

# Statement in Response to the Inspector's Matters and Issues for Examination

## Matter 4 – Housing: Spatial Distribution

Prepared on behalf of Robert  
Hannington, Lowfields, Hartley Wintney

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## 1 INTRODUCTION

- 1.1 On behalf of our client, Robert Hannington, we set out additional representations in response to the Inspector's Matter 4 (Housing, the spatial distribution of new housing). We are only replying to those questions which are of relevance to our client's site, and have, as requested, kept our responses concise and relevant.
- 1.2 Mr Hannington previously represented himself and submitted representations to earlier stages of the Local Plan process. Mr Hannington's interest is in the allocation of his site at Lowfields, Hartley Wintney for residential development. The site was proposed for allocation in an early version of the Neighbourhood Plan, but the Plan now proposes a more restrictive approach to development.
- 1.3 Whilst we recognise that the Inspector cannot consider omission sites directly, we draw attention to various elements of unsoundness in the Council's approach and suggest were the Plan should be modified.
- 1.4 We note that as the Local Plan is being prepared under the transitional arrangements, it has to show conformity with national policy as set out within the National Planning Policy Framework of 2012, rather than the updated NPPF of 2018. We therefore refer to the paragraph numbers of the 2012 NPPF and if appropriate cross reference to the 2018 NPPF.
- 1.5 We confirm that we currently wish to attend the Examination hearing session on Matter 4.



## 2 RESPONSE TO MATTER 4 – HOUSING, THE SPATIAL DISTRIBUTION OF NEW HOUSING

### INSPECTOR'S QUESTIONS

- 2.1 **Question 4.1** Is the settlement hierarchy set out in the Plan justified and based on up-to-date evidence?
- 2.2 **Question 4.3** Is the proposed distribution of housing set out in Policy SS1 supported by the Sustainability Appraisal and will it lead to the most sustainable pattern of housing growth?
- 2.3 **Question 4.4** Does the Plan unreasonably restrict new development in rural areas? How will the housing needs of rural communities be met?
- 2.4 **Question 4.5** Are the identified settlement boundaries in each case justified?
- 2.5 **Question 4.6** Paragraph 103 of the Plan states that settlement boundaries will be reviewed through a future Development Plan Document. Is this justified?

### RESPONSE TO THE INSPECTOR'S QUESTIONS

- 2.6 In response to question 4.1, we are pleased that Hartley Wintney is recognised as forming an important part of the Council's settlement hierarchy. This is based on evidence set out within the settlement hierarchy topic paper which forms part of the evidence for the emerging Plan. The topic paper is rather out of date and could usefully have been updated for the purposes of the Local Plan Review.
- 2.7 However, our view is that the term 'rural service centre' as proposed in the Core Strategy Preferred Options from 2006, would be a more accurate description than 'large village' as proposed in the emerging Local Plan. Rural service centre would better reflect the role and function of Hartley Wintney, including the role that it serves for the surrounding rural area.
- 2.8 In terms of national policy, the NPPF from 2012 promotes sustainable development in rural areas, through locating housing where it will enhance or maintain the vitality of rural communities. This wording is retained in the recent NPPF from 2018 (paragraph 78).
- 2.9 Our main concern is that the spatial strategy is not aligned to the settlement hierarchy, meaning that sustainable locations such as Hartley Wintney, with its range of services and facilities, are



not allocated any housing. This does not appear to be the most sustainable pattern of housing growth. We have looked through the Sustainability Appraisal, but cannot see that it properly appraises reasonable alternatives, and it is not clear how a spatial distribution approach which is focused on existing settlements has been rejected. There is one allocation at Hartland Village and a proposed area of search at Winchfield/Murrell Green; neither of these are particularly sustainable when assessing the three strands of sustainability.

- 2.10 Whilst we understand that the emerging Neighbourhood Plan for Hartley Wintney is tasked with allocating housing for the area, it is a matter of concern that the emerging Neighbourhood Plan is taking a particularly restrictive approach to the appropriate quantum of housing. Despite taking a more positive approach initially, and including Lowfields as an allocation, together with other sites, the Neighbourhood Plan now only proposes to allocate 23 houses to Hartley Wintney. This is a tiny amount given that Hartley Wintney contains 5.5% of Hart District's population, and is a sustainable location, well-served by facilities and services and defined as a local centre by the emerging Local Plan in terms of its range of retail facilities. We have made comments to the Neighbourhood Plan consultation which expresses concerns about this low number in terms of delivering the housing that the area needs. The option is open to the Inspector to propose modifications that allocate different numbers to specific parts of the settlement hierarchy within the District. This happened in neighbouring Waverley Borough, in relation to Farnham Town, which had a newly made Neighbourhood Plan. The Inspector examining the Waverley Local Plan assessed that the overall housing number was too low, increased it and modified the Plan to allocate higher numbers to sustainable locations such as Farnham. The Neighbourhood Plan for Farnham is in the process of being modified in order to accommodate these higher numbers.
- 2.11 Our assessment is that the Local Planning Authority should have worked more proactively with the Neighbourhood Plan Group to agree a more appropriate housing number.
- 2.12 Our assessment is that the Plan unreasonably restricts new development in rural areas due to its spatial strategy. It does not respond effectively to the evidence base in terms of the defined settlement hierarchy and will not provide the quantum of housing to meet the needs of the rural communities. Policy SS1 is therefore not justified as the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence (paragraph 182 of the NPPF, 2012). It is therefore unsound and should be modified.



- 2.13 In terms of question 4.5, we do not agree that the settlement boundaries are justified. One of the sources of housing supply set out within table 1 (d) is sites within settlement boundaries. However, the settlement boundaries are so tightly drawn that the quantum expected to be delivered (184 dwellings) is unrealistic. The Local Plan should have been used as the opportunity to review the settlement boundaries. In terms of the tests of soundness, it is not justified to leave this to a future development plan document – for which there is no timeframe. Not reviewing them at this stage unreasonably restricts new development within the rural areas and will lead to local needs not being met. This conflicts with paragraph 50 of the NPPF 2012, which sets out that local planning authorities should “.....create sustainable, inclusive and mixed communities...” and “identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand” (our emphasis). This leads to the Local Plan being inconsistent with national policy in this regard, introducing a further element of unsoundness in terms of paragraph 182 of the NPPF (2012).
- 2.14 Whilst we understand that the Inspector must examine the Plan in terms of its conformity with the 2012 NPPF, paragraph 68 of the 2018 NPPF is highly relevant to our client’s site. This sets out the importance of small and medium sites in terms of making a contribution to the housing requirement, with local authorities being expected to identify at least 10% of their housing requirement on sites no larger than one hectare. We do feel that this is highly relevant to Hart District, given its largely rural nature. If the Inspector considers that the Plan needs modifying with regard to the spatial strategy or the housing numbers, it would be useful if this important element of Government policy could be addressed, and small and medium sites allocated in accordance with the settlement hierarchy in order to add some flexibility into housing delivery in the District.

#### **MURRELL GREEN/WINCHFIELD**

- 2.15 **Question 4.10** Is there a need for a new settlement Murrell Green/Winchfield within the plan period?
- 2.16 **Question 4.12** Is there sufficient evidence to suggest that a new settlement can be delivered in Murrell Green/Winchfield without causing significant impacts to the surrounding area and infrastructure?
- 2.17 **Question 4.15** Are the criteria set out within Policy SS3 justified?



## RESPONSE TO THE INSPECTOR'S QUESTIONS

- 2.18 In response to the Inspector's question regarding the need for the new settlement, we do not agree that there is a need for a new settlement at Murrell Green/Winchfield and we have not seen evidence which justifies the inclusion of this area of search. The area of search was included at a very advanced stage of the Local Plan, meaning that there has been limited opportunity to comment on this matter.
- 2.19 Whilst planning for higher housing numbers adds in an element of flexibility which we consider will help the Plan to be found sound, these numbers would be better allocated to the key settlements within Hart District, which include Hartley Wintney. This would assist in ensuring a sustainable pattern of development which would better respond to local needs. Earlier consultations including the draft Hartley Wintney Neighbourhood Plan have resulted in the view that small additions to existing villages are far preferable than a large new conurbation.
- 2.20 In response to question 4.12, our assessment is that a new settlement at Murrell Green/Winchfield will have significant negative impacts upon the surrounding area and the infrastructure. As a starting point, the infrastructure requirements are huge, and it is unknown if the delivery of the site is realistic or viable.
- 2.21 A key environmental concern is that a major development in the Winchfield area would effectively close the existing 'gap' between Hartley Wintney, Odiham and Fleet. The Murrell Green proposal would close the gap between Hartley Wintney and Hook. This is rather ironic given that the draft Plan has a specific policy which identifies gaps and a policy approach towards the protection of them.
- 2.22 Policy SS3 sets out a range of requirements for the area of search. This includes new community facilities such as retail. The provision of new retail facilities has the potential to undermine existing retail centres such as Hartley Wintney and Fleet.