



WINCHFIELD PARISH COUNCIL

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17 March 2016

Mr Daryl Phillips
Joint Chief Executive
Hart District Council
Civic Offices
Harlington Way
Fleet
Hampshire GU51 4AE

Dear Mr Phillips

Representations of Winchfield Parish Council in response to the Draft Hart Local Plan Consultation 4 February – 18 March 2016

Please find enclosed Winchfield Parish Council's representations in response to the Draft Local Plan Consultation.

The Parish Council has a number of significant concerns with aspects of the consultation, most notably surrounding proposed 'Approach 3: Focus growth on a new settlement at Winchfield'. We trust that Hart District Council will give full and proper consideration to our representations, which have been prepared under the guidance and direction of JB Planning Associates Ltd.

To assist, we have set out below a summary of our main concerns:-

Lack of evidence to justify need for a new settlement

- It is premature for the District Council to be asking consultees to identify their preferred approach for meeting its housing need, when serious questions remain over the housing provision target for the plan period.
- There has yet to be any public consultation on the scale of Hart's 'Objectively Assessed Housing Need' (OAN), or other issues related to housing distribution, such as employment, retail, transport, and infrastructure. It is a serious flaw that the scope of the present consultation does not allow for evidence on these matters to be considered through consultation before critical decisions are made about the approach to distributing housing growth over the plan period.
- The SHMA is currently being revised and it therefore seems premature and illogical for the District Council to now be seeking to undertake public consultation in respect to housing options when it does not yet know what its precise OAN figure is going to be.
- The conclusions reached by Urban & Regional Policy with respect to the findings of the existing SHMA raise serious doubt over the District Council's decision to proceed with

considering its housing distribution options on the basis of a flawed SHMA. To deliver a sound plan it is essential that the District Council's OAN is robust, particularly when such important decisions about the location of future growth in Hart hinge on this figure.

- There is also a significant level of uncertainty over the level of unmet housing need from Rushmoor and Surrey Heath needing to be considered as part of the Duty to Cooperate. Given that the whole issue of Rushmoor and Surrey Heath's unmet need is fundamental to the consideration of a new settlement option, this again underlines the fact that it is premature and illogical of the District Council to be asking consultees to identify their preferred approach at this stage for meeting housing need.

Winchfield is not a suitable location for a new settlement

- A significant number of constraints have already been identified by the District Council's consultants in the limited testing that has been undertaken to date. Whilst further assessment work will be required (and, as mentioned above, this should have been undertaken and made available for comment as part of the current consultation) it is apparent that limited regard has been given by the District Council to the significant number of constraints identified.
- The District Council appear to have given significant and disproportionate weight to the presence of a railway station at Winchfield, yet there is no evidence to demonstrate that there is spare capacity at this station, and South West Trains has suggested that the railway station may need to be relocated away from Winchfield and expanded.
- In view of the extent of constraints, we question whether the number of units identified in the SHLAA is a fair and reasonable reflection of the actual capacity of the respective sites forming the proposed new settlement. We are not aware of any evidence to demonstrate how the Council has calculated the capacity of each of the SHLAA sites to accommodate housing, and whether this has taken account of site constraints but also the need to provide a significant level of infrastructure to support a new town (including SANGs, schools, shops, health care facilities, car parking, sewage works, leisure and recreational facilities etc).
- Also, in view of the disparate nature of the SHLAA sites in multiple ownerships that need to be brought together to form the new settlement, it is also highly doubtful that it will be possible for the developable parts of each SHLAA site to combine to form a cohesive, compact and well connected nuclear settlement, introducing major concerns over deliverability.

A new settlement option is not a viable approach

- The list of infrastructure projects required to support the new settlement option is clearly extensive and the costs will be substantial.
- There is a serious lack of evidence that the funding can be secured to provide the essential infrastructure necessary for any housing to be delivered by the new settlement option within the plan period.
- In the absence of detailed testing, there is no evidence to demonstrate that vital infrastructure that could be fundamental to the delivery of the new settlement, such as the new junction onto the M3 and new vehicular crossings of the railway line, can actually be delivered.
- If there is not a deliverable supply of developable new housing land over the plan period, with suitable infrastructure provision, the Local Plan will be contrary to the NPPF (paragraphs 47 and 173).

- In the meantime, housing pressures will be building up in settlements across the District exacerbating already critical 5 year land supply requirements. This will leave the District's population dependent upon the delivery of a new settlement, which may never materialise, or at best happen over a very long period of time. The Plan would therefore be ineffective and will therefore not meet the soundness criteria of the NPPF (paragraph 182).

Alternatives - Brownfield Opportunities

- To demonstrate compliance with national policy, the District Council should be prioritising brownfield development through working in a positive and proactive way with landowners and developers to identify opportunities to develop under-used and unviable brownfield land through initiatives including the 'Brownfield Site Register', 'Starter Homes Exception Sites Policy', 'Self-Build Register', and 'Starter Homes fund'.
- The District Council has largely ignored the findings of a report prepared for it by Stonegate Homes on the 'Viability of office to residential conversions to meet Hart DC Housing Supply' (2015) which demonstrates that there is significant development potential for brownfield sites within the District.
- Further opportunities are also presented by the recently announced changes to permitted development rights, which have ended potential uncertainty for developers caused by the deadline of 30 May 2016 for the residential conversions of office buildings to be completed.
- Further investigation of brownfield opportunities is clearly required; it apparent from the 'Zones of Brownfield Opportunity' that have already been identified by the Council that significantly more capacity for residential development on brownfield sites exists than that currently set out in Appendix 1 of the Consultation Document. Again, it is premature for the Council to be asking consultees to identify their preferred approach or approaches for developing greenfield land, whilst there remains uncertainty over the capacity of brownfield development to meet that need.

Alternatives – Disperse Development and Strategic Urban Extensions

- The District Council's 'Economic Development Strategy' (2015) identifies that the District Council must direct its resources to urban regeneration, and that its strong natural environment is a key reason why businesses locate in Hart. The new settlement option would pull investment away from Hart's existing settlements and have a significant impact on Hart's natural environment.
- Focusing growth in and adjacent to Hart's main settlements would, on the other hand, boost investment in infrastructure and regeneration in the locations where it is needed most.
- National planning policy and guidance is also clear that the provision of a limited number of new dwellings within rural villages will enhance the sustainability of such settlements by providing additional demand for local services and facilities.
- Hart has a sizable ageing population, and given the importance of accessibility to existing services and facilities to older people, particularly those who are less mobile, coupled with a strong desire to remain in their existing communities where they have social ties, it would clearly be inappropriate to meet the needs of the elderly through a new settlement option.

Winchfield Parish Council is keen to continue discussions with the District Council as work on the Local Plan progresses. In doing so, it is our hope that we can assist the District Council, by all reasonable means, in formulating a sustainable development strategy for the new Local Plan,

which delivers growth as soon as possible within the Plan period in a fair and achievable manner across the District, supporting the vitality and viability of Hart's existing settlements, whilst protecting and enhancing high quality natural and historic environments. We consider it is clear from our representations that 'Approach 3: Focus growth on a new settlement at Winchfield' would fail to deliver on the objectives of the new Local Plan, and therefore a strategy focused on this approach would be found unsound at Examination. Given the urgency for the District Council to have its new Local Plan in place, we consider that this is not a risk that the District Council can afford to take.

I would be pleased if you could acknowledge receipt of the enclosed representations.

Yours sincerely

A handwritten signature in black ink that reads "Andrew Renshaw". The signature is written in a cursive style and is underlined with a single horizontal line.

Andrew Renshaw
Chairman of Winchfield Parish Council
Enc: Representations of Winchfield Parish Council dated 17 March 2016