

Yateley, Darby Green and Frogmore Neighbourhood Development Plan

Examiner's Clarification Note: Questions for the District Council

HDC = Hart District Council

YDGFNP = Yateley, Darby Green and Frogmore Neighbourhood Development Plan

The representation from Obsidian Strategic comments about the details in paragraph 113 of the Plan and recent planning history relating to an additional SANG. I suggest that the reference should be to paragraph 112. I would appreciate any comments which the District Council may wish to make on this matter.

Hart District Council Response

1. HDC agree that the objection relates to para 112 of the Plan.
2. The representation requests reference within the plan to a new SANG on land adjacent Eversley Road between Yateley and Eversley Cross, on the basis that the land will provide open space and prohibit coalescence between Yateley and Eversley Cross.
3. The SANG referred to by the objector was granted permission on appeal on 15 October 2021¹ but to our knowledge has not yet been implemented.
4. HDC disagrees with the objector and does not consider that the plan needs be changed in response to this representation.
5. Para 112 simply lists the current SANGS *within the neighbourhood plan area*, in recognition that substantial parts of the parish lie within the TBHSPA and the 400m and 400m-5km buffer.
6. The land in question lies *outside* the Neighbourhood Plan area, *within Eversley Parish*, east of Yateley (parish boundaries shown on the plan below). It is not considered necessary to list SANGs or other open spaces outside the plan area.

¹ Planning application 20/02308/FUL, [Appeal Ref: APP/N1730/W/21/3273529 Land South of Eversley Road and East of Marsh Lane, Eversley Cross, Hook, RG27 0NQ](#)



7. The other argument made by the objector is that it would prohibit coalescence with Eversley Cross. HDC is not persuaded that this is a reason to amend to plan. In any event, at this part of Yateley there is built development right up to the Yateley Parish boundary. There is no scope for development within Yateley Parish (the plan area) that would threaten coalescence with Eversley Cross. No sites are allocated in the local plan or any neighbourhood plan that would threaten coalescence.
8. For coalescence with Eversley Cross to become an issue it would rely on development taking place within Eversley Parish, which is beyond the remit of the YDGFNP.
9. To conclude, it is not considered necessary to make the proposed change which relates to land outside the neighbourhood plan area.

The representation from Belgrave Homes/Woolf Bond Planning (016) comments about the supply of housing land in Hart District. I would appreciate any comments which the District Council may wish to make on this matter in general and specific information on its most up-to-date assessment of the issue.

Hart District Council Response

10. The objector argues that the neighbourhood plan should allocate housing sites because the local plan does not address the area's housing need in full. They say that whilst the shortfall will be addressed through a future local plan review, it is appropriate for the neighbourhood plan to include housing allocations, especially as the Local Plan includes an allowance for delivery of further sites through Neighbourhood Plans.
11. They also argue that although HDC contends that it can demonstrate over a 10-year supply of housing, this unjustifiably includes a reduction in the annual requirement to take account of the over-delivery during the early years of the Plan period. Given a reduced supply is predicted in later years, they argue that sites should be allocated in the YDGFNP to help prevent a five-year land supply problem in future years.

12. HDC disagrees with the arguments put forward and does not consider it necessary or appropriate for any sites to be allocated in the YDGFNP.
13. The [Hart Local Plan \(Strategy and Sites\) 2032](#) (HLP32) was found sound and adopted in April 2020. It does not allocate any housing numbers to Yateley Parish. It is open to the YDGFNP to allocate sites for development if they choose to do so, *but they do not have to do so*.
14. When the local plan was adopted, there was a shortfall in housing supply of 230 homes, arising in the final year of the plan 2031/32. This was a result of an increase in Hart's overall housing requirement of 41 homes per year to accommodate an unmet housing need from Surrey Heath under the duty to cooperate.
15. HDC's latest position is that this shortfall no longer exists², but in any event the local plan was found sound despite this shortfall. See Annex 1 attached for the Inspector's reasoning.
16. Neither the Inspector's Report³ nor the local plan sets any expectation or obligation that the shortfall must be addressed through neighbourhood plans.
17. It would be totally inappropriate to impose an unwanted site allocation on a neighbourhood plan in order to address a district-wide shortfall in 2031/32 that the Inspector acknowledged will be addressed through a review of the local plan (or additional windfall development) and which in HDC's view, in light of more recent work, will not materialise anyway.
18. The objector also refers to an "allowance for delivery of further sites through Neighbourhood Plans". This reference is unclear. HLP32 Policy SS1 Spatial Strategy and Distribution of Growth criterion (d) supports the delivery of new homes through Neighbourhood Plans, but it does not compel neighbourhood plans to allocate sites. Nor does the local plan contain any housing numbers to be delivered from neighbourhood plans (with the exception of Odiham and North Warnborough which had already been made and included sites allocated for housing development).
19. Finally, the objector suggests that Hart's five-year housing land supply methodology is inconsistent with national policy and that sites should be allocated in YDGFNP in order to maintain a five-year supply going forward given the declining supply predicted in the later years of the plan.
20. HDC's position is that its approach to five-year land supply⁴ is robust and that the objector's concerns over future land supply are speculative and irrelevant.

² See housing trajectory at Appendix 9 of the [Housing Land Supply Position Statement at 1st April 2021](#)

³ [Hart Local Plan Report - Final.pdf](#)

⁴ [Five Year Housing Land Supply Position Statement at April 2021](#)

21. HDC is confident that it will continue to have a five-year supply going forward, but should HDC ever fail to demonstrate a five-year land supply, the NPPF deals with that by triggering the presumption in favour sustainable development. It does not deal with it by imposing unwanted sites on neighbourhood plans before such circumstances have even arisen.
22. Hart's five-year supply is not the document that is being examined, it is the YDGFNP. Nevertheless, if the examiner seeks more detail on this issue HDC will readily oblige.
23. To conclude, it would be inappropriate to make any changes as requested by the objector as the YDGFNP does not need to make any site allocations.

Hart District Council

7 February 2022

Annex 1 – Extract from Hart Local Plan Inspector’s Report

Whether the Plan will meet the identified housing need?

91. Based on the revised trajectory set out in MM139, I calculate that a housing requirement of 423 dpa over the Plan period (7,614 dwellings in total) results in a shortfall of supply of 230 dwellings. I also calculate that this shortfall would occur in the last year of the Plan period (2031/32). The Council agrees with this assessment.

92. The NPPF 2012 at Paragraph 47 sets out that to boost significantly the supply of housing, local planning authorities should (amongst other things) be able to demonstrate a five year housing land supply and identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 (to meet identified needs).

93. The Plan would provide for specific, developable sites for 11 years following the adoption of the Plan. I consider that this would meet the requirements of Paragraph 47 of the NPPF and the shortfall of 230 dwellings during the last year of the Plan period does not result in the Plan being unsound, particularly as the Plan would need to be reviewed in 5 years’ time in any event. A modification (MM22) is required to set this position out within the Plan.

94. There is clear evidence that over recent years, very few sites in Hart see their planning permissions lapse, particularly for sites over 10 dwellings. I am also mindful that in the short term there is forecast to be a very healthy level of supply over and above the housing requirement in the first five years of the Plan following adoption. This means that a review of the Plan in 5 years’ time would ensure that any under or non-delivery from sites in the longer term can be suitably addressed if necessary at that time. It is also feasible that additional windfall development could come forward over the Plan period that would meet the relatively modest shortfall.