



Matter 4 – Housing: The spatial distribution of new housing
Claremont Planning for EPV N Hants
Representor No. 164

MATTER 4 EXAMINATION STATEMENT

**EUROPEAN PROPERTY VENTURES
(NORTH HANTS)**

REPRESENTOR 164

**HOUSING: THE SPATIAL DISTRIBUTION OF NEW
HOUSING**



This Statement for Matter 4 will seek to address the Inspector’s Questions identified below:

1. Is the settlement hierarchy set out in the Plan justified and based on up to date evidence?
2. Is Policy SD1 justified and consistent with national policy, namely Paragraph 14 of the NPPF, 2012?
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?
4. Does the Plan unreasonably restrict new development in rural areas? How will the housing needs of rural communities be met?
5. Are the identified settlement boundaries in each case justified?
6. Paragraph 103 of the Plan states that settlement boundaries will be reviewed through a future Development Plan Document. Is this justified?

Hartland Village

7. Are the criteria set out within Policy SS2 justified?
8. Can the site be delivered as proposed, without causing unacceptable
9. impacts on the surrounding area and infrastructure?
10. Does the recent planning permission for the site make provision for accommodation for older persons and self/custom build homes?

Murrell Green/Winchfield

11. Is there a need for a new settlement Murrell Green/Winchfield within the Plan period?
12. 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?
13. 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?
14. The Council suggest that the new settlement is needed to deliver a much needed secondary school. However, given that 90% of the proposed supply has already been granted planning permission, is this the case?
15. Is the area of search in terms of its boundary justified?
16. Are the criteria set out within Policy SS3 justified?



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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 appropriately ensure housing delivery within the district of Hart.
2. On behalf of EPV, Claremont Planning wishes to identify 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 this Statement 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.
3. The most pertinent issue to be raised in relation to the proposed settlement hierarchy is the plan's lack of strategic approach for Yateley, including no new housing allocations or environmental designations. This is despite Yateley being identified as the second largest settlement in the District and is positioned away from SPA Buffer Zones where environmental impacts constrain development potential. The lack of recognition of the potential of Yateley to accommodate further development without impacting upon environmental designations is not clearly explained and the lack of justification represents an unjustified approach to the proposed development distribution strategy.
4. It is also somewhat unreasonable to adopt a plan on the basis that the critical matter of settlement boundary reviews of main settlements is to be further reviewed before the next plan period. Recognising the lack of robust provision for allocations in the current version of the Local Plan and not justifying recent removal of draft allocations, which appear to have been deleted in haste to achieve a plan adoption timescale rather than provide a robust policy. This approach will not provide an effective plan-making process or resulting strategy, given that an opportunity to review settlement boundaries should be prioritised at the time of preparing a new Local Plan, with the ability to provide for further allocations at lower order settlements and through the Neighbourhood Plan process. As the Council has selected an approach that advances an unjustifiably modest level of housing and a distribution strategy that avoids the second largest settlement, the Plan does not include a development strategy that is well founded or is of a sound approach.
5. Whilst it is acknowledged that Hart District is substantially constrained ecologically by the presence of the TBHSPA that influences the possible and acceptable locations of growth, it is not constrained in totality. Areas of the District remain available to accommodate sustainable development beyond the impact contours and could be realised over the new Plan period alongside environmental mitigation through SANG provision. The failure of the Plan to appropriately identify SANG to address the environmental impacts arising from development over the whole period and across the settlement hierarchy demonstrate the inappropriateness of the policy approach. The lack of strategic approach for Yateley is demonstration of this failure, and that despite its position in the settlement hierarchy is not judged to be suitable for growth.



6. The current development distribution strategy of the Local Plan does not demonstrate a plan-led approach given that it is underpinned by the unjustified reliance on the delivery of windfall sites and the construction of allocations made in Neighbourhood Plans. This diversion away from a fundamental aspect of preparation of Local Plans, as required through National Policy, establishes that the Plan has not been positively prepared and has resulted in an inappropriate development strategy that is not plan-led.
7. On behalf EPV, Claremont Planning identifies that the emerging plan and its strategic approach to distributing housing is unsound. 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 given that it is not positively prepared to ensure the delivery of the required infrastructure across the District. Through these representations the failings of the proposed strategic approach it is 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.
8. The Plan's proposed approach to address long term housing needs through a new settlement is qualified by the scale of future housing requirements and the constraints that exist around existing settlements. However, Claremont Planning believes that the identification of the search area for the new settlement has been identified inconsistently with the other strategic considerations proposed by the Plan. An example of this is the references to no further development in the North of the Borough and at Yateley due to the impacts of the TBHSPA, despite areas around Yateley being beyond environmental impacts and related designations. The plan therefore directs environmental constraints as of a level that limits development around Yateley but identifies a new strategic allocation at Hartland Village in an area affected by nearby SSSI's and within 400m of the SPA and SINCC. The previously developed status of the land admittedly warrants its allocation but the proposals of the plan to repeatedly identify housing sites within environmental impact areas; whilst discounting otherwise sustainable sites for environmental impacts when they are beyond environmental influences is ineffective and inconstant.
9. The Plan's proposed approach to address long term housing needs through a new settlement is qualified by the scale of future housing requirements and the constraints that exist around existing settlements. However, Claremont Planning believes that the identification of the search area for the new settlement has been identified inconsistently with the other strategic considerations proposed by the Plan. An example of this is the references to no further development in the North of the Borough and at Yateley due to the impacts of the TBHSPA, despite areas around Yateley being over 6 kilometres from the SPA and beyond the impact catchments. The plan therefore directs environmental constraints as of a level that limits development around Yateley but identifies a new settlement search area that is located within 5 kilometres of the SPA. Although noting the ability of any new settlement to provide SANG, it is apparent that the proposed strategic does not consistently apply the proximity to the SPA and requirement for SANG as a constraint.
10. It is the view of Claremont Planning that the distribution of development inappropriately ignores the potential of accommodating appropriate levels of growth to Yateley and ignoring the capabilities of suitable development sites to accommodate a higher level of housing than is currently set out by the plan and undermines the findings of the collated evidence document.



11. On behalf of European Property Ventures North Hampshire (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.
12. The Council should provide housing land allocations across the borough to meet the required more realistic quantum of housing development. Claremont Planning therefore insist that additional sites are provided for at Yateley, including re-allocation of the EPV owned site at Eversley Road to assist in accommodating future housing needs.
13. The Local Plan proposes a low number of homes to be delivered to 2032 however, it is stated future requirements will be higher and that a new settlement will be necessary to be delivered within the plan period through a separate DPD. The Council are therefore acknowledging that more houses are required than are allocated but there are no definitive plans for this 'New Settlement' or the appropriate growth of high order settlements such as Yateley.

Eversley Road Site, Yateley

14. The EPV owned site at Eversley Road (SHLAA 273-272 and draft allocation SC5) is ideally located for allocation immediately adjacent to the Yateley settlement boundary. A series of Evidence Base reports were prepared supporting development at this location including ecological surveys and landscape assessment by the Council's consultants. The development of the site would result in a logical expansion to the west of Yateley, an area that can logically accommodate growth beyond the restrictions of flooding and Thames Basin Heath SPA elsewhere around Yateley.
15. 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 more houses are required than they suggest but they have no definitive plans for this New Settlement and a highly sustainable draft allocation at Yateley has been deleted.
16. The SC5 site was previously a draft allocation in the regulation 18 consultation draft and was therefore previously considered suitable for development. This allocation was proposed following considerable discussions between Claremont, EPV and East Hants LPA who were the acting Planning Policy Officers for Hart DC at the time. However, it is maintained that the switch back to Policy Officers of Hart DC is the reasoning for its de-allocation and the failure to identify SANG for designation at Yateley; not the unsuitability of the site or inappropriateness of growth at Yateley. This does not advance any measure of the plan policy being positively



prepared and seeking logical resolutions to recognised issues, such as the impact on the SPA and the need for SANG to be provided for the plan period at Yateley. A series of consultant reports were previously prepared by the Council supporting development at this location and recognising that it was more suitable for residential development than SANG or landscape break, a matter that has been overlooked whilst the LPA has pursued the plan forward. In respect to Figure 3 of the plan the extent and purpose of gaps between settlements are unjustified and overly restrictive in respect of the expansion of sustainable settlements.

17. Claremont Planning believe that it was unjustified to remove site SC5 from the draft allocations, particularly as the Local Plan is suggesting a restricted number of new homes across the plan period and will not meet the expectations of a long-term environmental strategy. The Local Plan proposes an inadequate level 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 more houses are required than they suggest, have no definitive proposals for a 'New Settlement' as well as seeking to further review settlement boundaries at some point in the plan period through a site allocation DPD. The deletion of sustainable development allocations at Yateley are therefore unjustified when the settlement has the capacity and hierarchy position to accommodate growth.
18. The fact that the EPV site was previously allocated demonstrates that there was no strategic need to retain a landscape gap beyond the western boundary of Yateley to prevent coalescence with Eversley and that development at this location was acceptable. It is the view of Claremont Planning that the identified settlement boundary for Yateley is therefore not justified and should be expanded to the west to accommodate the Eversley Road site.
17. The site under ownership by European Property Ventures North Hampshire provides an opportunity to secure environmentally sustainable growth which will not cause materially significant harm to the existing SPA. To overcome the biodiversity and ecological concerns the land owner has sought to identify a strategic solution to SANG provision at Yateley, which is set out in detail in the Examination Statement for Matter 12 – Environment. In order to overcome the environmental SANG concerns the land owner has sought to provide a solution to SANG and this is set out in detail in the Examination Statement relating to matter 12 – Environment. This, alongside the other sites being promoted by CEMEX and Gawthorpe Estates include substantial areas of SANG, will be able significantly increase the SANG capacity not of only Eversley and Yateley, but also for the District as a whole.
19. The lack of foresight to provide for SANG and deliver appropriate housing growth at Yateley is demonstration that the existing identified distribution of development in the emerging Local Plan does not go far enough in locating development sites that are acceptable in terms of impacts on the SPA but are also able to effectively provide suitable avenues of growth. The Plan's failure to provide for the accounted local needs of its communities and deliver sustainable development in accordance with the National Planning Policy Framework is demonstration of its failure to plan for evidence housing requirements through a deliverable and justified strategy for dispersing development.
20. In order to resolve these concerns, it is suggested that the site at Eversley Road is reinstated as a housing land allocation for up to 120 dwellings and that further housing growth at Yateley is required. The EPV owned site is immediately available and could come forward for development within the next 5 years, much sooner than a proposed new settlement on land



that is yet to be identified, allocated or acquired and therefore it seems unrealistic to assume that any housing from a new settlement can be delivered in the next 5 years. The Eversley Road site would also contribute toward further housing delivery at Yateley, rightly recognising its position and role in the settlement hierarchy.

21. Claremont planning believes that strategic allocations should be identified at this stage of the Local Plan; but if the Inspector considers that this is not required then the DPD process must entail all sustainable locations and not restrict sites from unfounded local landscape gaps
22. Claremont Planning have demonstrated that the plan cannot be found effective, sound or legally compliant without further modification given the inadequacies surrounding the distribution of development and the lack of appropriate allocations at Yateley. To address housing needs within the Yateley areas further allocations should be provided for around Yateley and Eversley.

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