

5.2 THE DISTRIBUTION OF LAND FOR HOUSING

Objections

As set out previously in this Report and in the Annex and Appendices, including those of Objectors represented at the Round Table Session (RTS) on this subject.

Main Issue

Whether the Local Plan's Housing Distribution Strategy accords with Structure Plan and Regional and national planning policies and is in all other respects a satisfactory basis for meeting the District's housing requirements.

Inspector's Reasoning and Conclusions

Introduction

5.2.1 I held a Round Table Session (RTS) on this subject on 16th September 2003. The notes on this session are at Appendix H. I continued it on 30th March 2004. In arriving at my Conclusions and Recommendations, I have taken account of the matters discussed at the Session, the Position Statements prepared for it by the participants and other written representations that Objectors and the Council have made. As with the Housing Supply RTS, I have borne in mind national and regional planning policies, including the policy on housing distribution set out in Planning Policy Guidance (PPG) 3 paragraphs 29 – 34 and the guidance in Structure Plan paragraphs 231 and 232 (Document CD5/3). Indeed, the **Hampshire County Council** confirms that it has no objection to the District Council's distribution strategy and that it accords with Structure Plan policies.

5.2.2 The site selection process is set out in the SDDP at paragraph 5.11. Some Objectors criticise the weight given to certain criteria in the selection process, but I am satisfied that the Council has for the most part followed the sequential approach set out in PPG 3 paragraphs 30-32. Another criticism of the distribution strategy is of the alleged inadequate amount of land identified for residential development and hence of the number of dwellings. That I deal with in Chapter 5.1 of my Report. Other criticisms relate to the alleged too great a number of settlements with Settlement Policy Boundaries (SPB) and the Council's method of assessing the merits of one site compared with another in the same, or another, settlement. Here, however, I examine those objections made to the generality of the distribution strategy.

The Council's Distribution Strategy

5.2.3 The distribution strategy is outlined in 3 main documents. They are "General Strategy" (Document CD13/2), "Housing Distribution" (Document CD16/4) and the Position Statement (Document RTS2/8/EHDC – 23/06/03). A hierarchy of settlements, based on an accessibility/facilities matrix, is identified (Document CD13/2 Appendices 1 and 3). The Council identifies 5 Group 1 settlements, Alton, Petersfield, Whitehill/Bordon, Liphook and Horndean as the most sustainable and accessible. They are also the largest in terms of population. They provide access, generally within convenient walking

distance, to the “matrix facilities” where they occur, including such major attractions as secondary schools, railway stations and large food stores. Group 2 follows with 27 settlements and where access to a more limited range of facilities is possible without the use of a car. Finally, comes Group 3 with 17 settlements where access to a yet more limited range necessitates a journey either by often poor public transport or by car.

- 5.2.4 The housing allocation is distributed to 23 sites to meet the baseline and reserve provision. Eleven allocations are proposed in the 5 settlements of Group 1 (1310 dwellings or 62% of the allocated total). Six allocations are proposed at 3 larger villages, Liss/Liss Forest, Four Marks/southern parts of Medstead and Clanfield (635 dwellings or 30% of the total). This provides for 92% in the 8 largest settlements. Three allocations are proposed in Group 2 settlements at Holybourne, Rowlands Castle and Bentley (85 dwellings or 4% of the total). Thus, 96% of the total allocation is proposed in 11 (Group 1 and 2) settlements.

Accessibility to Land Use Matrix

- 5.2.5 The Council’s Accessibility to Land Use Matrix assesses accessibility to a range of amenities, namely: employment, shop(s), primary schools, meeting halls, recreation space, public house and major facilities. Settlements with a score of 1 (the best) for each of the 7 facility categories are rated as the most accessible settlements. The scoring is based on a walking distance of up to 800 m to the range of facilities. A total score of 7 places a settlement in Group 1. A score of 2 indicates an easy cycle journey of 3 km to them. A score of 3 (medium) denotes a longer bus/rail trip (15-30 minute one way trip) or a car journey of up to 10 minutes for a one way trip. The Council regards the last category as difficult/unsustainable, with a score of 4, with more than 30 minutes for a one way trip or a car journey of more than 10 minutes for a one way trip.
- 5.2.6 The matrix is criticised on several counts. It is said to be too simplistic, to include unimportant facilities and to omit others that are more important, such as access to a secondary school or a railway station. It is criticised because it gives the same score to settlements with a lower level of facilities than Alton and Petersfield as it does to those towns; because it elevates satellite settlements to a higher level than they deserve; and it pays too little regard to landscape constraints such as the Area of Outstanding Natural Beauty (AONB). Some Objectors support particular settlements/sites to which their objections relate by devising their own, sometimes quite sophisticated, matrices.
- 5.2.7 I accept that the matrix could be refined and made more comprehensive. Indeed, the Council agrees. But it does provide a sufficiently clear indication of the most accessible settlements as a starting point for the distribution process. The choice and weighting attributed to particular land uses is criticised, but as the Council is at pains to emphasise, accessibility is but one of 5 factors to be considered in the search for suitable housing sites. It is an important one, but it should not be over-emphasised. I agree, and that accords with national policy in PPG 3, paragraph 31.
- 5.2.8 Similarly, the Council admits that its members asked officers to reconsider the original ranking of baseline and reserve sites to bring forward those that would provide community benefits. I comment on particular examples of this approach later. Suffice it to say that it is a legitimate part of the democratic process for members to seek to incorporate their political wishes. That is wholly acceptable provided that selection can be justified on planning merit.

5.2.9 The matrix elevates some satellites to a higher level than their size and facilities deserve, but some are effectively part of the main settlement and close enough to share its facilities. A good example is Holybourne which in many respects is an extension of Alton. Owing to distance, the relationship between Liss Forest and Liss is less clear. Bearing in mind the limitations of the accessibility matrix and the weight that needs to be attributed to other criteria, I see no serious objection to its form and use as a first step in guiding residential development towards particular settlements.

The Settlement Policy Boundaries

5.2.10 To guide the distribution of development, the Structure Plan requires a distinction to be made in local plans between countryside and main built-up areas (Document CD5/3, paragraph 295 and Policy C1). The Council does so by defining the SPBs around the main parts of its towns and villages. The methodology is set out in Document CD13/2 Appendix 2. As a result, 48 settlements have SPBs, shown on Insets to the Proposals Map that forms part of the SDDP. This compares with the adopted Local Plan that defines SPBs around only 16 settlements. Policy GS2a of the SDDP identifies those settlements where, in principle, development may take place within the SPB.

5.2.11 In support of its strategy, the Council draws on national guidance (Tapping the Potential – December 2000). This suggests (Section 2, 3rd paragraph) that, in carrying out an urban housing capacity study, previously-developed land within a village could provide the opportunity for essential new homes which could help to sustain local shops and other services like public transport. The Council's strategy to some extent is to spread the allocations around the District rather than to concentrate all development in the larger and more accessible settlements. One objective is to ensure that these settlements are not disproportionately burdened by demands made upon them to absorb new development.

5.2.12 The largest settlements in the District are of modest size. Alton, Petersfield, Whitehill/Bordon and Horndean have, respectively, populations of some 16,600, 14,300, 14,300 and 13,000. Accordingly, I see some merit in this measured approach to distribution. Paragraphs 31 and 32 of PPG 3 do not attribute weighting to the criteria in the site assessment process. In principle, therefore, it is valid for the Council to pursue dispersal of housing in the way proposed, with the building of communities as an objective of its distribution strategy. To this end the Council has made a small number of housing allocations at Group 2 or 3 villages.

5.2.13 The number of additional settlements for which SPBs are defined is criticised as exaggerating the amount of land that could come forward in unsustainable rural areas. The historic cores of many villages, however, are Conservation Areas and this should limit the amount of suitable development. Whilst PPG 3 encourages the efficient use of land, its paragraph 56 requires local planning authorities to have regard to surroundings, design and layout. Generally, SPBs hug the main built-up areas and this serves to limit expansion. In conclusion, I think that the large number of SPB settlements would not result in undue dispersal, although a few SPBs are too generously defined. This is the basis of my recommendations concerning Bucks Horn Oak, Greatham and High Cross.

5.2.14 I have my doubts about some of the benefits being sought in certain settlements, in that they appear to be disproportionate, and hence unreasonable in Circular 1/97 terms, when related to the scale and type of development envisaged. I have in mind the provision of a foot and cycle path at Liss Forest and affordable housing at Binsted. With the latter, it is

difficult to avoid the conclusion that the proposed allocation is to secure affordable housing by the means of cross-subsidy, which PPG 3 Annex B, paragraph 2 discourages. I do, however, recommend against the allocation of land for housing in both settlements.

Previously-developed Land

5.2.15 The CPRE argues that there is no need for the Council to allocate greenfield sites for development because there is more than enough previously-developed land in East Hampshire and beyond to meet the Structure Plan's housing requirement. This is based mainly on the premise that large tracts of **Defence Estates** land at Bordon will be released during the plan period. In addition, surplus employment land, poor quality housing areas/estates and decking over car parks are said to provide housing gains obviating the need to encroach onto greenfield sites. I explored this view in more detail in Chapter 5.1, concluding in essence that no definite reliance should be placed upon any one of these sources.

5.2.16 I discuss **Defence Estates** land in Chapter 5.1 of my Report in terms of housing supply. But the amount of land that could be released has important implications for the distribution strategy. The precise timing of any release of this land remains speculative, although the Louisberg Barracks or an equivalent area of some 37 ha could soon be officially declared surplus. The decision will follow the Defence Training Review (DTR) and will be reflected in the Whitehill/Bordon Masterplan. Land release(s) and its development are expected to comply with the Masterplan, due to be adopted by the Council in late 2005. On present information, therefore, surplus **Defence Estates** land could be made available for development before the end of the plan period. But, to repeat, I do not rely upon it.

5.2.17 About 20 ha of the Louisberg Barracks appears to be previously-developed land, although no doubt other parts of this complex would also be assessed for their suitability for development. Recommended densities in PPG 3 raise the prospect of at least 700 dwellings. This is a compelling factor in both the supply and distribution of housing land in the District, and the Local Plan should acknowledge it. No doubt the County Council will take it into account in its monitoring of the Structure Plan, the rate of house completions and the implications for the reserve sites in East Hampshire and elsewhere. On the face of it, any previously-developed land, located as it is within or adjoining one of the largest settlements in the District with a commensurate range of services, has a better claim for contributing towards the Council's housing requirements than greenfield land on the edge of the various settlements.

5.2.18 As a result of its Urban Housing Capacity Study (CD16/2) the Council considers that only 435 of its estimated residual baseline requirement of 640 dwellings, that is some 68%, could be accommodated on previously-developed land (Document RTS2/8/EHDC paragraph 3.4). In the main, the sites chosen are in the towns and larger villages at Alton, Liphook, Liss, Whitehill/Bordon and Four Marks or in settlements close to the towns (e.g. Holybourne). Another significant previously-developed site is the former St George's Hospital at Liphook. I deal below with this land in connection with its status as a proposed employment allocation and as a housing omission site.

5.2.19 In my view, the Council has done the best that it reasonably can in seeking to make good use of previously-developed land before it turns to greenfield sites fully to meet its housing requirement. Nevertheless, I do have reservations about this land where it

performs poorly in relation to the criteria set out in PPG3, paragraph 31. Land at Farringdon Mill is an obvious example.

Whether sufficient emphasis has been put on settlements with good public transport

- 5.2.20 “Good public transport” needs to be defined. The Council considers that an hourly bus or train service qualifies and, in the context of East Hampshire and especially its more rural parts, that is fair comment. Owing to the Government’s policies to encourage the use of public transport and to persuade people to leave their cars at home, I believe that a better test than this relative approach is to judge the extent to which a public transport service is likely to wean people from their cars. I doubt whether an hourly service, whilst no doubt important to those who use it, goes very far towards achieving that objective. A missed, late or cancelled bus or train, and the wait of nearly an hour for the next one, perhaps in inclement weather, does not encourage the use of public transport. It is more likely to convince people that private transport is generally more convenient, reliable and comfortable.
- 5.2.21 There are other considerations. Hourly bus services seldom extend late into the evenings and are usually even more limited during the weekend. Some services rely to a varying extent on County Council subsidies which are reviewed annually. Constraints on public finances and, from observation, the often limited use of buses on some routes, does raise doubts in my mind about whether some existing services can be guaranteed indefinitely. It is significant that, according to the 2001 Census, only 2% of employed people living in East Hampshire aged 16-74 travel to work by bus or coach. That compares with 7% for England and Wales. The fact that an hourly or so bus service exists at present at a given settlement does not, in my judgement, add a great deal to its accessibility.
- 5.2.22 The Council’s accessibility matrix makes no distinction between settlements that have a main line railway station and those that do not. This was criticised by some Objectors. Coincidentally, or perhaps because they have grown up around railway stations, 3 of the Group 1 settlements have main line stations (Alton, Petersfield and Liphook). Two Group 2 settlements (Liss and Rowlands Castle) have main line stations. Again, I am not convinced that the accessibility of a settlement is greatly enhanced by the presence of a railway station. Journeys to work are only one reason for boarding a train, but even in Petersfield, Liphook and Liss with their location on the London Waterloo to Portsmouth line, only 7%, 8% and 9% of employees respectively travel to work by train (2001 Census). It is a consideration, but one that should not be exaggerated.
- 5.2.23 I accept that, when looking at suitable locations for housing, accessibility is but one aspect in the search sequence. According to the Council’s definition of “good transport” the proposed strategy provides for some 92% of baseline and 72% of the reserve housing in settlements that enjoy this benefit. My reservations about the present and possible future importance of buses and trains, however, lead me to the view that the most important aspect of accessibility is convenient walking distance, up to about 2 km according to PPG 13, to a good range of services and facilities, including at least general day-to-day needs and to work. There is some scope for more cycling, another healthy mode of transport encouraged in national and regional policy. The towns probably provide most opportunities for cycling, but I am not convinced that the often busy rural roads in East Hampshire are well suited for it.

5.2.24 Modes of transport and accessibility should be examined in the context of the heavy reliance on private transport for journeys to work. In East Hampshire, 64% of employees go to work by car or van. The percentage is a little less in Whitehill/Bordon, Petersfield and Alton, being 60%. In Liss and Liphook it is 62% and 63% respectively. For England and Wales it is 55% (2001 Census). It would be a noteworthy achievement to reduce local percentages to the national average. Accessibility is not the only aspect of sustainability, but solely on this count the emphasis should be to locate residential development in the main settlements where the opportunities to walk and cycle to services and to promote public transport is greatest. In general, the major part of the allocations do so, but I deal with the point in more detail in my assessment of the proposed allocations, omission sites and the settlements concerned.

Relevance of National Travel Survey

5.2.25 The National Travel Survey (2002) reveals that employment (29%), shopping and personal business (22%) and education (9%) are the 3 activities that generate the most trips for the average Briton. It is argued that this information should have played a greater role in determining the location of housing development within the plan. For the reasons already given, distribution of housing should not be unduly weighted in favour of accessibility. Moreover employment, assuming it is the largest generator of travel, gives rise to complex journey to work patterns in the South-East Region due to the pull of the metropolis and the large towns that service it. Convenient accessibility to a particular employment area might be less important than proximity to a conurbation with a wide range of employment opportunities that can more readily match the varying skills of the resident workforce.

Housing Allocations on Greenfield Sites in the AONB/Proposed South Downs National Park (SDNP)/Environmental/Social and Other Constraints

5.2.26 The Council estimates that about 79% of the housing on proposed baseline and 76% of it on the reserve sites would be outside the AONB (paragraph 4.5, Notes of Housing Distribution RTS). Some Objectors say that location in an AONB should preclude development. I agree that designation is an important consideration in the search sequence required by PPG 3 paragraph 31. It is for me in my recommended ranking of the Reserve Sites. I consider that designation, and the outstanding quality of the natural beauty, is so important that sites within the Area should be ranked towards the end of the list with the implication that it would be better for them not to be developed at all. Inevitably, however, a balance must be struck between the need to identify additional housing land to meet the strategic housing requirement and the objectives of designation. That is especially so, as in East Hampshire, where there is a dearth of well-located previously-developed land. My views on whether a proposal should be regarded as major incursion into the AONB are set out in Chapter 3 of my Report.

5.2.27 The CPRE argues that, since an allocation of a site in the SDDP is the equivalent of the grant of outline planning permission, those in the AONB should be accompanied by an Environmental Impact Assessment as part of the local plan process. I disagree. Consideration of the need for an Assessment would be required at the planning application stage for the type of development described in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 1999. It would be for the Council as local planning authority to decide whether an Assessment was required. The prospective developer could also request a screening opinion from the Council.

Moreover, the development of Reserve Sites will depend on the results of County-wide monitoring of completions and on Regional Planning Guidance, as SDDP paragraph SD5.044 explains. This could lead to development taking place in another part of the County and render an Assessment abortive. I deal with the landscape considerations concerning Baseline, Reserve and Omission Sites in Chapters 5.3, 5.4 and 5.6 of my Report.

5.2.28 The Council confirms that it has consulted the relevant authorities and statutory undertakers on the capacity of public transport services, water supply, sewerage and education to meet the needs arising from the proposed housing allocations. I accept that no insurmountable obstacles are found. Where flooding has been identified as an issue (Document CD16/4 Appendix 1) I have taken account of the **Environment Agency's** views and data.

Comparative Site Sustainability Matrix

5.2.29 This Matrix identifies issues pertaining to sites within particular settlements whereby their suitability for residential development can be compared and assessed. It is applied to 131 sites comprising all Baseline and Reserve Sites and most of the Omission Sites. The analysis is based upon a simple system of ticks and crosses and, where there is significant uncertainty and a need for more investigation, question marks. There are 23 general criteria grouped into the 5 themes of transport, energy and pollution, countryside and heritage, health and community, economy and housing. A commentary box includes any salient details. Objectors criticise the matrix for a number of reasons. The main ones are that the approach is too simplistic and thus of limited use, that it does not include all the site selection criteria listed in PPG 3 paragraph 31, that the large number of question marks indicates a substantial and unacceptable level of uncertainty and that there is a lack of clarity in, and inconsistencies between, the scores achieved by particular sites.

5.2.30 I agree that the matrix does not attempt to apply any weighting to particular criteria. Nor does it reflect all the above PPG 3 criteria. Some criteria that might be crucial in certain cases, like location within the AONB or liability to flooding, appear only in the commentary box. As the matrix applies to settlements in isolation, it can give little assistance in the comparison of sites in different settlements. It is purely objective, and so cannot assist in the subjective judgements that have to be made on the importance of the advantages and disadvantages that may apply in a comparative analysis. Nevertheless, the Council has prepared a simple and straightforward method to highlight the main issues likely to arise, and a basis upon which to proceed for a more detailed assessment of competing sites. In that confined respect, the matrix succeeds.

5.2.31 It is no surprise that Objectors challenge the scores that certain sites achieve, and in some cases the Council accepts suggested changes. But the matrix is a useful start in a comparative analysis of allocations and omission sites, and I look in more detail at relevant matters in each settlement in recommending on the amount of development that it should accommodate and, where need be, the land that should be identified for it. I make judgements on the weighting that should be attached to various criteria in the particular circumstances of each settlement. For example, I consider that more importance should be attached to ease of access by foot to a good range of services and facilities and that a good bus service implies a more than hourly frequency. For Four Marks and the southern parts of Medstead, I compare not only the distances from certain sites to particular amenities but the actual and perceived hazards encountered on those

journeys. This more detailed assessment, including the greater weight that I attach to the AONB than does the Council, assists me in my recommendations concerning the ranking of the reserve sites in the settlements concerned.

5.2.32 The matrix is a useful foundation upon which to build. Despite its shortcomings that the Council does not deny, I have used it in this way and found it helpful.

The Ranking of Reserve Sites

5.2.33 In its ranking of the proposed Reserve Sites, the Council follows one of the suggested approaches set out in the supplement to PPG 3, “Planning to Deliver - The Managed Release of Sites: Towards Better Practice” (Document CD3/1). The rationale is at the Council’s Position Statement of 23/6/03 at paragraph 6.7 and in Document CD16/4 paragraphs 5.3-5.5. It includes the promotion of development to help address particular community needs, the provision of large urban extensions, including affordable housing, and giving time for a settlement to absorb development.

5.2.34 Government advice acknowledges the weaknesses of this approach (Document CD3/1 pages 8/9) and it could not anticipate the 2 stage approach to housing provision in Hampshire. The Structure Plan does not require Reserve Sites to be ranked (Notes of Housing Distribution RTS paragraph 6.4), but I see no objection to doing so. Indeed, it has considerable merit in holding back land in the AONB for as long as possible in the hope that more suitable and previously-developed land will come forward and make development in this designated Area unnecessary.

Rural housing

5.2.35 Many Objectors refer to national policy in PPG 3 paragraphs 69, 70 and 71 concerning rural housing. This states that the Government is concerned that there should be adequate housing provision in rural areas to meet the needs of local people. Local planning authorities are urged to make sufficient land available either within or adjoining existing villages to enable these local requirements to be met. I have taken this into account in my adjudication on the objections concerned, noting that it is a consideration that could be applied to a host of small settlements in a predominantly rural District. It must, however, be weighed in the balance with other considerations including the search sequence advocated in paragraph 30, the criteria in paragraph 31 and the need to link development with public transport and, I would say, good public transport. As always, this national policy must be applied to local circumstances.

5.2.36 Inevitably, any significant additional amount of residential development would lend some support to those local amenities that exist. From the evidence, however, I remain unconvinced that there are any cases in East Hampshire where a local service like a school or a shop would become unviable without the development that is claimed would be useful to assist its future. I think it more likely that as, for example, people appear to tend to rely more and more upon supermarkets for more and more purchases, small local shops will increasingly continue to come under threat irrespective of any modest residential development nearby. Similar considerations apply with proposals for affordable housing. Any such scheme would no doubt help to secure a mixed and balanced community, but arguably people on lower incomes who need this type of accommodation are those who rely more upon local facilities and/or good public transport to avail themselves of services and facilities elsewhere.

5.2.37 My fear is that the future of some local amenities, including some rural bus services, operated under contract to the County Council and which are neither frequent nor appear to be particularly well patronised, cannot be guaranteed. Their closure or withdrawal could result in more people relying more on private transport, contrary to the Government's intention, and/or being obliged to live in a settlement with few facilities and with increasingly limited opportunities to travel to the towns and cities. As I suggest, it is doubtful whether a modest residential scheme in those circumstances would be a crucial addition. Generally, therefore, in the local circumstances that apply in East Hampshire, I place more weight upon the 3 stages of the search sequence. These are the re-use of previously-developed land and buildings within urban areas, urban extensions and finally new development around nodes in good public transport corridors.

Conclusions

5.2.38 I see no objection to the generality of the Council's approach to the distribution of housing land throughout the District. I comment below on the settlements selected by the Council, those promoted by objectors as well as the proposals for baseline, reserve and omission sites within them. My recommendations are more in the form of fine-tuning of the Council's strategy than of implying substantial modifications to the SDDP.

5.2.39 Throughout my assessment of sites and settlements, and their suitability for the allocation of land for housing, I adopt a comparative approach, seeking to compare the advantages and disadvantages of both. Criteria include accessibility in all its aspects, the range of services and facilities available, the incidence of previously-developed land and the way in which it performs against the criteria listed in PPG 3, paragraph 31, capacity of infrastructure, the ability to build communities and physical and environmental constraints like flood risk, the character of the countryside and the AONB.

5.2.40 My recommendations on the suitability or otherwise of allocated and omission sites are, therefore, based upon judgements on the comparative weight to be attached in each case to these criteria. I do not look at these criteria individually, but in the relevant and different combinations that apply to particular sites. It is a complex exercise, but I believe that my recommendations are based upon judgements on relevant facts and upon my having accorded due weight to national and regional policies in the local context.

Recommendation

5.2.41 I recommend that, subject to my more detailed recommendations elsewhere in my Report, no modification be made to the SDDP.