

**Representations to the Draft  
Hart Local Plan: Strategy and  
Sites 2011-2032 (Regulation 18  
Consultation) April 2017**

**Land at Reading Road, Yateley**

*Our Ref: 7450*

**May 2017**



**bell cornwell**

CHARTERED TOWN PLANNERS

Bell Cornwell LLP, Oakview House, Station Road,  
Hook, Hampshire RG27 9TP

01256 766673 | [info@bell-cornwell.co.uk](mailto:info@bell-cornwell.co.uk) | [bell-cornwell.co.uk](http://bell-cornwell.co.uk)

## **CONTENTS**

<b>1</b>	<b>INTRODUCTION</b>	<b>2</b>
<b>2</b>	<b>THE VISION</b>	<b>3</b>
<b>3</b>	<b>SETTLEMENT HIERARCHY AND SETTLEMENT POLICY BOUNDARIES</b>	<b>4</b>
	SETTLEMENT POLICY BOUNDARY	4
<b>4</b>	<b>RESPONSES TO THE PROPOSED POLICIES AND SUSTAINABILITY APPRAISAL</b>	<b>7</b>
	POLICY SC5: LAND ALLOCATIONS FOR NEW HOMES	7
	SUSTAINABILITY APPRAISAL	9
<b>5</b>	<b>SUMMARY</b>	<b>11</b>

# 1 INTRODUCTION

- 1.1 We represent our client who owns land at Reading Road, Yateley. The land is highly suitable for housing given the strong connectivity of the site with the town centre area.
- 1.2 Overall our client's land ownership extends to approximately 1.2ha, which when assessed in detail results in a developable area of at least 0.9ha. The site is therefore capable of delivering up to 35 dwellings. The site has previously been submitted to the Council in respect of the Strategic Housing Land Supply Assessment process and representations have also been made by our client previously at the Refined Housing Options stage.
- 1.3 The site is referenced by the Council as 'SHL20', 'Land to the north of Reading Road'. The Council's own assessment of the site is that it constitutes a suitable site for development and that the deliverability of the site is such that it would secure such development within the short term (0-5 years). In terms of housing numbers, the Council's own assessment considers that the site would be capable of delivering 24 dwellings. As set out within our response to the Refined Options document, our client is satisfied that the appropriate range for the site falls within the range of 24-35 dwellings. Despite the clear suitability of the site for development, it has not however been allocated for housing within the draft Local Plan.
- 1.4 It is important to ensure that the Local Plan takes advantage of all suitable opportunities which are available for development and in particular, for it to support sustainable development opportunities which are located at its main settlements. This report therefore concludes by respectfully requesting that the site is duly instated as a proposed allocation at the next stage of the draft Plan.
- 1.5 Further justification for the proposed allocation of land at Reading Road, Yateley is provided within the following sections of this short report. For completeness, we have also provided a completed copy of the Council's response form.

## 2 THE VISION

- 2.1 The plan 's vision sits behind its proposed policies and allocations and gives an idea of how the Council considers the District will look at the end of the plan period. The vision that sets out that *“no place will have been excluded from appropriate and sustainable development simply because it lacked certain services or accessible infrastructure”*. The vision is therefore clear that appropriate and sustainable development should be supported within Hart District.
- 2.2 Whilst the vision sets out that the development of brownfield land will form the focus of the plan period, it also accepts that greenfield sites will form a necessary element of the spatial strategy. This approach is clearly accepted at Yateley where an allocation is proposed on the western edge of the settlement, which we will comment on in due course.

### 3 SETTLEMENT HIERARCHY AND SETTLEMENT POLICY BOUNDARIES

#### SETTLEMENT HIERARCHY

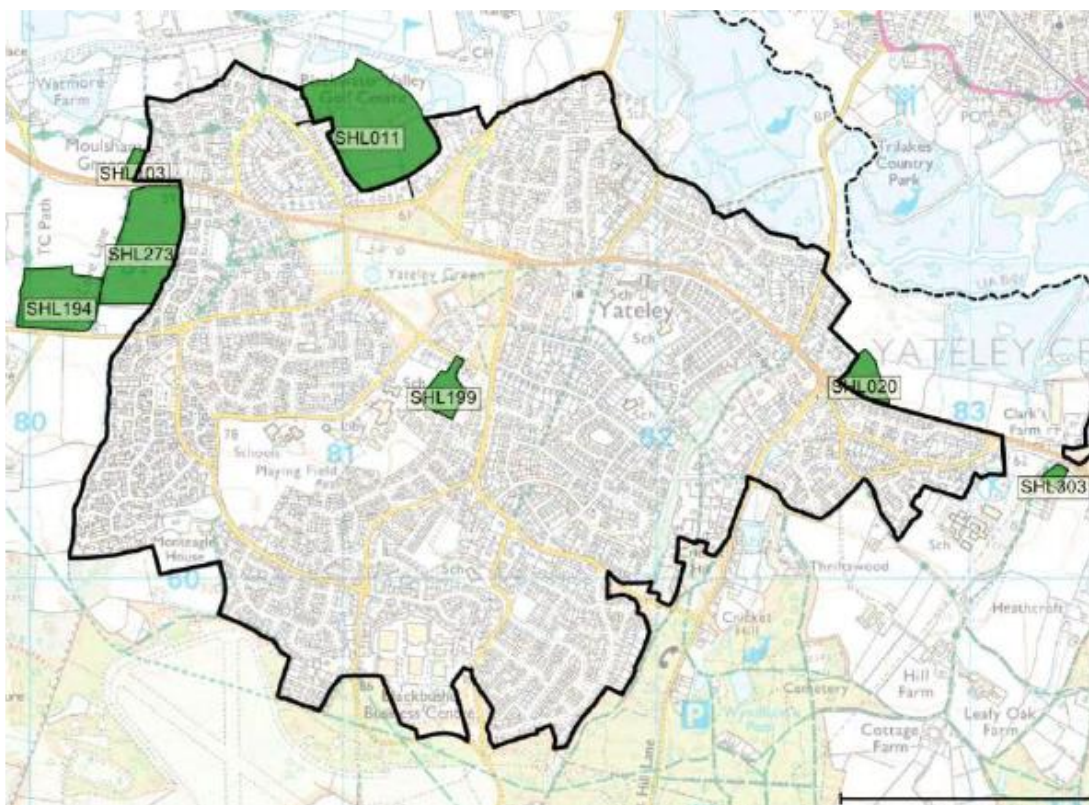
- 3.1 In general, we support the re-use of the Settlement Hierarchy for Hart District, 2010 in terms of the way in which settlements within the District are tiered according to their services and facilities. Within the hierarchy, Yateley sits as a Tier 2 Primary Local Service Centre settlement, along with Hook and Blackwater / Hawley. These settlements come second only to the Tier 1 'main urban area' of Fleet / Church Crookham.
- 3.2 Yateley is therefore recognised for its high levels of facilities and opportunities to sustainably access other locations. The settlement is therefore well placed to receive reasonably high levels of new development, the location providing very positive implications in terms of the social impacts of new development.
- 3.3 Paragraph 89 of the Draft Local Plan sets out that its approach is to direct development "to the most sustainable locations (Tier 1 to 4 settlements)". In the case of Yateley, we do not however consider that sufficient regard has been given to the sustainability credentials of the settlement and its capabilities for delivering higher levels of growth. The approach to the settlement vastly differs to the approach to Hook. By comparison, this same tier settlement which already has significant levels of commitments within its pipeline (incorporating major permissions and change of use from B1 schemes), will also see high levels of development placed within its Parish as a result of the proposed new settlement and on top of this Policy SC5 proposes to allocate a further 87 dwellings to be delivered via a Neighbourhood Plan. Whilst it is accepted that much of Hook's additional development relates to the Council's chosen approach to a new settlement (to which we do not object), the further allocation of 87 dwellings under Policy SC5 is not justified. We therefore consider that these numbers should be removed and re-directed to other alternative settlements and more specifically, Yateley.
- 3.4 Taking into account the development proposals of the plan as a whole and the spatial distribution of settlements within Hart, there is overall a very low distribution of the housing figures within the northern part of the District (particularly as the provision of numbers to Riseley will in practice be unlikely to contribute to Hart's own housing need). We also consider that of the figures distributed within the northern part of the District there is an unjustified distribution of a relatively high level of development to the Tier 4 settlement of Eversley.
- 3.5 In summary, whilst we agree that the settlement hierarchy accurately reflects the District, we do not consider that the proposed spatial strategy sufficiently accords with it and believe in the interests of sustainable development that it should.

#### SETTLEMENT POLICY BOUNDARY

- 3.6 At Yateley, we note that the draft Local Plan seeks to make a proposed change to the settlement policy boundary. The basis for this clearly relates to the development of the Hampshire Lakes Retirement Village, permitted in 2014. The proposed boundary change is immediately adjacent to our client's suitable SHLAA site.
- 3.7 Whilst we support the fact that a settlement boundary change in this area is appropriate to reflect new built development which forms part of the settlement, we strongly object to the proposed alignment of the boundary. This is due to the fact that the proposed change

illogically leaves out our client's site. Doing so is completely inappropriate, given that our client's site is surrounded by built development on three sites and will effectively end up as a little 'nook' in the settlement boundary.

- 3.8 The NPPF does not provide advice for plan-making in terms of the redefining of settlement policy boundaries. However, where changes are proposed, it should be necessary to ensure that such changes result in a logical boundary. Some of the advice relating to the setting of Green Belt boundaries is therefore the closest form of advice which could be logically applied. This advises local authorities to take account of the need to promote sustainable patterns of development and also for the LPA to satisfy themselves that changes to the boundaries will not again need to be altered at the end of the development plan, i.e. in instances where boundary changes are made, that the future-proofing of these has been considered.
- 3.9 As previously set out, Yateley is a highly sustainable Tier 2 settlement. Despite this, limited allocations have been proposed at the settlement, which we have already objected to. Assessing the context of Yateley further, the SHLAA demonstrates that there are in fact very few opportunities available at the settlement as shown on the map below.



- 3.10 Inevitably, our client's site which is located the closest to Yateley's district centre will at some point be successfully developed. Of the limited range of sites available, it is the most logical site to be allocated within this plan period at Yateley and would therefore constitute a 'quick win' for the Council of up to 35 dwellings, set in a location which is already subject to change through the implementation of the retirement scheme to the north. This current period of change on the eastern edge of Yateley demonstrates that now is an appropriate time for our client's land to also come forward.

- 3.11 We therefore seek amendments to the draft Plan to allocate our client's land for residential development and for the policy boundary which is already subject to change to incorporate our clients site. This will result in a more logical 'rounding off' to the boundary in this location. Retaining our client's land outside of the boundary despite the fact that it is surrounded on three sides by development is illogical in terms of delivering a revised boundary which is future-proofed from the need for further change.
- 3.12 Finally, with existing development extending further east of our client's land it is clear that the site does not contribute to the Gap between Yateley and Blackwater. Whilst gap policy is outdated and we therefore have fundamental objections to proposed policy MG6, if the Council is to persist with a gap policy, it is clear that in defining the boundary our client's site would not contribute to maintaining visual or physical separation of settlements. This is immediately obvious and therefore we would not support the matter having to wait until the precise boundaries of gaps are determined, which the emerging plan inappropriately suggests will be carried out in a further Development Management Policies plan. The lack of contribution the site makes to the proposed Gap again demonstrates the need for the Council to act now.

#### **HOUSING NEED AND THE PROPOSAL**

- 3.13 The background to the housing requirement commences on page 32 of the consultation document. This sets out how the housing need has been derived as a result of the findings of the Strategic Housing Market Assessment (SHMA) 2016. Paragraph 95 sets out that the 2016 SHMA identifies Hart's Objectively Assessed Housing Need (OAHN) to be 382 new homes per annum, equivalent to 8,022 new homes over the plan period (2011-2032). Further to this, we also note that the Council has taken a policy decision to include an additional uplift to the above figures to help them meet their priority need for subsidised affordable rented homes. This therefore means that the plan seeks to deliver 10,185 new homes over the plan period. Firstly, we support this uplift and consider the need for affordable housing justifies the proposed increase in the overall housing target.
- 3.14 We support the need for affordable housing within the District for those on low incomes and whilst the draft Local Plan seeks to provide for a rural exceptions policy, it is nevertheless the case that urban locations should provide the focus for delivering the majority of affordable homes. This again points to the unsuitability of the Eversley sites, which would see up to 50 new affordable dwellings provided that would be supported by very little infrastructure. By comparison our client's site would provide up to 14 affordable dwellings, located within walking distance to a wide range of services and facilities. The provision of additional affordable housing in a well-connected location is yet another element which weighs in favour of our client's sustainable site.

## 4 RESPONSES TO THE PROPOSED POLICIES AND SUSTAINABILITY APPRAISAL

### POLICY SC5: LAND ALLOCATIONS FOR NEW HOMES

- 4.1 Outside of the strategic sites proposed, there remains a need to deliver further housing within Hart. A total of 611 homes are proposed by means of extensions to smaller settlements, whilst a further 50 dwellings are proposed on rural exceptions sites (under Policy SC9) and a further 290 dwellings are anticipated to come from windfall sites.
- 4.2 In short, we object to Policy SC5 as it fails to distribute sufficient housing numbers to Yateley. We also strongly object to the proposed allocation of 'SHL272', 'Land between Eversley Road and Firgrove Road' for approximately 88 dwellings on the basis that it would present far greater impacts than the development of our client's land. These include adverse impacts relating to flood risk, reducing the limited separation between Eversley Cross and Yateley (which resulted in an appeal being dismissed on a significantly smaller site to the north, the land being currently designated as a Local Gap), proximity to Conservation Area, flood risk to the eastern side of the site (which would result in the proposed development being disconnected from the existing urban edge) and landscape issues. It is therefore unclear why the site has been selected ahead of our client's site.
- 4.3 As set out within our response to the settlement hierarchy we consider that the draft Local Plan fails to utilise the hierarchy effectively so as to disperse the residual housing numbers in a fair and reasonable manner. In particular we have noted in Section 3 of this report the disproportionate distribution of housing at Yateley compared to Hook, which sits in the same category. Additionally, in light of the low levels of planned development at the Tier 2 settlement of Yateley, we also do not consider some of the proposed allocations of Policy SC5 to be appropriate.
- 4.4 In particular we strongly object to the relatively high levels of development at the CEMEX sites in Eversley, which equate to 124 dwellings. Eversley is a small Tier 4 settlement, which has a limited range of facilities and therefore has a greater reliance on travel to other settlements (including Yateley) for day to day living. The allocation of these sites fails to recognise the inappropriate scales of each site compared to their host locations and the significant landscape and character impacts which would arise.
- 4.5 The larger CEMEX allocation is for 105 dwellings. As can be seen by the plan below the site significantly exceeds the scale of development which should be appropriate at Eversley Centre. It is grossly disproportionate and the large scale of the site cannot be justified in light of the suitability of alternative sites which are available within the District in more sustainable locations. The site is greenfield land as shown within the satellite image and the boundaries of the site are completely arbitrary, along with the boundaries of the housing areas shown on the proposed layout we have seen. We have significant concerns that the ability for the site to deliver SANG has been afforded too much weight in allocating the site, which in many other respects is highly inappropriate.





4.6 The High Level Assessment for the CEMEX A site notes a number of significant planning issues. These include:

- The inability of the local road network to support the level of housing proposed without the need for mitigation in the form of widening, which will have a negative impact on the existing character of the area. Furthermore, consideration must be given to whether it is an appropriate location in which to secure SANG which will be publically accessible and in addition to the residential traffic movement will attract further vehicle movements. There is also the recognised worsening of rat-run effect on supporting road networks and the general concern of the impacts that will occur on these roads by increasing traffic levels;
- Very limited bus services which are only offer a twice a day service on weekdays only. The proposal will therefore be heavily reliant on the private motor car, the high-level assessment setting out that the travel time to the nearest town centre (Yateley, via

walking and bus) is a 20-25 minute journey time, inevitably meaning that residents will make the 3-4 drive by private car;

- Proximity to overhead cables which affect the layout of the site;
- Capacity issues in terms of Primary School places at the only school within the settlement and the need to travel to Yateley for secondary school provision;
- Lack of healthcare provision and very limited retail provision which has to be accessed in Yateley;
- Loss of agricultural land
- Likely 'severe' visual impact and 'major' character impact which would require a 'medium' level of mitigation, making clear the level of intervention which is required in order to make the scheme 'acceptable'.

4.7 The above list is not by any means exhaustive, but nevertheless gives sufficient flavour of the inappropriate nature of the scheme and the high levels of technical planning matters associated with the site. Those relating to the complete lack of appropriate infrastructure clearly cannot be addressed with it being ironic that facilities in Yateley would in many instances be relied upon, whilst significantly lower levels of development are sought directly at the settlement.

4.8 Turning briefly to the CEMEX B site, we again strongly oppose the proposed allocation. Whilst being much smaller than CEMEX A (ie. 19 dwellings), the host location is again highly sensitive relating to an undeveloped field which currently forms the only form of separation which defines the separate settlement areas of Eversley Cross and Up Green. The proposed allocation therefore has significant implications in terms of the coalescence of existing settlements and the loss of the separate identities of these areas.

4.9 In addition to the above issues, the proposed allocation would also give rise to many similar infrastructure based concerns. Again, these would rely on the use of the private motor car. The scale of CEMEX B is comparable to our client's site at Reading Road, Yateley. Given the substantially higher sustainability credentials of our client's land, we strongly recommend the deletion of CEMEX B (and also A), and the subsequent allocation of our client's land. Critically, our client's proposal will also ensure the delivery of affordable housing in a sustainable location which does not rely on car ownership. Whilst the two CEMEX sites would deliver affordable housing, the quality of life for residents is likely to be severely impacted by the lack of accessible services.

## **SUSTAINABILITY APPRAISAL**

4.10 As set out within the accompanying Interim Sustainability Appraisal (SA), a dispersal method formed an important part of most of the spatial strategy options. When assessing the Sustainability Topic of housing in particular, page 76 of the SA sets out that Option 2 is the best performing of the options considered. This option consists of a new settlement at Murrell Green and "small sites". The small allocation of our client's site at Yateley would therefore fit with the best performing strategy option.

- 4.11 The SA also notes that a key consideration of any option was the need to ensure delivery of housing throughout the plan period, the allocation of small sites providing for sufficient housing delivery in the short term whilst the strategic sites come forward. The proposed allocation at Yateley as recognised by the SHLAA would be capable of contributing towards housing delivery in the short term.

## 5 SUMMARY

- 5.1 In summary, we agree with the broad nature of the spatial strategy which supports the development of small sites in a distributed manner across the District, in addition to the provision of a new settlement. However, we strongly object to proposed Policy SC5 which fails to make sufficient allocations in sustainable locations.
- 5.2 The proposed allocations do not effectively distribute housing numbers according to the Settlement Hierarchy and we consider this to be a significant flaw within the plan. The two greenfield sites proposed at Eversley which rely on Yateley for day to day services and facilities clearly demonstrates the inappropriate nature of these proposed allocations.
- 5.3 We have previously submitted our client's land under the Council's SHLAA process for a scheme of up to 35 units. The site would deliver housing (both open market and affordable housing) within a sustainable location close to Yateley Town Centre. This location is currently subject to significant change, a large retirement village being implemented to the north, with built development situated directly adjacent to our client's northern boundary. This results in our client's site being surrounded by development on three sides. To take account of the retirement village, the draft Local Plan proposes a change to the settlement policy boundary. This merely follows the unusual boundaries of the site. Given the enclosure of our client's land by built form, we consider that the boundary change should provide a more logical rounding off of the settlement boundary in this location which would also incorporate our client's available and suitable site.
- 5.4 In light of the above our response has set out the need for key amendments to the plan and in particular the re-drafting of proposed policy SC5. Most specifically we oppose the lack of allocation on our client's site in combination with the proposed allocation of less sustainable sites and respectfully request that these matters are addressed and our client's site allocated.