

REVIEW OF THE PORTSMOUTH ESTATE - UPPER SWALLICK GARDEN COMMUNITY PROSPECTUS

ISSUED ON BEHALF OF STaNHHD

EXECUTIVE SUMMARY

The Prospectus for the proposed Upper Swallick Garden Community produced for The Portsmouth Estates has been reviewed to assess the credibility of the case made for considering the development as a future candidate to meet B&DBC housing needs.

This document examines the text in detail and illustrates the contradiction between the contents of the Prospectus and the real world as summarised below.

HOUSING NEED General

- There is no evidence to prove that the development is required to meet the housing need in the updated Local Plan up until 2038.
- Irrespective of the above, the proposed delivery extends to 2045/6 and should not be considered.
- The proposal ignores current B&DBC's policy which does not permit developments of this size and nature in the countryside.
- The proposal ignores evolving UK Government policy objectives which, post COVID, prioritises on the revitalisation of Town Centres, regeneration of urban and brownfield sites to protect the countryside.

HOUSING NEED Local

- Unsurprisingly, the document gives scant reference to the provision of social housing or any commitment in quantum terms.
- If the report were to have had any integrity, concerning the meeting of B&DBC housing needs, it would have considered the Council's Annual Review of the Housing Allocations Policy. This document was discussed at the Scrutiny Committee meeting on 22 September 2020 and contained the following data.

Applicant's Minimum Bedroom Requirements as of 31 March 2020	
Applicants Requiring Single Bedroom Accommodation	3,143
Applicants Requiring Two Bedroom Accommodation	782
Applicants Requiring 3,4 or more Bedroom Accommodation	581
Total Applications	4,506

- Hence, 87% of the social housing demand is for 1 or 2 Bed Units.
- It is universally acknowledged that for financial, practical, social, and demographic reasons, such accommodation is best provided via apartments local to major amenities i.e., within easy reach of the Town Centre.
- The Prospectus does not recognise this need for social housing in terms of location, and the type of buildings proposed, and the connectivity required.
- There is a complete mismatch between the vision and motives of The Portsmouth Estate in delivering this development and the actual housing requirements of the Town.

To determine the validity for locating a new residential development in the Countryside it needs to be compared with alternative solutions driven by Local & Government Policy to revitalise Town Centres. These prioritise Regeneration and Brownfield sites within the existing development area prior to further development in the countryside. This document notes the factors arising from analysing the Prospectus.

ENVIRONMENT

The proposed "Green Infrastructure Led Scheme" is less sustainable and environmentally friendly than Regeneration & Brownfield for the following reasons.

- The construction of new infrastructure outside of the development plan area.
- Failure to save embedded energy in retained buildings and infrastructure.

- Increased number and length of journeys to the amenities in the Town Centre.
- Tokenism of planting of new woodland to capture CO₂ will not reclaim carbon emissions associated with the above.
- The Garden Community destroys the countryside rather than the claimed “contributes to protecting and enhancing the natural environment” and delivers “Fantastic Bio-Diversity Gains and Environmental Gains”.
- The development encapsulates an historic village and buildings but claims to “respect built and historic environments”.
- No regard is given to the countryside amenity lost to the town. The proposed gain cannot compensate for the consequential loss of wellbeing the harm caused.

CLIMATE CHANGE

The proposals to tackle climate change, in the document are not unique to the Upper Swallick Development as the Prospectus seeks to imply. They will be mandatory under Parts 1A, F, G & H of Building Regulations which include the following.

- Low Energy Housing (Supported by SAP Calculation)
- Use of Renewable Energy
- Reduction of Water Usage
- Prevention of Overheating
- Surface Water Drainage

All future new build developments will need to comply with these irrespective of location.

TRANSPORT

- Extension of the transport infrastructure into the countryside is not transformational as claim for the following reasons.
 - 1) Journey lengths are extended to the central Town Centre amenities.
 - 2) New infrastructure is required outside of the current development plan area rather than enhancing existing infrastructure within it.
 - 3) The proposed Park and Ride solution for a remote 2500 home community is aspirational, but its delivery is hypothetical. Financing and regularity of service to displace car usage is highly questionable.
 - 4) Cycling solutions from remote locations do not solve travel issues during the winter.

JOBS

- There is no requirement for the remote Enterprise Hub proposed. The town has two existing hubs, located within the current B&DBC development area, at Basing View and Chineham Business Park.
- Commercial trends, space availability, and expansion opportunity within these hubs makes further provision superfluous.
- The hubs are well served by their location to existing transport connections.
- The above hubs already provide the networking facilities and technology to promote entrepreneurship, local to social and leisure amenities which are a catalyst to such activities.

CONCLUSIONS

In reviewing the Prospectus, it is fair to conclude the following.

- The proposed Upper Swallick development is not required and is contrary to Local and Central Government Policy
- The Prospectus does not address or consider the actual housing needs of Basingstoke & Deane Borough Council.
- That in each element the Upper Swallick proposals offer inferior solutions to those delivered in accordance with Local and Central Government Policy to revitalise Town Centres.
- There is no reason for the Basingstoke & Deane Council to consider the Upper Swallick Development until all alternative, post COVID, Regeneration and Brownfield site opportunities inside the current development have been thoroughly explored and their potential contribution to residential development understood.

SCHEDULE OF COMMENTS ON UPPER SWALLICK PROSPECTUS

Introduction

The credibility of the Prospectus produced to support the Upper Swallick Garden Community produced by Portsmouth Estates is open to challenge. The Estate has played a significant role in the development of Basingstoke since its expansion dating back to the 1960's. The Legacy it has helped to create is that Basingstoke has expanded whilst showing sympathy to the unique countryside setting in which it survives; and the Estate has been historically admired for the stewardship and maintenance of the surrounding countryside.

The future development of the Town has now reached a crossroads where decisions must be taken on how future housing needs are to be provided and how this best preserves the Legacy that has been created. This exercise is complicated by a confluence of the following events.

1. The Government's current review of the Planning Process, and in particular, the delivery of future housing developments, initially tabled as a White Paper in August 2020. This outlines a hierarchy to be followed in selecting future development sites which preserves the green belt.
2. The Government's clarification on the location of future housing requirements around the country.
3. The post COVID impact on future planning decisions and regeneration opportunities arising from the changed requirements of the commercial, retail, industrial and residential sectors.
4. An increased public awareness of Climate Change and the value of preserving and improving the natural environment.

There are conflicting tensions associated with each of these events that require a holistic view to be taken, incorporating each of these to ensure the most expedient outcome is achieved.

It is unfortunate that on this occasion, Portsmouth Estates have failed to take this view and appreciate the importance such an exercise has. It is a one-off opportunity to ensure that the correct decisions are taken on deciding how future housing needs are to be provided in Basingstoke. Instead, they have decided to submit a biased, opportunistic proposal which disregards all the above factors and is falsely supported by measures which do not stand up to scrutiny when viewed against other alternatives. These may be summarised as follows:

- **The Upper Swallick scheme is not required to meet the future 5-year housing requirements of the new B&DBC Local Plan. This is a situation that is likely to be further reinforced by a reappraisal over the next few years as development opportunities, arising from post COVID working practices and the rapidly expanding Digital environment, become apparent.**
- **The Upper Swallick scheme ignores the policy objectives of both Central and Local Government related to future housing development.**
- **The nature and location of housing proposed does not align with the current housing requirements of the Borough.**
- **The "Green Infrastructure" led scheme is deficient to those delivered by regeneration solutions supported by the recent Government White Paper.**
- **RIBA Statement on the importance of retaining buildings advocating the reuse of existing buildings.**

The above is discussed in more detail in the relevant sections below.

Quotations From Document	Fact Check
Introduction (Page 7)	
<p>1) “The proposal is for around 2,500 homes, employment opportunities, comprehensive community facilities and substantial open space. The Development will be green infrastructure led with improved biodiversity, natural capital net gains and long-term carbon capture.”</p>	<p>The credibility of the proposed “Green Infrastructure” which underpins the proposed development when further analysed can be shown to be fundamentally flawed when viewed against future housing needs and the alternative options to meet these in Basingstoke.</p> <p>The “Green Infrastructure” proposed to underpin the Upper Swallick development can be shown to be deficient when compared with sustainability and financial advantages derived from the Government led initiatives. These involve the use of Regeneration and Brownfield sites to deliver residential accommodation and capitalise on the following.</p> <ul style="list-style-type: none"> a) The reuse and enhancement of the existing transport, utilities and build environment infrastructure. b) Minimising additional number and size of trips generated by remote new developments. c) Improving the quality and provision of public realm and green space for the enjoyment of all. d) Enhancing central social and leisure facilities for the enjoyment of all. e) Delivering lower CO₂ emissions by retention of embodied energy in retained infrastructure and reduced construction works. f) Protecting the natural environment and habitat for the benefit of all. This retained asset can be further enhanced by additional carbon capture measures if a true sustainability agenda is to be followed. <p>Improved Biodiversity The assertion that a 2,500 home urban development and supporting highways and community infrastructure, attractively cloaked under a Garden Community label, offers improved biodiversity and net natural gains to the loss of 700 acres of valued countryside it destroys is erroneous. The destruction of agricultural land, range of natural habitats, and the valued recreation amenity it provides to Basingstoke, cannot be remotely compensated by the proposed Green Infrastructure Led measures.</p>
<p>2) “Travel solutions will focus on walking, cycling and public transport. There is a commitment to</p>	<p>The proposed travel solutions outlined are a consequence of the remote location of the development from the Town Centre.</p>

<p>improvements for those forms of movement between the Garden Community and the Town Centre, helping to deliver segregated cycling and mass rapid transport infrastructure serving both Upper Swallick and the existing rural communities, and those of Brighton Hill and Hatch Warren, providing improved linkages with the Town Centre and Rail Station.”</p>	<p>The vision that cycling provision, through all seasons, would be part of the solution to deliver the connectivity is unrealistic.</p> <p>Similarly, the concept of a mass transit system serving a remote site is not viable, when set against a continual reduction of both Council and privately run local bus services in the town.</p> <p>It is acknowledged that a sustainable mass transit system could be provided as part of a town-wide regeneration exercise, capitalising, and developing the existing infrastructure within the neighbourhoods of the current development plan. However, it would be hard to financially justify its extension to the remote catchment areas and to guarantee a regularity of service which would discourage car usage.</p>
<p>3) “Subject to Basingstoke and Deane’s update of its Local Plan, and subsequent planning processes, the likely timescale for the commencement of Upper Swallick Garden Community could be 2025/6 with final completions to be secured by 2045/6.</p>	<p>The updated Local Plan extends to 2038. It should be noted that The Upper Swallick development is not required to meet the housing requirements of the updated plan, nor does its completion (2045/6) fall within the delivery period.</p>
<p>Vision (Pages 10 & 11)</p>	
<p>4) “The last year has been difficult for many, but the growth in the number of Basingstoke residents coming to enjoy our Estate has been fantastic. One of the benefits of a new Garden Community is that it will allow more people to enjoy increased access onto our Estate at Farleigh Wallop and envisage that our green infrastructure plan will aid that, while achieving fantastic biodiversity and environmental gains. Personally, I have found it hugely gratifying to see us playing our part in enabling so many people to enjoy nature while addressing their physical and mental health.”</p>	<p>This comment is noted with interest as it acknowledges the enjoyment that the public derives from access to the Portsmouth Estate given that the only amenity it provides is the open countryside.</p> <p>The loss of this natural environment to the proposed urban development removes this amenity to the detriment of the town’s wellbeing and ease of access to a coveted asset.</p> <p>It is illogical to claim that the destruction of this natural countryside, will be compensated by the claimed “fantastic biodiversity and environmental gains” delivered by the development.</p>
<p>5) “Finally, at a time when at a local and national level there is a housing supply and affordability crisis and question marks over the quality of</p>	<p>This statement implies that there is a housing crisis in Basingstoke, based on an assumption that in producing its revised Local Plan, B&DBC will be unable to demonstrate a 5-year site delivery for residential units to meet</p>

new home design and construction, Upper Swallick offers something different. Housing and the built environment should be designed for the very long term; Upper Swallick is being delivered by a single owner whose time horizons match that, and whose social, economic and environmental ambitions support those of Basingstoke and Deane Borough Council and its strategic partners”

government requirements. **This is incorrect.** The recent “call for residential sites” exercise undertaken by B&DBC is currently being reviewed, as part of the revised Local Plan process. It is highly probable that this will confirm that requirement will be met by existing sites identified within the current development plan area.

It should also be noted that further opportunities for residential development will arise, within the current development plan area, from emerging Regeneration and Brownfield sites because of the post-COVID changes in commercial and retail working practices. This is a process which will take a few years to unfold.

In conclusion:

These opportunities must be reviewed and exploited before any consideration is given to developments in the countryside.

The conclusion from the above is that the Upper Swallick Development is NOT required to satisfy B&DBC future housing requirements.

In addition, the proposal does not align with; Current Government policy to.

- a. **Establish a hierarchy for selecting sites, prioritising the order in which they should be considered for development over a 10-year period.**

The Pillar 1 Strategy confirms the sequence as: Growth Areas, Renewal Areas and Protected Land (Green Belt)
(Planning for the Future, White Paper August 2020)

- b. **Convert more offices in high streets to bring more life into town and city centres** *(R Jenrick MP April 2021)*

- c. **To build on Brownfield sites first, prior to considering development in the green belt.** *(R Jenrick MP April 2021)*

- d. **Commitment to Protect an additional 400,000 hectares of Countryside.**
(B Johnson MP 28th September 2020)

- e. **RIBA Press (9th July 2021)**

Old buildings should be refurbished rather than demolished due to their embodied carbon and the pollution caused by constructing their replacement.

Local Government Policy

	<p>f. Current B&DBC Local Plan, Policy SS6 which strictly limits development in the Countryside.</p> <p>g. Promoting the reuse of Brownfield Sites and Redundant Employment Sites to build new Homes.</p> <p><i>Constituency Conservation Charter for North Hampshire. R Jayawardena MP 5. November 2019)</i></p>
6) “Under the ownership of one landowner thus avoiding protracted land assembly arguments and enabling early delivery of infrastructure and ongoing stewardship and governance”.	This item is not relevant as there is no requirement for the development site and the proposed delivery period falls outside of the new Local Plan
7) “Incorporating the principles of NHS “Healthy Towns”, taking account of increased need for independent healthy living, avoiding social isolation and employing healthy placemaking.”	This amenity can be more effectively met via revitalising the Town Centre and adjacent urban areas and via regeneration / brownfields site projects. This affords the opportunity to retain, enhance and “Build Back Better” to these parts. This option improves the quality of environment and amenities for all, whilst preserving the valued natural countryside for the enjoyment of the town residents.
8) Delivering local employment opportunities and a transport network that promotes walking, cycling, public transport and mass e-charging, both on street and on plot.	These considerations are more effectively met via redevelopment of the Town Centre and via Regeneration / Brownfields site projects.
9) “Delivering a commitment to walking and cycling improvements between the Garden Community and the Town Centre, helping to deliver the Local Cycling and Walking Implementation Plans’ (LCWIPs) objectives for the southern area of Basingstoke.”	These improvements are more effectively delivered via redevelopment of the Town Centre and via Regeneration / Brownfields site projects.
10) “Delivering a viable Mass Rapid Transit / Park and Ride into Upper Swallick, providing a functional integration with the Town Centre and railway station.”	See response to items 2 & 29.
11) “Enhancing the natural environment, with a comprehensive green infrastructure that includes a	It is unreasonable to claim that the loss of circa 700 acres of countryside and natural environment can be enhanced by the green infrastructure measures proposed. The

<p>significant amount of new woodland planting. The use of zero carbon and energy positive technology will ensure climate resilience. The proposed woodland planting has the potential to capture significant levels of CO2 per annum</p>	<p>planting of token woodland will do little to compensate for the additional carbon losses from the existing countryside and the additional emissions generated by the new remote site location, compared to the efficiency derived from the use of regeneration and brownfield sites. These capitalise on the retention and enhancement of existing infrastructure and, where applicable, the built environment. (See also response to item 1).</p>
<p>Vibrant & Sustainable Community. Pages (16 & 17)</p>	
<p>12) “Supports independent healthy living, avoiding social isolation and matching the built environment with healthy living.</p> <p>Fosters social and intergenerational integration.</p> <p>Locates homes within a 15-minute accessible, safe, and desirable walk to local services that reflect the community's needs and support its health, social and cultural wellbeing.</p> <p>Accommodates housing designed to meet the needs of all, regardless of income or background.</p> <p>Supports green spaces designed to have a powerful impact on reducing health inequality and social disadvantage.”</p>	<p><i>(General Comment)</i> None of these attributes are unique to a Garden Community development.</p> <p>With good modern design Regeneration and Brownfield sites can achieve all these objectives and offer the following advantages to a remote development:</p> <ul style="list-style-type: none"> • Improved opportunity for social contact. • Compatibility with the demographic needs with ease of access to retail, workplace and leisure spaces. • Reduced travel costs to residents. • Reduced infrastructure with associated energy and financial savings. • Delivery of enhanced public realm and green spaces in existing urban environments, for the benefit of all. • Retention of local countryside amenity for the enjoyment and wellbeing of the Town’s residents and future generations
<p>13) “Ensure the emerging Garden Community contributes to protecting and enhancing the natural environment.”</p>	<p>It is difficult to comprehend how the Green Infrastructure proposed in anyway compensates for the loss of circa 700 acres of valued Countryside.</p>
<p>14) “Respects existing built and historic environments”.</p>	<p>The proposals do not recognise the importance and contribution natural rural settings play in contextualising historic buildings and villages. The encapsulation of Cliddesden Village and its uniquely located school illustrates both the lack of respect for these valued assets and Town Planning at its crudest.</p>
<p>15) “Enhances biodiversity through integrated open space, landscape and surface water drainage strategies</p>	<p>It is disingenuous to propose that the loss of circa 700 acres of valued countryside can be replaced and enhanced by these measures.</p>

	The Prospectus also bares no reference to nutrient neutrality which is emerging as a major issue associated with Greenfield Developments.
16) “Provides a green framework for healthy lifestyles including exercise, mindfulness and food production.”	<p>It is totally misleading to claim that healthy lifestyles and exercise will be promoted to all by the loss of valued countryside and the easily accessed amenity it provides to the adjacent neighbourhoods and town.</p> <p>It is wrong to suggest that the proposal is mindful of food production when the development will result in the loss of circa 700 acres of productive agricultural which has been farmed over the centuries.</p>
Delivering a Diversity of Housing Choice (Pages 24 -29)	
17) “Homes will be provided through a diverse range of housing types and tenures. They will be built by a diverse range of providers, including local and SME housebuilders as well as creating opportunities for self-builders. Modern Methods of Construction (MMC) will be another feature”.	This paragraph confirms in principle how the scheme will be developed. Sites will be acquired from Portsmouth Estates on a competitive basis, by a diverse range of providers. Each will design and submit a planning application to B&DBC for approval. The document is not specific on the extent and scope the much-vaunted stewardship the Portsmouth Estates will have once site sales are complete. It is likely to minimal.
18) “The project will create mixed tenure homes and affordable housing that is “genuinely affordable” – generating accommodation opportunities linked to local incomes, thus widening the opportunities for home ownership or rental”	<p>It is of concern that the proposal does not include any reference to the current documented housing requirements as illustrated by the latest B&DBC Annual Housing Review 2019/20. During the period, a total of 4,506 applicants were on the Council Housing list for accommodation. Of these, 3,143 required a single bed unit and a further 782 required two bed units. In commercial and practical terms, such accommodation is best provided via apartment developments, ideally connected to major amenities, transport hubs and commercial workplaces as provided by the Town Centre. Reviewing this, in conjunction with the accepted need to regenerate and revitalise the Town Centre to reflect the post-COVID world, clearly the demands that both issues are best addressed together. This ensures that the solutions within the development plan area also contribute to the enhancement of amenities and the environment for the benefit of all.</p> <p>This illustrates the serious mismatch between the vision behind the proposed Upper Swallick development and the actual housing requirements of the Town.</p>
A Strong, Responsive and Competitive Economy (Pages 30 & 31)	
19) “Delivering an Enterprise Hub which will provide a making, designing and	Basingstoke Town Centre already has several designated Enterprise Hubs, the main ones being centred at Basing View and Chineham Business Park. These areas continue to

networking space for the community.”	be developed and regenerated and are conveniently located to the central transport hub a retail and leisure facilities in the Town Centre. A further Enterprise hub would therefore be superfluous to the Town’s requirements.
20) “Ensuring the best homes, facilities and high-speed connectivity for home working.”	It is acknowledged that the enhanced facilities described are essential for all new housing developments. The housebuilding market is already responding to these requirements which can be provided irrespective of the location of development.
21) “Providing a range of flexible spaces across the business spectrum.”	See comment above regarding the Enterprise Hub.
22) “Investing in creating an independent spirit, technology and enabling entrepreneurship.”	The development size does not have the critical mass to justify this statement. The Basing View and Chineham Business Park hubs already provide adequate opportunities for businesses and entrepreneurship to thrive.
Tackling our Climate Emergency (Pages 34 & 35)	
23) “In terms of low carbon and renewable energy options, most developments we see are generally focused on known technology. Portsmouth Estates advocates an agreed policy framework that provides flexibility for future and emerging technology. Key to that is the legacy development nature of Upper Swallick and its stewardship that will enable adaption over time as technology advances”.	This illustrates a lack of understanding of new and emerging technologies applicable to the housing market. Emerging technologies using heat pumps, solar arrays, battery storage compatibility etc are already being installed in the marketplace. Forthcoming amendments to The Building Regulations, will impose more stringent requirements for SAP calculations, overheating analysis, thermal performance of structures, water consumption etc. These are just a few of the parameters that will be imposed on the house building sector, and they will not be a matter requiring Stewardship by the Portsmouth Estate, but will be led by Government Statutory Regulation.
24) “However, from the outset homes and buildings will be built in a manner that is resilient to climate change, built to a high standard of low energy usage, water consumption and reduction in waste”.	This will be a Statutory Requirement on any new residential development.
25) “Green Infrastructure will be designed to be climate change resilient and designed to avoid risks associated with extreme rainfall events.”	This will be a Statutory Requirement on any new residential development.

<p>26) “The levels of proposed woodland planting have the potential to capture significant amounts of CO2. Woodland planting will commence well in advance of other development at Upper Swallick”.</p>	<p>This proposal seems laudable until it is viewed against the loss of CO₂ capture provided by the lost countryside and the additional CO₂ emissions expended developing a new site; compared with capitalising on the retention of embedded energy derived from alternative regeneration schemes. It is tokenism at its best. (See also comments on item 1 above)</p>
<p>Transformational Travel and Access (Page 38 & 39)</p>	
<p>27) “The aim is to provide a mix of land uses at safe, convenient and desirable locations within close walking and cycling distance to homes. The objective is to create a strong degree of trip containment with a reduction in the need to travel by car both within the site and externally.”</p>	<p>We would take issue with this comment. The remote location of the site from the Town Centre and its retail, leisure and commerce amenities increases the necessity for and length of trips, compared to urban redevelopment within the current Local Plan.</p> <p>Analysing the need for social housing (see item 18 above) highlights the priority for 1 and 2 bed units and is typically required by young people, starter families and elderly people. For this section of the population a close location to the Town Centre is of primary importance for practical, financial, and social reasons.</p> <p>Regeneration and Brownfield developments located within the current Local Plan Area can deliver these requirements and stimulate development and enhancement of the existing transport hubs connecting to the Town Centre. This would be to the advantage of the whole town. (See also comments in item 2).</p>
<p>28) “Upper Swallick is in close enough proximity to the centre of Basingstoke that it can fully link to its proposed bus rapid transit scheme, and therefore the project will incorporate priority routing for bus services within its design. In addition, our technical work is examining how Upper Swallick will integrate with the proposed Vision for Southwest Basingstoke and its homes, education, employment, and health facilities. The master plan will create a series of public transport hubs embedded in the new community to maximise walk and cycle catchments and ensure bus stops are in attractive and well used location”.</p>	<p>The Upper Swallick scheme fails to deliver the convenient amenities future residents require and consequently imposes additional travel requirements necessitating new remote transport hub(s). It is basically in the wrong place.</p> <p>The proposed reliance of an extended mass transit system addresses the increased travel requirements created by the location of the scheme is inefficient from both a commercial and sustainability perspective compared with local alternative brownfield and regeneration sites around the Town Centre which would tap into the existing transport infrastructure. (Also see comments in items 2 above & 29 regarding bus services).</p>

<p>29) “This holistic approach to placemaking will maximise bus usage and help prioritise sustainable transport over private car use. The design team are exploring the viability of placing a Park and Ride facility as a central part of Upper Swallick, integrated as part of the public transport network and central hub of the community. That facility would in turn serve those commuting into Basingstoke from the south of the town.”</p>	<p>The Park and Ride transport proposal is a hypothetical solution to an accepted problem caused by the remote location of the development. It is an aspirational rather than a realistic solution without any substance concerning.</p> <ul style="list-style-type: none"> a) Capital Funding of the scheme b) Public or Private Operation c) The viability of commercially operating a regular 7-day bus service, to serve a community of 2,500 houses, with the regularity that will entice residents not to use cars. <p>It should be viewed with great scepticism given the cuts to current bus services in the Borough by both the Council and private operators.</p>
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Possible Benefits to Both Existing and Future Communities (Page 43)

<p>30) “Protecting the character of rural villages by providing a diversity of housing delivery that helps meet the Borough’s housing requirements in a timely manner and avoids speculative planning applications throughout the Borough and appeal wins resulting from under delivery”.</p> <p>“For the same reasons it will assist with the defending of the exploitation of Town Centre ‘cramming’ and unwanted increases in density and loss of non-residential land uses.”</p>	<p>See item 14 response above.</p> <p>It is ironic that this proposal, which ignores the key considerations, scheduled in item 1, is of a similar speculative nature to that referred. It should be noted that under-delivery of housing numbers has not been a successful vehicle for recent Appeals on projects that harm the countryside, and this proposal warrants similar treatment.</p> <p>This comment indicates a complete misunderstanding of the Town’s housing requirements and disregards both Central & Local Government planning objectives regarding the provision of future housing development. These have a vision which will provide high quality housing, enhanced amenity and wellbeing via solutions that do not suit the current Portsmouth Estates agenda. This appears to have diverted away from the respected careful stewardship historically applied to its land development and to its retained countryside as the Town grew.</p> <p>It is now clear that the Estate is now focussed on securing opportunistic, unnecessary residential development within its countryside assets for its own benefit, rather than being a custodian of the natural environment and protecting it as a legacy to leave for future generations.</p>
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