

**HART DISTRICT COUNCIL: EXAMINATION OF THE HART DISTRICT COUNCIL LOCAL PLAN: STRATEGY AND SITES (2016 – 2032).**

Written Statement on behalf of the Baker Family with respect of land west of Varndell Road, Hook and Flavia Estates with respect of land at Owens Farm, Hook.

**Matter 4 – Housing: the settlement hierarchy and spatial distribution of new housing – Thursday 22 November 2018**

4.1 Is the settlement hierarchy set out in the Plan justified and based on up-to-date evidence?

- 1 The representation to the draft submitted Plan regarding policy NBE4 referred to Policy NRM6 of the South East Plan which was retained by the Secretary of State when the remainder of the document was revoked. As noted in the representation, “**Policy NRM6 makes it clear that priority should be given to directing development to locations where potential adverse effects can be avoided within the need for mitigation measures.**” Since policy NRM6 relates to a site protected under the Birds Directive – Thames Basin Heaths Special Protection Area, the approach in paragraphs 14 and 119 of the Framework apply, particularly taking account of the ECJ Sweetman judgement.
- 2 The representation (with respect of policy SS3) referred to the objection to the Murrell Green/Winchfield area of search on the basis that it “**cannot perform as strongly having regard to the NPPF core planning principle [paragraph 17] that seeks fullest possible use of public transport**”.
- 3 These concerns equally apply to the Council’s Settlement Hierarchy (OTH1), which as recognised by the authority (paragraph 42 of the Submitted Plan), was prepared in 2010. It therefore predates the guidance within the NPPF (2012).
- 4 Consequently, the authority should have reviewed the hierarchy taking account of the approach in the NPPF. Whilst Hook has a lower population than Fleet, Yateley and Blackwater, it has more employment floorspace than the other locations and benefits from a frequent rail service (like Fleet) to other destinations towards London, Woking, Basingstoke and Southampton. The western side of Hook is also beyond the 5km zone of influence around the Special Protection Area (see figure 4). Based on these factors, it is contended that Hook should be included within the same tier of settlement hierarchy as Fleet.

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?

- 5 As detailed in the response to question 4.1, it is not considered that the Council’s distribution of housing will lead to the most sustainable pattern of housing growth.

4.5 Are the identified settlement boundaries in each case justified?

6 No. See response to question 4.6.

4.6 Paragraph 103 of the Plan states that settlement boundaries will be reviewed through a future Development Plan Document. Is this justified?

7 As explained in the response to questions 3.5, 5.12 and 5.13, it is not considered that sufficient land has been identified to accommodate the district's housing need (including an allowance for unmet needs from elsewhere within the HMA). Consequently, this Plan should include further revisions to settlement boundaries to address this further need. As detailed in the response to question 4.1, 2 parcels of land on the western side of Hook should be a location where an adjustment to settlement boundaries must occur within this plan to both contribute towards addressing the overall housing needs and the maintenance of a five years housing land supply.

**Hartland Village**

4.8 Can the site be delivered as proposed, without causing unacceptable impacts on the surrounding area and infrastructure?

8 The representation to the draft Local Plan detailed our concern that Hartland village will not be delivered as proposed. Due to the expected delays in delivery, the timing for implementation of mitigation measures will correspondingly occur later generating unacceptable impacts on the surrounding area.

**Murrell Green/Winchfield**

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

9 The statements to questions 3.5, 5.12 and 5.13 detail why the draft Plan does not currently plan for a sufficient quantum of development alongside a Plan period consistent with national policy. Although the shortfall identified in the response to question 5.13 could support consideration of a new settlement at Murrell Green/Winchfield, we advocate that in the first instance, further land west of Hook should be allocated. Land west of Hook is an acknowledged sustainable location which on the scale we envisage, avoids any need to provide mitigation for impacts upon the Thames Basin Heaths Special Protection Area, as required by retained policy NRM6 of the South East Plan. These sites should be allowed to come forward as a minimum to meet the needs identified in our representations.

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?

10 The representations to the draft Local Plan detailed our concerns regarding the overly optimistic delivery assumptions for the new settlement. Although this Local Plan will be examined against the 2012 edition of the NPPF (pursuant to paragraph 214 of the revised July 2018 version), any subsequent Plan will be assessed against the latest version. Paragraph 33 of the revised NPPF indicates that "**policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years.**" Consequently, due to the overly optimistic delivery assumptions for the new settlement,

together with our response on question 4.12, it is considered that the area of search should be omitted from this plan. The suitability of locations for growth within the district should be re-appraised through a review of the Local Plan, as required by paragraph 33 of the revised NPPF.

- 11 Alternatively, due to the significant shortfall in the Council's current sources of supply to address the housing quantum and plan period we advocate (see response to question 5.13), this would support the identification of a new settlement. However, in order to address the shortfall in five year supply (identified in our response to question 5.12), smaller sites such as our clients land west of Varndell Road and Owens Farm, Hook should be allocated. This is because such sites are deliverable and consequently contribute towards addressing our identified shortfall in five years housing supply.

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