

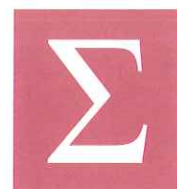
**BASINGSTOKE AND DEANE LOCAL PLAN
EXAMINATION**

ISSUE 4

**OTHER HOUSING MATTERS
13/14 OCTOBER 2015**

**REPRESENTATIONS ON BEHALF OF RYDON
HOMES LTD**

SEPTEMBER 2015



Inspector's Questions

Distribution of Housing Development

- 5.1 No. Rydon are of the view that the overall quantum of housing provision does not fully meet OAHN and this issue is addressed under Issue 3. They are further concerned that there is too great a concentration on Basingstoke town and large Greenfield sites on its periphery. Whilst this is the correct focus, the degree of dispersal across the District, particularly to the villages, should be greater. Villages on main transport routes can be as accessible to main services as peripheral urban areas in terms of journey times and access to buses or trains. Most importantly limited development in villages helps to maintain local services, supports the rural economy and assists in preventing rural decline. Government policy in NPPF and recent Ministerial Statements acknowledge this.
- 5.2 It would be helpful for strategic allocations to be shown indicatively on the Key Diagram.
- 5.3 It would be helpful to have more detailed plans of the SS3 Greenfield allocation sites to confirm their extent and composition.

Deliverability of Housing

- 6.1 Rydon have concerns about the deliverability of housing provision in general terms. It is for the promoters of large development sites to confirm or raise issues about viability but, from an external view, the infrastructure provision required and extensive detailed criteria to be fulfilled, appear extremely demanding and likely to lead to delays and pressure on delivery of the full 40% affordable housing. There is also concern that the Council are placing too great reliance upon the delivery of longstanding commitments from past allocations and permissions that have, for various site specific reasons, failed to come forward to deliver housing promptly in the past. Such sites should be carefully examined to identify constraints and to establish the degree of certainty and timing for the lifting of constraints. Sites that have not come forward promptly in the past should be taken out of consideration unless a change of circumstances can be demonstrated. It is not considered that the Council have adopted such a rigorous approach and therefore the existing unimplemented allocations and opportunity sites give an exaggerated view of the likely future delivery rates. As far as small windfalls are concerned the average of 52 dpa over the past 10 years (garden land removed) does not justify an assumption of a 50 dpa continuation into the future. There should be a greater discount to reflect the limited nature of such sites and the increasing importance of retaining small employment sites. The contribution of Permitted Development change of use is also an unreliable element within the longer term covered by the Plan Period.

6.2 As a general point there is not sufficient variety in the location of housing and the proposed strategic allocations are focused heavily on Basingstoke Town. Additional housing is required and there is therefore an opportunity for this to be more dispersed to other settlements, including the villages. This can assist to achieve the objective set out at Paragraph 28 of the Framework which aims, inter alia, to promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship. Rydon are promoting a small development of less than 20 dwellings at Sherborne St John and are able to offer to provide a new community shop to the Parish Council to replace the only shop in the village and which recently closed. This type of co-operative development can be achieved to the benefit of other villages in similar fashion, whether it be in relation to a shop or other important local facilities that can be directly provided or renewed in conjunction with limited new development. The general issue of housing mix should therefore include a mix of type of location and scale of developments which allow much greater choice away from large neighbourhood expansions to Basingstoke.

In terms of Policy CN3 this is not prescriptive in its wording but may be in its interpretation. There is nothing in the policy that allows for the mix of market housing to respond to market demand, which would be the expertise of housebuilders and local estate agents rather than something that should be imposed or adjudicated upon by less expert planners. Strategic Sites must also be allowed to meet wider demand and not be restricted to "local requirements" as interpreted by planning and housing officers of the Council. It is appropriate for Council housing officers to prescribe the local requirement of housing mix for social housing but not to extrapolate this to market housing. The reference in the policy should therefore be to market demand across the HMA with a specific reference to the findings of the nature of market demand. Rydon are critical of Policy CN3 to the extent that it seeks to prescribe price and tenure. There is also little point in this policy seeking to achieve compatibility with the established character and density of the neighbourhood when such objectives are secured by standard development management policies and do not require repetition in a housing mix policy. It is a reasonable requirement for housebuilders to explain and justify their proposed housing mix, particularly by reference to the SHMA which should be reflective of the housebuilders perception of the market in any event. Policy CN3 should therefore be modified to:

- remove reference to price – which will follow type and size in any event.
- remove reference to local requirements because the development should be serving the HMA as a whole.
- remove reference to established character and density because these are not housing mix criteria and are secured by other development management policies.

- Include reference to justification based on the SHMA requirements and an explanation, supported by local expertise, of the perceived mix of housing that is required by the market of prospective purchasers for that site.

Optimising the delivery of housing to meet market demand means that housebuilders should have the least possible constraints upon their ability to meet the demands that they consider to be the strongest. As currently worded, the policy allows non-expert interference to the potential detriment of maximizing the delivery of housing to meet market demand.

Landscape and other constraints on development

7.1 Rydon support the concept of strategic gaps in principle, particularly to protect the individuality and character of settlements that risk being subsumed by the significant outward expansion of the town of Basingstoke. However the boundaries of the strategic gap need to be carefully considered to ensure that the designation is not too widespread and covering areas that make no meaningful contribution to the purpose of the strategic gap. A case in point is the strategic gap between Basingstoke and Sherborne St John which, as currently proposed, wraps around the western side of the village and extends right up to the existing settlement boundary. This allows no scope for the village to expand in what is probably its most logical and suitable direction. The boundary should be drawn back to protect the sensitive and meaningful gap but not be too widespread to the extent that it loses logic and meaning. This is particularly the case where, as at Sherborne St John, it potentially conflicts with the most suitable areas for limited outward expansion of the village where there is no actual issue of any material or perceived coalescence. The attached plan identifies with red edging the area where the current proposed designation should be drawn back so as not to conflict with potential future development options.

7.2, 7.3, 8 & 9 – Rydon have no position on these questions.

Neighbourhood Plans

10. Rydon do not consider that the Submission Plan provides adequate guidance or importance to the contribution that can be made by sites at villages towards increasing the choice of housing location, providing for local housing need in rural areas and supporting the vitality of rural communities and the local services that they depend upon. Policy SS5 is too weak and gives little guidance to Parish Councils in the context of strategic planning. The housing figures identified for the 5 larger villages are helpful but not sufficiently justified. These villages are capable of supporting more housing and should do so, particularly if local housing need for affordable housing is going to be addressed in a meaningful fashion. Similarly the proposed contribution from the remaining villages of 150 dwellings is not representative of the level

of new housing that they can accommodate and need to achieve in order to provide affordable housing to meet local rural housing need through cross-subsidy. The 150 dwellings only potentially provide a maximum of 60 affordable dwellings spread across all the remaining villages in the Borough. This figure will be even smaller if the majority of new housing sites are small and below the threshold where affordable houses are required to be provided. It is not good planning to leave this entirely to local initiative outside the remit of the Local Plan. The Plan needs a stronger evidence base in terms of identifying the level of rural affordable housing and the amount of development that is required to deliver it. It should not be assumed that additional housing will necessarily destroy village character. Most villages are capable of supporting some new development commensurate with retaining their general identity and character and the Local Plan should take a lead in encouraging and leading aspirations to tackle the problems of rural decline. It is not enough to provide an unsubstantiated and inadequate target figure and then leave local groups to find their way as a separate exercise outwith the Local Plan. The proposals to monitor the situation, give general support and hinting at addressing shortfalls through the DPD process are tenuous, languorous and likely to be ineffective. A far more pro-active and inclusive policy is required, encompassing all the villages and encouraging aspirational development to the long term benefit of the village and the rural community as a whole. This would better reflect Government policy and encourage positive and effective Neighbourhood planning than the current proposed policy of simply leaving villages to their own devices. The plan needs to improve its evidence base by:-

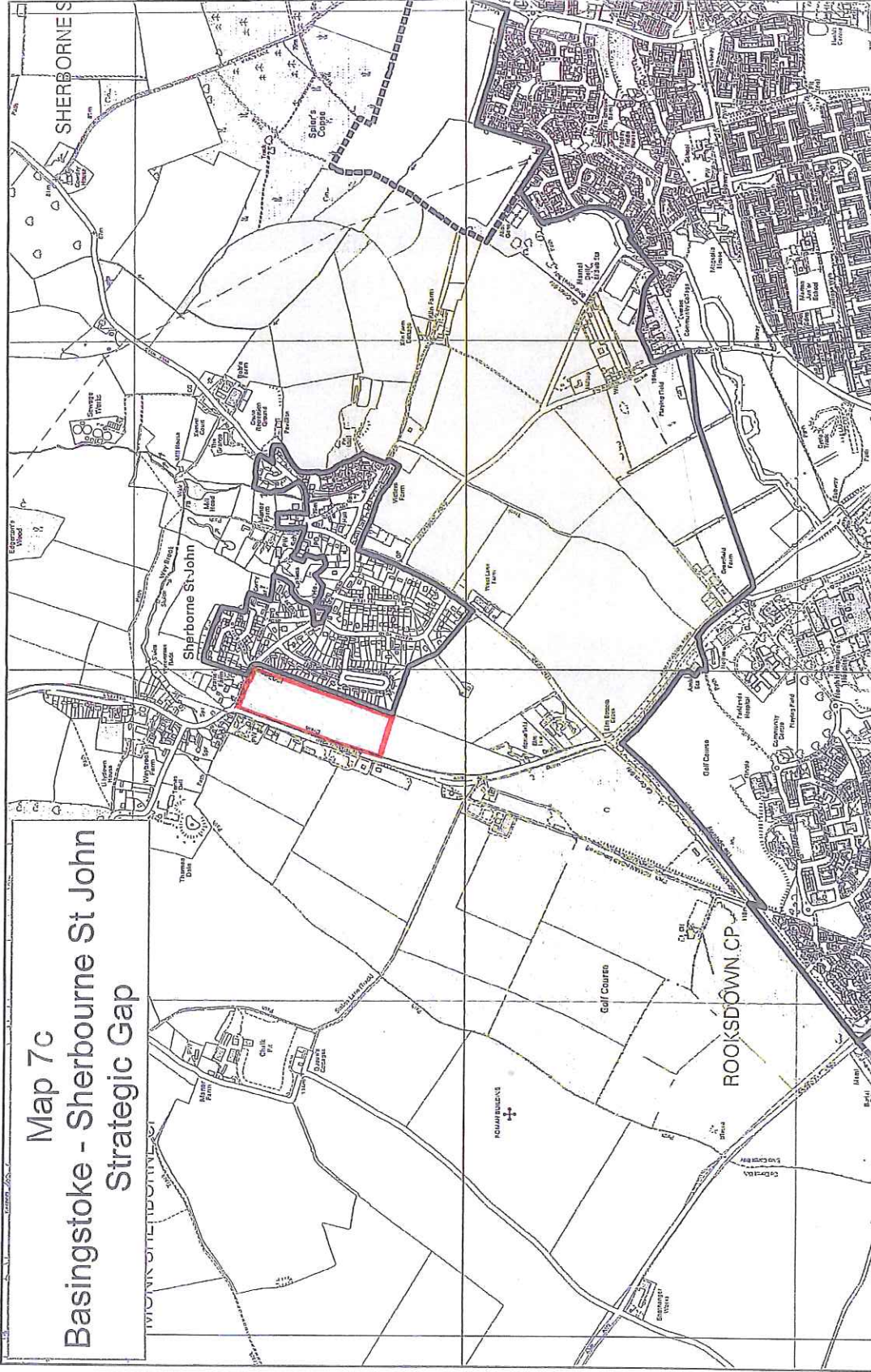
- surveying the villages in terms of their facilities, needs, constraints and opportunities.
- identifying a considered and realistic capacity or target for development on a scale that maintains local character and identity but provides an objective development target for each village to guide the preparation of Neighbourhood Plans.
- providing a settlement hierarchy.
- introducing a DPD to operate in those settlements that have not opted to prepare a Neighbourhood Plan for whatever reason. The opportunity to do so has been available for a sufficient period of time to now identify those communities that have no intention or resources to produce a Neighbourhood Plan. A policy needs to be put in place now to address those settlements where Neighbourhood plans are not being prepared and are unlikely to do so.

Policy SST is disappointingly bland and lacking in pro-active guidance, encouragement and penalties to deliver an approach of vitality to the rural areas. These are capable of delivering significantly more housing numbers which are required not only to contribute to meeting OAHN in the HMA but,





more importantly to meet the housing needs of rural areas, provide more choice in location and lifestyle and to maintain and enhance the vitality of villages and the rural economy as a whole.

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Map 7c Basingstoke - Sherbourne St John Strategic Gap



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- Key
-  Existing Settlement Policy Boundary
 -  Proposed change to Settlement Policy Boundary
 -  Proposed Strategic Gap
 -  Proposed additional area to be included in Strategic Gap