

From: Gary Rolfe
Sent: 20 November 2014 11:05
To: Katharine Makant
Subject: Basingstoke Local Plan Examination - Exploratory Meeting
Importance: High

Dear Katharine,

Thank you for your letter of 23rd October.

We share many of the concerns highlighted by the Inspector in the issues identified to in his letter to the Council. We have already expressed our wish to participate in the EIP, and also confirm our particular interest in the following aspects of points raised for the Exploratory Meeting and confirm that representatives of our group would be keen to attend the meeting and participate/speak on these points;

Point 1. Sustainable Development - 1.1 The robustness of the Sustainability Appraisal.

We comment on two points in our submissions;

a). The robustness of the key figures.

The plan gives a figure of 2,685 homes to be built on brownfield sites, with this figure being pulled from the SHLAA. There appears to be no testing of the figure and assumptions in the SHLAA itself.

The borough has achieved a brownfield build of around 550 homes per year for the past eight years and is on track for this to continue in the first five years of the plan giving a solid and constant yield. The SHLAA predicts the brownfield sites to drop down to just 71 homes per year for the last 6 years of the plan. This is unquestioned.

We believe the SHLAA grossly underestimates the brownfield capacity, in that it only includes brownfield sites that are available and recognised at the time of the assessment and also does not adequately give consideration to the historic brownfield build rate. PPG only requires sites to be specified for five years ahead. The Council has wrongly applied this requirement to the whole plan period with all the brownfield sites listed and no allowance for any more coming forward in the next 15 years resulting in a massive under-estimate of the brownfield capacity by some 3764 homes in the SHLAA which is then carried into the plan.

This results in a radical shift in the policy on the location of new housing from the long standing and delivered 60% brownfield build that has been achieved throughout the current plan to a brownfield figure that will be less than 10% of the housing in the final period of the new plan. By following PPG correctly much of the proposed greenfield development would not be needed.

Before we debate the location of new development surely the Council should be asked to substantiate the figures and interpretation of PPG that has given rise to the dash for greenfield sites and the abandonment of the successful brownfield policy in the present plan against a backdrop of the latest PPG giving ever greater emphasis on sustainability.

b). Appraisal of Sites

The SA gives no consideration to the impact of Greenfield sites compared to Brownfield sites. The plan wrongly just has a fixed Brownfield number and ignores the ability of the council to increase the Brownfield capacity or range of sites by changes in local planning policy or how the Council itself manages and releases its own land stock. We accept that there are minor specific measures to encourage development in isolated areas but there is no consideration to the use of policy to generally encourage the re-use of land and the change in the environmental impact that such change would bring.

The Sustainability Appraisal is carried out late in the process on comparative greenfield sites and so does not assess the range of options available or consider the avoidance of Greenfield development. Sustainability action should lead policy and not just be a consideration following policy as is the case in this plan.

Point 6. Level of detail and presentation- 6.2. Regeneration.

We share the concerns raised with regard the level of detail in the plan and have also used policy SS8 Basing View as an example of our concern.

The policy draws on reports showing many unused sites, a vast amount of run-down and vacant office space. It then proposes that this huge problem (At the time of our submission we calculated that 50% of the area of Basing View was either vacant land or empty run-down office space) is to be solved by a very modest need for some good quality new office space and a few homes.

We believe if the required details are provided to illustrate the proposed regeneration that the newbuild/refurbished office space built to meet the estimated demand will not be enough to “save” the run-down employment areas. The opportunity provided by the unused and run down spaces is not seized. This is however assessed from our own review due to the lack of detail in the policy.

The success of any new development will rely on a radical transformation to clear the old, dilapidated and redundant. It will fail if the run-down and tired look of the area is allowed to remain. This needs to be shown in the plan. We also need it to be demonstrated that the potential of the area will be fully utilised both in the provision of needed employment space and also in the continuation of successful policy in the rejuvenation and re-use of office space as housing.

The policy, as with others in the plan, is just a vague statement of intention and does not demonstrate a strategy to fully address the issues and utilise the full potential of the site.

We have raised a number of other issues that we hope will be explored in due course at the EIP but hope the above summary of our concerns gives some feedback in relation to the particular issues being scrutinised at the Exploratory Meeting.

We confirm a representative from our group will be available if called to the Exploratory Meeting.

Yours sincerely

Gary Rolfe

Save Oakley Village Action Group.