

Further comments on the pre-submission document.

The following highlights those aspects of the document that contribute to the unsound nature of the proposed plan.

Chapter 2 - Vision and objectives.

Paragraphs 2.4 and 2.5 talks about “enjoying an excellent quality of life” and “enriching the character and vitality of our villages and outstanding countryside”.

The plans for Bramley Parish propose 1010 new dwellings on green field sites this is a reduction in the rural character of the area with a loss of over 60ha of productive farm land and open views. Poor infrastructure already stretched to capacity with very limited practical opportunities to make significant changes/improvement will not lead to an improving quality of life for residents. Following recent development there is a significant number of residents isolated not only by circumstance but also location. Local employment opportunities, i.e. those not incurring commuting costs, are minimal, with many empty industrial units, a product of earlier large scale development remaining empty.

Paragraph 2.8 Objectives. Sub paragraph (M) talks about reducing the risk of pollution in the waterways.

Yet chapter 4 - Delivery of the Strategy contradicts the delivery of this objective.

4.10 The paragraph states that sewage treatment is

“currently failing to meet ‘good’ status under the Water Framework Directive”

and admits that

“there is no way of preventing this increase which is potentially damaging to the biodiversity of the river”.

This is an astonishing admission; there has been no serious attempt to address this problem, with no published plans to alleviate the situation. We are in effect being told that the 13464 houses in the Plan will be built *whatever the effect on the river Loddon*. This cannot be justified, nor is it consistent with National Policy. This is also contradicts Policy EM6, Water Quality.

Chapter 3 - The Spatial Strategy

Paragraph 3.2 states “the local Plan will direct new development to previously developed sites first and encourage the regeneration of neighbourhoods whilst delivering new and sustainable communities around the borough’s main settlement.”

It is exactly this strategy that has resulted in the unsustainable infrastructure and quality of life in Bramley Parish and in particular the village environs. Should this strategy continue into the next plan period it will have the effect of joining the surrounding villages, no longer rural in nature, with Basingstoke thus creating another conurbation which will overtime leave little green open space north of the M3 motorway to the borders of adjoining counties.

Paragraph 3.7 states "New infrastructure will be provided to serve new development when it is required."

Also chapter 4 Delivery of the Strategy

Paragraph 4.4 states:

"The strategy includes the development of three major new housing areas to the west, east and south west of Basingstoke, each if [of] which will provide opportunities to create the high quality neighbourhoods of the future, supported by the necessary infrastructure to meet the needs to [of] existing and future residents."

The proposed plan speaks of mitigation but neither offers meaningful suggestions as to how mitigation will be achieved nor "necessary infrastructure" delivered. Without such proposals the Plan cannot be considered sound or justified.

Chapter 4 - Delivery of the strategy.

Paragraph 4.1 states "The housing figure [748 per annum] recognises the constraints on growth imposed by the existing infrastructure of the borough."

The housing figure as it relates to Bramley Parish and in particular the village environs takes no account of the constraints which are imposed by existing poor infrastructure nor the worsening effect that further development will bring to the area. The plan does not also adequately address the constraints imposed by the existing major road network throughout the Borough, in particular the A33 as it approaches the borders of Basingstoke and surrounding settlements.

Paragraph 4.4 states:

"General infrastructure constraints including education, the historic road infrastructure which leads to local congestion and sewerage treatment will be addressed, where possible, in the site specific policies and through the IDP"

As already noted, nowhere in this plan are there any meaningful suggestions for any infrastructure beyond such phrases as "measures to mitigate" or "Include provision of physical infrastructure". Without real specific proposals with indications of sources of funding the Plan cannot be considered sound or justified.

We do not believe that such infrastructural issues as sewage treatment and drainage would, or can be, addressed on a site specific basis. The very real concern is that whilst services are delivered to a

specific site as part of the build it is the significant adverse impact created when these are joined with wider network serving existing development that this plan fails to address.

Bramley

Paragraph 4.28

Bramley has expanded from a base of 520 dwellings in 1984 to 1662 in 2011 and the plan calls for a further 1010 units by 2023/4 (delivered 5 years before the end of the plan period). The population now stands at 4233 yet there are no new roads, still only a small surgery, a public house and a primary school expanded recently to meet existing needs.

Paragraph 4.29

This paragraph refers to Bramley's infrastructure, the implication being it is a reason to develop further. The reality, as stated elsewhere in this response is that this is stretched to capacity with the railway station and school attracting daily migration from surrounding settlements. The village is increasingly divided into two by the railway line's level crossing which brings traffic to a standstill for more than 50% of every day time hour. Rail traffic is planned to increase as this section of the "electric spine" is electrified creating further level crossing downtime due to both increased freight traffic and longer trains.

Paragraph 4.3

This paragraph refers to the availability of services within Bramley. As can be demonstrated these services are already stretched to the limit with the existing population. The plan offers no suggestions on or proposals as to how the services can be increased to meet new demands of development in the parish. Bramley's NDP application is for the whole parish not just the village, and whilst an allocation is preferable to a specific site it must be remembered that there are two specific sites allocated within the Parish related to policies SS 3.3 and SS 3.8. Please see specific response form for policy SS5 attached.

Policies.

Policy SS3 Greenfield Site Allocations

Bramley Parish Council considers this Policy to have flaws, making it unsound. The housing numbers defined in 4.11. Table 2 are based on data gathered in 2010 and 2011 with the sites selected from the SHLAA of 2010.

The sites brought forward for Site Selection in June 2013 had proposed yields matching the agreed numbers with little headroom (possibly only that generated by those areas included in policy SS5) therefore for there is very little choice. All the proposed sites had to be selected directly or via NDP allocations to make the agreed total of 13,464 dwellings, with 7,010 to come from green field site allocations.

With effectively no spare sites, the "selection" process was flawed and unsound as there was no actual selection as all green field sites had to be included to make the required total.

With no reserve sites the situation will become critical if any one of these green field sites is found to be not viable. This could have serious consequences, including “planning by appeal”. The only site with considerably potential for flexibility is Manydown , policy SS3.10.

Policies SS3.3, SS3.8 and SS5 have specific responses which are attached. Bramley has one brownfield site, the now derelict Royal British Legion land within the settlement boundary policy. It is requested that any development on this site (suggested 10 -20 units) be deductible from the NDP allocation of 200.

Policy maps for the pre-submission local plan.

Map 7d is misleading and must be amended. It does not show the “German Road estate”. Whilst it is appreciated that the policy is about settlement coalescence it is misleading to show the MOD camp as a strategic gap.

Comments on other policies within the pre-submission document.

Rather than complete individual response forms for each policy the following is a summary as many concerns are common to multiple policies.

Policies SS3.7 - Redlands and SS3.9 – East of Basingstoke both impact Bramley residents travelling to Basingstoke for employment, leisure and higher order services with the increased traffic volumes on the A33 being the primary cause for concern alongside loss of open green space. There are no specific infrastructure improvements planned to solve the consequential problems and the statements of mitigation have no substance. These developments along with the existing Sherfield Park site will turn the A33 into a residential corridor to Basingstoke rather than support the essential gap required by residents to maintain any residue of the rural aspect in this north east part of the borough.

SS3.10 – Manydown

The Parish council support residents in their request that this site be developed at a faster and greater rate and thus ease pressure on other areas of the borough. The land was purchased for development and to plan not to deliver homes and infrastructure before 2019 is unsound and inconsistent with the aggressive expansion being planned in other areas.

SS3.11 – Basingstoke Golf Course is not available for development unless members vote to sell. This renders this policy flawed. This is a site for 1000 homes. Where will they go if the land is not available?

Policy SS5 – Neighbourhood Planning

SS5 states that allocations would generally be *“in and around defined Settlement Policy Boundaries”* and would *“in general be in addition to small -scale infilling within defined Settlement Policy Boundaries”*

The policy must define *“small-scale”* and *“around”* in the context of the housing allocation.

This would provide clarity as to the number of homes required to be built in Bramley Parish under Policy SS6 (see below).

Policy SS6 - New housing in the countryside

Policy SS6 permits development outside of Settlement Policy Boundaries for a rural exception site for affordable housing. Could not policy CN2, rural exceptions for affordable housing, be employed to support Bramley's need for those 72 households on the housing register rather than building 200 homes to allow the 40% affordable/social housing ratio to support the need? This would provide local housing for local people in need whilst minimising the documented strains on Bramley's infrastructure.

Policy SS10 – Chineham Railway Station

There is no plan to deliver this facility and its presence in the plan is misleading.

Chapter 5 - Community needs.

See reference to Policy CN2 above.

Policy CN5 – Gypsies, travellers and travelling show people.

Bramley Parish has a recent history of unauthorised traveller camps and a recent retrospective planning application was refused for change of use from agricultural land to a traveller site with a fixed dwelling and several caravan pitches. Bramley Parish Council supports the view held by the majority of residents that the Parish is unsuitable for either temporary or permanent pitches and camp sites.

Policy CN5 - infrastructure

Much is said in our response regarding infrastructure provision and the inadequacies relative to existing demands. The necessity for major infrastructure improvement through capital projects is obvious and also detailed in the Infrastructure delivery plan document. However of the 83 million pounds of financing required only 14 million is identified. This policy is therefore flawed at this time. With respect to Bramley Parish it is hard to see how and where local infrastructure can be improved to even meet existing needs, as stated elsewhere in this response Bramley is constrained in its ability to make significant infrastructures changes thus making it unsuitable for further development. This overall plan fails to articulate how the significant infrastructure required to support 13464 more dwellings will be delivered and when.

Policy CN8 – transport

Traffic on the already overloaded A33 would increase far beyond its current capacity which is evidenced in the 2014-2019 transport assessment report.

All traffic from SS3.3 and SS3.8 will pass through residential and business areas, on roads never intended to cater for the likely levels of traffic volumes, onto the overloaded A33. All necessary

measures to alleviate these difficulties must be specified before allocation and must be in place **before** development,

There is no adequate road heading north in the borough except the A34. From Basingstoke urban area all three 'A' routes leading north, A339, A340 and A33 are single carriageway roads already at overcapacity. The A33 is an important route between the M3 and the M4 at Reading as well as a heavily used local route. The draft Plan as submitted would seriously restrict further upgrading of this important road if S3.7 and S3.9 are developed as suggested.

The A33 and A339 have previously been considered in need of upgrading.

It is noted that proposals are being considered to abandon the road link between Taylor's Farm and Chineham. The loss of this agreed link, for which construction has already been started, would have profound implications for the development of SS3.3, SS3.8, SS3.7 and SS3.9.

Chapter 7 – Economic development.

It is noted that a substantial part of justification for the proposed plan for the borough hinges on attracting new employers to accommodate the existing unemployed and a proportion of the anticipated new residents occupying the new developments. The positive statements are essentially based upon hopes and wishes and doing as much as possible to retain existing employers. We have already heard from P&I Scrutiny Committee's Chairman that employers close to SS3.3 and SS3.8 are actively looking for other premises outside of their current location in Chineham. We see empty industrial units, office facilities and retail units particularly in Festival Place. It is going to take the economy to make a significant turnaround to see the levels of growth expected and even then Basingstoke will be in competition with other towns and cities in the south east. There is little substance provided in support of the statements in the plan. Without this local growth the borough becomes even more of a feeder satellite for London and other centres with the associated increasing strain on an inadequate transport network.