
Basingstoke & Deane Local Plan Examination

Issue 4 – Other Housing Matters

Further Statement on behalf of Gleeson Strategic

Respondent ref: 816809

Further Statement to the Basingstoke and Deane Draft Local Plan

On behalf of Gleeson Strategic (Respondent Ref: 816809)

Contents

1.	Introduction	1
2.	Overview	2
3.	Response to Questions	3

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1. Introduction

- 1.1. This Hearing Statement has been prepared by Savills incorporating Smiths Gore on behalf of Gleeson Strategic ('**Gleeson**') in respect of its interests on land to the north of Sherfield Road, Bramley, herein after referred to as '**the Site**'¹. It sets out representations in response to Issue 4 of the Hearings Programme relating to the Examination of the draft Basingstoke and Deane Local Plan ('**the BDLP**').
- 1.2. The purpose of this Statement is to submit further representations to assist in discussing the questions raised by the Inspector.
- 1.3. This Statement should be read in conjunction with both our previous representations to the draft BDLP and the separate Hearing Statements being submitted on behalf of Gleeson in response to Issues 3 (Spatial Strategy and Housing Need) and 6 (Omission Sites) of the BDLP Examination.

¹ The Site is also known as Land at Strawberry Fields which has been assessed in the Strategic Housing Land Availability Assessment under reference BRAM010.

Further Statement to the Basingstoke and Deane Draft Local Plan

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2. Overview

- 2.1. As set out in our representations in respect of Issue 6, it is our view that our client's site to the east of the urban area of Bramley is capable of an appropriate expansion in a sustainable manner. It is further contended that this is entirely within the stated spatial strategy of the BDLP and fully in accordance with meeting the housing needs of the area. The Site's omission from the BDLP is unsound because it means that the Plan does not represent the most appropriate strategy, as required by paragraph 182 of the National Planning Policy Framework.
- 2.2. In previous representations before the Inspector, we have expressed disappointment that the Council has made strenuous efforts to interpret various studies of housing need and employment growth as supporting the lowest possible growth for the plan period. We do not feel that recent publications from the Council (dated August and September 2015) change that approach. Furthermore, we feel that the additional allocations proposed in the Main Modifications follow an approach where they are to be few in number and large in scale, directed solely to Basingstoke rather than being proportionately distributed to both Basingstoke and the identified sustainable settlements elsewhere (in line with the previous spatial strategy of the Plan). This, in our view, unbalances the spatial strategy and harms its soundness unnecessarily.
- 2.3. With this overview as our guiding principle, the remainder of this document responds to each of the questions raised by the Inspector.

Further Statement to the Basingstoke and Deane Draft Local Plan

On behalf of Gleeson Strategic (Respondent Ref: 816809)

3. Response to Questions

“5.1 Is the Plan’s distribution of overall housing development, ... justified and at the right level of detail for the Plan?”

- 3.1 The overarching strategy seeks to focus new homes in and around the edge of the Borough’s main settlements, primarily Basingstoke and to a lesser extent the larger settlements of Whitchurch, Overton, Bramley, Kingsclere and Oakley. This, through the Sustainability Appraisal, is the Council’s preferred approach.
- 3.2 The proposed modifications to the BDLP do not, however, follow this strategy and instead, distribute additional housing land at Basingstoke in the form of an additional greenfield allocation and two brownfield sites.
- 3.3 This compounds our concerns raised in our previous representations that, as a result of the Main Modifications, the BDLP is overly reliant on the delivery of a few large sites on the edge of Basingstoke (e.g. Hounsome Fields, Manydown, Basingstoke Golf Course, all of which are over 750 dwellings and will require significant Masterplanning and infrastructure). This focus, without commensurate increases in the second tier settlements, unbalances the spatial strategy and to mitigate this risk, greater use of the opportunities available in the other towns should be made.
- 3.4 The allocation of smaller, available sites such as our client’s land at Bramley, would contribute to meeting the demand, helping to support and maintain local services as well as provide a mechanism through which much needed local affordable housing can be provided.
- 3.5 The uplift in housing numbers should be proportionate across the spatial area in accordance with the strategy, affording increased growth in these smaller settlements. Should the Inspector consider that further housing growth (above the 850 dpa) is necessary then, whilst it may be appropriate to consider additional allocations at Basingstoke, these should always be balanced with proportionate increases in the rural settlements to maintain the spatial strategy.
- 3.6 As such, the uplift in housing numbers (to 850 dwellings per annum, dpa) should result in an increase in the housing allocation at Bramley – at the least, to the 300 dwellings which has been assessed in the Sustainability Appraisal (which has shown there to be no significant environmental impacts of delivering 300 dwellings here, over the delivery of 200 dwellings as already proposed in the BDLP). In fact, it is our view that Bramley could accommodate higher numbers than this given the range of services and facilities it contains and in light of the need to increase early housing delivery in the Borough.
- 3.7 In their Statement of August 2015, the Council assert that:

“Additional site allocations would be unlikely to lead to an early resolution of the undersupply in light of lead in times and it is considered that it would be an unrealistic assumption to address the shortfall in five years even if more sites were allocated”.

Further Statement to the Basingstoke and Deane Draft Local Plan

On behalf of Gleeson Strategic (Respondent Ref: 816809)

3.8 This is patently not the case: the site at Sherfield Road, Bramley is available and suitable for development, and would be capable of delivering up to 130 dwellings within the next 5 years. This would contribute towards the five year housing land supply and maintain a balanced spatial strategy for the BDLP i.e. by not simply focussing all new growth at Basingstoke, and on larger sites which have infrastructure and other requirements that give rise to significant lead in times (as the Council suggest).

“5.2, 5.3, etc to 9”

3.9 We have no comments to make.

“10. Neighbourhood Plans: Does policy SS5 provide an acceptable level of guidance for the preparation of Neighbourhood Plans, especially in relation to the delivery of housing?”

3.10 The Council has acknowledged within the BDLP that Bramley is one of the more sustainable settlements in the Borough outside of Basingstoke and as such, is suitable for accommodating additional development in the plan period. The Sustainability Appraisal acknowledges its potential to accommodate 300 homes, without any greater environmental impact than the delivery of 200 homes (as currently proposed in Policy SS5 of the BDLP2). Our previous representations set out clearly the opportunity that our client's site has to participate in that future.

3.11 However, the policy should support the overall strategic objectives and the responsibility for ensuring that the villages play their part in delivering the overall strategy should be shared between the BDLP and neighbourhood planning. There should be both a specific allocation of land necessary to ensure that sustainable development is directed to the villages (i.e. through additional allocations within Policy SS3) as well as an allowance for the neighbourhood plan to direct as it responds to the local circumstances (in Policy SS5). This ensures that the villages are not prevented from assisting in delivering the needs of the Borough as a whole.

3.12 This mixture of specific allocations and local decision making would also ensure that where the monitoring policies of the Plan provide evidence, that appropriate levels of development can be made available in the villages without the need for a review of the Plan as a whole.

3.13 Therefore, in the case of Bramley the BDLP should allocate land for at least 300 dwellings in Policy SS3 (including the land at Sherfield Road, BRAM010), and identify an additional contingency allowance for the Neighbourhood Plan to identify and deliver in Policy SS5.

² See representations made by Savills (incorporating Smiths Gore) on behalf of Gleeson Developments Ltd to the June 2015 'Main Modifications' consultation.

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