
Hart District Public Examination of the Local Plan: Strategy and Sites (2016 – 2032) (the Plan)

Response to Inspector's Matters and Issues
On behalf of Martin Grant Homes
Respondent Number 253

Matter 5
Housing: Trajectory, Deliverability and Housing Land Supply

October 2018

**Hart District Public Examination
of the
Local Plan: Strategy and Sites (2016 – 2032) (the Plan)**

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Matter 5:**

Housing: Trajectory, Deliverability and Housing Land Supply

**Barton Willmore LLP on behalf of Martin Grant Homes
Respondent Number 253**

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Prepared by:	Jonathan Locke
Checked by:	Nick Paterson-Neild

Barton Willmore
The Blade
Abbey Square
Reading
Berkshire. RG1 3BE

Tel: 0118 943 0000
Fax: 0118 943 0001
Email: planning@bartonwillmore.co.uk

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0.0 INTRODUCTION

- 0.1 Barton Willmore LLP is instructed by Martin Grant Homes (“MGH”) to submit this written Hearing Statement (“HS”) in response to the Inspector’s Matters and Issues for Examination. These representations expand upon the representations submitted on behalf of the MGH in response to the relevant Regulation 18 and Regulation 19 consultations on the emerging Hart District Local Plan.

- 0.2 This statement does not respond to all questions raised under Matter 5, but focuses on those of particular relevance to the interests of the MGH. Whilst efforts are made not to duplicate the content of previous representations, this HS draws on previous responses where necessary.

RESPONSE TO INSPECTOR'S QUESTIONS – Matter 5

Matter 5: Housing: Trajectory, Deliverability and Housing Land Supply

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

5.1.1 No comment.

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

5.2.1 No comment.

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

5.3.1 No comment.

5.4 Are the projected completions in the Housing Trajectory based on a sound assessment of infrastructure requirements?

5.4.1 No comment.

5.5 Is there sufficient Suitable Alternative Natural Greenspace (SANG) capacity to support the level of housing proposed, including windfall sites?

5.5.1 There must be concern with regard to the deliverability of windfall sites and other small sites or prior approvals in terms of their ability to be supported by SANG. The Council acknowledges that 327 dwellings with prior approval do not have an agreed SANG (page 144 of the draft Plan).

5.6 Is the anticipated contribution to housing delivery from windfall development justified?

5.6.1 No comment.

5.7 Are the delivery assumptions for sites within settlement boundaries robust?

5.7.1 No comment.

5.8 Should an allowance from rural exception sites be included in the Trajectory?

5.8.1 No comment.

5.9 Should any lapse rates be included in the Housing Trajectory?

5.9.1 No comment.

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?

5.10.1 No, there is high dependence on one site. As detailed in our statement to Matter 4, Fleet and Church Crookham are designated as a Tier 1 settlement, the most sustainable urban area of the District. Despite this status, other than Hartland Village (Draft Policy SS2) which is a development of a brownfield site, there are no residential allocations proposed around the settlement despite there being sustainable reasonable alternatives, such as Land West of Ewshot Lane, Church Crookham, which have not been fully considered within the Sustainability Appraisal (see our hearing statement to Matter 1).

5.10.2 In addition, due to concerns in respect of the need for a 15 year plan period from adoption, the need to consider unmet need from neighbouring Surrey Heath (as identified in our hearing statement to Matter 3), MGH is concerned that the Council would not meet full housing needs for market and affordable housing in the housing market area for a period of 15 years from adoption in 2019 and as required by paragraph 157 of the NPPF (i.e. to 2034), (this alone means that the Local Plan does not allocate as much housing as it should and based on the OAN used by the submission Local Plan (388dpa) and would result in a need for an additional 776 dwellings) would not therefore plan positively for the development and infrastructure required in the area.

5.10.3 We are concerned that the Draft Plan fails to allocate residential development at Fleet (including Church Crookham), save in respect of Hartland Village, which as the largest settlement in the District, has been designated a main town (Tier 1) settlement within the settlement hierarchy. Accordingly, there is insufficient flexibility in the identified housing supply to adapt to rapid change.

Housing Land Supply

5.11 Is the use of 5% buffer justified? Has there been a record of persistent under delivery?

5.11.1 No a 5% buffer is not justified. A 20% buffer should be applied as in seven out of the last ten years the Council has failed to achieve its housing requirement. In aggregate the Council delivered a total of 2,787 homes against a requirement of 3,042 in the period 2007-17 (a deficit of 255 homes). This is considered to represent a record of persistent under delivery.

5.12 Will there be a 5-year housing land supply on adoption of the Plan?

5.12.1 No comment.

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?

5.13.1 No comment.