

## Suggested Hart Housing Options Consultation Responses

### Part 1, Q 1:

Before focusing on meeting the “needs” of all groups, you should define “need” properly. The current Strategic Housing Market Assessment (SHMA) has two main flaws. First, it is based on out of date population projections; latest 2012-based projections show a reduced population and number of households for Hart. Second, latest PAS guidance says that the “OAN should be principally understood as a measure of future demand rather than aspiration”. Yet the future jobs forecasts call for a near doubling of the job creation rate compared to the period 1998-2012, with consequent massive increases in the labour market participation rate and additional housing. Between 2009-2013 we have not produced jobs at this forecast rate. These aspirational jobs forecasts should be removed from the SHMA which will reduce “need”, remove the pressure for Hart to build for Surrey Heath & Rushmoor and free up more redundant brownfield land for housing development. The total of these points should remove 2,000 houses from Hart’s “need” (and over 12,000 from the Housing Market Area) according to Alan Wenban-Smith.

Moreover, if you are serious about meeting the need for affordable and starter homes and the needs of the elderly, you should introduce some processes for measuring how many 1 & 2-bed properties (both affordable and open market) and how many specialist units for older people have been built or permitted. The response to WeHeartHart questions to council and FOI requests demonstrates there are no effective measurement mechanisms.

### Part 1, Q 2:

Suggested answers to the questions:

a) As of 26/11/15, the cheapest 1-bed and 2-bed new homes available within 1 mile of Fleet are available at prices of £215,000 and £235,000 (Rightmove). Median household incomes for Hart are £40,200 per Figure 4.8 of the SHMA. This means that the cheapest new homes are between 5.3 and 5.8 times median incomes and out of reach for the average household. Clearly something needs to be done, but building 3 and 4 bed properties in the countryside is not going to meet this need. Figure 9.8 of the SHMA, sets out the proportion of dwellings that we must build across market and affordable homes by number of bedrooms. Using Hart’s target of 40% affordable homes, this works out at around 3,800 1 and 2-bed properties are required. It would be better to build smaller properties on brownfield sites such as Ancells Farm, Fleet Road, Harlington Way in Fleet and Bartley Wood in Hook to give younger people a more affordable first step on the housing ladder. You should introduce a way of measuring how many of these dwellings have been built or permitted and report on it at least every year.

b) Maybe you could set aside one or more of the brownfield sites (in the answer to Qu 4) and ask a group of self-builders to come up with a combined scheme.

c) We need to build over 2,500 specialist units for the elderly over the plan period, or around 1 in 3 of the total need. This type of housing is best built on brownfield sites at locations close to amenities such as banks, doctors and chemists. It seems Hart is falling behind in meeting this need and should be encouraging more mixed use development on brownfield sites such as Fleet Road and Harlington Way (including Hart Offices and Harlington Way) in Fleet and you could consider redeveloping parts of the centres of Yateley, Blackwater and Hook into mixed use to accommodate the elderly.

d) As Hart already accommodates more than half of Hampshire's local authority provision, it is time that other areas of Hampshire meet any further future need, so Hart should not create any extra capacity over and above the provision already made as per the suggestion in the report you refer to.

**Part 1, Q 3:**

Answer No, to the question, with the following comment:

The last consultation made clear that a majority of those who responded thought all settlements, however small, should take some additional housing. The options you have put forward have excluded the smallest settlements from consideration, and therefore the settlement hierarchy is flawed. It also seems invidious that you should put Dogmersfield in Tier 4, when it is very small.

**Part 1 Q 4:**

Suggested answer to the prioritisation question

Approach 1: 1

Approach 2: 2

Approach 3: 3

Suggested comment:

I do not agree with the way this question has been put because a) you have to put an answer against each approach even if you don't wish to see that approach proceed and b) you have ignored the 2,130 signatories of the We Heart Hart petition who called for a brownfield solution to our needs. Even though I have been forced to rank the urban extension and new settlement option, I do not wish to see those options selected. You should produce and consult upon a brownfield scenario. This would include the list of SHLAA sites below, plus the vacant and under-used office blocks in Fleet Road and Harlington Way in Fleet (including Admiral House, Flagship House, Hart offices and the Harlington Centre), as recommended by Fleet Future, Ancells Farm, and the many under-used office blocks in Hook in and around Bartley Way as suggested by Stonegate. Moreover, the Pyestock development should be changed to mixed use or housing as it appears the proposed distribution centre is not going to be built.

List of SHLAA sites suitable for brownfield: SHL21, SHL100, SHL106, SHL28, SHL158, SHL39, SHL104, SHL127, SHL140, SHL36, SHL80, SHL174, SHL235, SHL41, SHL42, SHL50, SHL69, SHL102, SHL113, SHL127, SHL245, SHL275, SHL320, SHL322, SHL357, SHL95, SHL216, SHL111, SHL296, SHL29, SHL66, SHL119, SHL70, SHL172, SHL34, SHL84, SHL114. Plus the new sites SHL81, SHL176, SHL178, SHL179 & SHL189

**Part 1: Q 5**

Suggested answer to the prioritisation question

Approach 4: 1

Approach 5: 4

Approach 6: 3

Approach 7: 2

If you followed the suggestions made in response to the questions above all our current “need” could be met by brownfield sites alone. By working on the SHMA to reduce need through taking account of the new Government population and household forecasts and reducing the future jobs forecasts to a more realistic level, then we would need fewer houses and we would have a surplus of brownfield land. Moreover, the reduced housing need from a revised SHMA would remove the threat of Hart having to take 3,000 houses from Rushmoor and Surrey Heath.

I have only responded to this question because the form forces me to, but I do not believe any of the combinations suggested is required.

## Part 1 Qu 6.

**Blackwater.** Suggested order Guillemont Park: 1, Brook House: 2. Comment: Suggest add in brownfield site SHL21, Linkwater Cottages – reason for not selecting weak, as there is already development there. Consider new brownfield SHL176.

**Bramshill.** Comment: Suggest add in brownfield site SHL106, Police college. This site contains a Grade 1 listed building and some ageing 1970's accommodation blocks. We should make the best use of this site to sympathetically redevelop the main house to preserve it and replace the old accommodation blocks with attractive homes.

**Church Crookham.** Comment: Add in brownfield site, SHL28, listed as developable, and SHL81 newly added.

**Crondall.** Rank 1, 2, but only because forced to. Comment: Suggested sites inappropriate unless put forward in a Neighbourhood Plan. Consider re-thinking SHL76. Consider new brownfield sites SHL178 and SHL179

**Crookham Village.** Comment: SHL150 is probably not required. Add in brownfield site SHL158.

**Dogmersfield.** Comment: Combined site looks like too much of a large scale development for Dogmersfield unless unless put forward in a Neighbourhood Plan. Suggest brownfield site SHL39 instead.

**Elvetham Heath.** Comment: Site listed in SHLAA with capacity of 45 not 40. Should develop this.

**Eversley.** Rank the sites only because you have to. Comment: I do not wish to develop any of the green field sites above unless put forward in a Neighbourhood Plan, but please consider brownfield sites SHL117 (deliverable) and brownfield sites SHL127 and SHL140.

**Ewshot.** Comment: Suggest go forward with COM006 (1), and I have only ranked the other two because I have been forced to, these should not be considered unless put forward in a Neighbourhood Plan. Please consider again brownfield sites SHL80 and SHL174 and SHL36 alone.

**Fleet.** Go forward with SHL320 (1), 322 (2), 357 (3), put in the remaining site, SHL338 as 4, but only because forced. Comment: I have only added SHL338 because forced to, but it should be considered in conjunction with Pyestock. Add in brownfield sites SHL41 (developable) and 42 (developable), SHL50, SHL69, SHL102 (former sewage works), SHL113, SHL245 and SHL275. Consider again site SHL333, particularly in conjunction with Pyestock.

**Hartley Wintney.** Suggest put in order 1,2,3 (as forced to put in an order). Comment: Don't pursue any of the shortlisted sites unless put forward in a Neighbourhood Plan. Consider again brownfield sites SHL95 and SHL216 and consider new site SHL189. Can you explain why the combined capacity of SHL19a and SHL19b (190) is greater than the entire SHL19, listed in the SHLAA with a capacity of only 80

**Heckfield.** Don't pursue SHL92 unless put forward in a Neighbourhood Plan.

**Hook.** Suggest order 3, 2, 1. Comment: Pursue brownfield site SHL111. Only pursue sites SHL9 & 130 as a last resort, but these sites, being outside of the SPA zone of influence are by definition more sustainable than all those within the zone. Add in brownfield sites such as the vacant offices in and around Bartley Wood estate. Consider redeveloping the not-so-Grand Parade.

**Long Sutton:** Suggested order: 1, 2, 3, 4, but only because forced to. Comment: I do not wish to see development in any of these sites and have only ranked them because forced to do so unless put forward in a Neighbourhood Plan. You should reconsider brownfield site SHL296.

**Odiham.** Suggested order 1, 2, 3, but only because forced to. Comment: I do not wish to see any of the sites listed developed and have only ranked them because forced to do so. However, you should consider again sites SHL58, 66, 119, 232, 233 and 327 as listed in the Odiham neighbourhood plan and brownfield sites SHL29 and 119.

**South Warnborough.** Suggested order: 3, 2, 1. Comment: I do not wish to see sites SHL33 and 71 developed unless put forward in a Neighbourhood Plan, I have only ranked them because forced to do so. You should also consider again brownfield site SHL70.

**Winchfield.** Comment: I do not wish to see any of the strategic sites at Winchfield developed into a new town. The Neighbourhood Plan team are coming up with a range of sites for development that will be better suited to the character of the village. Consider again brownfield sites SHL 34, parts of 84 and 114. The strategic sites identified are all "not currently developable" and because they cover both sides of the M3 and railway to not constitute a viable settlement, especially when the space required for SANG, sewage, railway station, M3 junction and schools are considered.

**Yateley.** Ranking: 1,2. Comment: I do not wish to see either of the sites listed to be developed unless put forward in a Neighbourhood Plan. I have only ranked them because forced to do so. You should consider redeveloping parts of the town centre to be more suitable for a settlement of this size.

## **Part 2, Q7.**

I disagree with the way you have put this section together because a) you have not included all sites in the SHLAA, b) you have not included the rejected sites for ranking, c) you have not made clear your criteria for rejecting some sites and rejecting others even though the vast majority of sites are "not currently developable", d) you have not included all of the brownfield sites in the SHLAA for ranking and not included the sites identified by Stonegate, and e) the way you have put the ranking together will not allow valid statistical comparison to be made between parishes. You should have used an absolute scale for each site along the lines of Strongly Support, Support, Oppose, Strongly Oppose development at this site.

Peter Village QC said *"There has been no regulation 18 consultation at all on issues such as employment, retail, transport, infrastructure (or, indeed, anything other than housing distribution). It is inconceivable that a coherent and sound local plan could emerge without addressing most (at least) of these issues. Thus, the Council presently appears to be in a hopeless position if it maintains*

*its current course. Either it will proceed with a plan that does not address fundamental matters".*  
This consultation is still just about housing. You need to consult on all these other matters too.

The new town proposal you have put forward is not necessary, not deliverable and not viable because the council itself has identified significant barriers to delivery. The geography of the selected site that are not contiguous, bisected by the M3 and the railway and containing many SINCs, TPOs and SSSIs means that it will not be possible to plan a coherent settlement. Not only that, the housing capacities identified have not taken account of the amount of SHLAA required, nor space for schools, shops, healthcare, sports or community facilities. This means that it is unlikely that the sites have sufficient capacity to meet the minimum threshold of 5,000 dwellings. The new town proposal will also effectively coalesce the west of Fleet, Winchfield, Dogmersfield, Hartley Wintney and Hook into a giant conurbation, that might be termed Hartley Winchhook which would be most undesirable.

### **Part 3 Q1**

Suggest answer No.

Comment: You have not identified the issue of the many vacant retail and office blocks across Hart and the wider Housing Market Area, nor have you set any objective for redeveloping any of that excess capacity. The proposal for urban extensions and a new settlement will apparently make worse key issues 4, 5, 6, 7, 10, 12, 13 and 14. You have not addressed how the centres of our major settlements like Fleet, Hook, Yateley and Blackwater will be redeveloped to meet the needs of our growing population, such as increasing mixed use developments and provision of facilities like a cinema or theatre.

### **Part 3 Q2**

Suggest answer "Disagree".

Comment: The vision you have set out largely ignores the 1,800 units on brownfield land you said was "readily quantifiable" in September.

Hampshire County Council has not done any pupil planning beyond 2018; their current estimates are for a modest surplus of school places and have said a new secondary school would need at least 900 pupils; the latest Government projections forecast a lower population in 2031 than before so the case has not been made that new schools are in fact required, and the secondary school location proposed in the Barratts vision document was next door to an institution holding sex offenders, so you have not put forward a credible plan for where new schools, should they be required will go.

New urban extensions or a new town will severely damage our green infrastructure and most of the proposed locations are within the SPA zone of influence and so will damage the SPA.

The new town as proposed will decimate Winchfield and lead to coalescence between Winchfield, Hartley Wintney, Hook, Fleet, Dogmersfield and North Warnborough, therefore the character and identity of our settlements will be damaged. There is a brownfield solution that you are not properly considering. You have not mentioned the need to protect one of our greatest assets, namely

Basingstoke Canal. You have not commissioned any work to understand the value of Hart's environment that will be destroyed by more green field development. You should consider working with people like Environmental Systems and their SENCE methodology to quantify the value of our countryside.

### **Part 3 Q3**

Suggest answer: No.

Comment: 1) You should work to reduce the "need" by taking account of the reduced Government population projections and unachievable jobs forecasts. You should consider not meeting all of the identified need on environmental grounds. 2) Surrey Heath and Rushmoor can meet their own needs. Under no circumstances should you agree to accept their alleged shortfall. 3) These needs should be met on the many brownfield sites in the district. 4) There are many vacant retail premises and a forecast massive surplus of employment land. This does not need to be "protected" and should be redeveloped for housing. 5) You have made no mention of the current £78m infrastructure deficit nor of the high level expected infrastructure costs or developer contributions for each of your options. You should plan school places using the population forecasts over the entire plan period, not just up to 2018. Most new schools are going to be free of Local Authority control, so who will build those schools? 6), 7), 8), 9) and 10) To achieve these you need to abandon the idea of new urban extensions and a new town.