

BASINGSTOKE & DENE LOCAL PLAN EXAMINATION

HEARING STATEMENT

COOPER ESTATES STRATEGIC LAND

ISSUE 5 – GREENFIELD ALLOCATIONS

QUESTION 11

HEARING SESSION THURSDAY 15 OCTOBER 2015 (9.30AM)

1.0 Introduction

- 1.1 This statement has been prepared on behalf of Cooper Estates Strategic Land (CESL) in response to 'Key Issue' No. 5, (question 11) 'Greenfield Allocations'.

ISSUE 5: Greenfield Site Allocations

11. Greenfield Site Allocations: Are the proposed major new developments for new housing and other uses positively prepared, justified and deliverable? Does the level of detail in the policies and Inset Diagrams meet the requirements in the PPG 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? (PPG Ref ID 12-002-20140306.)

Positively prepared & justified

- 11.1 As set out in our hearing statement in response to Issue 4, the Council has undertaken a significant volume of evidence gathering and public consultation in the development of the local plan. The proposal to allocate major new Greenfield land allocations has resulted from this assessment process.
- 11.2 Having initially considered the sustainability of the Boroughs key towns and villages Council Officers sought the views of Councillors, local groups and local people through a range of public consultation exercises. (CD10).
- 11.3 Taking account of the feedback from this stakeholder consultation and the background technical assessment work, three main spatial options for growth in the borough were developed. These three options were then subjected to a comprehensive Sustainability Appraisal (SA) (SA02 and addendum SA01). This work concluded that focussing the majority of new housing development in and around Basingstoke whilst directing some growth to the larger, more sustainable rural towns and villages would deliver a number of obvious benefits and result in the least disadvantages (SA02 para 8.33). The Council summarises the assessment process helpfully in Housing Topic Paper TP01 and specifically the SA stages at paragraphs 5.11 to 5.18 of TP01.
- 11.4 The Council then undertook assessments of all available land including Greenfield sites and each individual site was subject to SA. The Infrastructure Delivery Plan was then prepared to consider the implications of bringing forward the favoured sites and the mitigation required in terms of new and enhanced local infrastructure provision.
- 11.5 It is considered that the engagement with local people and groups, the detailed technical assessment and sustainability assessment undertaken both in terms of the overall spatial strategy then individual sites demonstrates that the proposed allocations have been positively prepared and are justified in the context of a comprehensively prepared evidence base.

Deliverable

- 11.6 There are generally three broad issues to consider in terms of deliverability. These are firstly, the technical issues i.e. whether the site is capable of development in terms of access, ecology, landscape, infrastructure, ground conditions etc. The second aspect is financial viability i.e. whether when taking account of any site constraints, infrastructure mitigation or other planning policy requirements the land can be brought forward profitably. The third aspect is the ability and will of the landowner and / or developer to bring the site forward within a reasonable timeframe
- 11.7 In terms of the first element, the Council assessed the individual site allocations through the preparation of a number of technical documents as described in the Overview and Context Topic Paper (TP02 paras 5.13 to 5.20). The assessment tools included the Strategic Housing Land Availability Assessment (SHLAA) (HO01), the Housing Site Assessment (HO05), the SA (SA02 and SA01), the Biodiversity Assessment (ENV01), the Flood Risk ranking assessment (ENV04), the Landscape Capacity Study (ENV08), and the Sustainability of Settlements paper (HO07).
- 11.8 This assessment work has resulted in a sieving exercise so that sites with clear technical problems which are unlikely to be overcome and so threaten delivery, have been identified and not progressed as proposed allocations.
- 11.9 In terms of the second element, the Council commissioned a financial viability assessment from respected consultancy 'The Three Dragons' (TTD) (HO10) which has been used to inform its policy in respect of affordable housing and also to consider the relationship between the level of affordable housing being sought, the potential CIL charging levels and so the viability of the sites proposed for allocation in the plan.
- 11.10 TTD analysis identified two different market areas within the Borough. Although affordable housing policy CN1 includes a standard 40% affordable requirement regardless of the market area the supporting text recognises the need for flexibility and confirms that the 40% is a starting point for negotiation. Viability appraisals can be provided, considered and may lead to a lesser provision if 40% was likely to threaten delivery. The Borough's proposed CIL will be tested by way of separate examination during 2016 and the eventual charging levels will be informed by further viability assessment. However the draft schedule incorporates the finding of TTD report with a significantly lower level for Basingstoke compared to the higher value rest of the Borough to take account of the two market areas. These safeguards help to ensure that site delivery will not be threatened as a result of unrealistic financial burdens.

- 11.11 In terms of the final strand of the deliverability issue, the Council has engaged directly with the landowners and developers promoting the favoured sites to discuss issues of deliverability and timing. This has included meetings at the Council's Offices and at the sites as well as general correspondence and queries regarding delivery rates. These discussions have resulted in the estimated delivery timescales set out in Policy SS3.
- 11.12 In addition the Council and individual site owners / promoters have prepared statements of common ground (PS/02/37 – PS/02/42 and PS/02/48 – PS/02/50) which confirm the positive working relationships which exist and the desire to deliver the sites in accordance with the relevant policies in each case.

SS3.7 Redlands & SS3.9 East of Basingstoke

- 11.13 In terms of our clients site (SS3.7), there are policy requirements (and it is also simply good planning) to ensure that the land is developed comprehensively alongside the neighbouring site to the south (SS3.9) which is owned by Hampshire County Council.
- 11.14 Criterion (c) of the draft policy requires that the site layout provides for access between the SS3.7 and SS3.9 allocations and criterion (h), that joint master planning takes place.
- 11.15 In this respect CESL and its representatives are working closely with HCC and have attended joint meetings with HCC to ensure that the delivery of the sites is co-ordinated.
- 11.16 Indicative site layout work prepared on behalf of CESL demonstrates how the access from the A33 Gaiger Avenue roundabout can be provided and how the link road between SS3.7 and SS3.9 can be incorporated. This work has been shared with HCC to ensure compatibility and is now included in the statement of common ground. (PS/02/41).
- 11.17 CESL is also in the process of preparing a planning application for the SS3.7 site.
- 11.18 On 29 April 2015 under reference 15/00879/ENSC the Council confirmed that the proposal was not considered to be EIA development. CESL has subsequently entered into formal pre-application discussions with the Council's Development Management department to agree the scope of the application.
- 11.19 Consultants have been commissioned to undertake the necessary studies and assessments required to support a planning application.

- 11.20 This package of work includes a full Traffic Impact Assessment and detailed design of the proposed access link to the A33, tree survey and assessment, Phase 1 and Phase 2 ecology assessment, landscape and visual impact assessment, services / utilities assessment, odour assessment, noise assessment, heritage assessment and contamination assessment.
- 11.21 The results of the consultants work has confirmed the Council's wider assessment work as discussed above, i.e. that there are no constraints to the sites early delivery.
- 11.22 Should the Inspector consider it helpful this work which is being finalised to support the planning application can be made available to the examination.

Level of detail in policies and proposals maps - is it clear what is proposed, where and when?

- 11.23 The draft policies include detailed criteria in each case which highlight the number of houses proposed and also other key aspects for example where the site access may be expected to be located, the need for landscaping / buffer planting in certain locations, encouragement of renewable energy use, the need to consider noise exposure, odours etc..
- 11.24 The policies therefore include a high level of detail and combined with the overarching Policy SS3, make it very clear what is proposed and also the likely timescales for the development.
- 11.25 The proposals maps then demonstrate where the sites are in terms of a borough wide context.
- 11.26 The Council has also now prepared additional inset maps which provide a further / greater level of detail demonstrating where within the allocated areas development may take place. The maps highlight constraints, access points and other key policy requirements.
- 11.27 It is considered that the written policies, the original proposals map and inset maps together provide a very good level of information and certainty sufficient to meet the requirements of paragraph 154 of the NPPF as discussed further in PPG Ref ID 12-002-20140306.