



MATTER 8 EXAMINATION STATEMENT

**EUROPEAN PROPERTY VENTURES
(NORTH HANTS)**

REPRESENTOR 164

OTHER HOUSING TYPES AND RELATED POLICIES



This Statement for Matter 8 will seek to address the Inspector's Questions identified below:

Housing Mix – Policy H1

Is criterion b) based on a robust assessment of viability? Has the viability assessment underestimated the cost?

Is criterion c) effective and who will consider if it is appropriate to include specialist/supported accommodation?

Is criterion d) consistent with national policy?

What is meant by 'suitable site' in criterion d)?

Are the thresholds set out in criterion d) justified? What evidence is there to suggest they are appropriate?

The supporting text at Paragraph 176 sets out that if self/custom build plots are not taken up after two years, the Council will allow them to revert back to conventional building plots. The Council has proposed a modification to one year. Is that an appropriate time period?

Is the supporting text at Paragraph 178 setting out policy?

Provisions set out in the Housing and Planning Act 2016 now include a duty (under Section 8 of the 1985 Housing Act) for local authorities to consider the need for moorings for houseboats. Has the Council considered such matters within its consideration of housing need?

Specialist Housing – Policy H4

What are the identified needs for housing for older people, particularly residential institutions (Use Class C2)?

Does the Plan do enough to ensure that the needs of older people are met?

Is criterion b) i) overly onerous?

Is criterion b) ii) justified and is it of relevance to all types of specialist and supported accommodation?

Internal Space Standards – Policy H6

Is the requirement for all developments (needing planning permission) to meet or exceed the nationally described space standards justified?

Does the Council's topic paper on the matter provide clear local evidence in terms of need?

Is Policy H6 based on a robust assessment of viability?

Is the Council's approach to not including a transitional time period justified?

To be effective, should Policy H6 include some flexibility?



Matter 8 – Other Housing Types and Related Policies

Introduction

1. Claremont Planning Consultancy Ltd previously provided responses to the Council's emerging Local Plan on behalf of European Property North Hampshire (EPV) to seek to boost housing requirements and recognise the need to ensure housing delivery within the district of Hart.
2. As it stands, the strategy of the Local Plan inappropriately relies upon sites that will not be able to meet the requirements of the policies of the Plan, which look to deliver a wide range of specialist housing types to meet the needs of communities and certain groups in society. Without an effective strategy that ensures the delivery of a range of sites that can meet these identified needs, the Plan fails to meet the requirements of all sections of society or provide an appropriate mix of housing to meet the demands of growth of the District. The provision of housing where it is needed, not just where it can be provided, is a requisite that has been wilfully ignored through the amount and locational strategy proposed. Resulting in the plan being ineffective, unjustified and contrary to the principles of the NPPF.

Dwelling Type and The Provision of Windfall and Neighbourhood Plan Allocations

3. Forming part of the development strategy of the emerging Plan is the unjustified reliance on the delivery of windfall development in the District as well as the realisation of allocations made through Neighbourhood Plans. Whilst this should always form part of a robust strategy to ensure that numbers are delivered to meet the identified need within a Local Plan, the emerging Plan of Hart District Council inappropriately attributes weight to the delivery of these sites. Firstly, the requirements of the Plan to deliver specialist housing, such as extra care accommodation and custom homes will either constraint the delivery of windfall sites or may not be viable to deliver these sites given that they are of a small scale and forms of care accommodation typically require a threshold of 65 bedroom units to be viable. Windfall sites will not be fully deliverable if the requirement of these policies is realised, jeopardising their delivery to the extent that the strategy requires.
4. Furthermore, given that Neighbourhood Plan allocations are designed to provide development to meet the local need of the Parish, the policy of the Local Plan to ensure delivery of alternative and specialist housing would be inappropriate to apply to such allocation and subsequent development proposals. If the Local Plan requires to deliver the identified need of alternative housing types and mix, the Plan needs to locate sites that are deliverable across all spatial scales so that a robust combination of dwelling forms can be realised. Whilst the Plan identifies two strategic sites, which will most likely be able to deliver a satisfactory mix of dwelling types, given that the Plan over relies on the delivery of these sites this will result in an over concentration of specialist accommodation in one certain spatial point of the District. Rather, if the spatial strategy distributed development more evenly across the Council area, this would result in the provision of a more adequate mix of dwellings throughout the District rather than concentrated at certain locations.
5. The delivery of an adequate residential mix and type is inextricably tied with the viability of a site's development. As the Plan is overly reliant on windfalls and Neighbourhood Plan allocations coming forward, the stipulation of policies regarding housing mix and provision of specialist accommodating will detrimentally impact on the viability of these sites in being delivered. This is especially pertinent to windfall sites which are by nature smaller and non-strategic in size. With Neighbourhood Plan sites, given that they are of a local nature and



designed to meet the need of the Parish, the stipulation of the Local Plan policy is limited, given that the local sites identified will be to cater for any specialist local need rather than that of the District. This undermines the ability of the Local Plan to effectively seek development to meet the specialist need of the District as well as a wider range of dwelling size and type for the growing population.

Site at Eversley Road, Yateley

6. On behalf of European Property Ventures (North Hampshire) Ltd (EPV), Claremont Planning identifies that the emerging plan and its strategic approach to delivering development is unsound and fails to facilitate a comprehensive development strategy with the ability to enable the Local Plan to provide an adequate range of housing types and specialist accommodation for the changing needs of the District. 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.
7. Demonstration of this is the plan's failure to identify any further residential allocations at Yateley despite its demonstrated suitability and sustainability for growth. The site at Eversley Road (SHLAA 273-272 and previous draft allocation SC5) as owned by EPV is ideally located immediately adjacent to the settlement boundary. A series of technical reports were prepared supporting development at this location including ecological and landscape surveys by the Council's consultants. Development of the identified site 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 Thames Basin Heath SPA at all other directions. Technical assessments of this site demonstrate that development at this location can meet the requirements of sustainable development, furthermore this site represents a more appropriate approach in achieving a more robust strategy in achieving the policy requirements of an adequate mix and provision of housing.
8. It is of the view of Claremont Planning that the site under control of EPV is able to contribute towards the accommodation of the housing requirements of the District in terms of Local Plan objectives to accommodate a justified mix of housing types, styles and sizes. Without an appropriate development strategy underpinning the emerging Local Plan, which recognises suitable settlements such as Yateley to accommodate growth, the proposed policies will be ineffective in terms of achieving development that can meet the identified need of the District. In turn, the proposed policies requiring the provision of specialist accommodation will be unable to meet the needs of the District and ultimately lead to the overall failure of the Plan to enable, manage and foster sustainable development.
9. The Council need to identify housing land allocations across the District to meet the required needs of its population and present a more realistic quantum of housing development that is of an appropriate mix and style to meet identified needs. Claremont Planning therefore suggest that the previously proposed SC5 site at Eversley Road is reinstated to assist in accommodating future housing needs and to address the future housing requirements of Yateley.
10. 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. This will impact on the Plan's ability in ensuring that a satisfactory mix of housing, along with the provision of specialist accommodation can be realised through the Plan in the District. Any suggestion that further housing growth at Yateley is inappropriate based upon environmental constraints of the SPA are unfounded and wholly inaccurate with EPV identifying two areas of private SANG that are being promoted for delivery to the west of Yateley that could contribute toward mitigating impacts on protected environments of the SPA. The failure of the Council to recognise these potential areas of mitigation and designate further SANG at Yateley means that the proposed plan completely fails to address the town's housing needs over the lifetime of the plan, meaning that the provision of appropriate housing will be hugely restricted.

11. 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 which in turn impacts on the ability of limits the ability of the Plan to effectively achieve the recognised objectives as well as meet the arising needs as identified in the Plan. To that end, the Plan cannot be found sound on this basis.

Word Count: 1,420 words