

HART DISTRICT LOCAL PLAN: STRATEGY AND SITES (2016-2032)

HEARING STATEMENT

MATTER 3: HOUSING – THE OBJECTIVELY ASSESSED NEED FOR HOUSING AND THE HOUSING REQUIREMENT

ON BEHALF OF LIGHTWOOD LAND

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

Prepared by: Alexander James Bullock

Pegasus Group

First Floor | South Wing | Equinox North | Great Park Road | Almondsbury | Bristol | BS32 4QL

T 01454 625945 | **F** 01454 618074 | **W** www.pegasuspg.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	HEARING STATEMENT	2

1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Pegasus Group on behalf of Lightwood Land in respect of the Hart District Local Plan: Strategy and Sites (2016-2032). This Statement seeks to respond to the questions raised by Mr Jonathan Manning (Inspector) in relation to Matter 3: Housing – the objectively assessed need for housing and the housing requirement.
- 1.2 Lightwood has a major contractual interest in the identified Area of Search (AoS) for a new settlement at Murrell Green/Winchfield that is identified as part of Hart District Council’s (the Council’s) Vision and Objectives and under Policies SS1 and SS3.
- 1.3 Pegasus Group, acting on behalf of their client, have made representations on the emerging Local Plan at the Regulation 18 and 19 stages. Our responses to the questions and issues raised should be read in conjunction with these representations and the associated evidence base for the AoS.
- 1.4 These representations have been considered against the tests of ‘Soundness’ as defined by Paragraph 182¹ of the National Planning Policy Framework (NPPF) 2012.
- 1.5 This Hearing Statement has been prepared in consultation with Gallagher Estates, the promoter of the Winchfield component of the AoS, as part of the on-going collaborative approach to the promotion and delivery of the future new settlement.
- 1.6 Pegasus Group, on behalf of Lightwood Land, wish to take a full and active part in the hearing session on **Wednesday 21st November 2018** in relation to all parts of Matter 3. Our responses to the questions and issues raised are set out within the remainder of this Statement.

¹ Previously Paragraph 35 of NPPF 2018

2. HEARING STATEMENT

2.1 Within this section of the Statement we identify the relevant question/matter and provide our response within the subsequent paragraphs. All references are consistent with those provided in the 14th September 2018 set of questions.

3.1 Having regard to the transitional arrangements contained in the NPPF 2018 is the use of the standard methodology for calculating housing need justified?

2.2 No, Paragraph 214 is quite clear that for examining plans which have been submitted for examination on or before 24th January 2019 the policies and provisions of the NPPF (2012) should continue to apply. The Hart Local Plan was submitted for examination on 18th June 2018.

2.3 It is understood that the Council chose to move to the Standard Methodology for calculating local housing need based on Table 2 of the consultation document '*Planning for the right homes in the right places*'.

2.4 Lightwood Land consider that making a decision based on this document is not appropriate and the Council should therefore revert back to the previous 'objectively assessed housing need (OAHN) figure in line with Paragraph 214 of the NPPF 2018.

2.5 It is Lightwood's understanding that the Council will look to justify its requirement at examination based on the Hart, Rushmoor and Surrey Heath Strategic Housing Market Assessment 2014-2032 (HOU1a and HOU1b).

2.6 This position was clarified by Councillor Cockarill at Hart's Full Council meeting on 27th September 2018. Within the minutes for this meeting Cllr Cockarill stated:

"Firstly, under the new NPPF transitional arrangements (para 214) we are primarily being examined under the old NPPF 2012 rules which in effect means we are being examined under the 2016 Hart/Rushmoor/Surrey Heath SHMA (Strategic Housing Market Area Assessment) and not the Government's new standard methodology."

2.7 Assuming this clarification is carried forward to the Council's position at examination then Lightwood are supportive of the Council's revised position on this matter.

3.2 Does the use of the standard methodology fulfil the requirements of the first bullet point of Paragraph 47 of the NPPF, 2012?

2.8 No, as per our response to 3.1 above, we agree that the provisions of the NPPF (2012) is most appropriate for the consideration of the housing requirement.

2.9 Paragraph 47 highlights that local planning authorities should seek to "boost significantly" their supply of housing and should:

"use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period."

2.10 The Standard Methodology, whilst introduced, is already the subject of a review which is expected to be completed prior to Christmas 2018. Alongside the publication of the NPPF 2018 the government published 'Government response to the draft revised National Planning Policy Framework consultation' (July 2018) which sets out on page 27:

"It should be noted that the intention is to consider adjustment the method to ensure that the starting point in the plan-making process is consistent in aggregate with the proposals in Planning for the right homes in the right places consultation and continues to be consistent with ensuring that 300,000 homes are built per year by the mid-2020s".

2.11 There is a fundamental difference between the figure which results from an Objectively Assessed Needs Assessment (382) and that provided by the standard methodology (292).

2.12 The standard method identifies a minimum annual housing need figure, it does not produce a housing requirement (Paragraph 002 Reference ID: 2a-002-20180913).

- 2.13 Whilst median affordability forms part of the standard methodology there is no consideration of affordable housing needs or other indicators such as concealed households. The methodology does not automatically take account of unmet need from other authorities within a Housing Market Area. Such adjustments are discretionary.
- 2.14 Equally the ability of local planning authorities to make an uplift to account for employment ambitions are also discretionary. As a result, progressive authorities can seek to achieve higher housing provision rates, but a standard methodology figure does not, in isolation, equate to the requirements of paragraph 47 of the NPPF 2012.

3.3 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?

- 2.15 Lightwood consider this question to no longer be relevant as the Council is not advancing a figure calculated by the standard methodology. Lightwood support such an approach.

3.4 Does or should the housing requirement formally include any unmet need for Surrey Heath?

- 2.16 No, the current housing requirement does not include any unmet need from Surrey Heath, but Lightwood considers that the housing requirement should allow for a scenario where Surrey Heath are unable to meet its housing needs, although the specific figure to be attributed is unknown.
- 2.17 A '*Statement of Common Ground – on matters relating to housing delivery, employment land and the Thames Basin Heaths Special Protection Area*' (24th January 2018) was agreed between Rushmoor Borough Council, Hart District Council and Surrey Heath Borough Council.
- 2.18 At the time of its completion, it acknowledged that Surrey Heath was expecting to be unable to meet its requirement by in the region of 950-1,500 dwellings. Indeed a recent planning committee report (October 2018) for Hawley Park Farm which noted on page 34 that the current shortfall was at least 750 dwellings.

-
- 2.19 Since then, the Rushmoor Local Plan examination has taken place and Rushmoor Council are currently undertaking a six-week consultation exercise (ending on 19th October) on the proposed main modifications to the Plan.
- 2.20 The Rushmoor housing requirement is based on an OAN assessment and does not consider any unmet need from Surrey Heath. It is important to note that at no point has Rushmoor ever agreed to meet any unmet need.
- 2.21 The surplus which does exist within the Rushmoor Plan is in effect a contingency given the risks associated with some of the sites allocated within the Plan which are complex to deliver.
- 2.22 Accordingly, it is now only Hart that that can help address any unmet need from Surrey Heath.
- 2.23 The Surrey Heath Local Plan will follow behind the adoption of both the Hart and Rushmoor Plans and it is unclear at this stage the scale of any shortfall, partly because the standard methodology is as noted above subject to change.
- 2.24 As also discussed above, the Council has recently reverted to the SHMA evidence base for the justification of its housing requirement. At present the SHMA generated figure of 382 does not make any allowance for unmet need from Surrey Heath.
- 2.25 To be clear, Lightwood do not consider an adjustment to the requirement is required given the uncertainties regarding what the final figure might be. However, through the identification of the AoS the Council is making an appropriate adjustment to its supply which allows it to exceed the 382-annual requirement which helps to address any unmet need.

3.5 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 Assessment (SHMA) robust?

- 2.26 Yes, the objectively assessed need figure based on the SHMA is robust as it follows the requisite methodology as discussed above.

-
- 2.27 Lightwood Land, as stated above, consider the use of the standard methodology to be inappropriate and contrary to clear Government guidance as set out by Paragraph 214 of the NPPF 2018.
- 2.28 As per our representations to the Regulation 18 Local Plan consultation we considered that the calculation of 382 dwellings based on the conclusions of the SHMA to be robust.
- 2.29 The rationale which informed this policy decision at the Regulation 18 stage is still relevant now and we are pleased to note that the Council appears to be reverting to this position as per Councillor Cockarill's address to Hart's Full Council meeting on 27th September 2018.
- 2.30 As we have stated above, we consider that this figure makes no allowance for any unmet need from Surrey Heath. At present and during the examination of the Hart Local Plan this figure is unlikely to be fixed. Accordingly, no certainty means it would not be appropriate to adjust the housing requirement for Hart. The alternative to deal with this uncertainty is to boost the Council's supply position which the Council intends to do through the allocation of the AoS.