

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

HEARING STATEMENT

MATTER 4: HOUSING – THE SPATIAL DISTRIBUTION OF NEW HOUSING

ON BEHALF OF LIGHTWOOD LAND

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

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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 4: Housing - the Spatial Distribution of New Housing.
- 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, on behalf of Lightwood, wish to take a full and active part in the hearing session on **Thursday 22nd November 2018** in relation to all parts of Matter 4. Our responses to the questions and issues raised our 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.

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?

2.2 Yes, Lightwood considers that the proposed distribution of housing set out in Policy SS1 is supported by the Sustainability Appraisal and will lead to the most sustainable pattern of growth. As we have set out within our Statement concerning Matter 1, Lightwood are broadly satisfied that SS1 leads to the most sustainable pattern of housing in accordance with Paragraph 35 of the NPPF 2018.

2.3 Lightwood is fully supportive of the identification of the Murrell Green/Winchfield AoS via Policy SS1. Such an identification takes the opportunity to assist in meeting the development needs of the present as well as those in the medium to long term and is in accordance with the provisions of Paragraph 14 of the NPPF 2012.

2.4 Lightwood acknowledges that the Local Plan is aspirational, but the content is both realistic and seeks to plan positively for the long term requirements of the District which is in accordance with paragraphs 154 and 157 of the NPPF.

2.5 Identifying the AoS will provide the Council with significant flexibility to adapt to rapid change. Policy SS1 will allow the new settlement DPD to be produced and planning applications and decisions to be made in a timely manner with delivery in the middle part of the Plan period where the Council's own trajectory sees a decrease (Figure 1 Housing Trajectory, Housing Numbers and Spatial Strategy Topic Paper (TOP1)).

Murrell Green/Winchfield

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

2.6 Yes, there is a need for a new settlement at Murrell Green/Winchfield within the Plan period. This need can be divided into three parts:

- Numerical need;
- Flexibility need; and
- Potential exported need.

Numerical Need

- 2.7 The latest ONS data regarding workplace affordability ratios (median house prices/median gross annual earnings) shows for Hart a figure of 10.92 in 2015, rising to 11.97 in 2016 and increasing again to 11.99 in 2017.
- 2.8 This indicates that house prices are increasing at a faster rate than average incomes, thus it is becoming less affordable to live within the District.
- 2.9 As set out in the Council's Affordable Housing Background Paper (HOU5) there is estimated to be a substantial shortfall in affordable housing within the HMA when current supply is considered against the identified housing needs to 2032.
- 2.10 Table 2.2 of the Paper (HOU5) identifies a shortfall in the order of **300 dwellings** in Hart each year through to 2032. This would equate to a total of 4,928 new affordable dwellings during the remainder of the Plan period.
- 2.11 The Paper recommended making an adjustment to the requirement to help address the current shortfall. Any increase in requirement needs to be supported by a concurrent increase in housing land supply.
- 2.12 The AoS would deliver a policy compliant (40%) level of affordable housing. At the planned scale of at least 5,000 new dwellings this would make a significant contribution of 2,000 additional affordable dwellings once the scheme has been completed. This would be equivalent to 6.4 years of affordable housing need as identified by the HMA for Hart.
- 2.13 The Council in taking forward a housing requirement of 382, which is robust, will not meet their full affordable housing need. Lightwood do not consider that an increase in the requirement is necessary. However, in identifying the new settlement within this Plan results in a defined supply boost during the middle-latter part of the plan period.

Flexibility need

- 2.14 Much of the Council's land supply to meet the minimum requirement already benefits from planning permission. The Housing Numbers and Spatial Strategy Topic Paper (TOP1) identifies that from 2024/25 the projected delivery is anticipated to be significantly below the identified need per year.
- 2.15 We are mindful on this basis of the requirements of the new Housing Delivery Test, which requires consistent delivery. Therefore, to ensure a continuous supply of housing, which is identified by the Council as one of their Local Plan Objectives (CD1) the Council needs to identify land for delivery in the second half of the plan period.
- 2.16 Securing the AoS now will ensure that additional flexibility is provided to the Council's supply trajectory with units being delivered towards the middle of the plan period as confirmed unit supply declines as confirmed by the Housing Numbers and Spatial Strategy Topic Paper (TOP1).
- 2.17 The identification of the AoS now will allow pre-delivery work (e.g. progression of a DPD, submission of applications, discharge of conditions) to be undertaken with certainty to ensure that delivery is in line with the Council's needs.
- 2.18 Flexibility would also be created in the delivery of strategic infrastructure, in particular the secondary school which has been a key Education Authority request since the outset of the Local Plan process.
- 2.19 Much of the Council's land supply already benefits from planning permission and due to the scale of those sites, none have been able to deliver either a new school (individually or cumulatively).
- 2.20 Whilst it has been possible to mitigate impacts at existing sites this is not a long-term solution. Indeed, as set out in the Housing Numbers and Spatial Strategic Topic Paper (TOP1) existing schools cannot feasibly continue to expand i.e. Calthorpe Park School would need to expand to either a 14 or 16 form entry.
- 2.21 The identification of the AoS now gives assurance to the comprehensive planning of a new secondary school and therefore provides the Education Authority with additional flexibility in their school places planning.

Potential exported need

- 2.22 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.
- 2.23 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.
- 2.24 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.
- 2.25 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.
- 2.26 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.
- 2.27 Accordingly, it is now only Hart that that can help address any unmet need from Surrey Heath.
- 2.28 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.
- 2.29 Accordingly, Lightwood consider that it is pragmatic to have flexibility within the Council's supply trajectory to deal with this potential requirement. Lightwood reaffirm the view that as the level of any unmet need is unknown it is not necessary to adjust the requirement.
- 2.30 The Council's approach in identifying the Area of Search fulfils the key objective of sustainable development as set out by Paragraph 7 of the NPPF 2018 which is:

"to meet the needs of the present without compromising the ability of future generations to meet their own needs."

4.11 The Housing Topic paper suggests that houses could be delivered by 2024 (a six-year period from now). Is a long lead in time therefore required to deliver the new settlement, as suggested by the Council?

- 2.31 Yes, a long lead in time is required to deliver the new settlement.
- 2.32 The Plan as currently drafted would identify an Area of Search and secure the next step in the delivery of a new settlement via the production of a Development Plan Document in line with the requirements of Policy SS3. From the approval of the DPD, both Outline Planning Permission and Reserved Matters consents would need to be secured. Commencement would only occur after the discharge of relevant planning conditions.
- 2.33 Lightwood Land agree that units could start to be delivered by 2024 in line with the Council's trajectory. At this point there is a significant reduction within the Council's predicted delivery (Housing Numbers and Spatial Strategic Topic Paper (TOP1)). The new settlement would by this stage be able to start helping to address this gap.
- 2.34 Such a trajectory is achievable in as the land associated with the AoS is already assembled. To provide the benefits discussed within our response to 4.10 above a policy hook needs to be secured within this plan.
- 2.35 The introduction of the Housing Delivery Test through the NPPF 2018, requires authorities to maintain a consistent rate of housing delivery measured over a three-year period. Based on the Council's trajectory, Lightwood considers that they could face difficulties during the middle/latter part of the plan period without the new settlement.
- 2.36 A positive decision to identify the AoS must be taken now rather than waiting until a subsequent review as any delay will result in delivery being too late to have a meaningful impact on delivery both of housing and the secondary school and would not provide sufficient flexibility to adapt to change as required by the NPPF 2012.

2.37 It is clear from the Council's Sustainability Assessment and wider evidence base that the Murrell Green/Winchfield AoS is the most suitable location in which to provide a new settlement. This is because of years of planning, joint working and consultation to get to the point of examination. Accordingly, delivery of the AoS is far longer than 6 years from examination, if an alternative strategy were to be pursued.

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?

2.38 Yes, there is sufficient evidence to conclude a new settlement will not cause significant impacts.

2.39 It is important to note that Policy SS3 (as currently drafted) only seeks to identify an AoS in which a new settlement could be delivered following a robust master planning process. Accordingly, the level of evidence must be proportionate and commensurate with the level of allocation.

2.40 It is Lightwood's opinion that the evidence prepared and submitted to the Council far exceeds the minimum requirements and this provides more certainty than might otherwise be expected for an AoS. This technical evidence has been prepared following consultation with statutory consultees where appropriate.

2.41 The evidence base, as set out within Table 6 of the Statement of Common Ground between the Council and the Promoters of the Murrell Green/Winchfield AoS, covers the full array of technical disciplines including transportation, ecology and flood risk and drainage.

2.42 The conclusions of these reports all serve to prove that no substantive technical concerns exist with most matters being capable of being dealt with (e.g. gas pipe network) through the master planning and delivery processes. The outcomes therefore give confidence to the conclusion that there are no substantive technical issues which cannot be resolved.

- 2.43 Where mitigation is required the promoters have agreed to implement those measures as part of the proposals. For example, the detailed liaison with the Highway Authority to agree which junctions require assessment. From this assessment necessary upgrades and junction improvements are known to be required to be delivered as part of the new settlement without any external funding.
- 2.44 Such a conclusion is reflected within the Council's Sustainability Appraisal (February and August 2018) which concludes of the new settlement options considered that Murrell Green/Winchfield does not result in any significant environmental impacts. The only exception is in relation to land and other resources which would be common to any new settlement option given the scale of development proposed.
- 2.45 Indeed, the Murrell Green/Winchfield option gives rise to substantial benefits in the form of the delivery of housing and to accessibility given the site's proximity to the main railway line at Winchfield.
- 2.46 Lightwood Land therefore consider that no significant impacts, other than those which are inevitable at this scale of development, to the surrounding area and infrastructure and such a conclusion is supported by a proportionate and robust evidence base.

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?

- 2.47 Yes, a new settlement is needed to deliver a much-needed secondary school.
- 2.48 The NPPF 2018 at paragraph 72 states:

"The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided that they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of communities and with other authorities if appropriate, strategic policy making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way."

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- 2.49 Although most of the Council's identified supply already benefits from planning permission, they are not comparable to a new settlement.
- 2.50 Whilst it is true that the permitted schemes have mitigated their impact (via financial contributions) to the satisfaction of the education authority, none has been able to deliver a new secondary school, either individually or cumulatively.
- 2.51 As the Council have made clear within their Housing Numbers and Spatial Strategic Topic Paper (TOP1), there is a finite scope for further expansion at existing sites such as Calthorpe Park, Fleet and Robert May's, Odiham.
- 2.52 Given that existing expansion is limited, plans need to be put in place to deliver a new school in the longer term. Indeed, as set out within TOP1 Hampshire County Council have identified additional secondary school places will be required by 2025 arising from existing growth.
- 2.53 The need for a new secondary school has consistently been identified throughout the Local Plan process.
- 2.54 Planning and delivery of a new secondary school will not happen immediately, however taking an early decision to plan for a new secondary school as part of a new settlement gives certainty to Hampshire County Council as Education Authority regarding appropriate resourcing and as importantly creates flexibility and reduces continued pressure on existing sites.
- 2.55 More dispersed secondary school options, in the form of a new facility, may well result in a more sustainable option as children have to travel shorter distances to school and a more comprehensive education provision can be made as set at Paragraph 3.17 of the Housing Numbers and Spatial Strategy Topic Paper (TOP1).

4.14 Is the area of search in terms of its boundary justified?

- 2.56 Yes, Lightwood considers that the boundary, to the extent it includes land within Lightwood's Control for the Area of Search is justified as it relates to land parcels which are within the control of the core two promoters of the Murrell Green/Winchfield AoS.
- 2.57 The boundary as shown within the Local Plan has been identified because of the evolution of the Local Plan and supporting SA process.

- 2.58 Both Lightwood Land and Gallagher Estates have agreed to work together and at present have joint concept plans and a joint technical note. Both parties have a well evidenced technical understanding of the requirements of their respective land parcels which gives credibility regarding the overall deliverability of land in this location.
- 2.59 This technical work has been based on an assumed quantum of development resulting from the AoS at approximately 5,000 houses based on land currently available. Lightwood consider that there are further opportunities to expand the boundary should other land become available.
- 2.60 Both parties have also agreed to work with the Council to facilitate the delivery of the new settlement at this quantum and it is understood that the Council is making a submission for Garden Community status at this level.
- 2.61 The AoS, as defined by the Local Plan, encompasses land beyond the control of both promoters. This additional land is relatively unconstrained, logical (by reference to its geography) and would be beneficial to the longer-term delivery of a new community in this area.
- 2.62 The Council has, in our opinion, provided a sound and robust Sustainability Assessment of the suitability of the Murrell Green/Winchfield AoS. This concludes that it would not give rise to any significant environmental effects.
- 2.63 The land identified provides sufficient flexibility for the future DPD to build upon in order to create a sustainable and comprehensively planned new settlement in line with the Council's vision.

4.15 Are the criteria set out within Policy SS3 justified?

- 2.64 Yes, subject to the following amendments.
- 2.65 Lightwood's representations to the Regulation 19 Plan (March 2018) are of relevance. Lightwood Land within those representations fully endorsed the high-level principles set which remain within the Examination draft.
- 2.66 Lightwood Land made a small number of suggested amendments which sought to clarify aspects of the policy. We provide our suggested revised policy wording are provided overleaf.

Policy SS3

Permission will be granted for the development of a new settlement to be identified from the area of search identified on the Policies Map following the adoption of a New Settlement Development Plan Document and agreed comprehensive masterplan.

Development proposals will not be permitted which would prejudice the delivery of a new settlement in advance of a robust master planning process.

The development of the new settlement proposals will be based upon the following high-level principles:

- a) Of a scale to support long term development needs beyond 2032 and the provision of key infrastructure and community facilities including a secondary school;
- b) ~~The potential to~~ Delivery of new homes, and supporting infrastructure from the middle of the plan period;
- c) Comprehensively planned in consultation with existing communities and key stakeholders;
- d) Delivery of a sustainable, inclusive and cohesive community promoting self-sufficiency and with high levels of connectivity, ~~minimising separation of communities by existing barriers~~ maximising the achievement of linked neighbourhoods;
- e) Delivery of innovative and forward thinking solutions and technology to design, ~~transport issues, telecommunications and~~ measures to mitigate and adapt to climate change in respect of all features of the built and natural environment, including exploring new technologies and/or future proofing the design to accommodate technology advances over time;
- f) Provision of an appropriate mix of housing in terms of size, type and tenure to be informed by the Local Plan, up to date evidence and the policies in the New Settlement DPD; ~~in accordance with relevant policies in the local plan and most up to date evidence at the time for affordable housing, specialist provision for the elderly and self build;~~
- g) Inclusion of measures to avoid and mitigate any adverse impact of the development upon the Thames Basin Heaths Special Protection Area;
- h) Promotion of health and wellbeing and self-containment by providing the necessary supporting infrastructure including green infrastructure, community facilities, employment, education, retail and health care services;
- i) Provision of the most appropriate location within the area of search for key infrastructure, particularly the new secondary school in the most suitable/appropriate location, having regard to maximising ease of accessibility and to catchments;
- j) Achievement of a layout and form of development that avoids coalescence with existing settlements and does not undermine their separate identity; respects the landscape character and conserves and where possible enhances the character, significance and setting of heritage assets;
- k) Provision of measures to avoid, mitigate or offset direct and indirect biodiversity impacts across the site, including opportunities for net gains in biodiversity where possible;
- l) Supported by a transport assessment and strategy, together with an infrastructure delivery plan that ensures the necessary supporting infrastructure is delivered in a timely fashion and promotes sustainable transport modes including optimising Winchfield Station as a public transport node;

Policy SS3 Cont

m) Measures to fully address flood risk and drainage issues.

The detailed framework setting the nature, form and boundary of the new community will be set out in a future Development Plan Document (DPD). As part of the DPD plan making process, the evidence base justifying the area of search/ broad location will be developed for site allocation and framework planning purposes. Development management Policies within the Local Plan will be considered and applied where appropriate having regard to the site-specific circumstances. However, the evidence base for and preparation of the DPD may recommend bespoke policies for a new settlement, drawing on district wide policies. and ~~Supplementary Planning Documents where required.~~

~~Mechanisms will also be required which ensure~~ The DPD will ensure that a comprehensive and deliverable master-planning and phasing plan is put in place. This will ensure the optimum arrangement of land uses, and that the delivery of housing is supported by the timely delivery of supporting infrastructure. ~~properly coordinated across site ownership boundaries to ensure that key items of infrastructure are delivered in a consistent and cohesive way regardless of landownership or phasing.~~