
Local Plan Part 2: Examination Hearing Statement

Matter 9: Policy NA1 – NA3

Savills on behalf of Alfred Homes (51580)



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1. Introduction

- 1.1. This Hearing Statement addresses Matter 9, and the two questions posed in the consideration of the soundness of Policies NA1 - NA3, namely, are the policies and proposals for growth and change in this area appropriate and justified, including in relation to the NPPF, and in terms of environmental, economic and social impacts? And, are they clear and deliverable, including in respect of the associated infrastructure requirements? The questions are taken in turn, cross referring back to the Pre-Submission Statement and appendices submitted by Savills, the evidence purported to support the spatial strategy, and the tests of soundness against which the Policies are being judged.
- 1.2. Matters concerning the robustness of the SA assessment in relation to New Alresford are provided within the further written response to Matter 1, and crossed referenced within this Hearing Statement.
- 1.2. The Hearing Statement concludes with recommended wording of how the Policy can be made sound.

2. Are the policies and proposals for growth and change in this area appropriate and justified, including in relation to the NPPF, and in terms of environmental, economic and social impacts?

- 2.1. The spatial strategy for New Alresford is predicated on a series of assumptions made by the City Council very early in the production of the LPP2, around which the Council's submitted evidence base, SA and Policies NA2 and NA3 have been formed.
- 2.2. Central to the Council's spatial strategy, is the presumption of a need to deliver a new commercial employment site within the Town, and thereafter, in order to deliver the new commercial site, to link this to a significant housing allocation and a new Junction to the A31 (NA3). The evidence that underpins both the need for this commercial allocation within NA3 and the deliverability of the resultant need for a new Junction to the A31, are therefore core elements to the Plan and whether the spatial strategy for New Alresford can be considered justified, and thus sound.
- 2.3. Within its report to Cabinet in October 2015 (Examination Library WCC4), the Council advocates its approach in working with the Town Council in preparing an evidence base against which the strategy for the Town has been formed. In doing so, the Report also acknowledges a previous error made by the City Council in the population projections for New Alresford, against which evidence had previously been prepared.
- 2.4. This error resulted in the reconvening of the Employment Needs Group Report, a report from which is included within the Examination Library (EBNA13), and which concluded that in light of this error, the need for a new commercial site was not supported based upon the best available evidence. It is of particular concern that the City Council chose to dismiss the findings of that addendum (Para 21 and 22 Appendix N), and moreover, not prepare an updated employment needs study to justify its approach included within LPP2 given the influence the employment allocation had over its spatial strategy.
- 2.5. At present, the SA recognises the negative effects of the Council's proposed loss of employment at The Dean (NA2), which in our view, is not countered by any substantive evidence to show that the new commercial allocation within NA3 will come to fruition, or indeed, is the best location and strategy in respect of environmental, economic and social impacts, given no alternatives, including the retention of existing employment sites, have been provided for comparative purposes within the SA.
- 2.6. The lack of evidence to support the commercial allocation is evident within the Policy wording and supporting paragraphs of the Local Plan itself, where Para 4.5.20 and the second criterion under 'Nature & Phasing of Development' cites that 5 hectares will be allocated for business

use and access, whereas, the opening of Policy NA3 requires the delivery of 5 hectares of employment uses (B1, B2 and/or B8).

- 2.7. It is not known therefore how much land/ commercial floorspace the City Council considers necessary, to meet the future employment needs of the Town, a position symptomatic of a lack of evidence to justify the element of the Policy.
- 2.8. Linked to Policy NA2 and the redevelopment of existing employment land within The Dean, there is a high risk that not only will established employment land be lost, but thereafter, the commercial allocation at NA3 will not come to fruition, resulting in a net loss of employment within the Town.
- 2.9. Moreover, to be considered justified, the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. As set out in response to Matter 1, the evidence base and SA that the Council uses to seek to justify its spatial strategy, contains errors in the context of site 2552. These errors, including the assertion that its development would result in the loss of sports pitches, have been highlighted to the Council on numerous occasions during the Plan production, and yet, remain within the SA, resulting in a negative effect being reported in the context of site 2552. The correct position is that the pitches have recently been provided to the north of site 2552 (land controlled by same landowner), and thus the reporting of the loss of such pitches and the resultant negative effects reported in the SA, distort its findings.
- 2.10. This error is further compounded by the weight the City Council gives to a non-designated Parks & Garden designation that applies to Arlebury Park, and to which the City Council has scored Site 2552 negatively against, despite not providing any evidence that shows either the extent of this non-designated asset, or how it would have a negative impact.
- 2.11. On the contrary, as per the Pre-Submission representation (Appendix 1), a Heritage Assessment has been produced and submitted in evidence to support the delivery of site 2552, within which Historic mapping shows that site 2552 has always been in use for arable farming, and has never formed part of the gardens associated with Arlebury House.
- 2.12. The importance of this assessment of heritage impact in the context of the SA cannot be overestimated, given that in all other respects, Site 2552 scored 'green' against all other criteria, with the exception of heritage, where it scored amber. Coupled with the erroneous position that the site's delivery would have a negative effect on the provision of sports pitches, means that the policies and proposals for growth and change in New Alresford cannot be considered justified, and thus, cannot be concluded at this stage to be appropriate.

3. Are they [Policies NA1 - NA3] clear and deliverable, including in respect of the associated infrastructure requirements?

- 3.1. In respect of whether Policy NA2 can be considered **effective** and thus deliverable, the site has multiple land ownerships and no joint working arrangement or equalisation agreement, in respect of the redevelopment of the land. In the context of the allocation proposing both high and low value uses to be delivered (residential through to public car park), in the absence of a joint approach and cohesive masterplan, it is not realistic that the Policy as set out will be deliverable.
- 3.2. The fragmented approach to this site is already evident in the submission of a Planning Application for 49 extra care units (15/02944/FUL) within the southern half of the allocation, which does not pay regard to how the remaining components of the allocation will be delivered. As per Section 4 and Appendix 5 of the representations submitted by Savills at the Pre-Submission stage, it is also the case that when calculating the eligible dwellings for CIL and tested at Examination, these C2 units were not considered by the City Council to be deductible from the 12,500 housing requirement to be delivered during the Plan Period.
- 3.3. The allocation of The Dean via Policy NA2 is inherently linked to Policy NA3, and the assumption made by the City Council that existing employers at The Dean will relocate to Sun Lane. There is of course no guarantee this scenario will occur, as it will be a commercial decision where the existing employers at The Dean relocate, and as already witnessed, there is very little if any control over Policy NA2 being delivered in full and in a cohesive manner.
- 3.4. With regard to infrastructure and deliverability, by far the most pertinent is the new junction to the A31, from which the Council's spatial strategy follows from. If not deliverable in a safe manner, then it follows that the employment land cannot be delivered, and the delivery of both Policies NA2 and NA3 is materially affected.
- 3.5. In this context, we refer the Inspector to the representation of Hampshire County Council at the pre-submission stage, and specifically the following bullet points:
- *HCC does not object in principle to a new access from the A31 Alresford Bypass provided that traffic impacts on the A31 and within New Alresford (particularly residential roads) are assessed to demonstrate that the impact on the highway network is acceptable or can be suitably mitigated*
 - *Development will need to overcome the restricted width, on-street parking and little or no footway provision for Sun Lane north of the railway bridge*
 - *Limited pedestrian access but also that for cycling to and from the town centre*

- 3.6 It is evident that significant questions remain unanswered in the context of the evidence base that underpins the suitability of this access arrangement, and the potential for it to be delivered in a safe manner.
- 3.7 Throughout the production of the LPP2, Savills and i-Transport have questioned the deliverability of this junction in a manner that would comply with guidance (see Appendix 2 of Pre-Submission representation), with the Systra Report of August 2015 (EBNA3), seeking to provide further evidence on the potential arrangements for this junction.
- 3.8 As summarised within the Systra Report, neither a priority junction, roundabout nor full grade separation would be entirely appropriate in this location. In respect of the latter, a full grade separation has historically been put forward by the promoters at Sun Lane as the preferred approach, however, as per the conclusions of the Systra Report, *'Such layouts are usually used for high capacity dual carriageway routes. Whilst not precluded under DMRB guidance, full grade separation is not normally recommended for single carriageway roads. This is partly because flow levels on single carriageways generally do not justify this level of provision and partly due to the risk that drivers may misinterpret the highway layout due to its resemblance to a dual carriageway'* (Para 3.3.6).
- 3.9 Following the publication of the Systra Report, an analysis of the two remaining options cited within the Report, namely a compact grade separated junction or a local grade separated junction, was assessed by i-Transport.
- 3.9 Compact and local grade separated junctions both utilise left-in/ left-out junctions linked together with connector roads passing over or under the main carriageway. The principal difference between the schemes are that compact grade separated junctions use lower design standards for the connector roads. They therefore require less land as they are designed to cater for less traffic. As per the following analysis and drawings appended to this statement (Appendix 1), it is not considered that there is sufficient land that is understood to be in the ownership of the promoter of the Sun Lane development, to provide for a compact grade separate junction.
- 3.10 The guidance on compact grade separated junctions is contained within Technical Directive (TD) 40/94 and advises at paragraph 6.27 and 6.28 that for junctions *'...entries and exits with the mainline shall be based upon the standards contained within TA20 (DMRB 6.2) modified to remove all right turn manoeuvres associated with the mainline traffic The modified junction layouts for the left in, left out junctions are indicated in Figure 6/2.'*
- 3.11 Figure 6/2 of TD 40/94 identifies that the radii for the connector road cannot be introduced for a distance of 40m from the channel of the trunk road. This is to allow for the road to taper back to normal width. This introduces a length of straight road of 20m between two different curve radii. TD 40/94 goes on to advise at paragraph 6.8 that for the connector roads *'Horizontal radii shall comply with Table 6/1. In normal circumstances the Desirable Minimum Radius should be used'*, which in the case of Table 6/1 is 40m.

- 3.12 As submitted within Appendix 2 of the Pre-Submission representation and appended as Appendix 1 to this Statement, drawing ITB9194-GA-008 provides for this arrangement and demonstrates the connector roads on the southern side of the A31 that would provide access to the westbound carriageway, would require land that is to our knowledge not in the control of the site promoters at Sun Lane, raising the question of deliverability.
- 3.13 Paragraph 6.8 of TD 40/94 does advise that '*...in difficult circumstances a Relaxation of one design speed step may be used at the discretion of the Design Organisation,*' which would mean a radii for the connector roads of 32m as per Table 6/1 of TD 40/94, and shown within Drawing ITB9194-GA-007. Even with this reduced radii and relaxed standard applied, it would still require land that is to our knowledge not within the control of the promoter at Sun Lane.
- 3.14 In addition, this form of junction would require a number of side road connections to be taken directly from the connector road to the A31. That is, two accesses would be required to the existing length of Appledown Lane, and also one access required directly to a single residential dwelling. Whilst private accesses are not precluded by TD 40/94, the number of accesses over a short distance in this instance would introduce the opportunity for vehicle conflict and an increased risk of accidents.
- 3.15 To summarise the position in respect of the access to the A31, both i-Transport and the Council's advisors conclude that Full Grade Separation would not comply with standards, as these forms of junction are discouraged on single carriageway roads, and a number of departures from standard would be required. Moreover, both also agree that a priority junction and a roundabout would not be appropriate.
- 3.16 This leaves a compact grade separated junction, which would require less land take than the other feasible option of a local grade separated junction, but even then, as per the drawings contained within Appendix 1, would mean that land beyond that understood to be in the control of the promoters would be required.
- 3.17 While the Local Authority's position is that the precise details of this access will be considered at the Planning Application stage, as per the response from HCC and indeed the Council's own Transport Evidence base, it cannot be said that the infrastructure requirements to support Policy NA3 have been shown to be deliverable. Moreover, the evidence prepared by i-Transport shows that this is a very complex junction arrangement, and one that cannot simply be assumed to be deliverable and comply with standards to the satisfaction of the County Council. In the absence of such information, the Plan cannot be considered sound.

4. Summary

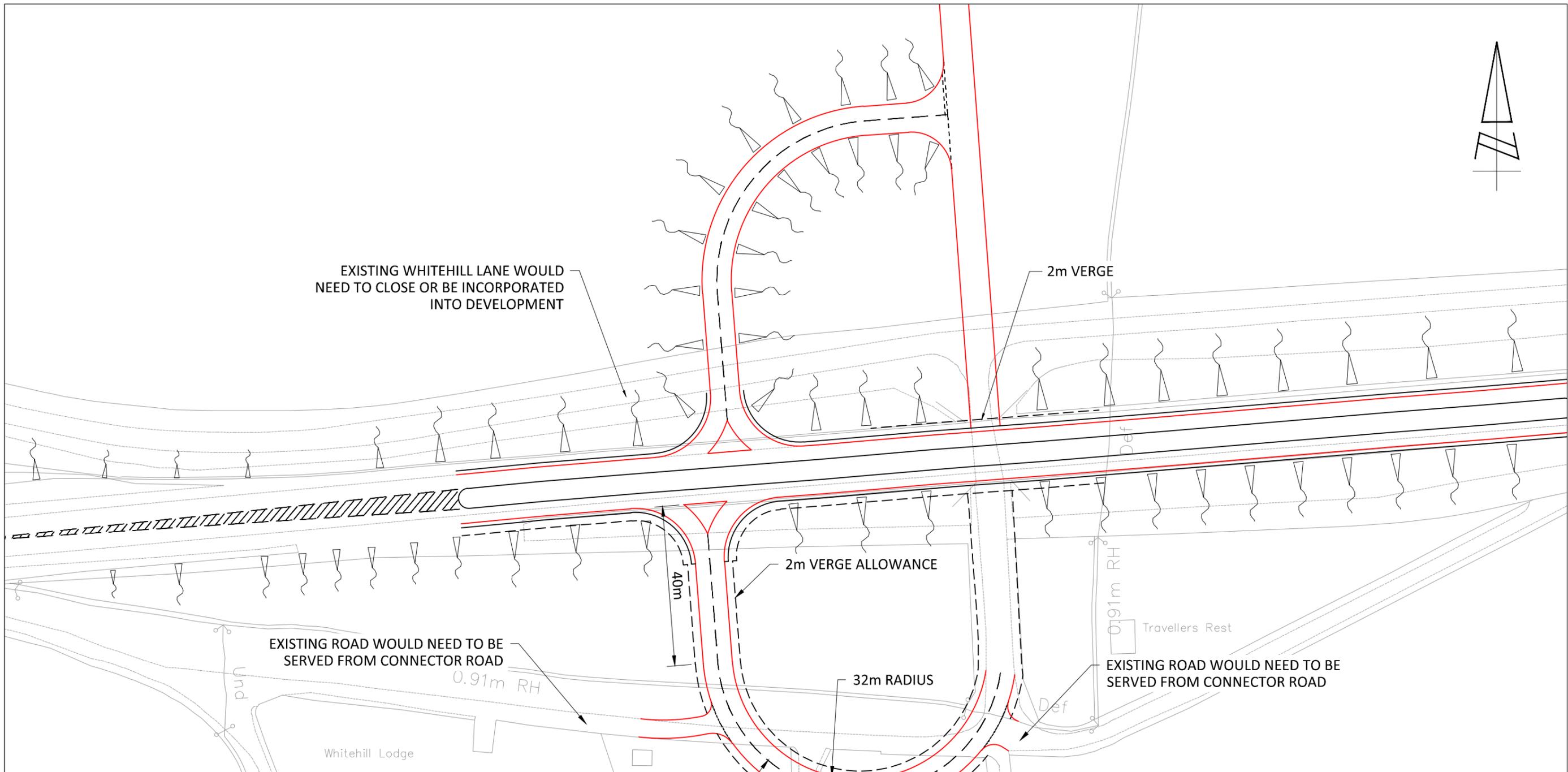
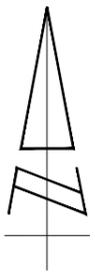
- 4.1 The proposed spatial strategy for New Alresford is neither considered justified or effective in the context of the tests of soundness. Much of this failure to prepare a sound strategy for the Town emanates from a well documented desire of the Local Planning Authority to have a concentrated strategy of delivering nearly all of the future housing requirement and employment land within a single site, around which it has sought to prepare an evidence base.
- 4.2 Throughout the production of the SA, erroneous statements have been included in the assessment of Site 2552, which despite the Council having been made aware, remain in the SA and thus present a false position upon which judgements have been made. This is further compounded by a lack of substantive evidence to support claims within the SA, namely the impact on Heritage by site 2552, which has been countered by a comprehensive Heritage Report submitted.
- 4.3 While the outputs from an SA are a matter of judgement, its inputs must be factually correct in order to be considered robust and justified. If not, then a thorough and accurate assessment of the alternatives cannot have been deemed to have taken place. Further details concerning Savills assessment of site 2552 against the SA objectives, is provided within the Pre-Submission representation.
- 4.3 The robustness of the evidence base can also be questioned in the context of employment needs, and the dismissal of the Local Needs Group addendum by the City Council that questioned its merits. Given the employment allocation within Policy NA3 is central to the whole spatial strategy, we question why there is such a lack of evidence to support its need, particularly in the context of the consideration of any alternative strategy of investing in existing employment sites within the Town. This lack of clarity finds its way into the Policy wording itself, where it is unclear whether the Council is expecting 5ha of employment land, or the 5ha to also include land for an access. To be robust, we would expect the evidence base to be clear in this regard, which at present it is not.
- 4.4 In order to make the Plan sound, it is considered necessary that a robust assessment of the deliverability of infrastructure (A31 Junction) is undertaken, in combination with an updated SA that presents clear comparisons between the positive and negatives of the alternatives, based on factually correct information. It is our considered view that this would demonstrate an alternative, dispersed strategy for the delivery of new homes and employment within the Town to meet the requirements of the LPP1, inclusive of new housing and public car park at site 2552, would be shown to be the most appropriate strategy. In the absence of such an evidence base and robust assessment, we contend that the Plan fails to meet the prescribed tests of soundness as set out.

END

Appendix 1:

Drawing ITB9194-GA-008

Drawing ITB9194-GA-007



EXISTING WHITEHILL LANE WOULD NEED TO CLOSE OR BE INCORPORATED INTO DEVELOPMENT

2m VERGE

EXISTING ROAD WOULD NEED TO BE SERVED FROM CONNECTOR ROAD

2m VERGE ALLOWANCE

40m

32m RADIUS

EXISTING ROAD WOULD NEED TO BE SERVED FROM CONNECTOR ROAD

Whitehill Lodge

Travellers Rest

NOTE:

DRAWING INDICATIVE OF POTENTIAL JUNCTION LAYOUT. DRAWING BASED ON SITE OBSERVATIONS OF GROUND LEVELS AND CONDITIONS.

CONNECTOR ROAD ASSUMED TO REQUIRE THIRD PARTY LAND

CONNECTOR ROAD ASSUMED TO REQUIRE THIRD PARTY LAND

EXISTING ACCESS WOULD NEED TO BE SERVED FROM CONNECTOR ROAD

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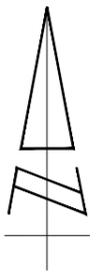
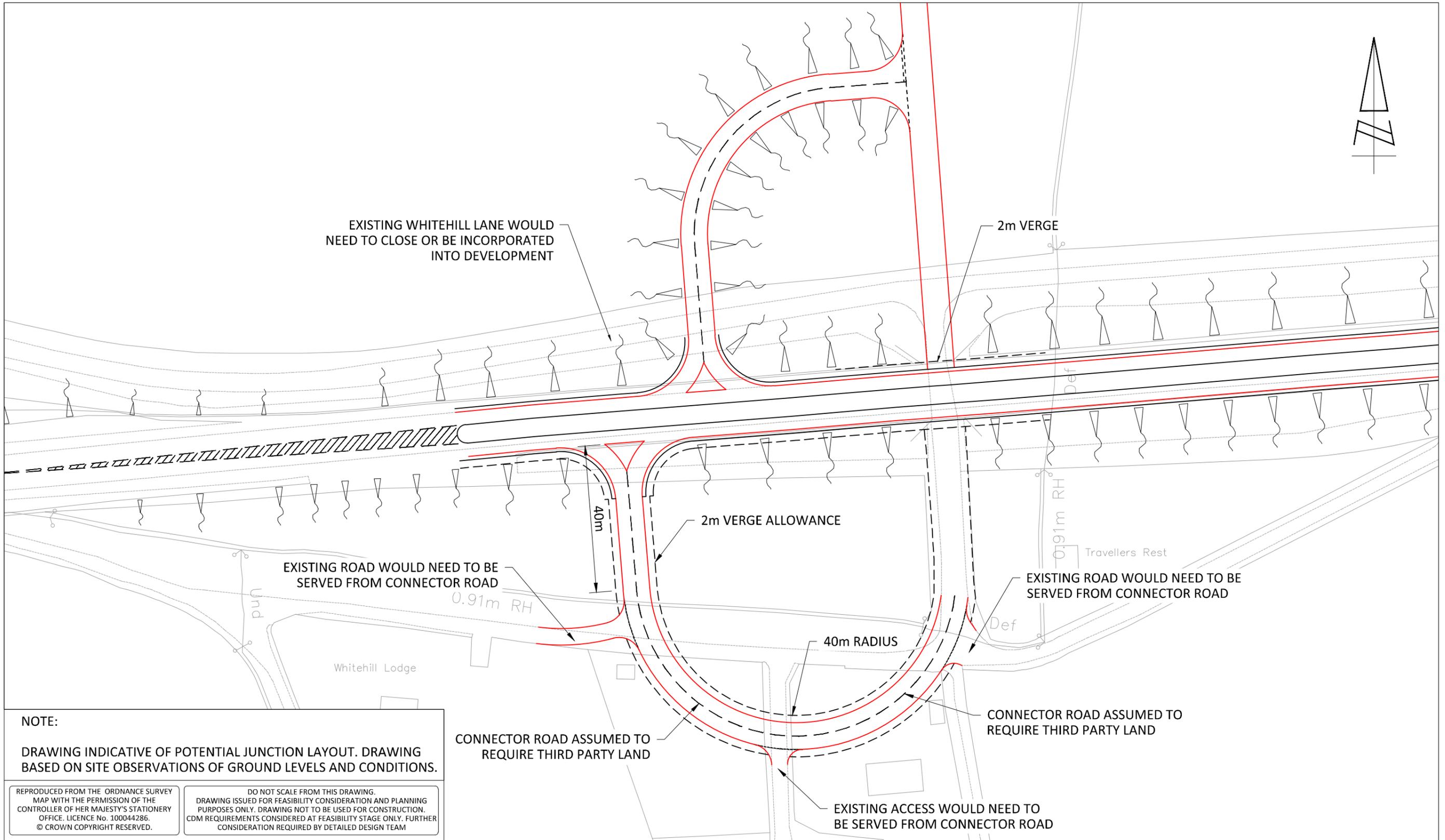
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REV	DATE	BY	DESCRIPTION	CHK	APD
			ISSUE		

TITLE:	LOCAL GRADE SEPERATION (32m RADII CONNECTOR ROAD)	
PROJECT:	ARLEBURY PARK, ALRESFORD	CLIENT: ALFRED HOMES

DRAWING No:	ITB9194-GA-007	
PROJECT No:	ITB9194	REV:
SCALE @ A3:	1:1000	CHECKED: BH
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	DRAWN: SH	DATE: DEC 2015



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REV	DATE	BY	DESCRIPTION	CHK	APD
			ISSUE		

TITLE: LOCAL GRADE SEPERATION (40m RADII CONNECTOR ROAD)	
PROJECT: ARLEBURY PARK, ALRESFORD	CLIENT: ALFRED HOMES

DRAWING No: ITB9194-GA-008	
PROJECT No: ITB9194	REV:
SCALE @ A3: 1:1000	CHECKED: BH
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