 dwellings per annum; and
- The inclusion of a new greenfield allocation of approximately 750 dwellings at Hounsome Fields in south-west Basingstoke.

Amount of Housing

3.2 This statement refers to the proposed modifications as set out within the schedule shown on pages 8-13 of the mid-examination consultation document dated 11 May 2015.

PM1, PM2, PM5, PM7 and PM8 – Housing Numbers & Delivery

3.3 One of the key objectives of the National Planning Policy Framework (March 2012), as set out in paragraph 47, is to “**boost significantly the supply of housing.**” Therefore, the overall increase in housing numbers from 748 to 850 dwellings per annum is supported.

PM9 – Hounsome Fields

3.4 The allocation of approximately 750 homes at Hounsome Fields is fully supported in order to deliver the additional housing identified within the Development Plan. The site is located immediately opposite Basingstoke Golf Club and provides important opportunities for shared infrastructure as well as other community benefits.

PM10 – Alteration to wording to insert ‘mixed use’

3.5 The insertion of the ‘mixed use’ wording is supported in order to improve clarity and consistency within the Development Plan.

PM11 – Removal of a two form entry primary school

3.6 The removal of the requirement to provide a two form entry primary school on site is welcomed.

PM12 - Consideration of Hounsome Fields in relation to vehicular accesses

3.7 The insertion of additional wording to ‘take-account’ of Hounsome Fields is welcomed in relation to vehicular accesses.

PM13 – Providing Safe & Convenient Crossing Points to facilities provided on Hounsome Fields

3.8 The provision of safe and convenient crossing points for cycle and pedestrian routes across the A30-Winchester-Road between the Basingstoke Golf Club site and Hounsome Fields is fully supported (although this is subject to our response detailed under the heading PM14 below).

PM14 – Providing joint master planning with Hounsome Fields & Kennel Farm

- 3.9 Whilst we note the Council's reasoning and justification behind this modification we want to limit the amount of joint work required between the sites. We are keen to ensure that all joint-work is kept to a minimum and that any work undertaken is 'fit for purpose' taking into account the physical severance provided by the A30-Winchester-Road. This approach accords with paragraph 154 of the NPPF.
- 3.10 We propose the master planning work is therefore restricted to three key areas including vehicular access to each site from the A30-Winchester-Road; cycle and pedestrian connectivity across the A30-Winchester-Road as well as the provision of shared / key-infrastructure e.g. provision of the school.
- 3.11 The above master planning work should not, however, pre-determine or prejudice, the future layout and design of the Basingstoke Golf Club site as this will be ultimately determined by the future owner and the Council's own Development Management team at the application stage.
- 3.12 Owing to the presence of the A30-Winchester-Road, we consider Basingstoke Golf Club and Hounsome Fields should be planned in terms of vehicular access, non-vehicular connectivity and the provision of shared key-infrastructure only.

PM15 Hounsome Fields

- 3.13 We support the allocation of Hounsome Fields but this support is subject to overcoming our concerns highlighted in the section above under the heading 'PM14'.

PM17 Gypsies & Travellers

- 3.14 We wish to maintain our objection to the incorporation of traveller pitches within the Basingstoke Golf Club site. We consider there are more appropriate 'Council-owned' sites elsewhere within the district.

Level of Detail in Policy SS3.11 and the Inset Diagrams and Delivery

- 3.15 Paragraph 157 of the NPPF encourages local planning authorities to plan positively for the development and infrastructure required in an area, including allocating sites to promote development and providing detail in relation to form, scale, access and quantum of development.
- 3.16 The four tests of soundness against which a Local Plan will be assessed when it is examined by an independent inspector are set out in Paragraph 182 of the NPPF. In order to be considered sound, a Local plan should be:
- Positively prepared;
 - Justified;
 - Effective (i.e. deliverable); and
 - Consistent with national policy.

3.17 Planning Policy Guidance (PPG) section 15 Local Plans provides further advice on what local plans should contain. Paragraph 2 states that the local plan should make clear what is intended to happen over the life of the plan, where and when this will occur and how it will be delivered. Paragraph 2 refers to this being done by “setting out broad locations and specific allocations of land for different purposes;” Paragraph 2 also refers to local plans including a policies map illustrating geographically the application of policies in a development plan. The policies map may be supported by such other information as the local planning authority sees fit to best explain the spatial application of development plan policies.

3.18 The NPPF and PPG do not require the preparation of indicative land use layout plans for each allocation.

The Text of Policy SS3.11

3.19 With regard to **Gypsies and Travellers** (criterion b)), Basingstoke Golf Club considers gypsy and traveller sites / pitches should not be provided as part of the development proposals as it will reduce the site’s overall development capacity and make the site less viable. Instead, Basingstoke Golf Club considers gypsy and traveller sites should be concentrated on larger sites within the borough, particularly on land that is either owned or controlled by the local planning authority.

3.20 Regarding **on-site infrastructure and comprehensive development** (criteria c) and o)), Section 6 of the Statement of Common Ground between Basingstoke Golf Club (Boyer) and Basingstoke and Deane Borough Council, dated August 2015 Reference BDBC 0/15 , confirms it is common ground between the local planning authority and Basingstoke Golf Club that;

- Infrastructure in south-west Basingstoke should be comprehensively planned; and
- Criteria c) and o) of Policy SS3.11 should be amended to provide more detail about the infrastructure required and to include reference to the requirement for an infrastructure development plan.

3.21 With regard to **landscape character, urban design and ecology** (criteria d) and e)), Section 6 of the Statement of Common Ground between Basingstoke Golf Club (Boyer) and Basingstoke and Deane Borough Council, confirm it is common ground between the local planning authority and Basingstoke Golf Club that criteria d) and e) provide an acceptable framework to protect the natural environment.

- 3.22 Regarding **highways**, Hampshire County Council, in its role as local highway authority (LHA), has considered initial transport and highways matters relating to the proposed allocation of Basingstoke Golf Course (ref: Policy SS3.11) and Hounsome Fields (ref: Policy SS3.12) in the proposed modifications to the Submission Local Plan. This has included a review of high level data and associated commentary within an 'Agreed Transport Statement', which is an agreed statement between the promoters of the Basingstoke Golf Course and Hounsome Fields sites and is before the Examination as Appendix 7 of the Statement of Common Ground between Basingstoke Golf Club (Boyer) and Basingstoke and Deane Borough Council.
- 3.23 In terms of the principal vehicular access to the sites, both sites include very long frontages with the A30 and therefore there are numerous options to achieve safe and suitable vehicular access. The LHA has considered the opportunity to provide access via both a signalised junction option and a roundabout. The concept access options are noted as being viable propositions for the quantum of development set out in the Local Plan.
- 3.24 The final type of junction will be refined as detailed studies are undertaken to support future planning applications.
- 3.25 Section 6 of the Statement of Common Ground between Basingstoke Golf Club (Boyer) and Basingstoke and Deane Borough Council confirms it is common ground between Basingstoke Golf Club, the local highway authority and the local planning authority that:
- The concept of at-grade pedestrian/cyclist crossing facilities within the new junctions on the A30 is supported;
 - It is agreed that an appropriate land envelope can and will be safeguarded on the A30 to allow the site access junction to accommodate possible future development to the north as required by Policy SS3.12;
 - The wider traffic impact of the proposed local plan allocations is set out in the strategic level Transport Assessment produced by Parsons Brinckerhoff which is agreed by Hampshire County Council with the exception of a specific concern explained within its representations on Policy SS3.10;
 - Hampshire County Council is satisfied that the development on land covered by Policy SS3.11 and SS3.12 has potential to be acceptable in transport sustainability terms. As matters progress, the LHA will expect to see the detail of how the sites will build upon existing walking, cycling and public transport provision to provide connectivity to local facilities and services and those further afield. Access strategies will need to allow for (and capitalise upon) improvements that may or may not be brought forward by others. At this stage, the LHA consider that the sites have potential to provide opportunities for sustainable travel in a reasonable and realistic way.
- 3.26 With regard to **sewerage, drainage and flooding** (criteria j) and k)), Section 6 of the Statement of Common Ground between Basingstoke Golf Club (Boyer) and Basingstoke and Deane Borough Council confirms it is common ground between Basingstoke Golf Club and the local planning authority that:

- Sewerage capacity is not a constraint; and
- Flood risk will need to be attenuated in accordance with the requirements of local and national policy, but that flooding will not be a significant constraint to development on the site.

3.27 Regarding **noise** (criterion m)), Section 6 of the Statement of Common Ground between Basingstoke Golf Club (Boyer) and Basingstoke and Deane Borough Council confirms it is common ground between Basingstoke Golf Club and the local planning authority that:

3.28 Acceptable noise and air quality standards will be met within homes and amenity areas through suitable design, noise and air quality mitigation measures in light of the proximity of the site to the M3 and A30.

Inset Diagrams

3.29 Whilst recognising that further information will become available through the detailed design process, the draft Inset Map identifies the general location of the principal access and key infrastructure on the site. The key features shown for the area include:

- Single principal access to / from the A30 comprehensively planned between the Golf Course Site and Hounsome Fields;
- Centres (including community facilities) on both sites;
- A primary school on Hounsome Fields; and
- Pedestrian / cycling connections to the town centre via Beggarwood Lane

3.30 Section 5 of the Statement of Common Ground between Basingstoke Golf Club (Boyer) and Basingstoke and Deane Borough Council confirm that the draft Inset Map and the Constraints Map are common ground between the local planning authority, the local highway authority, the local education authority and Basingstoke Golf Club.

Delivery

3.31 Section 2 and 3 of the Statement of Common Ground between Basingstoke Golf Club (Boyer) and Basingstoke and Deane Borough Council confirm it is common ground between the local planning authority and Basingstoke Golf Club that:

- There is no planning policy requirement to retain the golf course;
- The Golf Course Site will be made available for development; and
- Approximately 1,000 dwellings will be delivered within the plan period.

3.32 Once the Golf Course Site has been allocated within the adopted local plan, it will be promptly marketed by Basingstoke Golf Club. Within the sales contract for the site, the selected purchaser will be contractually obliged to submit an early planning application and to deliver the housing as soon as reasonably possible.

3.33 There is likely to be significant demand from purchasers given that:

- The site is highly desirable in terms of its location and setting;

- It is easy to commence development at the site given the limited level of new infrastructure that is required to service the development;
- The site can be delivered in phases, reducing the risk for the developer; and
- The site is not reliant on any complex land assembly or access issues.

4. SUMMARY AND CONCLUSIONS

- 4.1 We consider that the proposed allocation at Basingstoke Golf Course (policy SS3.11) for a high quality, mixed-use development including approximately 1,000 dwellings is **sound**. It represents a **positively prepared** development which will help to meet objectively assessed development and infrastructure requirements and is consistent with achieving sustainable development. Along with Hounsome Fields (policy SS3.12) and other greenfield site allocations, the site will help to support the increased local housing figure and delivery.
- 4.2 The proposed allocation at Basingstoke Golf Course (policy SS3.11) is also considered to be **justified** and **deliverable (i.e. effective)**. It will assist in providing much needed housing and supporting infrastructure that is **consistent with national policy** and will enable the delivery of sustainable development.
- 4.3 Therefore, in response to the first Key Issue 5: Greenfield Site Allocations question, we consider the proposals for Basingstoke Golf Course as set out in policy SS3.11 to be positively prepared, justified and deliverable.
- 4.4 Planning Policy Guidance states that the local plan should make clear what is intended to happen over the life of the plan, where and when this will occur and how it will be delivered.
- 4.5 In accordance with Planning Policy Guidance, the proposed allocation at Basingstoke Golf Course (policy SS3.11) provides a **specific allocation of land** and is supported by detailed text setting out a range of criteria, the majority of which have been agreed as common ground between the local planning authority and Basingstoke Golf Club. Policy SS3.11 is also supported by a **draft Inset Map** and a **Constraints Map** that identify the general location of the principal site access and key infrastructure on the site and are also common ground between the local planning authority, the local highway authority, the local education authority and Basingstoke Golf Club.
- 4.6 It is also common ground between the local planning authority and Basingstoke Golf Club that the site is **deliverable**. There is no planning policy requirement to retain the golf course, the Golf Course Site will be made available for development and approximately 1,000 dwellings will be delivered within the plan period.
- 4.7 Therefore, in response to the second Key Issue 5: Greenfield Site Allocations question, the level of detail in policy SS3.11 and the draft Inset Map and Constraints Map is considered to meet the requirements in Planning Policy Guidance for Local Plans to make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered.

APPENDIX ONE

Initial, formal response to the mid-examination consultation on the proposed modifications to the Submission Local Plan dated 11 May 2015, letter dated 22 June 2015.

22 June 2015

Mr Matthew Melville
Planning Policy & Infrastructure
Basingstoke & Deane District Council
Civic Offices
London Road
Basingstoke
Hampshire
RG21 4AH

Dear Mr Melville,

REPRESENTATION IN RESPONSE TO THE MID-EXAMINATION CONSULTATION ON THE PROPOSED MODIFICATIONS TO THE SUBMISSION LOCAL PLAN WITH REGARD TO BASINGSTOKE GOLF CLUB, BASINGSTOKE

We write on behalf of Basingstoke Golf Club to provide our formal response to the mid-examination consultation on the proposed modifications to the submission Local Plan dated 11 May 2015.

We acknowledge the key proposed modifications to the submission Local Plan includes:

- Increasing the housing number from 748 to 850 dwellings per annum;
- The inclusion of a new green-field allocation of approximately 750 at Hounsome Fields in south-west Basingstoke; and
- Inclusion of an employment target.

This letter addresses the proposed modifications as set out within the schedule shown on pages 8-13 of the mid-examination consultation document:

- PM1, PM2, PM5, PM7, PM8 – Housing Numbers & Delivery

The overall increase in housing numbers is supported, particularly as this addresses the Planning Inspector's key concern relating to the soundness of the plan. It is noted that the Council have also updated its evidence base which also supports the increased housing numbers and delivery.



- PM9 – Hounsomes Fields

The allocation of approximately 750 homes at Hounsomes Fields is fully supported in order to deliver the additional housing identified within the Development Plan. The site is located immediately opposite Basingstoke Golf Club and provides important opportunities for shared infrastructure as well as other community benefits.

- PM10 – Alteration to wording to insert ‘mixed use’

The insertion of the ‘mixed use’ wording is supported in order to improve clarity and consistency within the Development Plan. Mixed use development is considered to bring about greater flexibility and will deliver a higher quality development overall at the site.

- PM11 – Removal of a two form entry primary school

The removal of the requirement to provide a two form entry primary school on site is welcomed. The removal of the primary school will enable the overall amount of housing to be increased on site. The provision of a community centre, local shopping facilities and sport facilities is supported provided there is a clear need and that this does not replicate provision within Hounsomes Fields or within the wider local area.

- PM12 - Consideration of Hounsomes Fields in relation to vehicular accesses

The insertion of additional wording to ‘take-account’ of Hounsomes Fields is welcomed in relation to vehicular accesses. Given the complexities of providing safe access onto the A30-Winchester-Road discussions between the landowners / developers at Hounsomes Fields and Hampshire County Highways are welcomed (although this is subject to our response detailed under the heading PM14 below).

- PM13 – Providing Safe & Convenient Crossing Points to facilities provided on Hounsomes Fields

The provision of safe and convenient crossing points for cycle and pedestrian routes across the A30-Winchester-Road between Basingstoke Golf Club site and Hounsomes Fields is fully supported (although this is subject to our response detailed under the heading PM14 below). In addition, upgrading the cycle link to Dummer as well as links to the existing Winchester Road bus stops is also supported.

- PM14 – Providing joint master planning with Hounsomes Fields & Kennel Farm

Whilst we note the Council’s reasoning and justification behind this modification we want to limit the amount of joint work required between the sites. We are keen to ensure that all joint-work is kept to a minimum and that any work undertaken is ‘fit for purpose’ taking into account the physical-severance provided by the A30-Winchester-Road. This accords with paragraph 154 of the NPPF

which states: *'Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.'*

We propose the master planning work is therefore restricted to three key areas including vehicular access to each site from the A30-Winchester-Road; cycle and pedestrian connectivity across the A30-Winchester-Road as well as the provision of shared/key-infrastructure e.g. provision of the school. This approach would be more 'effective' in clearly setting our policy expectations upon the two sites as the current reference to 'joint master planning' and 'comprehensive development' could be far reaching, beyond what is necessary and 'not justified' given the limited physical relationship between the sites and the existence of a major road between them. In this regard we would welcome the Council setting out the minimum requirements for the developers and land owners at Basingstoke Golf Club, Hounsome Fields and Kennel Farm within a separate brief. Once the minimum requirements are agreed / clearly defined we would welcome engagement with the developers / land owners at Hounsome Fields and Kennel Farm as well as Hampshire County Highways and other statutory-authorities.

Notwithstanding the above, we are concerned that there is limited time to complete the above work in readiness for the Pre Hearing meeting due on 21 July 2015 and the Local Plan inquiry (expected autumn 2015). In addition, we are keen that the above master planning work does not pre-determine or prejudice, the future layout and design of Basingstoke Golf Club site as this will be ultimately determined by the future owner and the Council's own Development Management team at the application stage. For the same reasons, we are concerned about the Planning Inspector's request for indicative layout plan 'inserts' for each housing allocation within the Development Plan. Whilst paragraph 157 of the NPPF encourages details in relation to form, scale, access and quantum of development it does not require the preparation of indicative land use layout plans for each allocation.

In summary therefore, owing to the presence of the A30-Winchester-Road, we consider Basingstoke Golf Club and Hounsome Fields should be planned in terms of vehicular access, non-vehicular connectivity and the provision of shared key-infrastructure only. In addition, owing to the physical-severance provided by the A30-Winchester-Road, we consider Basingstoke Golf Club can be designed largely independently from Hounsome Fields and Kennel Farm. In order for the policy to be 'effective' and 'justified' as required by the NPPF paragraph 182, it should clearly set out the scope and limits of any requirement to consider the sites together in terms of master planning, design and infrastructure provision.

- PM15 Hounsome Fields

We support the allocation of Hounsome Fields but this is subject to overcoming our concerns highlighted in the section above under the heading 'PM14'.

- PM17 Gypsies & Travellers

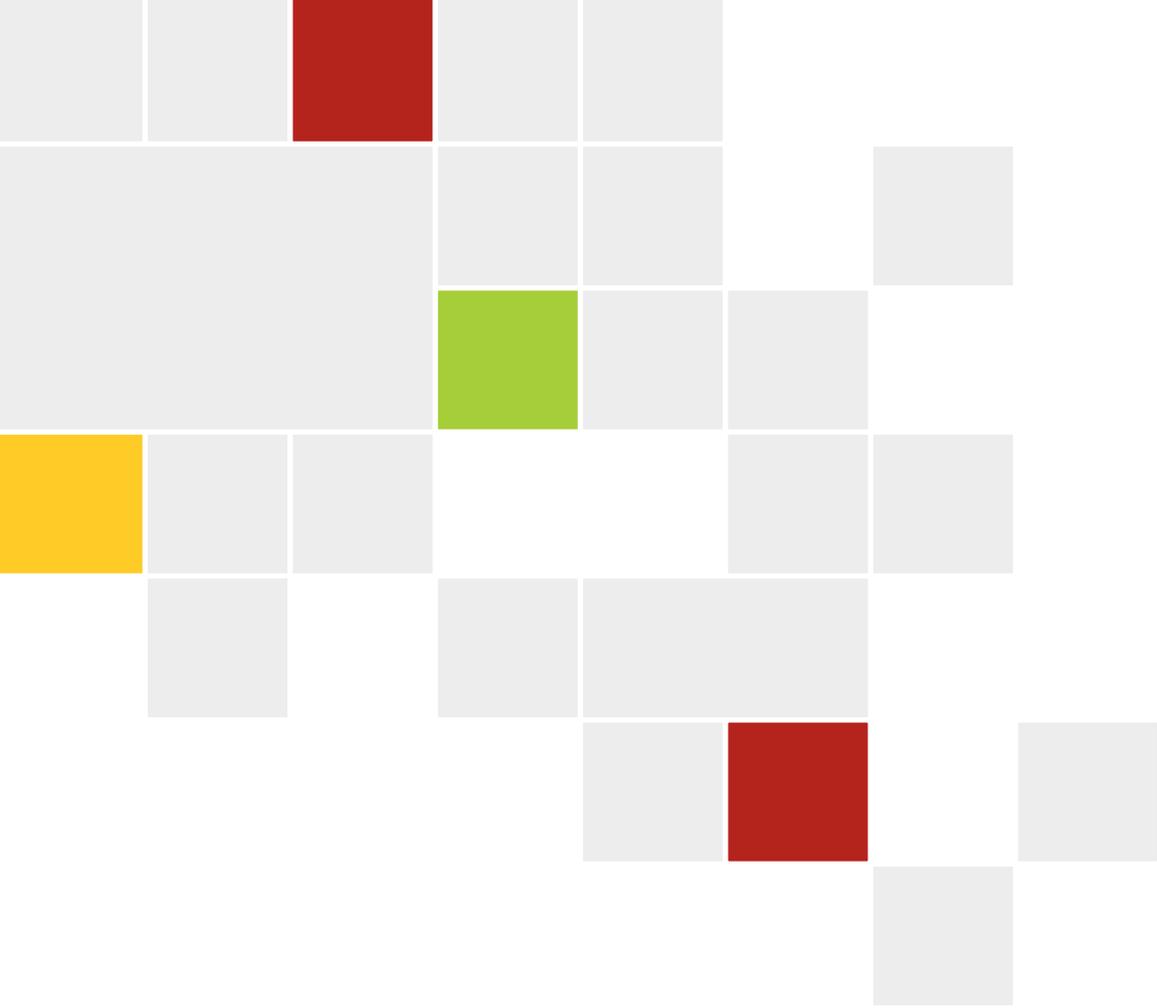
We wish to maintain our objection to the incorporation of traveller pitches within the Basingstoke Golf Club site. We consider there are more appropriate 'Council-owned' sites elsewhere within the district.

If you have any questions in relation to the above please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink that reads "A TWAMLEY". The letter "A" is large and stylized, followed by "TWAMLEY" in a more standard, slightly cursive hand.

Arron Twamley
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Boyer

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