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BY EMAIL & POST: planningpolicy@hart.gov.uk

14th January, 2016

Dear Sir/Madam,

HART DISTRICT LOCAL PLAN 2011-2032
REFINED OPTIONS FOR DELIVERING NEW HOMES AND VISION & STRATEGIC PRIORITIES
REPRESENTATIONS ON BEHALF OF MARTIN GRANT HOMES

We write on behalf of our client, Martin Grant Homes, in response to the above consultation which seeks the views of interested parties on Hart District Local Plan 2011-2031 - Refined Housing Options and Vision & Strategic Priorities. Martin Grant Homes has land interests within the Hart district including Land west of Ewshot Lane, Church Crookham ('the Site').

This representation responds to the questions in orders set out in the Vision & Strategic Priorities and the Refined Options for Delivering New Homes ('the Refined Options').

VISION & STRATEGIC PRIORITIES

Q1: We have identified a set of Key Issues for the Local Plan identified in Table 1. Do you agree with them Yes or No? Do you have any comments?

Q2: We have drafted a Vision setting out how the District might look by 2032? To what extent do you agree with it? Please give us any comments.

Q3: We have identified some draft Strategic Priorities for the Local Plan in Table 2? Do you agree with them Yes or No? Do you have any comments?

In response to Questions 1, 2 and 3, we in broad do not raise an objection but we consider that the wording needs to be rephrased for the issues and visions regarding housing needs to reflect national policy. The details are shown below:

- Issue 1 - The need to make provision for the new homes needed in the area.
- Second paragraph of Vision - Hart will have played its role in meeting the development needs of its housing market and functional economic area. This includes meeting the need for affordable housing, accommodation for the elderly, and other forms of specialist housing (1, 2, 3).



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- Strategic Priority 1 - To deliver all the objectively assessed housing need for Hart in planned locations across the District between 2011 and 2032.

National Planning Policy Framework ('NPPF') states that:

To boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period (paragraph 47).

Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals (paragraph 158).

As highlighted in NPPF, local plans should meet full, objectively assessed needs for market and affordable housing, and should take full account of demographic trend, change in job numbers, market signals and affordable housing needs. Therefore, to be in line with NPPF, we consider that the wording of the Issue 1 and the second paragraph of the Vision should be made clearer by including '**the need to meet full, objectively assessed needs for market and affordable housing**'. Further, it is noted that Strategic Priority 1 emphasises 'the objectively assessed housing need', it is also important to make Vision and Issues consistent to the Strategic Priorities.

REFINED OPTIONS FOR DELIVERING NEW HOMES

Q1: Do you have any comments on how to meet the needs of specialist groups such as affordable and Starter Homes, Custom or self-build homes, specialist homes for older people, and sites for the Travelling Community.

No comment.

Q2: Where are the sites within Hart District that you think may be appropriate for affordable and Starter Homes?

With regards to affordable housing, all suitable sites should contribute affordable housing. Affordability in the District has deteriorated since 2001 and the house price to income ratio is currently one of the highest in the country (10.7 compared with the national average of 6.5). The number of dwellings required to accommodate affordable need in full, assuming that all new affordable housing is delivered at the current policy rate of 40%, equals 800 dwellings per annum. Therefore we consider that the current housing target should be significantly higher (details set out in Section of Response to Objectively Assessed Needs) to meet a significant amount of the affordable need for the District, as well as demographic and economic needs.

Q3: Do you agree with the current Settlement Hierarchy?

We agree that Fleet (including Church Crookham and Elvetham Heath) as Tier 1 - Main Urban Area should be at the top of the hierarchy in terms of existing settlements given its size and range of facilities.

Q4: Of the three possible approaches that could deliver new homes in Hart, which one should we prioritise to deliver the majority of our housing needs?

- Approach 1 - Disperse
- Approach 2 - Strategic Urban Extension at main settlements
- Approach 3 - A new settlement at Winchfield

Q5: If we need to combine approaches, which combinations do you prefer?

- Approach 4 - Combine 1 and 2
- Approach 5 - Combine 2 and 3
- Approach 6 - Combine 3 and 1
- Approach 7 - Combine all three approaches

In response to Questions 4 and 5, the Refined Options identifies Hart's need for new homes of 7,500 dwellings between 2011 and 2032 which is equivalent to approximately 357 dwellings per annum (dpa). This housing figure is based on the SHMA prepared by Hart, Rushmoor and Surrey Heath in 2014.

The Refined Options further states that "the current SHMA will be updated early in 2016 but for the time being we propose to progress with the Local Plan based on the current information available. When we publish our draft Full Local Plan in summer 2016, it will reflect any updated SHMA figures and it will have been informed by the outcome of this current consultation. If the updated SHMA suggests that there should be a major change in how many new homes we should be delivering by 2032, we may carry out a complete review of the current position and revisit this current consultation paper".

The NPPF requires that, when providing OAN, local plan should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. The Planning Practice Guidance (PPG) sets out the methodology for OAN to take full account of demographic trend, change in job numbers, market signals and affordable housing needs.

The SHMA used for the current housing target is based on interim 2011-based household projection which is considered not reliable as it does not use Census 2011 and is underpinned by recessionary trends. Therefore, the current dwelling numbers proposed are based on an unsound position and should be significantly higher. Future Local Plan consultations should therefore have regard to the updated SHMA which the Council will be preparing in early 2016.

This representation provides a current view of the Full Objectively Assessed Need (OAN) for Hart District between 2011 and 2031. This represents an updated assessment from that undertaken in March 2015 and prepared in respect of an Appeal for Albany Park, Church Crookham. Equivalent figures relating to the Housing Market Area (HMA) have also been included to place the Hart District figures in their wider context.

The requirement for all Local Planning Authorities (LPAs) to base their housing targets on objective assessments of need is rooted in national planning policy - specifically the National Planning Policy Framework (NPPF) (March 2012) and the Planning Practice Guidance (PPG) (March 2014).

i) National Planning Policy Framework (NPPF) (March 2012)

Paragraph 47 of the NPPF confirms the need for local authorities to boost significantly the supply of housing. To do so, it states that local authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area.

Paragraph 159 states that for plan-making purposes, local planning authorities are required to clearly understand housing needs in their area. To do so they should prepare a Strategic Housing Market Assessment (SHMA) that identifies the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.

ii) Planning Practice Guidance (PPG) (March 2014)

Use of the PPG methodology for assessing housing need is strongly recommended, to ensure that the assessment is transparent (ID2a 005). The area assessed should be the housing market area (ID2a 008), reflecting the key functional linkages between places where people live and work (ID2a 010).

The methodology is set out at ID 2a 014 to 029 (overall housing need at ID2a 015 to 020), and is introduced as an assessment that should be based predominately on secondary data (ID2a 014).

Key steps in the methodology include:

- *Starting point estimate of need* - starting point for assessing overall housing need should be the household projections published by the Department for Communities and Local Government, but that they are trends based and may require adjustment to reflect factors, such as unmet or suppressed need, not captured in past trends.
- *Adjusting for demographic evidence* - plan makers may consider testing alternative assumptions in relation to the underlying demographic projections and household formation rates.
- *Adjusting for likely change in job numbers* - the methodology states that job trends and or forecasts should also be taken into account when assessing overall housing need. The implication is that housing numbers should be increased where this will enable labour force supply to match projected job growth (2a-018).
- *Adjusting for market signals* - this is a further test intended to inform whether the starting point estimate of overall housing need (the household projections) should be adjusted upwards.
- *Overall housing need* - can be summarised as a test of whether the household projection based starting point can be reconciled with a) the latest demographic evidence, b) the ability to accommodate projected job demand, c) the requirement to address worsening market signals. If it cannot be reconciled, then an adjustment should be made.
- *Affordable housing need assessment* - estimated by subtracting total available stock from total gross need.

The Hart, Rushmoor, and Surrey Heath SHMA was published by Wessex Economics in December 2014 and sought to establish OAN for the HMA. The SHMA's conclusion is that the full OAN for Hart District is 370 dwellings per annum (dpa) and for the HMA is 1,180 dpa. This compares to the 2012-based Household Projections which indicate a starting point of 250 dpa in Hart District.

However, Barton Willmore consider it necessary to make adjustments for the fact the 25-44 age group shows signs of suppressed household formation, and that net migration trends (observed over the 2012-based SNPP's trend period) are significantly below the 10 year average. Making these two adjustments increases demographic-led housing need to 400 dpa.

Such adjustments are necessary - firstly, in dealing with the suppressed household formation point, it is necessary to alleviate this suppression and meet NPPF requirements to plan positively for growth. Secondly, Hart District has been less affordable than the national, regional, and the HMA averages. Affordability in the District has deteriorated since 2001 and the affordability ratio is currently one of the highest in the country (10.7 versus national average of 6.5). As such, the adjustment that Barton Willmore apply for suppressed household formation rates also provides a response to the clear evidence of worsening affordability in Hart District.

It is forecast that an average of 620 jobs per annum will be created within the district over the plan period. The demographic-led housing need figure would supply capacity to support only 220 jobs per annum. Making an adjustment in line with PPG to support the relevant labour force increases the housing need to 730 dpa.

The Council's evidence base identified net affordable need of 320 dwellings per annum. The number of dwellings required to accommodate affordable need in full, assuming that all new affordable housing is delivered at the current policy rate of 40%, equals 800 dwellings per annum. The OAN of 730 dpa would therefore help to meet a significant amount of the affordable need for the District.

As noted above, affordability in Hart District has worsened significantly since 2001, and 71% of first time buyers are unable to afford to buy a lower quartile priced-house. The Jobs-led Modelled housing need (730 dpa) would make a significant contribution to improving this situation. However, as noted above, to meet the affordable need in full would require 800 dpa.

In summary, the Full Objectively Assessed Housing Need for Hart District between 2011 and 2031 is at least 730 dpa.

HMA for Hart, Rushmoor and Surrey Heath

In order to place Barton Willmore's derived OAN for Hart District Council in its wider context, the OAN for the HMA for Hart, Rushmoor and Surrey Heath has also been updated by Barton Willmore.

The 2012-based Household Projections indicate a starting point of 780 dwellings per annum (dpa). Making appropriate adjustments to take account of suppressed household formation rates (25-44 age group) and for migration trends increases the housing need to 1,180 dpa.

It is forecast that an average of 1,650 jobs per annum will be created within the HMA over the plan period. This average is drawn from the three leading forecasting houses; Experian, Oxford, and Cambridge Economics, and is significantly higher than the forecasts tested in the Council's SHMA. The demographic-led housing need figure would supply capacity to support only 620 jobs per annum. Making an adjustment for this increases housing need to 1,950 dpa in the HMA.

Summary

Barton Willmore's Full Objectively Assessed Need for Hart District between 2011 and 2031 is at least 730 dpa and for the HMA is 1,950 dpa. For both Hart District and the HMA, our figures are higher than those included in the Hart, Rushmoor, and Surrey Heath SHMA (December 2014) (370 dpa and 1,180, respectively) for the reasons set out above.

Further, on unmet need, the Council acknowledges that it may need to account for around 3,000 homes from neighbouring districts in addition to Hart's own needs: this is over and above the needs set out above.

Overall, the current housing target of 375dpa set out in the Refined Options is based on outdated evidence whilst the OAN of at least 730dpa advocated is based on the most up to date evidence, taking full account of demographic trends, change in job numbers, market signals and affordable housing needs. There is also acknowledged unmet housing needs from the wider housing market area outside of the District. Hart District Council is going to update its SHMA in 2016. Therefore, the current housing target is not based on current evidence, and the housing numbers should be significantly higher in the emerging Local Plan.

In seeking to address its housing needs, it is expected that the Council is likely to need extensions to sustainable settlements, a new settlement and strategic urban extensions which includes Ewshot Lane, Church Crookham which will enable the Council to address short term housing needs.

Q6: Do you have any comments on the sites in New Homes Sites Booklet?

We support the SHLAA shortlisted site 166 (Land west of Ewshot Lane). The Site should be promoted in the emerging Local Plan as it is situated in a sustainable location next to primary settlement urban area. An appeal was allowed for a planning application (14/01223/FUL) in 2014 for a proposal for 300 dwellings on Albany Park, Land west of Redfields Lane, Church Crookham. In the Inspector's report, it states that the appeal site (which lies west of Redfields Lane at the southern edge of Church Crookham - close to the land west of Ewshot Lane) provides a sustainable location for residential development, being on the edge of the main settlement boundary of Fleet and Church Crookham.

The site is located in an accessible location with a number of local day to day facilities within acceptable walking distance, as well as employment opportunities. Fleet town centre is well within acceptable cycling distance providing a wide range of facilities commensurate with its size. There is a regular bus service within the vicinity of the site, which provides connections to the centre of Fleet, the rail station and Farnborough.

In traffic impact terms it is considered that development traffic could be accommodated in an acceptable manner on the immediate road network. Initial capacity testing at the Ewshot Lane junction with Aldershot Road/Redfield's Lane, has shown that the development can be accommodated without a detrimental impact on capacity. On the wider network the increases are not at a level which are likely to have an unacceptable impact.

The site is located close to a number of local facilities and the recent appeal decision at Albany Park confirms that development in this area is generally considered sustainable in transport terms.

Vehicular access can be achieved from Ewshot Lane at the northern end of the site. The footway on Ewshot Lane is understood to be extended to provide a connection to the QEB site (opposite the entrance to the tennis club access). A simple priority access junction can be delivered to serve the site (to include widening within the existing highway boundary (to 5.5m) and provision of a footway along a short section of Ewshot Lane). This can be achieved by retaining priority to Ewshot Lane or alternatively a change of priority directly into the site in the north east corner. Alternatively access could be achieved from Redfields Industrial Estate to the west.

The site has a number of urbanising influences. These include Redfields Garden Centre; the tennis club to the west of Ewshot Lane; housing to the rear of Rose Cottages; existing housing at Humphrey Park to the northeast; Freelands Croft nursing home to the east of Redfields Road and Blue Prior Business Park to the west of Ewshot Lane. There is also the consented development at QEB which will further impact on the character of the area. Whilst part of the site lies within the Fleet/Ewshot gap, it is not considered that it plays any particular role in providing separation between the two settlements. The STR007 SHLAA stage 2 high level site assessment (February 2015) acknowledges that the Local Gap boundary does not follow any physical boundary on the ground. Indeed, the character of the area is impacted by the development to the north and west and the emerging development to the east at QEB. The site therefore has the potential to accommodate development without giving rise to any significant impacts on the character of the area or the sense of separation between the two settlements.

Whilst the site lies within 5km of the Thames Basin Heaths SPA, as the Council will be aware from the appeal in respect of 300 homes at Albany Park, there is significant additional capacity in the proposed SANG at Albany Park, which is capable of serving development at Ewshot Lane.

The Albany Park proposals include a proposed medical centre, a convenience food store (both of which would be in walking distance from this site), funding for the extension of Zebon Copse Centre (plus provision of additional sports pitches and pavilion) and significant transport improvements to Redfields Lane (including the junction with the A287 to the south).

This deliverable site can be considered for development. It is well related to the existing settlement and would benefit from the infrastructure outlined above being provided at Albany Park.

As discussed above, approaches for housing delivery are likely to require a combination of extensions to sustainable settlements, a new settlement and strategic urban extensions. Therefore land West of Ewshot Lane should be included in the emerging Local Plan, representing an option which would complement the Council's housing delivery strategy and in particular respond to short term housing needs.

We trust that the above representations are helpful to you and await confirmation of their receipt. In the meantime, should the Council have any queries or require any further clarification on the above matters, please do not hesitate to contact me.

Yours faithfully,



SISSI YANG
Planner