

CALL IN APPLICATION

**LAND AT BOUNDARY HALL,
TADLEY**

**PLANNING PROOF OF
EVIDENCE**

PREPARED BY

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Douglas Charles Berner Bond will say:

I hold a Bachelor of Arts in Town and Country Planning and I am a Member of the Royal Town Planning Institute. I am a partner of Woolf Bond Planning LLP – Chartered Town Planning Consultants. I have been engaged in town planning work for the last 24 years as a private consultant acting for the Home Builders Federation, major house building and development companies. In addition, I have been instructed by various Public Bodies including Government Departments, statutory undertakers, District Councils and Parish Councils together with Resident Associations and individuals.

I have visited the appeal site and its surroundings and have examined the relevant plans and documents for the purpose of the Inquiry.

The evidence which I have prepared and provide for this inquiry (reference APP/H1705/V/10/2124548) in this proof of evidence, is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

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DOCUMENTS

Core planning documents

1. BOUNDARY HALL, TADLEY VOLUME 1 ENVIRONMENTAL STATEMENT, INCLUDING APPENDICES VOLUMES 2A AND 2B, JUNE 2010.
2. PLANNING APPLICATION PLANS, SUPPORTING DOCUMENTATION AND PLANNING OFFICERS REPORTS.
3. BASINGSTOKE AND DEANE LOCAL PLAN (ADOPTED JULY 2006).
4. SAVED POLICIES FROM THE BASINGSTOKE AND DEANE LOCAL PLAN – GOSE – 30th JUNE 2009.
5. BASINGSTOKE AND DEANE ANNUAL MONITORING REPORT (DECEMBER 2009).
6. SOUTH EAST PLAN (MAY 2009).
7. DESIGN AND SUSTAINABILITY SPD (SEPTEMBER 2008) (Relevant extracts only):

Overarching Introduction document;
Appendix 5 Construction Statement;
Appendix 6 Waste and recycling;
Appendix 7 Places to live:
8. AFFORDABLE HOUSING SPD (JULY 2007) (AS REPLACED BY PPS3).
9. HOUSING MIX AND LIFETIME MOBILITY STANDARDS SPD (JUNE 2007).
10. LANDSCAPE AND BIODIVERSITY SPD (JUNE 2009).
11. RESIDENTIAL PARKING STANDARDS (JULY 2008).
12. TADLEY DESIGN STATEMENT SPG (APRIL 2004).
13. BASINGSTOKE & DEANE EMPLOYMENT LAND REVIEW (JANUARY 2009).
14. SECTION 106 PLANNING OBLIGATIONS AND COMMUNITY INFRASTRUCTURE SPD (APRIL 2006).

15. BOUNDARY HALL SITE DEVELOPMENT BRIEF (1996).
16. DEVELOPMENT FRAMEWORK DOCUMENT: BOUNDARY HALL SITE, TADLEY (2004).
17. RAM BREWERY, WANDSWORTH INQUIRY INSPECTOR'S REPORT AND SECRETARY OF STATE'S DECISION LETTER REF: APP/H5960/V/09/2099671, 20995, 2099698 AND 0299572 DATED 30TH JUNE 2010.
18. BRIT OVAL INQUIRY INSPECTOR'S REPORT AND SECRETARY OF STATE'S DECISION LETTER (APP/N5660/V/081203001 DATED 8TH JUNE 2009).
19. ERECTION OF SCOUT'S DEN AT SOUTHDOWN PLAYING FIELDS, SOUTHDOWN ROAD, TADLEY APPLICATION NO. BDB71012, APPLICATION PLANS, PLANNING OFFICER'S REPORT AND DECISION NOTICE DATED 21ST SEPTEMBER 2009.
20. GOSE CALL IN LETTER DATED 4th MARCH 2010
21. BOROUGH HOUSING MARKET ASSESSMENT FOR CENTRAL HAMPSHIRE NEW FOREST (NOVEMBER 2007).
22. HOUSING MARKET ASSESSMENT UPDATE FOR CENTRAL HAMPSHIRE NEW FOREST (DECEMBER 2008).
23. 2008-2011 HOUSING STRATEGY FOR BASINGSTOKE AND DEANE BOROUGH COUNCIL.
24. BASINSTOKE AND DEANE BOROUGH RURAL HOUSING STUDY 2010.
25. EMAIL HEIKE WETZSTEIN, BASINGSTOKE AND DEANE BOROUGH COUNCIL REGARDING AFFORDABLE HOUSING COMPLETIONS IN THE TADLEY AREA SINCE 1997/1998 DATED 27TH APRIL 2010.
26. DLGC LETTER DATED 6TH JULY 2010 REGARDING THE REVOCATION OF SOUTH EAST PLAN.
27. PLANNING AND INFRASTRUCTURE OVERVIEW AND SCRUTINY COMMITTEE DATE 17TH DECEMBER 2009. – Annual Housing Land Position Report and Annual Monitoring Report.
28. GOSE LETTER TO BASINGSTOKE AND DEANE BOROUGH COUNCIL REGARDING 5-YEAR HOUSING LAND SUPPLY CALCULATION METHODOLOGY DATED 26TH APRIL 2010.

29. WORTING FARM PLANNING APPLICATION OFFICER'S REPORT (APPLICATION BDB71886) DATED 12TH MAY 2010 AND OFFICER UPDATE REPORT.
30. BASINGSTOKE AND DEANE BOROUGH COUNCIL ISSUES AND OPTIONS PAPER 2008.
31. BASINGSTOKE AND DEANE BOROUGH COUNCIL KEY THEMES PAPER 2010.

1. **INTRODUCTION**

- 1.1. This evidence addresses the town planning issues arising from the Secretary of State's Call-In letter dated 4th March 2010. The evidence addresses the following matters:
 - i. Site description.
 - ii. Proposed development.
 - iii. Relevant planning policy context.
 - iv. Planning history.
 - v. Application of Development Plan policy.
 - vi. Application of Circular 04/2000: Planning Controls for Hazardous Substances.
 - vii. Affordable housing
 - viii. Housing need.
 - ix. Meeting other housing policy objectives.
 - x. Precedent.
 - xi. Planning balance.
 - xii. Secretary of State Call-In matters.
- 1.2. The evidence establishes that the application site is suitable for the proposed development, representing a long standing aspiration of the Council to redevelop it following the MOD vacating the site and demolishing the Boundary Hall buildings in 1995.
- 1.3. The evidence establishes that the proposal is consistent with Development Plan policy. The proposal secures a number of benefits that are either exclusive to the site or Tadley, or the Borough as a whole, that represent additional material considerations in support of the application.
- 1.4. The evidence relies upon the findings of the applicant's witnesses in respect of Nuclear Siting Policy, emergency planning and demographics and the Statement of Common Ground with the Local Planning Authority.
- 1.5. The evidence concludes that the proposal is acceptable in its own right, complies with the Development Plan and secures a number of benefits.

- 1.6. The applicant's evidence suggests that the risks either do not arise or are not so great as to forego the merits and benefits that the scheme will bring to Tadley and the Borough.

- 1.7. Finally the evidence addresses the matters raised by the Secretary of State in his Call-In letter. The evidence concludes that the planning application should be approved.

2. **SITE DESCRIPTION**

- 2.1. The site location is shown on Plan DB1.
- 2.2. The site is located on the south-western side of the A340 Aldermaston Road, adjoining Almswood Road and existing housing to the west and commercial property to the south east. A line of trees is located adjacent to the southern boundary, beyond which are residential properties and commercial buildings
- 2.3. The application site was developed after World War Two to provide residential accommodation for workers at the Ministry of Defence facility (now the Atomic Weapons Establishment, AWE, Aldermaston, 200m north of the site formerly occupied by MoD residential). The former residential accommodation was extensive – see 1991 OS Map – ES appendix 11, Archaeological Desk Based Assessment, Figure 6. This accommodation was demolished in 1995. The site now comprises predominantly overgrown scrub with areas of hardstanding (associated with the former buildings), a single ditch, semi-mature and mature trees (particularly along the north-eastern, northern and southern boundaries) and two buildings. These comprise an electrical substation in the south western corner and a dilapidated 2 storey building of brick construction (the old cinema building) which is currently used by Tadley Scout Group in the south eastern part of the site.
- 2.4. The site has been left vacant and derelict since 1995. It represents a large area of land with little visual appeal and no functional use but well related to the existing residential neighbourhood of Tadley. There is no other site like this in Tadley. The site in its current undeveloped state detracts from the character of the area.

- 2.5. The previous buildings were demolished in 1995 in anticipation of the site being developed. The Council published a Development Brief in 1996 (Planning Core Document 15).
- 2.6. Existing transport infrastructure includes the A340 along the northern and eastern boundaries of the site. Several informal footpaths are located alongside the south-western boundary of the site and connect to a footpath on the southern boundary of the site which links to a Public Right of Way (Tadley 901). This Public Right of Way provides a link through to Holmwood Health Centre and Franklin Avenue to the south of the site. This is in a poor state and needs improvement in order to make the footpath more attractive and usable.
- 2.7. The AWE Aldermaston facility is located to the north of the A340, approximately 200m north of the site. Areas of woodland and agricultural land are located to the north-east of the site.
- 2.8. Residential dwellings exist along Almswood Road and to the west. Commercial properties exist to the south east. A line of trees are located adjacent to the southern boundary, beyond which are residential properties and commercial buildings. The south-western edge of the site is adjoined by Barclays Bank and two single storey building currently occupied by the Berkshire Army Cadet Force 12 Platoon Aldermaston also adjoin the site to the south-east.
- 2.9. The application site is situated within the defined settlement boundary of Tadley and is located on the south western side of Aldermaston Road (A340), adjoining Almswood Road and existing housing to the west and commercial property to the south east. The north eastern and northern boundaries of the application site form the edge of the settlement boundary and also form the boundary with the neighbouring Local Authority, West Berkshire District Council. The site has a total area of 2.78 hectares.

- 2.10. Bands of mature tree planting define the application site along the north eastern, northern and southern boundaries with the remainder of the site, including the adjoining Almswood Road frontage, generally defined by a mixture of chain link and high-level security fencing. A copse of trees occupies the north eastern tip of the site. The site is predominantly level with some differences in ground levels as a result of the remaining slabs from the original structures which were demolished in approximately 1995. The site does not adjoin any listed structures or buildings of architectural or historic merit and does not fall within a Conservation Area.
- 2.11. The south western edge of the site, along the Aldermaston Road frontage and immediately adjacent to the Scout Hut, is adjoined by Barclays Bank and a car parking area (outside the application site area). This comprises a modern two-storey brick-built commercial building with partially rendered elevations surmounted by a flat roof.
- 2.12. Adjoining the south eastern boundaries, accessed via the site from the Aldermaston Road frontage, are two single-storey buildings of timber construction currently occupied by The Berks Army Cadet Force 12 Platoon Aldermaston.
- 2.13. To the west of the site, fronting Almswood Road, are a group of two-storey, post-war, semi-detached and terraced houses, many of which have adjoining single-storey flat-roofed garages and are set back from the road behind open frontages laid out with lawns and driveways. The pairs of houses are of traditional construction with rendered elevations surmounted by tiled, pitched roofs.
- 2.14. Immediately adjoining the western boundary to the south west of the site is a group of two-storey, modern terraced dwellings of brick-built construction with low pitched tiled roofs. Elevations are clad with hanging tiles to the upper storey and are set back between

approximately 14-18 metres from the site boundary behind rear gardens.

- 2.15. The application site currently has two accesses off Aldermaston Road, one of which provides access for the car parking area adjacent to Barclays Bank. The second access is to the north east of the site off the A340 (Aldermaston Road). There is also a third access point off Almswood Road, but concrete bollards currently prevent vehicular access at this point.

- 2.14. The site lies approximately 450m north of Tadley town centre. A local centre is present within 150m of the south of the site and includes shops, takeaway food establishments, a citizens' advice bureau, health centre and a dentist. Sainsbury's supermarket and Tadley Library are located approximately 300 metres to the southeast of the site. The site is served by a bus stop on its north eastern boundary providing access to Basingstoke, Newbury and Reading. This provides a high frequency bus service to these centres. It represents the principal public transport route to and from Tadley.

3. **PROPOSED DEVELOPMENT**

3.1. The Proposed Development is to provide a mixed use scheme which makes efficient use of a currently under-utilised brownfield site, in accordance with the Local Authority's aspirations for the Site. The Proposed Development comprises:

- Provision of two new access roads off Almswood Road serving residential dwellings and improvement of the existing access point on Aldermaston Road leading to a new access road serving a commercial unit, 3 no apartment blocks as well as the existing car park and cadet's buildings that adjoin the application Site;
- Demolition of the existing hall, relocation of the existing sub-station;
- Redevelopment of adjoining land to provide approximately 945m² of commercial space in 3 storeys and a total of 115 dwellings, comprising 31no. 4 bed terraced and detached houses, 36 no. 3 bed terraced and detached houses, 36 no. two bed apartments and 12 no. 1 bed apartments, resulting in an average residential density of approximately 41.3 dwellings per hectare. Of the 115 units, 46 units will be affordable;
- Provision of a total of 129 parking spaces to houses and 54 parking spaces to apartments in a mixture of garage, integral and open spaces;
- Provision of a total of 12 undercroft parking spaces and 14 open spaces serving the commercial building; and
- Provision of new public open space, comprising an area of 1,600m, and a Local Equipped Area of Play (LEAP) covering 400m

3.2. The Proposed Development retains the existing mature tree planting along the north, north-east and southern site boundaries and will maintain and improve the existing pedestrian footpath along the southern boundary of the site. In addition, the Development would provide pedestrian links through the site connecting the Aldermaston

Road and Almswood Road frontages and leading to the existing footpath along the southern boundary.

- 3.3. The Proposed Development includes a 1600m² regular shaped kick about space together with a 400m LEAP both with appropriate buffer zones of 10m and 20m respectively. The Public Open Space will be set back from Aldermaston Road, behind existing mature trees, and will form a key feature of the layout. Natural surveillance of this area will be provided by the surrounding two-and-a-half storey terraced dwellings. The Public Open Space would be further defined by a new dwarf wall and railings towards the road and new tree and hedge planting within the site.
- 3.4. Additional open space along the Aldermaston Road frontage is planned which will be separated and screened from the road by the retained line of mature trees. This additional area will serve a dual purpose of providing extra informal open space and creating a soft landscape buffer/edge to the Development along its entire northern and eastern edge.
- 3.5. The right of way to the adjoining cadets' buildings would be retained and access to the adjoining car park neighbouring Barclays Bank would be provided. Provision for the access and turning of emergency and refuse vehicles within the Site has also been integrated within the scheme.
- 3.6. The Proposed Development would include 40% affordable housing (comprising 46 units in a mix of 1 and 2 bed flats and 3 and 4 bed houses) in compliance with current Local Plan Policy. The mix and distribution of affordable housing within the scheme has previously been discussed and agreed in principle with BDBC (SOCG, paragraph 7.22). The mix of dwelling be delivered will make a positive contribution to the range of available accommodation in the surrounding area, thus creating a diverse and sustainable community.

- 3.7. Discussions held with BDBC at the pre-application stage confirmed that a commercial element comprising approximately 10% of the total floor space within the Development would be acceptable (see SOCG, paragraph 7.5). The Council accept that the proposed commercial space will enhance the existing provision of commercial property in Tadley (SOCG, paragraph 7.7).
- 3.8. A pre-condition of redeveloping the Site is to either replace the existing Scout Hut within the Site or to facilitate its provision elsewhere in Tadley. The applicants intend to adopt the latter option and planning permission has been granted for a new Scout Hut (BDB/44729 in September 1999 and has subsequently been renewed in August 2004 and 2010) on land off Southdown Road, Tadley (Planning Core Document 19) Implementation of the Scout Hut consent and construction and completion of the new Scout Hut is to be carried out prior to demolition of the existing building within the Site. This is controlled in the Section 106 agreement (see SOCG).

Design

- 3.9. The proposed dwellings would be of traditional appearance in brick built construction with pitched tiled roofs, corbelled eaves and gable ends. Windows and doors would have a mixture of soldier coursed brick or stone headers and cills. A range of red and brown facing brickwork, consistent with surrounding residential developments would be contrasted with the selective use of render to enhance feature properties at key locations with the layout. Stone banding would be provided to key elevations complementing stone gable vent details and a mixture of flat and pitched roof dormer windows and gabled bays would add variety to the street scenes. The appearance of the houses would complement that of recent residential development in the vicinity at Kestrels Mead.
- 3.10. The palette of materials described above would continue to the apartment blocks where a more contemporary aesthetic would

complement the proposed commercial building. The symmetrical form of the three individual apartment blocks would be articulated by feature Juliette balconies surmounted with a pitched roof, enhancing the buildings as a focal point at the entrance to the site.

- 3.11. The three-storey commercial block would be in keeping with the existing housing and would utilise red brickwork at ground floor level contrasted with render to the upper storeys. The mass of the block would be further fragmented with the use of continuous glazing/panelling above cill height to the upper storey, providing a more contemporary appearance, complementing the apartment blocks and differentiating the building from the surrounding dwellings by providing a commercial character.
- 3.12. The Proposed Development will comply fully with the Building Regulations current at the time of construction and the affordable houses are likely to comply with either Level 3 or 4 of the Code for Sustainable Homes, depending on the timing of the implementation of the Code requirements.
- 3.13. An assessment has been undertaken of the available technologies to achieve 10% of the energy requirements of the Proposed Development from renewable technologies. Solar thermal has been selected for this Site and based on initial calculation it is anticipated that this technology will provide over 10% of the projected energy requirement. In addition, the following energy saving items will be included within the scheme to reduce energy consumption:
- Low energy internal lighting in line with the current building regulations;
 - Dual flush toilets to minimise water consumption for each dwelling; and
 - Increased building insulation in line with the Building Regulations current at the time of construction.

- 3.14 The application scheme has been agreed with planning officers during the course of the application determination period and supported by the council when determining the application (Planning Core Document 2).

4. **RELEVANT PLANNING POLICY CONTEXT**

- 4.1. This section provides a summary of the planning policies and guidance against which the planning application will be considered. It reviews the relevant National Planning Policy Guidance and policies contained within the Development Plan.
- 4.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 sets out a presumption that planning applications are to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 4.3. The development plan comprises:
- Saved Policies from the Basingstoke and Deane Borough Local Plan (adopted July 2006).

NATIONAL PLANNING POLICY

- 4.4. The national planning guidance that is of most relevance to the Proposed Development is contained in the following documents:

Planning Policy Statement 1 - Delivering Sustainable Development (2005) including Planning and Climate Change Supplement (2007)

- 4.5. The Government's planning priority is the delivery of sustainable development. Paragraphs 4-5 of PPS1 'Delivering Sustainable Development' require development to meet the following aims:
- To provide effective protection of the environment (natural and historic) and the quality and character of the countryside and existing communities;
 - To ensure high quality development through good and inclusive design and the prudent use of natural resources;
 - To ensure that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed

communities with good access to jobs and key services for all members of the community;

- To contribute to sustainable economic development; and
- To make suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life.

4.6. PPS1 (paragraph 23) also emphasises the need for sufficient good quality new homes with adequate levels of social housing in suitable locations that reduce the need to travel.

4.7. Design matters are also a key issue in delivering sustainable development. Paragraph 35 states that:

“High quality and inclusive design should be the aim of all those involved in the development process. Although visual appearance and the architecture of individual buildings are clearly factors in achieving these objectives, securing high quality and inclusive design goes far beyond aesthetic considerations. Good design should:

- **Address the connections between people and places by considering the needs of people to access jobs and key services;**
- **Be integrated into the existing urban form and the natural built environment;**
- **Be an integral part of the processes for ensuring successful, safe and inclusive villages, towns and cities;**
- **Create an environment where everyone can access and benefit from the full range of opportunities available to members of society; and**
- **Consider the direct and indirect impacts on the natural environment.”**

The proposed development is consistent with the aims and objectives of PPS1.

Planning Policy Statement 3 – Housing (2010)

- 4.8. PPS3 also emphasises that the planning system should deliver good quality and well designed housing that is built to a high standard. Developments should be in suitable locations, which offer a good range of community facilities with good access to jobs, key services and infrastructure (paragraph 10).
- 4.9. Family housing that takes account of children’s needs is particularly encouraged (paragraph 17), and housing design should be appropriate in its context and take opportunities to improve the quality and character of an area and the way that it functions (paragraph 16).
- 4.10. Developers should also be encouraged to bring forward sustainable and environmentally friendly new housing developments that respond to issues of climate change and comply with the Code for Sustainable Homes.
- 4.11. PPS3 confirms at paragraph 36 that:

“The priority for development should be previously developed land”

- 4.12. Paragraph 20 states that the key characteristic of a mixed community is the:

“Variety of housing, particularly in terms of tenure and price and a mix of different households such as families with children, single person households and older people”.

- 4.13. The Government is committed to providing high quality housing for people who are unable to access or afford market housing (paragraph 27).

- 4.14. Despite the revocation of RSS, paragraph 32 still requires that the level of housing provision should be determined taking a strategic, evidence-based approach that takes into account relevant local, sub-regional, regional and national policies and strategies achieved through widespread collaboration with stakeholders.
- 4.15. Using land efficiently remains a key consideration in planning for housing (paragraph 40). Paragraph 50 of PPS3 makes clear that the density of existing development should not dictate that of new housing by stifling change or requiring the replication of existing style or form. If done well, imaginative design and layout of new development can lead to a more efficient use of land without compromising the quality of the local environment.
- 4.16. Paragraph 69 states that LPAs in determining planning applications should have regard inter alia to the following:
- Achieving high quality housing;
- Ensuring a good mix of housing development, reflecting accommodation requirements;
 - The suitability of the site for housing, including its environment and sustainability; and
 - Use land effectively and efficiently.
- 4.17. Paragraph 70 notes that where Local Planning Authorities have an up-to-date five year supply of deliverable sites and applications come forward for sites that are allocated in the overall land supply, but which are not yet in the up-to-date five year supply, Local Planning Authorities will need to consider whether granting permission would undermine achievement of their policy objectives.
- 4.18. Paragraph 71 of the PPS identifies that where LPAs cannot demonstrate an up-to-date five year supply of deliverable sites, they should consider favourably planning applications for housing.

- 4.19. The application site is allocated for development in the Local Plan, it comprises previously developed land, consistent with the Annex B definitions, and in particular, the proposed development meets the assessment criteria at paragraph 69 of the PPS.
- 4.20. The application scheme is consistent with the policies and objectives of PPS3.

Planning Policy Guidance 13 – Transport (2001)

- 4.21. The objectives of PPG13 seek to integrate planning and transport at national, regional, strategic and local levels. The aims of the guidance are to (paragraph 4):
- Promote more sustainable transport choices;
 - Promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling; and
- 4.22. Furthermore paragraph 75-77 encourages LPAs to give greater priority to walking as it forms the most important mode of travel at local level. In determining planning applications LPAs should:
- Pay particular attention to design, location and access arrangements of new developments, to help promote walking as a prime means of access;
 - Promote high density, mixed use development in and around town centres; and
 - Promote wider pavements including the reallocation of road space to pedestrians and environmental improvements.
- 4.23. The application scheme accords with these principles

Planning Policy Guidance 17 – Planning for Open Space, Sport and Recreation (2002) and Assessing Needs and Opportunities: A Companion Guide to PPG17 (2002)

- 4.24. Paragraph 1.3 of the companion guide to PPG17 emphasises that the aims of the guidance are to deliver networks of accessible, high quality open spaces and sport and recreation facilities, which meet the needs

of residents and visitors, are fit for purpose, and are economically and environmentally sustainable.

- 4.25. With regards to identifying where to locate new areas of open space, sports and recreational facilities, paragraph 20 states that LPAs should promote accessibility by walking, cycling and public transport, avoid any significant loss of amenity to residents, neighbouring uses or biodiversity, improve the quality of the public realm through good design and add to and enhance the range and quality of existing uses. The space proposals on the site accord with these objectives.
- 4.26. At paragraph 23, the guidance states that LPAs should ensure that provision is made for local sports and recreation facilities (either through an increase in the number of facilities or through improvements to existing facilities) where planning permission is granted for new developments (especially housing).
- 4.27. The guidance states that rights of way are an important recreational facility which should be protected and enhanced by LPAs. LPAs should seek opportunities to provide better facilities for walkers, cyclists and horse-riders for example, by adding links to existing rights of way networks (paragraph 32). The application scheme layout allows for pedestrian permeability, whilst the scheme facilitates improvements to the local footpath network.

DEVELOPMENT PLAN POLICIES

- 4.28. The Basingstoke and Deane Borough Local Plan was adopted in July 2006 (Planning Core Document 3) and implements the policies and proposals of the earlier Hampshire Structure Plan for the period to 2011. Its policies are therefore unaffected by the revocation of the South East Plan RSS. It is only the 'saved' policies from the adopted Local Plan as set out in the Secretary of State's Direction letter dated 30 June 2009 that are to be used for development control purposes. The policies in the following paragraphs are all 'saved' policies.

Saved Policies from the Basingstoke & Deane Borough Local Plan

- 4.29. Policy D1 sets out the residential development requirements for the period 1996- 2011 (between 12,060 and 14,060 dwellings) and also notes that appropriate levels of employment, retail and community facilities will be encouraged. The SOCG (paragraph 7.57) confirms that the application site is needed to meet local housing requirements.
- 4.30. Local Plan Chapter 1 sets out the overall approach to the location and distribution of development within the Borough, identifying that the guiding principle for new development is that it should be in locations that minimise the need for people to travel and have least impact on the environment. This means that, along with Basingstoke Town, the most appropriate locations for development in the Borough are considered to be Tadley, Whitchurch and Overton, the latter two of which have railway stations, whilst development at Tadley can take advantage of existing levels of services. Paragraphs 1.10, 1.18 and Saved Local Plan Policy D2 highlight the objective of developing sustainable brownfield sites before greenfield sites. The application scheme is consistent with this overall approach to the location and distribution of housing development within the borough.
- 4.31. Policy D3 allocates sites for development in seeking to meet the strategic housing requirement during the plan period to 2011. The Boundary Hall site is allocated for mixed residential, open space and employment use, including for a minimum of 100 dwellings under part D3.17 of this saved policy.
- 4.32. Policy D3.17 states in full as follows:

“This 2.5 hectare brownfield site lies to the west of the A340 in Tadley. The site adjoins existing residential development on the north side of Tadley and comprises land formerly occupied by an MoD hostel (Boundary Hall), where all the buildings have now been demolished. A planning application for a Tesco foodstore on the site was withdrawn in 2002 before it could be considered at a public inquiry. It is

considered that the site would be suitable for a mixed residential development of a minimum of 100 dwellings, with associated open space and landscaping, together with employment uses. A development brief for the site was adopted in December 1996 which identified potential access for the site from Almswood Road. However, all aspects of the 1996 development brief will need to be re-examined through the preparation of a new development brief for the site.”

- 4.33. The sites allocated for development under Local Plan Policy D3 aim to maximise the level of development on brownfield sites first, followed by development on appropriate greenfield sites. The implementation of Policy D.3.17 – Boundary Hall, through the current planning application will achieve this sustainable objective.
- 4.34. Policy D5 provides a schedule of settlements, within which residential and other development contributing to social, economic and environmental well-being will be permitted. This schedule of settlements includes Tadley. The development of the application site is consistent with the Council's objectives for locating development in certain settlements.
- 4.35. Under the terms of Policy E1, proposals for new development will be considered against various design and environmental issues. The detailed aspects of the proposed development accord with the criteria of the policy.
- 4.36. Local Plan Chapter 4 sets out the approach to meeting social and community needs. This includes policies seeking the provision of affordable housing in development schemes, ensuring an appropriate dwelling mix and requirements for developers, where appropriate, to enter into a legal agreement to ensure the provision of appropriate supporting infrastructure to mitigate against the impact of development.
- 4.37. Policy C1 is concerned with the provision of infrastructure and community facilities.

- 4.38. Policy C2 of the Local Plan requires that affordable housing is provided as part of any development of:
- 15 dwellings or 0.5 hectares within settlements with a population of at least 3,000 outside Basingstoke town; and
- 4.39. The settlement of Tadley falls within this category of settlements outside Basingstoke town with a population of at least 3,000 to which the 15 dwellings or 0.5 hectare threshold applies.
- 4.40 Local Plan Policy C2 confirms that the Council will negotiate the provision of an element of affordable housing on all housing sites above the identified threshold taking into account the specific circumstances of each site. Policy C2 establishes that 40% of the total dwellings on a site should be provided as affordable housing. This target has been explored and agreed through the Local Plan process. The application scheme provides 46 No. units as affordable, 40% of the total residential development.
- 4.41 In order to create mixed communities, Policy C3 requires, as part of new housing development schemes, a mix of dwellings, including a substantial proportion of 1 and 2 bedroom dwellings. The policy further adds that planning permission for residential development will only be permitted provided that between 30% and 50% of market dwellings provided on site are small units (1 and 2 bedrooms). The proposed dwelling mix accords with this Policy in order to create a balanced, mixed and sustainable residential community.
- 4.42. Local Plan Policy C8 protects essential local services and facilities. These need to be either retained or adequate alternative local provision made.
- 4.43. Local Plan Policy C9 requires adequate open spaces through appropriate on site provision or contributions for provision off site.

- 4.44. As to accessibility and infrastructure considerations, separate policies deal with the levels of required car parking provision, approaches to seeking to enhance sustainability and the provision of alternative travel modes to that of the private car.
- 4.45. Objective 2 from the Basingstoke and Deane Annual Monitoring Report (AMR) (Core Document 5) monitors housing delivery against the then target that at least 60% of all new development across the now revoked South East should be on previously developed land. The local target, as set out in the Local Plan, is for 40% of all new homes within the Borough to be accommodated on previously developed land.
- 4.46. The application site comprises previously developed land. Following the removal of residential gardens from the previously developed land definition in PPS3 (2010), the need increases to redevelop the application site in order to meet the Council's target which otherwise is reliant on Greenfield and private garden land.

OTHER MATERIAL CONSIDERATIONS

- 4.47. As set out at Section 38(6) of the Planning and Compulsory Purchase Act 2004, the presumption is that planning applications are to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

South East Plan RSS

- 4.48. Despite the revocation of the RSS, the South East Plan was prepared and approved following extensive public consultation. PPS3 (June 2010) still includes paragraphs 32-35 regarding assessing an appropriate level of housing. These refer to the need for the level of housing provision to be determined taking a strategic, evidence based approach that takes into account relevant local, sub-regional, regional and national policies and strategies achieved through widespread collaboration with stakeholders.

- 4.49. The abolition of the RSS represents a material consideration. However until the RS tier of the Development Plan has been abolished by legislation and transitional arrangements put in place, the RSS can carry some weight. This matter may be clarified in due course by the High Court, following a recent challenge to The Secretary of State's revocation of the RSS.
- 4.50. In determining levels of housing provision, the factors to be taken into account include evidence of current and future levels of need and demand for housing and affordability levels based upon local and sub regional evidence of need and demand set out in Strategic Housing Market Assessments, as well as published household projections and the needs of the regional economy having regard to economic growth forecasts. Other factors include the overall ambition for affordability across the housing market, including the need to improve affordability and increase housing supply.
- 4.51. Whilst the South East Plan RSS no longer forms part of the development plan the above stated aspirations nevertheless still remain and are informed by levels of housing development included within the South East Plan. These were evidence based and were the subject of the full statutory process including consultation and examination in public. Any alternative housing requirement will need to be subject to a needs based assessment. In light of the fact that the South East Plan was itself sound (within the meaning of the 2004 Act) and by definition based on robust and credible evidence base, the levels of housing provision remain a material consideration. The SOCG (paragraph 7.55) confirms that the Council still rely upon the revoked South East Plan figures of 945 dwellings per annum, as the product of that sound evidence base. In this context and until the evidence base has been replaced they remain a material consideration within the terms of Section 38 (6). The relevant aspects of the revoked South East Plan are set out in Annex 1.

Supplementary Planning Guidance

4.52. The Local Authority has adopted a number of Supplementary Planning Guidance (SPGs) which have relevance to the consideration of application proposals. The SPGs were considered in the context of the overall scheme design and, where appropriate and relevant, informed the design response. This included guidance set out in:

- Design and Sustainability SPD (September 2008);
- Affordable Housing SPD (July 2007) (as replaced by PPS3).
- Housing Mix and Lifetime Mobility Standards SPD (June 2007);
- Landscape and Biodiversity SPD (June 2009);
- Residential Parking Standards (July 2008);
- Tadley Design Statement SPG (April 2004);
- Basingstoke & Deane Employment Land Review (January 2009);
- Section 106 Planning Obligations and Community Infrastructure SPD (April 2006);
- Boundary Hall Site Development Brief (1996) and
- Development Framework Document: Boundary Hall Site, Tadley (D4.20) (2004).

Summary

4.53 The development plan for the purpose of the application is the saved policies within the Basingstoke and Deane Borough Local Plan.

4.54. The application site lies within Tadley, the 2nd largest settlement in the borough and one of the settlements identified in the development plan as being appropriate for new residential development. The site comprises previously developed land, which the development plan prioritises for development in order to minimise the loss of green field sites. The development plan identifies a number of design criteria, dwelling mix, affordable housing and community infrastructure

requirements all of which are met by the application scheme. The application site is also identified in the saved Local Plan as a mixed use allocation to provide for housing and employment opportunities together with an element of open space. Policy D3.17 refers to the provision of a minimum of 100 dwellings with associated open space and landscaping together with employment users. The application scheme accords with this allocation.

- 4.55. The application scheme is fully in accordance with Development Plan policy and the council's SPD's.

5. **PLANNING HISTORY**

- 5.1. Basingstoke and Deane Council adopted the 'Boundary Hall Site Development Brief' in December 1996 (Planning Core Document 15) and the 'Development Framework Document: Boundary Hall Site, Tadley (D4.20)' in July 2004 (Planning Core Document 16).
- 5.2. The introduction to the 'Development Framework Document' confirms that this document is one of a series of background papers to the Local Plan, prepared to show the Borough Council's intention for development at the Boundary Hall site.
- 5.3. In addition, the introduction also confirms that the Development Framework Document was made available for public consultation alongside the Revised Deposit Local Plan during November/December 2003 and was available online, in libraries, at exhibitions touring the Borough as well as copies being sent to statutory consultees (including the HSE at Priestly Road, Basingstoke). This office covers Berkshire, Hampshire, Oxfordshire, Isle of Wight and Dorset. The document was then amended to reflect the comments received.
- 5.4. The adopted Local Plan formally allocated the site for mixed residential development under Policy D3.17 in July 2006. This policy was saved in June 2009. These documents acknowledge the appropriateness of the application site for residential development and factually set out the principles of development for the site as envisaged at the time they were adopted.

Planning Applications

- 5.5. A number of previous planning applications have been submitted in relation to the site. These are set out in the Statement of Common Ground.

MAIN ISSUES

5.6. I have identified the following main issues to be addressed prior to concluding the matters identified by The Secretary of State in his Call In letter dated 4th March 2010:

- Application of Circular 04/2000: Planning Controls for Hazardous Substances.
- Application of Development Plan policy.
- Housing Need
- Affordable Housing
- Meeting other Housing Policy objectives
- Precedent
- Planning Balance

I address each of these in the following sections of my evidence.

6. **APPLICATION OF CIRCULAR 04/2000 Planning Controls for Hazardous Substances**

6.1. The Circular highlights the role of the Health and Safety Executive (HSE) in the Planning System. This is set out in Annex A to the Circular. Paragraph A1 states:

“HSE’s role in the land use planning system is to provide local authorities with advice on the nature and severity of the risks presented by major hazards to people in the surrounding area so that those risks can be given due weight, when balanced against other planning considerations, in making planning decisions.”
(My underlining)

6.2. As the sub heading to Annex A suggests, the HSE’s role is an advisory one. This is reiterated at paragraph A3. Paragraph A3 continues noting that the HSE has no power to direct refusal of planning permission.

6.3. When the HSE advises that there are health and safety grounds for refusing an application, it will, on request, explain to the local planning authority the reasons for their advice.

6.4. The HSE did this in response to Officers of the Council, in terms of both material within and appended to the Planning Officer’s Reports at the June 2009 and January 2010 Committee Meetings and by being present and giving verbal advice direct to the Members of the Council at both meetings.

6.5. The Circular confirms that advice from the HSE to the Local Planning Authority in respect of proposals in the vicinity of hazardous installations is to be based on the following general principles:

- The risk is considered the residual risk which remains after all reasonable practicable preventative measures have been taken

to ensure compliance with the requirements of the Health and Safety at Work etc Act 1974 and its relevant statutory provision.

- The likelihood of an incident, as well as its consequences occurring.
- The size and nature of the proposed development, the inherent vulnerability of the exposed population and the ease of evacuation or other emergency procedures.
- Consideration of risk of serious injury, including that of fatality, attaching particular weight to the risk where proposed development might result in a larger number of casualties in the event of an incident.

6.6. The evidence of Dr. Thorne and Mr. Dillon highlight the extent of residual risk that remains after all reasonable practicable preventative measures have been taken into account, the nature and likelihood of any incident occurring and its consequences. Mr. Dillon's evidence confirms that the new population from the application scheme will not be vulnerable in terms of ease of evacuation and other emergency procedures. Their evidence collectively confirms that the application is acceptable having regard to these matters.

6.7. Paragraph A5 of the Annex notes that any advice from the HSE that planning permission should be refused for development near to a hazardous installation should not be overridden without the "most careful consideration".

6.8. Paragraph A6 confirms that the HSE's role will normally be discharged when it is satisfied that the Local Authority (in this case, The Secretary of State) is acting in the full understanding of the advice received and the consequences that could follow.

6.9. The evidence to this Inquiry ensures that the HSE's role has been discharged. There can be no more careful consideration of the advice from the HSE than to have it examined in the way the applicants technical witnesses have. Their evidence displays a full understanding

of the HSE's advice and the consequences that could follow. It concludes that the proposal is acceptable having regard to the relationship of the site and the proposed development to the hazardous installation, namely the AWE.

- 6.10. Finally in relation to Nuclear Installations there is a requirement for consultation. Paragraph A18 confirms:

“Where the local planning authority is in any doubt about whether HSE should be consulted in a particular case, it is advised to contact the appropriate HSE Area Office.”

- 6.11. The Local Plan proposal for the redevelopment of the Boundary Hall site was subject to wide public consultation, including consultation of the HSE Area Office. No objections were received.

- 6.12. It is the role of the HSE to advise as to the risk of developing the application site but for the decision maker (The Secretary of State) to decide what weight to give that risk.

- 6.13. It is for the decision maker, not the HSE to consider what the level of risk is, whether it is acceptable both in itself and when balancing against other material considerations.

- 6.14. The HSE's evidence to the Brit Oval Inquiry, as recorded by the Inspector (Planning Core Document 18, paragraph 7.18) confirmed that:

“It is accepted that it is not for the HSE to take a view as to where the planning balance lies, nor to comment on the strength of the perceived benefits of the development....”

- 6.15. The HSE reiterated this point its evidence to the Ram Brewery Inquiry (Inspector's Report, paragraph 11.108 – Planning Core Document 17) where the Inspector recorded the HSE's evidence noting that in determining the planning balance it is not for the HSE to undertake the planning balance, but in the planning balance, the HSE's considerations be given due weight.
- 6.16. To conclude, HSE's advice should not be seen as overriding. It must be carefully considered, which includes appropriate testing via expert witnesses from either side.
- 6.17. The HSE's role is an advisory one that relates to the nature of any risk in the surrounding area, its likely incidence and its severity. This is in order that careful consideration and due weight can be given to any risk by the decision maker when balancing against other relevant planning considerations.

7. **APPLICATION OF DEVELOPMENT PLAN POLICY**

7.1. The Development Plan comprises the saved Policies of the Basingstoke and Deane Borough Local Plan (SOCG, paragraph 4.2). Consistent with Section 38 (6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

7.2. The SOCG with Basingstoke and Deane Borough Council confirms that the application scheme is in accordance with the Development Plan (SOCG, Section 7) having regard to the following matters:

- Principle of Development
- Commercial Proposals
- Community Proposals
- Noise
- Biodiversity/Nature Conservation/EIA
- Effective and efficient use of land
- Sustainability
- Design and Layout
- Housing mix
- Affordable housing provision
- Impact on character and appearance of surrounding area
- Impact on neighbouring properties
- Public open space
- Pedestrian access
- Landscaping, tree and ecology
- Highways, access and car parking
- Sustainable construction and design
- Section 106 contributions

7.3. Compliance with the Development Plan represents a weighty material consideration in the determination of the application, consistent with Section 38(6) of the 2004 Act.

7.4. Compliance with the Development Plan also indicates the quality of the scheme and benefits that flow from it. I address these by reference to a number of sub headings as follows.

Tadley – a sustainable location for new residential development

- 7.5. The application site lies within a recognised settlement, wherein development is to be encouraged. The site is allocated in the Local Plan under Saved Policy D3.17, together with another site on land between Mulfords Hill and Silchester Road. These allocations were subject to public consultation throughout the various stages of the Local Plan process. This included consultations with HSE. No objections were received from this organisation.
- 7.6. Following receipt of objections from other stakeholders the suitability of Tadley for additional residential development was debated at the Local Plan Inquiry.
- 7.7. The Local Plan Inspector's conclusion highlighted the merits and suitability of Tadley as a sustainable location for new residential development. The specific allocation of the Boundary Hall site (then Policy No. D4.20) was assessed and accepted through the Local Plan Inquiry process.
- 7.8. The application is consistent with the terms of the Site Specific allocation with regard to housing numbers (minimum 100), extent of employment development, landscaping, open space and access.
- 7.9. In respect of the proposed employment, this is located in a highly accessible position that "will enhance the existing provision of commercial property in Tadley" (SOCG paragraph 7.7).
- 7.10. In terms of sustainability, Tadley is the 2nd largest settlement to Basingstoke in the Borough and benefits from a good quality bus service to Basingstoke. In this regard the application site has direct access to a bus stop on this route (A340) Aldermaston Road. In this sense it represents the best site for sustainable development in Tadley. Its proximity to local employment (See plan DB1), including the District

Centre, Calleva Business Park and the AWE, reinforce the sustainable location of the application site.

7.11. The previously developed land status of the application site reinforces the suitable form of residential development on it. Consistent with Local Plan paragraph 1.10, Saved Local Plan Policy D2, paragraph 1.18 and PPS3 paragraph 36 the priority for development should be previously developed land, in particular vacant derelict sites and buildings. This remains a key consideration in planning for housing (PPS3, paragraph 45).

7.12. The application scheme is consistent with these policy objectives.

Housing Mix

7.13. The proposal includes a policy compliant mix of housing, which accords with the Borough's desire to address the mismatch between the local housing stock and changing household formation patterns and requirements, in particular providing smaller units of accommodation to meet the dwelling number of smaller households.

Affordable Housing

7.14. The proposal includes a level of affordable housing consistent with Saved Local Plan Policy C2. This requires that 40% of the proposed number of dwellings is affordable.

7.15. The scheme is consistent with this requirement. (46 of the 115 units are secured as affordable (see Section 106 agreement and SOCG)). The proposed affordable mix (a mix of 1, 2, 3 and 4 bedroom units) and tenure split (63% social and 37% shared ownership) are also consistent with the Council's Affordable SPD. This ensures that the quality of affordable housing provision is also compliant.

- 7.16. The proposal is therefore consistent with the Government's commitment to providing high quality housing for people who are unable to access or afford market housing (PPS3, paragraph 27).
- 7.17. Given the opportunity for new affordable housing has been limited in Tadley and there are no other opportunities other than the application site (see SOCG, paragraphs 7.60 and 7.63), PPS3 paragraph 30 confirms that the aim should be to deliver high quality housing that contributes to the creation and maintenance of sustainable rural communities in market towns. This requires planning at local and regional level to adopt a "positive and proactive approach".
- 7.18. The application scheme is compliant with Local Plan Affordable Housing policy and relevant guidance set out in PPS3.

Community Facilities.

- 7.19. The application site includes the former dilapidated cinema building which is currently utilised by the Scouts (see Photograph 5 and 6 in Annex 4). This represents an existing community facility. Saved Local Plan Policy C8 seeks to ensure that the loss of the essential local services and facilities are not lost unless there is adequate alternative local provision.
- 7.20. The SOCG with the Local Planning Authority confirm that the existing Scouts facility is of "relatively poor quality" (paragraph 7.9).
- 7.21. The application scheme includes an obligation (see Section 106 clause 22) to implement an extant planning permission for a new community facility within Tadley off Southdown Road. This lies 500m south west of the application site (see Plan DB1). Planning Core Document 19 includes details of the new community facility. Photograph 8 in Annex 4 illustrates the existing playing field at Southdown Road. With reference to the application plan (Planning Core Document 19), the

proposed improvement will comprise a new purpose built community building of 292m² in area two halls (main hall and small hall), kitchen area, 4 storage rooms and male and female toilet facilities. The new building will also complement existing playground, basketball court, football pitch and green space facilities to create an improved recreational facility for the benefits of Tadley as a whole.

- 7.22. The proposed relocation of the Scout Hut represents a significant enhancement of community facilities for Tadley and its residents and allows a new building to be constructed that is not only fit for purpose but flexible and adaptable to support other recreational uses (subject to agreement in writing by the Local Planning Authority).
- 7.23. The application will therefore not only secure adequate alternative local community facilities but an enhancement of those facilities.

The proposed design and layout

- 7.24. The proposed design and layout of the proposal will create an attractive new residential environment for new residents without impacting on the amenities of either existing residents or new occupiers within the scheme. The proposal accords with the Council's Design and Sustainability SPD (Core Document 7).

Character of area – Redevelopment of a vacant and derelict site

- 7.25. The proposal will redevelop a vacant and derelict site close to the centre of Tadley. The character, appearance and function of Tadley has not been assisted by the vacant and rundown characteristics of the site as seen in Photographs 1 to 7 (Annex 4) that have existed since 1995 when the existing MOD halls were demolished and the council suggested the site be redeveloped for housing. The SOCG at paragraph 7.65 confirms that the "current state of the site is unattractive and fails to contribute positively to the local character of

the area.” The local community wishes to see the site put to a good use that will benefit the local community and contribute positively to the area.

- 7.26. The Local Planning Authority accept that the retained landscape features and proposed new planting would enhance the character of the area (SOCCG, paragraph 7.27).
- 7.27. The proposal will therefore accord with Saved Local Plan Policy D5 which encourages residential and other developments and redevelopment proposals to contribute to social, economic and environmental well being of settlements such as Tadley. The scheme also accords with Saved Local Plan Policy E1 which seeks to maintain and enhance the quality of the built environment. Compliance with these policies and objectives is regarded as important given such sites lie within existing built up areas that are home to residents and also the place where they work and shop (Local Plan, paragraph 2.6 – Planning Core Document 3).

Public Open Space

- 7.28. The application scheme incorporates 2 new areas of public open space. The first relates to a new purpose built equipped kick about space, together with a Locally Equipped Area of Play (LEAP).
- 7.29. This central area of Public Open Space will form a key feature of the proposed development. It will be framed by new residential development on 3 sides to create an attractive setting to the residents, as well as a good quality surveillance space creating a safe environment for play.
- 7.30. The space will be accessible to the residents of the scheme and existing residents of Tadley by the provision of direct footpath access

from Almswood Road. Access will also be provided from the Aldermaston Road (A340) to the east.

- 7.31. The area to the west of the application site is characterised by 1950's housing where no formal areas of either kick about space of a sufficient size and shape are available or equipped play areas provided.
- 7.32. The equipped children's play area and formal kick about will be the only such facilities in this area of North Tadley.
- 7.33. The second open space (Photograph 7) will lie to the north along the Aldermaston Road frontage. This will formalise a mature landscaped area for informal open space to the benefit of existing and proposed residents.
- 7.34. The two new areas will create new usable, accessible and attractive areas of Public Open Space, enhancing the quality of the local environment and living conditions of proposed and existing residents of Tadley.

Pedestrian Access

- 7.35. Part of the application site provides a Public Footpath Link (No. 901) between the residential areas to the west of the site and the District Centre that lies to the south east of the application site. The condition of the eastern section of this footpath is poor where it passes through the application site on its southern boundary.
- 7.36. The application scheme secures the improvement of this Public Footpath link in the following ways:
 - Surface of the footpath will be enhanced. This will make the footpath more attractive to users, in particular for any disabled people.

- The presence of new residential development to the north as part of the application scheme will improve the surveillance of the footpath along this section, again improving the attractiveness of this sustainable link.
- Improved boundary treatment and lighting will improve the environment of the foot path making it safer and more attractive to users.

7.37. These improvements will enhance the attractiveness of the path, integrating the proposed development into Tadley, whilst also assisting in creating a more permeable environment encouraging sustainable and safer movements between existing and proposed residential areas, the town's District centre and principal bus route, consistent with saved Local Plan Policies E1 and A2 and the objectives set out in PPG13 (paragraphs 4 and 75-77) and 17 (paragraph 32).

Highways, access and car parking

7.38. The proposed means of access, internal highway design are compliant with Hampshire County Council and Local Planning Authority Standards.

7.39. The SOCG with the Local Planning Authority confirms that the level of car parking is acceptable, in particular having regard to the location of the application site in respect of access to employment, shopping and transport nodes and extent of affordable housing (SOCG, paragraph 7.43).

Conclusions

7.40. The application scheme is compliant with Saved Local Plan Policies and their objectives. Where relevant the proposal is also consistent with the Council's SPD's and advice in PPS1, 3 and PPG13 and 17.

7.41. This compliance highlights a number of benefits that flow from the application scheme. These include:

- Redevelopment of a longstanding derelict and vacant previously developed site in a prominent location in a sustainable settlement within the Borough.
- Making efficient and effective use of previously developed land. This has the added benefit of reducing the pressure for releasing less environmentally appropriate and sustainable greenfield sites on the edge of other settlements.
- Reusing a vacant and unattractive site close to the centre of Tadley, that currently detracts from the character, appearance and function of Tadley.
- Providing a housing mix that seeks to address a mismatch of small dwellings in the Borough, whilst also creating sustainable, inclusive and mixed communities.
- Enhancing the residential environment of the existing population and the character and appearance of Tadley.
- Creating a new high quality residential environment for Tadley, enhancing its residential stock in terms of quality of build and housing mix.
- Providing new housing stock built to meet current day sustainable standards.
- Enhancing the existing provision of commercial property in Tadley.

- Providing enhanced local community facilities through the replacement of the old cinema building with a new purpose-built/community hall complex at Southwood Road, Tadley.
- Enhancing pedestrian access through the site to the District Centre.
- Providing new and improved public open space for proposed and existing residents.

7.42. These benefits are compliant with the Development Plan and are reinforced by three further considerations:

- Affordable Housing
- General Housing needs
- Meeting other planning policy objectives

These are addressed in the following sections of my evidence.

8. **AFFORDABLE HOUSING NEED**

- 8.1. The application scheme includes provision for 40% affordable housing, consistent with Saved Local Plan Policy C2.
- 8.2. PPS3, paragraphs 27 to 30 emphasise the importance of delivering affordable housing as part of new residential developments.

Evidence of Need

- 8.3. The Borough's Housing Market Assessment for Central Hampshire and New Forest (November 2007) (Planning Core Document 21, paragraph 1.52 of summary report) identifies a net minimum estimate of housing need (social rented houses) for the Borough of 580 units per annum. This figure is reconfirmed in the December 2008 Housing Market Assessment update for Central Hampshire and the New Forest (Core Document 22, Figure 6.3).
- 8.4. The Housing Market Assessment suggests a minimum arising need per annum for Basingstoke and Deane Borough is 920 affordable units.
- 8.5. The 2008-2011 Housing Strategy for Basingstoke and Deane Borough (Planning Core Document 23, page 26) sets out the following position at March 2009:

- A. Existing annual need for affordable housing 773 units
- B. Newly arising need per annum 920 units
Total annual demand for affordable housing 1,693 units (A +B)
- C. Number of vacancies arising from re-lets and new build per annum 1,040 units

Shortfall per annum 653 units

- 8.6. The Council's Rural Housing Study 2010 (excludes Basingstoke Town) assesses the need for affordable housing in the rural area of the

borough that included Tadley. This identifies a total net annual affordable need of 289 units over 5 years.

- 8.7. Consistent with the advice in PPS3 and the objectives of Local Plan Policy, affordable housing is an important component of housing delivery. Affordable housing can be a major barrier to continued economic growth, contributing to significant problems in the treatment and retention and longer distance commuting which, in turn, as to levels of road congestion, pollution and reduced air quality. High housing costs also have potentially serious social consequences. The failure to meet the housing needs of the most vulnerable and lower paid has been shown to affect educational achievement and health.

Affordable Housing Delivery

- 8.8. The Borough has identified the need for between 580 – 920 affordable units per annum (SOCG, paragraph 7.58). This can be compared with affordable housing development in Basingstoke and Deane as follows:

Table 8. 1: Basingstoke and Deane Borough Affordable Housing Completions 2004/05 – 2008/09

Source	Year	No. of dwellings completed (net)	No. of affordable dwellings completed (net)	Affordable dwellings %	Affordable dwellings target %	Annual affordable housing need	Affordable shortfall
AMR 04/05	2004/05	886	277	31.3	20	534	257
AMR 05/06	2005/06	924	276	29.9	40	534	258
AMR 06/07	2006/07	728	281	38.6	40	580	299
AMR 07/08	2007/08	1,418	462	32.6	40	580	118
AMR 08/09	2008/09	1,302	540	41.5	40	580	40
	TOTAL (02/03 – 08/09)	5,258	1,836	34.9	-	2,808	972

- 8.9. Table 8.1 above demonstrates that the 1,863 affordable completions achieved in the 5 year period 2004 to 2009 represents 34.9% of the 5,258 total net completions that were achieved during this period. This is below the current policy constrained 40% affordable housing target set out in the saved Local Plan Policy C2. This is notwithstanding the “jump” in affordable completions in the periods 07/08 and 08/09 where private developers have produced extra affordable units as a result of poor market sales. Furthermore increased funding of £12.2 million was also made available by the Homes and Communities Agency (HCA) to help offset the decline in the private housing market with a total of over 200 extra affordable units in the process of being delivered (Planning Core Document 27, paragraph 5.5).
- 8.10. Notwithstanding these “one off” circumstances, affordable housing completions are still failing to meet identified affordable needs.
- 8.11. An assessment of 1,836 affordable completions for the period 2004 to 2009 against net annual outstanding need for 580 subsidised affordable homes identified in the 2007 Housing Market Assessment results in a cumulative shortfall of 972 net outstanding affordable housing needs as at 1st April 2009.
- 8.12. There is therefore a significant shortfall in meeting affordable housing needs within the Borough. The Council have achieved an annual average of affordable housing completion rate of 367 units ($1836 \div 5$ years). The 46 affordable units proposed on the application site will represent 12.5% of this annual average completion rate from one site alone. This is significant given the concentration of affordable completions in Basingstoke town and the lack of any meaningful affordable housing provision in the second largest settlement in this part of the Borough (see below).
- 8.13. The above findings are reinforced by affordable housing issues in Tadley.

Affordable Housing in Tadley

8.14. The Saved Basingstoke and Deane Local Plan identifies Tadley as a sustainable location for new residential development. The Local Plan identified two allocated sites to come forward for development to meet Borough Wide housing needs, but also to reflect the scale, sustainable nature and aspirations for housing in this part of the Borough. Neither allocation has yet to come forward. They represent the only opportunities for sizeable residential development schemes in Tadley that would trigger affordable housing provision (SOGC paragraph 7.63).

Table 8.2 below sets out the affordable housing completions in Tadley since 1997/1998.

Table 8. 2: The affordable housing completions in Tadley since 1997/98

Year	Site	No. of units
1997/1998	Pinks Lane, O'Bee Gardens, Tadley	48
1997/1998	Newchurch Road, Tadley	27
1998/1999	Nil	0
1999/2000	Nil	0
2000/2001	Nil	0
2001/2002	Bond Close/off Franklin Avenue, Tadley	6
2001/2002	West Street, Tadley	14
2001/2002	Halstead House, Tadley	15
2002/2003	Nil	0
2003/2004	Nil	0
2004/2005	Nil	0
2005/2006	Blakes Lane, Tadley	9
2006/2007	Nil	0
2007/2008	Nil	0
2008/2009	Nil	0
2009/2010	Nil	0
	TOTAL	119

8.15. Over the last decade (2000-2010), there have been only 44 affordable housing completions in Tadley (an average of 4.4 units per annum) and only 9 affordable completions since 2001/02 and zero since 2005/06. This illustrates the significant under-provision in Tadley, the second largest settlement in the Borough.

8.16. The Affordable Housing Strategy 2010 identifies an annual need for affordable housing in Tadley of 23 units (SOCG, paragraph 7.61). The Housing Needs Register identifies a need for 188 affordable housing

units in Tadley as of June 2010. This includes a need for a variety of different dwelling sizes including one and two bed flats and 2, 3, 4 and 5 bedroom houses.

- 8.17. Against these identified levels of affordable need the proposed development would deliver a total of 46 affordable units, a significant increase in provision.
- 8.18. The need for additional affordable housing delivery in Tadley is further underlined by the fact that large schemes relied upon by the Council to come forward in Tadley have not been delivered. Basingstoke and Deane Borough Council's Assessment of Land Supply (December 2009 AMR – Planning Core Document 27) confirms that only two sites (the application site and land between Mulfords Hill and Silchester Road) are larger enough to attract a requirement for affordable housing. The other site to the application site has an estimated capacity of 40 dwellings, which would generate a requirement for 16 affordable units. The deliverable status of this and other identified sites is set out in Annex 2. This site is not subject to any planning applications and its availability and deliverability is uncertain. The extant permissions in Tadley at 1st April 2009 (2009 AMR Annex Planning Core Document 27) do not include any other sites that trigger an affordable housing requirement.
- 8.19. The SOCG confirms at paragraph 7.63 that there are no other deliverable, available plans or projects to meet either current or cumulative affordable needs in Tadley, other than the application scheme.
- 8.20. The shortage of affordable housing provision within the District against identified affordable housing need and the lack of any provision in Tadley whatsoever is a significant factor that should weigh heavily in favour of granting planning permission for the application scheme.

- 8.21. The delivery of 46 affordable dwellings arising from the application proposal is therefore a material consideration in favour of the planning application (SOCCG, paragraph 7.64).
- 8.22. This finding is reinforced by the quality of the affordable housing. Affordable needs include requirements for 1 and 2 bedroom flats, as well as 2, 3 and 4 bedroom dwellings (Local Housing Needs Register).
- 8.23. The application scheme includes an affordable housing mix comprising:
- 10 No. 1 bed flats
 - 21 No. 2 bed flats
 - 11 No. 3 bed flats
 - 4 No. 4 bed flats
- 8.24. This affordable mix has been agreed with the Council's Housing Officer (para 38 of Mrs. Fenn-Tripp's Proof).
- 8.25. The Council's Affordable Housing SPD (Planning Core Document 8) indicates that of the 40% affordable requirement, 25% of a development should comprise affordable for rent and 15% shared ownership. The application scheme provides 29 rented units (25%) comprising a mix of 15 houses and 14 flats. The remaining 17 units are shared ownership units (15%).
- 8.26. The scheme matches the Council's tenure split requirements. The distribution of the units on the site has also been agreed with the Council's Housing Officer.
- 8.27. It is evident that the application scheme secures quality affordable housing.

- 8.28. Accordingly significant weight should be attached to this in the determination of the application, not only as a material consideration but also consistent with the housing objectives of the saved Local Plan and PPS3.

Conclusion

- 8.29. The need to deliver much needed affordable housing in Tadley, the second largest settlement in the Borough is a material consideration in the determination of the application.
- 8.30. The need for affordable housing in Tadley is both critical and substantial. Against this need, insufficient affordable units are being delivered in either the Borough or Tadley itself.
- 8.31. The application scheme delivers a significant proportion of affordable units at a time of insufficient housing delivery in Tadley. The nature of the affordable units, in terms of dwelling sizes and tenure mix, accords with the identified needs of the area. Their location within the proposed development will secure a mixed, inclusive and sustainable community. The location of the affordable housing in terms of available public transport and local employment also enhances the quality of the affordable housing provision. The affordable housing element of the scheme also has the support of the Council's Housing Section.
- 8.32. The proposed affordable housing accords with relevant Development Plan Policy, the Council's Affordable SPD and National Guidance – PPS3.
- 8.33. These represent significant benefits. Considerable weight should be placed on securing the delivery of affordable housing in determining the application.

9. **HOUSING NEED**

- 9.1. PPS 3, June 2010 still requires local planning authorities to maintain a continuous 5 year supply of deliverable sites available for housing (paragraphs 54, 70 and 71). Following the revocation of the RSS, local planning authorities are now responsible for establishing their housing requirements. The DCLG letter of the 6th July 2010 (Planning Core Document 26) included guidance for local authorities following the revocation of Regional Strategies. This confirms that some authorities may decide to retain their existing housing targets that were set out in the revoked Regional Strategy. In this regard the SOCG with the Local Planning Authority confirms that the Council continue to plan for a level of housing based on the revoked RSS level of provision of 18,900 dwellings (945 dwellings per annum) for the period 2006-2016, albeit in a two phases. The Council's position on this is set out in a report to the Planning and Infrastructure Overview and Scrutiny Committee dated 17th December 2009 (Planning Core Document 27) which informed the Borough's 2009 AMR. The Council's two phased approach to addressing the RSS level of housing provision is summarised in numerical terms below.

Table 9.1

Completions 2006-2009	3,448
Estimated completions 2009-2010	1,055
Total completions 2006-2010	4,503
South East Plan requirement 2006-2026	18,900 (945pa)
BDBC South East Plan requirement 2006-2016	9,450 (945pa)
BDBC residual requirement 2010-2016	4,947 (825pa)
South East Plan (GOSE) residual requirement 2010-2026	14,397 (900pa)

- 9.2. The Council accepts that the application site is required in order to maintain a 5 year housing land supply (Statement of Common Ground, paragraph 7.57).

Revoked South East Plan

- 9.3. The revoked South East Plan (Policies H1 WCBV3) sets out a requirement for the provision of 18,900 net additional dwellings or 945 dwellings per annum within the Borough in the period 2006-2026. This is to be provided within the component parts of the Borough as follows:

Western Corridor:	18,300 (915 per annum)
Rest of District:	600 (30 per annum)
Total:	18,900 (945 per annum)

- 9.4. Nowhere in the South East Plan is there reference to a phased approach to the delivery of these housing numbers between any particular phase and/or phases of the plan period. This is confirmed in a letter from GOSE (Planning Core Document 28). The baseline requirement is for the delivery of a net additional 945 dwellings per annum.
- 9.5. At the 17th December 2009 Planning and Infrastructure Overview and Scrutiny Committee (Planning Core Document 27) officers reported at paragraph 4.2 stating that:

“Guidance produced by the Department of Communities and Local Government, and the Planning Inspectorate clearly states that local authorities should meet their South East Plan housing requirement. Whilst Members have yet to decide which housing targets should be met in a Local Development Framework, Core Strategies should be in conformity with regional housing requirements and the failure to comply with this would risk a finding of unsoundness. The Planning Inspectorate would also apply the South East Plan housing requirement at any appeals relating to housing development. Therefore it is considered prudent to use the 945 housing requirement for the overall purposes of this report.”

- 9.6. The Local Planning Authority’s assessment of the 5 year housing land requirement and supply relies upon the delivery of the application site

in order to avoid a shortfall in meeting its self-assessed (two phased) strategic 5 year housing requirement (SOCG paragraph 7.57).

This shortfall is increased having regard to two points. The first relates to the calculation of the requirement; the second concerns the extent of deliverable supply.

1 Housing requirement

- 9.7. The council's land supply shortfall is increased when the council's assumed supply of deliverable sites are compared with the actual annualised South East Plan requirement of 945 dwellings per annum 2006-2026. The Local Authority's phased approach to meeting the housing requirement does not consider the annualised requirement rate set out in the South East Plan. The GOSE letter (Planning Core Document 28) confirms that Basingstoke and Deane's Borough Council's approach to calculating the housing land supply requirement in this way is not supported. Four reasons are given. Before addressing these, the Council's explanation for a two phased approach to the housing requirement is set out in the 17th December 2009 Report to the Planning and Infrastructure Overview and Scrutiny Committee (Planning Core Document 27 (paragraphs 4.3 and 6.8)). The two phased approach stems from the Secretary of State's Proposed Modifications Schedule of Changes and Reasoned Justification which related to the Borough's housing requirement increasing from 825 to 945 dwellings per annum and a note indicating that the additional uplift is placed in the second phase of the Plan. Accordingly the Borough believe it is reasonable to take a two phased approach to the Council's housing requirement whereby the number of units that have already been completed during the plan period are taken off the housing requirement for the first half of the plan period only. This will therefore result in a lower requirement up to 2016, after which the requirements will be increased to 945 dwellings per annum for the remaining 10 years of the Plan (2016-2026).

9.8. In response the GOSE confirmed that they did not agree with this methodology, or assumptions that underlie it, for four reasons. These were:

- “1. **The final version of the South East Plan does not include any phasing in Policy H1. This was intended to provide flexibility to local authorities in the delivery of housing. It should be noted that in GOSE’s view any reference, assumed or otherwise, to phasing in any documentation prior to the final version of the Plan is not a material consideration, since case law indicates that a final plan supersedes all that preceded it (IJeantwill Ltd –v- Secretary of State for the Environment and Cherwell District Council [1993] JPL445). Therefore the Council should not be relying upon what are superseded documents as a justification for its methodology.**

2. **GOSE considers that unless material considerations indicate otherwise, authorities should use the standard 5 year housing land supply methodology (as set out in the PINS hosted CLG advice <http://www.planning-inspectorate.gov.uk/pinsadvice> for insp/advice produced by dclg.htm).**

3. **Using the standard methodology, and the information available via the Councils 2009 AMR Basingstoke appears to have a 4.6 year supply. Therefore unless it can demonstrate that circumstances have changed and hence a 5 year or more supply now exists, GOSE would expect the Council to implement national policy contained in PPS3 para 71. It states that *“where Local Planning Authorities cannot demonstrate an up to date 5-year supply of deliverable sites....., they should consider favourably planning applications for housing, having regard to the policies in this***

PPS including the considerations in paragraph 69". GOSE would therefore wish to receive confirmation of the actions the Council is taking to ensure it accords with para 71.

4. **Where, in accordance with the flexibility offered by the South East Plan, an authority wishes to promote and rely upon a phased approach to housing delivery, GOSE considers that it may only do so via its Core Strategy, or possibly a subsequent daughter DPD. More importantly, such an approach will only carry full weight once the Core Strategy (or other DPD) has been tested at Examination and found sound. Prior to adoption, any proposed phasing may be capable of being a material consideration (particularly if tested and found appropriate at appeal) but the weight to be attached will naturally be less."**

9.9. The DCLG Publication and Land Supply Assessment check provides information on the National Guidance in relation to what local authorities are required to produce to demonstrate their 5 Year Land Supply Statement. Chapter 4 of the publication sets out information on how to calculate the requirement/supply, including in relation to the need to specify the period covered, the basis on which the requirement has been assessed and the components of supply in meeting the requirements. Paragraph 4.19 identifies Good Practice Authorities whose calculations and approach to identifying a 5 year housing land supply position has been effectively endorsed. This includes the Liverpool City Council model that subtracts the completions from the overall requirement and then divides the residual to be met by the number of years remaining to give an annualised figure. This approach is the most appropriate in all of the circumstances.

9.10. On the basis that the requirement is calculated based on the correct interpretation of the South East Plan, for the Borough as a whole, based upon the actual annualised requirement set out in the South East Plan, in absence of complete figures for each sub area, the housing land supply position adopting the annualised approach set out in the GOSE letter (Planning Core Document 28) is as follows:

- Requirement to 2006 to 2026: 18,900 (945pa)
- Completions 2006 to 2010: 4,503⁽¹⁾
- Residual requirement 2010 to 2026 (16 years): 14,397 (900pa)
- 5 year requirement 2010 to 2015: 4,500

(1)Includes predicted completions for current monitoring year 2009/2010 as per GOSE letter (document 28)

9.11. Appendix 1 of the Council's December 2009 AMR (Planning Core Document 27) sets out a schedule of all of the sites relied upon by the Council as deliverable housing land supply. Basingstoke and Deane Borough Council have identified 4,132 deliverable dwellings for the period 2010-2015.

9.12. Adopting the Council's own supply assessment, the 5 year housing land supply position is as follows:

- 5 year requirement 2010 to 2015: 4,500
- BDBC assessed deliverable supply: 4,132^{(1) and (2)}
- Shortfall/surplus: -368
- Year's supply: 4.6 years

(1)Includes predicted completions and current monitoring year 2009/2010 as per GOSE letter (document 28)

(2)BDBC's Assessment includes the delivery of 100 dwellings on the Boundary Hall application site by 2015

9.13. In an update report in the consideration of a planning application at Worting Farm (application No. BDB/71886 – Development Control Committee 12/05/2010 update) (Planning Core document 29 page 2 of 3), the Officers noted:

“It is recognised that if the standard methodology for assessing 5 year housing land supply is applied, then the Borough has 4.6 years of supply (as at 1st April 2009).

9.14. It is clear from the above there remains a deficit in the 5 year housing land supply. Basingstoke and Deane Borough Council's Assessment also includes an assumed delivery of 80 dwellings from the application site by 2014 and a further 20 (100 in total) by 2015. Failure to allow the site to come forward would further increase the shortfall against the 5 year housing land supply requirement.

2. Housing Land Supply

9.15. From an appraisal of Basingstoke and Deane Borough Council's Housing Land Supply Assessment (my Annex 2) an additional supply shortfall arises from over-optimistic delivery assumptions made by the Local Planning Authority in its AMR. My assessment of deliverable supply identifies a reduction in Basingstoke and Deane Borough Council's assessed deliverable supply of 4,132 dwellings by 1,120 to 3,012 dwellings. Taken these supply assumptions into account the 5 year housing land supply position can be summarised as follows:

Table 9.2

Woolf Bond's Land Supply Assessment adopting South East Plan Requirement

5 year requirement 2010-2015	4,500 (900pa)
Land Supply	3,012 ^{(1) and (2)}
Deficit	-1,488
Year Supply	3.34

(1)Includes predicted completions and current monitoring year 2009/2010 as per GOSE letter (document 28)

(2)BDBC's/WBP's Assessment includes the delivery of 100 dwellings on the Boundary Hall application site by 2015

Table 9.3

Woolf Bond's Land Supply Assessment adopting BDBC's Housing Requirement

BDBC 5 year requirement	4,125 (825pa)
Woolf Bond's land supply	3,012 ^{(1) and (2)}
Deficit	-1,113
Year Supply	3.65

(1)Includes predicted completions and current monitoring year 2009/2010 as per GOSE letter (document 28)

(2)BDBC's/ WBP's Assessment includes the delivery of 100 dwellings on the Boundary Hall application site by 2015

- 9.16. Against the above background there is an acknowledged and demonstrable shortfall in the Council's 5 year housing land supply position. The GOSE's most recent consideration of this matter comes to the same conclusion. Accordingly there remains a need on either the Council's position or the applicants for the application site to come forward.

10. **MEETING OTHER HOUSING POLICY OBJECTIVES**

10.1. One of the themes in PPS3 is the need for housing policies to be applied in a way that would achieve a “step-change” in housing delivery (PPS3, paragraph 2). The Council accept (SOCG paragraph 7.57) that without the application site the Council do not have a 5 year supply of deliverable sites. When determining applications in these situations paragraph 71 PPS3 states that they should “consider favourable” planning applications for housing, whilst “having regard to the policies in the PPS, including the considerations in paragraph 69”.

10.2. Paragraph 69 in turn requires planning authorities to decide planning applications having regard to:

- i. Achieving high quality housing.
- ii. Ensuring developments achieve a good mix of housing reflecting the accommodation requirements of specific groups, in particular, families and older people.
- iii. Suitability of a site for housing, including its environmental sustainability.
- iv. Using land effectively and efficiently.
- v. Ensuring the proposed development is in line with planning or housing objectives, reflecting the need and demand for housing in, and the spatial vision for, the area and does not undermine wider policy objectives, e.g. addressing housing market renewal issues.

I address each of these in turn.

i. Achieving high quality housing

10.3. The application scheme has been designed to create a high quality new residential environment that respects the townscape and

landscape of the surrounding area as accepted by the Local Planning Authority in the consideration of the application (see Planning Officer's Report, Planning Core Document 2 and SOCG) consistent with saved Local Plan Policy E1 (Development Control). The high quality housing scheme is reconfirmed in the report and the SOCG. Moreover the application scheme:

1. Represents a high standard of design.
2. Responds to the local context enhancing an area of poor design.
3. Provides sustainable homes to at least Code Level 3 confirming the high quality design and high standard of construction.
4. Accords with the Council's Locational, Environmental and Design Policies for new residential development.
5. Preserves the amenities of neighbouring residential properties, in respect of privacy, outlook, sunlight/daylight, and noise and disturbance by reason of traffic movements.
6. Creates opportunities for new areas of public open space that will enhance the quality of the residential environment for both proposed and existing residents in the area.
7. Secures a comprehensive landscaping scheme, to the benefit of the site and surrounding area.
8. Secures enhanced public access across the site to open spaces and nearby District Centre.

ii. Achieving a good mix of housing

- 10.4. The application scheme delivers much need open market housing in a mix and form that accords with the Council's Saved Local Plan Policy C3. This requires 30-50% of all new dwellings to be small units (1 and 2 bedrooms). Furthermore the scheme provides a proportion of houses, the accommodation requirements of specific groups, including families to be met.

10.5. The proposal incorporates a mix of affordable units in both size and tenure that accords with the Council's requirements.

iii. Suitability of a site for housing, including its environment sustainability

10.6. The suitability of the site for housing has been confirmed by its allocation in the saved Local Plan, the Local Plan Inspector's findings on the suitability of Tadley for new residential accommodation and the Council's determination of the application.

10.7. The site represents a derelict and vacant previously developed site that detracts from the surrounding area, making no positive contribution visually or functionally in a area close to the centre of Tadley seen from a number of public places (Footpath No. 901 to the south, Aldermaston Road (A340) to the north and east of Almswood Road to the west).

10.8. Redeveloping a derelict and vacant previously developed site represents a sustainable form of new residential development. Its release reduces the need for less sustainable greenfield sites.

10.9. The site lies in a sustainable location for new residential development being located within Tadley, the second largest settlement in the borough, close to its centre and areas of local employment. The site also lies adjacent to the principle bus route through the town.

10.10. The site is therefore suitable for housing. This is reinforced by securing a number of benefits from its redevelopment for housing.

iv. Using land effectively and efficiently

10.11. The scheme makes efficient use of the appeal site resulting in a density of 41 dwellings per hectare. There is no dispute that the density of development would be appropriate having regard to the nature of the development proposed, the location of the site and the character of the surrounding area.

v. Ensuring the Proposed Development is in line with Planning for Housing Objectives, reflecting the need and demand for housing in, and the spatial vision for, the area and does not undermine wider policy objectives e.g. addressing housing market renewal issues

10.12. The application site is allocated by the Council for residential development. It is one of two sites earmarked for development reflecting the size, level of services, employment and sustainable characteristics of Tadley.

10.13. In this sense it accord with the spatial vision for the area. This is reinforced by its consistency with saved Local Plan Policy D2 and PPS3. Here the Council wish to meet housing needs by developing sustainable brownfield sites before greenfield sites (Local Plan paragraph 1.18). The development of the application site in the manner proposed will accord with this Housing Objective.

10.14. The application scheme will deliver much needed affordable housing to the second largest settlement in the borough where affordable housing delivery is very poor and identified needs remain unmet.

10.15. The 46 affordable units proposed accords with the Council's tenure split, dwelling size and locational requirements. They reflect the need and demand for housing in the area thereby ensuring these important planning housing objectives are met.

- 10.16. Other policy housing objectives are also secured. The scheme will add flexibility to the Council's supply of deliverable sites. The site can come forward immediately to meet identified the shortfall of sites in the district.
- 10.17. The release of the site will not undermine wider policy objectives, for example addressing housing market renewal issues.
- 10.18. The site represents a vacant and derelict site that was once developed but cleared 15 years ago by the MOD in anticipation of new residential accommodation for Tadley. The current rundown site does nothing to Tadley's image. Its renewal, in securing important environmental, recreational, community and social benefits will assist in developing sustainable previously developed land in a sustainable way.
- 10.19. The redevelopment of this previously developed site will reduce the amount of greenfield land required for housing development, reinforcing the wider policy objectives of securing a more sustainable pattern and form of development in the Borough.
- 10.19. Assessment of the application scheme against PPS3 paragraph 69 considerations demonstrates just how well the proposal accords with all relevant policy and objectives of national guidance. This adds significant weight to the merits of the scheme and the case for the application.

11. **PRECEDENT**

- 11.1. The HSE raised this issue when requesting the Secretary of State to call-in the application for determination (HSE letter dated 15/2/2010 to GOSE). The HSE suggested that allowing such a substantial development to go ahead in this situation would have serious precedential implications for control of off-site populations liable to be affected at this and other licensed Nuclear sites.
- 11.2. A number of points arise as follows.
- 11.3. Firstly, It is a well established planning principal that each planning application should be determined on its own individual merits. In this case the application site and scheme with its associated benefits has its own individual and significant merits that are unlikely to be repeated elsewhere in the locality. For instance there is no other site in Tadley that has the same characteristics. The site is unique in terms of its history, being a MoD residential site within the built up area of Tadley, which was cleared in 1995 with Development Briefs and an eventual Development Plan allocation supporting residential development. The vacant and derelict state of the site, its location on the main A340 Aldermaston Road and its proximity to the District Centre also add to its individual unique characteristics.
- 11.4. The site is only 1 of 2 formal saved development plan allocations in Tadley. This further distinguishes it from other sites.
- 11.5. The approval of the Boundary Hall site needs to be considered on its own merits, along with the benefits that any development on this site would bring to the area. The Boundary Hall site is of a sufficient size to deliver a number benefits that no other site in Tadley can bring. These benefits include the development of a derelict previously developed and unattractive site in a prominent location, sustainably located and improved employment development, new public open space, enhanced

community facilities and enhanced footpath linkages. In addition the scale of the development allows important borough wide housing and local affordable housing needs to be delivered. The SOCG at paragraph 7.67 confirms that there are no other deliverable, available plans or projects to meet current or cumulative affordable housing needs in Tadley, other than the Boundary Hall application site. These benefits are not capable of being replicated on other sites in the area

- 11.6. For all these reasons the proposal is unlike any other scheme in Tadley. The approval of the Boundary Hall application on its own individual merits is unlikely to establish a precedent for other residential applications to be granted.
- 11.7. Secondly, there are limited development opportunities in Tadley in any event. Plan DB1 illustrates Tadley with its tightly drawn Settlement Policy boundary. Any site promoted for new residential development beyond the Settlement Policy boundary would be contrary to Development Plan policy.
- 11.8. Open spaces within the settlement area comprise existing public open space, allotments or community facilities, all of which are protected by saved Local Plan policies, in particular Policy C7.
- 11.9. As to other opportunities the Council's draft SHLAA has identified 4 sites with capacity for more than 5 units within the settlement area of Tadley, in addition to the 2 existing Local Plan allocations (Boundary Hall and land between Mulfords Hill and Silchester Road) Annex 3 provides some background information to the 4 highlighted sites. These 4 sites are as follows:
 - Burnham Copse Infant School. This site has been identified as having potential to provide 40 dwellings. An aerial photograph is attached as part of Annex 3. However its suitability is constrained by the playing field status of part of the site and therefore the need to seek agreement of Sports England in respect of loss of playing

fields. The lack of playing field provision in Tadley would suggest that this site is unlikely to be suitable for residential development. In addition the site is also characterised by large areas of mature trees that may also preclude significant development.

- Franklin Avenue. This site has been identified as having potential to provide 5 dwellings. The site comprises 4 different properties (see Site Plan 2 attached as part of Annex 3) and is therefore subject to multiple ownership issues. The last application (BDB/68398) on this site was withdrawn (see Application Site Plan in Annex 3). This related to two of the four properties and proposed nine dwellings. This is against the background of a dismissed appeal for eight. The deliverability of five dwellings on half of the identified site is subject to uncertainty.
- 30 Mount Pleasant. The site has been identified as having potential to provide 9 dwellings. An aerial photograph is attached as part of Annex 3. The site is constrained by extensive trees subject to a TPO. The density assumption of 35 dwellings per hectare to create a yield of 9 units no longer reflects the character of the area or the approach now set out in PPS3. The council refused an application to renew a previous planning permission (BDB/49309). This was refused in 2002. No further applications have been submitted since which suggests there is no longer an interest to develop the site.
- New Road. The site has been identified as having potential to provide 7 units. The site has been subject to previous applications which have been refused on the grounds of design and car parking. The site is sterilised by a mains sewer corridor that requires dwellings to be located on one part of the site without appropriate rear gardens (see Design and Access Statement and Site Layout Plan in Annex 3). Its suitability for the scale of development envisaged has yet to be established.

11.10. Opportunities for new residential development on larger sites are therefore limited.

11.11. Opportunities for smaller sites of less than 5 units are also limited. Annual average small site (< 5 units) completions in Tadley since 2001 are 7. Furthermore the HSE have suggested in respect of single dwelling schemes that it would be disproportionate to advise against the grant of planning permission (HSE response to application No. BDB/71921 – see Development Control Committee 7th April 2010

update as part of Annex 3). The approval of the Boundary Hall application would not therefore have an impact on these very small scale schemes.

11.12. Outside of Tadley, the area is predominantly rural in character where Development Plan policy restricts net additions of residential development. To the north of Tadley, in West Berkshire District, the area is also predominantly rural where Development Plan policy precludes new residential development. The Village of Aldermaston, 2km north of Tadley, includes an allocation for 29 units. Planning permission has already been granted for these units. There are no other clear opportunities for further development in this locality.

11.13. The above analysis confirms that the opportunity for future development in the area is limited. The consequences of allowing the Boundary Hall application are not only limited, but reinforce the need to allow this rare development opportunity to come forward to meet local development and community needs.

11.14. The approval of the Boundary Hall site needs to be considered on its own merits, along with the benefits that any development on this site would bring to the area. The Boundary Hall site is of a sufficient size to deliver a number benefits that no other site in Tadley can bring. These benefits include the development of a derelict previously developed and unattractive site, sustainably located and improved employment development, new public open space, enhanced community facilities and enhanced footpath linkages. In addition the scale of the development allows important borough wide housing and local affordable housing needs to be delivered. The SOCG at paragraph 7.67 confirms that there are no other deliverable, available plans or projects to meet current or cumulative affordable housing needs in Tadley, other than the Boundary Hall application site.

- 11.15. For all these reasons the proposal is unlike any other scheme in Tadley. The approval of the Boundary Hall application on its own individual merits is unlikely to establish a precedent for other residential applications to be granted.
- 11.16. Finally, Dr. Thorne's evidence confirms that the application scheme is consistent with Nuclear Siting Guidelines and therefore will not set an undesirable precedent locally or nationally.
- 11.17. The unique benefits arising from the application are material considerations that cannot be repeated elsewhere. For these reasons the approval of the application will not lead to other planning permissions being granted that could lead to undesirable implications for controlling off-site population levels around the AWE.

12. **PLANNING BALANCE**

- 12.1 Section 38 (6) of the Planning Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The application scheme is in accordance with the Development Plan and should therefore be supported.
- 12.2 The planning application would have been approved by the Local Planning Authority and not called in by The Secretary of State had it not been for the HSE's Advise Against Consultation Response.
- 12.3 The applicant's technical evidence confirms that the application scheme is acceptable in terms of Nuclear Siting Guidelines, emergency planning capabilities and risks to public health and safety.
- 12.4 Circular 04/2000: Planning Controls for Hazardous Substances confirms the advisory role of the HSE. In the context of this Call In Inquiry and consistent with Annex A, paragraph A1 of the Circular, the HSE's role in the land use planning system is to provide, in this instance to the Inspector and the Secretary of State, with advice on the nature and severity of the risks presented by the AWE operation to people in the surrounding area including the application scheme so that those risks can be given due weight, when balanced against other planning considerations, in making planning decisions. It is for the Secretary of State, through this Call-In procedure, to determine the amount of risk for the individual and society that may result from the grant of planning permission for the proposed development. It is not for the HSE to do this. There is a necessity through the Call-In Inquiry to review and test the credibility of the HSE's Advise Against conclusion. The evidence of Dr. Thorne sets out the nature and severity the risks (or lack of) presented by the AWE operation to the surrounding area and the fact that the proposed development will not

conflict with UK Siting Guidelines that have been developed to limit population or societal risk imposed by the AWE. Accordingly a judgement can be made regarding the weight to be attached to the HSE's concerns. The applicant's conclusion is that no weight should be applied to the HSE's Advice Against conclusions.

12.5 Consistent with Circular 04/2000, the advice from the HSE must be afforded the most careful consideration. Dr. Thorne's and Mr. Dillon's evidence is an illustration of that. In this regard the Circular notes that the advice from the HSE "should not be overridden without the most careful consideration". Following the applicant's careful consideration of the Health and Safety issues, it is a question of exercising a balanced judgement on the basis of all the material planning considerations in order to assess whether the identified nature and extent of risk is unacceptable, either in itself or when balanced against other material planning considerations associated with the proposed development in coming to a planning decision on this application. In this regard the other planning considerations that need to be balanced against the extent of any risks identified can be summarised as follows:

12.6 Redeveloping a large, derelict and vacant previously developed site in a prominent location within the second largest settlement in the Borough.

- By doing so in the manner proposed the scheme realises a number of site/area specific benefits that cannot be realised elsewhere or by other means. These include:
 - Enhancing a site that has longed form part of the built up area of Tadley, yet for the last 15 years has been left vacant and derelict, detracting from the character and appearance of the town.
 - Providing much needed local affordable housing, in a large settlement where no material provision has been forthcoming for the last 15 years. No other site has been identified that can deliver any meaningful affordable housing to Tadley.

- A scheme that will deliver enhanced essential local community facilities for the benefit of existing and future residents of the town.
- A scheme that will deliver new and improved public open space, meeting not only the needs of the proposed development but also existing residents where formal kick about and equipped play areas do not exist.
- Redeveloping the site that secures enhanced footpath links across it, assisting sustainable connectivity through Tadley to its District Centre, principal bus stops/route and new public open space.
- Redeveloping a site and delivering improvement to the town's dwelling stock in terms of modern sustainably constructed and occupied dwellings in a mix that meets reducing household sizes.

The application scheme will deliver wider more general benefits. These include:

- Redeveloping a previously developed site, thereby reducing pressure on more environmentally sensitive greenfield sites elsewhere within the Borough.
- Meeting Borough Wide housing needs.
- Improving the stock of commercial property in Tadley.

12.7 The realisation of these benefits and compliance with Development Plan policy outweigh any risks associated with the development of the site. The applicant's evidence suggests that the risks either do not arise or are not so great as to forego the merits and benefits that this scheme will bring to Tadley.

12.8 Accordingly and consistent with Circular 04/2000, paragraph A1, having given due weight to the risks identified by the HSE these, when balanced against other planning considerations, in making a planning decision on this case do not outweigh the presumption in favour of a

development consistent with Development Plan policy and other relevant material considerations.

13. **SECRETARY OF STATE CALL-IN MATTERS**

1. **The extent to which the proposed development is in accordance with the development plan for the area, having regard in particular to Regional Spatial Strategy for the South East – South East Plan published 6th May 2009 and the Basingstoke and Deane Local Plan 1996-2011 (saved policies)**

- 13.1 Since the Secretary of State's Call-In Letter dated 4th March 2010 the Government has revoked the South East Regional Spatial Strategy. Accordingly the only Development Plan comprises the Saved Policies of the Basingstoke and Deane Local Plan 1996 – 2011. Planning applications continue to be considered having regard to this Plan.
- 13.2 The SOCG with the Local Planning Authority and my evidence above confirm that the proposed development is in accordance with the Saved Policies of the Basingstoke and Deane Local Plan 1996-2011.
- 13.3 Consistent with Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications should be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The approval of the application would be consistent with the Development Plan and the 2004 Act.
2. **The extent to which the proposed development is consistent with any emerging Development Plan Documents, including consideration of the weight to be attached to them**
- 13.4 The council are at the early stages of preparing a draft Core Strategy. As part of preparing a Core Strategy the Council have produced two consultation documents; An Issue and Options Paper in 2008 (Planning Core Document 30) and a Key Themes Paper in 2010

(Planning Core Document 31). Neither of these affects the merits of the application scheme.

13.5 A pre submission draft of the Core Strategy was to be consulted on in October/November 2010. However following the announcement of the Secretary of State for Communities and Local Government to revoke the RSS, the council have suggested that further work be carried out before the Core Strategy can be progressed No weight can be given to these exploratory documents.

3. **The extent to which the proposed development is consistent with policies to ensure that any unacceptable risks to human health are identified and properly dealt with**

13.6 Circular 04/2000 requires very careful understanding of the HSE's advice. The evidence from the applicant's confirms that they fully understand the HSE's advice and the consequences that could follow.

13.7 The HSE accept that it is not for them to take a view where the planning balance lies, nor to comment on the strength of perceived benefits of the proposed development (evidence to the Brit Oval Inquiry – Planning Core Document 18).

13.8 The nature and severity of any risks to public health are explained in detail by Dr. Thorne and Mr. Dillon. There evidence confirms that the proposed development is acceptable in respect of risks to human health arising from the location of the application site in the vicinity of the AWE.

13.9 The nature and severity of any risks are to be given due weight and balanced against other planning considerations, when making a planning decision. The applicant's evidence confirms that there are no unacceptable risks to human health arising from the proposed development.

4. **Whether there are any other material planning considerations relevant to the Secretary of State's consideration.**

13.10 The starting point is whether the application scheme is compliant with the Development Plan. The two principle planning parties at this inquiry believe it is (SOCG). The proposal is consistent with other material considerations, including National Guidance in PPS1, 3 and PPG13 and 17.

13.11 The scheme secures a number of benefits as well as meeting housing needs. These too represent other material considerations.

13.12 The HSE's advice represents a further material consideration. However the applicant's evidence regarding Nuclear Siting policy and emergency planning and demographics confirm that the proposal is acceptable having regard to these matters. The applicant's evidence represents material considerations that also support the application.

13.13 There are no material considerations that outweigh the determination of the application in accordance with the Development Plan. Moreover the other material considerations reinforce the case for approving the application.

5. **Whether any planning permission granted should be accompanied by any planning obligations under section 106 of the 1990 Act and, if so, whether the proposed terms of such obligations are acceptable**

13.14 A set of agreed conditions are set out in the Statement of Common Ground.

13.15 A Unilateral Obligation agreed with Basingstoke and Deane Borough Council and Hampshire County Council has been completed and secures all relevant obligations having regard to the application of Development Plan policies. A copy is attached to the Statement of

Common Ground. The evidence of the Council in respect of obligations (Mrs. Fenn-Tripp) is accepted. The obligations meet the 3 tests set out in Communities Infrastructure Levy Regulations 2010, Regulation 122.