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Dear Councillor,

You will be aware that at the council meeting of 27 November the council voted to test only Winchfield for a new town in Hart which is now being tested.

I believe you should change your approach to this for a number of reasons:

1. Opens up Hart to be a sink for 3,100 additional houses to deliver the unmet needs of Rushmoor and Surrey Heath.

1. The environmental impact of the proposal is likely to be severe as the proposed new town is near to many Sites of Interest to Nature Conservation, within the Thames Valley Heath SPA zone of influence, close to the Basingstoke Canal SSSI and the ancient woodland SSSI of Odiham Common.
2. The demographics of the district are changing. By 2031, there will be an additional 10,000 people over 60 (including more than 6,850 over 75) expected to be living in the district and an extra 3,620 people who will be suffering from dementia or have some sort of mobility problem. The elderly and infirm are best housed in specialist accommodation which increases improves their well-being and when they move, they free up larger homes for families. This new town proposal will build the wrong type of housing in the wrong place which will crowd out the development required to adequately care for the elderly and infirm.
3. The SHMA is flawed in that each and every parameter that can be used to project population and the number of households has used high end estimates, the compound effect of which leads to a massively over-stated need for housing in the area – around a third of the 7,500 houses we have to build are due to these flaws.
4. The infrastructure costs for this project are likely to be enormous. A back of the envelope calculation yields a result of around £150m. CIL funding is likely to be around £40-45m, so where is the additional funding going to come from?
5. The council has not adequately explored alternative options such as brown-field sites, replacing disused office space with housing or adequately considered other places in less environmentally sensitive areas or other land identified in the cabinet papers.

The evidence for the points above is given in Appendix A.

This is an important time for Hart and decisions taken today will impact the district for decades to come. I urge you to think again and change tack to protect our environment and the future needs of the elderly, the infirm and those in need. Please sign the petition opposing these proposals: <https://you.38degrees.org.uk/petitions/we-hart>

Yours sincerely,

**Appendix A**

1. **Sink for Surrey Heath and Rushmoor**

A new town in Hart, whether in Winchfield or anywhere else, will open up Hart to be a sink for 3,100 overflow houses from Surrey Heath and Rushmoor. Yet Hart District Council’s strategy for the Local Plan has set us on the path for a new town which makes this inevitable and will destroy our green fields and wildlife habitats and clog up all of our infrastructure.

The Strategic Housing Market Assessment (SHMA), calls for Hart to build a total of around 7,500 houses in the district up to 2031.  Our neighbouring districts, Surrey Heath and Rushmoor also have demanding targets and are saying that they cannot build all of their own allocation in their districts.  So, they want to pass over an extra 3,100 or so houses (1,700 from Rushmoor and 1,400 from Surrey Heath) to Hart that will push our target up to around 10,600 houses.  See answers to questions [here](http://wehearthart.co.uk/wp-content/uploads/2015/01/Council-questions-26-11-14-Public-and-Councillors.pdf), page 17.

In the housing options [papers](http://wehearthart.co.uk/wp-content/uploads/2015/01/14-11-06-J-Cab-Local-Plan-housing-Strategy.pdf) the council says that we would need to deliver 1,800-2,400 houses on a new settlement (Option 4).  However, the [Barratts New Town proposal](http://wehearthart.co.uk/wp-content/uploads/2015/01/140-Winchfield-Garden-Community-Vision-Doc-compressed.pdf) document says that such a new settlement would have capacity for 5,000 houses, more than twice the size of Elvetham Heath, and could start building as early as 2017.  This leaves a convenient surplus  of around 3,000 dwellings in the new settlement that could be used to fill the shortfall  from Surrey Heath and Rushmoor.

I believe this is a grave strategic error on the part of Hart Council because they are following a policy that means there is a real risk we will have to build even more houses in Hart and concrete over our green fields.

The impact of this could be enormous:

* Massive increase in congestion throughout all of the district.
* Increased stress on already creaking infrastructure
* Overcrowding of trains already running over capacity
* Massive environmental harm to the SSSI’s, SINCs and the Thames Valley Heath SPA
* Coalescence of Fleet, Church Crookham, Crookham Village, Dogmersfield, Winchfield, Hartley Wintney and Odiham into a giant conurbation.
1. **Environmental Impact**

The Barratts proposal for a new town at Winchfield reveals a plan for up to 5,000 homes can be found here:

<http://wehearthart.co.uk/wp-content/uploads/2015/01/140-Winchfield-Garden-Community-Vision-Doc-compressed.pdf>

The information on the environmentally sensitive areas of Hart can be found here:

<http://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/SA%20Scoping%20Appendix%203%20Baseline%20Information.pdf> (p20).

As can be seen from the map, the proposed development:

1. Is within the Zone of Influence of the Thames Valley Heath SPA
2. Contains numerous Sites of Interest to Nature Conservation (SINCs). The proposed housing will wrap around all of these SINCs which must have a detrimental impact on the wildlife within the SINCs
3. Is so close to the SSSI sites at Odiham Common and Basingstoke Canal that it must be damaging to those sites
4. **Changing Demographics**

The SHMA and Appendices can be found here:

<http://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/HRSH%20Consultation%20Draft%20SHMA%20May%202014.pdf> and

 <http://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/HRSH%20Consultation%20Draft%20SHMA%20Appendices%20May%202014.pdf> )

Figure A4.11 in the appendix document sets out that it is expected that the population of Hart will increase by 14,293 people over the plan period. Of this population increase 10,087 people will be aged over 60 and of those 6,852 will be over 75. Figure 10.14 in the main document shows there will be 3,620 extra people in the district suffering from dementia or mobility problems by 2031.

This will lead to a need for much more sheltered housing and extra care housing in both open market and social rented sector. If you were to look at the land buying criteria of McCarthy & Stone and Churchill, you will see they build on brown-field sites close to doctors, dentists, banks, post offices, public transport and shops. They do not build in new towns. McCarthy and Stone has sponsored research into this here:

<http://www.mccarthyandstone.co.uk/documents/research%20and%20policy/oorh%20full%20report%20may%202011.pdf>

They conclude that the housing needs of the elderly are different, that supply of specialist housing is not high enough and that the provision of such specialist housing can free up existing housing stock for growing families.

The SHMA in section 9 says:

*“Estimates of the sizes of market housing required from 2011 to 2031 based on demographic trends suggests the majority need to be two and three bedroom homes. This would largely reinforce the existing profile of stock, with a slight shift towards a requirement for smaller dwellings relative to the distribution of existing housing”*

This is clearly a flaw in the SHMA as they are suggesting we need to build housing stock of a similar nature to that of today, to meet the needs of a very different demographic of the future.

Figure 8.5 of the SHMA shows that Hart needs to build between 90 and 260 Affordable homes per annum if the affordable home backlog is to be closed within 5 to 10 years. This is a substantial proportion of the overall 370 per annum houses that need to be built within the plan period. It is difficult to see how the new town proposal is going to address this need.

In summary, the building of a Barratts housing estate in Winchfield will build the wrong type of housing in the wrong place and crowd out the provision of the types of housing stock we actually need to build to meet the needs of the elderly, the infirm and those in need.

1. **SHMA Flaws**

There are numerous flaws in the SHMA document. The compound effect of these massively over-state the future housing needs of Hart. These are as follows:

## Process

1. The process that was adopted to select Wessex Economics to conduct the SHMA. Their website (<http://www.wessex-economics.co.uk/about/> ) indicates that they have extensive experience in the property sector, but the principal’s background is with DTZ a leading provider of services to investors and developers. I am concerned that such a company will be biased towards “development” and not sympathetic to the needs of local people or the environment.

1. In the appendix (A1.2), the process for stakeholder engagement is set out. The main people consulted were from local authorities or from developers and housing associations or their representatives. If the main people consulted are the salivating developers, it cannot be a surprise that their input errs towards the need to build more. Given this, how can the SHMA be a truly Objective Assessment of Housing Need?

## Content

There are a large number of tautologies and flawed assumptions in the SHMA which I would like to draw out and thus challenge the overall conclusion.

1. Surrey Heath and Rushmoor are both more highly developed than Hart, so one must challenge the rationale for grouping largely rural Hart with such heavily built up areas. Would it not be more appropriate to group Hart with more rural districts to the west and south?
2. The report uses as it starting point for the OAHN the official government projections for the number of households in the Housing Market Area (HMA) that includes Hart, Rushmoor and Surrey Heath which states that the total number of new homes required per annum is 790. These CLG numbers are themselves projections of past development and inward migration and they are essentially saying our future need should be based upon past building which is clearly an absurd position.

1. The report then states that the ONS usually understates these requirements so it makes an arbitrary adjustment upwards to 925 homes per annum. However, the government website (<https://www.gov.uk/household-projections-notes-and-definitions-for-data-analysts> ) states that “The current methodology in England reflects work to improve the household projections outputs and methods to better meet user needs”. I cannot see the justification for a small economics consultancy to challenge the official government figures when the government itself asserts that it has improved its methods and outputs.
2. The report then further adjusts the forecasts upwards to 1,180 houses per annum to take account of employment forecasts. This seems to me to be a tautological argument in that building 790 new homes per annum will already increase employment. I can see no justification for such large incremental additions that compound an already difficult problem.
3. The summary in section 3 notes that the level of household growth in Hart at 10% over the past 10 years has been higher than the regional and national averages. This growth in households can only have been accommodated by new building (e.g. Elvetham Heath in Fleet and St Mary’s Park in Hartley Wintney). It seems invidious to me that the estimate of future housing need is fundamentally driven by past development. This can only lead to the conclusion that over time, more building will lead to even more building which is absurd and cannot be “sustainable”.
4. Section 7 of the report deals with migration into and out of the Surrey Heath, Rushmoor and Hart Housing Market Area (HMA). Figure 7.5 draws a correlation between migration and housing completions. In essence, if you build more houses more people will come to the area. This is perhaps an obvious point. For Hart in particular, they use the years of 2005-2010 as the years that are most representative of the trend of migration (years in which significant building in Elvetham Heath and other places was taking place). This skews projections of future population and household growth on past levels of house-building. It is a “build it and they will come” approach that does not reflect the underlying “need” of the existing area.
5. More recent trends in Figure 7.4 shows a slowdown of migration and indeed a net outward migration from Hart during 2009-2011 and a net outward migration from the whole of the HMA in 2011-12. In essence they are saying in para 7.35 that we must assume levels of house-building during the credit boom (itself hardly sustainable) to support the population growth of that time in order to predict future population growth for which we will then need to build even more houses. This is an absurd tautology which leads to a gross distortion of underlying need. I would strongly suggest we should use as a base projection the more recent house-building trends that are both environmentally and financially more sustainable and also use the more recent migration trends.
6. Figure 7.7 shows that the trend in household size as measured by the census is slightly upward for the period from 2001 to 2011. However, all of the forward projections reverse this trend and predict a further fall in average household size without any justification. Wessex have taken some mid-point of the CLG projections. Why can’t we use forward projections based on the trend for the last 10 years and thus reduce the OAHN?
7. Para 7.63 assumes as its base level a higher rate of future job growth (700 p.a.) in the future than was achieved (650 p.a.) during the exceptional, unsustainable boom years of 1998-2008. This again inflates the future housing requirement and is based on an unsustainable assumption.
8. However, the whole section on modelling employment growth assumes we will have more jobs as a result of the additional houses built as a result of the over-inflated population projections discussed above and then says that we will need to build even more houses to cater for the additional jobs. This is another example of a tautology of more houses being required to cope with the additional houses already in the plan and is clearly absurd.
9. Paras 7.68 and 7.69 then further exaggerate the future level of job growth by suggesting it could rise to 1,560 jobs per annum, more than double the Scenario 1 estimate which is based on employment growth that occurred during the largest, unsustainable credit boom in history. The final jobs growth based estimate used is then a mid-point between the already over-estimated base assumption and the wildly exaggerated high end projection. Why aren’t we using projections based on more sustainable economic and environmental assumptions?
10. Para 7.81 sets out six ways in which jobs can increase without increasing the need for additional housing. Para 7.83 says the modelling has taken account of only one of those factors. This again has the impact of increasing the housing stock required in the OAHN – why can’t we take account of all six ways in which jobs can increase without building more housing?
11. Figure 8.9 suggests Hart needs to build around 260 affordable homes per annum as part of the overall 370 homes per annum required. It is unclear to me how building a new town in Winchfield will address this affordable requirement. Can this be explained please?
12. Para 7.119 states the following *“These market signals point to the need to identify and address the demographic and economic need for housing; they do not themselves provide a quantifiable need for housing (and indeed there is no recognised methodology for this)”*. This might be interpreted as the methodology that has been used is somewhat pie in the sky and there is no real approach to determine real need. So, why do we have to follow a methodology that will inevitably lead to the destruction of the most attractive parts of the region?
13. **Infrastructure Costs**

Much has been made of the infrastructure benefits of a new town. But it is clear that this has not been properly thought through. Back of the envelope calculations yield an estimated cost of over £150m. This compares to informal estimates of £40-45m available from the CIL charge made on developers. How will the funding gap be closed? See cost estimate below.



1. **Alternative Options**

The council has not adequately considered alternative options for building. Moreover, the council had not even considered “late entries” to the process such as Lodge Farm before recommending building a new town at Winchfield. If they took account of the points above, we would need less housing and could consider many alternative sites such as:

* Under-utilised office space at Ancells Farm to be removed and replaced with new homes, potentially “affordable” flatted accommodation.
* Under-utilised office space to the east of Fleet between Church Road and the station could also be converted to homes
* The “Sun” complex near Junction 4a is unused, and could be a candidate for development, even though close to the SPA
* Hartland Park where the building of a new warehouse seems not to have started
* Utilise the space above shops on the High Street for housing
* Under-utilised office space in Hook be removed and replaced with housing
* The armed forces are reducing in size, surely over the next 20 years, some of the land used for RAF Odiham or Gibraltar Barracks can be used for housing
* There is a lot of less environmentally sensitive land towards the south of the district that could utilise the A31 and Alton rail line for transport links.