

HART LOCAL PLAN STRATEGY AND SITES 2016-32 EXAMINATION

HEARING STATEMENT - MATTER 4 HOUSING

THE SPATIAL STRATEGY OF NEW HOUSING

On behalf of:
Wilbur Developments Ltd

Respondent ID: 124

Date:
October 2018

Reference:
LR/06014/LP Examination Matter 4

1.0 Introduction

- 1.1 This statement is prepared on behalf of Wilbur Developments Ltd, the promoters of land West of Hook, in relation to **Matter 4: Housing – The Spatial Strategy for New Housing** and provides their response in turn to **Questions 4.3, 4.10, 4.12** and **4.13** raised by the Inspector:

2.0 Response to the Inspector's Questions

Question 4.3: Is the proposed distribution of housing set out in Policy SS1 supported by the Sustainability Appraisal, and will it lead to the most sustainable pattern of housing growth?

- 2.1 The statement prepared in relation to Matter 1 sets out Wilbur Developments Ltd's case on this point in detail. In short, that statement demonstrates that the process of sustainability appraisal undertaken as part of the Plan's formulation is not robust, consistent or rational. As a result, the distribution of housing proposed by Policy SS1 will not lead to the most sustainable pattern of housing growth. Their concerns expressly relate to the soundness of the assessment of the new settlement Area of Search (AoS) at Murrell Green/Winchfield (MG/W) relative to the other reasonable alternatives. It is considered that the SA scoring is irrational and is not justified by available evidence, and that it has too keenly sought to support the strategy set out in Policy SS1. As a result, the plan does not adopt the most sustainable pattern of housing growth which should include other identified options, including option 4a, in advance of the new settlement.

Question 4.10: Is there a need for a new settlement at Murrell Green/Winchfield within the Plan period?

- 2.2 As is explained in relation to Matter 3, the housing requirement set by the Plan is not sufficient to meet the needs identified in the District. The Plan has been prepared based upon the standard methodology and has not paid adequate regard to the specific needs of the District identified within its evidence base, especially the need for affordable housing. There is a need therefore for the Plan to adopt the OAN identified by the 2016 SHMA as its starting point, to provide for additional growth within the plan period to address affordable housing needs, and to allocate sites accordingly. The only sound mechanism for achieving this though is not a new settlement but rather the allocation of 'oven ready' settlement extensions, which unlike the AoS, have already undergone significant testing and can deliver new homes quickly.

Question 4.12: Is there sufficient evidence to suggest that a new settlement can be delivered in Murrell Green/Winchfield, without causing significant impacts to the surrounding area and infrastructure?

- 2.3 The new settlement AoS is purely conceptual at this stage and has not yet been the subject of any thorough testing. This will not take place until the preparation of the DPD and masterplan commence. In the circumstance where the growth the settlement would provide is not needed within the plan period but is there to meet future, as yet unidentified need, as is the premise of the Plan as drafted, this might not be such a concern. However, that need exists now and there is at this stage insufficient evidence to show that a new settlement can be delivered without causing significant harm. Other options for meeting additional growth exist that have already been the subject of extensive assessment and would score better than the new settlement solution on any rational consideration of reasonable alternatives.
- 2.4 Notwithstanding the final scoring of the alternatives, the commentary contained in the Sustainability Appraisal in relation to the new settlement makes it clear that there remain significant uncertainties regarding all the constraints associated with the AoS and the extent to which these can feasibility be mitigated and that as a result it is difficult to draw conclusions. Disproportionate weight in placed on the responses received from the likes of Natural England, Historic England and Thames Water, which are nothing more than high-level, non-committal responses that identify the issues that need to be taken in to account when the detailed work gets underway.

Question 4.13: The Council suggest that the new settlement is needed to deliver a much-needed secondary school. However, given that 90% of the proposed supply has already been granted planning permission, is this the case?

- 2.5 The fact that 90% of the supply identified to meet the current proposed housing requirement is already committed and that agreement exists with the Local Education Authority (LEA) regarding the satisfactory provision made by other sites, which can together meet the requirement for additional growth, means that a disproportionate level of weight has been placed throughout the Plan and its evidence base on the ability of a new settlement to provide a new secondary school. It is the case therefore that a new settlement is not needed to deliver a new secondary school at this time.
- 2.6 Further, it must be noted in this regard that no objection has been raised by the LEA to the current planning applications/appeals for the settlement extensions at West of Hook and Pale Lane, Fleet. The response received from the LEA being that the provision of financial contributions towards secondary school provision and student travel is an acceptable response. Thus, the need to make provision for secondary education does not amount to an insurmountable constraint to the alternative strategy proposed by the objectors or a reason to prefer the new settlement over the alternatives.

- 2.7 It is recognised that there exists a long-term aspiration to secure the provision of a new secondary school and that a new settlement would provide a mechanism for achieving this. However, the focus on it as the only means of resolving secondary school capacity issues, fails to give appropriate weight to other available options. This is despite the Interim SA recognising that *"no significant negative effects are predicted for any option, as the significance of the secondary school issue is not entirely clear. There might feasibly be options for addressing capacity concerns in the future without a new settlement"* (page 22).

3.0 Proposed Changes

- 3.1 See suggested changes in relation to Matters 1 and 3. The proposed housing requirement should be increased to 7,760 dwellings so that it adequately meets the needs of the District, and additional new, deliverable, sites should be allocated to meet this. Those sites should evolve from a robust and objective updated process of sustainability appraisal.