



Gladman Developments Ltd

Examination of the Hart Local Plan 2016 - 2032

Matter 5 – Housing: trajectory, deliverability and

housing land supply

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

Gladman has concerns that the Council has insufficient SANG capacity available to it to support housing growth and in particular to accommodate any windfall sites. In September 2018, the Council prepared an Annual Assessment of SANG capacity in the District¹. This notes that at present, although there is spare capacity, much of this is in private hands and the Council could only access this subject to the owner's permission. It also finds that there is no capacity left at:

- Clarks Farm/Swan Lakes Yateley
- Dilly Lane/Queen Elizabeth II Fields, Hartley Wintney
- Hitches Lane/Edenbrook
- Hawley Meadows.

For those SANG's that will be coming on line in the future; in many instances that Council has no timescale for when SANG will be available and in some instances, even once available capacity will be immediately used up by the development the SANG is associated with. The report notes that three bespoke SANGs will also be coming online at High Ridge Farm, Hartland Park and Riseley; however these will remain in private hands as they are designed to meet the needs of associated development proposals.

With this in mind, and the strict regulatory approach the Council to sites in order for them to access SANG, Gladman is unclear how the Plan would enable windfall sites to come forward.

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

As the local plan requirement is made up largely of extant planning permissions Gladman would suggest that a lapse rate should apply. In this regard, Gladman would wish to highlight the presentation given by the Director of Planning at DCLG at the Home Builders Federation Planning Conference in 2015. Figure 1 below shows that 10-20% of permissions do not materialise into a start on site and that the permission 'drops out'. It provides multiple reasons for this occurring and highlights a clear need to plan for the granting of permissions on more units than are required to be completed to meet housing needs. In this regard, it is

¹ Annual Assessment of Availability of suitable alternative natural green space (sang) 18th September 2018, Overview and Scrutiny Report

recommended that the allocations within the Plan provide a clear contingency in order to increase the prospect of the minimum requirement being achieved over the plan period.

Figure 1 – Home Builders Federation Slide:-



Gladman would also highlight the findings in the Inspector's report into the Stratford-on-Avon Core Strategy, published in June 2016. In that Report, at paragraph 71, the Inspector finds that to ensure the plan is positively prepared in line with the NPPF, the 10% reserve for housing sites should be increased to 20%. Similarly, the recently examined plan for Redcar and Cleveland identifies a buffer well in excess of 20%.

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?

Gladman do not consider the current housing supply as set out in Table 1 will provide enough flexibility to ensure that the minimum OAN will be delivered. We do not consider that the current flexibility of 136 dwellings over the minimum housing requirement to be sufficient. This amounts to around a 2% flexibility, which when considering that the current housing supply is reliant on the implementation of existing planning permissions and the new village at Hartland, is not considered sufficient. A resilience factor of 20% is considered much more appropriate to account for any slippage of existing planning permissions, as not all permissions will be implemented.

This would require the allocation of additional sites which would provide the opportunity to rectify the issues we consider with the spatial strategy.