

RSS EXAMINATION IN PUBLIC SOUTH EAST

**STATEMENT BY CPRE WESTERN CORRIDOR SUB-GROUP:
PARTICIPANT 7148**

MATTER 8J

WESTERN CORRIDOR AND BLACKWATER VALLEY

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8J/CPRE Western Corridor Sub-group (7148)

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8Jii.1 Are the housing figures set at the most appropriate level, taking account of the environmental assets and the infrastructure constraints and the economic pressures in the area?(Policies WCBV2, WCBV3 and Table WCBV1)?

1.1 CPRE consistently supports 'quality of life' considerations in contributing to the South East Plan. Nowhere is this more relevant than in the sub-region, where environmental assets of the Thames Valley, AONBs, Thames Basin Heaths etc. are specifically identified and are representative of areas with recognised landscape designations warranting protection.

1.2 In addition, throughout the sub-region, valued areas with Local Landscape Designations are identified within Local Plans and LDFs. SEP should take these fully into account, where justified, in addition to areas covered by international, national and regional designations. *'LLDs have generally been perceived to be successful in protecting areas of high local landscape value from development.'* (Countryside Agency: Review of LDDs. June 2006).

1.3 The total area of all such designated landscape in the sub-region is much greater than any one map would indicate. In addition, known infrastructural constraints, particularly of water, sewerage and transport, place severe limitations on all development, particularly greenfield, underlining the necessity for policies to ensure most development will be on brownfield sites.

1.4 While CPRE recognises the EIP will not consider an overall housing allocation below that of Plan, there are so many constraints in terms of the environment and infrastructure that there can be no case for any additional sub-regional allocation. In any promotion of 'sustainable urban extensions' as under Policy WCBV2, CPRE fully endorses the proposed protection to landscape areas as outlined, together with the locally designated areas as above.

1.5 There are also dangers of linear development on greenfield land hemmed in by Green Belt, AONBs and the SPA, particularly along the A4, A33 and A339 bounding the Reading, Basingstoke and Newbury triangle. This would damage the countryside and lead to urban sprawl. Areas south of Reading and north of Basingstoke are especially vulnerable.

1.6 Appropriate distribution of housing is a very significant issue in relation to arbitrary sub-regional boundaries. The overlap into AONBs and the division of communities, even villages, is discussed under 8Ji1 by CPRE South East (7124) and 8Jii4 to follow. While specific boundary improvements are warranted in rural areas, the panel is asked to ensure that in any major revision of the size of the sub-region, the housing allocation is reviewed accordingly.

1.7 Policy WCBV3 discusses joint Local Development Documents. 'Consideration' is not an adequate approach to issues that cross administrative boundaries. In particular, joint working should be **required** for the Blackwater Valley. The potential of this area, comprising several townships in three counties, would best be exploited by a unitary designation and a brief for regeneration. Centred on Aldershot and working around military and SPA designated areas, this requires a comprehensive appraisal. On maps, the Blackwater Valley should be re-drawn, if indicated at all, without Farnham and wholly within the sub-region.

1.8 The Blackwater Valley does not warrant inclusion within the name of the sub-region, any more than say Reading or Basingstoke. If, as has happened in the central district of both above towns, regeneration of Aldershot is achieved in part by high rise development, it may help to relieve pressure on dwelling allocations elsewhere. However, SEERA's late addition of 'and Blackwater Valley' after the name 'Western Corridor' is cumbersome and misplaced.

8Jii.2 Is the regional affordability target the most appropriate guidance for this sub-region?

2.1 The level of affordable housing is derived from national and regional housing policies. Affordable housing remains a key issue in the area, but resources need to be targeted to local key workers and younger first time buyers. Market trends, as reflected in the housing market areas are likely to continue over the first half of the Plan period and the dominance of market housing is almost certain to continue. CPRE supports affordable housing at the levels suggested as the minimum required to meet the wider needs of the community and the local economy.

2.2 The sub-region is characterised by pressures of affordability and lack of access to housing. It is an area of high demand, limited supply and high costs that worsened with the overheating of the region's economy and house price inflation spiralled. A limited supply, accentuated by any over-provision of land for business and under-provision of infrastructure, means that only those in greatest need are likely to be allocated affordable housing. This may lead to concentrations of disadvantage and may create social problems.

2.3 CPRE and the National Housing Federation, which represents 1,400 housing associations in England that provide two million homes for five million people, published a joint Charter: 'Protect Rural England: Build an Affordable Home' in July 2006. This alliance recommends:

1. *More public investment in affordable rural housing.*
2. *More effective planning so that local council planners provide enough sites with planning permissions.*
3. *Secure mixed communities in thriving rural settlements with a range of house types and a range of residents living close to flourishing businesses, so that people don't have to commute long distances.*
4. *Better use of existing buildings—affordable housing supply could be increased through a targeted programme to reduce empty property in rural areas, reducing VAT on refurbishment work from 17.5% to the 5% level applied to new build.*
5. *Build to high environmental and design standards, so that new rural homes—be they private sector or affordable—enhance rural communities and contribute to protecting the environment as well as keeping down running costs.*
6. *Restraint on the Right to Buy in rural areas of acute housing pressure, with equity shares considered as an alternative.*
7. *Ensuring enough social rented homes are built—the Affordable Rural Housing Commission suggests there is a need for 7,600 social rented homes a year in rural areas, as well as an increase in low cost home ownership.*

All these points are highly relevant to this sub-region.

2.4 Housing is likely to remain relatively unaffordable for at least 10 years, even for middle-income earners. Private renting is very expensive and it is difficult to access owner occupation unless already on the housing ladder. However, it is essential that the social benefit from making housing affordable stays with the property in perpetuity. The higher the proportion of affordable dwellings the less the chance of owner-occupiers who may become over-stretched financially by taking on too large a mortgage. Careful housing management and targeting will always be needed.

8Jii.3 Have all the options for locating housing development been fully explored, including new locations and settlements as well as urban extensions (Policies WCBV1, WCBV2 WCBV3)?

3.1 Within the sub-region, the South East Plan proposes the maximum level of housing development believed to be sustainable. The question: “Have all the options..... been fully explored” is an open invitation to proponents for more housing to ignore or override constraints on further development articulated by the Regional Assembly. In the light of the panel decision not to consider any reduction of allocation, there is no commensurate opportunity to respond that too many options have already been entertained.

3.2 The proposed SEP dwelling allocation for the sub-region corresponds to the RPG baseline. CPRE has consistently put the case for no more housing than RPG/SEP, summed up as in the interest of the quality of life, setting out why it believes economic growth criteria can be better satisfied through smart growth and longer working lives rather than inward migration.

3.4 If DCLG/GOSE’s proposals for New Growth Point Dwelling Numbers for the period 2006 – 2016 represent additional housing, 2 of the 7 indicated locations are within the sub-region. These suggest an additional 319 dwellings pa. above allocation for Basingstoke and Reading, ie. an increase of 23.5% (17% for Basingstoke and 34% for Reading). Of itself, this would represent an increase of over 7% over the sub-regional total of 4,476 dwellings p.a. ie. an additional 6,380 dwellings over the life of the plan.

3.5 Any such increase based on the New Growth Point concept cannot be supported for Basingstoke, as a comparatively new post-war town with very little of the old town left. Consequently there is hardly any brownfield land in the town itself which could be re-developed, and little scope or need for regeneration. Furthermore, in 2006, the Inspector for the Inquiry into Modifications to the Local Plan agreed with the District Council in rejecting every case where developers and their agents identified alternative development sites. He also identified constraints of infrastructure, particularly sewerage, that led him to recommend deletion of the reference to an MDA on greenfield land, also deletion of other sites due to heightened commuting and a further restriction on development in floodplains.

3.6 Colloquially, Reading is already bursting at the seams. Congestion problems are legion, urban crime rates are high and the suburban hinterland takes up most of the area between the M4 and the central business district, also stretching far to the east and north. Policies for development of the Thames and Kennet floodplains are subject to both local and national review, while crossing points of the Thames are a recognised limitation. While rightly identified as a regional hub, there is limited scope to consider Reading as a growth point, unless there is a step-change in infrastructure, including Airtrack and Cross-Rail.

3.7 If these examples represent the preferred means of achieving further development in the sub-region, they amply illustrate why there is such little scope to identify options for growth that have not already been explored.

3.8 CPRE notes that it is not part of the regional brief to be site-specific as to development possibilities, and trusts the panel will disregard untested proposals or generalisations that are more appropriate for the LDF procedures of local authorities.

8Jii.4 Bearing in mind the development pressures does Policy WCBV2 offer sufficient environmental protection?

4.1 A high standard of environmental protection is required across the South East, particularly in the sub-regions. Policy WCBV2 properly recognises the need for environmental constraints on development, but this specifically relates only to protection in the event of incursions from urban extensions. In practice, the whole thrust of sub-regional policies will lead to other incursions into valuable countryside, because developers look to greenfield opportunities, mainly because the sites can be so much easier and cheaper to develop than brownfield.

4.2 It is a weakness of SEP that no particular environmental protection policies are in place for valued landscape or countryside outside nationally designated areas. Policy C3: Landscape and Countryside Management, only says that management of countryside ‘outside nationally designated landscapes’ *‘should be encouraged ... to protect and enhance its distinctive qualities...’* etc. In this respect, Policy WCBV2 is an improvement on the core policy.

4.3 In the context of Q 8Jii1, CPRE said that in addition to international, national and regional countryside designations, important local land designations are on such a scale that no one map would readily indicate the extent of the sub-region warranting environmental protection. The panel is asked to urge the retention of all local designations under SEP that represent a proper constraint on development in the countryside, and to endorse:

- International, National and Regional recognition of: Green Belts, AONBs, National Parks, Regional Parks, SPAs, SSSIs, Strategic Gaps, playing fields, allotments, forests/woodlands etc; also including designated commons, countryside and floodplains etc.
- County and Local Authority recognition of: Country parks, wildlife heritage sites, local nature reserves, local gaps, landscape character areas, amenity land, village greens etc.

4.4 Under 8Ji CPRE outlined concern about arbitrary sub-regional boundaries. It is essential to find better reasoning for both the location and the alignment, primarily for reasons of environmental protection and community cohesion. As a case in point, the Western Corridor Composite Response (q.v.) articulates widely-held opposition to the alignment of the sub-regional southern boundary because unless this is revised, rural parishes and communities in a recognised area of high geographical importance will be divided and potentially subject to sub-regional development proposals. No such reaction followed publication of SEERA’s earlier maps that showed the M3 as its preferred boundary.

4.5 A similar outcry greeted the unexplained re-alignment of the boundary between Basingstoke and Newbury by the Regional Assembly. Originally shown co-aligned with the A339, the present variation fails to respect the A339 as the boundary, bringing a large part of the North Wessex Downs AONB within the sub-region together with a number of rural parishes of established high landscape value.

4.6 In all such cases, in this sub-region and elsewhere, the Panel is asked to appreciate the risks of leaving it up to disparate LDFs of varying calibre to safeguard principles for protecting the environment; opening the door to policy variations that sustain Planning Appeals rather than appropriate development. The Panel is asked to recognise the opportunity – necessity – for a rational, transparent boundary review allied to more responsible SEP core and sub-regional environmental protection policies.

END

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