

LAND SOUTH OF READING ROAD

HART LOCAL PLAN EXAMINATION – FURTHER HEARING STATEMENT

MATTER 4 – HOUSING: SPATIAL DISTRIBUTION OF NEW HOUSING

CEMEX

25 OCTOBER 2018



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4.0 Matter 4 – Housing: The spatial distribution of new housing

- 1.1 On behalf of CEMEX Properties (CEMEX) and its interest in ‘Land south of Reading Road, Eversley’, the following information is provided in regard to Matter 4 – Housing: The Spatial Distribution of New Housing.
- 1.2 CEMEX has fully engaged with the Local Plan process and submitted representations to previous consultations. The site is referenced SHL112 in the SHLAA (2018). It is located on the edge of Eversley village, extending to approximately 48 ha, although much of this area is promoted for SANG provision alongside housing.
- 1.3 The site has the potential to deliver up to 150 new homes, a 60-bed care home with access off Reading Road and Hollybush Lane, and an over-provision of SANG land, within the early part of the plan period. The focus is for residential development to the north of the site, off Reading Road, with public open space and significant SANG provision located on the remaining area, securing the long-term positive management of open space and woodland.

Is the settlement hierarchy set out in the Plan justified and based on up-to-date evidence?

- 1.4 The settlement hierarchy is based on the ‘Settlement Hierarchy of Hart District’ published in 2010. In the context of informing the emerging Local Plan, this is out of date. Reliance on outdated evidence, which provides no addendum noting recent developments at the main villages, is inappropriate and inconsistent with the NPPF.
- 1.5 Notwithstanding the age of the evidence, neither the settlement hierarchy nor proposed spatial strategy take account of the important role of the smaller settlements, known as main villages within Figure 2 of the draft Local Plan. Paragraph 43 provides relevant information about the settlements and focuses purely on the main urban areas and primary and secondary local services centres (including; Fleet, Yateley, Blackwater and Hawley, Hook, Hartley Witney and Odiham and North Warnborough) and ignoring the presence of the larger villages and their role.
- 1.6 In the context of Eversley, the lack of recognition in the plan of the role of smaller settlements in accommodating some growth fails to promote support for those settlements and economic development within rural communities. The allocation of small to medium-sized sites within main villages, such as Eversley, would help support local, existing, services as well as ensuring their continued vitality, in line with paragraph 55 of the NPPF (2012) and paragraph 78 of the NPPF (2018). It would also deliver housing for those in need of affordable housing and for the elderly in a distributed way across the district, facilitating greater choice of where people wish to live, in the communities that they feel close to.

Is Policy SD1 justified and consistent with national policy, namely Paragraph 14 of the NPPF, 2012?

- 1.7 No additional comments.

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?

- 1.8 The Sustainability Appraisal (SA) considered Option 1 (the allocation of Hartland Village only) to be the most sustainable option and acknowledges that this assumes a target supply of 388 new homes per annum from Hartland Park. It is stated that the overall land supply is sufficient to provide 397 new homes per annum, when including sites with planning permission. Notwithstanding the Council's overoptimistic delivery trajectory for Hartland Village with one housebuilder on-site, this preferred approach fails to provide flexibility in the plan to react to rapid change, as required in paragraph 14 of the NPPF (2012). It also fails to provide a framework to maintain or enhance the vitality of the main villages located throughout the district, such as Eversley, and could adversely affect the prosperity of these smaller settlement communities. This is not acknowledged or assessed in the SA.
- 1.9 The Council's approach, along with the new settlement (to be delivered towards the end of the plan period), focuses development within the centre of Hart District. While this is located near to the main transport routes and hubs, it fails to create a choice of high-quality homes across the district, as required by paragraph 9 of the NPPF (2012).
- 1.10 The allocation of small and medium-sized sites (50 – 200 new units) in a distributed way across the district would help support local services as well as ensuring continued vitality and growth in rural locations, in line with paragraph 55 of the NPPF (2012) and paragraph 78 of the NPPF (2018).

Does the Plan unreasonably restrict new development in rural areas? How will the housing needs of rural communities be met?

- 1.11 It is considered that the Local Plan unreasonably restricts development. As highlighted above the preferred approach to development fails to support the main villages located throughout the district.
- 1.12 Supporting rural communities is one of the core planning principles set out in paragraph 17 of the NPPF (2012). In addition, paragraphs 55 (NPPF, 2012) and 77 (NPPF, 2018) detail the continued support for rural communities and require planning policy to be responsive to local circumstances and support housing development that reflects local needs. Further, paragraph 78 (NPPF, 2018) requires plans to identify opportunities for villages to grow and thrive. It states:
- “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”*
- 1.13 The plan should include available and developable sites such as 'Land south of Reading Road' in Eversley, that offer opportunities to support and sustain villages and rural communities. Without this provision the plan is inconsistent with the NPPF and unsound. It is also ineffective in delivering housing where it is needed.

- 1.14 Restricting development to within tight settlement boundaries at the larger villages, as set out in draft policy NBE1, does not comply with the approach set out by National Policy. Sustainable, well-planned development that does not adversely affect the local landscape and can provide additional services and amenities for local residents, should be supported.
- 1.15 The CEMEX site at Eversley represents a positive opportunity to secure the early delivery of a range of housing to meet local needs, supporting the rural community and delivering a significant amount of SANG. This, and other sites located in main villages, have been discounted in favour of a flawed approach, which is inconsistent with National Policy Guidance.

Are the identified settlement boundaries in each case justified?

- 1.16 It is considered that the settlements boundaries are not justified, given their intended role to restrict any new development outside those boundaries, including in sustainable locations adjacent to the boundaries. Little consideration has been given to the future of the main villages and smaller settlements throughout the district. Eversley's settlement boundary remains unchanged for this new plan period, which unnecessarily restricts any future sustainable development. As outlined within the responses above, the emerging Plan fails to plan for rural communities in a sustainable manner and prohibits growth in these areas. The boundaries/policy ought to be able to respond to opportunities for growth, facilitating sustainable development adjacent to them.
- 1.17 The revision to the settlement boundary, or a more permissive policy, would allow development to come forward to support the local rural community and provide a choice of housing, in a sustainable location. The revision would allow greater flexibility in the Council's ability to meet its housing supply, should the large-scale strategic proposed growth be delayed.

Paragraph 103 of the Plan states that settlement boundaries will be reviewed through a future Development Plan Document. Is this justified?

- 1.18 Paragraph 103 of the Plan commits to a review of the settlement boundaries but the plan is ineffective in this respect as there is no justification for postponing the review.
- 1.19 The review of the settlement boundary for Eversley would ensure that the growth of the main village is planned and limited to the most sustainable site (CEMEX land), ensuring that the settlement is able to grow in a contained and sustainable manner with the delivery of SANG.
- 1.20 Small and medium scale sites have been considered by the Council's SHLAA and the allocation of such sites were included within the first iteration of the spatial strategy. This demonstrates that there are sustainable sites available in the large villages. The Council should complete a thorough up-to-date review of the boundaries which should be added to the evidence base and published for the consideration of the Local Plan Inspector.

Hartland Village

Are the criteria set out within Policy SS2 justified?

- 1.21 The criteria for policy SS2 are numerous, but do not contain any specific detail. Given that the site is to be heavily relied on to meet housing requirements, it would be appropriate for the policy to include more detail, including compliant housing mix, types of accommodation and details of the SANG provision.

Can the site be delivered as proposed, without causing unacceptable impacts on the surrounding area and infrastructure?

- 1.22 At such an early stage of the site's delivery, it is difficult to assess whether the site can be delivered as proposed. The presentation made by the land promoters to Hart District Council in September 2018, suggests that the first phase of the off-site SANG provision and 181 new homes are to be built before the key community infrastructure is delivered, including the primary school, which will come forward in phase 2.
- 1.23 However, the delivery of the community facilities, the primary school and other infrastructure provisions within phase 2 relies upon successful Reserved Matters application(s) and the approval of relevant discharge of condition applications, which have yet to be submitted. There will therefore be a lag between new homes and key infrastructure coming forward, which may be an issue.

Does the recent planning permission for the site make provision for accommodation for older persons and self/custom build homes?

- 1.24 The recent permission (ref: 17/00471/OUT) does not make provision for accommodation for older persons and self/custom build homes. The description for development clearly states:

"Hybrid Planning Application (part full, part outline) for a residential-led mixed use redevelopment comprising: 1. Outline Planning Application with means of access (in part) to be determined (all other matters reserved for subsequent approval), for the erection of up to 1,500 dwellings (Use Class C3); a local centre including residential (Use Class C3 within the up to 1,500 dwellings) and up to 2,655m² (GEA) of retail, commercial and/or community floorspace (Use Classes A1 to A5, B1, D1 and D2); a primary school (Use Class D1); drainage works including balancing ponds; on and off-site SANG mitigation; creation of landscaping, open space and ecological habitats; car and cycle parking; demolition of existing buildings; site clearance; earthworks; site remediation; provision of utilities infrastructure; off-site highway works; and all other ancillary and enabling works. 2. Full Planning Application for the erection of 181 dwellings (Use Class C3); access; drainage works including balancing ponds; creation of landscaping, open space and ecological habitats; car and cycle parking; earthworks; demolition of existing buildings; site remediation; provision of utilities infrastructure; off-site highway works; and all other ancillary and enabling works".

- 1.25 On review, the application documentation does not include reference any proposed accommodation for older persons. Condition 6 of the permission,

however, requires the broad location of adaptable new homes and self-build or custom-build homes to be considered within the principles of the Design Code.

Murrell Green/Winchfield

Is there a need for a new settlement Murrell Green/Winchfield within the Plan period?

- 1.26 An area for a new settlement has been identified at Murrell Green/ Winchfield, to meet the district's longer term development needs. The Plan does not explicitly justify this need, and it is unclear why this approach is preferred over alternatives, given the significant up-front works required.
- 1.27 The allocation of small and medium-sized sites (50 – 200 units) and other strategic sites will help to provide new homes throughout the district, throughout each part of the plan period to promote sustainable development within all types of communities and settlements. The SA details a number of options that could be utilised to meet the housing need figures without the use of a new settlement.
- 1.28 The use of other allocations throughout the district will help support rural communities, in line with one of the core planning principles set out in paragraph 17 of the NPPF (2012). In addition, paragraph 55 (NPPF, 2018) allows housing where it will support rural communities. Further, the Council should plan for a variety of locations and types of housing to create a real choice in high quality homes in a range of locations.

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?

- 1.29 The Topic Paper Housing Number and Spatial Strategy confirm that the proposal for a new settlement is not relied upon to meet the housing target identified in this Plan. It allows for an 'area of search', rather than a site allocation, to be identified. A separate DPD will need to pass the 'effective' test, which requires the adoption of a separate DPD for the new settlement, which must complete a number of rounds of consultation. The Topic Paper outlines adoption of the DPD by Autumn 2021, with the delivery of houses by 2024. This is considered far too optimistic and does not take account of any potential delays or change in national policy.
- 1.30 Further, while the Topic Paper acknowledges that a number of technical studies have been completed and land assembly has taken place, the size of the new settlement under policy SS3 has yet to be agreed and significant amounts of further infrastructure planning and viability work will need to be undertaken as part of the DPD.
- 1.31 Terence O'Rourke has reviewed a series of available studies that consider delivery rates on large sites, including reports by Gladman¹, GVA Grimley², Litchfields³ and

1 Hourigan Connolly (February 2014) A Report into the delivery of urban extensions, on behalf of Gladman Developments Ltd

2 GVA (November 2013) Welborne build out rates study, on behalf of Fareham Borough Council

3 Litchfields (October 2017) Interim evidence for the Draft Fareham Borough Local Plan 2036, on behalf of Fareham Borough Council

Troy Planning⁴. There is clear evidence that the lead in time from planning permission to first completion is likely to be between 3 and 8 years depending upon the site. In this instance, a planning permission is some years off and assuming housing will be delivered by 2024 is thought to be extremely optimistic. Pressure should not be placed on such a sensitive large strategic development with so many unknowns, to deliver housing by 2024. Instead, more reliable and deliverable small and medium scale allocations, which will be subject to fewer risks and delay, should be relied upon to deliver housing for this part of the plan period.

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?

- 1.32 As part of the evidence base documents relating to Murrell Green/ Winchfield, the questions and answers document (NSP7) provides background information regarding the proposed phasing and principle behind the new settlement. This states that infrastructure, including transport, the secondary school and SANG, will be provided prior to the delivery of an extensive proportion of the residential development.
- 1.33 However, the details of infrastructure delivery are yet to be agreed. More detailed analysis regarding the appropriateness of the proposals and feasibility of the development impacts, can be interrogated during the Local Plan review, which will take place within 5 years of the adoption of this Local Plan.
- 1.34 These uncertainties, therefore, emphasise the need to consider alternative sustainable housing sites elsewhere in the district, that can deliver homes and open space without such infrastructure requirements.

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?

- 1.35 No additional comments.

Is the area of search in terms of its boundary justified?

- 1.36 The promotional documentation, identifying the Vision and Framework for the new settlement, highlights that comprehensive landscape and visual assessments have been carried out by the Council. This concluded that Murrell Green was the correct location for a new settlement. Further, additional parcels of land in this area have been assessed as part of the SHLAA, which the Council states can contribute to the wider Masterplanning and land assembly for the new settlement.
- 1.37 Notwithstanding this justification of the boundary, the Council provides little justification for the need for this new settlement. The contribution of small and medium scale sites around the district would have less risk and could contribute

⁴ Troy Planning and Design (November 2016) Dunsfold Aerodrome: Delivery Rates Assessments, prepared for Waverley Borough Council

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towards infrastructure delivery throughout the Plan period, rather than the latter part or indeed beyond this plan period.

Are the criteria set out within Policy SS3 justified?

- 1.38 It is not thought that Policy SS3 is required, the principle of the new settlement has not been adequately justified.