

5.1 INTRODUCTION AND HOUSING SUPPLY

Inspector's note

- 5.1.1 Many points raised in these objections are amplified in the Position Statements submitted for discussion at the Round Table Sessions (RTS) on housing supply and housing distribution. My recommendations below are therefore subsumed within those that follow my reasoning and conclusions on the RTSs. Nevertheless, I list the objections and briefly comment on them here as confirmation that all have been considered.

PARAGRAPH 5.1

Objections

First Deposit

1272/7414	East Hampshire Chamber of Commerce & Industry
1724/8576	Dr J Chatfield
1660/9813	Voluntary Action for East Hampshire

Main Issue

Whether housing should be provided to meet local labour market requirements.

Inspector's Reasoning and Conclusions

- 5.1.2 In principle, this provision should be made but the majority of existing and proposed dwellings will be bought and sold on the open market and there is a limit to the extent that a local planning authority can allocate housing to particular needs. This applies to both rural and urban areas. The **Voluntary Action for East Hampshire** asks for information about the cost of community infrastructure provided in tandem with the development compared with its cost when provided following its associated development. The inclusion of this information in the Local Plan, even if available at this stage, could unduly lengthen it, and it would be better to rely on policies for the provision of suitable community and other facilities reasonably required by the development. Agreements could specify the timing of the provision of infrastructure. That is what I envisage in my recommendations.

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- 5.1.3 **Dr Chatfield** refers to such matters as compact housing in towns and the need for suitable open spaces and landscaping in and around development schemes. These are important aspects in ensuring the efficient use of land and at the same time achieving a high standard of design. National and local policies are available to secure these

objectives, although much will depend upon the skill and commitment of developers and designers and the Council's staff and members to secure them.

Recommendation

5.1.4 I recommend that no modification be made to the SDDP.

OVERALL AMOUNT OF HOUSING PARAGRAPHS 5.2 AND 5.3

Objections

First Deposit

1011/6659	Miss G E Eiloart
1344/6924	Mr M J McNamara
1692/9285	Alton Friends of the Earth
1645/10258	Mr N D Paren

Main Issue

Whether the overall allocation of housing to East Hampshire should be challenged.

Inspector's Reasoning and Conclusions

- 5.1.5 I appreciate that many parties, including the Council, would prefer the District not to accommodate the Structure Plan allocation of housing. This is, however, an adopted plan that has been prepared in the context of Regional housing requirements. It must be the basis for the identification of sufficient land in the District for the number of dwellings specified.
- 5.1.6 The SDDP provides a useful summary here of the position, and I have proceeded on that basis.

Recommendation

- 5.1.7 I recommend that no modification be made to the SDDP.

SECOND DEPOSIT PARAGRAPH SD5.004

Objections

Second Deposit SD5.004

3891/11786	Mr & Mrs Bowden-Grindle
1620/13273	Whitehill Town Council
3820/14322	Dalton Warner Davis

Pre Inquiry Change PIC001.5

1953/15313	Hawthorne Kamm Ltd
3849/15412	Helical (Liphook) Limited

Latest Proposed Change

As set out in Document CD11/12 at PIC001.5 (page 76).

Main Issue

Whether the Local Plan should better reflect certain national policies.

Inspector's Reasoning and Conclusions

5.1.8 There is no need to add *balanced communities* to this paragraph as the **Whitehill Town Council** requests. The point, although relevant, is adequately covered elsewhere in my Report. The same applies to the requirement to adopt a search sequence, and the steps envisaged, in the identification of land for housing. In this respect, and in view of my recommendations throughout this Report, the Local Plan when adopted should suitably reflect national policies in both text and Proposals Map.

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5.1.9 **Mr & Mrs Bowden-Grindle** note that it would be useful for the electorate to be told about *brownfield sites*. The term is sometimes used colloquially as an alternative to previously-developed land which is defined in Planning Policy Guidance (PPG) 3 Annex C. I have relied upon this definition throughout the preparation of this Report, although the extent to which a site is previously-developed land can be a matter of judgement. The same applies to the extent to which it should be redeveloped, if at all.

Recommendation

5.1.10 I recommend that the SDDP be modified in accordance with the Latest Proposed Change (PIC001.5).

SECOND DEPOSIT PARAGRAPH SD5.006

Objections

Second Deposit SD5.006

1278/14635	CPRE
3834/11653	George Wimpey (UK) Ltd
482/14952	George Wimpey (UK) Ltd
1280/14956	George Wimpey (UK) Ltd

Main Issue

Whether too much, or not enough, land is allocated for housing to meet Structure Plan requirements.

Inspector’s Reasoning and Conclusions

5.1.11 I deal with this, and related issues, later.

Recommendation

5.1.12 I recommend that no modification be made to the SDDP.

PARAGRAPH 5.4

Objections

As set out in Annex at page 10.

Main Issues

- 1) Whether the SDDP suitably acknowledges the need to find reserve land for 1500 dwellings;
- 2) Whether the Council's estimates of the supply of land for housing are realistic.

Inspector's Reasoning and Conclusions

5.1.13 Paragraph SD5.008 is a useful addition to the First Deposit Draft Plan (FDDP) in that it takes account of Structure Plan Policy H4 that requires the identification of reserve land for an additional 1500 dwellings during 2001-2011. Presumably this addition, and the deletion of paragraph 5.4 in the FDDP, satisfies those parties who lodged objections on the basis that the FDLP did not acknowledge this later Structure Plan policy.

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5.1.14 I deal with the second issue in some detail later. This includes my assessment of the potential for housing development on land allocated for employment use.

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5.1.15 There are objections about such matters as the scale of housing development required in the District, the sources of supply and what are seen as the implications for particular settlements. I can add nothing to my conclusions above about the importance of the adopted Structure Plan, and I deal in more detail later in this Chapter with the components of housing supply and the various sites proposed for development in each of the settlements throughout the District.

5.1.16 **Mr Dry** says that the County Council should consider the building of a new town in the County rather than allowing the expansion of existing settlements. That is a matter more for the County than the District Council, although the Structure Plan does propose 4 Major Development Areas (MDA) to help to meet the County's long term housing needs.

5.1.17 **Erringham Investments Limited** refers to the need to make the fullest possible use of previously-developed land. I endorse that approach, although the exception to this principle will be where such land performs so poorly in relation to the criteria listed in PPG 3 paragraph 31 as to preclude its use for housing (within the relevant plan period or phase) before a particular greenfield site.

Recommendation

5.1.18 I recommend that no modification be made to the SDDP.

SECOND DEPOSIT PARAGRAPH SD5.008

Objections

1902/11672	Persimmon Homes & Martin Grant Homes Ltd
1863/11673	Persimmon Homes
3847/11674	Banner Homes
1899/12252	Bewley Homes Plc
1622/12376	English Nature, Hampshire & Isle of Wight
1289/12629	Hampshire Wildlife Trust
1874/12828	House Builders Federation
748/13246	Mr D Bridger
1293/13653	George Wimpey (UK) Ltd
3888/13877	Gammans and Claxon
1706/14101	Westbury Homes (Holdings) Ltd
3889/14143	Marechaux Ltd
1278/14638	CPRE (East Hampshire Branch)

Pre Inquiry Change PIC002.5

3946/15104	Mr R J Leonard
1620/15244	Whitehill Town Council
1899/15278	Bewley Homes Plc
3820/15295	Dalton Warner Davis
1885/15360	Fastnet Properties Ltd
1297/15368	Easterton Limited
1863/15367	Persimmon Homes
3847/15374	Banner Homes
1902/15378	Persimmon Homes & Martin Grant Homes Ltd
748/15382	Mr D Bridger
3856/15395	Mr R Smith & Persimmon Homes
1864/15401	Defence Estates
1071/15428	George Wimpey (UK) Ltd

Latest Proposed Change

As set out in Document CD11/12 at PIC002.5 (page 77).

Main Issues

- 1) Whether the supporting text should make clear that the identification of a reserve site should establish its general suitability for housing;
- 2) Whether East Hampshire District is appropriately included in *northern Hampshire*.

Inspector’s Reasoning and Conclusions

5.1.19 The fact that land is identified as a reserve site confirms that the Council considers that it has some advantages in terms of development but, whatever its ranking, that does not guarantee that development will take place. Should monitoring of completions throughout Hampshire, Portsmouth and Southampton demonstrate the need to release more land for housing, the reserve sites would be assessed on a comparative basis against both each other and any other land, previously-developed or otherwise and whether or not in East Hampshire. This other land might include surplus sites and/or buildings vacated by Defence Estates, the assessment of which might call for a review or alteration to the Local Plan. This the Council accepts.

5.1.20 Subject to a recommended minor modification that ensures that *only* qualifies not *be released*, but *if there is a compelling justification to do so*, the Latest Proposed Change suitably outlines the position, including its reference to the MDA reserve provision. I omit reference to **Defence Estates** land in my recommendation, as otherwise it would pre-suppose that this land was sustainable. The amount of it that might be made available, its location and degree of sustainability has yet to be assessed. There is no need for the set of criteria to which the **Whitehill Town Council** refers. The County Council’s Supplementary Planning Guidance (SPG) Implementing Policy H4 provides any further information that might be required.

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5.1.21 On the second issue, the Structure Plan includes East Hampshire District within *northern Hampshire* and it is not my task to review it. Nevertheless, I see nothing to prevent the County Council from having regard to Rowlands Castle should it be necessary to release reserve sites to accommodate growth in the south of the County.

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5.1.22 In principle, reserve sites should be released in a range of locations and sizes to meet a variety of needs. Even so, the comparative analysis to which I refer above should be made in the context of the criteria set out in PPG 3 paragraph 31.

5.1.23 Previously-developed land is not by definition sustainable in that it may be poorly located and the development of a greenfield site may be better. *Major sustainable releases of previously-developed land*, or similar, should stay.

5.1.24 I deal with particular settlements, and whether certain reserve sites should be baseline sites or given a different ranking, later in my Report.

Recommendation

5.1.25 I recommend that the SDDP be modified in accordance with the Latest Proposed Change (PIC002.5) apart from amending the first sentence as follows:

The reserve sites will be released for development only if there is a compelling justification to do so.....

and with:

.....If the release of a substantial amount of sustainable previously-developed land is proposed, a formal review of, or alteration to, the Local Plan may be required.

PARAGRAPH 5.5

Objections

First Deposit

1874/10145	House Builders Federation
1692/10354	Alton Friends of the Earth
1645/10357	Mr N D Paren

Main Issue

Whether the Local Plan adequately takes account of the most recent data and Structure Plan housing requirements.

Inspector's Reasoning and Conclusions

5.1.26 I deal with these and related matters in my examination of the supply of land for housing. I take account of the most recent evidence at the time of writing. As I mention in my letter to the Council's Chief Executive, the SDDP will have to be updated to reflect more recent data and other considerations.

Recommendation

5.1.27 I recommend that no modification be made to the SDDP.

PARAGRAPH 5.6

Objections

First Deposit

1276/6816	David Wilson Estates
1305/8901	Bovis Homes Limited (SE Region)
1978/8943	St Michael's Convent
1702/9531	Taywood & Wilcon Homes & Montacue Developments
1874/10146	House Builders Federation
1876/10165	Charles Church Developments
1878/10171	Prowing Projects Ltd
1929/10320	Danbuild Southern Ltd
1902/10326	Persimmon Homes & Martin Grant Homes Ltd
1071/10329	George Wimpey (UK) Ltd
1940/10333	Sainsburys Supermarkets Ltd
1890/10359	Coors Brewers Ltd
765/10364	Mr & Mrs B Lanaghan

Main Issue

Whether the Council has identified sufficient land for housing.

Inspector's Reasoning and Conclusions

5.1.28 I deal with this, and the underlying assumptions made, in my examination of the supply of land for housing.

Recommendation

5.1.29 I recommend that no modification be made to the SDDP.

SECOND DEPOSIT PARAGRAPH SD5.011

Objections

As set out in the Annex at page 12.

Latest Proposed Change

As set out in Document CD11/12 at PIC003.5 (page 77).

Main Issue

Whether land at Ramshill in Petersfield and Chase Road Lindford should be regarded as commitments.

Inspector's Reasoning and Conclusions

5.1.30 The objections relate to a number of matters, including the increased number of dwellings proposed at Ramshill and the lack of facilities at Lindford. In May 2002 the Council resolved to grant planning permission for 276 (274 net) dwellings at Ramshill subject to the applicant entering into a Section 106 Agreement. Planning permission was issued in February 2003 and at the time of writing the scheme is well under way. The objections have therefore been superseded by events and the 274 dwellings should count towards the supply of land for housing during the plan period.

5.1.31 Land at Chase Road Lindford is allocated for residential development in the extant adopted Local Plan and has been the subject of a planning application. In my examination of particular sites, I recommend that it be retained for this purpose and thereby that it make a substantial contribution towards the provision of housing in the District.

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5.1.32 Other matters concern the supply of housing in the District and the extent to which it is considered likely to fall short of Structure Plan requirements. I deal with them in some depth later in my Report. My recommendations supersede the Latest Proposed Change (PIC005.5).

Recommendation

5.1.33 I recommend that no modification be made to the SDDP.

PARAGRAPH 5.7

Objections

First Deposit

1296/6872	Merlion Land Ltd
1616/7582	Mr C H Josephi
837/8318	Mrs J Josephi
1295/8111	Landspeed Development Consultancy
1926/9176	Squires Bridge Homes Ltd
1942/9382	The Bell Cornwell Partnership
1944/9416	Redrow Homes (SE) Limited
1945/9420	Bryant Homes and J S Bloor (Newbury) Ltd
1946/9424	Old Road Securities PLC
1947/9443	Redrow Homes (SE) Ltd & Persimmon Homes (South Coast) Ltd
1702/9530	Taywood & Wilcon Homes & Montacue Developments
1873/10133	Laing Homes Ltd
1874/10147	The House Builders Federation
1878/10172	Prowting Projects Ltd
1960/10278	Liss Village Design Group
1864/10289	Defence Estates
965/10316	Mr W A Morgan
1868/10318	Lady H M Richardson
1929/10322	Danbuild Southern Ltd
1921/10325	Rydon Homes Ltd
1902/10327	Persimmon Homes & Martin Grant Homes Ltd
1071/10330	George Wimpey (UK) Ltd
1978/10332	St Michael's Convent
1940/10334	Sainsburys Supermarkets Ltd
1305/10336	Bovis Homes Limited (SE Region)
1276/10337	David Wilson Estates
1890/10360	Coors Brewers Ltd
765/10365	Mr & Mrs B Lanaghan

Main Issue

Whether the allowance for unidentified sites as a component of housing supply should be based upon past rates of development.

Inspector's Reasoning and Conclusions

5.1.34 This paragraph is deleted in the SDDP. I deal later with windfall sites, other components of the supply of land for housing and related issues. I also take account of the Structure Plan requirement for reserve allocations.

Recommendation

5.1.34 I recommend that no modification be made to the SDDP.

SECOND DEPOSIT PARAGRAPH SD5.013

Objections

Second Deposit

3875/11763	The Mills & Carey Families
1623/12209	Hampson Holdings Limited
1899/12242	Bewley Homes Plc
1926/12284	Squires Bridge Homes Ltd
1928/12429	Cala Homes (South) Ltd
1932/12482	Allison and Garwood Ltd
1945/12667	Bryant Homes and J S Bloor (Newbury) Ltd
3822/12702	Mr J Harris and Mrs M Ball
1950/12704	Linden Homes Southern Ltd
1951/12757	The Davey Family
1874/12857	The House Builders Federation
706/12943	Kebbell Homes
748/13249	Mr D Bridger
1902/13295	Persimmon Homes & Martin Grant Homes Ltd
1863/13308	Persimmon Homes
3847/13325	Banner Homes
3856/13594	Persimmon Homes
1293/13678	George Wimpey (UK) Limited
3886/13751	Squires Bridge Homes / Wates Landmark
3888/13882	Gammans and Claxon
1706/14103	Westbury Homes (Holdings) Ltd
3889/14145	Marechaux Ltd
1952/14397	Rowlands Castle Brickworks (Successions) Ltd
3824/14453	Hawthorne Kamm Ltd
1302/14573	Mr R Northcott
3825/14642	Phillips Build Ltd
1278/14663	CPRE (East Hampshire Branch)
1292/14850	Bentley Parish Council
3827/14869	Breamore Developments
1696/14878	Village Green Plc
3841/14895	Mr K Oliver / Taylor Woodrow

Main Issue

Whether the Council is placing too much reliance upon windfall sites and the future rate of completions upon them.

Inspector's Reasoning and Conclusions

5.1.36 Again, I deal with these matters in some detail later, and upon the basis of more up to date information. My recommendations therefore supersede the Latest Proposed Change (PIC005.5).

Recommendation

5.1.37 I recommend that no modification be made to the SDDP.

SECOND DEPOSIT PARAGRAPH SD5.015

Objections

Second Deposit

1926/12286	Squires Bridge Homes Ltd
1932/12483	Allison and Garwood Ltd
1945/12668	Bryant Homes and J S Bloor (Newbury) Ltd
1950/12705	Linden Homes Southern Ltd
3822/12703	Mr J Harris & Mrs M Ball
1951/12758	The Davey Family
1874/12859	The House Builders Federation
706/12945	Kebbell Homes
3946/13213	Mr R J Leonard
748/13250	Mr D Bridger
1902/13296	Persimmon Homes & Martin Grant Homes Ltd
1863/13309	Persimmon Homes
3847/13327	Banner Homes
3856/13596	Persimmon Homes
1293/13679	George Wimpey (UK) Ltd
3886/13757	Squires Bridge Homes / Wates Landmark
3888/13883	Gammans and Claxon
1706/14105	Westbury Homes (Holdings) Ltd
3889/14146	Marechaux Ltd
1952/14402	Rowlands Castle Brickworks (Successions) Ltd
3824/14455	Hawthorne Kamm Ltd
3825/14643	Phillips Build Ltd
3827/14870	Breamore Developments
1696/14879	Village Green Plc
1931/15147	Secretary of State for Health
3886/15264	Squires Bridge Homes / Wates Landmark
1899/15282	Bewley Homes Plc
1953/15316	Hawthorne Kamm Ltd
3856/15392	Persimmon Homes
1071/15431	George Wimpey (UK) Ltd

Latest Proposed Change

As set out in Document CD11/12 at PIC005.5 (page 79).

Main Issue

Whether the Council's assumptions about the contribution of sub-divisions of dwellings to the supply of land for housing, even though revised downwards, are realistic.

Inspector’s Reasoning and Conclusions

5.1.38 Once more, this is a matter that I consider in more detail later. I take the view that there is no double-counting of sub-divisions and schemes on windfall sites.

Recommendation

5.1.39 I recommend that no modification be made to the SDDP.

SECOND DEPOSIT PARAGRAPH SD5.016

Objections

As set out in the Annex at page 17.

Latest Proposed Change

As set out in Document CD11/12 at PIC006.5 (page 79).

Main Issue

Whether the Council's assumptions about the contribution to housing requirements from large unidentified windfall sites is realistic, and whether the calculations for it accord with national advice.

Inspector's Reasoning and Conclusions

5.1.40 Again, these are matters to be examined in more depth later. I do so on the basis of more recent data, including that made available at and following the first part of the Round Table Session (RTS) on Housing Supply. I conclude that a more reliable estimate can be made of this component of the supply of land for housing.

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5.1.41 With regard to Bentley and Farringdon, I conclude on their suitability or otherwise for housing when I come to examine the objections to development there. Briefly, neither settlement is suitable for a significant increase in residential development. I examine the Council's strategy for the location of development in my conclusions following the RTS on Housing Distribution. This includes an examination of the important relationship between location and previously-developed land.

5.1.42 The Latest Proposed Change updates an estimate.

Recommendation

5.1.43 I recommend that the SDDP be modified in accordance with the Latest Proposed Change (PIC006.5).

PARAGRAPH 5.8

Objections

First Deposit

1874/10148	House Builders Federation
1878/10173	Prowting Projects Ltd
1929/10323	Danbuild Southern Ltd
1902/10328	Persimmon Homes & Martin Grant Homes Ltd
1071/10331	George Wimpey (UK) Ltd
1940/10335	Sainsburys Supermarkets Ltd
1276/10338	David Wilson Estates
1890/10361	Coors Brewers Ltd
1874/15439	House Builders Federation
1926/12296	Squires Bridge Homes Ltd
1928/12434	Mr M Emett
3822/12713	Mr J Harris & Mrs M Ball
748/13261	Mr D Bridger
1902/13298	Persimmon Homes & Martin Grant Homes Ltd
1863/13311	Persimmon Homes
3847/13329	Banner Homes
3856/13622	Mr R Smith & Persimmon Homes
1293/13671	George Wimpey (UK) Ltd
3886/13764	Squires Bridge Homes / Wates Landmark
3888/13885	Gammans and Claxon
1706/14107	Westbury Homes (Holdings) Ltd
3889/14148	Mr A Patrick
3820/14324	Dalton Warner Davis
1278/14664	CPRE (East Hampshire Branch)

Main Issue

Whether a flexibility allowance should be added to the various estimates of the supply of land for housing.

Inspector’s Reasoning and Conclusions

- 5.1.43 This paragraph is deleted in the SDDP. This allowance was, however, another matter discussed at the RTS on Housing Supply. I conclude that, owing mainly to the emphasis in Government policy on “plan, monitor and manage”, such an allowance should not be made.
- 5.1.44 **Dalton Warner Davis** suggests that paragraph SD5.018 be amended by the addition of: *However, additional housing land may be released to meet local needs.* I do not agree. It would introduce too much vagueness into the Local Plan. It would be better to estimate as accurately as possible the components of the supply of land for housing and then to allocate sufficient land to meet Structure Plan requirements.

Recommendation

5.1.45 I recommend that no modification be made to the SDDP.

SECOND DEPOSIT PARAGRAPH SD5.018

Pre-Inquiry Change PIC007.5

Objections

1706/15021	Westbury Homes (Holdings) Ltd
3888/15022	Gammans and Claxon
3889/15023	Marechaux Ltd
1931/15149	Secretary of State for Health
3886/15266	Squires Bridge Homes / Wates Landmark
3820/15280	Dalton Warner Davis
1899/15284	Bewley Homes Plc
1874/15300	House Builders Federation
1953/15317	Hawthorne Kamm Ltd
568/15340	Cove Construction Ltd
1297/15370	Easterton Limited
3856/15394	Mr R Smith and Persimmon Homes
3849/15414	Helical (Liphook) Limited
1071/15433	George Wimpey (UK) Ltd

Latest Proposed Change

As set out in Document CD11/12 at PIC007.5 (page 80).

Main Issue

Whether additional greenfield land should be allocated for development to meet Structure Plan requirements.

Inspector's Reasoning and Conclusions

- 5.1.46 I deal with all the components of the supply of land for housing later. I conclude that, subject to my more detailed conclusions later, the amount of land that the Council proposes to be allocated for residential development is about right. I deal with objections to the allocation, or non-allocation, of particular sites later.
- 5.1.47 The Latest Proposed Change is an up-date. I deal with the components of the supply of housing later, and my calculations and recommendations supersede those set out in the Latest Proposed Change. At this stage in my Report, therefore, I do not recommend a modification.

Recommendation

- 5.1.47 I recommend that no modification be made to the SDDP.

HOUSING REQUIREMENTS 1996 TO 2011 (PIE CHART)

Objections

As set out in the Annex at page 19.

Latest Proposed Change

As set out in Document CD11/12 at PIC004.5 (page 78).

Main Issue

Whether the Council's estimates of the components of the supply of land for housing are realistic, and hence whether sufficient greenfield land is allocated for that purpose.

Inspector's Reasoning and Conclusions

- 5.1.48 Again, this is a matter examined in some depth at the RTS on Housing Supply. I assess all the components and conclude that more recent data demonstrate that the contribution from some components should be modified. I also conclude that the amount of greenfield land that the Council proposes to be allocated should be increased somewhat to meet Structure Plan requirements.
- 5.1.49 Again the Latest Proposed Change is an update, and it is superseded by later recommendations concerning the supply of land for housing. And so again at this stage I do not recommend any modification.

Recommendation

- 5.1.50 I recommend that no modification be made to the SDDP.

HOUSING DISTRIBUTION STRATEGY

PARAGRAPH 5.10

Objections

Second Deposit SD5.019

1289/11535	Hampshire Wildlife Trust
1622/12317	English Nature, Hampshire & Isle of Wight
1645/13721	Mr N D Paren
1646/13791	Mrs M A Paren
3962/14221	The Petersfield Society
1868/14773	Lady H M Richardson

Main Issue

Whether the Council should undertake a “shadow appropriate assessment” of the proposed allocations.

Inspector’s Reasoning and Conclusions

5.1.50 I agree with the **Hampshire Wildlife Trust** and **English Nature** that heathland habitats can be sensitive to the indirect, as well as the direct, effects of residential development. Any proposals that might affect sites that are so important that they are designated under European legislation should be the subject of especial scrutiny. This might include a shadow assessment.

5.1.51 These habitats should continue to impose a substantial constraint upon development in terms of both strategy for the location of development and in the assessment of land for housing and for other purposes. This is the Council’s general approach and I support it. The scrutiny should be continued at the planning application stage with an assessment where appropriate in accordance with the Birds and Habitats Directives and any other requirement.

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5.1.52 Another important constraint on development is the Area of Outstanding Natural Beauty (AONB). I have taken this into account in assessing the proposed allocations and the ranking that should apply to them when held in reserve, as well as in the case of other sites that various Objectors suggest as allocations. Other objections relate to previously-developed land and its suitability or otherwise for residential development. I deal with this matter in my consideration of the points made at the RTS on Housing Distribution and in other representations.

Recommendation

5.1.53 I recommend that no modification be made to the SDDP.

PARAGRAPH 5.11

Objections

As set out in the Annex at page 21.

Latest Proposed Change

As set out in Document CD11/12 at PIC008.5 and PIC009.5 (pages 80 and 81).

Main Issue

Whether the Council's strategy for the location of development is in line with national policy, including the search sequence and the emphasis that should be placed upon such constraints as the AONB.

Inspector's Reasoning and Conclusions

- 5.1.55 Again, these are matters that I examine in my conclusions following the RTS on Housing Distribution. All I would say here is that previously-developed land is not always in a sustainable location in terms of accessibility to jobs, services and facilities and so is not always suitable for re-use for housing. The retention of land in its existing use for employment may be preferable to its redevelopment for housing.
- 5.1.56 **Sainsburys Supermarkets Ltd** suggests an addition to paragraph 5.11 to confirm that a sequential assessment has been made of all brownfield sites in the District. The text does, however, adequately make this point, and I see no need for elaboration. It suitably reflects national policy in PPG 3, and in any event this remains a material consideration in the determination of planning applications for residential development. Of particular importance in my assessment of the Council's strategy in the location of development are the 5 sustainability criteria set out in PPG 3 paragraph 31.
- 5.1.57 Some of these objections relate to particular settlements and sites. I deal with them later in my Report, stressing where relevant the importance of the AONBs.

Recommendation

- 5.1.58 I recommend that the SDDP be modified in accordance with the Latest Proposed Change (PIC008.5 and PIC009.5).

PARAGRAPH 5.11 ii)

Objections

Second Deposit SD5.028

1945/12671 Bryant Homes and J S Bloor (Newbury) Ltd
3841/14904 Taylor Woodrow

Pre-Inquiry Change PIC009.5

1706/15025 Westbury Homes (Holdings) Ltd
3888/15027 Gammans and Claxon
3889/15029 Marechaux Ltd
3849/15416 Helical (Liphook) Limited

Latest Proposed Change

As set out in Document CD11/12 at PIC009.5 (page 81).

Main Issue

Whether sufficient emphasis has been placed upon Petersfield and Alton as the main centres in the District and hence on their suitability to take the greater part of the housing allocations.

Inspector's Reasoning and Conclusions

5.1.59 I agree that in such terms as population and range of services, these 2 towns are the most important in the District. That is a useful criterion in assessing their suitability for further development. They do, however, have other important attributes that must be taken into account, as I explore in my adjudication on those objections that relate to them. In that context, it is better to refer to *the largest settlements* than just to *Petersfield and Alton*. That is what the Latest Proposed Change does, and I have already endorsed it.

Recommendation

5.1.60 I recommend that the SDDP be modified in accordance with the Latest Proposed Change (PIC009.5).

FIRST DEPOSIT POLICY H1

Objections

As set out in the Annex at page 23.

Latest Proposed Change

As set out in Document CD11/12 at PIC012.5, PIC011.5, PIC010.5 and FPC37 (page 81).

Main Issue

Whether the SDDP suitably accords with national policies, particularly those that encourage all aspects of sustainability, and with Structure Plan policies especially those that require the allocation of sufficient land in East Hampshire for residential development.

Inspector’s Reasoning and Conclusions

- 5.1.61 These are matters that go to the heart of the Local Plan and were discussed in considerable detail at the Round Table Sessions on Housing Supply and Housing Distribution. I report, conclude and recommend on those representations and proceedings later.
- 5.1.62 Some of these objections refer to particular settlements and sites. I adjudicate on them when I examine the Council’s proposed allocations, both Baseline and Reserve Sites, and the Omission Sites that are put forward as alternatives or in addition to these proposed allocations. Again, my recommendation here is subject to my later recommendations concerning particular sites. I recommend against the allocation of land at Clements Close, Binsted and so I do not endorse PIC011.5 or PIC012.5.
- 5.1.63 **Mr Spiers** refers to the need for services, especially those provided by the County Council, to be commensurate with the scale of new development. The adopted Local Plan must be in accordance with the County Council’s Structure Plan and, as the District Council points out, *such services as police and education are within the remit of the County Council and issues relating to their provision should be addressed directly to the County Council.*

Recommendation

- 5.1.64 I recommend that the SDDP be modified in accordance with the Latest Proposed Change (PIC010.5 and FPC37).

SECOND DEPOSIT PARAGRAPH SD5.043

Objections

As set out in the Annex at page 26.

Latest Proposed Change

As set out in Document CD11/12 at PIC012.5 (page 81).

Main Issue

Whether sufficient land is being allocated for residential development, in line with national policies concerning, for example, the emphasis to be attached to an Urban Housing Capacity Study and the re-use of previously-developed land.

Inspector’s Reasoning and Conclusions

5.1.65 Again, these are matters that I deal with later. I note here, however, that Pennsfield in Petersfield is greenfield land as well as the sites at East Meon and Havant Road, Horndean. I examine this consideration in my adjudication of the objections lodged to the allocation of these sites. Once more, my recommendation here gives way to later ones concerning these other sites. Suffice it to repeat here, however, that I do not endorse the Latest Proposed Change (PIC012.5).

Recommendation

5.1.66 I recommend that no modification be made to the SDDP.

HOUSING ALLOCATIONS

POLICY H1

Objections

As set out in the Annex at page 27.

Latest Proposed Change

As set out in Document CD11/12 at PIC016.5, FPC38, FPC53, FPC38, PIC014.5, PIC015.5, FPC38, PIC018.5 and PIC020.5 (pages 84, 85 and 86).

Main Issue

Whether sufficient land for Reserve Sites is provided, and in line with national policies concerning the location of development.

Inspector's Reasoning and Conclusions

5.1.67 Again, I deal with these matters later in my examination of the supply and distribution of land for residential development and in my adjudication of the site-specific objections.

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5.1.68 On other matters, I see no need for the addition that the **Hampshire Constabulary** suggests about encouraging developers to apply to the Police Architectural Liaison Officer for certification under the “Secured by Design” scheme. In their preparation of a development brief, the parties will, or should, have regard to Circular 5/94 Planning Out Crime and they would be free to discuss this matter with the Officer. There is no need to labour the point in the Local Plan.

5.1.69 I agree with the **Defence Estates** that *larger* housing site allocations should be defined so that it is clear when a masterplan would be expected. The SDDP assists in its reference to 10 or more dwellings, although I consider that the text could be made a little clearer. It would not preclude the Council’s reasonably expecting a masterplan or development brief being prepared where appropriate for smaller schemes.

5.1.70 The **Horndean Parish Council** requests re-instatement of the text at SDDP paragraph 5.11.(ii) that states that *Horndean has experienced recent high levels of development and needs a period for community integration*. That would suggest, however, that it should not take any further significant amount of development. As I explain later, I do not accept the implication and so this text should not be re-introduced.

5.1.71 The **Hampshire County Council** suggests an addition to PIC020.5 referring to *public services such as education, libraries and social services*. Whilst there would be nothing wrong with such a modification, I do not consider that it would add much to

the Local Plan. It would, however, be included in the more embracing text of my recommendation.

- 5.1.72 The Latest Proposed Change updates the Council’s stance on various matters, and my endorsement of it at this stage in my Report must give way where appropriate to later recommendations concerning particular sites and the number of dwellings that it is reasonable to assume could be provided on them.

Recommendation

- 5.1.73 I recommend that the SDDP be modified in accordance with the Latest Proposed Change (PIC016.5, FPC38, FPC53, FPC38, PIC014.5, PIC015.5, FPC38, PIC018.5 and PIC020.5) apart from:

Paragraph 5.14

For all allocations for 10 or more dwellings, the developer will be expected to produce a comprehensive masterplan for the whole site to show how the scheme would function in itself and as part of the settlement.

Paragraph 5.15

Development briefs.....will be updated as necessary, taking account of community needs, public services and national planning policies.

THE SUPPLY OF LAND FOR HOUSING

Objections

As set out above where relevant and in the Annex and the Appendices, including those of Objectors represented at the Round Table Session (RTS) on this topic.

Latest Proposed Change

As set out on previous pages.

Main Issue

Whether the assumptions that the Council makes about the components of this supply are realistic and hence whether sufficient land is being put forward for residential development.

Inspector's Reasoning and Conclusions

Introduction

- 5.1.74 I opened a RTS on this subject on 9th September 2003 and it continued on 10th September 2003 and 30th March 2004. The Notes of, and arising from, the first 2 days of that Session are at Appendix G. In framing these Conclusions and Recommendations, I have taken account of the matters discussed at the RTS, the Position Statements prepared for it by the participants and other relevant written representations that Objectors and the Council have made. These include the representations made at, and arising from, the re-convened RTS on 30 March 2004. I have borne in mind national and regional planning policies, including the need for local planning authorities to identify an adequate and continuous supply of housing land to meet future requirements that is both available and sustainable.
- 5.1.75 I deal here solely with numbers of dwellings. My conclusions in this part of my Report should not be taken as an endorsement of any baseline or reserve allocation that the Council proposes. Conclusions and recommendations on particular sites come later, in Chapters 5.3, 5.4, 5.5, 5.6 and 5.8 of my Report.

Structure Plan Requirements

- 5.1.76 The Hampshire County Structure Plan 1996-2011 (Review), adopted on 27 March 2000, is the strategic framework for the provision of land for housing in East Hampshire. Significantly, it points out that there is no area where disagreement is more dramatic than in the issues raised by the need to allocate more land for housing. East Hampshire, and the preparation of a Local Plan for this District, is no exception to that statement. The Structure Plan encourages the most efficient use of the existing stock of housing, but accepts that this source of supply will not be sufficient to accommodate all the needs of the County by 2011. It complements national advice by promoting the recycling of previously-developed land, but realises that it will be necessary to use some

greenfield land to meet these urgent requirements. Criteria for these allocations are at its paragraph 232 and I explore them in more detail later in my Report.

- 5.1.77 Policies H2 and H4 set out the phasing of land for housing in the form of a baseline and a later reserve provision. In this way "plan, monitor and manage", as national policy requires, can be undertaken at both the County and District level. The Local Plan period is the same as that of the Structure Plan, and the District Council must make provision for baseline and reserve allocations so as to ensure, with existing commitments etc, the completion of 5,500 and 1,500 dwellings respectively during those 15 years. This requirement is not a matter to be disputed by way of objection to the Local Plan. The emphasis is thus on delivery and completions rather than the mere provision of land. The Structure Plan does not identify any particular year at which the baseline provision in terms of house completions must be met. Therefore, for overall Structure Plan requirements, I pay especial attention to the total of 7,000 dwellings in the matter of general conformity of the Local Plan with the Structure Plan.
- 5.1.78 It is clear from Government pronouncements that there is an urgent need in the County, and by implication every District within it, for the provision of more and sufficient land for housing. For example, the letter of 21st May 2003 from Lord Rooker to County Councillor Mr K B Estlin raises the spectre of ministerial intervention if significant improvement in the performance of the County in terms of completions does not occur. But I do not regard the total requirement, or either of its 2 parts, as a definite and precise target to be met at all costs. General conformity falls short of exactness, and so a judgement must be made about the extent of flexibility that should be applied to the requirements. At the RTS the **Hampshire County Council** suggested 100 dwellings either way, although there appears to be no formal resolution or advice to that effect. It amounts to no more than 1.82% and 1.43% of the 5500 baseline and 7000 total respectively. The District Council says that it would feel *hard done by* if certification were refused on the basis that its housing provision was up to 5% above or below Structure Plan requirements. That is a reasonable approach, and I adopt it. It implies ranges of 5225-5775 and 6,650-7,350 dwellings for baseline and total provision respectively.
- 5.1.79 The Leaders of the 3 strategic authorities met the Minister of State for Housing and Planning in March 2004. It was agreed that there was no need to release the reserve provision at this stage, but that an Action Plan be prepared within a month in conjunction with the Government Office, to set out the steps that need to be taken over the next year to raise housing supply and to instil greater confidence in future forecasts of that supply. Discussions have been taking place between the Council and the **Government Office for the South East** on the delivery of housing in the District. A Housing Action Plan will be agreed with the Government Office which will consider a range of actions by the Council, Government Office and the industry to achieve a better rate of house completions (Document RTS4/EHDC/1). It is clear from this that all parties acknowledge the urgency of the situation. Nevertheless, none of these ministerial pronouncements or worthy intentions either invalidates or supersedes the adopted Structure Plan. General conformity with the Structure Plan is a requirement of primary legislation, and I agree with the Council and the **Hampshire County Council** that the greater weight should at present be attached to it. The Council's latest estimate of the supply of housing is set out in its memorandum of 21st January 2004 and the table attached to it. In terms of general conformity with the Structure Plan, it is significant that the **Hampshire County Council** agrees with it.

- 5.1.80 The County Council’s Supplementary Planning Guidance (SPG) Implementing Policy H4 neither alters nor rewrites this Policy. It states that decisions on whether any of the reserve land should be released in response to monitoring will be influenced by the Government’s Regional Planning Guidance. If some of the reserve provision is to be released, the planning authorities will decide in which District it will take place. “Reserve Housing Provision” is defined as housing provision additional to baseline housing provision that will be released for development if monitoring and RPG require it. These considerations raise the possibility of one or more reserve sites in East Hampshire being found not to be needed during the plan period. In those circumstances, planning permission might presumably be refused for their development and they would not appear as an allocation or similar in a reviewed, altered or new plan. The County Council’s consultative Policy H4 Monitoring Paper 2004 (Document CD6/8) states that there appears to be no compelling justification to release any of the housing reserve provision at present, and in view of my estimates and recommendations on particular sites, I accept that conclusion.
- 5.1.81 In its letter of 29th October 2003, the **House Builders Federation** (HBF) says that it is not a case of if the reserve sites will need to be released, but when. Bearing in mind the pressures for development in the County, Structure Plan and regional policies and the limited amount of previously-developed land genuinely available at present, I accept the possibility that some, perhaps most, of the reserve sites in East Hampshire will have to be released for residential development at some stage in the future. But I do not lose sight of the explanatory memorandum to Structure Plan Policy H4. This states that the need for allocations of land to be released to accommodate this reserve provision will be determined by the local and strategic planning authorities in the light of policies in revised RPG 9.
- 5.1.82 The strategic planning authorities will support the release of individual greenfield allocations to meet this reserve provision only where monitoring of the Structure Plan and Local Plans indicates that there is a compelling justification to do so. That is not the same as saying that every reserve site in every District will definitely be released, and prospective developers should note this important caveat as they investigate and prepare schemes for land of this status. The prospect of previously-developed **Defence Estates** land at Whitehill/Bordon becoming available is an important consideration that may make the development of greenfield land elsewhere in the District unnecessary for the foreseeable future.

Housing Completions 1996-2003

- 5.1.83 Monitoring by the Hampshire County Council establishes that in East Hampshire there were 2120 net completions between 1996-2003. This figure is derived from 1910 net completions during the period 1996-2002 (Document CD 16/3), plus 127 completions from small windfall sites and 83 completions from large windfall sites during 2002-2003 (Document RTS1/23/EHDC/2). The total figure of **2120** is not challenged and I use it in my calculations.
- 5.1.84 I share the participants’ and other Objectors’ concern about the historically low completions rate. When this is compared with the average annual number of completions required to meet the Structure Plan requirement there is an obvious implication of a serious under-performance in house building that demands urgent

attention. The **House Builders Federation**, along with many other Objectors, shows that the residual requirement to meet the baseline target equates with a completion rate of 422.5 dwellings per annum (dpa) for the remainder of the Local Plan period. Between 1996-2003 completions averaged 302 dpa, falling to 210 dpa in 2002-2003. These calculations show that this most recent figure is about half the rate of future development required just to meet the baseline Structure Plan requirement to 2011. The situation becomes substantially worse when the reserve site requirement is taken into account.

- 5.1.85 The Council suggests a number of reasons to explain this worryingly low rate of completions. These include bad weather, a shortage of skills in the development industry, reorganisation in the industry and longer periods of construction. I find it difficult to accept that the weather in Hampshire has been so bad that, by itself or combined with other factors, it accounts for a low completions rate since 1996. It is hard to see how it could have been so different from other areas in the South East where the problem of low completions has not been of the same magnitude. On skills shortage, I accept that there are no constraints within the industry that would prevent the achievement of a somewhat higher rate of completions. I am not convinced, however, that the industry could immediately adapt to providing about twice as many dwellings each year without serious repercussions elsewhere in the County and perhaps beyond it. That conclusion accords with the report in *The Observer* of 27th July 2003 that builders had told the Chancellor of the Exchequer that they could increase capacity by only 10% a year (15,000 on 150,000).
- 5.1.86 I do not dispute the **House Builders Federation's** view that the local housing market over the last few years has been buoyant. There is no conclusive evidence to show that developers are holding large land banks in the District, as the Council agrees. The high cost of purchasing land with planning permission would make such action increasingly uneconomical. Firm evidence on this matter, however, is scant and conflicting. According to *Planning*, 26th September 2003, the HBF has admitted that developers may be holding back sites because they are worried about future land supply. That accords with the view of the Royal Institution of Chartered Surveyors (RICS), reported in *Planning* on 22nd August 2003, *that the argument is gaining ground that it is the house builders rather than the planning system who are controlling supply and releasing homes at the level that suits them best, in line with their obligations to shareholders*. The Chartered Institute of Housing expresses a similar view.
- 5.1.87 The alternative view expressed at the RTS is that the present record national shortage of available land is set to fuel the continued property price boom. **Persimmon Homes**, for example, is reported as saying that it is selling from about 10% fewer outlets as a result of the continuing difficulties and delays in obtaining detailed planning permissions for its developments. I am told that the position in the District is much the same, although it appears to me that some of the delays with regard to particular sites are not entirely of the Council's making. I also bear in mind that some of the factors that have led, and are likely to continue to lead, to a low rate of completions are outside the control of the District and County Councils, the industry and the planning system in general. Changes in interest and mortgage rates often have considerable influence on housing land supply and completions. A significant increase in allocations, in other words, would not necessarily result in a substantial increase in completions.

- 5.1.88 The Council's up-dated figures do indicate an increase in completions on small windfall sites and a significant increase in permissions on both small and large windfall sites, particularly the latter. Not surprisingly, the figures do not show a clear correlation or long-term trend between permissions and completions. In some cases, there have been substantial delays from allocation to construction. For example, the First Review of the Local Plan, adopted in February 1998, allocated land for residential development at Ramshill (Petersfield), Chase Road (Lindford) and at Farringdon Mill. Yet it is only at Ramshill that completions are making a useful contribution to local housing needs. Even so, the latest completion figures and the progress that the Council reports on the sites at Lindford and Farringdon Mill (Documents CD16/3 and Notes on the RTS on Housing Supply) indicate that the foreseeable outlook for completions is healthier.

Outstanding Large Site Permissions at April 2003

- 5.1.89 The Council's up-dated figures for outstanding large site permissions presented at the RTS comprise 274 dwellings at Ramshill and the 211 new large windfall permissions (Document CD 16/3). Its subsequent changes indicate a total of 872 units made up from the original 'corrected' figure of 902 with the deduction of 30 theoretical completions at Ramshill to eliminate double counting. This figure is challenged on two main grounds. Firstly, it is argued that 64 dwellings from a permission granted after April 2003 had been incorrectly included in it. This refers to the former County Highways Depot, Paper Mill Lane, Alton (a site identified in the up-dated figures of draft new housing permissions on large windfalls sites 2002/2003) for which planning permission was granted on 10th September 2003.
- 5.1.90 Secondly, it is suggested that a 10% non-implementation allowance should be applied to account for the uncertainty surrounding particular sites. This approach, however, is superseded by the advice in PPG 3 about "plan, monitor and manage" and is re-enforced with the Structure Plan requirement for the identification of reserve sites. This strategy should serve to anticipate and make good any substantial shortage in the supply of dwellings. Furthermore, I accept that there should be some flexibility in meeting the Structure Plan requirement, up to 5% either way. Nor has there been any compelling evidence to demonstrate the existence of a constraint so crucial as to render the development of any of these sites so unlikely within the Local Plan period that its contribution to supply should be ignored.
- 5.1.91 The Council advises that its estimates should be treated as a minimum because subsequent permissions have resulted in more dwellings than originally permitted and the same could happen elsewhere. But development has already started or is complete on most of these sites (Document RTS1/23/EHDC Appendix 1) and I doubt whether there is much opportunity to increase the permitted number of dwellings. It is reasonable to presume that any remaining sites, especially those for which planning permission was granted after March 2000 when PPG 3 was issued, already make the most efficient use of the land.
- 5.1.92 Since the first 2 days of the RTS, the Council has updated this estimate following finalisation of the figures with the Hampshire County Council. Although the number of dwellings eventually completed may not be the same as a result of revised plans, I consider that the number of dwellings expected at any one time is more a matter of facts than speculation. I do not doubt that the Councils have taken into account matters

discussed at the RTS, nor do I doubt their ability to ascertain these facts, as at March 2003. I accept their conclusions and I adopt their figure of **917** dwellings from outstanding large site planning permissions.

Small Windfall Sites

- 5.1.93 The Council regards a small site as one that is capable of accommodating no more than 9 dwellings. This is a reasonable approach. Windfall sites are defined in PPG 3 as those that have not been specifically identified as available in the local plan process. They comprise previously-developed sites that have unexpectedly become available. I adopt this definition, as well as the advice that local planning authorities should allow for them in the future on the basis of examining past trends and on the likely windfall potential as assessed in a capacity study. Past trends, however, are not always plain to see and potential is not the same as actual development. The prediction of future windfalls is thus fraught with difficulty. Any particular annual average prediction of future completions is bound to be somewhat arbitrary and must be treated with caution. The need for regular and frequent monitoring is evident.
- 5.1.94 Planning permissions on small windfall sites have increased from for 86 dwellings in 1997/98 to 165 dwellings in 2002/03 (Document CD 16/3 Table 2). In this case an increasing trend can be identified, but whether or not it will continue must be a matter of some speculation. Significantly, Tapping the Potential (DETR December 2000) states that even in areas with intense, sustained development pressures there has been no evidence that some sources of capacity are drying up. There is, however, a host of reasons why a planning permission does not always translate into completions and why lengthy delays in implementation sometimes occur. For example, it is sometimes sought to establish the value of land. It is therefore better to rely upon trends in completions than on permissions granted.
- 5.1.95 National policy encourages generally higher densities, although the scope for doing so on small sites is limited. If the more attractive sites tend to be developed first and only the more difficult ones now remain, it would be reasonable to expect a decrease in the number of dwellings permitted and completed each year. Nevertheless, the Urban Housing Capacity Study (UHCS) suggests a potential of as many as 1,020 dwellings on small windfall sites. But from my examination of, and recommendations concerning, the 35 additional Settlement Policy Boundaries (SPB), and especially the way in which they should define the mainly built up areas, I am not persuaded that many more dwellings could reasonably be expected from this source. Issues of sustainability, conservation and character may be more important in individual proposals and preclude the generation of the significant new opportunities that the Council expects. The re-use of previously-developed land and/or its inclusion within a SPB may not always outweigh those considerations. I think that the Council is being a little optimistic in the contribution that it expects from permissions granted on sites within this greater number of SPBs.
- 5.1.96 Completions on small windfall sites were as high as 132 in 1997/98 but fell markedly to only 54 in 1999/2000. They then rose to another peak of 127 in 2002/03 (Document CD 16/3 Table 1). As only 2% are estimated to be on greenfield land, this consideration makes little difference to the calculations. Whether completions will continue to increase, or fall as they did after 1997/98, is again very much a matter of speculation. There may be reasons for the trough of 1999/2000 like a shortage of

skilled labour and of a shortage of small sites with planning permissions at a given time. As intimated above, I do not recall any weather during the last 5-6 years being so bad that it could have had a substantial adverse effect upon house building. It is generally agreed that the housing market in East Hampshire is buoyant and there is no convincing evidence to suggest that the conclusion in Tapping the Potential about sources of capacity not drying up does not apply to this District. I therefore think it reasonable to suppose that permissions for dwellings on small sites are likely to be followed by an increased rate of implementation.

- 5.1.97 The Council estimates an allowance for windfalls on small sites of 920 dwellings from April 2003 to the end of the Plan period, an annual average of 115 dwellings (Council's Memorandum of 21st January 2004 to the Programme Officer). Tapping the Potential identifies various sources for windfalls, and the Council has generally followed its approach. Living Over The Shop (LOTS) is one of them, and the Council assumes 23 dwellings in the overall allowance, or about 3 each year. These conversions from business to residential use are not always straightforward, and I am told that Inland Revenue rules can limit the number of these changes. As more people seem to me to be working from home and thus vacating this accommodation, and in view of national policy to encourage the better use of buildings, there may be some more scope for this source to contribute to local housing needs. Perhaps 30, not 23, dwellings would be a more realistic assumption and that is the one that I make.
- 5.1.98 I think that there is little, if any, scope for barn and similar conversions to add to the supply of housing, as **CPRE** suggests. During the past 6-7 years, this source has accounted for between 6 and 20 new dwellings each year. The emphasis in local and national policies is for retention or conversion of these buildings for employment uses, and I see no justification for changing the Council's estimates on this basis. **CPRE** further proposes that an allowance be made for bringing empty dwellings back into occupation. I disagree. An empty dwelling is already a dwelling and would have been taken into account as part of the estimates of the existing housing stock.
- 5.1.99 Sub-divisions could continue to contribute to the supply of housing. Records indicate a net annual addition of 5 dwellings, although the Council expects this to increase to 10 each year after the adoption of the Local Plan. I have my doubts. I see no compelling reason why it should do so, although much may depend upon financial advantage. But I am not convinced that significantly more owners will wish to see their houses converted to flats. There is a finite number of dwellings suitable for this change of use, and this suggests that fewer remain to be converted. And pressures for on-street parking spaces may be a significant constraint in some urban parts of the District. Again, potential is not the same as completion. I think it more realistic to assume that the current rate will continue.
- 5.1.100 From all the evidence submitted to the Inquiry, and from my inspections throughout the District, I consider that most of the dwellings from small windfall sites will result from the re-use of urban land in the larger settlements and a modest increase in density than might previously have been expected. Despite all the uncertainties in prediction, the Council should be encouraged by the 127 completions and 165 permissions on small windfall sites in 2002/03 (Document CD 16/3 Table 2). The possible shortening of the life of planning permissions to 3 years may be effective in turning more permissions to completions. Nevertheless, the unpredictability of this source of supply demands caution in estimating its contribution.

- 5.1.101 From the Council's estimate of 920 dwellings from April 2003 to the end of the plan period, I deduct 30 to account for my doubts about SPBs and I add 7 for LOTS. That equals 897 dwellings. The Council estimates that 70 dwellings will result from subdivisions, but I think that 55 would be more realistic and so requiring a reduction of 15 dwellings from the Council's total. The total small windfall allowance including subdivisions is therefore 882, say **880**, or 110 dwellings each year.
- 5.1.102 Just before the last "sitting" day of the Inquiry, the **Government Office for the South East** informed the Council that *no allowance for windfalls should be made when calculating the number of dwellings that should be shown on the Proposals Map. However, if windfalls are being realised as anticipated then not all of the sites allocated on the Proposals Map will be needed during the plan's first five years.* The Council rejects this advice and, in my view, rightly so. It implies more land being allocated on the Proposals Map to compensate for the loss of the contribution made by windfalls, putting at risk general conformity with the Structure Plan. It implies further delays in the plan-making process to accommodate all the necessary publicity and consideration of objections lodged against the additional allocations.
- 5.1.103 That delay would aggravate the Minister's concern that he expressed to the Leader of the **Hampshire County Council** in his letter of 3rd February 2004 *that insufficient progress has been made on local plans and large sites.* It would seriously undermine the ability to bring forward baseline sites that are intended to provide urgently needed housing. That would be contrary to the view expressed by the Government Office in its letter of 25th February 2004 to the **Hampshire County Council** that *delays to the plan preparation process are preventing housing sites coming forward.* Authorities should make specific allowances, PPG 3 says, for all the different types of windfalls in their plans. That is precisely what the Council has done, and I support its approach.

Large Windfall Sites and the Urban Housing Capacity Study (UHCS)

- 5.1.104 In coming to a conclusion on the amount of land in the urban areas likely to come forward for development, it is important to assess the potential of sites in particular and sources in general. That is the main purpose of an UHCS. These Studies are at the heart of the "planning for housing" process and form the basis for both the sequential approach and the managed release of sites. The Council's Study (Document CD 16/2) has attracted criticisms in its approach, but in my opinion there is a limit to the amount of work and detail that should reasonably be expected from such a survey. A market assessment was made, in that the Council took account of the District's prosperity and its usually buoyant housing market. Environmental matters were considered and no site was felt to be so constrained so as to affect its viability.
- 5.1.105 The house building industry was consulted on the Study undertaken in 2000/01 and its comments were taken into account and changes made to the preparation of the 2002 Study. The **House Builders Federation** says that it has already submitted many comments to the Council on the urban capacity assessment work as it has evolved. It is clear, however, that the industry considers that more consultation and joint working should have taken place. I accept that more could have been done in this respect, but I am not persuaded that this has invalidated the broad conclusions of the later Study or led to unreal expectations about the development of particular sites. The owners of large back gardens were not approached, but I agree that that could have led to

unnecessary local apprehension. The Council was right in its decision not to consult them.

- 5.1.106 The Council's assumptions about the range of densities are reasonable, especially so with the greater emphasis being placed upon the more efficient use of land for housing. Actual densities on each site will vary according to many factors. These include the character and appearance of the locality, the location of the site and such constraints as Tree Preservation Orders and the protection of residential amenity. Greater precision can be achieved only as a result of the detailed assessment more appropriate to a planning application, and it would be unreasonable to expect it at this stage. The Council has taken the matter of density as far as is appropriate for a Study of this nature.
- 5.1.107 The UHCS identifies an unconstrained capacity of 1,486 dwellings comprising 1,025 from identified sites and 461 from rear gardens. With an average discount to 75% and 70% respectively, this suggests a constrained capacity of 1,092 dwellings (769 + 323). This discounting should take into account constraints, possibly insurmountable ones, applying to some sites, perhaps including some or all of those identified by **Robert Shaw and Partners** (Document RTS1/1/1302) and by **Barton Willmore Planning** (Document RTS1/1/13/3849). The Council reduced this estimate of 1,486 dwellings to 1,074, then to 1,020 and then to 904. The latest estimate of 820 dwellings takes account of possible double counting of outstanding large site permissions and the estimate of dwellings coming from the large windfall sites. It should also assist where there are doubts about the categories to which various aspects of supply should be assigned. Therefore, the Council says, the first year from April 2003 counts as zero (Memorandum to the Programme Officer of 21st January 2004). This is a cautious, conservative approach. It serves to fend off any criticism of lack of realism, and I support it.
- 5.1.108 The above discount rates are well within national guidance in Tapping the Potential. Significantly, the **Hampshire County Council** states in its letter of 22nd January 2003 that the UHCS is one of the better examples to be found in the County at present and that it is well-structured and easy to understand, with clear schedules and maps. This conclusion is not qualified by reference to any strategic perspective. It adds that the assumptions upon which it is founded are sound, and the dwelling figures shown to be robust. Apart from my reservations below about rear gardens, I agree with this critique.
- 5.1.109 I accept the broad thrust of the UHCS conclusions, but I have my doubts about 461 dwellings, discounted to 323, that might be built in rear gardens. I admire many of the large gardens in the District, and perhaps residents value them more than the Council assumes. I would! I would expect some reluctance by owners to have their gardens developed, especially if that seriously reduced the value of their dwellings. The unwillingness of just one owner could undermine an entire scheme. Difficulties of land assembly could cause significant delays or completely thwart development, although that does not appear to be a problem at the Council's allocation south of Winchester Road, Four Marks. I would expect from my own experience that most of the dwellings coming forward from this source would be in ones and twos, not in tens or more, but for consistency with the Council's estimates I include them in my assessment of large windfalls. An estimate is again difficult to make with confidence, but I assume 40 or so fewer dwellings than does the Council, say 285.

- 5.1.110 Tapping The Potential outlines 2 methods for exploring the potential to use sites more efficiently. These are the density multiplier and the design based approach. The advantages of the latter are described. Significantly, it points out that many of the studies that have used the former as the main yield assessment tool have produced more conservative estimates for sites than the site potentials arrived at through Sustainable Residential Quality (SRQ). This is because the latter is site specific, more accurate and can investigate site potential more thoroughly. The Council’s emphasis on the density approach may, therefore, underestimate potential. The Guidance also refers to yardsticks and assumptions, and that reinforces my conclusions on the nature and purpose of these Studies.
- 5.1.111 The process of assessing urban capacity must be readily understandable, transparent and rigorous. Nevertheless, it is unlikely that the same depth of analysis would be given to every site by all the parties as would be the case if it were the subject of a planning application. Assumptions must be made about developability, market viability, local character and planning standards that may or may not turn out to be accurate. And so I would not expect an UHCS to guarantee the precise number of dwellings that a certain number of sites would deliver by a certain time. That would be unrealistic and unreasonable. Instead, it should seek to estimate a broad indication of the contribution that urban areas would be likely to make towards overall housing requirements. That is what the Council’s Study does, and it is a useful basis upon which to proceed.
- 5.1.112 Permissions on large windfall sites have varied considerably since 1997/98. Apart from a fairly consistent fluctuation from one year to the next, I can identify no obvious trend. These permissions accounted for only 25 dwellings in 2001/02 but were as high as 211 in 2002/03, an annual average of 105 (Document CD 16/3 Table 3). The size of these sites and the effect on the figures of just one or 2 permissions presumably account for much of this variation. I note, for example, from below Table 7 in Document CD 16/3 that permissions were granted for 45 and 47 dwellings on large housing sites (including windfalls) at Alton (former County Highways Depot) and Bordon (West of St Lucia Lodge) respectively during 2002/03. Similarly, the net completions on these larger sites varied from only 83 in 2002/03 to as many as 297 in 2000/01, an annual average of 191 (Document CD 16/3 Table 7). This record emphasises the unpredictability of supply and contribution to housing requirements from this source.
- 5.1.113 During 1997/98 and 2001/02, the average annual number of dwellings permitted on large windfall sites was 84. Some Objectors say that current national policy giving priority to previously-developed land and promoting higher densities on this and other housing land should be regarded as no more than a continuing trend instead of a departure from previous guidelines. To some extent, that is true. But the emphasis on these higher densities as set out in PPG 3 and the Council’s commitment generally to seek them convinces me that this is an important factor in my expectation that permissions for more dwellings will be granted during the rest of the plan period than has been the case in recent years. As I say, the Council suggests 820 dwellings from this source, from which I deduct 40 from the allowance from the large gardens. That is **780** dwellings, or an average of 97 each year from April 2003. There was an encouraging number of dwellings (211) permitted in 2002/03 and this implies that the estimate that I adopt is cautious and conservative. As with the small windfall

allowance, it is what Tapping The Potential defines as an informed estimate. That is as certain as it can be.

- 5.1.114 Several additional sources of capacity are suggested. Land allocated, at present under-used or previously used, for employment purposes sometimes has an initial and beguiling attraction for potential housing and/or mixed-use schemes. But its retention can also serve to protect jobs or have the potential to provide for them. This is important in both urban and rural areas because it provides opportunities for people to work near where they live and thereby reduce the need to commute, especially by car. Loss of local jobs can be especially harmful to the life of a rural community. There may be some examples where a change of use to housing can be justified, but I agree with the Council that the scope for residential development on employment land is limited. I suspect that it is very limited. Any cases where it might occur should be subsumed within the estimates for small and large windfalls.
- 5.1.115 The redevelopment of car parks is cited as another possible source of supply, although there are no proposals at present for any such schemes. I would not rule out this possibility, perhaps coming to fruition towards the end of the Local Plan period. Nevertheless, the current improbability means that no allowance should be made for it. The viability of town centres and the effect upon their character and appearance would need careful consideration. Much the same applies to existing areas of low-density housing. There are no definite proposals for redevelopment at higher densities and this, coupled with the length of time likely to be taken from the beginning to the end of the process, convinces me that no allowance should be made for it. One of the options in the Drum Housing Association Newsletter of 19th September 2003 for the Grange Road, Borough Grove and Highfield Road area of Petersfield is to leave the gardens, public open spaces and roads as they are. That, as well as the early stage in the consultation process, underlines my conclusion. The note of 19 March 2004 from the Drum Housing Association, submitted by **CPRE**, does not materially change the situation.
- 5.1.116 I deal in more detail elsewhere with the **Defence Estates** land at Whitehill/Bordon. Despite the likely environmental and nature conservation constraints that apply, some of this land may become available for development towards the end of the Local Plan period. As I conclude above, a significant amount of it could trigger a review of, or alteration to, the Local Plan. This is an approach that the **Whitehill Town Council** and others support. Matters are far from definite at present, with no request from the **Defence Estates** for an allocation of any of its land. In present circumstances, therefore, it would be wrong to presume that this land will make a significant contribution to the supply of housing in the foreseeable future. But it might. The position is well summarised by **Rydon Homes Ltd**: *the brownfield credentials offered by Bordon Garrison, albeit not as yet fully assessed and identified, represent only one planning consideration and does not make Bordon an automatic selection in preference to other reserve and objection sites, even those that are greenfield*. I acknowledge the potential of **Defence Estates** land, a potential that would need to be assessed in the light of extant national, regional and local policies. I do not, however, include any such contribution in my estimates although I accept that some infilling or similar might take place as windfalls.
- 5.1.117 Planning in East Hampshire will not stop in 2011, and one must look to the longer term future. Large amounts of previously-developed land coming forward as part of a

Masterplan for much or all of Bordon/Whitehill could make this settlement a more sustainable and attractive place for a wide range of investment, including better public transport links to nearby towns. That is a valid point that the **Whitehill Town Council** makes. Furthermore, I agree with this Council that the release of the Louisberg Barracks, or a similar area, *as a windfall site would prejudice the masterplanning process by which it is hoped that Whitehill/Bordon could become a sustainable settlement.* The point is well made.

- 5.1.118 On the face of it, it would seem better to build on this previously-developed land at Bordon than to release greenfield reserve land that is a valuable part of the attractive rural settings of these delightful East Hampshire towns and villages. That is especially so where services and facilities are more limited than they are at Bordon. I would therefore urge the relevant parties to press on with their investigations of this land and plans for it as a matter of the utmost urgency. Provided that environmental constraints are not shown to be overriding, its potential to contribute to the housing and other requirements of the District is considerable. The Council should constantly and rigorously monitor progress.
- 5.1.119 It is useful to clarify here the matter of the existing 536 family dwellings at Bordon Garrison and the other 34 dwellings that have been sold or leased to the Pavillion Housing Association. The Council confirms that they are part of the existing housing stock. Should any of them be redeveloped, only a net increase in the number of dwellings would count towards the supply of housing for Structure Plan purposes. Similarly, if there were to be a net loss of dwellings after any redevelopment, there would be an equivalent loss in seeking to meet requirements. The shared barracks accommodation is different. That is regarded as an institutional use, and any conversion to dwellings would count positively towards Structure Plan requirements. The Council helpfully explains the position in its letter of 20 May 2004, and it is convincing.

Outstanding Allocations

- 5.1.120 In the Housing Supply Topic Paper (Document CD 16/3), the Council identifies 3 outstanding allocations. Planning permission was granted in February 2003 for 274 (net) dwellings at Ramshill, and this commitment is now in the category of Outstanding Planning Permissions. The 2 remaining sites are Chase Road (Lindford) and Farringdon Mill (Lower Farringdon), expected to contribute 165 (155 net) and 20 dwellings respectively. I say that in the knowledge of the planning application made in September 2003 for 207 dwellings at the former. Outstanding allocations should provide **175** dwellings, as the Council confirms, but the actual figure may be higher.

Baseline and Reserve Provision

- 5.1.121 My estimates and assumptions set out above suggest that the various components of housing supply could result in a total of **4872** dwellings. This is 628 less than the baseline requirement of 5500 and it still leaves a need for another 1500 dwellings on reserve sites. As a result of its Latest Proposed Change to Table H1 (Document CD11/12 page 81), the Council proposes the allocation of mainly previously-developed land for a baseline provision of 700 dwellings. On the very doubtful assumption that I will recommend no modification of the SDDP in so far as allocations and omission sites are concerned, this brings the total supply of dwellings up to **5572**, a baseline

surplus of 72. As a result of the Latest Proposed Change to Table H2 (Document CD11/12 page 84) the Council's reserve sites would account for **1440** dwellings (not 1380 as in the table). It should be 1500 and hence there is a deficit of 60. There is thus a total surplus of 12 dwellings, well within both margin of error and the tolerance that general conformity with the Structure Plan allows. But my recommendations concerning objections to the proposed allocations and those made on the grounds that other sites should be identified for housing have substantial implications for that initial conclusion.

- 5.1.122 There are other matters relating to reserve sites. The **CPRE** maintains that to identify them on the Proposals Map would make it difficult to prevent planning permissions being granted for their development. I do not agree. The identification of reserve sites is a Structure Plan requirement and the Proposals Map should acknowledge it. The supporting text explains the status of these sites and explains that their development is not a foregone conclusion. Some Objectors call for the inclusion of Reserve Sites within Settlement Policy Boundaries. Owing to their limited status and hence the greater uncertainty as to their development during the Plan period or beyond it, I do not support these representations. I agree with the Council, for the reasons that it gives in Document CD11/12 FPC48, that these sites should be outside the boundaries and that policies for the safeguarding of the countryside should apply to them pending any release.
- 5.1.123 The **CPRE** further suggests that the Local Plan contain a de-allocation or review policy for greenfield reserve sites. However, the Structure Plan advises that the strategic planning authorities will support the release of individual green field allocations to meet the reserve provision only where monitoring of the development plan indicates that there is a compelling justification to do so. The County Council's Supplementary Planning Guidance (SPG) Implementing Policy H4 states that the release of reserve provision would not necessarily be in the same Districts as the identified shortfall in housing supply.
- 5.1.124 Plans should be regularly reviewed to provide an opportunity to re-assess existing site allocations where development has not yet been given planning permission. The inference is that allocations no longer needed would be omitted from the reviewed plan. It might be appropriate to allocate more sustainable alternative site or sites elsewhere, perhaps including previously-developed land. **Defence Estates** land at Bordon might be an example. This is the thrust of much of other parts of **CPRE's** case, but the development plan system already ensures that review can lead to omission, affirmation or alternative provision. The **Hampshire County Council** rightly states that this is little more than sensible, good planning practice. There is no need to modify the SDDP by including a policy for the "de-allocation" of sites.
- 5.1.125 Regular monitoring on a County-wide basis, including the preparation of more or updated UHCSs, should include an assessment of the availability of previously-developed land in sustainable locations. Should significant amounts of it be identified in the main urban areas like Portsmouth and Southampton, there would be less need to release greenfield reserve sites in East Hampshire. This would better accord with the Government's objective of achieving 60% of additional housing by 2008 on previously- developed land and with the advice on page 6 of Tapping The Potential. Should less previously-developed land than expected be found in these cities, however, there might be a case for finding more greenfield reserve sites in the more rural parts of

the County, including East Hampshire. Only time, and monitoring, will tell. In the meantime, the inevitability of the development of these reserve sites should not be presumed. They should not, therefore, be given the greater certainty of being included in SPBs. That is the Council's stance, and I support it.

- 5.1.126 It is important to guard against the provision of too much greenfield land for housing, to meet either baseline or reserve requirements. Although there is a variety of developers in the house building industry, it is fair to presume that the development of greenfield land will usually pose fewer problems than will previously-developed land. Too generous a provision of the former could thwart the re-use of the latter, contrary to Government objectives. Allocations of greenfield land should be based upon a careful assessment of need, thereby focussing as much attention as possible on previously-developed land and its beneficial re-use. Again, I support the Council's approach in this regard. And again my attention turns to the potential of Bordon.

Flexibility Allowance

- 5.1.127 It has not been unusual in the past for local planning authorities to apply this allowance to their estimates of housing supply. Often it has been 10%. Its purpose has been to allow for the non-implementation of some planning permissions by allocating more land than is necessary to meet requirements. As mentioned above, the more recent policy of "plan, monitor and manage" with its emphasis on effective monitoring of performance and regular review of the plan, makes this allowance unnecessary.

Densities

- 5.1.128 National policy in PPG 3 is that more efficient use should be made of land and a range of densities is set out that should help to achieve this aim. However, national advice also recognises that density considerations should be informed by the wider context and should respect and enhance local character.
- 5.1.129 About 40% of the District lies within the AONB and there are proposals to designate a South Downs National Park that might coincide with much of this Area. East Hampshire contains a range of settlements with varying local characteristics, but it is fair to conclude that its existing urban and suburban development is generally of low density. A balance must be struck between the need for higher densities and the protection of character. These competing objectives could lead to some tension, but in my judgement the Council has generally got the balance right.
- 5.1.130 With regard to allocated sites, the expected densities and number of dwellings should be treated as an indication of the capacity of the site, but not necessarily as its minimum. Whilst site capacity could very well be increased in the light of negotiations at the planning application stage, the opposite might also be the case. I accept the Council's estimates as reasonable, although sometimes perhaps a little conservative, and I proceed on that basis.
- 5.1.131 The CPRE considers that the densities used in the UHCS are at the lower end of the range advised in PPG 3 and low when compared with the neighbouring authority of Havant. Districts vary in character, however, and so I place little weight on that comparison.

Previously-developed land

- 5.1.132 This is a matter that I explore in more detail in my examination of the distribution of housing land. I note again here, however, that PPG 3 gives priority to the re-use of this type of land in urban areas except where sites perform so poorly in relation to the criteria listed in its paragraph 31 as to preclude their use for housing before a particular greenfield site. The re-use for housing of previously-developed land is not, therefore, always sustainable.
- 5.1.133 It should not be for an applicant to demonstrate to the Council’s satisfaction that there are not enough previously-developed sites and empty or under-used buildings suitable for residential use before planning permission should be granted for development on other land. I agree with **Martin Grant Homes**, **Persimmon Homes** and other Objectors that this is a matter properly to be undertaken by the Council in discussion with the house builder and other interested parties. The Council rightly proposes the deletion of Criterion 1 in paragraph SD5.044.

Balance

- 5.1.134 From my conclusions above, I estimate the supply of housing as follows.

Total Housing Supply 1996-2011

A.	Dwellings built 1996-2003	2,120
B.	Outstanding Large Site permissions	917
C.	Small Windfall Site Allowance	880
D.	Large Windfall Site Allowance	780
E.	Outstanding Allocations	175
F.	Council’s Baseline Allocations	700
Baseline Total		5,572
G.	Council’s Reserve Sites	1,440
GRAND TOTAL		<u>7,012</u>

- 5.1.135 As I indicate, this is comfortably within the range that I set out at paragraph 5.1.78, and I regard it as realistic. Objectors’ representations concerning housing supply range from a deficit of 1000 (Chancellors on behalf of **Persimmon Homes SE Ltd**, **Taylor Woodrow** and **Martin Grant Homes**) to a surplus of 938 (**CPRE**). In its letter of 25th February 2004 to the Programme Officer, the **House Builders Federation** estimates a deficit of 700-750 dwellings. I do not support these estimates. Subject to some relatively minor amendments, the Council’s estimates are realistic. I estimate a slight surplus of 12 dwellings (7012-7000) which compares with the Council’s estimated Grand Surplus (note attached to Memorandum of January 21, 2004 from Mr Speirs) of 98.
- 5.1.136 That means that the Council is proposing the allocation of just about enough land for residential development. But to avoid any doubt at this point, I must emphasise that this conclusion relates solely to numbers of dwellings. It must not be taken as endorsement of any particular baseline or reserve allocation that the Council proposes,

or indeed of rejection of any of the Omission Sites that are proposed in addition, or as alternatives to, the Council's proposed allocations.

- 5.1.137 By the time that the Council receives this Report, more accurate estimates of planning permissions granted and dwellings built should be available. A case in point is Chase Road Lindford where a planning application for 207 dwellings has been submitted. These estimates should be used to update the above figures.

Recommendation

- 5.1.138 I recommend that the SDDP be modified in accordance with the above estimates, subject to my comments in paragraphs 5.1.136 and 5.1.137.