
EXAMINATION STATEMENT – MATTER 2

Hart Local Plan: Strategy and Sites 2016-2032

Representations on behalf of
Gallagher Estates and Barratt Homes

October 2018

EXAMINATION STATEMENT – MATTER 2

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

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

OCTOBER 2018

Project Ref:	20997/A5
Status	FINAL
Issue/Rev:	01
Date:	25 October 2018
Prepared by:	Emma Gladwin
Checked by:	Huw Edwards
Authorised by:	Huw Edwards

Barton Willmore
The Observatory
Southfleet Road
Ebbsfleet
Dartford
Kent
DA10 0DF

Tel: 01322 374660
Email: emma.gladwin@bartonwillmore.co.uk

Ref: 20997/A5/EG/kf/cg
Date: 25 October 2018

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

CONTENTS

	PAGE NO.
1.0 INTRODUCTION	01
2.0 RESPONSE TO QUESTIONS	02

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 2.1 – Is the vision justified and consistent with National policy?

- 2.1 Yes, the vision is justified and consistent with national policy.
- 2.2 At the heart of the NPPF is a presumption in favour of sustainable development (Para 14), which is reflected in the Local Plan vision in seeking to meet future housing, social and economic needs in a holistic and sustainable manner.
- 2.3 The vision does this through including more than just housing, seeking new jobs, infrastructure, affordable housing, developing Fleet, a secondary school and other aspects. All these aspects seek to ensure Hart develops in a positive, sustainable manner in accordance with the NPPF.
- 2.4 In including the secondary school, which has been a clear desire of the Council throughout the Local Plan process, and the new settlement, the vision is aspirational in accordance with Para 154 of the NPPF.
- 2.5 The Local Plan sets out a positive vision for the future of Hart, in full accordance with Para 17 of the NPPF.
- 2.6 A significant part of this positive, aspirational vision, is the delivery of a new settlement to meet longer term housing needs and provide infrastructure, including a new secondary school. The new settlement will ensure flexibility in the housing supply, to meet longer term needs both within Hart and the HMA (including unmet need) and to respond to any under delivery from sites with planning permission and Hartland Park.
- 2.7 The NPPF seeks to boost significantly the supply of housing (Para 47), with the 2018 NPPF stating that strategic policies should 'as a minimum' meet housing and other needs (Para 11). The NPPF is clear that it does not preclude Councils from planning for more than the minimum housing need, with a housing shortage across the UK as a whole.
- 2.8 Hart is seeking to provide more than the minimum housing need with the new settlement, taking a positive and longer term view in full accordance with the NPPF.

- 2.9 Furthermore, the Government has reiterated its support for Councils planning for more than the minimum housing need through the Garden Community prospectus (August 2018) which states at Para 9 that the Government:

'Particularly welcome proposals which release more land through local plans to meet local housing need, and/or go above local housing need.'

- 2.10 This reinforces that Councils should be proactive and that planning for more than the minimum housing need is to be encouraged. The Council is proceeding with a bid for Garden Community status for the new settlement.
- 2.11 The Local Plan vision is also positive in its holistic approach to a sustainable future for Hart. It seeks new homes, jobs and infrastructure, which will be provided in part by the new settlement. Including the area of search in the current Local Plan means that the necessary work can commence now at an early stage, with delivery able to commence in the middle of the Plan period when there is a significant decrease in the housing trajectory.
- 2.12 Work on the Development Plan Document, subsequent planning applications, discharge of Conditions, discussions with relevant stakeholders, and so on, can all commence now and take place in the forthcoming years due to the Council taking the proactive approach of including the area of search now. Only starting to look at the area of search at a later stage would delay commencement and there is a risk that it would not deliver when first needed, thus risking the delivery of the positive Local Plan vision.
- 2.13 The vision also seeks to provide a greater number of affordable homes, with this having consistently been identified as an issue in the Local Plan evidence base. Whilst the Local Plan may meet the market housing need in quantitative terms, overall housing need goes beyond this and needs to look at affordable housing, a mix of housing and specialist forms of housing. The vision and Local Plan as a whole do seek to achieve this.
- 2.14 However, there is a risk to achieving this without the new settlement as the only allocation in the Local Plan is at Hartland Park which is providing 20% affordable housing. Not all approved schemes will provide the desired 40% of affordable housing, as at Hartland Park. The new settlement will provide 40% affordable housing, potentially being 2,000 new affordable homes based on delivery of 5,000 homes overall. This will significantly contribute towards the provision of affordable housing in Hart, seeking to change the history of low levels of affordable delivery.

- 2.15 Overall the vision is aspirational and realistic, seeking to meeting more than just the minimum housing requirement and for new jobs and infrastructure to be provided alongside to create a sustainable District in the longer term.

QUESTION 2.2 – Are the strategic objectives justified and consistent with National policy?

- 2.16 Yes, the strategic objectives directly relate to the Local Plan vision which as set out above is consistent with national policy.
- 2.17 The objectives are all justified through the Local Plan evidence base and represent a positive vision for Hart. Similarly to the vision, the objectives seek to provide more than housing to create sustainable development.
- 2.18 The objectives seek to provide a mix of housing of different types, sizes and tenures to meet the needs of all residents across Hart, whilst providing affordable housing, which should be supported and encouraged. As set out above, the new settlement will provide a housing mix and 40% affordable housing to significantly contribute to meeting this objective.