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MATTER 4 HEARING STATEMENT

Hart District Council Local Plan Examination

SUBMITTED ON BEHALF OF WATES DEVELOPMENTS LIMITED

October 2018

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1 INTRODUCTION

- 1.1 This statement has been prepared on behalf of Wates Developments Limited ('Wates'), the promotion party and developer relating to the potential development of up to 700 residential dwellings, site for primary school, Suitable Alternative Natural Greenspace (SANG) and community facilities at Pale Lane, Fleet.
- 1.2 This Statement is made following the submission of the Hart District Council ('HDC' or 'the Council') Local Plan to Secretary of State for examination. We note and approve of the scope of examination as detailed by yourself in the 'Schedule of Matters and Issues for the Examination'. This Statement covers those questions posed within Matter 4 – Housing: the spatial distribution of new housing.
- 1.3 For the submitted Local Plan, Wates has submitted duly made representations to each stage of the Local Plan production. This includes submissions to the Council's Regulation 19 consultation on the submission draft plan, where comment was made on the soundness of the Plan, the Sustainability Appraisal and Strategic Housing Land Availability Assessment. This submission must be read in the context of, and in conjunction with, these earlier representations.
- 1.4 In accordance with the transitional arrangements of the 2018 National Planning Policy Framework (NPPF) and as stated within the 'Guidance Note' to this Examination, the Plan will be assessed against the policies of the 2012 NPPF. Unless specifically stated, where the NPPF is made, this will be referencing the 2012 iteration.

2 MATTER 4 – HOUSING: THE SPATIAL DISTRIBUTION OF NEW HOUSING

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 Our submissions to the Matter 1 hearing has detailed the deficiencies of the Sustainability Appraisal (SA) leaving it as an unreliable source from which to support the Spatial Strategy.
- 2.2 Policy SS1 is unsound by way of it failing to plan for the full Objectively Assessed Needs (OAN) of the District¹. In this context, Option 1b as suggested by the SA cannot be considered the most appropriate, or at all sound, strategy to achieve a sustainable pattern of housing growth.
- 2.3 At present, the Plan is reliant on existing commitments, sporadically approved through speculative applications in the absence of an up-to-date plan. Given shortcomings of policy SS1 in meeting the housing needs of the District, further allocations in addition to the existing commitments will be required. This will help create the beginning of a plan-led strategy as envisioned within the NPPF.

¹ See Matter 3 Statement

- 2.4 We consider Policy SSS1 has not been positively prepared HDC has dismissed the most effective method of achieving residential development, namely the use of sustainable urban extensions which are specifically encouraged in the NPPF (paragraph 52). By rejecting the use of sustainable urban extensions, we contend the Spatial Strategy will not be effective in achieving the proposed aims of the Local Plan and Vision of HDC.
- 2.5 Setting aside the inaccuracies in its assessment, which would have led to a more favourable score, the February 2017 SA recognised that the delivery of Pale Lane represented the most sustainable urban extension and preferred growth option when addition housing is required.
- 2.6 The only change within the August 2018 SA was the introduction of potential sub-options, incorporating the potential for a new settlement at Murrell Green/Winchfield. These are considered by the Council as the preferred spatial options; however, as demonstrated within our Matter 1 Statement, this is based upon a biased and inaccurate assessment.
- 2.7 Furthermore, there is no substantial evidence upon which the new settlement can be relied upon for delivery any quantum of development within the Plan, this is reflected in the Council's omission of the new settlement from its Spatial Strategy.
- 2.8 Accordingly, the SA supports the inclusion of the inclusion of urban extensions to its key service centres, in particular Pale Lane which is located adjacent to the sole Main Urban Area and Tier 1 settlement in the District.
- 2.9 In order to make Policy SS1 sound it will be necessary to revise the number of homes to be delivered in the Plan period to in order to meet the full OAN for the District with the necessary uplift for market and affordability signals.
- 2.10 Whether or not the housing requirement is changed, the strategy in Policy SS1 should be revised to include sustainable urban extensions, which can be delivered quickly, and in particular, the Pale Lane site.

Hartland Village

- 2.11 As Hartland Village comprises a committed site it is questioned whether it is appropriate for it to remain as an allocation, given policy SS2 solely reflects the planning permission granted.

Murrell Green/Winchfield

- 2.12 The Plan makes no attempt to justify the inclusion of a new settlement based upon its own conclusions on housing and employment needs. Whilst we have concluded that the full OAN of the District is higher than currently planned for, this can sustainably be met by the inclusion of a sustainable urban extension at Pale Lane.
- 2.13 There is no evidence in order to justify the need for the new settlement to be included in this iteration of the Plan, with it not intended to form part of the housing trajectory or reliant upon for particular infrastructure. Given the amount of detail and evidence the Council seeks to defer to a subsequent New Settlement Development Plan Document, it is clear the Council does not believe it capable at this point of suitably evidencing the deliverability of the site to a point where the principle of development is accepted.

- 2.14 In particular, the Plan and its supporting evidence makes a point that a significant benefit of the proposal is the delivery of a new secondary school at the site. However, it is not asserted by the Council that the delivery of a new secondary school is required in order to deliver any other development proposed within the Plan's housing trajectory.
- 2.15 Indeed, given over 90% of the sites within the Plan currently benefit from planning permissions, it is to be assumed that Hampshire County Council (HCC) is content that each of these developments can be delivered without a negative impact on existing secondary school infrastructure, subject to the appropriate obligation payments and implementation of the planned school expansions.
- 2.16 It is evident that even the addition of the Pale Lane site can be delivered prior to a new secondary school being delivered. In its representations to Wate's ongoing application on the site, HCC confirmed that obligations proposed to contribute to the expansion of Calthorpe Park School were suitable to accommodate future secondary pupil yields.
- 2.17 Whilst we commend the Council for seeking to positively plan for its development needs beyond the proposed Plan period, Policy SS3 makes an absolute commitment to the principle of the site in lieu of robust evidence. By unnecessarily including the new settlement within this Plan, it prejudices any Local Plan Review that may conclude on more sustainable alternatives.
- 2.18 Furthermore, given the Vision and Objectives of the Plan both include the aspiration for delivering a new settlement, the provision of this site forms part of the fundamental structure of the Spatial Strategy, even should a failure of its delivery not necessarily result in a failure to meet local housing and economic needs. If the Plan is to be considered effective, it will need to be demonstrated that the new settlement is deliverable.
- 2.19 Murrell Green/Winchfield is not sustainably located and cannot easily be integrated into existing infrastructure. The SA² acknowledges that degree of self-containment of the new settlement will be "*limited*". In reality, the development will result in a large proportion of development onto the local road network, the cumulative impacts³ of which have not been assessed by either the Council or the site promoters⁴. Indeed, with no settled quantum of development proposed within either the Plan or the SA, an informed assessment of the impacts cannot be undertaken.
- 2.20 Whilst Murrell Green is not within the Strategic Gap, its development would cause the coalescence of Hartley Wintney and Hook. Furthermore, at paragraph 161 (Landscape), there is reference for the potential development at Murrell Green having an adverse impact on the rural landscape and character and this harm was further evidenced in the Council's SHLAA assessment, where it was concluded, "*development of this site would cause*

² Page 22 of the August 2018 SA

³ Factoring growth from the Local Plan Housing Trajectory and additionally Murrell Green/Winchfield

⁴ Noting the Council's TA does not include provision of the new settlement and a separate assessment has been undertaken on a purely site specific level. The cumulative impacts have not been assessed.

a loss of the rural landscape that separates Hook and Hartley Wintney and is likely to cause visual intrusion to the area”.

2.21 The Health and Safety Executive (HSE)⁵ criticised the Council for not clearly marking on a map the Major Accident Hazard pipelines that pass through Hart, including the Southern Gas Networks High Pressure Pipeline – HSE Reference: 7068 Bramshall/Froyle (PO66), which runs under Murrell Green.

2.22 The promoter to Murrell Green development has proposed to divert and upgrade the pipeline as part of the development proposals. Whilst this sounds an intriguing prospect, the cost implications will be in the millions. At no point in its representations has the promoter sought to assess the cost and timing implications of such an intervention.

2.23 Indeed, there is a failure of there to be any comprehensive evidence that the new settlement would be viable at all. The sole study⁶ on viability applies a standard methodology to what is in no way a standard site delivery.

2.24 No appreciation has been had to the site specific infrastructure required as part of a new settlement, both in terms of utility connectivity to a relatively remote location, as well as the various infrastructure promises made to justify the delivery of the site. For Murrell Green, this includes:

- Considerable flood alleviation scheme to overcome areas of Flood Zone 2/3 within the site;
- Primary and secondary schools;
- Diversion and upgrade of high pressure gas main;
- Delivery of “Smart Solutions” as part of Smart City plans⁷;
- New bus routes;
- SANG provision above and beyond accommodating its own needs⁸.

2.25 This above the norm infrastructure provision needs to be reflected within the assessment if it is to be demonstrated that the development is viable in line with footnote 11 of the NPPF. However, the Council’s Viability Study assumes infrastructure costs for Murrell Green to be in line, or less than standalone urban extensions that do not require to provide such lofty infrastructure.

2.26 There are also considerable uncertainties to the principle, location, timing and scale of any development at Winchfield/Murrell Green. The land is not in the control of a single party or indeed a consortium of landowners. Individual representations have been provided by the respective promoters, and despite a notional attempt to

⁵ HSE representations to Draft Local Plan Strategy and Sites (May 2017)

⁶ ECO3a-d

⁷ NSP6 – Murrell Green Letter from Bosch

⁸ Lightwood Reg 19 representations paragraph 6.8

show both designs on a single plan, individual masterplans have been produced. There is no natural cohesion or connectivity between the two sites.

2.27 It is unavoidable that both sides will do their utmost to prioritise delivery of their own site in advance of the other, especially with each site suggesting their capability of accommodating the sort of scale anticipated by the Council for the new settlement.