

Land at Pembers Farm and North Bishopstoke and Fair Oak

Why it is believed to be in the Borough Council's interests to be seen to be advancing as much housing (and infrastructure), as early as possible, following the "direction of travel" of the Local Plan by Full Council and, how the consideration applies to application ref: O/15/77190, Pembers Farm

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1 Introduction

- 1.1 This document sets out, by reference to established parameters, why it is believed to be in the Council's interests to be able to demonstrate at an EIP that it is, within an "adopted" emerging framework, taking a proactive approach to addressing its housing shortfall and meeting its progressive housing targets.
- 1.2 It is deliberately brief as to what the "established parameters" are. If there is doubt as to any of them we will be pleased to provide full contextual reference.
- 1.3 It is proffered in a spirit of confidence and cooperation.

2 Executive summary

- 2.1 Central Government's position is very clear; it is determined "*to boost significantly*" the supply of housing.
- 2.2 The Council cannot demonstrate a 5 year supply of deliverable housing land.
- 2.3 It will be held to the Council's credit (in, for example resisting unwanted applications at appeal or at an EIP) if it is seen to have been as proactive as possible in addressing its housing supply shortfall.
- 2.4 If supply is not maintained from, inter alia, strategic sites, the Council's position (in face of "aggressive" applications) becomes **more**, not less vulnerable.
- 2.5 Once the iterative processes of masterplanning (MP), and Infrastructure Delivery Planning (IDP) have reached a **compatible** stage, it will be possible confidently to derive supply from sites which meet specific criteria.
- 2.6 It is a pre-requisite that development of each of the sites which qualify on these grounds **MUST** also be capable of contributing proportionately to the realisation of strategic infrastructure objectives.
- 2.7 Subject to these essential, safeguards, it is completely safe (in terms of contributing proportionately to the strategic objectives) and highly desirable in housing supply terms, to permit qualifying proposals whilst the IDP/MP are being progressively refined.
- 2.8 The principles set out above apply to the Pembers Farm development, which:
 - 2.8.1 is capable of operating as a coherent sub-community
 - 2.8.2 brings significant benefits
 - 2.8.3 secures 250 dwellings with guaranteed early delivery
 - 2.8.4 delivers a significant affordable housing component
- 2.9 If all delivery from strategic sites is withheld until a fully detailed IDP and MP is in place, no housing will be provided from the strategic area for many years.

- 2.10 Adopting that approach brings the wholly negative planning consequence of unnecessarily deferring delivery of housing which could safely be provided now.

3 The policy context

- 3.1 Central Government's position is very clear; it is determined "*to boost significantly*" the supply of housing.
- 3.2 At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and **decision taking**
- 3.3 For **decision taking** this means: where the development plan is absent, silent or relevant plans are out of date planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits
- 3.4 Central Government's determination is evidenced in countless appeal decisions, including locally.

4 EBC's existing position

- 4.1 The LDS is committed to a very tight timetable, which is vulnerable to slippage arising from external factors.
- 4.2 The Council has a significant housing supply backlog.
- 4.3 It cannot demonstrate a 5 year supply of deliverable housing land.
- 4.4 The extent to which it purports to do so is vulnerable to critical scrutiny.
- 4.5 It will be held to the Council's credit (in, for example resisting unwanted applications at appeal or at an EIP) if it is seen to have been as proactive as possible in addressing its housing supply shortfall.

5 The Emerging Local Plan, with particular reference to potential strategic allocations

- 5.1 If supply is not maintained from, inter alia, strategic sites, the Council's position (in face of "aggressive" applications) becomes **more**, not less vulnerable. (See 6. below)
- 5.2 Once the iterative processes of masterplanning (MP), and Infrastructure Delivery Planning (IDP) have reached a **compatible** stage, it will be possible confidently to derive supply from sites which meet the following criteria, i.e. that the sites:
 - 5.2.1 are physically capable (within the MP) of operating as coherent sub-communities which do not prejudice the development of the adjoining strategic land.

- 5.2.2 demonstrate a fully proportionate contribution to strategic infrastructure objectives
 - 5.2.3 mitigate their own, including interim impacts.
 - 5.3 This reflects the fact that both the LPP and MP are iterative processes; confirmation of their finer detail requires significant stakeholder involvement and will take time, during which all supply (from the strategic sites) cannot stand still.
 - 5.4 However, there are some, (easily identified), components of the MP which will inevitably (and desirably) operate as physically self-contained satellites. Their self-containment is
 - 5.4.1 inevitable, because of their physical characteristics, and
 - 5.4.2 desirable, because it adds to the organic character of the strategic development.
 - 5.5 It is an absolute pre-requisite that development of each of the sites which qualify on these grounds MUST also be capable of contributing proportionately to the realisation of the strategic infrastructure objectives. No development which cannot meet this test should be contemplated.
 - 5.6 Whilst this test generally becomes more complex as the MP and IDP are refined, some components of the overall infrastructure delivery take the form of improvements to the existing public estate which will eventually be required as adjuncts to the strategic scheme. Subject to audit, it is effective to provide these improvements at an early stage. This is particularly the case in respect of highways, but also relevant to permeability, provision of POS, AH etc. For instance, the strategic scheme requires work to the Mortimers Lane / Winchester Road junction. This junction already experiences stress and requiring early-delivery sites to deliver this (and other) improvements works will provide significant relief to these existing problems.
 - 5.7 Subject to these essential, safeguards, it is completely safe (in terms of contributing proportionately to the strategic objectives) and highly desirable in housing supply terms, to permit qualifying proposals whilst the IDP/MP are being progressively refined.
- 6 Whether permitting development of qualifying green field sites creates an undesirable precedent which would make it more difficult for the Council to resist aggressive applications on other green field sites.**
- 6.1 For the following reasons this is not believed to be the case.
 - 6.1.1 Planning applications are to be determined on their own merits, a compelling, one of which is the ability to demonstrate conformity with a policy of an emerging Local Plan, which assists in the provision of infrastructure of wider benefit.
 - 6.1.2 Overlaying the LDS with the timeframe within which other applications could be brought forward, it can be seen that the Plan will be at a well advanced stage by the time that the relevant planning permissions are granted.

- 6.1.3 It will be held more to the Council's credit that it is proactively encouraging development, in accordance with the strategic direction of the emerging plan, than if it seeks to justify deferring their delivery until it irons out every sophisticated issue which applies to more strategic components of the overall provision.
- 6.1.4 In the interim it will be beneficial to be able to explain to an Inspector that the Council is doing everything in its power to accelerate delivery from its strategic sites; that it is very likely that delivery will be quicker from components of the strategic site than isolated "aggressor" sites, and that to permit "aggressor" sites would not be justified on delivery grounds and would impede delivery of strategic infrastructure.

7 How these considerations relate to the Pembers Farm application

7.1 The principles set out above apply with force to the Pembers Farm application. It;

- is capable of operating as a coherent sub-community
- does not prejudice the development of adjoining land
- makes a proportionate contribution to infrastructure objectives, and
- mitigates its own impacts.

7.2 It brings significant benefits. It provides;

- 250 dwellings with guaranteed early delivery (equal to approx' 0.25years worth of supply in terms of the 5 year Housing Land Supply requirement)
- a significant affordable housing component
- large areas of desirable and high ecological value POS
- new off road pedestrian and cycle routes, accessible to existing residents
- much sought after improvements to the local highway network, again to the benefit of existing residents (e.g. the Mortimers Lane / Winchester Road junction)
- exhibits high quality development and landscaping
- delivers housing at an early stage of the Local Plan period as possible.

7.3 It is justified (in the context of the foregoing) in that it:

7.3.1 is substantially bounded by existing housing (SW), Mortimers Lane (SE), open space (NE) and Gore Copse (SW). (See plan attached).

- 7.3.2 has limited common boundaries with adjoining developable land. Where it does have contiguity, the proposal makes good allowance for future pedestrian, cycle and vehicular permeability.
- 7.3.3 is remote from (and therefore cannot interfere with) any conceivable route for the strategic / distributor route between Winchester Road and Mortimers Lane.
- 7.3.4 does not extend development further eastward to the north of Mortimers Lane than already exists (or is being built) to the south of Mortimers Lane. i.e. it does not extend the interim visual envelope of Fair Oak.
- 7.3.5 has buffers which are existing natural boundaries which will be required to be protected for their own sake when adjoining land is developed. Therefore, the buffers do not consume site area which might have been available for development if bought forward simultaneously with adjoining land.
- 7.4 The site successfully mitigates each of its individual impacts.
- 7.5 By objective audit, it fully meets its proportionate contribution to delivery of the strategic infrastructure objectives.
- 7.6 It imposes no threat whatsoever to the achievement of the strategic objective, and delivers housing at a beneficially early stage of the Plan process. There is no reason why it should not be permitted.

8 The consequence of adopting a contrary approach to delivery from the strategic sites

- 8.1 If all delivery is withheld until a fully detailed IDP and masterplan is in place, no housing will be provided from the strategic area for many years.
- 8.2 Adopting that approach brings the wholly negative planning consequence of unnecessarily deferring delivery of housing which could be provided now.
- 8.3 That deferral will render the Council vulnerable to the assertion that its strategic land will not contribute significantly to short to medium term supply and that more unplanned (i.e. non strategic) delivery should be permitted in the interim.
- 8.4 To the maximum degree possible, that assertion should be averted.

9 Conclusion

- 9.1 The ability of the strategic site to provide components of early delivery is a further significant factor in its favour.
- 9.2 Pembers Farm is seen, by objective analysis, to be one of these and its early and assured delivery should be welcomed.

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