



Gladman Developments Ltd

Examination of the Hart Local Plan 2016 - 2032

Matter 4 – Housing: the spatial distribution of new housing

4.2 Is Policy SD1 justified and consistent with national policy, namely Paragraph 14 of the NPPF, 2012?

Gladman support the inclusion of Policy SD1, which sets out the Local Planning Authority's commitment to making local planning decisions based on a presumption in favour of sustainable development. It provides assurance of a local approach to planning that is proactively seeking to improve the social, environmental and economic well-being of the area, confirming that the process of 'weighing up' the relevant factors in decision making will aim to strike an appropriate 'planning balance' across the three pillars of sustainability.

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?

It does not appear that Hart has carried out any assessment of the needs of individual settlements of the district to inform the proposed distribution of housing. It is apparent that extant planning permissions have not directed the correct amount of growth to the most sustainable settlements. For example, Yateley is the second largest settlement in the district and an identified District Centre yet receives one residential allocation that has already been granted planning permission over the plan period. Gladman suggest that this distribution will need rebalancing and believe that further medium sized site allocations are required to do this.

In Gladman's view, what the Council should have sought to do was to rectify imbalances by proactively determining the quantum of housing that would be required in each settlement to ensure the ongoing vitality and viability of it services and facilities throughout the plan period. As a minimum, at the end of the plan period settlements should not experience a deterioration in the support of services in settlements as a result of not having been apportioned sufficient and meaningful growth.

It cannot therefore be said that Policy SS1 has not been supported by the Sustainability Appraisal because there has been no consideration of what the necessary requirements of each settlement would be. Consequently, it is difficult to determine whether the current pattern of housing growth is sustainable let alone the most sustainable option for the plan.

4.4 Does the plan unreasonably restrict new development in rural areas? How will the housing needs of rural communities be met?

The Local Plan unreasonably restricts new development in rural areas as it currently unnecessarily stifles sustainable growth opportunities on the edge of settlements. This is at odds with national policy, seeking to boost significantly the supply of housing and applying a presumption in favour of sustainable development.

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The Local Plan should be amended to be flexible enough to be able to accommodate new development outside of existing development boundaries, to allow the Council to quickly address any issues in shortfall in housing supply against the plan requirement. Gladman recommend that the Council should incorporate a criteria-based policy to achieve this as such an approach would allow the plan to protect itself against unsustainable development at the same time being open and flexible to additional development opportunities to come forward to meet identified needs. As an example of how such a policy could be applied Gladman refer to the submission version of the Harborough Local Plan, Policy GD2, which states:-

"In addition to sites allocated by this Local Plan and neighbourhood plans, development within or contiguous with the existing or committed built up area of Market Harborough, Key Centres, the Leicestershire Principal Urban Area (PUA), Rural Centres and Selected Rural Villages will be permitted where..."

A series of criteria then follows.

In contrast, the Council's approach to rural areas or the Countryside as expressed in Policy NBE1 a much more rigid approach by stating development will only be supported if it adheres to strict exemptions set out in the Policy, which also affords no ability for development boundaries to flex.

Whilst clearly the policies the policies in Hart should reflect local circumstances, the Harborough example does show how other local authorities are taking a proactive approach to guiding development, and ensuring that they can meet their housing targets and can plan for approaches if and when problems arise over the course of a plan with the delivery of allocated sites. This is more in-keeping with the spirit of the presumption in favour of sustainable development and the notion of taking a position approach, as is rightly reflected in Policy SD1.