

**Basingstoke & Deane Local Plan Examination**

**ISSUE 3: SPATIAL STRATEGY & HOUSING NEED - HEARING STATEMENT**

**SUBMITTED ON BEHALF OF THE HIGHCLERE ESTATE**

**September 2015**

Table of Contents

**1 INTRODUCTION ..... 3**

**2 ISSUE 3..... 4**

PARAGRAPH 4.1 – SPATIAL STRATEGY & HOUSING NEED / POLICY SS1 ..... 4

PARAGRAPH 4.8 – AFFORDABLE HOUSING / POLICY CN2 ..... 5

PARAGRAPH 4.13 – SOURCES OF DEVELOPMENT LAND ..... 7

PARAGRAPH 9 – HOUSING IN THE COUNTRYSIDE / POLICY SS6..... 8

**3 CONCLUSIONS ..... 9**

# 1 INTRODUCTION

- 1.1 This statement is submitted on behalf of the Highclere Estate in respect of the Basingstoke and Deane Local Plan Examination.
- 1.2 It follows previous submissions made by Carter Jonas throughout the Local Plan process and most recently in June 2015.
- 1.3 It addresses the following issues identified by the Inspector in the form of questions to be considered at the Examination Hearing under Issue 3:
  - Paragraph 4.1 – Spatial Strategy and Housing Need / Policy SS1;
  - Paragraph 4.8 – Affordable Housing / Policy CN2;
  - Paragraph 4.13 – Sources of development land; and
  - Paragraph 9 – Housing in the countryside / Policy SS6.

## 2 ISSUE 3

### PARAGRAPH 4.1 – SPATIAL STRATEGY & HOUSING NEED / POLICY SS1

- 2.1 We consider that Policy SS1 (Scale and Distribution of New Housing) has not been positively prepared based on a strategy which seeks to meet the objectively assessed development and infrastructure requirements of Basingstoke & Deane Council (“the Council”).
- 2.2 Part a) of Policy SS1 states that sites (and thus land) outside of a settlement boundary will automatically be considered to lie in the countryside. There is no justification provided by the Council to support this approach and we will demonstrate that that such a blanket approach is flawed and illogical.
- 2.3 We accept that where a site or land is isolated and separate from a settlement, that such an interpretation would be justified.
- 2.4 However, where a site or land adjoins the settlement boundary, it is simply not plausible to define every one of those sites or parcels of land to be defined as countryside. Such an approach ignores the physical condition and features of each site or parcel and ignores the fundamental planning principle that every case, and thus every site or parcel of land, should be assessed on its merits.
- 2.5 The problem with the approach advocated by the Council is that it gives the same weight and policy protection to all countryside sites or land, and this approach is not supported by Government guidance set out in the NPPF at paragraph 52 where it states that *“the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages that follow the principles of Garden Cities.”*
- 2.6 We have highlighted the relevant sections which provide for a flexible and common sense approach. The approach suggested by this policy is neither and it is clear that this policy does not accord with national guidance.
- 2.7 It is important to comment on the reference to Garden Cities in national planning policy guidance and for this to be used as the reason why the policy is allowed to remain unchanged.
- 2.8 There will be of course be instances of sites or land that can provide extensions to villages but given their size, would not be able to demonstrate every one of the 10 Garden City Principles – for example, provide a robust range of employment opportunities in the style of a Garden City. And it must be right that these smaller proposals are allowed to succeed because if you have a village of say 1,000 homes, and a small extension of 50 homes is proposed, it would not be reasonable to assume that such a small proposal would feature every element of a Garden City, simply because they are not big enough. This pattern of incremental growth is the historic means by which almost all of our villages and towns have grown, normally by development of another field on the edge of the settlement, and this is the pattern that is evident throughout Basingstoke and Deane.

2.9 In seeking to apply this policy, the Council will clearly restrict opportunities to develop sites that can provide sustainable and logical village extensions that benefit from existing infrastructure and services. The development of sites adjoining existing settlements is likely to be easier to deliver and make a full contribution to meeting the housing need in an effective and meaningful manner.

2.10 It is self-evident that these sites offer a sustainable option for development that will assist in the delivery of high quality places consistent with the design principles of the Garden City movement. The policy should be changed to allow for the possibility of these developments and be written in permissive terms because there is no doubt that such developments could be supported where these:

- Have a clear vision and firm commitment from developers together with undertaking a inclusive and transparent approach with key stakeholders and the local community;
- Provide a mixed-tenure of homes and housing that are genuinely affordable for everyone;
- Are beautiful and imaginatively designed with gardens, combining the very best of town and county living to create healthy homes in vibrant communities;
- Do not diminish the natural environment and provide for a net gain in biodiversity; and
- Are well integrated and accessible by a range of public transport.

2.11 In order for compliance with national planning policy, we suggest the words ‘and on the edge of’ be added to part a) and the words ‘outside of’ are deleted and replaced with ‘separate from’. The revised wording will then ensure the Council could resist development that is isolated but ensure sites that are ‘on the edge of’ settlements are not immediately disregarded for being within the countryside.

2.12 We contend that the policy should read:

*“Permitting development and redevelopment within **and on the edge of** the defined Settlement Policy Boundaries, which contribute to social, economic and environmental well-being. Sites ~~outside of~~ **separate from** defined Settlement Policy Boundaries will be considered to lie in the countryside;”*

#### **PARAGRAPH 4.8 – AFFORDABLE HOUSING / POLICY CN2**

2.13 Policy CN2 states that the total amount of the affordable element should always compromise the greater proportion of units in comparison to the market units proposed. Again, this blanket approach is considered to be unreasonable and is not consistent with national planning policy guidance.

- 2.14 It is unreasonable because it precludes the possibility that having applied the criteria in (a) – (d), including a viability assessment, the amount of market housing might have to exceed the amount of affordable housing in order to deliver a site.
- 2.15 This is clearly unreasonable.
- 2.16 It also ignores the guidance provided in at paragraph 173 of the NPPF where it states that “to ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of normal costs of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”
- 2.17 If the policy is applied as it is written, where the development would result in less than a majority of affordable housing, the application could be refused. This is too inflexible.
- 2.18 We suggest for the Council not to compromise the delivery of housing (both market and affordable), the sentence that refers to the greater proportion of units in comparison to the market units proposed should be amended to read as follows:

*“Subject to local housing priority, local circumstances, viability and market conditions, under this policy a proportion of market housing will be permitted. In such cases, the affordable element of the development should always comprise the ~~greater proportion~~ **maximum number** of units in comparison to the market units proposed. The council will only permit the minimum number of market homes required to deliver the scheme.”*

## PARAGRAPH 4.13 – SOURCES OF DEVELOPMENT LAND

- 2.19 We contend that the Council's approach is too reliant on brownfield development land for new homes and they are overlooking opportunities to develop sustainable sites that provide logical extensions to existing settlements, and specifically villages. We consider that this stems from the restrictive approach proposed under Policy SS1. There is a logical and sustainable contribution to be harnessed from Greenfield sites.
- 2.20 Should the Council amend the wording of Policy SS1 as we have suggested above in response to paragraph 4.1, it would reduce the unreasonable reliance on brownfield sites, and would encourage development that is sustainable, logical and in accordance with national policy guidance. Paragraph 4.13 should be amended to read:

*“The Local Plan supports the principle of developing appropriately located brownfield sites and making the best use of regeneration opportunities in the urban area, while recognising the needs of different housing market areas to meet needs. This approach has enabled the council to manage and control the amount of Greenfield land required to meet growth. The approach set out in the Local Plan will ensure protection of the borough's environmental assets through allocating 0.4% of the borough's Greenfield land for development over the plan period. **However, it is recognised that the release of suitably located Greenfield land is consistent with the guidance in the NPPF concerning the extension of existing villages and towns with developments that reflect the principles of Garden Cities.**”*

## **PARAGRAPH 9 – HOUSING IN THE COUNTRYSIDE / POLICY SS6**

2.21 We support the broad purpose of Policy SS6. Consistent with our representations on Policy SS1, it will be necessary for this policy to acknowledge the scope for sites adjoining existing settlements to come forward for development and for such proposals to be explicitly supported by this policy.

2.22 We propose that the first part of the policy needs to be amended with new text inserted to make specific provision for such sites or parcels of land and the following is proposed:

*Development proposals for new housing immediately adjoining existing Settlement Policy Boundaries will be permitted where they are:*

- a) Contiguous with a settlement policy boundary;*
- i) They do not result in an isolated form of development;*
- ii) The site is not of high environmental value; and*
- iii) The proposed use and scale of development is appropriate to the site's context.*

2.23 The remainder of the policy can be left unchanged.



## 3 CONCLUSIONS

- 3.1 The proposed changes to Policies SS1 and SS6 seek to provide explicit support for the possibility of Greenfield extensions to existing villages and towns being possible, consistent with the guidance in the NPPF concerning the Garden Cities principles, and subject to specific criteria contained in a revised Policy SS6.
- 3.2 This is considered to be a flexible and pragmatic policy approach that is consistent with national guidance and will enable the maximum housing need.
- 3.3 On this basis and if these revisions are made, the Plan will be made sound.