

BDBC Local Plan 2011-2029
Examination Statement
Issue 4: Other Housing Matters
Middleton & Portway Estates

September 2015

5. Distribution of housing development

Spatial Strategy & Housing Need

5.1 Is the Plan's distribution of overall housing development, including indicative levels of housing growth in the Borough, as set out in policy SS3, the Council's Document PS/02/14 and the 2014 Strategic Housing Land Availability Assessment (SHLAA) (HO4), justified and at the right level of detail for the Plan?

What part of the LP is unsound?

- 1.1 Our client Middleton & Portway Estate considers the aspects of the plan relating to the overall distribution and levels of housing growth, within the larger, rural settlements¹ are unsound, namely that of Bramley, Kingsclere, Oakley, Overton and Whitchurch.

Which soundness criterion does it fail?

- 1.2 The Local Plan (LP) as drafted has not been positively prepared and the proposed distribution of housing growth on greenfield sites focused around the larger settlements within the Borough, with a relatively small proportion directed to the larger rural villages. The proposed distribution of overall housing development means that it will not be effective in rural housing needs, particularly in those settlements identified for the delivery of housing allocations through neighbourhood plans (Policy SS5). It is contended the strategy is unbalanced by virtue of the significant proportion of growth directed towards major settlements, and therefore a reduced ability to maintain and enhance the vitality of communities within the rural areas of the borough.

Why it fails?

- 1.3 Our representations to the Proposed Main Modifications to the Submission Local Plan (June 2015) contended that alternative housing distribution options should be explored through the Neighbourhood Planning process. Specifically, we wish to express concern in relation to the absence of the investigation of an alternative option to deliver an increased proportion of housing growth or allocations within settlements listed in Policy SS5. Instead, it appears that the Council has not sought to investigate all reasonable alternatives, and reverted to its preferred strategy to focus growth around Basingstoke Town without having re-examined other reasonable options to distribute development to other settlements in the Borough.
- 1.4 Though it is acknowledged that a number of town and parish councils have made significant progress on the preparation of neighbourhood plans based on the number of homes currently identified by draft Policy SS5: Neighbourhood Planning, it should not be to the detriment of meeting objectively assessed housing needs, nor the overarching housing distribution for the borough.
- 1.5 Whilst the overall notion for communities to develop a shared vision for their neighbourhood is supported, to place any weight on the proposed housing distribution in

¹ Identified for the delivery of housing through Neighbourhood Planning (Policy SS5).

advance of any detailed scrutiny as through the Examination-in-Public would potentially pre-determine the strategy and prejudice the quality of the plan preparation. The Framework is clear that neighbourhood plans should be in general conformity with strategic elements, with communities empowered to shape and direct sustainable development outside of these strategic elements (paragraph 185).

- 1.6 Given the take up of a number of town/parish councils in the borough, there is clearly an appetite for the progression of Neighbourhood Plans from local communities in the borough. As such, there is a heightened importance to ensure the spatial strategy underpinning the Local Plan is capable of endurance for the entirety of the plan period, and can respond flexibly to changing circumstances, including market conditions (NPPF paragraphs 50, 153).

How the LP can be made sound and precise change and/or wording that you are seeking

- 1.7 In addition to the increased Borough-wide housing requirement, the plan needs to include a proportional increase in the settlements identified for housing growth through neighbourhood plans.

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?

What part of the LP is unsound?

- 1.8 Policy SS5 and paragraph 4.53 of the LP supporting text.

Which soundness criterion does it fail?

- 1.9 See paragraph 1.2.

Why it fails?

- 1.10 Whilst our client has concerns in relation to any evidence of investigation for the larger rural settlements to accommodate increased levels of housing growth to be delivered through the neighbourhood planning process, it is considered that the wording 'approximately' relating to targets for settlements listed in SS5 is not sufficiently aligned with the Framework's objectives to 'significantly boost housing supply' or meet 'objectively assessed needs'. In its current form, it is not worded positively and implies a potential cap to the identified housing figure is to further growth within the larger, rural sustainable settlements of the Borough identified by Policy SS5.

- 1.11 Indeed, the Council recognise that "*it is possible that some neighbourhood plans may include policies that will ultimately deliver higher housing numbers than the number in Policy SS5*"² but this does not appear to have been reflected in the drafted policy wording. Accordingly, additional flexibility to support housing growth over and above the

² Paragraph 4.29 of the Council's Document PS/02/14

housing numbers currently identified by Policy SS5 is required, and positive wording should be incorporated.

- 1.12 In terms of the level of guidance provided by the policy, we do not consider it to be adequate for parish and town councils to simply identify 'opportunities' to deliver the identified levels of housing growth. In the interests of ensuring that the LP and neighbourhood plan(s) are effective, allocated sites should at least meet the 'developable' tests prescribed by footnote 12 of the Guidance to ensure that such sites are available (even if they are not deliverable in the first five years).
- 1.13 We do however, support the principle to ensure that the housing requirement is met through the DPD should no opportunities be identified by 2017. However, site allocations should however, be demonstrated to be suitable, and the most appropriate option(s) having regard to reasonable alternatives.

How the LP can be made sound and precise change and/or wording that you are seeking

- 1.14 The policy wording of Policy SS5 should be re-phrased to make reference to the housing requirements for settlements as 'minimums' or 'at least' in the interests of being positively prepared, and seeking to meet objectively assessed needs.
- 1.15 We would also welcome the certainty of additional guidance relating to the local authority's identification of opportunity sites should no suitable opportunities be identified for growth at a neighbourhood level.

Turley Office
6th Floor North
2 Charlotte Place
Southampton
SO14 0TB

T 023 8072 4888

Turley
Planning