

**Hart Local Plan – Housing Options
Consultation
Response by CPRE North East Hampshire
March 2016**



1. *Comments on how to meet needs of specialist groups such as affordable and Starter Homes, Custom or self-build homes, older people, and sites for Travelling Community?*

The needs of such specialist groups as travellers are important individually, but are not central to the Local Plan. The difference between 'needs' and 'demands' for housing has been lost in official policy nationally. The needs of these groups may be met by various means, and not directly via the planning system, which is mainly about land use and not social changes. The Local Plan is concerned principally with spatial planning and should have housing policies and allocations that promote the best or optimum sites or locations for housing overall, i.e. those that best balance the economic, social and environmental considerations, which contribute to sustainability.

2. *Where are the sites within Hart District that you think may be appropriate for:*

a) *Affordable and Starter Homes?*

Affordable and Starter Homes can be secured within larger scale developments, and probably in the main towns. There is also a clear need for such housing in rural areas and villages. The role of the housing associations is important in ensuring widespread provision. Sentinel Housing, for example, has tended to concentrate on towns rather than rural areas. The associations need to act as agents of the council rather than as free agents, and frequently acting in sole pursuit of funding availability. Urban centres are likely to remain important locations. However, in rural areas where rural wages are comparatively low and rural house prices comparatively high, there is a specific need for affordable housing that is currently being met by the 'exception sites policy'. It is important to retain this or a similar mechanism to maintain rural affordable housing in perpetuity.

b) *Custom and Self Build?*

Self-build should be better recognised and encouraged in planning policy. Suitable guidance is needed on the most appropriate locations, and the council should seek guidance on the issues and opportunities for self-build. Numerous sites may present themselves which, at first sight, may seem unsuitable, but which may inspire individuals to pursue their dream. Whilst it may be wrong to stipulate that a percentage of plots on any development should be allocated for self-build, the council should try to promote the concept and be open minded rather than constraining.

c) *Homes for older people?*

We have a population of increasing average age, rather than an ageing society. However, older people are not generally unwell and putting a greater strain on health services. These are myths that are repeated too frequently in the media. An Oxford University study in 2015 showed that older people are generally healthier (which is why they have lived long) and look after themselves better than young people. The elderly do not expect to be looked after, but wish for an independent life. Sheltered accommodation and the like should be located within or near existing built locations. They should not be isolated in 'closed communities', but stay within the wider community wherever possible.

A strategic approach to homecare will also help older people to live well at home for longer, providing many with a home for life. That is good for older people, but there are risks for those with limited means. The council should be mindful of this aspect.

d) *Travelling communities?*

Travellers move across a wide area. This is their nature, and it is also seasonal and changing. In this context, the council needs to think more broadly about the availability of transit pitches. Beyond Hart District, the Peak Copse site near M3 J7 should be re-opened for use by travellers. It has an unfortunate history which is well documented, but that should not blight the opportunities it may present. Hampshire County Council should be requested to reconsider its stance on the site. There may also be a debate about whether traveller facilities should be remote of settled communities, or near to schools and other services. Many resettled gypsies also yearn to travel again, having spent years stuck in one location.

3. *Do you agree with the current Settlement Hierarchy?* No

There appears to be no basis for creating a distinction between villages, by splitting them between Tiers 4 and 5. There is nowhere within Hart that is so remote that it has a truly rural character. To a greater or lesser extent all of Hart's villages have similar characteristics and car-based commuter populations. They are all, intrinsically, less sustainable than urban areas. One criterion referred to in 'A Settlement Hierarchy for Hart District, January 2010' is the existence or otherwise of a 'comparison store'. It is difficult to understand how a village with, perhaps, a car showroom can be described as a more sustainable location for housing than one without.

A settlement hierarchy is a tool, but no more than that. It should not be followed assiduously or slavishly. It works well in some districts, but less so in Hart. This is because Hart combines a small number of larger towns and very many smaller villages. The towns act as quasi-regional centres and a magnet for employment and leisure, but they cannot satisfy all the requirements. Therefore, urban centres outside the District and the highway connections to and from them, also, play a major role in defining the settlement hierarchy.

4. *Of the three possible approaches that could deliver new homes in Hart, which one should we prioritise to deliver the majority of our housing needs?*

Approach 1 - Disperse development throughout the towns and villages in the following parishes: Blackwater & Hawley, Crondall, Church Crookham, Crookham Village, Dogmersfield, Elvetham Heath, Eversley, Ewshot, Fleet, Hartley Wintney, Heckfield, Hook, Rotherwick and Yateley.

Approach 2 - Strategic Urban Extensions at main settlements (West of Hook, Pale Lane Farm adjacent to Elvetham Heath and land west of Fleet)

Approach 3 - A new settlement at Winchfield

CPRE cannot accept that, in the context of this question, Approach 3 is a valid option. The maximum number of homes that any proposed new settlement could deliver within the Plan period would be in the low to mid hundreds. The suggestion that residents can prevent the development of sites in their communities, by opting for a new settlement instead, completely misrepresents the stark choices that are really available to the District.

A new settlement option should be considered for its viability, but probably not within the current consultation. Concentrating development in a single location may appeal to many people, and may lead to greater sustainability. However, it would need to be supported widely by the public after an informed debate. It needs to be considered in a longer timeframe and should only be supported if it has proven benefits for the whole District and wider area. The fact is that the debate, at present, is not informed, and based on considering a 'least worst' option.

There may indeed be benefits from concentration rather than dispersal, but there may be hidden risks and implications, so far not understood. Winchfield is a poor option for development, and the industry would struggle to make this work. In the longer run, a new town may be feasible but it requires close examination and possibly government support. It is unlikely to be secured during the tight timetable for the preparation of a local plan. Beyond that, the existing settlements appear the most obvious locations for additional housing growth. However, this should only occur if comprehensive development is possible, that redresses the failures of the past, and creates a new positive focus.

5. *If we need to combine approaches, which combinations do you prefer?*

Approach 4 - Combine approaches 1 and 2: Disperse development throughout towns and villages and Strategic urban extensions at main settlements

Approach 5 - Combine approaches 2 and 3: Strategic urban extensions at main settlements and A new settlement at Winchfield

Approach 6 - Combine approaches 3 and 1: A new settlement at Winchfield and Disperse development throughout the towns and villages

Approach 7 - Combine all 3 approaches: Disperse development throughout towns and villages, and Strategic urban extensions at main settlements and A new settlement at Winchfield

CPRE starts from a position of considerable doubt in the current 'Objectively Assessed Housing Need' (OAHN) figures and in the methodology of their calculation. CPRE, at national level, has produced a Report entitled 'Set up to fail: why housing targets based on flawed numbers threaten our countryside'. This was based on an independent review commissioned by CPRE. At a Hampshire level, a review of the figures has shown that

Hart's current housing figure is 58.6% higher than the ONS February 2015 household projections and Rushmoor's is 29.2% higher. Using more accurate assessments would radically alter people's viewpoints on the approaches that HDC might take.

CPRE also starts from a position in which it cannot accept that there need be any 'overflow' of housing need from either Surrey Heath or Rushmoor. Both because the OAHN figure is poorly founded and over-large and because to accept that Surrey Heath and Rushmoor might cease to have any greenfield sites is to accept that in future Plan periods, Hart District will need to accommodate the whole of its OAHN, together with about half of Surrey Heath's and about half of Rushmoor's. A potential doubling of the current housing target for Hart would leave Hart District looking for up to four new settlements of 5,000 houses or a new settlement of 20,000 in the next Plan period. In this context the concentration on one 'garden community' of 5,000 homes is short-sighted.

CPRE also starts from a position of fully supporting HDC's priority to deliver new houses on brownfield sites. Unfortunately, few brownfield sites have yet been identified. CPRE therefore, recognises that the number of housing sites allocated at this stage to meet 'needs' will be considerably greater than the actual number of sites that will have to be built within the Plan period. As each new brownfield site is identified; granted permission; and developed, so allocated greenfield sites of equivalent capacity will need to be postponed beyond the end of the Plan period. Without this essential link between site completions and site phasing, Hart faces constructing homes well in excess of its needs.

On these bases alone, the need to commit to a 'new settlement' at this stage is premature. Whilst it is valid to consider the concept, the actual number of homes that any new settlement could deliver within the Plan period would be in the low to mid hundreds. It should, therefore, never have been offered as an Option, in the true sense of the word. The suggestion that residents can prevent the development of sites in their communities, by opting for a new settlement instead, completely misrepresents the stark choices that are in fact available to the District.

CPRE's preferred option is, therefore, Approach 4, but that is not to say that the current allocations, based on incorrect figures, are desirable in themselves. Approach 4 reflects the form of development over the years. Some development will be needed in most towns and villages. Indeed, this is likely to occur as a natural process anyway. These developments need to be better designed and planned than in the past. Volume house building, as occurred in the 1970s and 1980s is no longer appropriate. We should not be building houses, but communities. Sustainable urban extensions are likely to be the only viable option, given the constraints of time, resources and vision.

6. *The New Homes Sites Booklet shows, by Parish, sites that are available for the development of new homes. Winchfield*

It is noted that there has been no selection process to identify which, if any, sites in Winchfield might be shortlisted in the case of a 'no new settlement' option being adopted. This may be prudent, because, until the decision is made that there will be no new settlement in Winchfield, the development of individual sites, ad lib, might adversely impact on the ability to layout and design future developments to achieve their optimal benefits.

7. *Do you have any other comments on the refined housing options paper?*

CPRE does not consider it appropriate to rank the listed sites. It is noted that comments are also invited on the 'rejected sites', but their details have been excluded from this questionnaire, which will automatically reduce feedback. There is a concern that this will result in responses which are, naturally, biased towards the Council's preconceptions.

It is also noted that the capacity figures given for each site are not necessarily those advocated by their proposers. The consultation fails to assess the types of development that the sites' owners think might be most appropriate, so is assessing outcomes that are unlikely to be achieved except through compulsory purchase of sites.

Furthermore, the reason for the arbitrary combining of sites in separate ownership is unclear. If the suggestion is that the 'combined' or COM sites would only be considered in their entirety, rather than in their component parts, then this has serious implications for the deliverability of the sites. The impact would be that the owners of the smaller components would automatically have a far greater 'ransom value' placed on their sites, reducing the potential gains for the owners of larger components. It is not obvious why the Council has chosen an approach that is likely to have an adverse impact on the deliverability of sites. (This

comment applies to Dogmersfield, Ewshot, Hartley Wintney and Hook, but template does not allow references under each of the parishes.)

Seeking further comments on the detail of sites may not be entirely helpful or appropriate at this stage. Sites need to be assessed and judged on their merits, but the relative merits may provide limited guidance for deciding on a site's inclusion in a local plan. Difficulties of delivery may be highlighted, but the comparative support for any site may also be ephemeral. Any ranking of sites may change completely in the light of new information; new sites; new housing numbers; or on the actual choice of strategy that is to be made.

We have identified a set of key issues for Local Plan in table 1. Do you agree with them? No

The 'Local Plan Key Issues' identified in Table 1 are very broad-brush and lack, for the most part, Hart specific detail. It is a list of 'needs' that might apply to any district. Many of the identified needs are key issues, but they are also 'static'. They lack an impetus to achieve desired outcomes, but this could be a reflection of the failure of the Draft Hart Vision 2032.

We have drafted a vision setting out how the district might look by 2032 on page 6. To what extent do you agree with it? Disagree

The Draft Hart Vision 2032 appears to be simply a function of the end date of the Local Plan. It is a statement of outcomes rather than a vision to aim for. It is over long and too dependent on outside factors. It is not clear if success should be judged on whether all or some of the vision has been realised. A vision should be enduring and based on principles, rather than on the results of policy. It should be something to aspire to, rather than merely a set of planned outcomes.

The vision needs to encapsulate both the challenges and the dilemmas for the district. On the one hand, there is growth and social advancement, on the other, resource consumption and environmental impacts. The latter may be judged too high and unsustainable in the longer term. The overall challenge is to try to strike the right balance between such elements.

Just twenty years ago there was a vision, at County level, that saw Hart District becoming a major recreational resource as part of a Forest of Eversley millennium proposal. This would have seen the heathlands and rural areas of Hart providing a counterpoint to the New Forest, to help relieve the pressures on that national resource. It would have given Hart a role in support of the ring of predominately urban boroughs around it that would ensure that they had access to greenspace and countryside. It was a Vision that, in the failure to secure national funding, has faltered. However, it would be a far more powerful vision for Hart, than the draft, which merely seems to postulate that, by 2032, Hart will have accommodated whatever growth is asked of it and people won't have noticed any change.

A parallel vision might be to establish dynamic urban areas that positively encourage lifestyle changes resulting in a lower car-dependence and smaller carbon-footprints. The trend towards dying town centres needs to be reversed for social and economic reasons. The regeneration of existing centres also ensures environmental benefits, both in minimising the use of resources, energy and in the protection of agriculture, biodiversity and recreational resources elsewhere.

The Planning Authority has a unique role in 'place making' to ensure that the distinct characters of its various settlements are maintained and improved. The Vision needs to articulate clearly that the Council recognises the strengths that make Hart the *Best place to live in the UK* (Halifax Quality of Life Surveys 2015), whilst acknowledging that weaknesses, such as shortcomings in infrastructure, will be addressed through the optimal siting of planned growth.

We have identified some draft strategic priorities for the Local Plan in table 2.

The Draft Strategic Priorities given in Table 2 have a limited context and value. For example, the Housing Market Area is not necessarily well-founded now, and could be abandoned. Markets are governed by many widespread and lesser known factors. It is not proving helpful, and the methodology to assess the area is not rigorous. CPRE recent research shows that such assessments are frequently over-estimated. Its legal status is unclear, and it cannot be relied upon to ensure effective strategies. The priorities are not sufficiently Hart-centric, and the presence of partnership arrangements may skew delivery or otherwise affect the results.

CPRE would wish to see Strategic Priorities that spring naturally from a new Vision for the District, rather than ones that are simply reiterations of concepts handed down through National Planning Policy Guidance.