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# EXAMINATION STATEMENT – MATTER 1

## Hart Local Plan: Strategy and Sites 2016-2032

Representations on behalf of  
Gallagher Estates and Barratt Homes

October 2018

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**HART LOCAL PLAN:  
STRATEGY AND SITES 2016-2032**

**REPRESENTATIONS ON BEHALF OF  
GALLAGHER ESTATES AND BARRATT HOMES**

**OCTOBER 2018**

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## 1.0 INTRODUCTION

- 1.1 This Statement has been prepared by Barton Willmore LLP on behalf of Gallagher Estates and Barratt Homes, who have land interests at Winchfield which forms part of the “area of search” for a new settlement under emerging Policy SS3.
- 1.2 Representations have been made on behalf of our Clients throughout the production of the emerging Local Plan. As the “area of search” also covers land at Murrell Green, promoted by Lightwood Land, this Statement has been prepared in consultation with Lightwood Land as part of the on-going collaborative approach to the new settlement.
- 1.3 Notwithstanding the land interests of our Clients, these representations have been prepared in recognition of prevailing planning policy and guidance, in particular the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 1.4 From the outset it is important to note that the Local Plan has been submitted during the transitional arrangements set out in the 2018 NPPF and is being examined under the 2012 NPPF. This Statement considers the Inspector’s questions in this context, with references to the NPPF referring to the 2012 document unless otherwise stated.
- 1.5 These representations respond to the Inspector’s questions within Matter 1 and have been considered in the context of the tests of ‘Soundness’ as set out at Para 182 of the NPPF which requires that a Plan is:
- **Positively Prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where reasonable;
  - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternative, based on proportionate evidence;
  - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
  - **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

## 2.0 RESPONSE TO QUESTIONS

### **QUESTION 1.3 – Is the Sustainability Appraisal (SA) adequate? Has the Plan's formulation been based on a sound process of SA and testing of reasonable alternatives?**

- 2.1 Yes, the SA is adequate and the Local Plan has been based on a sound process of SA and testing reasonable alternatives.
- 2.2 The NPPF (Para 165) and PPG (Section 11) are clear that the SA is an integral part of the Plan making process which should be commenced at the same time that work starts on developing the Plan.
- 2.3 In full accordance with Government guidance on the SA process, Hart District Council (HDC) has undertaken an iterative process and the SA has evolved throughout with the following documents published:
- SA Scoping Report April 2014 (examination document OTH10);
  - SA of Housing Development Options August 2014 (OTH9);
  - Interim SA April 2017 (OTH11);
  - SA February 2018 (CD5a);
  - SA Post-Submission Interim Report August 2018 (CD5c).
- 2.4 The above have been published alongside relevant Local Plan consultations, being available for public consultation. As HDC received feedback and the Local Plan developed, the SA was amended accordingly as needed.
- 2.5 The SA process commenced alongside the Local Plan process and has been an integral part of the Plan making process.
- 2.6 The PPG is clear that the SA should only focus on what is needed to assess the environmental, economic and social impacts that are likely to be significant, and its content should be appropriate for the content and level of detail in the Local Plan (PPG 11-009-20140306).
- 2.7 Throughout its development the SA has considered various options for growth, with a total of 7 No. options considered in the SA February 2018. These were updated in the addendum, with 8 No. options. The addendum also considered the likely effects when including the new settlement for various options.

- 2.8 These constitute reasonable alternatives, with a range of options presented including non-strategic sites and urban extensions.
- 2.9 HDC considered these alternatives throughout the Local Plan process, with public consultation identifying that a new settlement was the preferred approach alongside the outcomes of the SA process.
- 2.10 The PPG states that reasonable alternatives are the different realistic options, reiterating they must be realistic and deliverable (11-018-20140306). The SA does only consider realistic and deliverable options, being sites promoted by landowners/developers.
- 2.11 The PPG sets out the process for considering reasonable alternatives and that the SA should include (11-018-20140306):
- The reasons the alternatives were selected;
  - The reasons rejected options were not taken forward;
  - Reasons for selecting the preferred approach in light of the alternatives;
  - Conclusions on the overall sustainability of each alternative.
- 2.12 The SA does include all of these factors and is considered to have met the requirements for considering reasonable alternatives.

**QUESTION 1.4 – Does the SA suitably consider reasonable alternatives to the delivery of a new settlement at Murrell Green/Winchfield in terms of potential growth options in the long-term?**

- 2.13 Yes, as identified above the SA and Post-Submission SA both consider a range of options for growth in the longer term and consider realistic alternatives in accordance with the NPPF and PPG.
- 2.14 The SA also considers multiple locations for the new settlement, being the identified area of search covering Murrell Green and Winchfield, and land at Rye Common.
- 2.15 As set out in the PPG, the SA should only consider realistic and deliverable alternatives. The SA (February 2018) and Post-Submission SA (August 2018) both set out that only land within the area of search and at Rye Common have actively been promoted for a new settlement since 2017. As such, these are the only areas that could be considered realistic and deliverable when producing the SA.

- 2.16 Appendix III of the SA February 2018 and Appendix I of the Post-Submission SA consider the two options against the SA criteria. Both reports indicate that the area of search performs relatively well compared to Rye Common.
- 2.17 The Post-Submission SA expanded upon the alternatives assessed at Rye Common, including a small option as being promoted and a larger scheme which could support a secondary school. This is reflective of the aspiration of HDC for a new secondary school to be provided within the Plan period, as set out in the Local Plan visions and objectives. It should be noted that the smaller option at Rye Common is the scheme being promoted, which cannot support a secondary school.
- 2.18 The expanded assessment in the Post-Submission SA serves to provide additional comparisons for HDC to consider. These have not altered HDC's conclusions regarding the preferred location for the new settlement and further ensure the SA does fully consider reasonable alternatives to the delivery of a new settlement at Murrell Green/Winchfield.