

Hearing Statement Matter 12

**Representations
on behalf of the landowners
of
SHLAA site**

C20/proposed allocation H19

**Baginton - Land north of
Rosswood Farm**

October 2016



Introduction

This Hearing Statement is submitted on behalf of the landowners of SHLAA site C20 which comprises the original Site H19, as proposed in the submitted Local Plan. This Hearing Statement relates only to the Inspector's questions raised regarding Policy H10.

Policy H10 – Bringing forward allocated sites in the Growth Villages

22) Is criterion a) reasonable and realistic?

We support the principle of the consultative approach set out in part a) of this policy in the Submission Version and welcome the changes made since the Draft Plan (which required a “collaborative approach” and did not provide for the eventuality of Neighbourhood Plan Teams not existing).

However, we still feel that the policy still places an unreasonable burden on developers of allocated sites and the consultation it seeks to deliver would occur, in any event, through the normal planning process. As such, it is unnecessary.

Allocated sites would still require the submission of planning applications to the District Council. The Parish Council, local residents, Neighbourhood Plan teams (if they exist) and other stakeholders will be consulted through the planning process. It is also likely that larger sites would be subject to pre-application advice and community consultation/publicity ahead of submission.

It is unnecessary and unrealistic to require an additional layer of consultation for such sites which, by virtue of the allocation, have already been deemed to be appropriate locations for development.

23) Is the approach to housing mix in criterion b) sufficiently clear and justified?

This policy places undue weight on the Strategic Housing Market Assessment (SHMA). This approach is not justified. The policy requires evidence in parish or village Housing Needs Assessments to be up to date, but does not require the same of the SHMA; it need only be the latest version.



Paragraph 50 of the NPPF requires local authorities to “*plan for a housing mix based on current and future demographic trends, market trends and the needs of different groups in the community*”. This cannot be achieved by strict adherence to the SHMA. The evidence behind a SHMA can become quickly out of date as new population projections are published and the information contained in it is district wide. It does not accurately reflect the local demand of the parish or village, including specific groups within it.

The housing mix should be determined at application stage based on the most up to date evidence of need and demand, from whichever source is most appropriate at that time.

24) What is the basis for the phasing approach set out in criterion c)? Is it justified and consistent with national policy?

We welcome the deletion of criterion c) from the Submission version of the Plan.

The Draft Plan phasing strategy, which restricted growth on single sites to 50 dwellings at a time over a period of 5 years (effectively 10 dwellings per annum) is not consistent with National Policy.

Paragraph 49 of the NPPF requires local authorities to “*boost significantly the supply of housing*”. A phasing will fail to boost significantly the supply of housing since it will artificially constrain delivery and is contrary to the general thrust of Government policy.

This approach could also constrain the delivery of infrastructure and have a detrimental impact on viability.