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19th October 2018

Dear Mr Kemp

Hart District Council Local Plan Examination: Schedule of Matters and Issues for the Examination

Thank you for giving Persimmon Homes (Thames Valley) the opportunity to comment on the Schedule of Matters and Issues identified by the Examining Inspector Jonathan Manning BSc (Hons) MA MRTPI on The Draft Hart District Council Local Plan (2016-2032) submitted for examination on 18 June 2018. We have the following comments to make on the identified matters and issues;

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

The first bullet point of Paragraph 47 of the NPPF 2012 reads;

"To boost significantly the supply of housing, local planning authorities 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"

The Objectively Assessed need for the District has been established by the 2016 SHMA. The figure derived from the report concluded that the Objectively Assessed Need for the District is 382 dwellings per annum. Using the standard methodology calculation applied to Local Plans assessed under the 2012 Framework, the OAN for the District is 292 dpa. Clearly this figure of 292 would fall short of the housing need for the district and the plan would not be compliant with the aims of Paragraph 47.

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?

Although the Hart District Local Plan is being assessed under the 2012 Framework, the ethos of paragraph 60 of the 2018 Framework should be considered when finalising housing numbers for the District. The beginning to Paragraph 60 reads;

*"to determine the **minimum number of homes needed**, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance..."*

Paragraph: 010 Reference ID: 2a-010-20180913 of the Planning Practice Guidance addresses in what circumstances a higher figure than the standard methodology can be considered. The first bullet point reads;

- Where growth strategies are in place, particularly where those growth strategies identify that housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth

There is clear justification for at least a 33% increase over the standard methodology figure of 292 dpa, as the 2016 SHMA sets out the need for a higher housing target based on expected job growth.

Consideration must be given, however, to a further increase over and above the base figure of 292.

The District's Annual Monitoring Report, published March 2018, outlines the number of market and affordable housing completions since 2011. The table found at page 9 shows the following information;

Year	Net Affordable Housing Completions	Net Market Housing Completions	Affordable Housing %
2011-12	208	118	64
2012-13	22	175	11
2013-14	46	218	17
2014-15	70	268	21
2015-16	155	550	22
2016-17	131	492	21

The 2016 SHMA continues this worrying trend of un-affordability within the District by stating in the summary to the market trends section

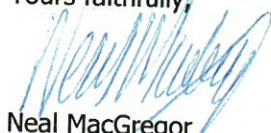
"average prices in the housing market area are around £360,000 and have increased by 25% over the last 5 years despite the housing market downturn".

These two factors, namely the lack of affordable housing provision due to consistent under delivery and increase in house prices, should raise concerns and serious consideration to further increasing the housing numbers for the District, allowing for further sites to be brought forward and subsequently delivering much needed on site affordable housing provision in the District. Fundamentally, the affordability issue and service of provision along the levels proposed are likely to push provision even higher compounding the problem.

We would like to register to participate in the oral aspect of the hearing, specifically on Wednesday 21st November 2018 to discuss Matter 3 – Housing: the objectively assessed need for housing and the housing requirement. The session would be attended by my colleague, Rob Clark.

I look forward to your confirmation of our participation in due course.

Yours faithfully,



Neal MacGregor
Senior Planner

Persimmon Homes Thames Valley