

Basingstoke and Deane Local Plan Examination Hearing Statement – Issues 3 and 4

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1 COMMENTS IN RELATION TO ISSUES 3 AND 4

- 1.1 We act on behalf of Hollins Strategic Land and hereby submit our Hearing Statement in relation to Issues 3 and 4 of the Basingstoke & Deane Local Plan examination.

Policy SS1 – Scale and Distribution of New Housing

- 1.2 The Inspector has previously expressed serious concerns over Policy SS1 ('Scale and Distribution of New Housing') of the Submission Local Plan, as set out in his letter to the Council dated 12 October 2014. These concerns were reiterated during the subsequent exploratory meeting held on 11 December 2014. For brevity we do not rehearse the Inspector's comments in full here, although we wish to emphasise the serious concern raised over the proposed housing requirement and the extent to which the Submission Local Plan was consistent with the imperative in the National Planning Policy Framework (NPPF) to 'boost significantly' the supply of market and affordable housing.
- 1.3 We note that the Council has since suggested proposed modifications seeking to address the points raised by the Inspector, and as set out in our previous representations we remain unconvinced that the proposed modifications fully address these concerns and we do not consider that the Plan can be found sound in its current form.
- 1.4 While we welcome the acknowledgement that the annual dwelling requirement should be higher than 748 dpa, it is clear that the revised 850 dpa figure is still some way short of the base position in the South East Plan of 945 dpa and therefore may not achieve the significant boost in housing envisioned in the NPPF. On that basis we find the proposed modification to be deficient and in order for the plan to be found sound and consistent with the NPPF a higher evidence-based dwelling requirement should be pursued.
- 1.5 We have examined the Housing Topic Paper (May 2015) and associated Strategic Housing Market Assessment Update (May 2015), which is underpinned by a Demographic Forecasts Report by Edge Analytics (April 2015). We note that the Council has also recently published a new Housing Needs Statement (August 2015), which seeks to draw together the findings of the aforementioned documents to justify the proposed new housing requirement of 850 dpa.
- 1.6 However, we note that at the Exploratory Meeting in December 2014 it was suggested by the Inspector that a figure of 853 dpa would appear to be within the range which relates to current demographic assumptions. We are concerned that the Council has simply interpreted this as the Inspector's preference and has subsequently retrofitted its evidence to support this figure, rather than seeking to determine an alternative and appropriate housing requirement based on a fresh look at the evidence.
- 1.7 Accordingly, we still consider that there is insufficient rationale for selecting the new target of 850 dwellings per annum (dpa) when the evidence suggests that a figure closer to 1,000 dpa may be justified. A higher figure would be more in line with the NPPF aspiration to 'boost significantly' the supply of housing, and would appear to be

more appropriate consideration the South East Plan target of 945 dpa. On this basis we do not believe that the scale of development proposed in Policy SS1 is fully justified or sound.

Policy SS3 – Greenfield Site Allocations

- 1.8 Accordingly, we consider that further specific allocations are required to provide greater certainty of housing delivery, although suitable sites should be identified across the Borough to ensure sufficient choice and flexibility. We note that in response to the increase in the dwelling requirement the Council is now proposing yet another allocation in Basingstoke Town at Hounsome Fields (Policy SS3.12), which the Council expects to deliver 750 houses. We are concerned that the Local Plan has effectively become a blueprint for the growth of Basingstoke Town rather than a strategy to meet housing needs arising across the Borough. We have serious reservations regarding the sheer scale of housing allocations adjoining Basingstoke Town and the realistic level of delivery that the market will be able to support. There is a genuine danger that the Council's proposed approach of directing approximately 6,660 houses towards Basingstoke Town will lead to over saturation, which will in turn dampen rates of delivery. While we recognise that the plan period runs until 2029, in the short to medium term it is highly unlikely that development at these sites will be anywhere near the rates needed to maintain a rolling five-year supply.
- 1.9 We are surprised that the Council has chosen not to proportionally increase the housing allocations in other settlements. No evidence has been advanced to fully justify why the uplift in housing that results from the increased dwelling target should be met almost wholly in Basingstoke Town. The Council has not explained why a proportionate amount of additional housing has not been directed towards the other settlements. The objectively assessed need is for the whole of Basingstoke and Deane Borough, and so if the overall dwelling requirement is higher then it follows that this housing need exists in locations other than Basingstoke Town. On that basis we submit that the Council has failed to consider all reasonable alternatives, and has not sufficiently justified its proposed approach.
- 1.10 We therefore have serious concerns over realistic rates of housing delivery at the proposed large greenfield allocations in and around the peripheral edges of Basingstoke Town, which are remote from the centre and which are unlikely to come forward at the speed needed to ensure a rolling five-year housing supply. A far more sustainable approach would be to allocate additional land in and around other main settlements with a good range of facilities, such as Bramely, where there are suitable and well located sites close to public transport infrastructure and local services. Policy SS3 is not, therefore, considered to be sound.

Policy SS4 – Ensuring Supply

- 1.11 We note that Table 2 of the Submission Local Plan as amended in the proposed modifications document set out the components of housing supply for the period 2011 to 2029, and included unallocated urban/brownfield opportunities which collectively amounted to 2,820 dwellings after applying a discount of 10 per cent for non-delivery. However, that the Council has now published a new Housing Land Supply Statement (August 2015), which updates the base date to 1 April 2015. The key differences

between the previous version of Table 2 and the latest updated version is that the number of commitments has increased from 2,535 dwellings to 4,668 dwellings, whereas the number of dwellings expected to come forward from unallocated urban/brownfield opportunities has now reduced to 1,323 dwellings.

- 1.12 We have previously expressed serious reservations over the heavy reliance on unallocated urban/brownfield opportunities to meet the housing target and we do not consider this to be a sound basis on which to plan for future housing delivery in the Borough. While we recognise that the Council has now reduced its reliance on this site source, we remain concerned that the Council is still hoping for a large number of units to come forward at sites with questionable planning status.
- 1.13 The Planning Practice Guidance is instructive on this matter and explains (Paragraph: 031, Reference ID: 3-031-20140306) that although planning permission or allocation in a development plan is not a prerequisite for a site being deliverable, local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. Although this advice is made in relation to the inclusion of sites within the five-year supply, the general thrust of this guidance is equally relevant in the consideration of land that is expected to come forward for development during the Plan period.
- 1.14 We acknowledge that these sites may have been assessed in the Strategic Housing Land Availability Assessment (SHLAA), but that does not mean that it is safe to assume they will come forward for development over the Plan period. These unallocated sites have no planning status, and although it is reasonable to assume that some may contribute towards housing delivery and therefore a modest allowance could be made for this source of supply, we are concerned by the extent of the Council's reliance on delivery from these sites. The Council's assumed contribution from this source still equates to approximately 1.5 years' worth of supply against the 850 dpa target. The Council has applied a 10 per cent discount to sites that it has assessed as likely to come forward in years 6-10 and 10-15 of the plan period, but has not applied this discount to sites that it hopes will come forward in the first five years. We are concerned that this approach is not sufficiently cautious, and consider that the 10 per cent discount should be applied to all sites in this category.
- 1.15 We maintain that Plan remains heavy over-reliant on SHLAA sites to meet the Council's challenging dwelling requirement, and that this jeopardises the soundness of the Plan and is not a robust or sound approach on which to plan for the future of the Borough. We therefore submit that the Plan fails to demonstrate a robust, flexible and demonstrable deliverable supply of housing land, and that as a result Policy SS4 is unsound.

Policy SS5 – Neighbourhood Planning

- 1.16 We have a fundamental objection to the principle of proposed Policy SS5 (Neighbourhood Planning), in particular the notion that the allocation of housing in Bramley should be wholly delegated to the emerging neighbourhood plan. The justification provided is that *'This approach recognises the strength of local discontent with recent development in the village'* (paragraph 4.29 of the Submission Local

Plan). This is simply not a valid justification, nor is it a relevant consideration when deciding how to allocate land for new development. We are extremely concerned that the Council seems to be avoiding taking any decisions on this important matter, and instead is content to leave this up to the neighbourhood plan.

- 1.17 To remedy the serious shortcoming referred to above, further housing should be allocated in other parts of the Borough, in settlements such as Bramley where proportionally it would not be unreasonable to accommodate at least a further 200 or so dwellings. For clarity, this should be in addition to the 200 units that have planning permission at Minchens Lane. On this point we note that there has been some uncertainty over whether Bramley is expected to accommodate any further housing growth. At one stage the Submission Local Plan envisioned an additional 200 dwellings in Bramley, to be delivered through the Neighbourhood Plan, while at the same time the emerging Neighbourhood Plan made no allowance for additional housing as the Minchens Lane scheme was regarded as fulfilling this requirement. In our previous representation we therefore assumed that the 200 units ascribed to Bramley would be over and above the Minchens Lane consent. However, we now note that in Figure (iv) of the Updated Housing Supply Statement (August 2015) the Council notes that the 200 homes at Minchens Lane negate the need for further housing allocations in Bramley within the plan. This is then reflected in Appendix 1 of the Updated Housing Supply Statement which includes no allowance for further housing in Bramley.
- 1.18 We have serious concerns over this approach. Firstly, we have never seen any clear or convincing evidence to justify why Bramley was only allocated 200 dwellings in the first instance. This figure seems to have been put forward arbitrarily and in our view it does not reflect the ability of this settlement to support a greater level of growth. Bramley is described in the Submission Local Plan as a large village, and is recognised as having a range of local facilities including a train station. Secondly, if the housing requirement across Basingstoke and Deane Borough is to be increased then Bramley is ideally placed to accommodate some of this additional growth. The Council has not clearly explained why almost all the uplift should be met adjacent to Basingstoke Town at the expense of the other settlements. This appears to ignore housing needs in the wider area and as stated above it places heavy reliance on delivery in one part of the Borough. A more balanced portfolio of sites is needed in a range of locations to ensure that a flexible and responsive supply of land is available.
- 1.19 On this basis we consider that Policy SS5 is unjustified and unsound.

Policy EM2 – Strategic Gaps

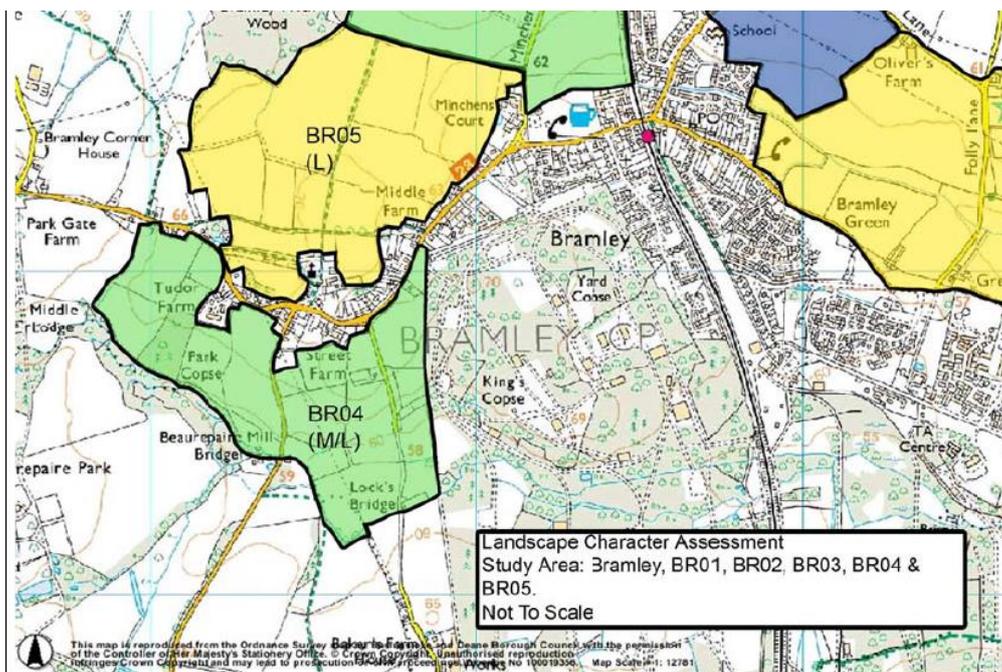
- 1.20 We have serious concerns over the proposed designation of Strategic Gaps, and the large extent of the areas these may cover. There is a dearth of clear and convincing evidence that points toward any actual need for a Strategic Gaps policy in the new Local Plan, over and above proposed Policy SS6 ('New Housing in the Countryside') which seeks to control development proposals for new housing outside of the settlement boundaries.
- 1.21 We note that the Council has published a Strategic Gaps Topic Paper (October 2014), which aims to justify the proposed approach. This document confirms that the

Strategic Gaps are a planning tool to prevent coalescence of settlements and to maintain their separate identity, rather than to specifically protect the countryside or landscape. The Topic Paper points towards a range of evidence base documents, including a Landscape Assessment (2001) and Landscape Capacity Studies (2008 and 2010) to support the selection of areas for Strategic Gaps, which have been chosen based on the following criteria:

- a) The land to be included within the gap is open and provides a sense of separation between settlements.
- b) The land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence (in particular from land allocations in the Local Plan).
- c) In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included, having regard to maintaining their physical and visual separation.

1.22 We consider that the above criteria have not been correctly applied, and that there are clearly areas within the proposed Strategic Gaps that do not fall within these parameters. For instance, looking at the proposed Basingstoke/Chineham – Bramley/Sherfield on Loddon Strategic Gap, there are areas of land that are included which if developed would not lead to any appreciable diminution of the gap, or have any effect on the identity of Bramley in terms of its relationship to any other settlement area. The same is true of many other areas of proposed Strategic Gap.

1.23 Moreover, some of the land proposed for inclusion is assessed in the evidence base documents referred to above as being of only low/medium landscape value – for example area BR04 (‘North Bow Brook Slopes’) as shown in the extract below from the 2008 Landscape Capacity Study:



- 1.24 We also note that area BR04 is not listed in the table at pages 20-22 of the Strategic Gaps Topic Paper as forming part of the Basingstoke/Chineham – Bramley/Sherfield on Loddon Strategic Gap, but this land has been included in Policy Map 7d of the Pre-Submission Local Plan and Inset Map No.4 of the Submission Local Plan. This land therefore appears to have been erroneously included and should be removed.
- 1.25 While we acknowledge that the purpose of the gap is not to protect areas of landscape sensitivity, the 2008 report does make specific reference to the potential for coalescence with regard to various parcels of land that could merge settlements if developed. No such comments are made in relation to BR04, and indeed many other areas of land that have been included within the proposed Strategic Gaps. There appears to be no actual assessment of the potential of land that has been provisionally included to lead to coalescence and/or the erosion of the district identity of settlements. Instead, the evidence used by the Council is largely related to landscape sensitivity, which by the Council's own admission is not related to the purpose of including land within the Strategic Gaps. We therefore submit that there is no real directly relevant evidence to support the Strategic Gaps as currently proposed.
- 1.26 Thus, there appears to be a worrying disconnect between the evidence presented to support the need for these gaps and the selection criteria used to determine their extent, and the actual boundaries that have been drawn in the Local Plan. We also note that in any case draft Policy EM2 does not preclude development per se, and allows proposals provided they:
- would not diminish the physical and/or visual separation; and
 - would not compromise the integrity of the gap either individually or cumulatively with other existing or proposed development; or
 - it is proposed through a Neighbourhood Plan or Neighbourhood Development Order, including Community Right to Build Orders.
- 1.27 Therefore, it is clear that provided some or all of the above can be satisfied then development can be permitted at land in Strategic Gaps. On this basis, and considering the total lack of any real evidence to underpin the selection of land for inclusion, we consider that the Strategic Gaps policy should be abandoned altogether.
- 1.28 If the Council and/or Inspector are still minded to retain some form of restriction on development that would cause coalescence of settlements then this could potentially be rolled into the wording of proposed Policy SS6, which could be expanded to control development on sites in the countryside that would merge settlements if developed. This would be a more sensible approach than washing over vast swathes of land with a blanket Strategic Gap policy, when a large proportion of the land within these areas would not actually offend the purpose of the Strategic Gap if they were to be developed.