

# Basingstoke and Deane Borough Council

## Local Plan Examination in Public

### Issue 4: Other Housing Matters Hearing Statement



## 1.1 Introduction and Background

- 1.1.1 Basingstoke & Deane Borough Council and Hampshire County Council (together being described as "the Landowners") of the Manydown site have previously made representations in response to policy EM2 Strategic Gaps. This statement sets out where objections to the policy remain and includes suggestions on how the policy can be made sound with modifications.

*Are the Plan's landscape protection policies (EM1-3) sound and how much weight should be given to them as constraints to new development? How important are the proposed strategic gaps and how should they be designated?*

- 1.1.2 The importance of the landscape protection policies, in particular policy EM2, has been recognised throughout the development of the Local Plan. The strategic gaps are a planning tool to prevent the coalescence of settlements and therefore maintain the separate identity of settlements. They are not a landscape designation, nor necessarily indicative of the quality of the landscape *per se*. However, with regards to the Local Plan's greenfield site allocations, in particular policy SS3.10 Manydown, it is still considered that policy EM2 as drafted would unduly restrict delivery of wider infrastructure that may be needed to support the development of the first phase of Manydown. It is for these reasons that policy EM2 is considered to remain unsound.
- 1.1.3 In 2013, the Landowners noted that an appropriate 'gap' between Oakley and Basingstoke to prevent coalescence could be maintained in a manner that would also not prejudice the objectives for the Manydown project during and after the Plan period. Additional flexibility in the policy wording was sought to accommodate infrastructure relating to allocations adjacent to strategic gaps. The landowners stated that in its current form the policy was unsound because it could hinder the delivery of the Borough's emerging housing allocations, which was internally inconsistent.
- 1.1.4 In 2014 the Landowners made a similar representation to those made in 2013. Whilst policy EM2 Strategic Gaps was supported as an approach, it was still considered that the policy wording was not clear with regards to whether or not infrastructure supporting the Manydown development would be permitted e.g. associated green infrastructure, roads or sewerage treatment works for early or later phases on the scheme.
- 1.1.5 Related to EM2, the Landowners highlighted that policy SS3.10 criterion (s) seeks to ensure that future phases of development at Manydown are not compromised by development during the plan period. The Strategic Gap's width was not considered to be commensurate to the purpose it serves. The Landowners stated that coalescence could be prevented with an amended boundary that allowed for the safeguarding of infrastructure provision and a pattern of development envisaged in policy SS3.10.
- 1.1.6 The landowners requested greater flexibility or clarification in policy SS3.10 (s) and EM2 so that they were internally consistent, and did not prejudice the objectives for Manydown both during and after the plan period.

### *LPA response*

- 1.1.7 In response to the representations submitted in 2014, the Local Planning Authority ("LPA") stated in their response (ID 700350/Comment 1394) that amendments to the extent of the Strategic Gap area and policy EM2 were not necessary as policy EM2 already included flexibility for development in gaps subject to satisfying policy EM2 criteria a) and b). The Landowner's representations were therefore not taken on board. The LPA stated that the strategic gaps are the areas in the borough where there is greatest risk of coalescence and that their approach was consistent with paragraph 17 (bullet point 1) of the NPPF as it provides a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency.

- 1.1.8 The LPA's Strategic Gaps Topic Paper (October, 2014) to support the Submission Local Plan concludes that *"strategic gaps will contribute to the achievement of sustainable development by preventing the areas in the borough where there is greatest risk of coalescence. The strategic gap policies can help safeguard local distinctiveness."* It goes on further to state that *"the policy is flexible and does allow for development to take place within the defined strategic gaps subject to compliance with policy criteria a) to c)."*

*Suggestions for change to policy EM2:*

- 1.1.9 As suggested in previous representations (2013 and 2014), reference should be made to infrastructure requirements being acceptable uses within strategic gaps, to support other policies within the draft Plan.
- 1.1.10 In the second part of policy EM2, under 'Development in gaps will only be permitted where', insert an additional criterion after (c) to read as follows:
- "d) it is associated with the infrastructure requirements of strategic sites and the Manydown site and where such infrastructure development through mitigation measures where it preserves or enhances the existing landscape and green infrastructure assets through mitigation measures"*
- 1.1.11 In addition, modifications should be made to SS3.10 criterion (s) to make it explicit that 'off site' can encompass areas within the Basingstoke-Oakley strategic gap (where it complies with the suggested modification above).

*Justification*

- 1.1.12 The Landowners maintain that EM2 criteria a) and b) do not offer explicit flexibility, particularly in relation to the wider infrastructure that may be required to support the development of the first phase of Manydown. Furthermore, reference should be made to infrastructure requirements being acceptable uses within strategic gaps, particularly to support other policies in the plan, i.e. SS3.10.
- 1.1.13 The Landowners support the principle and concept of Strategic Gaps, recognising their importance to preventing coalescence of settlements. However, the current wording of the policy is not effective. The policy needs to include a criteria that references infrastructure requirements as being acceptable uses within strategic gaps, therefore supporting other policies in the plan, and not jeopardising the delivery of strategic allocations, including policy SS3.10 Manydown.
- 1.1.14 Additional flexibility in policy EM2 is required to enable the necessary infrastructure to be in place to support the development of Manydown. This will be justified by ensuring, through the suggested modification to EM2 above, subject to there being no implications on other infrastructure such as green infrastructure and transport.
- 1.1.15 The Waste Water And Sewerage Strategy prepared by WSP Ltd on behalf of the Landowners is attached in Appendix 1. The study assesses potential locations for infrastructure based on a review of topography and masterplanning showing the proposed land parcels for development. It identifies a number of possible locations that may be required for waste water and sewerage infrastructure. This study along with the Manydown Masterplan has identified the following infrastructure requirements for Manydown:
- Safeguarding land for an onsite Wastewater Treatment Works that could be used to process sewerage generated by development constructed after 2021; and
  - Safeguarding land for foul pumping stations situated at the low points within each drainage catchment to overcome constraints in topography.
- 1.1.16 The Landowners have identified three principal options for treating wastewater from the site, which could be used in isolation or combination:

- Land reserved for an on-site wastewater treatment works. This would indicatively be located to the west of the developable area in land proposed as Strategic Gap by emerging Local Plan Policy EM2, selected due to the topography and requirement for a *cordon sanitaire* around the works. The Landowners have raised a separate objection to policy EM2, raising concerns that it would restrict delivery of wider infrastructure that would support the development of the first phase of Manydown. The LPA consider that this would not be the case and that this policy is sufficiently flexible;
- The provision of on-site foul pumping stations to convey discharge to the Basingstoke STW or;
- The provision of on-site foul pumping stations to convey a proportion of the discharge to the Ivy Down Lane STW (north-west of Oakley).

1.1.17 The LPA's Water Cycle Study, Statement of Common Ground (SoCG) with the Environment Agency and Thames Water, and the representations submitted by the Environment Agency and Thames Water in response to the emerging plan demonstrate that there is sufficient capacity at the Basingstoke Sewage Treatment Works to accommodate all the development proposed in the plan period, including the 3,400 dwellings at Manydown.

1.1.18 In the Statement of Common Ground (SoCG) between the Landowners and the LPA, it is common ground that sewerage capacity and infrastructure does not provide a constraint to development. This is contingent on the availability of land to provide for waste water and sewerage infrastructure.

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