



Matter 5 Housing Trajectory, deliverability and housing land supply
Claremont Planning for EPV N Hants
Representor No. 164

MATTER 5 EXAMINATION STATEMENT

**EUROPEAN PROPERTY VENTURES
(NORTH HANTS)**

REPRESENTOR 164

**HOUSING TRAJECTORY, DELIVERABILITY AND
HOUSING LAND SUPPLY**



This Statement for Matter 5 will seek to address the Inspector's Questions identified below:

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

Please note: the Council has suggested changes to Appendix 2 (Housing Numbers and Trajectory) of the Plan within Core Document CD11 (Version 2), dated 10 August 2018.

2. Is the anticipated delivery from Hartland Village for each year in the Plan period realistic?
3. Is the projected delivery from the Odiham and North Warnborough Neighbourhood Plan site allocations realistic?
4. Are the projected completions in the Housing Trajectory based on a sound assessment of infrastructure requirements?
5. Is there sufficient Suitable Alternative Natural Greenspace (SANG) capacity to support the level of housing proposed, including windfall sites?
6. Is the anticipated contribution to housing delivery from windfall development justified?
7. Are the delivery assumptions for sites within settlement boundaries robust?
8. Should an allowance from rural exception sites be included in the Trajectory?
9. Should any lapse rates be included in the Housing Trajectory?
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?

Housing land supply

11. Is the use of a 5% buffer justified? Has there been a record of persistent under delivery?
12. Will there be a 5 year housing land supply on adoption of the Plan?
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?



Matter 5 – Housing: Trajectory, deliverability and housing land supply

14. Claremont Planning Consultancy Ltd previously provided responses to the Council's emerging Local Plan on behalf of European Property (North Hampshire) Ltd (EPV) to seek to boost housing requirements and recognise the need to ensure housing delivery within the district of Hart.
15. On behalf of EPV, Claremont Planning wishes to draw to the Inspector's attention matters that lead us to conclude that the emerging plan and its strategic approach to delivering development is unsound and fails to comply with the duty co-operate. The failure of the plan to distribute development in accordance with the advice of NPPF and the documented evidence base means that the resulting plan is ineffective and fails to meet the test for legal compliance. Through these representations the failings of the proposed strategic approach will be identified, specifically in respect of the over-reliance upon approved windfall developments and large strategic growth proposals to deliver a consistent level of development delivery over the life of the plan period.
16. The Housing Trajectory of the Plan is underpinned by the delivery of two large strategic sites identified at Hartland village and Murrell Green/Winchfield as well as the realisation of allocated sites through Neighbourhood Plans and windfall development. This over-reliance on two allocations is not a realistic or appropriate approach given the risks that are entailed in the development of large-scale strategic sites with a multitude of factors that can delay, limit or ultimately prevent a strategic site from coming forward. Whilst Neighbourhood Plans can be well suited to deliver sites to meet localised housing need, they cannot provide strategically significant development in the context of the Local Plan. As such, they cannot provide substantial delivery of housing numbers to address a strategic need without a lead from the Local Plan. Windfall development is not guaranteed and whilst can make a positive contribution to the delivery of housing numbers, this mechanism in itself cannot be regarded as a fundamental or dependable component of the development strategy. Subsequently, the Housing Trajectory of the emerging Local Plan is inappropriate where it relies unsuitably on the delivery of a few, large sites and obtusely depends on the development of Neighbourhood Plan allocations which should be accounted for as a part of the wider strategic identified need.
17. To ensure that the identified need within the Local Plan can be met through the management of development within the District, the delivery of sites, whilst not guaranteed, must be practically assured so that a robust Housing Trajectory can be maintained. However, as the Plan unjustifiably attributes dependence on the delivery of large strategic sites in the District rather than a varied number of sites of differing scales, the LPA has inappropriately emphasised the development strategy of the Plan towards the realisation of larger sites. This is not an effective approach and will invariably result in a detrimental impact on housing land supply position of the LPA as the Plan period progresses. This approach is also considered to be contrary to the NPPF, specifically paragraph 68 that advises medium sized allocations can make an important contribution to meeting housing requirements, particularly in relation to ensuring delivery within appropriate time periods. Given Hart DC's failure to maintain adequate housing delivery and ensure an appropriate development strategy is in place, it is considered essential that the future strategy of the District take into account the LPA's failure to ensure a delivery rate is maintained and void over-reliance upon windfall sites and planning by appeal.



18. The Local Plan proposes a lower number of homes to be delivered to 2032 than that identified as the evidenced OAN, however, it is stated that future requirements will be higher and that a new settlement will be necessary and will be delivered within the plan period through a separate DPD. The Council are therefore acknowledging that more houses are required than they are planning for and that the current strategy fails to address current, future or cross-boundary needs appropriately. There are no definitive plans for this New Settlement proposal or how such a scale of development should be located in respect of infrastructure constraints, highway capacity, environmental restrictions and developable areas; but yet the proposed plan has deleted a highly sustainable draft allocation for at least 100 dwellings at Yateley. The deletion of this potential allocation site at Eversley Road is a reflection of the Plan's unsound strategy to rely on an unjustified development approach whereby windfall sites will take precedence before a new settlement is proposed. The unset time period and delivery mechanisms of the new settlement fail to account for the aspirations of the Housing Trajectory and thus will result in a material impact on the housing land position and deliverable housing numbers of the Local Plan.
19. It is the view of Claremont Planning that the figures suggested in the HMA are at most modest but should be considered as unjustified suppression of housing delivery with Hart District. The future proposals for a new settlement are considered to undermine the findings of this evidence document and contradict the advice of the NPPF. Given that the LPA will be seeking to prepare a separate development plan document at some point in the future to enable delivery of the new settlement, there is no reliable, defensible or appropriate framework to move forward with following the adoption of the emerging Local Plan. Without assurance of delivery, which relies upon the preparation of a DPD, identification of the search area and further evidence base to guide the development of the new settlement, the Housing Trajectory cannot be fully relied upon to ensure a satisfactory housing land position, without risking detrimental consequences on control of development within the District.
20. The LPA should seek for the new Local Plan to provide a flexible array of site allocations to meet the 7 to 10 year housing needs and provide a dependable housing land supply that would also be bolstered by windfall site delivery across the District to meet a more realistic quantum of housing development. We therefore suggest that the SC5 site at Eversley Road is reinstated to assist in accommodating future housing needs and it is ideally located immediately adjacent to the settlement's western boundary.
21. On behalf of European Property Ventures North Hampshire (EPV), Claremont Planning identifies that the emerging plan and its strategic approach to delivering development is unsound and fails to comply with the duty co-operate. The failure of the plan to distribute development in accordance with the advice of the National Planning Policy Framework and the documented evidence base means that the resulting plan is ineffective and fails to meet the test for legal compliance. The previous draft allocation SC5 should be reinstated with the adjacent Eversley gap identified as a search area for the provision of strategic SANG.
22. The SC5 site was previously a draft allocation in the regulation 18 consultation and was therefore previously considered suitable for development. A series of consultant reports were prepared supporting development at this location. The development would result in a logical expansion to the town to the west, the only area that can accommodate growth due to the restrictions caused by flooding and TBHSPA at all other locations. It is unjustified to remove this site from the draft allocations when the Local Plan is suggesting a restricted number of new



homes across the plan period and also not seeking to address the SANG deficit across the whole District for the lifetime of the plan. The Local Plan proposes too low a number of homes to be delivered to 2032 at existing settlements, instead recognising that future requirements will be of a much higher level sufficient to justify a new settlement. The Council are therefore acknowledging that more houses are required than they suggest but they have no definitive plans for this New Settlement and yet they have deleted a highly sustainable draft allocation for a minimum of 100 dwellings at Yateley.

23. The site at Eversley Road, Yateley is an example of a site that could form part of a more appropriate development strategy that provides a more robust and ensured delivery of sites that can maintain a satisfactory Housing Trajectory that is in line with the requirements of National Policy. Over reliance on the delivery of local sites as allocated through Neighbourhood Plans, windfalls, existing commitments and the provision of two strategic sites does not provide a robust strategy that is underpinned by sites that span a variety of types or scales. This approach provides greater flexibility to ensure that any factors that limit development, such as market forces beyond the LPA's control, can be overcome by turning to alternative sites that may possibly be less constrained by such variables. By including the site at Eversley Road, the LPA is able to secure a highly deliverable and suitable site at a sustainable location that can take advantage of its location at the edge of the second largest settlement within the District.
24. Claremont Planning have demonstrated that the plan cannot be found effective, sound or legally compliant without further modification given the inadequacies surrounding the identification of strategic growth locations.

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