

**BENTLEY ACTION GROUP**  
**OPPOSITION TO NORTHBROOK PARK DRAFT ALLOCATION**

**ADVICE**

*Introduction*

1. This Advice confirms views I expressed to members of the Bentley Action Group (“BAG”) in consultation on 20 June 2019.
2. BAG has made representations to the Regulation 18 consultation on the East Hants Local Plan 2017-2036, focused on the potential allocation of a large site known as Northbrook Park (draft allocation SA21), which lies either side of the A31 in the north of the East Hants Local Plan area, adjacent to the Farnham area of Waverley District.
3. The main advice I have given and set out again in this Advice concerns two points:
  - (1) The merits of the BAG representations in respect of Northbrook Park; and
  - (2) The potential range of outcomes through the Local Plan process, and tactical and contextual issues arising from them.

*The merits of the BAG case*

4. Northbrook Park is a draft allocation for 800 new homes, employment land and related infrastructure including 34 hectares of SANG land or public open space. It is described as a “new settlement”, though as I comment below, that label may be inapt.
5. In its comments on the draft Local Plan, BAG drew on work carried out for it by Carter Jonas, and identified the following concerns:

- (1) Alternatives exist which are preferable in locational terms. These include Chawton Park, close to Alton. Northbrook Park is criticised as being isolated, with poor public transport links. The greater burden on local roads, and on parking capacity at Bentley and Farnham railway stations are also noted.
  - (2) The relationship between Northbrook Park and Bentley (and its existing facilities) is unexplained and there is at least the potential for harm to the latter.
  - (3) Traffic impacts would affect the Coxbridge Roundabout and the Farnham Bypass, exacerbating the effects already felt from the Whitehill/Bordon development.
  - (4) Environmental impacts from the development of Northbrook Park would be considerable – views from the South Downs National Park, within the Northern Wey River Corridor, heritage aspects, ancient woodland and sites of biodiversity value. The Northbrook Park development would be a relatively dense and urban environment which is likely to exacerbate these effects. There are also considerable challenges to be overcome relating to the effective disposal of waste water, and parts of the Northbrook Park development are subject to flooding constraints which at this stage have not been fully explored or resolved.
6. Having looked at the relevant material and discussed the points to some extent, I consider all of these points to be well made. In my view the strongest objection to the Northbrook Park allocation is on overall sustainability grounds, given (a) its awkward location divorced from any existing settlement yet near Farnham, and (b) the ownership restrictions which give rise to a development which is too small properly to function as a ‘new settlement’. I have no qualms in supporting the main BAG case in these respects.
  7. I have also reviewed the Interim Sustainability Appraisal (“SA”) of the emerging Local Plan (AECOM, December 2018), and consider that a rather more technical case could also be mounted against the emerging Northbrook Park allocation, based on what in my view is an inadequate assessment both of the site itself, and of reasonable alternatives. I do not think that the narrative section entitled *Establishing the preferred option* (pages 11-13) sets out with sufficient clarity what weighting is given to various relevant objectives. This is potentially a legal failing with the SA and the emerging Local Plan

which I would expect to be addressed by East Hants. However, experience shows that often a preferred option, once it gains political support, is justified retrospectively in such documents. For this reason, I would advise that the retained experts acting for BAG continue to scrutinise and interrogate the SA as the plan-making process moves forward.

8. I note that the representations thus far made by BAG have been consciously balanced and have not sought to overstate opposition to Northbrook Park. This has perhaps been influenced by concerns about the negative consequences of *succeeding* in an objection to Northbrook Park, namely substantial accretions to Bentley itself. I deal with that point below, but at this stage observe that it would be entirely justified to take a rather harder line in future representations.

*Tactical and contextual issues*

9. Much remains unknown about the likely outcomes of the East Hants Local Plan process. The housing numbers which the District Council are planning for are likely to undergo some change in the next 6-12 months due to the ongoing development of central Government planning policy for housing, for instance.
10. The plan remains at a very early stage. It is unclear whether the views of Farnham Town Council (expressed in opposition to the potential Northbrook Park allocation) will lead to a change of direction.
11. Nor at this stage can one reasonably predict the ongoing effect of an allocation – or absence of allocation – at Northbrook Park. The potential housing sites which have been identified (including 13 in and around Bentley) are clearly not all to be equated with potential housing sites; and Northbrook Park's 800 residential units are plainly insufficient to generate critical mass needed for successful internalisation effects (such as the retention of school, shopping, leisure and employment trips within Northbrook Park); the upshot may or may not be a continued growth of Northbrook Park beyond the current proposed allocation.

12. This is an important point. I have seen the communications from the Northbrook Park agent dated 18 December 2018 suggesting that Northbrook Park will meet housing needs such that “pressure for future development within or adjoining the village will be significantly reduced”, and also a letter addressed to Parish Councillors in Bentley dated 14 March 2019, suggesting that Northbrook Park may be “the lesser of two evils” by contrast with what is described as a “high risk of multiple housing developments” (evidenced by reference to the 13 sites in the Land Availability Assessment of December 2018).
13. There is no real force in either suggestion. Northbrook Park, were it to be constructed, may not reduce the pressure for additional sites to be added to existing villages. I would observe that the National Planning Policy Framework 2019 at paragraph 72 makes no distinction between bringing new housing forward in new settlements or by extending towns and villages. It would not be a safe assumption at this stage that Northbrook Park would somehow ‘insulate’ Bentley from development pressures. I am told that District Council refuses to give any form of guarantee that any site or sites will not be identified and brought forward to meet housing needs, if Northbrook Park is allocated. There can be no such guarantee, even if Northbrook Park does go ahead, because circumstances (including levels of housing need, and planning policy at all levels) change over time, and planning applications must always be dealt with on their own merits at the time they are determined. Any such assurance would not be reliable, even if given.
14. On the other hand, the 13 sites in the Land Availability Assessment have no policy status – they are merely sites which have been put forward by owners or potential developers. From work carried out by Carter Jonas on behalf of BAG, it is likely than the majority of the 13 sites will prove to be undeliverable. It follows that the notion of a swarm of Bentley housing developments due to the absence of Northbrook Park is also unlikely to be borne out.
15. If the Northbrook Park draft allocation does not proceed, the consequential modifications which might be recommended by the local plan examining Inspector are hard to predict with certainty. If, for instance, the examining Inspector forms the view that the District Council has failed properly to carry out the examination of all ‘reasonable alternatives’ as part of the SA of the draft plan, the likely outcome is that

the plan will either be withdrawn, or subject to a lengthy delay whilst the SA is carried out again. The pattern of development which then emerges could be very different from that in the current draft plan.

16. It is not necessarily the case that the District Council will, whatever the reason for a notional withdrawal of the Northbrook Park allocation, turn to a more ‘dispersed’ housing strategy. From my reading of the SA, and the representations made on the draft plan’s early stages, my view is that a ‘fallback’ to Northbrook Park is likely to be in the form of greater numbers around the District’s main centres, rather than an approach which spreads housing numbers around all settlements above a certain size in the District.
17. For these reasons, it seems to me that the most effective way for BAG to interact with the Local Plan making process would be to intensify its scrutiny of the SA and any emerging Northbrook Park proposals.

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