



MATTER 2 EXAMINATION STATEMENT

**EUROPEAN PROPERTY VENTURES
(NORTH HANTS)**

REPRESENTOR 164

THE VISION AND STRATEGIC OBJECTIVES



This Statement for Matter 2 will seek to address the Inspector's Questions identified below:

1. Is the vision justified and consistent with national policy?
2. Are the strategic objectives justified and consistent with national policy?



Matter 2 – The Vision and Objectives

Introduction

1. Claremont Planning Consultancy Ltd previously provided responses to the Council's emerging Local Plan on behalf of European Property (North Hampshire) Ltd (EPV) to seek to boost housing requirements and recognise the need to ensure housing delivery within the district of Hart. The Plan fails at providing an appropriate development strategy to ensure that the identified need and growth can be met in a sustainable and deliverable method. The deletion of certain draft allocation sites and the inclusion of a revised development strategy that relies upon an unidentified new settlement at some point in the future, fails to establish sensible avenues for growth and in so doing is not able to fully identify appropriate directions of growth to secure those required or identify those aspects that are especially sensitive to development.
2. On behalf of EPV, Claremont Planning identifies that the emerging plan and its strategic approach to delivering development is unsound and fails to comply with the duty co-operate. The failure of the plan to distribute development in accordance with the advice of the National Planning Policy Framework and the documented evidence base means that the resulting plan is ineffective and fails to meet the test for legal compliance. Through these representations the failings of the proposed strategic approach will be identified, specifically in respect of the over-reliance upon approved windfall developments and large strategic growth proposals to deliver a consistent level of development delivery over the life of the plan period.

Delivery of Housing Numbers at Yateley

3. Yateley is identified in the emerging Local Plan's Settlement Hierarchy as a high order settlement, occupying the second category of that below the top tier which Fleet occupies. This indicates that Yateley is a suitable location for development given the existing service base at the town and as such reflects the requirements of sustainable development identified in the National Planning Policy Framework. Settlement Hierarchy's form the very basis of a development distribution strategy as to take full advantage of the existing development pattern of an area which reflects the functional and economic relationships of places. However, without a suitable or justified distribution strategy that makes use of the hierarchy as its fundamental component, then it cannot be effective in directing appropriate growth levels within this hierarchy and network of centres.
4. The Vision of the emerging Local Plan makes direct reference to how the Plan looks to ensure the ongoing vibrancy of the District's towns and centres as well as to ensure the delivery of the identified need over the Plan period. At present, with the removal of the site at Eversley Road at Yateley acting as an exemplary case, the strategy taken by the Plan cannot achieve this Vision if the Plan is to satisfactorily meet the identified requirement. Delivery of growth to a second to highest order settlement does not demonstrate an inappropriate approach to development that would establish a direction of unsustainable growth. Indeed, in previous drafts of the Plan the site under control by EPV was allocated but has been unjustifiably removed subsequent to this. Give than the principal for development at this location has been set through the initial drafting of an allocation on the site, the Plan's shift to its current development strategy away from appropriate development at Yateley fails to ensure satisfactory and sustainable development.
5. Furthermore, this shift in the development strategy, which inappropriately and overly relies on the delivery of two strategic allocations alongside windfall and existing commitments does not



demonstrate a fully realised development framework. A diverse variety of sites in terms of scale, location and type ensures maximum opportunity to secure delivery, rather than an over-reliance on one certain form of allocated site does not provide a robust or flexible strategy that can ensure delivery of sufficient housing numbers to meet the identified need. As such, the Vision in the emerging Local Plan cannot be justified, given that the strategy that is provided through the Plan is ineffective in providing appropriate, deliverable sites to meet the aspirations of growth as set forth in the Plan by the District Council.

SANG and Thames Basin Heath SPA Mitigation

6. A key theme to the emerging Local Plan for Hart District is the conservation of ecological and environmental assets arising from the Thames Basins Heath Special Protection Area which covers a substantial area of the District. Forming part of the strategic development policy of the Plan is the provision of SANG – Suitable Alternative Natural Greenspace to ensure that impacts of growth and development on the Special Protection Area can appropriately mitigated for by providing alternative open space for recreational use. This is a major consideration that the LPA must take into distinct account to ensure that the preferences for growth of the authority are sustainable and not significantly impact the Thames Basin Heaths.
7. Given the extent of development within Hart, the authority is of the view that the existing SANG in the district is at capacity and as such cannot accommodate any further development and population growth without causing cascaded negative impact on the Heaths. Therefore, new development within the District will need to demonstrate appropriate mitigation strategies, the mechanism of which will need to be through the provision of new SANG alongside existing development. The removal of the site at Eversley Road, Yateley is unjustified given that it is able to conform to the objectives of the emerging Local Plan, in particular;

“11. To protect and enhance the District’s natural environment, landscape character, water environment and biodiversity, including ensuring appropriate mitigation is in place for new development to avoid adverse impacts on the Thames Basin Heaths Special Protection Area (TBHSPA).”
8. Claremont Planning therefore request that the overriding policy is amended, reflecting the vision of the Plan, to include all criteria set out by Natural England, which clearly states that 2ha is sufficient space for SANG to operate successfully. The SC5 site could deliver a highly sustainable form of development with on-site peripheral open space/SANG or contribute through a S106 to the provision of a wider strategic SANG within the Eversley Gap, as being promoted by two parties. The resulting SANG could then act as a buffer preventing any perceived coalescence of the settlements. At present the proposed landscape gap designation is unjustified and contrary to the fundamental aims of only seeking to safeguard landscapes of value – whilst the Eversley Gap is a localised nuance that has risen due to NIMBYism rather than tangible impacts arising from development linking Yateley with Eversley.
9. It is suggested that the site at Eversley Road is reinstated as a housing land allocation which can come forward for development sooner than a proposed new settlement on land that is yet to be identified and acquired and therefore it seems unrealistic to assume the new settlement can be delivered in the next 5 years. The open space originally identified within the scheme Masterplan provided the necessary level of SANG and a circular route requirement, which has on a bigger scale the potential to provide route through to adjacent lands that are promoted as private SANG areas through this plan review process.



An Alternative Development Strategy

10. The focus of the Plan in the delivery of the two strategic sites at the new settlement at Hartland village and in the search area of Murrell Green/Winchfield is inappropriate given the existing network of centres within the District that have the suitable capacity to accommodate a greater extent of growth. It is generally recognised that a distribution strategy that ensures a more even balance of development across the District, taking advantage of existing patterns and preferences of growth, is the most appropriate strategy to ensure that development is as sustainable as possible, but also taking advantage of existing service bases and employment markets. But, given that the development strategy of the emerging Plan places inappropriate weight in the likelihood of the strategic sites coming forward, the strategy is undermined by the fact that variables that determine delivery can shift rapidly and significantly. If this is the case, the Plan's numbers should then be called into question especially as a robust supply cannot be guaranteed.
11. To ensure a more robust delivery strategy, the Local Plan should ensure that a greater number of sites across varying scales share identified across the earlier years to ensure that the Plan can meet housing need - as acknowledged in Objective 1 of the emerging Local Plan. Given the site under control by EPV North Hampshire was previously identified as an allocation as a mid-strategic site for delivery, and not removed through any fault of the site's suitability, the initial principal for the site's suitability for development had been established. However, since it has been removed in favour of a strategy focussing on windfall development, existing commitments and the two large strategic sites, the realisation of Objective 1 is not justified. Rather than wait for the sit to be delivered through an appeal route with the timescale delays and costs to all parties, the allocation of the site should be reinstated.
12. The site at Eversley Road (SHLAA 273-272 and draft allocation SC5) is ideally located immediately adjacent to the settlement boundary. A series of technical reports were prepared supporting development at this location including ecological surveys by the Council's consultants. The development would result in a logical expansion to the town to the west, the only area that can accommodate growth due to the restrictions caused by flooding and TBH SPA at all other locations. The failure to identify this site means that the insertions of paragraph 29 -30 are incorrect and the Local Plan policy has failed to account for a new SANG and suitable level of housing growth at Yateley, which is best placed to contribute to cross-boundary housing and environmental requirements. As such, it was unjustified to remove this site from the draft allocations when the Local Plan is suggesting a fairly low number of new homes across the plan period.
13. On behalf of EPV, Claremont Planning identifies that the emerging plan and its strategic approach to delivering development is unsound and fails to comply with the duty co-operate as well as the test of deliverability. The failure of the plan to distribute development in accordance with the advice of the National Planning Policy Framework and the documented evidence base means that the resulting plan is ineffective and fails to meet the test for legal compliance. The previous draft allocation SC5 should be reinstated with the adjacent Eversley gap identified as search area for the provision of strategic SANG. Land within the Eversley Gap and to the west at Eversley Cross are being promoted separately to provide SANG by CEMEX and Gawthorpe Estates, both schemes would have additional capacity of a level that would enable the Eversley Road site to be delivered. As such demonstrating suitable lands are available for delivery as SANG around Yateley and the LPA's decision to restrict growth at Yateley is as such unjustified.



14. The SC5 site was previously a draft allocation in the regulation 18 consultation and was therefore previously considered suitable for development. A series of consultant reports were prepared supporting development at this location. The development would result in a logical expansion to the town to the west, the only area that can accommodate growth due to the restrictions caused by flooding and TBHSPA at all other locations. It is unjustified to remove this site from the draft allocations when the Local Plan is suggesting a restricted number of new homes across the plan period. The Local Plan proposes a low number of homes to be delivered to 2032 at existing settlements, although recognising that future requirements will be of a much higher level sufficient to justify a new settlement. The Council are therefore acknowledging that many more houses are required than they suggest but they have no definitive plans for this New Settlement and yet they have deleted a highly sustainable draft allocation for 100 dwellings at Yateley.
15. Claremont Planning have demonstrated that the plan cannot be found effective, sound or legally compliant without further modification given the inadequacies surrounding the identification of strategic growth locations.

Word count: 2,035