

HART LOCAL PLAN STRATEGY AND SITES 2016-32 EXAMINATION
HEARING STATEMENT - MATTER 5 HOUSING
TRAJECTORY, DELIVERABILITY AND HOUSING LAND SUPPLY

On behalf of:
Wilbur Developments Ltd

Respondent ID: 124

Date:
October 2018

Reference:
LR/06014/LP Examination Matter 5

1.0 Introduction

- 1.1 This statement is prepared on behalf of Wilbur Developments Ltd in relation to **Matter 5: Housing – Trajectory, Deliverability and Housing Land Supply** and provides their response to **Question 5.10** of the Inspector’s questions, which asks whether there is *sufficient flexibility in the identified housing supply to adapt to rapid change, as set out in paragraph 14 of the NPPF, 2012?*

2.0 Flexibility in Identified Supply

- 2.1 The statement prepared in relation to Matter 3 sets out Wilbur Developments Ltd’s position in relation to the soundness of the proposed housing requirement. For the reasons set out in that statement, the proposed requirement falls well below that which is sound and should be increased. It is suggested that an approach consistent with that proposed by the Regulation 18 Plan and informed by the Affordable Housing Background Paper would be an appropriate response i.e. increase from 6,208 dwellings to circa 7,760 dwellings. To the extent that the housing requirement falls below that which is sound, additional housing will be needed both to meet any increased requirement, as well as provide flexibility.
- 2.2 Even if the Inspector were to find the housing requirement proposed by the draft Plan to be sound (which we do not consider to be the case), Wilbur Developments Ltd remain of the view that the Plan needs to plan for additional housing over and above the planned supply to provide adequate flexibility. As drafted, the Plan is predicated on the unrealistic assumption that all sites with planning permission or any other components of the supply will come forward and be implemented strictly in accord with the trajectory. Given the inevitable changes in the market over the plan period, delays commonly experienced in the delivery of sites and dependency on the delivery of a new settlement at Hartland Village, this is unrealistic and provides insufficient flexibility to ensure the housing requirement will be delivered and that the Plan boosts the supply of housing and is able to respond to changes over the period to 2032, including the District’s widening gap in affordability. For the reasons set out in relation to Matter 1 and compellingly explained in the Affordable Housing Background Paper, which forms an important element of the Plan’s evidence base, the need to respond proactively to the widening affordability gap in the district, as well as addressing its affordable housing needs, is justification enough to build in greater flexibility in supply.
- 2.3 An area of search for a new settlement is identified in the Plan, its intended purpose being to meet future growth and by implication provide flexibility. The new settlement is not however an appropriate vehicle to either meet an increased housing requirement or to provide flexibility as part of the current plan strategy. This is on two counts: a) while a new settlement would provide the means to deliver a significant amount of housing in one location, it is for exactly this reason neither a flexible nor quick response to changing circumstances, and b) for the reasons set out in relation to Matter 1, it is based on an unjustified rationale and shrouded in inherent uncertainty.

- 2.4 For the reasons set out in relation to Matter 1, there are significant flaws in the process of sustainability appraisal undertaken to confirm the Plan's formulation. Central to those flaws is the inconsistent and irrational approach adopted toward the assessment of the new settlement option relative to the other reasonable alternatives, which artificially inflates the performance of what can at best be described as a 'concept' and downplays the merits of other deliverable options. The new settlement is entirely uncertain, as is a strategy that focuses on it. The fact that it is dependent upon the preparation and adoption of a future development plan document to test it and enable it to come forward (towards the end of the plan period) shrouds the proposal in uncertainty and fudges the issue of site allocation.
- 2.5 New settlements are, by nature, slow and cumbersome. They bring with them benefits associated with critical mass but cannot provide a quick or flexible response to change. The representations made by Wilbur Developments Ltd to the Regulation 19 Plan referenced the Welbourne example where more than 7 years on from the adoption of Fareham Borough's Core Strategy and 3 years on from the adoption of the Welbourne DPD, the new settlement has yet to deliver any new homes. The considerable lag from inception to the delivery of large scale development is the subject of *'Start to Finish: How Quickly do large-scale Housing Sites Deliver?'*. This recognises that large-scale sites can be an attractive proposition for plan makers, but they are not a "silver bullet" so far as their scale, complexity and (in some cases) up front infrastructure costs means they are not always easy to kick-start. And once up and running, there is a need to be realistic about how quickly they deliver homes - past decades have seen too many large-scale developments failing to deliver as quickly as expected, and gaps in housing land supply have opened up as a result¹. To avoid this, not only must the assumptions plans make about how quickly sites deliver be realistic and justified, but also allocate more sites rather than less that can support a good mix of types and sizes to ensure supply is maintained throughout the plan period.
- 2.6 In order to be sound, in particular justified and effective, the increased requirement and/or necessary degree of flexibility should be provided by the allocation of additional sites, which have a greater certainty of delivery. Extensions to existing settlements, such as that being promoted by Wilbur Developments Ltd at West of Hook, are an effective way in which such flexibility could be built into the Plan and ensure the maintenance of a rolling programme of housing delivery. Opportunities for settlement extensions have been identified (West of Hook and Pale Lane) and were assessed as part of the sustainability appraisal process. Notwithstanding our concerns regarding the soundness of that process, it did show the extensions to perform well. As sites the subject of planning applications and now appeals they have, unlike the new settlement AoS, been the subject of robust testing. Given the relative lack of constraint associated with them, it is fair to assume that had the Plan adopted an alternative strategy, these sites would now benefit from planning permissions and be ready to deliver.

¹ Page 1, Executive Summary, Start to Finish: How quickly do large-scale Housing Sites Deliver, Nathaniel Lichfield & Partners, November 2016

3.0 Proposed Changes

- 3.1 The new settlement AoS should be removed from the Plan and additional sites, such as Wilbur Developments Ltd's land West of Hook, should be allocated to enable the delivery of an increased housing requirement, as well as provide flexibility.