



Matter 3 – The Housing and objectively assessed
need for housing and the housing requirement
Claremont Planning for EPV N Hants
Representor No. 164

MATTER 3 EXAMINATION STATEMENT

**EUROPEAN PROPERTY VENTURES
(NORTH HANTS)**

REPRESENTOR 164

**THE HOUSING AND OBJECTIVELY ASSESSED
NEED FOR HOUSING AND THE HOUSING
REQUIREMENT**



This Statement for Matter 3 will seek to address the Inspector's Questions identified below:

1. Having regard to the transitional arrangements contained in the NPPF, 2018 is the use of the standard methodology for calculating housing need justified?
2. Does the use of the standard methodology fulfil the requirements of the first bullet point of Paragraph 47 of the NPPF, 2012?
3. Is uplifting the housing requirement by some 33% above that calculated by the standard methodology to 388 dwellings per annum justified? What evidence are the uplifts based upon?
4. Does or should the housing requirement formally include any unmet need from Surrey Heath?
5. If the use of the standard methodology for calculating housing need was considered to be inappropriate, is the objectively assessed need figure of 382 dwellings per annum set out within the Strategic Housing Market
6. Assessment (SHMA) robust?



Matter 3 – The Housing and objectively assessed need for the housing requirement

Introduction

7. Claremont Planning Consultancy Ltd previously provided responses to the Council's emerging Local Plan on behalf of European Property North Hampshire (EPV) to seek to boost housing requirements and recognise the need to ensure housing delivery within the district of Hart.
8. On behalf of European Property Ventures North Hampshire (EPV), Claremont Planning identifies that the emerging plan and its strategic approach to delivering development is unsound and fails to comply with the duty co-operate. The failure of the plan to distribute development in accordance with the advice of the National Planning Policy Framework and the documented evidence base means that the resulting plan is ineffective and fails to meet the test for legal compliance. Through these representations the failings of the proposed strategic approach will be identified, specifically in respect of the over-reliance upon approved windfall developments and large strategic growth proposals to deliver a consistent level of development delivery over the life of the plan period.
9. It is the view of Claremont Planning that the figures suggested in the HMA are unjustifiably modest and that reference to the requirement for a new settlement undermines the findings of this evidence document. Given that the Plan does not make specific spatial designations for the new settlement, rather it provides a "general area of search," for the new settlement at Murrell Green/Winchfield, the numbers that have been attributed to it should not be a robust or a significant component of the deliverable housing numbers. This, alongside the modest figures of the HMA, results in a poorly executed development strategy that is not underpinned by a robust evidence base or does it demonstrate a positively prepared Plan that is in compliance with National Policy. By selecting a lesser number of identified need, the Plan does not allow for appropriate flexibility for delivery and as such will not be able to meet its identified need if external factors beyond the Council's control detrimentally influence the build-out of the identified strategic sites selected within the District.
10. The Council need to provide a wide range of housing land allocations across the District to meet the required more realistic quantum of housing development. We therefore suggest that the SC5 site at Eversley Road is reinstated to assist in accommodating future housing needs. The SC5 site at Eversley Road was ideally located immediately adjacent to the settlement's western boundary. The Local Plan proposes a low number of homes to be delivered to 2032 however, they state that they accept future requirements will be higher and that a new settlement will be necessary and will be delivered within the plan period through a separate DPD. The Council are therefore acknowledging that more houses are required than they suggest but they have no definitive plans for any 'New Settlement' and yet allocations at sustainable locations, such as SC5 Eversley Road have been deleted without any solid justification. The potential for housing allocations in a highly sustainable location at Yateley that has the capacity to deliver 100 -120 dwellings should not be discounted so readily.
11. The removal of further allocations at Yateley seems to have been borne out of the LPA's desire to progress the Local Plan as quickly as possible and to avoid even moderate delays related to the allocation of SANG on land that had been promoted for such use by CEMEX and Gawthorpe Estates. The SC5 site at Yateley could have contributed to the delivery of such SANG and also



to the long-term growth strategy for Yateley in complete contradiction of its suitability for growth and the necessity of it to meet the unmet housing needs of the District.

12. On behalf of European Property Ventures North Hampshire (EPV), Claremont Planning identifies that the emerging plan and its strategic approach to delivering development is unsound and fails to comply with the duty co-operate. The failure of the plan to distribute development in accordance with the advice of the National Planning Policy Framework and the documented evidence base means that the resulting plan is ineffective and fails to meet the test for legal compliance. Through these representations the failings of the proposed strategic approach will be identified, specifically in respect of the over-reliance upon approved windfall developments and large strategic growth proposals to deliver a consistent level of development delivery over the life of the plan period. The previous draft allocation SC5 should be reinstated with the adjacent Eversley gap identified as search area for the provision of strategic SANG.
13. The SC5 site was previously a draft allocation in the regulation 18 consultation and was therefore previously considered suitable for development. A series of consultant reports were prepared supporting development at this location. The development would result in a logical expansion to the town to the west, the only area that can accommodate growth due to the restrictions caused by flooding and TBHSPA at all other locations. It is unjustified to remove this site from the draft allocations when the Local Plan is suggesting a restricted number of new homes across the plan period. The Local Plan proposes a low number of homes to be delivered to 2032 at existing settlements, although recognising that future requirements will be of a much higher level sufficient to justify a new settlement. The Council are therefore acknowledging that more houses are required than they suggest but they have no definitive plans for this New Settlement and yet they have deleted a highly sustainable draft allocation for 100-120 dwellings at Yateley.
14. Claremont Planning are of the mind that the Plan is not sound given that it has not been effectively or positively prepared given the delivery of a lesser housing number in comparison to the identified need over the Plan period. This does not ensure a robust delivery strategy and will quash the aspirations of growth within the District and result in greater development pressures on windfall, which in turn will be detrimental to the housing land supply of the Council. This will be further exacerbated following the Framework's new Housing Delivery Test which will demonstrate the poor delivery of the District and result in a detrimental impact on the ability of Hart District Council to manage development within its jurisdiction.
15. On behalf of EPV, Claremont Planning request that the policy is amended to allocate the identified SC5 site at Eversley Road as part of a strategic shift in the overall development management policies of the Plan to ensure that there are is a satisfactory number of deliverable sites within the District. Allocations of a lesser and more appropriate scale than the existing strategic sites and proposed new settlement will enable some comfort in delivery and avoid over-reliance upon untested development proposals. The sites such as SC5 at Eversley Road will act in a complementary capacity to those which are strategic in scale and will not otherwise prejudice the LPA's ability to meet the identified need of the Local Plan. Furthermore, the site at Eversley Road, Yateley will meet all criteria set out by Natural England, which clearly states that 2ha is a sufficient space for SANG to operate successfully. The SC5 site could deliver a highly sustainable form of development with onsite SANG or contribute to the provision of a wider strategic SANG within the Eversley Gap, so the SANG could therefore act as a buffer



preventing any perceived coalescence of settlements. As such, this demonstrates the suitability of the site and therefore will be developable within the Plan period.

16. It is suggested that the site at Eversley Road is reinstated as a housing land allocation which can come forward for development sooner than a proposed new settlement on land that is yet to be identified and acquired and therefore it seems unrealistic to assume the new settlement can be delivered in the next 5 years. The SANG proposed in the masterplan meets with the requirements of Natural England and our client is considering the possibility of providing additional SANG on an adjoining site or make use of the provision of new SANG elsewhere which will result in significantly improve the overall capacity of SANG within the District.
17. Claremont Planning have demonstrated that the plan cannot be found effective, sound or legally compliant without further modification given the inadequacies surrounding the identification of strategic growth locations.