



**Lambert
Smith
Hampton**

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**Submissions to the Hart District
Local Strategy and Sites
Submission Plan Examination in
Public.
Matter 2.**

Statement On behalf of

The Rural Hart Association

Prepared by
Lambert Smith Hampton
United Kingdom House
180 Oxford Street
London W1D 1NN

Tel: 020 7198 2000

Fax: 020 7198 2001

Date: October 2018

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1.0 INTRODUCTION –Who are RHA?

- 1.1 The Rural Hart Association (RHA) is an association of groups whose aim is to protect the rural assets of Hart and coordinate efforts to resist unnecessary building outside of settlement boundaries. For details of Membership see Part B of the Regulation 19 Response Form.
- 1.2 This supplementary note should be read in connection with the RHA's Regulation 19 submission.

2.0 CONTEXT OF REPRESENTATION

- 2.1 The RHA is concerned that Hart District Council are pursuing a policy in their emerging plan that will unnecessarily jeopardise open land in and around Murrell Green/Winchfield and commit to the creation of a new settlement in this area. RHA recognises the need for the Council to identify and maintain a supply of land for housing to meet the needs for growth in the District, and that the Council need to be robust in identifying that supply of land in order to prevent opportunist development across the district. RHA considers however that a strategy based on focusing development within existing urban areas in the district rather than focusing on a new settlement would be more sustainable and more effective in meeting housing need. Concentrating development in urban areas would also be more effective in regenerating Fleet as a town where the absence of investment and development has led to the town's stagnation and a decline. The Local Plan has identified Fleet as the most important centre in the district and has recognised the need for Fleet regeneration
- 2.2 Matter 2 of the Inspector's programme considers whether the vision for Hart is justified and consistent with national planning policy. The Regulation 19 submission of the RHA suggests that this is not the case. The Council are promoting new homes beyond the assessed need (Objective 1) and a new settlement at Winchfield which is expressly identified in the vision statement (Objective 3).
- 2.3 The Local Plan suggests that the new settlement is required to meet objectively assessed housing need using the recently adopted standard method for assessment and yet the Council concede that the new settlement is not required to meet housing need until beyond the end of the current plan period. Furthermore, looking closely at the Council's housing numbers, they have over-estimated the housing need to a very considerable extent and this over-estimation is compounded by recent and widely published population projection data that suggests that the standard model is based on higher levels of population growth than more recent population models would support.
- 2.4 In normal circumstances and within the advice of the NPPF as revised in 2018, Councils are encouraged to plan for housing beyond the objectively assessed target only where certain circumstances are identified including historic under-provision or poor delivery; taking on housing need generated by more constrained settlements beyond the borough or to meet an identified strategic development objective. None of these circumstances exist in Hart district and substantially increasing the housing requirement cannot be justified through Government policy or the proper application of the NPPF. For these reasons the RHA considers that the Vision statement for the Hart Local Plan is inconsistent with national policy.

- 2.5 In respect of planning for housing the NPPF is clear that housing should be planned over a minimum 15 year period from adoption of the plan (NPPF Para 67). The need should reflect an up to date SHLAA that is consistent with Government policy. Making forward projections of population, migration and thus housing need is a difficult technical craft and its accuracy will necessarily diminish the further into the future that the projection seeks to reach. For this reason there is a suggested limit on planning for housing beyond the 15 year plan period. Planning for housing that may or may not be needed beyond the plan period in an outline form may be a reasonable approach to plan-making to give a consistent vision going forward. However, and here is the heart of the matter, enacting plans for housing projections beyond the plan period in the middle of the current plan period sets in bricks and mortar a need for housing that may never be realised.
- 2.6 Whilst the Council have deleted some of the references to making an early start on provision of the new settlement from the plan in their amendments published in Enquiry Document 6, they still refer to the delivery of housing at this site “from the middle of the plan period”. In addition the Vision states that the provision of a new settlement “will have begun” in the Planning period. The approach set out in the vision and objectives seeks to begin development at a time when the homes it is intended to provide will not be necessary according to the assessed need. This may well divert housing provision from other designated sites in more sustainable brownfield locations. It also promotes the satisfaction of the current housing need in an unsustainable manner, taking unnecessary green field land into development when more sustainable, possibly harder to deliver, brownfield sites will remain undeveloped. This consequence of the Council’s vision and objectives runs directly contrary to the objectives, policy and advice set out in the NPPF.
- 2.7 The NPPF at paragraph 72 considers the provision for large numbers of new housing through the allocation of town extensions and new settlements. It is clear that new settlements should be planned to “meet identified needs” in a sustainable way. The need for the new settlement here is not established and the solution is not sustainable. The new settlement should be deleted from the vision and objectives for this plan.
- 2.8 In regard to the wider vision and objectives the Council state that their vision is to maintain the rural character of Hart District whilst Objective 14 seeks to maintain the character of the existing settlements. Clearly the creation of a new settlement, in the countryside, is in conflict with both these elements of the vision and Objective 14. Where competing objectives meet, one must have regard to the justification that sits behind them to weigh in the balance which one should prevail. In this case, the

Council acknowledges there is no “need” for the new settlement and in consequence Objective 14 should prevail.

