

Issue 6 – Omission Sites

1.0 Introduction

1.1 Policy SS3 fails the ‘justified’, ‘effective’ and ‘consistent with national policy’ tests of soundness as per earlier representations made by Dandara Ltd to the Proposed Main Modifications to the Plan alongside Hearing Statements prepared for other Issues:

(1) The Plan is in conflict with para. 47 of the NPPF by promoting a level of housing delivery that falls short of meeting the Council’s full, objectively assessed need for market and affordable housing;

(2) The Plan relies on Basingstoke town as a single housing market area to deliver the significant majority of new homes over the Plan period, threatening the deliverability of the Plan and failing to consider reasonable alternatives;

(3) The Plan projects overly optimistic and unevidenced annual rates of completions on strategic housing allocation sites across Basingstoke town;

(4) There is insufficient evidence in the Plan regarding the funding and deliverability of strategic highway and social infrastructure improvements required to allow Basingstoke town to accommodate the number of new homes required;

(5) The Plan fails to consider the ability of the principal sustainable villages across B&D to accommodate additional housing following a wider housing delivery strategy reassessment;

(6) The Plan will fail to provide for and/or demonstrate a 5 year supply of deliverable housing land at the point of adoption.

1.2 In order to be made sound, the Plan should be revised to increase (i) the overall housing requirement to meet full OAHN, (ii) allocate additional baseline sites, (iii) revise the spatial distribution of housing to reduce the over reliance on delivery at Basingstoke; and (iv) identify reserve sites to be released if monitoring indicates a shortfall in the five year land supply position. This would reduce reliance on Basingstoke town to deliver the significant majority of new homes required across the Plan period based upon unevidenced and historically unrepresentative completion rates. It would also represent a more sustainable distribution of housing able to respond to significant unmet need across the Borough as a whole, providing real choice, reducing concerns regarding over-supply and market saturation in Basingstoke as a single housing market area.

2.0 North Field, Overton

2.1 Dandara is promoting residential development of a circa 17 ha agricultural field located to the west of Kingsclere Road in the village of Overton (see site location plan at Appendix 1). The site is well related to the existing settlement pattern of Overton lying to the north of Overton village centre, to the south of the London-Basingstoke-Salisbury railway line, to the east of Overton Primary School and to the north of St Mary’s Church.

2.2 Dandara Ltd is expecting to submit a planning application for up to 200 new homes during October 2015 having received confirmation from the Secretary of State that an EIA is not required following an appeal (ref. NPCU/EIASC/R/H1705/75562). A copy of the illustrative Masterplan for the site is included at Appendix 2 with a copy of the EIA Screening Direction at Appendix 3.

3.0 Overton Village

- 3.1 Overton is one of the most sustainable villages in B&D and benefits from one of only four railway stations in the Borough (Basingstoke 8 minutes and London Waterloo 1 hour).
- 3.2 The Plan recognises at paras. 4.24 and 4.25 that Overton is a sustainable location for growth benefitting from a variety of core local services, good public transport links and a District Centre. The Sustainability Appraisal (SA) recommends that strategic growth across B&D should focus upon Option 2 which would direct the majority of new development to Basingstoke with some distribution to the larger, sustainable settlements of Overton, Whitchurch and Bramley. The village includes a good range of services including a primary school, library, post office, bakery, butchers, convenience stores, PHs, sports facilities, community halls and GP / dental practices.

4.0 North Field Evidence Base

- 4.1 Dandara has considered the evidence base to the Local Plan including the SA (ref. SA01 / 02) and the SHLAA (H004) in order to understand the Council's rationale for not including North Field as a housing development site within the Plan. The Council declined to meet to discuss the potential for the site to contribute to housing delivery within the Plan as per the correspondence with Jill Fisher and Joanne Brombley included at Appendix 4.
- 4.2 The SA refers to the site as OV003 '*Land West of Kingsclere Road*' at para. 8.62 and concludes that the principal challenges to residential development of the site concerns part of the site falling within Flood Zone 2; 'significant' landscape constraints; impact on the setting of Overton Conservation Area and associated heritage assets; the relationship of the site to the existing settlement and concerns regarding the capacity of the highway network. The SA does not however conclude that the site is not developable but surmises that "*these negative impacts may be difficult to overcome through the detailed design and layout of the development*".
- 4.3 The SHLAA concludes for site OV003 that "*this site is available and may, in principle, be suitable and achievable, subject to further testing through the Local Plan process, although there are policy designations and landscape issues which need to be considered*". Both the SA and SHLAA identify that the development of the site does require careful consideration given the local townscape, landscape and heritage context and that additional site specific design work needs to be undertaken to inform the eventual decision making process. The Council has not undertaken any additional assessment work for OV003 as recommended in the SHLAA.
- 4.4 This Statement will now consider the site specific opportunities, and design challenges, associated with introducing residential development onto the site.

5.0 Housing Delivery

- 5.1 Our technical appraisal of the site concludes that it is able to accommodate up to 200 new homes of which 30% would be affordable. This would provide much needed new housing on an available, deliverable and viable site able to come forward during the next 5 year monitoring period to address the significant housing shortfall in the Borough.

6.0 Accessibility to Public Transport

- 6.1 The site benefits from enviable accessibility to public transport modes thus reducing reliance on the use of the private car. The access to the site is circa 0.5 miles from Overton railway

station, being a 12 minute walk or 3 minute cycle. As indicated on the illustrative Masterplan, Dandara has confirmed in principle with Sovereign Housing Association (the adjacent land owner) that a pedestrian / cycle access can be provided from the north-east corner of the site onto Hill Meadow. This would reduce journey distances and times to Overton railway station to 0.3 miles being a 6 minute walk or 3 minute cycle. Of all the potential development sites in Overton and of those omission sites being considered under Issue 6, North Field is the closest to a railway station.

7.0 Accessibility to Local Services

7.1 The access to the site is located 0.4 miles being a 7 minute walk or 2 minute cycle from Overton village centre. Overton benefits from a range of shops and social and community services which cumulatively make the village a sustainable location for future housing growth. Of particular note is the proximity of the site to Overton C of E Primary School as well as the village centre itself. It is noted that the SA at para. 8.64 concludes for the other omission site in Overton, being Pond Close (OV006), that it is *“remote from the village centre and the train station”*.

7.2 As can be seen from the illustrative Masterplan, the development of the site would introduce additional community benefits including significant public open space, facilitating public views back towards the village, playspace and a home working hub. It would ensure that the most sustainably located site in Overton is developed for much needed new homes.

8.0 Foul Drainage

8.1 Pre-application engagement with Southern Water (SW) has confirmed that the sewer system downstream of the site and through Overton village is at capacity. This has been confirmed via the minutes of a meeting held on 8th May 2015 between SW and the Overton NP Group which confirms at para. 5 that Overton’s sewer infrastructure is at capacity and particularly the northern sewer which serves the majority of the village (see Appendix 5).

8.2 The site benefits from a foul drainage solution which has been discussed and agreed with SW. This involves by-passing the existing sewerage system altogether by pumping flows from the site directly to the wastewater treatment works, over land falling within the same land ownership, thus avoiding disruption to the village and potential damage to the SSSI riverine environment. This solution could also relieve pressure on the downstream system by taking flows from the Kingsclere Road system through the North Field site.

8.3 This bypass solution proposed for the site avoids the need to upgrade existing sewers, avoids disruption to the village and provides SW with an opportunity to relieve the existing at-capacity sewerage system. It also means that North Field is the only immediately deliverable housing site in Overton as it does not rely on costly, complicated and time consuming negotiations regarding upgrading works to the majority of the Overton-wide system in order to accommodate development.

9.0 Landscape Impact

9.1 The SA refers to the ‘significant landscape constraints’ of the site despite the site not being covered by any specific landscape designation. The boundary of the AONB is located immediately to the north.

- 9.2 Appendix 6 includes selected wirelines that considers views to the site from the AONB and views from the site towards the AONB. This assessment work, which has not been used by the Council to inform the emerging Plan or supporting evidence base despite being made available to them, concludes that there are **little to no perceivable views of the site or development from publicly accessible areas from the AONB**, largely due to topography and the strong vegetation framework.
- 9.3 We would recommend to the Inspector that this point can be easily understood from a site visit to the AONB, where the very strong visual buffer of the railway embankment, general topography and mature tree belts can be readily appreciated.
- 9.4 In respect of non AONB landscape and visual matters, the development of the site would change the use of the land from agricultural fields to housing, public open space and associated infrastructure, and will result in some impacts on local views adjacent to the site and from limited locations within the village of Overton. Such locations are not unusual or particularly sensitive.
- 9.5 The EIA Screening Direction received from the SoS, informed by the appended wirelines, concluded that *“the Secretary of State is of the view that no likely significant effects upon the AONB are envisaged. This is as a result of the site’s proximity to the AONB, screening and topography”* (ref. NPCU/EIASCR/H1705/75562).

10.0 Heritage and Conservation Impact

- 10.1 The application site does not contain any designated heritage assets and does not fall within a Conservation Area. A Landscape Visual Appraisal and Heritage Appraisal have been prepared and confirm the following:
- There are clear open views from within the site and the public right of way to the immediate south of the site;
 - There are views of the site from Kingsclere Road, to the north of St Mary’s Church and south of Foxdown, which are partly filtered by intervening buildings and vegetation;
 - There are a limited number of views of the site from nearby private residences. It is not anticipated that any statutory listed private residences will experience views of the proposed development;
 - There are views of the site from the Grade II* listed Church of St Mary’s graveyard (its historic setting) to the south, but there are limited to no views from the southern (front) side of the church. It should be noted that this is in contrast to Overton Hill, an allocated and permitted site within Policy SS3 of the Plan which is both visible from the churchyard and, unlike North Field, within the backdrop of views of the Church itself from the graveyard, and;
 - Due to existing buildings blocking views, there are filtered more distant views of the site from within the village and the Conservation Area, such as from very limited sections of Sapley Lane, London Road and Winchester Street, principally of the higher slopes within the site;
 - The triangular form of St Mary's Church spire can be seen, at distance, in some long views from Winchester Street. The spire appears above a changeable built horizon line created by the existing village roofscape in the foreground, with the upper part of North Field and open countryside beyond to the north forming the backdrop to the spire in these views.

- 10.2 This work has informed the illustrative Masterplan to ensure the scheme assimilates successfully into its landscape, visual and historic context including:
- Setting the development extent away from the site's southern boundary to maximise landscape off-set from St Mary's Church;
 - Setting development away from the higher ground to the east and west of the site, to avoid the proposed development being part of the horizon when viewed from different locations within the village and Conservation Area;
 - Setting development out of the view cone of St Mary's Church spire as viewed from Winchester Street to ensure the primacy of the spire is unchallenged within an open, green backdrop;
 - Ensuring buildings and landscaping are arranged carefully across the site's topography, which is most apparent in long views.
- 10.3 It is therefore concluded that the impact of development upon designated heritage assets will also be limited to changes in the setting of St Mary's Church and the wider setting of the Conservation Area and, though some degree of change to the wider setting of these assets will result, the indirect impacts arising are expected to only be slight to moderate. The EIA Screening Direction concluded that *"the SoS is of the view that impacts upon heritage assets will be limited and not of any significance given the changes in the settings of the St Mary's Church and wider setting of the Conservation Area"* (ref. NPCU/EIASCR/H1705/75562).

11.0 Flood Risk

- 11.1 A small part of the site, running through the centre, is identified by the EA as being Flood Zone 2. It is acknowledged that the centre of the site experiences some surface water flood risk which has been taken into account on the illustrative Masterplan with development being located away from this area. It is however incorrect that the EA has identified part of the site as Flood Zone 2 as the site is not at risk from sea, river or reservoir flooding and cannot therefore be Flood Zone 2. We are of the opinion that the flooding indicated by Flood Zone 2 on the flood map is either surface water or potentially groundwater in extreme events and as such should not be shown on the 'Flood Map for Planning (Rivers and Sea)' as Flood Zone 2.
- 11.2 In any event, development has been removed from any part of the site at risk from surface water or groundwater flooding and has been included as public open space.

12.0 Highways and Transport

- 12.1 Dandara is not aware of any in principle concerns regarding site access which can be taken off Kingsclere Road nor the capacity of local junctions which would be assessed as part of a Transport Assessment undertaken in association with any future application. Additional evidence on highways and transport can be reported verbally if required should it be raised in other Participant Statements.

13.0 Other Considerations

- 13.1 Dandara is not aware of any in principle concerns regarding land contamination, ecology, trees, archaeology, noise / air quality impact or associated development impacts which could impact upon the development of the site. Whilst a local SINC is located to the west along Court Drove, all development is set away from the western boundary as shown on the illustrative

Masterplan. The EIA Screening Direction concluded that *“there exists limited habitat connectivity between the site and SSSI”*.

14.0 Designations

14.1 The only formal designation accruing to the site concerns the centrally located Flood Zone 2 which we have addressed previously. The site is not identified as forming part of a future Strategic Gap, within a Detailed Emergency Planning Zone (DEPZ) associated with Aldermaston or contains listed buildings as with other omission sites being considered under Issue 6.

15.0 Conclusion

15.1 Dandara aims to bring forward new homes on land to the west of Kingsclere Road in Overton via the submission of a planning application in October 2015. It is considered that in order to make the Plan sound, a more equitable spread of development is required across B&D and particularly in the more sustainable villages, as well as the housing target increasing across the board. The site represents ‘unconstrained land’ which is sustainable, viable and deliverable being:

- Located outside any Green Belt, AONB, SSSI or formal landscape designation;
- Subject to detailed view assessment work which has demonstrated that the site is not visible from within the AONB;
- All new housing able to be introduced onto Flood Zone 1 land;
- The site not containing any listed buildings nor located in a Conservation Area nor having any significant impact upon their setting;
- Located within a 12 minute walk of Overton railway station, one of only four stations in B&D;
- Located within a 7 minute walk of the various shops, services and social and community facilities within Overton village centre;
- Located immediately adjacent to Overton Primary School;
- No legal or ownership issues that prevent delivery;
- Localised landscape and heritage setting impacts able to be mitigated through detailed scheme layout work as per the accompanying illustrative Masterplan at Appendix 2.

15.2 To inform this Statement we have undertaken a comparative assessment of omission sites being considered under Issue 6 which is attached at Appendix 7. This has confirmed that North Field is the most sustainably located in terms of accessibility to public transport and local services and does not conflict with any emerging Local Plan policies including strategic gaps or the DEPZ. This is not withstanding our view that more than one of the omission sites needs to be included in the Plan in order for it to be found sound, particularly from a total housing numbers and 5 year housing land supply perspective.