

Statement for EiP Hearing on Issue 5

Policy SS3.10 – Manydown

1. The policy is unsound because Inset Map 2 allocates more land at the western edge adjacent to the B3400 than is necessary for the delivery of 3,400 dwellings in the plan period. It is contrary to the NPPF protection for the landscape and the best agricultural land and is inconsistent with the proposed policy EM2 on Strategic Gaps. Developing Manydown that far west along the B3400 would effectively destroy the identity of Oakley as a separate settlement.

History

Map 1a of the Pre-Submission Local Plan placed the western boundary of the Manydown development along the ridge that runs north south across the B3400.

The landowners (Biles, HCC, p31) commented on that map. They rightly objected to the designation of a large part of the land proposed for allocation as suitable only for limited development “due to heritage and landscape constraints”. They supplied a revised map (p32) which not only removed that designation but also moved the western edge of the development from the ridge to the road that joins the B3400 to Wootton St Lawrence. That road lies at the bottom of the slope from the ridge towards Oakley and open countryside.

The landowners’ representation gives no justification for moving the boundary to the west.

The schedule of representations does not offer any explanation: at the bottom of page 146 officers merely say that they are increasing the area within the site allocation as a “Factual update”.

Changes to the Pre-Submission Local Plan were made on the basis of a report to Cabinet on 18 March 2014:

<http://www.basingstoke.gov.uk/rte.aspx?id=1504&MeetingId=1964>

The table showing the reasons for the proposed changes did not include any explanation for the westward extension of the Manydown site. The covering report merely said that changes to the site boundary at Manydown had been made as a result of the consultation and additional information provided by site owners.

It cannot be justified to make such a major change – with such serious implications for the landscape and the local community – without adequate evidence.

Newfound

The area of Oakley along the B3400 is known as Newfound. It lies outside the Oakley SPB in order to limit development. It has been part of Oakley since 1968: see page 4 of the Oakley Village Design Statement which has been Supplementary Planning Guidance since 2004:

<http://www.basingstoke.gov.uk/rte.aspx?id=1633>

The highway authority’s 30mph speed limit recognises that Newfound is part of Oakley.

The ridge across the B3400 as a natural boundary

The north-south ridge across the B3400 has long been recognised as a natural boundary for the westward expansion of Basingstoke. The Oakley VDS says (on page 13) “The

ridgeline running south from Scropp's Hill to the railway forms a natural and locally significant barrier between Oakley and Basingstoke" It is a landscape feature that is "vital to the sense of Oakley being set within surrounding countryside".

The Planning Inspector in his report on the 2005 Local Plan Review said:

"Housing is proposed on the western slopes of this ridge. This land is beyond the existing visual setting of Basingstoke and housing on these western slopes would be prominent when approaching along the B3400 from Oakley, greatly reducing the perceived gap between Oakley and the beginning of the built-up area of Basingstoke. The character and integrity of the narrow belt of countryside between them would be undermined by development so prominent and extensive." (paragraph 1.16.43)

The Pre-Submission Local Plan used the ridge to determine the western edge of the Manydown development.

Landscape and agricultural land

The 2010 Landscape Capacity Study assigned a "Low" landscape capacity. Development on the western slope of the ridge would be contrary to the recommendation (p38) that any development should be restricted to the lower ground towards the centre, generally between Worting Road and Pack Lane, where development would be more sheltered from the wider countryside.

Development on the slope would be visible from the open countryside for a considerable distance – quite possibly from the North Wessex Downs AONB. It would fail to protect or enhance a valued landscape – NPPF109.

The January 2013 Site Assessment notes that the land at Manydown is predominantly of "good" agricultural quality with some "very good". There should be no development on the agricultural land west of the ridge as it has not been demonstrated to be necessary – NPPF112.

The Oakley Strategic Gap

The field on the western slope but north of the B3400 is highly visible to anyone travelling along the B3400 from Oakley to Basingstoke. It lies only 300 metres from the end of the built up area and the intervening section of road is 40 mph.

Houses built on that field would become visible long before anyone left Oakley, because of the way the B3400 bends right just where it enters the proposed allocation. The 40 mph would probably become 30 mph so there would be a continuous built up area from Oakley to Basingstoke.

That would be inconsistent with the Strategic Gaps policy EM2 which is intended to maintain a clear gap between settlements so that someone travelling through a strategic gap has a clear sense of having left the first settlement, having travelled through an undeveloped area and then entered the second settlement (Submission Local Plan, paragraph 6.13).

The proposed bypass

Proposed policy SS3.10 n) requires the master planning of Manydown to have regard to the potential requirement for a Basingstoke western by-pass that would link the A339 to Junction 7 of the M3 motorway *outside the land currently allocated for housing*.

If the Wootton St Lawrence road is retained as the western boundary of Manydown any such bypass would need to pass through the minimal remaining gap between Oakley and the Manydown development.

Land budget

The landowner representations during the consultation on the Pre-Submission Local Plan (Biles, HCC, page 5) included an indicative land use schedule for the emerging masterplan. That budget included 22 hectares for the oil pipeline wayleave and 21 hectares for green infrastructure. That is double-counting because the area around the pipeline could be used for green infrastructure.

This shows there is spare capacity in the land budget that would permit delivery of 3,400 dwellings, plus infrastructure, even if the western boundary is moved back.

The rate of delivery on Manydown

The information provided by the LPA and the landowners is confusing and appears to be internally inconsistent. The land allocated to Policy SS3.10 in Inset Plan 2 covers six SHLAA sites: BAS098 (the main land at Manydown, owned by HCC & BDBC) and five other sites – BAS099, BAS105, BAS106, BAS115 & BAS116. The draft Inset Plan in Appendix 1 of the SoCG for Manydown shows the same area of land. The yields for the six sites in the latest SHLAA total 3,470.

The SHLAA concludes that BAS098 on its own is capable of delivering approximately 320 units per annum when the site is well established but it then puts the yield for that site for the 5-10 year period at only 1,370 which is 274 pa.

The SoCG - agreed by the landowners of BAS098 alone - confirms the 320 per annum delivery rate (p6).

If 3,400 can be delivered on BAS098, the total yield from the land allocated under policy SS3.10 is 3,730. This shows the overall site could deliver 3,400 dwellings in the plan period even if the western boundary is moved back.

The long-term yield from the land allocated

The March 2014 Site Assessment studied various parcels of land at Manydown. The land north of the railway allocated in Inset Map 2 is the whole of parcels 1 to 5. The Site Assessment shows a total yield for those parcels of 4,880 (900 + 900 + 280 + 1500 + 1300). The landowners would be able to deliver 3,400 dwellings without using land west of the ridge.

Soundness and a plan-based approach

Inclusion of land west of the ridge would render the Local Plan “unsound” as it would not satisfy the requirement that it must be “justified”. There is no “proportionate evidence” that inclusion is “the most appropriate strategy” compared with the “reasonable alternative” – retaining the area in the Pre-Submission Local Plan.

Allocating spare capacity is inconsistent with a plan-based approach to development under which the location of development should be determined by the LPA through the Local Plan and not by giving landowners freedom to choose development sites within an unnecessarily large allocation.

Once land is allocated the principle of development is established even though this Local Plan should not make assumptions about the level of development that might be required in any subsequent period.

Proposed change

The land allocated under policy SS3.10 should revert to the area shown in Map 1a of the Pre-Submission Local Plan as there is no evidence that the larger area is necessary to deliver 3,400 dwellings in the plan period.

If the landowners could produce evidence to show that additional land is required, the ridge across the B3400 should still be the boundary adjacent to that road as the landowners have the option of bringing forward more land north of the railway but away from the B3400, while still leaving a meaningful gap between the development and Oakley.

- 2. The policy is also unsound because development of the land between the railway and Pack Lane allocated in Inset Map 2 may be unsustainable and would have a severe impact on road safety at the Fiveways road junction.**

Sustainability

The draft Inset Map (Manydown SoCG Appendix1) confirms there will be no direct links across the railway between the two parts of the development.

The area south of the railway has no genuine connection with any existing development. Indeed, the landowners' representations on the Pre-Submission Local Plan (Biles, HCC, p31) said the landowners considered the allocated land south of the railway to be peripheral and segregated, and recommended its removal.

Road safety

The only route between Parcel 6 and the centre of Basingstoke and most other destinations lies through the Fiveways Junction.

The HCC Highways response to the Pre-Submission Local Plan (p11) considered that it had not been demonstrated that an improvement at the Fiveways junction was realistically deliverable and that, without an improvement to the junction or an alternative access arrangement, the development of this site would cause undue interference with the safety and operation of the highway network.

The Pre-Submission Local Plan assumed a yield of 600 dwellings on the land south of the railway. The Submission Local Plan has an additional policy - SS3.10 u) - which limits development to approximately 300 units "unless workable transport mitigation measures can be demonstrated to support a higher yield". It seems from page 14 of the SoCG that the LHA are maintaining their objection despite the reduction in yield.

The September 2013 Transport Assessment (paragraph 4.18.8) proposed a mitigation scheme that required land to be acquired from adjoining private landowners but still left the junction overcapacity.

The February 2015 TA proposes a more modest mitigation which would still leave one arm not fully mitigated (p15). The main difference between the 2013 and 2015 TAs seems to have been a reduction in trip generation rates. This is flagged as an issue in the Position Statement on the Transport Assessment.

If the landowners bring forward updated proposals (SoCG, paragraph 7.25) the evidence should be fully tested at the examination.

Proposed change

Remove land south of the railway from the allocation for Policy SS3.10.

Failing that, amend Policy SS3.10 u) to make it clear that there should be no development unless there are workable transport mitigation measures.

3. Policy SS3.10 m) is unsound because it does not provide a clear indication of how a decision maker should react to a development proposal.

It is not enough to say that the road will go “through the land allocated for housing, from the A339 to the B3400”. The nature and purpose of the road needs further definition or clarification in the Policy.

An efficient link road is likely to be 40mph with little frontage access and few junctions. A lower speed road providing better pedestrian permeability would be less efficient at distributing traffic from the B3400 to the A339.

Clarity is needed so that the Transport Assessment can properly assess the implications of the traffic flows that are expected in practice and so that the IDP can correctly identify the mitigation that is required on the rest of the highway network.

Proposed change

The Policy should make it clear whether the road is intended to divert through traffic from the B3400 to the A339 or whether it is intended merely to service the new development.

If the link road is intended to divert traffic, the Policy should include a timescale for its completion as the need would arise well before the end of the Plan Period.

4. Policy SS3.10 l) may may not be "deliverable" as the available evidence is insufficient to show whether it is possible to mitigate the impact of development so that "the residual cumulative impacts of development" are not "severe" (NPPF32)

There were major changes between the September 2013 Transport Assessment and the May 2014 TA. The reasons do not seem to have been explained or justified but they may well result from the reduction in trip generation rates mentioned above.

Such major changes to the figures in such a short space of time cast doubt on the figures in the 2014 and 2015 TAs. The justification for the changes needs to be investigated at the EiP in order to test whether policy SS3.10 l) is “deliverable”.

Proposed change

Test whether the policy is deliverable and that residual cumulative impacts of development are not “severe”.

Policy SS3.11 – Basingstoke Golf Course

Policy SS3.12 – Hounsome Fields

Why the Local Plan is unsound

The allocation of Basingstoke Golf Course and Hounsome Fields is not part of "the most appropriate strategy when considered against the reasonable alternatives" (NPPF182). The March 2014 Site Assessment shows that BAS102 Lodge Farm (1,350 units) would be preferable. As the land at East of Basingstoke (BAS121) is publicly-owned and purchased for development purposes, allocation of the full 900 dwelling capacity for that site would also be preferable.

Objections in detail

Location of employment

The Golf Course and Hounsome Fields are the Basingstoke sites furthest from main centres of employment: seven miles by road from the town centre where most employment is located.

Basing View (Policy SS8) - which lies east of the centre - should be one of the borough's primary focuses for employment.

Policy EP2 identifies 12 Strategic Employment Areas. Only three of the smaller areas - Brighton Hill Industrial Estate, Moniton Trading Estate and West Ham Industrial Estate - lie west of the centre. All the large SEAs - Chineham Business Park, Daneshill East, Daneshill West and Hampshire International Business Park - lie to the east.

Developments should be "located where the need to travel will be minimised" (NPPF34).

The need for expensive transport infrastructure

The transport infrastructure required for the Golf Course and Hounsome Fields is substantially more expensive than that required for BAS102.

The February 2015 Transport Assessment identifies improvements required to the A30 (Wallop Drive, Kempshott and Brighton Hill) with a total indicative cost of £18m.

The September 2013 TA concluded that scenario 4 ("eastern focus" which included BAS102) would not require any further improvements to the A33 beyond those required for the sites already included in the Local Plan. Accordingly, allocating BAS102 would have a highway network cost of £0m compared with £18m for the Golf Course and Hounsome Fields.

Cost of sewage disposal

The SoCGs for these sites confirm that sewage would be treated at the Basingstoke Sewage Treatment Works at Chineham - next to BAS102. The Golf Course and Hounsome Fields are the Basingstoke sites furthest from the STW.

Thames Water say that the existing sewers through Basingstoke would be unable to cope with the necessary additional effluent. The Site Assessment (p151) concludes that "Major infrastructure is needed to convey the sewage effluent to the STW because of insufficient capacity in the network".

That infrastructure has not been costed. Given the distance involved it is unclear whether this infrastructure could be provided at a cost that would make the sites viable.

Even if it could, the ongoing environmental and economic costs of pumping sewage over that distance ought to be avoided if possible.

Agricultural land

The Golf Course is considered to be 69% grade 2 agricultural land and 31% grade 1 (Site Assessment, p144). Hounsme Fields is 81% grade 3a (p160). BAS102 is 55% grade 3b (p39).

Landscape

Hounsme Fields has a 'low' rating in the 2010 Landscape Capacity Study (p115). The Site Assessment (p158) notes that development of this site would have a "strongly negative" impact on the local landscape and that the area would not be able to accommodate new development without a significant impact on the landscape character.

The inspector at the 2005 Local Plan Review said "Development of this site would represent a substantial and harmful extension of the town into the countryside" (paragraph 8.8.37).

Other issues

Lodge Farm could be provided with a combined heat and power scheme using waste heat from the nearby incinerator.

It is not clear that the Golf Course site is available.

Site Assessment of BAS 102 Lodge Farm

There are no substantial planning objections to the allocation of BAS102.

Volume 3 of the 2014 Site Assessment looked at the combination of Lodge Farm and East of Basingstoke (pages 573 to 586). There were no "strongly negative" impacts. There was a concern that linking the two sites would increase the load onto a single highway access but the SoCG for East of Basingstoke confirms (Appendix 1) that there could be two access points – one through SS3.7 and one through SS3.9.

Proposed change to Local Plan

Remove the Golf Course and/or Hounsme Fields and replace it/them with BAS102 (Lodge Farm) and, possibly, the additional 450 dwellings on BAS121 (East of Basingstoke).