

# **HART DISTRICT LOCAL PLAN: STRATEGY AND SITES (2016-2032)**

## **HEARING STATEMENT**

### **MATTER 5: HOUSING – TRAJECTORY, DELIVERABILITY AND HOUSING LAND SUPPLY**

**ON BEHALF OF LIGHTWOOD LAND**

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004**

**Prepared by:** Alexander James Bullock

## **Pegasus Group**

First Floor | South Wing | Equinox North | Great Park Road | Almondsbury | Bristol | BS32 4QL

**T** 01454 625945 | **F** 01454 618074 | **W** [www.pegasuspg.co.uk](http://www.pegasuspg.co.uk)

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## CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	HEARING STATEMENT	2

## 1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Pegasus Group on behalf of Lightwood Land in respect of the Hart District Local Plan: Strategy and Sites (2016-2032). This Statement seeks to respond to the questions raised by Mr Jonathan Manning (Inspector) in relation to Matter 5: Housing – trajectory, deliverability and housing land supply.
- 1.2 Lightwood has a major contractual interest in the identified Area of Search (AoS) for a new settlement at Murrell Green/Winchfield that is identified as part of Hart District Council’s (the Council’s) Vision and Objectives and under Policies SS1 and SS3.
- 1.3 Pegasus Group, acting on behalf of their client, have made representations on the emerging Local Plan at the Regulation 18 and 19 stages. Our responses to the questions and issues raised should be read in conjunction with these representations and the associated evidence base for the AoS.
- 1.4 These representations have been considered against the tests of ‘Soundness’ as defined by Paragraph 182<sup>1</sup> of the National Planning Policy Framework (NPPF) 2012.
- 1.5 This Hearing Statement has been prepared in consultation with Gallagher Estates, the promoter of the Winchfield component of the AoS, as part of the on-going collaborative approach to the promotion and delivery of the future new settlement.
- 1.6 Pegasus, on behalf of Lightwood, wish to take a full and active part in the hearing session on **Tuesday 11<sup>th</sup> December 2018** in relation to all parts of Matter 5. Our responses to the questions and issues raised our set out within the remainder of this Statement.

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<sup>1</sup> Previously Paragraph 35 of NPPF 2018

## 2. HEARING STATEMENT

2.1 Within this section of the Statement we identify the relevant question/matter and provide our response within the subsequent paragraphs. All references are consistent with those provided in the 14<sup>th</sup> September 2018 set of questions.

### ***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?***

2.2 Yes, there is sufficient flexibility provided within the identified supply if the supply contains the AoS. Paragraph 4.5 of the Housing Numbers and Spatial Strategy Topic Paper (TOP1) identifies that although not shown in the trajectory the Council is *"aiming to see new homes delivered from (the new settlement) midway through the plan period which would coincide with the frontloaded trajectory 'tailing off'"*.

2.3 Without the identification of the AoS in this Plan, Lightwood considers that there would be insufficient flexibility.

2.4 Lightwood consider that there is an over reliance on sites being delivered at the start of the plan period which, if they build out as expected, makes the Council both vulnerable to any significant change in requirement (under the outcome of future standard methodology) and in relation to the requirements of the Housing Delivery Test, as discussed further below.

2.5 However, the Council's identification of the Murrell Green/Winchfield Area of Search (AoS) does provide a degree of flexibility as it would form an alternative source of housing which is expected to come online during the middle of the Plan period following the DPD and subsequent application processes.

2.6 Whilst some objectors have criticised the Council as being overly reliant on the large allocation of Hartland Village, we disagree as the trajectory for this site is much longer.

2.7 The Council's trajectory is satisfactory against the annual requirement of 382 per annum. However, without the AoS it is highly vulnerable to any significant uplift in requirement. It is therefore crucial for the AoS to be allocated now.

**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?**

- 2.8 Lightwood consider there are some fundamental and significant problems for the Council during the latter part of the Local Plan period resulting from the Housing Delivery Test.
- 2.9 Annex 2 of the NPPF defines the Housing Delivery Test as:
- “Measures net additional dwellings provided in a local authority area against the homes required, using national statistics and local authority data. The Secretary of State will publish the Housing Delivery Test results for each local authority in England every November.”*
- 2.10 In effect, the test seeks to ensure that delivery rates are consistent and in line with adopted requirements and measures delivery on a rolling three year basis.
- 2.11 As per Figure 1 in the Councils Housing Numbers and Spatial Strategy Topic Paper (TOP1), the Council falls below the annual requirement post 2024/25 and in all remaining years of the plan period.
- 2.12 As a result, by 2027/28, the Housing Delivery Test outcome (based on the Council’s assumed delivery of 850 of 1,200) would slip to 70% irrespective of any previous over supply. Such a result would automatically trigger the presumption in favour of sustainable development as it would be post 2021.
- 2.13 This automatic trigger of the ‘tilted balance’ would place the Council in a very vulnerable position to speculative planning applications. Such a situation would ensure the Council could no longer operate in a plan led way and would result in the Council failing to meet their 1<sup>st</sup> strategic objective as set out within the Local Plan (CD1).
- 2.14 As we have highlighted in our response to Matter 4, the solution to this issue is to take positive decisions now through the identification of the AoS. This would start to deliver dwellings during this crucial mid-later Plan Period.

2.15 However, this support to address this issue would only be possible if the AoS is identified now which would allow the subsequent steps of the DPD, planning applications and discharge of conditions to have been completed so that units are then capable of delivery. A delay now, to local plan review, would remove this capability.