

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

## Matter 4 - Housing

### Land East of Bartley Wood

*Prepared For*  
**UKSEI Ltd**

**October 2018**



**bell cornwell**

CHARTERED TOWN PLANNERS

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## 1 INTRODUCTION

- 1.1 On behalf of our client UKSEI Ltd 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 question which are of relevance to our client's site and have, as requested, kept our responses concise and relevant.
- 1.2 UKSEI Ltd were previously represented by WYG, who made comments to the Regulation 19 version of the Local Plan.
- 1.3 Our client is the Freehold owner of 260/270 Bartley Wood Business Park, Hook. They are also the promoter of a site to the east of Bartley Wood, Hook, which would be suitable for a residential-led strategic development, which could come forward either in its own right, as a standalone extension to Hook, or as the first phase of a new settlement based on the Murrell Green/Winchfield area. We note that the new settlement, whilst proposed in the Plan, is in the very early stages, and we address this issue in more detail below. We enclose a map as Appendix 1, showing the extent of our client's land interest and indicating how the site could be masterplanned. This is based on the outcomes of landscape work carried out by landscape consultants Terrafirma, which has responded to the constraints and opportunities of the site.
- 1.4 Whilst we recognise that the Inspector cannot consider omission sites directly in terms of making decisions in regard to whether or not they should be included in the Plan, we draw attention to various elements of unsoundness in the Council's approach and suggest where the Plan should be modified.
- 1.5 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 (NPPF) of 2012, rather than the updated NPPF of 2018. We therefore refer to the paragraph numbers of the 2012 NPPF, and if appropriate, we also cross reference to the 2018 NPPF.
- 1.6 We confirm that we currently wish to attend the Examination hearing session on Matter 4.



## 2 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 4.5** Are the identified settlement boundaries in each case justified?
- 2.4 **Question 4.6** Paragraph 103 of the Plan states that settlement boundaries will be reviewed through a future Development Plan Document. Is this justified?
- 2.5 **Question 4.10** Is there a need for a new settlement at Murrell Green/Winchfield within the plan period?
- 2.6 **Question 4.11** The Housing Topic Paper suggests that houses could be delivered by 2024 (a six-year period from now). Is a long lead in time therefore required to deliver the new settlement, as suggested by the Council?
- 2.7 **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?
- 2.8 **Question 4.14** Is the area of search in terms of its boundary justified?
- 2.9 **Question 4.15** Are the criteria set out within Policy SS3 justified?

### RESPONSE TO THE INSPECTOR'S QUESTIONS

#### QUESTION 4.1

- 2.10 No, we have assessed that the settlement hierarchy set out in the Plan is not justified nor based on up-to-date evidence. A background paper dating back to January 2010 provides the evidence for the settlement hierarchy. This is clearly dated and does not respond to the most up to date information with regard to Hook.



- 2.11 Hook was previously referred to in the Core Strategy preferred options document as one of the four 'main settlements' within the District. The settlement hierarchy sets out the evidence and then concludes that tier one (described as a main urban area) consists of Fleet, and tier two (described as a primary local service centre) consists of Blackwater, Yateley and Hook.
- 2.12 Within the submission version of the Local Plan, however, Hook is described as a 'main village' and is in the second tier of the settlement hierarchy. It is unclear why Hook is described as a village location, this does not respond to either evidence from 2010, or the fact that Hook has experienced considerable growth since 2010.
- 2.13 To analyse this further, the main towns of the District are described in the emerging Local Plan as Fleet, Yateley, Blackwater and Hawley. Hook has been included in a second tier with Hartley Wintney and Odiham/North Warnborough. This is inconsistent. Hook is larger than the Blackwater/Hawley area and has a greater level of facilities and services. Hook is considerably bigger than both Hartley Wintney and Odiham/North Warnborough and should not be included in the same category as them. Hook should not, based on all of the evidence, be described as a large village. It would be more appropriately and accurately be described as a town given the evident range of facilities and services, which include significant retail and employment provision.
- 2.14 We consider, therefore, that the settlement hierarchy with regard to Hook is unsound. It is not justified by the evidence as set out within the Council's Settlement Hierarchy Topic Paper. It appears that the Council is attempting to retrofit a settlement hierarchy in order to defend its spatial strategy.

#### **QUESTION 4.3**

- 2.15 No. We do not agree that the proposed distribution of housing set out in Policy SS1 will lead to the most sustainable pattern of housing growth.
- 2.16 Hook is identified as a 'large village' within the Local Plan. As we have set out above in our response to Question 4.1, this is inaccurate. Hook is, factually, more appropriately described as a town, given its range of facilities and services which include a railway station with direct access to London and Basingstoke. Irrespective of the descriptive term for the settlement, however, it should be included within 'tier one' of the settlement hierarchy for the reasons explained above.



- 2.17 The spatial distribution should reflect the evidence that is available on the settlements within the District. However, instead, the spatial strategy is restrictive and makes only limited allocations.
- 2.18 An alternative strategy to the one selected, would have been to allocate a greater range of sites to the most sustainable settlements in the District. The Council seeks to add flexibility into the numbers via the proposed 'area of search' at Murrell Green/Winchfield. However, an alternative would be to set out additional allocations or additional numbers to be found at the key settlements. This would include plan-led allocations at Hook, to make use of the existing facilities and services which exist in the town.
- 2.19 Our client is promoting land east of Bartley Wood which would form a sustainable extension to Hook. The western and northern edges of the site are adjacent to the current settlement boundary of Hook, the site is therefore very well-related to the existing built up area. Bartley Wood Business Park lies adjacent to the site to the east, there have been a number of prior approvals to convert business uses to residential dwellings. Residential development is also located opposite to the north-west corner of the site. Residential development here would therefore form a logical and sustainable extension to the urban area of Hook.

#### **QUESTION 4.5 AND QUESTION 4.6**

- 2.20 No, the identified settlement boundaries are not justified. The effect of the settlement boundaries, as drawn, is to restrict development in the most sustainable locations of the District. Our interest is in Hook, which is one of the most sustainable locations in the District. The Local Plan does not allocate any development to Hook, nor does it review the settlement boundary. The Local Plan is clearly the opportunity to review the settlement boundaries of the District. 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.

#### **QUESTION 4.10**

- 2.21 With regard to whether there is a need for a new settlement at Murrell Green/Winchfield within the plan period, whilst we are supportive of the Council's efforts to add flexibility into the housing numbers, our assessment is that the proposed 'area of search' is not justified by the evidence.



- 2.22 We agree with the Council's assessment in paragraph 140 of the Plan that the housing numbers for the District are likely to continue to increase, and that it is prudent to seek to respond to this requirement through the current Local Plan.
- 2.23 The Murrell Green/Winchfield 'area of search', however, is not justified by any evidence. We note that the Council sets out, in paragraph 43 of the Plan that the most sustainable option for a new settlement is in the Murrell Green/Winchfield area and that this is supported by the Sustainability Appraisal. In its current form, however, we do not agree that the area of search is justified by the evidence.
- 2.24 We have concerns about both the location, and the new settlement approach, which unnecessarily restricts the focus on alternative, more sustainable approaches. The area of search is an isolated proposal, poorly related to any existing settlement. One solution to this would be to change the boundaries of the area of search, so that the new settlement 'grows' from Hook outwards. Our client's site could form the first phase of a new settlement, building out from the Hook side of the development, therefore having the ability to utilise the local facilities and services which Hook offers in the short to medium term, before the site is delivered comprehensively and provides the full range of infrastructure to serve the site.
- 2.25 If the Inspector is minded to modify the Plan and delete reference to the area of search, alternative sites, potentially in the form of reserve sites, would be sustainable options to deliver housing and meet future, higher needs. Additional sites could be included in the Local Plan now, to add certainty about the future location of development and to add some flexibility into the supply. Our client's site works as a replacement for the Winchfield/Murrell Green area of search and could be included within the Local Plan now, in order to add additional flexibility and certainty into the housing numbers. This could be done through a main modification to the Plan if the Inspector is supportive of this approach.

#### **QUESTION 4.11**

- 2.26 Yes, the proposed new settlement, in its current iteration would require a long lead in time. The boundaries of the site are not in place as yet and there is some way to go before this matter is firmed up. The Council propose (paragraph 105 of the Local Plan) to progress a separate development plan document (DPD) in order to explore key issues such as the "precise location, scale and mix of development....". This will not be a quick process, given the technical work that



needs to be done, as well as the necessary processes of consultation and examination. Assuming that the Local Plan itself is adopted in 2019 (we suggest that there are likely to be main modifications to the Plan, meaning that adoption is likely to be delayed until later in 2019), the new settlement DPD is not likely to be adopted until 2021/22. This will be followed by the planning application process, which is also likely to be lengthy. Additionally, the identified site is subject to multiple ownerships which calls into question the deliverability and certainly extends anticipated timescales. Taking all of this into account, plus the requirements for site assembly, which is likely to be considerable in this case, leads to a conclusion that 2024 is somewhat optimistic.

#### **QUESTION 4.12**

- 2.27 Our assessment is that, in its current form, the proposed new settlement at Murrell Green/Winchfield will have significant negative impacts upon the surrounding area and its infrastructure. The infrastructure requirements are considerable, and the proposal is not well advanced enough for the Council to conclude that it is genuinely deliverable, rather than purely aspirational. Whilst we understand that this work is planned to be carried out following the adoption of the Local Plan, at this stage, the inclusion of the area of search within the plan cannot be justified by the available evidence.
- 2.28 As we have set out above, there are alternative options to ensure the soundness of the Plan, in particular making the best use of deliverable edge of settlement sites within sustainable locations. This provides the necessary level of certainty in the deliverability of sites for housing.

#### **QUESTION 4.14**

- 2.29 We do not agree that the area of search in terms of its boundary is currently justified as we have not seen any evidence that clarifies how and why this particular area has been chosen. If an area of search is to be included within the Plan, it would be a more sustainable option to include a broader area, including our client's site, so that the first phase of the new settlement could be built out from Hook, which is an existing settlement, identified by the Council's own settlement hierarchy as being sustainable.

#### **QUESTION 4.15**

- 2.30 We do not agree that the set of criteria set out within policy SS3 are currently justified. Given that the area of search is a broad one, with no firm boundary as yet, it is too early to set out



policy requirements for the site. In any case, a number of the policy criterion are unnecessary and duplicate other policies of the Local Plan. Only criterion a), b), c), i), j) and l) are justified and effective; however, these could be better phrased to provide additional clarity.

