
EXAMINATION STATEMENT – MATTER 5

Hart Local Plan: Strategy and Sites 2016-2032

Representations on behalf of
Gallagher Estates and Barratt Homes

October 2018

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HART LOCAL PLAN:
STRATEGY AND SITES 2016-2032
REPRESENTATIONS ON BEHALF OF
GALLAGHER ESTATES AND BARRATT HOMES
OCTOBER 2018

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1.0 INTRODUCTION

- 1.1 This Statement has been prepared by Barton Willmore LLP on behalf of Gallagher Estates and Barratt Homes, who have land interests at Winchfield which forms part of the “Area of Search” (AoS) for a new settlement under emerging Policy SS3.
- 1.2 Representations have been made on behalf of our Clients throughout the production of the emerging Local Plan. As the “area of search” also covers land at Murrell Green which is promoted by Lightwood Land, this Statement has been prepared in consultation with Lightwood Land as part of the on-going collaborative approach.
- 1.3 Notwithstanding our Clients’ land interests, these representations have been prepared in recognition of prevailing planning policy and guidance, in particular the National Planning Policy Framework 2012 (NPPF) and Planning Practice Guidance (PPG) that relates to the 2012 NPPF.
- 1.4 These representations respond to the Inspector’s questions within Matter 5 and have been considered in the context of the tests of ‘Soundness’ as set out at Para 182 of the NPPF 2012, which requires that a Plan is:
- **Positively Prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where reasonable;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternative, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
 - **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

2.0 RESPONSE TO QUESTIONS

QUESTION 5.1 - Are the projected commitments in the Housing Trajectory based on a realistic and robust assessment of the likely timing of delivery?

- 2.1 We consider that the Council has undertaken a thorough assessment of the delivery of various sources of supply. However, the cumulative nature of the assumptions results in a significant step change in delivery to what has been achieved in the district before. This is why we consider the Council's approach to plan proactively to bring forward further supply in the middle of the plan period to be justified and consistent with national policy. In particular, paragraph 14 of the NPPF requires Local Plans to have sufficient flexibility to respond to rapid change, which is what introducing additional supply in the middle of the plan period through the new settlement achieves. This will ensure that the Plan delivers the significant boost in housing supply that it intends.

QUESTION 5.2 - Is the anticipated delivery from Hartland Village for each year in the Plan period realistic?

- 2.2 Yes. We consider that the anticipated delivery is realistic based on the information available today. However, given the complexities of the site unforeseen circumstances may arise over time but we acknowledge these could not realistically be factored in at this point in time. It is therefore important to have contingency in the trajectory, which the Council is securing through the new settlement and other commitments.

QUESTION 5.3 - Is the projected delivery from the Odiham and North Warnborough Neighbourhood Plan site allocations realistic?

- 2.3 We do not have any specific comments to make about these sites. We would however reiterate our points made in response to question 5.1 that any uncertainties that do exist will be mitigated in terms of impact of under delivery by the additional supply that will come forward from the new settlement in the middle of the plan period.

QUESTION 5.10 Is there sufficient flexibility in the identified housing supply to adapt to rapid change, as set out in Paragraph 14 of the NPPF, 2012?

- 2.4 Yes, the Local Plan as proposed with the Area of Search for a new settlement in place has sufficient flexibility to adapt to rapid change. This is a fundamental part of why it is needed. It is clear that there are a number of factors that the plan needs to be resilient to. For

example, unmet housing needs that are anticipated to arise over the plan period from neighbouring authorities, addressing affordable housing pressures in the district, and bolstering supply from the middle of the plan period where it is already expected to decrease significantly. In addition, as set out above the allocation at Hartland Village relates to a complex site and if unforeseen circumstances arise that delay delivery at this site, the supply from the new settlement can ensure a plan led system is maintained.

- 2.5 However, the answer to this question would clearly be no without the Area of Search for the New Settlement in place. Without the supply from the new settlement in the middle of the plan period there would be very limited contingency to deal with any of the above issues or circumstances. 500 homes above a minimum requirement would not be sufficient as evidence by the housing trajectory that shows supply falling away from the middle of the plan period.

QUESTION 5.13 On a related matter and having regard to the housing trajectory, what are the implications of the new Housing Delivery Test, particularly towards the end of the Plan period?

- 2.6 With the new settlement delivering from the middle of the plan period it is clear that the plan supply will be robust and that the delivery of homes would remain higher than requirement across the plan period.
- 2.7 The Council's published trajectory only includes allocations being made within the Local Plan and does not include the supply from the new settlement. This trajectory clearly shows that without the new settlement the Council would not be delivering enough homes to meet the annual requirement from the middle of the plan period.
- 2.8 All of the supply contained within the housing trajectory has planning permission and is predominantly to be delivered by the middle of the plan period, with delivery reducing significantly from 2023 with completions falling under the annual requirement from 2025¹. Therefore, the projected delivery is anticipated to be significantly below the identified need per year. So, even with no slippage to any of the forecasts in this trajectory, housing delivery will not keep pace with the annual requirement. Therefore, without the supply from the new settlement, the Council would trigger the presumption in favour of sustainable development through the Housing Delivery Test from the middle of the plan period.

¹ Hart District Council Housing Land Supply Paper, April 2018 (published in June 2018)

- 2.9 This once again highlights that the Council' s approach to identify a broad location for a new settlement now to ensure supply can be bolstered from the middle of the plan period is justified, will ensure that the plan is effective and maintain a plan led system as required by national policy.