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**Regulation 19 Objection to the Hart
Local Plan Strategy and Sites 2016 to
2032 Proposed Submission Version**

On behalf of

The Rural Hart Association

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1.0 INTRODUCTION –Who are RHA?

- 1.1 The Rural Hart Association (RHA) is an association of associations whose aim is to protect the rural assets of Hart and coordinate efforts to resist unnecessary building outside of settlement boundaries. For details of Membership see Part B of the Regulation 19 Response Form

2.0 CONTEXT OF REPRESENTATION

- 1.2 The RHA is concerned that Hart District Council are pursuing a policy in their emerging plan that will unnecessarily jeopardise open land in and around Murrell Green/Winchfield and commit to the creation of a new settlement in this area. RHA recognises the need for the Council to identify and maintain a supply of land for housing to meet the needs for growth in the District, and that the Council need to be robust in identifying that supply of land in order to prevent opportunist development across the district. RHA considers however that a strategy based on focussing development within existing urban areas in the district rather than focussing on a new settlement would be more sustainable, more effective in meeting housing need and importantly more effective in regenerating Fleet as a town where the absence of investment and development has led to the town's stagnation and a decline in the fortunes of this important town centre.
- 1.3 This representation will address these issues through a review of national planning policy as set out in the National Planning Policy Framework (NPPF) and the recent draft NPPF currently published for consultation.
- 1.4 This representation will also demonstrate that a mixed use retail and residential regeneration of Fleet town centre is both desirable and achievable.
- 1.5 This document will demonstrate how the Council have over-stated the need for housing in the district to the extent that the designation for a new settlement in the Winchfield/Murrell Green area is unnecessary. It will also show how significant capacity remains in Fleet to meet much of the housing need and in so doing will lead to the regeneration of the declining town centre. It will highlight flaws in the Council's approach to development and focus on the Council's strategy to divert development away from existing centres for political reasons rather than sound planning judgements, in conflict with national planning policy. We will highlight a policy approach where negative barriers to development are inappropriately used to prevent housing development based on dogma rather than planning need.

2.0 POLICY CONTEXT

National Planning Policy Framework (NPPF):

- 2.1 The National Planning Policy Framework (NPPF) was published and adopted on 27 March 2012 and National Planning Practice Guidance (NPPG) is a material consideration. The overarching theme running through the NPPF is securing sustainable development.
- 2.2 Paragraph 17 of the NPPF sets out 12 Core Planning Principles which are to underpin plan-making and decision-taking in planning. These are as follows; to be plan led; seeking ways to enhance and improve places, to support economic development; secure high quality design and good standard of amenity; to take account of the different roles and characters of different areas; to support the transition to a low carbon future; taking account of flood risk; encouraging re- use of existing resources and renewable resources; conserving and enhancing the natural environment and reducing pollution; to encourage the re-use of brownfield land; promoting mixed-use developments; conserving heritage assets; to manage patterns of growth, making the fullest use of public transport, walking and cycling; to support local strategies to improve health, social and cultural wellbeing, and deliver sufficient community and cultural facilities to meet local needs.
- 2.3 Paragraph 14 of the NPPF requires that there should be a presumption in favour of sustainable development. Paragraph 17 of the NPPF encourages the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. This is in preference to the development of greenfield or previously undeveloped sites.
- 2.4 Paragraphs 18 – 22 of the NPPF relate to the promotion of economic development. In terms of delivering sustainable development, Paragraph 19 states that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the planning system.
- 2.5 Paragraph 24 states that Local Planning Authorities (LPA) should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.
- 2.6 Paragraphs 150 – 157 of the NPPF refer to plan making whereby Local Plans must be prepared with the objective of contributing to the achievement of sustainable development, and should be consistent with the principles and policies of the Framework, including the presumption in favour of sustainable development (para 151).

- 2.7 Paragraph 154 states that Local Plans should be aspirational but realistic and should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development.
- 2.8 Paragraphs 158 - 177 of the NPPF refer to using a proportionate evidence base. Paragraph 158 states that each LPA 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, and should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and take full account of relevant market and economic signals.
- 2.9 Paragraph 159 states that LPAs should have a clear understanding of housing needs in their area and should prepare a SHMA to assess their full housing needs, identifying the scale and mix of housing and range of tenures that the local population is likely to need over the plan period which:- meet household and population projections, taking account of migration and demographic change; address the need for all types of housing; and cater for housing demand and the scale of housing supply necessary to meet this demand. LPAs should prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. The Government have also produced a standard method for assessing housing need trailed in the “Planning for the Right Homes in the Right Places” document from September 2017 and reinforced in the draft NPPF from March 2018.
- 2.10 In terms of business, paragraph 160 states that LPAs should have a clear understanding of business needs within the economic markets operating in and across their area. To do this LPAs should work with county and neighbouring authorities to prepare and maintain a robust evidence base to understand existing needs and likely changes in the market, and work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability. It goes on to state at paragraph 161 that LPAs should use this evidence base to assess the role and function of town centres and the relationship between them, including any trends in the performance of centres; and the capacity of existing centres to accommodate new town centre development.

Draft Revised National Planning Policy Framework (DRNPPF):

- 2.11 The Government has now published a new draft of the NPPF, the national framework for planning. This is a key document signalling the direction of planning policy across the UK. Consultation on the DRNPPF runs up to 10 May 2018 and the intention is to adopt the policy document as amended in June 2018.
- 2.12 Chapter 7 of the DRNPPF seeks to ensure the vitality of town centres and states that planning policies should: a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and change in a way that supports a diverse retail offer, provides customer choice, allows a suitable mix of uses (including housing) and reflects their distinctive characters; c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones; d) allocate a range of suitable sites in town centres to meet the scale and type of development needed, looking at

least ten years ahead; e) allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre, where suitable and viable town centre sites are not available; f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites; and g) support diversification and changes of use where town centres are in decline, as part of a clear strategy for their future, while avoiding the unnecessary loss of facilities that are important for meeting the community's day-to-day needs (paragraph 86). Paragraph 87 of the DRNPPF states that Local Planning Authorities should apply a sequential test to planning applications for main town centres uses.

- 2.13 Chapter 3 of the DRNPPF refers to plan-making and states at paragraph 26 that Strategic Plans should have a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. They should, as a minimum, plan for and allocate sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be met more appropriately through other mechanisms, such as brownfield registers or local policies).
- 2.14 Paragraph 25 states that the preparation and review of strategic policies should be underpinned by relevant and up-to-date evidence which should be adequate but proportionate, taking account of relevant market signals.
- 2.15 Paragraph 33 states that the preparation and review of local policies should be underpinned by proportionate, relevant and up-to-date evidence, focused tightly on supporting and justifying the policies concerned.
- 2.16 Chapter 5 of the DRNPPF refers to delivering a sufficient supply of homes and sets out at paragraph 61 that: *“In determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment, conducted using the standard method in national planning guidance and that this standard methodology should not be deviated from unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals. In establishing this figure, any needs that cannot be met within neighbouring areas should also be taken into account.”*
- 2.17 Paragraph 68 sets out that strategic planning authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- 2.18 Paragraph 182 of the NPPF refers to examining Local Plans whereby *“the Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A Local Planning Authority should submit a plan for examination which it considers is “sound” – namely that it is:*
- *Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet*

requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

- *Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
- *Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*
- *Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework”.*

Policies of the Hart District Local Plan Strategy and Sites 2016 to 2032

- 2.19 The themes above drawn from the NPPF are included in the Draft Hart Local Plan at paragraph 11 and I will return to them later in my conclusions. Policy SS3 of the HLPSS 2016-2032 Proposed Submission Version allocates a new settlement at the Murrell Green/Winchfield Area of Search and reads as follows:

“Policy SS3 New Settlement at the Murrell Green/Winchfield Area of Search

Permission will be granted for the development of a new settlement to be identified from the area of search identified on the Policies Map following the adoption of a New Settlement Development Plan Document and agreed comprehensive masterplan.

Development proposals will not be permitted which would prejudice the delivery of a new settlement in advance of a robust master planning process.

The development of the new settlement proposals will be based upon the following high-level principles:

- a) Of a scale to support long term development needs beyond 2032 and the provision of key infrastructure and community facilities including a secondary school;*
- b) The potential to deliver new homes from the middle of the plan period;*
- c) Comprehensively planned in consultation with existing communities and key stakeholders;*
- d) Delivery of a sustainable, inclusive and cohesive community promoting self-sufficiency and with high levels of connectivity, minimising separation of communities by existing barriers;*
- e) Deliver innovative and forward-thinking solutions and technology to design, transport issues, telecommunications and measures to mitigate and adapt to climate change;*

f) Provision of a mix of housing in accordance with relevant policies in the local plan and most up to date evidence at the time for affordable housing, specialist provision for the elderly and self-build;

g) Inclusion of measures to avoid and mitigate any adverse impact of the development upon the Thames Basin Heaths Special Protection Area;

h) Promote health and wellbeing and self-containment by providing the necessary supporting infrastructure including green infrastructure, community facilities, employment, education, retail and health care services;

i) Providing the most appropriate location within the area of search for key infrastructure, particularly the new secondary school, having regard to maximising ease of accessibility and to catchments;

j) A layout and form of development that avoids coalescence with existing settlements and does not undermine their separate identity; respects the landscape character and conserves and where possible enhances the character, significance and setting of heritage assets;

k) Provide measures to avoid, mitigate or offset direct and indirect biodiversity impacts across the site, including opportunities for net gains in biodiversity where possible;

l) Supported by a transport assessment and strategy, together with an infrastructure delivery plan that ensures the necessary supporting infrastructure is delivered in a timely fashion and promotes sustainable transport modes;

m) Measures to fully address flood risk and drainage issues.

The detailed framework setting the nature, form and boundary of the new community will be set out in a future Development Plan Document and Supplementary Planning Documents where required.

Mechanisms will also be required which ensure that comprehensive master-planning is properly coordinated across site ownership boundaries to ensure that key items of infrastructure are delivered in a consistent and cohesive way regardless of landownership or phasing”.

3.20 We consider that the Plan is largely sound with the exception of Policy SS3 and related points and that the Hart Local Plan can stand without this allocation. We believe the underlying strategy should be refocussed to provide housing in the urban areas and on brownfield sites in line with the NPPF and that the benefits of this in respect of the regeneration of Fleet town centre should be identified in the plan. We therefore

request that Policy SS3 and all references to the proposed new settlement at Murrell Green/Winchfield be removed and Policy SS1 updated to reflect this.

3.0 PLANNING ANALYSIS

Why it is wrong to allocate the new settlement site now.

- 4.1 The NPPF and the new draft NPPF both ask authorities to plan positively for new development and that is now a given in plan development. The Hart draft plan identifies sufficient housing to meet its five-year housing land supply requirement and indeed sufficient additional capacity to provide for housing need throughout the plan period, acknowledging that this can be achieved without the draft allocation of a new settlement. The new settlement at Murrell Green/Winchfield is identified in the plan itself as unnecessary to satisfy housing demand to the end of the plan period but is included to allow flexibility going forward. Such a policy does the exact reverse.
- 4.2 Allocation of the site now pre-empts the identification of the need for housing growth in the district in the future. The assumption made considers that housing need will continue at current and historic levels but this ignores the fact that housing/population need is a volatile factor and changes swiftly. Planning for a continuation of current trends and needs beyond a fifteen-year horizon is fraught with pitfalls and dangers. Simply assuming any need at all could be a mistake. The UK leaving the European Union will have completely unforeseen effects upon population growth in the long term and will significantly affect migration in ways we do not yet understand. This is just one of many factors that will impact on population and housing need, will affect the location of growth in the UK and will alter our economic forecasts and future to an extent that will inevitably affect housing need. Predicting beyond very short time horizons now without understanding these sign-posted changes cannot be done with any degree of accuracy.
- 4.3 What this designation will encourage is the optioning up of the land subject to the designation and in its vicinity by housing developers to an extent more than any other area of land in this or neighbouring districts. This piece of land will then be the subject of significant speculation throughout the plan period as developers seek to realise the forward planned numbers early or seek to bring forward this green field site ahead of brownfield land that will be more difficult and less profitable to develop. The Council will have given tacit approval for a new settlement without the need having been properly established and will have created a housing market expectation of housing numbers in this area that will set the tone for any negotiations in the future. This situation gets worse however. The Council advocate beginning development of the new settlement site in the mid plan period, this would be , in advance of any review of planning policy, population and housing numbers (programmed for 2023). Indeed the planning policy for a new settlement, that even in the view of the Council is not yet needed, does not contain any suggestion that a need should be established before the development commences. This can be contrasted with the policy NBE1 on Developments in the Countryside which states that:

“Development proposals within the Countryside (defined as the area outside settlement boundaries) will only be supported where they are:

a) Meeting the proven essential need for a rural worker to live permanently at or near their place of work; or..."

- 4.4 It seems that the test for small scale development outside existing settlements is dependent upon proof of need whereas the wholesale allocation of a new settlement can be made without any real effort to demonstrate a need for it.
- 4.5 The Council themselves identify that development of the new settlement should begin in the mid-plan period (2022-2024). This gives the lie to the Council's identified requirement for a new settlement based on housing demand beyond 2032. At this stage the Council have a current housing land supply to satisfy projected need without the new settlement. The settlement therefore should certainly not be started in advance of the identified need or indeed other brownfield sites in the development plan intended to meet the need prior to the end of the current plan. Otherwise any housing built will be in addition to the identified supply and interestingly housing built before the end of this plan period and in excess of housing targets will not go toward meeting a need beyond the plan period. Perhaps a third new settlement would be the Council's response?
- 4.6 As worded no new forecasts based on a post Brexit population and economic projections will therefore be required prior to the start on site for the new settlement. No account will be taken of falling fertility /childbirth rates and household formation rates, no heed given to a potential declining population. Indeed, housing here will be brought forward not only before a need for it has been established but before other sites across the district, presumably including many Brownfield sites, have been brought forward. The Government's advice in the NPPF and a long-established policy convention is that brownfield development land should be used up before greenfield sites are brought forward. The phasing of the new settlement imagined in SS3 (b) during the mid-plan period will substantially undermine this convention.
- 4.7 Setting aside the inappropriate phasing of the new settlement and whilst the Council's intention is laudable in creating a solid housing land supply that is not subject to challenge by developers at appeal going forward, simply having an up to date and adopted Local Plan with a sufficiency of land identified for housing is enough to prevent and protect other green field sites from inappropriate development. The unnecessary allocation of this site means that it becomes a hostage to fortune as a de facto part of the future housing land supply whether needed or not.
- 4.8 At some point, potentially after several changes in Government, but importantly before the expiry of this development plan, the development industry may place even greater emphasis on brown field ahead of green field or on changing the spatial allocation of land on a more regional basis. As a result, housing numbers could be revised further downward, or pushed harder to areas closer to conurbations or with better existing infrastructure and facilities such as work-places, schools, leisure facilities, highways infrastructure, health care facilities or other community resources all lacking in the Winchfield area. If the Council pre-judge both the level of demand and the nature of land required now for the land supply 15 years hence then they will be planning for a future that has not yet come about and a need that has not been

tested. Predictions in demographics, energy planning, transportation planning over such time periods are wholly unrealistic and yet this council is seeking to jump the gun and predict requirements now that cannot be foreseen and doing it in a way that will ensure that development in this location, on green-field land starts before a need for it can be shown and becomes the focus of very significant pressure from the housebuilding industry.

Why there is no need for this allocation.

- 4.9 The NPPF and Government policy guidance requires that Councils in preparing their development plans promote sufficient land to meet a five-year housing land supply and that local plans identify how the need for housing will be met for the duration of the plan period, in the case of Hart to 2032. The Government has also published a methodology that identifies how the supply numbers are to be calculated using a standard methodology. The housing land supply for Hart using the standard methodology is a total of 292 properties per year from 2016 to 2032 or a total of 4672 homes. This includes a 40% cap on the growth in total numbers above projected household growth for the period in line with the Government's advice on methodology. Hart therefore could set a housing target of 4672 homes or 292 units per year.
- 4.10 This would be a defensible number and sufficient to give the Council comfort at any planning inquiry into residential developments on unallocated sites. The Government methodology takes into account projected population increases, trends in household formation, demand for housing locally and house prices. In many Districts where the standard method was introduced, housing numbers were projected to increase. In Hart the application of the standard approach led to a decrease in the number of homes required. Appendix 2 to the draft plan sets out the Council's approach to housing numbers.
- 4.11 The document argues that the 40% cap on projected household growth may not be upheld and have set it aside. Removing the cap leads to an annual supply requirement of 310 units per year or a total of 4960 housing units. This would give a robust figure, above the supply required using the Governments recent, up to date and unchallenged methodology. Such a move could have been justified up until the publication of the revised NPPF. But the revised NPPF retains the 40% cap and it is unlikely now to be challenged or removed. The 310 units per year number therefore exceeds the supply required under the standard methodology. Hart have gone further however. In another adjustment to the standard methodology the Council have added a 25% uplift taking the requirement to 388 homes per year or a total of 6208 homes for the plan period. The Council claim that this 25% uplift is to allow a contingency should the methodology change. The methodology was only set out by Government in 2017. Is up to date and well supported. It will not change before the Inquiry into the Local Plan is heard later in 2018. The footnotes allude to a vague potential increase in housing numbers nationally of 13% that was not followed up in the publication of the NPPF draft and supporting documents. In any case a notional 13% uplift cannot justify the 25% applied by the Council.

- 4.12 A second contingency allowing for changes to the inputs in terms of housing costs and projections is also included. The Council cannot anticipate these ahead of time and over the short time frame to the examination in public the caution is transparently unnecessary.
- 4.13 The Council in a third bullet point to appendix 2 claim the need for some degree of flexibility for non-delivery or delayed delivery dates. Such an approach is mooted in the NPPF which suggests an allowance of 5% of the total in normal circumstances or up to 20% where persistent under-delivery is recorded. Hart have not under-delivered to date and have an identifiable supply to 2032 well beyond the 5-year requirement. Such a contingency again cannot justify the 25% uplift.
- 4.14 In the fourth bullet point the Council claim the benefits of boosting housing delivery including the supply of affordable housing. On the face of it this is a legitimate concern but, where it is conflated with development of greenfield land the loss of such land needs to be weighed in the balance. If the sites identified as a result of the over-cautious approach of the Council were brownfield, then I think we could agree that the benefits of boosting housing supply would be positive but in this case and in this District, where the identified need is already met, those benefits need to be considered against the clear harm caused by the incursion of development into the countryside and the loss of green field sites.
- 4.15 Finally the Council identify that the housing numbers have been increased because they already have a significant supply of housing identified through the Hartland Village allocation and existing consents. This position does not justify building additional housing, beyond identified need, especially on green field sites.
- 4.16 In summary the housing numbers simply do not add up. The Council have been tasked with providing 292 units per year through the standard methodology. Setting aside common safeguards and the policies of the NPPF they have identified a supply of 388 units per year or a total of 6208 homes to 2032, an increase above what is required of 32% or 1362 units, close to the total for another new settlement.
- 4.17 It doesn't end here however. If one continues interrogating appendix 2 one can see other elements of gerrymandering with the figures. Within Hart some 327 residential units have been planned through the application of permitted development rights to change the use of offices. The Council is using the SANG restriction to prevent these units from coming forward, by refusing to release SANG land to match that required to support these new units. The Council is effectively thwarting the application of Government Policy in terms of freeing up under-utilised employment land and re-using brownfield land and at the same time reducing the housing land supply. These units if properly accounted for would bring the oversupply against the standard methodology to 1689 units. More than the allocation of land at Hartland Park or indeed the notional capacity of the new settlement at Murrell Green/Winchfield.
- 4.18 One final addition to the supply side can also be made. The Council's numbers according to their assessment of sites available and allocated up to 2032 will permit the construction of 6346 houses, an additional 138 ahead of the notional requirement

identified in appendix 2 giving a grand total oversupply of 1827 or 39% ahead of the required number from the standard methodology.

- 4.19 The Government is clear that Councils can “*put forward proposals that lead to a local housing need above that given by our (DCLG) proposed approach*”. The need for the additional housing however, rather than coming as a result of hedging the numbers game should be promoted as a part of coherent strategy linked to the delivery of an infrastructure project or increased employment ambition. No clear case for over-delivering on housing numbers is given in the draft Hart Plan and at no time have the Council consulted their residents on over-delivering. Quite the contrary, all consultations with the public have been based on the need to deliver particular numbers, beyond the requirement, and the consultation has been about how these numbers can be met- not whether they should be in the plan at all.
- 4.20 We must then relate the above to the allocation for a new settlement at Murrell Green / Winchfield. There is none. There is no connection. The Council concede at footnote 7 below policy SS1 that the new settlement at Winchfield/Murrell Green is not required to meet the housing needs identified in this plan. Clearly not. If the Council stuck to the standard methodology they have sufficient housing identified for this plan period and indeed the first 6 years (to 2038) of the next one (assuming that need, demand, and population growth hold up at current levels which is a moot point in any event).

Why An Allocation at Winchfield/Murrell Green is the Wrong Solution

- 4.21 Hart is a small district in Hampshire with few large conurbations or urban areas. The main centre and town in the district is Fleet, a settlement of 38,000 population sitting to the north-east of the district and close to the similar-sized towns of Aldershot, Farnborough, Farnham and Camberley. Fleet as a town is developed to a remarkably low density. Very few buildings are more than two storeys and the town centre is long and linear with many sites divided between commercial development and surface car parking. Residential properties tend to be fairly large and no more than two storeys comprising many detached and semi-detached houses. New housing tends to be of a similar form. The draft plan acknowledges the low density nature of Hart’s settlements and the historic propensity for green field development at paragraph 41.
- 4.22 The Council actively discourage higher density development, and this has limited the scope for housing development particularly on windfall sites. Policies designed to prevent increasing densities are couched in terms of resisting back-land development, preventing garden development or maintaining the existing spatial character of an area.
- 4.23 Further policies prevent the change of use of brownfield sites to housing on a pretext of needs for employment uses, retail and town centre uses and offices. All such policies deliberately constrain the redevelopment of existing residential sites, limit the scope for development within the urban area and stifle land values maintaining the

lowest density of development for a town of this size anywhere in the UK (Fleet* See appendix 2) .

- 4.24 These policies are formulated not simply for planning ends but are politically-motivated. They reduce the pressure on sites in the existing urban areas protecting existing residents to a degree that goes beyond normal planning considerations and creates a necessity for green field development. This green field development is then promoted in parts of the District where there are fewer residents and indeed fewer elected Councillors and fewer voters. An article by the leader of the CCH group on the Council neatly identifies their ethos and approach (appendix 3). In this way Hart takes the pressure for new housing away from the existing residents and seeks to meet it in unsustainable green field locations.
- 4.25 The NPPF is clear however, brownfield should come before green field, urban development should come before development in the countryside and developments should be located in sustainable locations that benefit from existing infrastructure. The principal argument of the RHA is that the Council is seeking to satisfy the identified housing need in the district (and indeed for more) in a way that is incompatible with the NPPF and good town planning; that ignores the opportunity for more and greater levels of development within existing urban areas; and development that will simply create demand for duplicate public, social, health, transportation, employment and education facilities in a location currently bereft of them. This is done in order to sidestep the need to increase urban densities in Fleet itself. Planning is not supposed to be a political activity but one done objectively and in line with a set of rules laid out in Government policy. That is not the case in respect of this allocation.
- 4.26 The emerging local plan is almost silent on Fleet town centre. The most important centre in the district warrants only six paragraphs (242-247) reflecting the political view that the town is full, unable to compete and offers no development opportunities. It is identified in the retail hierarchy as the main centre in the district, the most important for employment, retailing, service provision and entertainment provision. There is a short review of its function, no assessment of its health and no promotion of a strategy or plan for its development, regeneration or enhancement. Paragraph 243 suggests that the policy to regenerate the centre encompassed in the plan amounts to no more than:
- “Support to improve the range and quality of shopping and leisure facilities within Fleet town centre will enable it to compete more effectively with surrounding towns”*
- 4.27 A vague reference at paragraph 247 suggests a DPD on the primary shopping area. Worse still the paragraph on the retail hierarchy at 236 surrenders Fleet to a bleak future as “a centre that cannot compete with surrounding towns” (albeit that all are of similar size). The lack of ambition for Fleet is telling and shocking in equal measure. Our own assessment of its health suggests a centre in some degree of decline, moving from a second tier centre into the third tier and possibly beyond. Whilst vacancies are light they still fall ahead of the national average and whilst occupancy levels have been maintained over time, the quality of representation has declined significantly. Fleet needs regeneration and the plan, despite including site allocations, finds none in the town centre and does nothing to address the centre’s decline. In this regard the plan is incomplete. This reflects in part the political will

identified in paragraph 4.25 above. It appears easier to do nothing or resignedly accept the centre's growing irrelevance to the wider hierarchy. This approach ignores Fleet's great potential and provides the second plank to our concerns over the allocation of a new settlement at Murrell Green/Winchfield.

- 4.28 It is our contention that the Council have not looked at Fleet as a potential resource. They have not reviewed the availability of brownfield land in the town or thought through a strategy of how the centre can be enhanced and how investment can be brought back to Fleet. The Council have not considered how regeneration could address not only the viability of the centre but also the perceived shortfall in brownfield land to the extent that Hart feel it appropriate to make large green field allocations to meet their housing need.
- 4.29 The principal driver of investment in Hart District is residential development. This supports some of the highest property prices in the UK and makes Hart a desirable location for residential developers of every stripe. This inevitably has led to pressure for redevelopment in the urban area and in the surrounding green fields. The Council's response has been to shut down the avenues for development within the urban area and to resist the residential use of other land uses. Mixed use development is not mentioned in the plan in relation to Fleet town centre (or indeed anywhere else) and yet we have two issues; a supposed shortfall of brownfield land for housing such that the Council consider it necessary to allocate a new settlement in the countryside to accommodate 1500 houses and a declining town centre that cannot compete (in the view of the Council) with neighbouring towns. And yet this is a centre that has plentiful opportunities for redevelopment.
- 4.30 The pragmatic solution to both of these problems is to support mixed use redevelopment in and around Fleet town centre, to support the change of use of moribund office space into residential units, and to use the demand for housing as a lever to secure investment in the town bringing with it growth and regeneration to revitalise the existing retail core and revive flagging businesses and the evening economy.
- 4.31 Lambert Smith Hampton have reviewed Fleet town centre carefully and identified a range of sites that could come forward for mixed use redevelopment. We have identified a range of opportunities (see plan at appendix 1) and applied a density range for development (based on existing schemes in the centre) to test how many residential units could be delivered through the redevelopment of these sites. This exercise is embryonic in scope but has identified the potential for nearly 1000 units in the town centre area alone. This is more than half of the requirement intended to be met at Murrell Green/Winchfield. The table below identifies the sites, the density for development and the units that can be created. The majority of these sites include retail uses or car parking at ground floor with flats, maisonettes or town-houses above.

Ref Number	Site	Potential Units	Comments	Running Total
1	140-150 Fleet Road, Fleet	150	3-4 storeys. Currently car parking will need re-provision.	150
2	Hart Shopping Centre	600	6/7 Storeys, retail at ground, parking basement, residential over.	750
3	Victoria Road Car Park	58	3-4 Storeys, Car parking underneath	808
4		55	3 Storeys	863
5	Travis Perkins	55	3 storeys	918
6	Corner Albert Street and Fleet Road	12	3 storey. Identified in SCHLAA	930
7	Admiral House	20	3 storey, site identified in SCHLAA	950
8	Lismoyne Hotel	40	3 storey, site identified in SCHLAA	990

4.32 The sites identified include the existing Hart Centre, existing office spaces and some alternative uses. In each case existing uses could be replaced on site alongside new housing simply through increasing residential/development densities or reworking layouts and existing development. The largest site is the Hart Centre and the Council need to consider the future of this asset properly. It currently anchors the town centre and the Waitrose represents the town's main food outlet. But it sits in a centre that is visibly declining. Multiple retailers are retreating and being replaced with poorly covenanted alternatives if not lying empty. Much of the space is difficult to let and the centre is losing its attraction. With fewer retailers the centre attracts fewer visitors and this is the start of a spiral of decline. With fewer traders and less revenue from the car park the service charges for units

will continue to rise, again dissuading new occupiers and leading to more vacancies. Ultimately Waitrose will withdraw and the centre will fail without a serious intervention.

- 4.33 Waitrose would seek to remain in the centre and the re-provision of a new store of an appropriate size to meet their current needs would be welcomed by the retailer who would wish to retain a significant presence in the town. Similarly Sainsbury would sensibly participate in reworking their presence in Fleet to realise more from their existing land asset. All of the major food retailers in the UK are currently working on getting more from their existing estate rather than developing new stores. Their estates strategies recognise that many of their sites are underutilised and can generate returns from development whilst also delivering more modern stores. Fleet is a prime example of where the existing retail spaces and car parks can be reworked to deliver more.
- 4.34 The LSH national retail agency team have been asked to consider Fleet as a shopping centre and to comment on future retail investment here. I set out their comments below:

“From a retail perspective Fleet town centre offers localised retail facilities. The primary area of Fleet Road is reasonably robust but the Hart Shopping Centre which was opened in 1989 is looking dated. It has large basement areas no longer required by modern retailers and has reportedly a high service charge level. There are currently ten retail units as listed as being available on the Co Star database (which is high) and the former Woolworths store in the scheme was vacant for a number of years before being leased in 2017 to M&Co.

Basingstoke to the west and Guildford to the east are strong regional shopping centres which attract comparison consumers from the immediate Fleet catchment via the quick linkages to the M3. To the north east The Lexicon Shopping Centre, Bracknell has now opened offering modern retail facilities with anchor stores including Fenwicks, M&S, Primark, Next and H&M along with a 1,300 space multi storey car park. The Bracknell Regeneration Partnership has reportedly invested circa £240m into the town centre creating an extremely attractive retail environment.

Another major retail and leisure scheme within the region is the recently announced £200m redevelopment of Basingstoke Leisure Park by the Council and New River Retail which is to include state of the art leisure facilities and a designer shopping village.

As has been widely reported the growth of online retail sales is having a major impact on the retail landscape – online sales are currently circa 16% of all UK sales and growing annually. There is a fundamental structural change in our shopping habits which in turn is having a major impact on retailers and town centres. The retail centres that are thriving tend to be those regional locations offering a high quality experiential mix of retail and leisure or the smaller centres that are able to provide easily accessed, convenience retail facilities in an aesthetically pleasing environment.

Interestingly, we have started to witness retail assets (shopping centres and retail parks) particularly in the South East being acquired or redeveloped for their

residential potential. In some instances, we are seeing retail being proposed above shopping centres and in other instances the complete redevelopment for residential – examples include Forbury Park in Reading which has consent for 765 homes and Whitley’s Shopping Centre in Bayswater which is to be redeveloped for a mixed retail and residential scheme. This trend is likely to continue especially in areas where residential values are high and the retail assets are stagnating.

The Hart Shopping Centre could offer such potential in the future – retaining strong convenience retail facilities at ground floor level with retailers such as Waitrose but with residential accommodation on the upper parts.

What is clear, is that on a national basis we have too many shops and alternative uses, in particular residential, is a desirable way of regenerating our town centres”.

Sean Prigmore, Retail Director, Lambert Smith Hampton

- 4.35 This advice should be contrasted with the advice in paragraph 66 of the plan which identifies that comparison retailing will “*be the driver of growth*” in Fleet.
- 4.36 In discussion with our retail experts we have identified a potential redevelopment of the centre as the only realistic option to avoid further decline. Driven by the buoyant house prices in Hart a redevelopment of the centre to provide a mixed use scheme with houses and flats above retail and car parking at ground and first floor can provide a viable alternative. Introduction of a small boutique cinema (3 screens) and some additional restaurant/ food and beverage units to support the cinema could complete the scheme and lead to a major re-ordering and restructuring of the town centre. The additional residents, their spending, and the impact of an investment on this scale in Fleet will encourage other sites around the town centre to come forward. Developments such as this however cannot come forward in a policy vacuum. The Council need to create the positive framework for investment and development that will encourage and re-energise land-owners in Fleet to step up and invest to halt the decline the centre has seen. This is the reverse of the Council’s defeatist approach currently set out in the local plan which fails to recognise the potential and misses the opportunity to harness the value of the residential market in the area to regenerate the town centre.
- 4.37 In addition to the redevelopment of retail facilities in the town, the approach also considers the reuse or redevelopment of employment and office sites within the town centre. Our review of the local office markets led from our local office in Guildford suggests that the local office market is moribund. I set out below the advice from our Guildford head of office regarding offices in Fleet:

“I have been actively involved in the Fleet office market for more than 30 years. My activity has included; the 60,000 sq ft, three building Fleetwood Park, Ancells Business Park (ABP) for MEPC and subsequent owners/occupiers; the sale of the

25,000 sq ft Automation House (ABP) for Festo; the lettings of 16,000 sq ft Beech House and the 16,000 sq ft Cedar House (both ABP) on a number of occasions; and the 24,000 sq ft Linea (ABP) for Kingsbridge Estates. LSH is currently marketing office space in Beech house and Linea.

The office market in Fleet has been in decline for a number of years as larger corporates have vacated to consolidate occupation in larger centers and locations benefitting from more amenity – such as Farnborough Business Park. Key business centres such as Reading and Basingstoke have prospered whilst the smaller satellite office location such as Fleet are finding it harder to prove their relevance as office locations. Sun Park, 285,000 sq ft of offices on a campus site has now been vacant for many years and what is now called M3 HQ. 70,000 sq ft on ABP is suffering the same fate – neither are likely to be occupied as offices again. There is the potential to enable redevelopment of larger unwanted office stock for residential and to focus B1 provision in locations better served by public transport and amenity and in buildings which will allow business space for the SME sector where what demand there is lies.”

Paul Dowson , director of LSH.

- 4.38 This advice should also be considered when reviewing the Council’s decision to discount the permissions granted under prior notifications for change of use from office to residential. Some 327 units across Hart are being thwarted by the Council’s refusal to release SANG land to support these developments. These developments have come forward as a result of a Government initiative to ensure the re-use of redundant and empty office stock in line with the underlying principal of making the best use of urban brownfield land. It is clear that the office market in Fleet has declined and that the units created in this way can contribute toward the provision of housing. The Council’s approach however would rather see these buildings remain empty and the potential for houses delivered on green field sites.
- 4.39 In summary, the potential exists in Fleet town centre to deliver nearly 1000 new homes from redeveloping brownfield sites. Promoting such a strategy negates the need for a new settlement in the future and will also deliver the investment needed and the positive development environment necessary to achieve the regeneration of the town centre. Regeneration does not work where it tries to recreate opportunities in an area that the market has rejected. The office and retail markets for Fleet are not going to come back. The strongest development market in the town is for residential and this can be used as the engine for change and regeneration. The Council recognize at paragraph 40 of the draft plan that property values are very high. The pent-up demand and exceptional residential values can be harnessed to deliver the required regeneration. The Hart District Plan should recognize this and create a positive environment for investment in the centre to deliver the housing and satisfy the need for regeneration. Hart’s draft Local Plan, by being defeatist about Fleet, by blocking SANG provision for office to residential conversions and by the advocacy of an unnecessary new settlement is doing everything possible to prevent Fleet from becoming a commercially successful and vibrant town.

Is School/Education infrastructure driving the new settlement?

- 4.40 Hart District Council appear fixated on delivering a new school through the development of the proposed new settlement. At paragraph 21 of the document Hart acknowledge that the plan as proposed should be in accord with Hampshire County Council's plans and strategies. At paragraph 77 it is suggested that Hart work closely with HCC in relation to planning for and providing new schools. Paragraphs 74 to 77 of the plan discuss schools provision in the district. It is not stated here that a new school is required. HCC are responsible for schools provision and planning. Hampshire County Council have consistently commented that a new secondary school is not required. (See appendix 4).
- 4.41 A new secondary school for Hart is mentioned in the draft planning policy document both as part of the vision (paragraphs 93 points 3 and 7) and in the objectives (paragraph 94 objectives 3 and 8) always in connection with the new settlement. The size of the new settlement has been framed to ensure that it can deliver the numbers of pupils and the funding support to provide a new school (paras 104 and 147). The phasing of the new settlement, with development allowed to start in the mid-plan period (despite the housing not being required) is also set up to deliver the new school early (paragraph 147). It appears that the new secondary school desired by Hart but not by HCC is driving both the size of the new settlement and the phasing of its development. One may also infer that the need for a new school is fundamental to the selection of the location.

5.0 CONCLUSIONS

5.1 In the context set out above, we conclude that the plan could be made sound with the removal of Policy SS3 which allocates a new settlement at the Murrell Green/Winchfield Area of Search. The creation of a new settlement at Murrell Green/Winchfield, is considered premature in terms of housing numbers, inappropriate in terms of need and the sequential approach that must favour brownfield ahead of green field development and unnecessary in terms of the availability of sites elsewhere on which additional housing need can be met. The Plan should better focus on the regeneration of Fleet Town Centre within which there are significant opportunities for redevelopment to provide the housing numbers that render the need for a new settlement elsewhere obsolete.

5.2 The plan itself sets out the tests for the soundness of a policy document at paragraph 11 and asks a number of questions of the plan and its preparation. In answer to the first bullet point, has the Council followed the correct procedure, our answer would be no. The Council have failed to properly consult on the draft plan by posing the wrong questions. The Council have consistently sought to satisfy a housing demand far greater than the actual need identified by application of the standard methodology and whilst this methodology changed only late last year (2017) it has crystallised what new housing is required. The Council have aimed far higher than this (39% beyond the appropriate numbers) but the Council's consultation has only been upon the basis that the higher number of houses is the actual requirement. The consultation then focused on where to locate the exaggerated housing need either through provision of a new settlement or on urban extensions onto greenfield land. By the Council's own assessment the new settlement is not required in the current plan period. If appropriate numbers of housing are used as generated by the standard model, then the new settlement would not be needed until 2038 if at all.

5.3 The next questions deal with the test of soundness and here four questions are asked:

i) Has the plan been positively prepared ?

to which we would answer yes.

ii) Is the plan justified?

The answer here has to be no. The new settlement cannot be justified and is not required in the current plan period. The plan has failed to properly consider the opportunity presented by brownfield mixed use development to meet housing need in Fleet; the infrastructure required in the plan (a new secondary school) is not supported by HCC, the relevant authority on school provision; the phasing of development of a new settlement to begin in the mid plan period cannot be supported.

iii) Is the plan Effective?

To which our answer would be that it is practical and can deliver on joint working with neighbouring authorities.

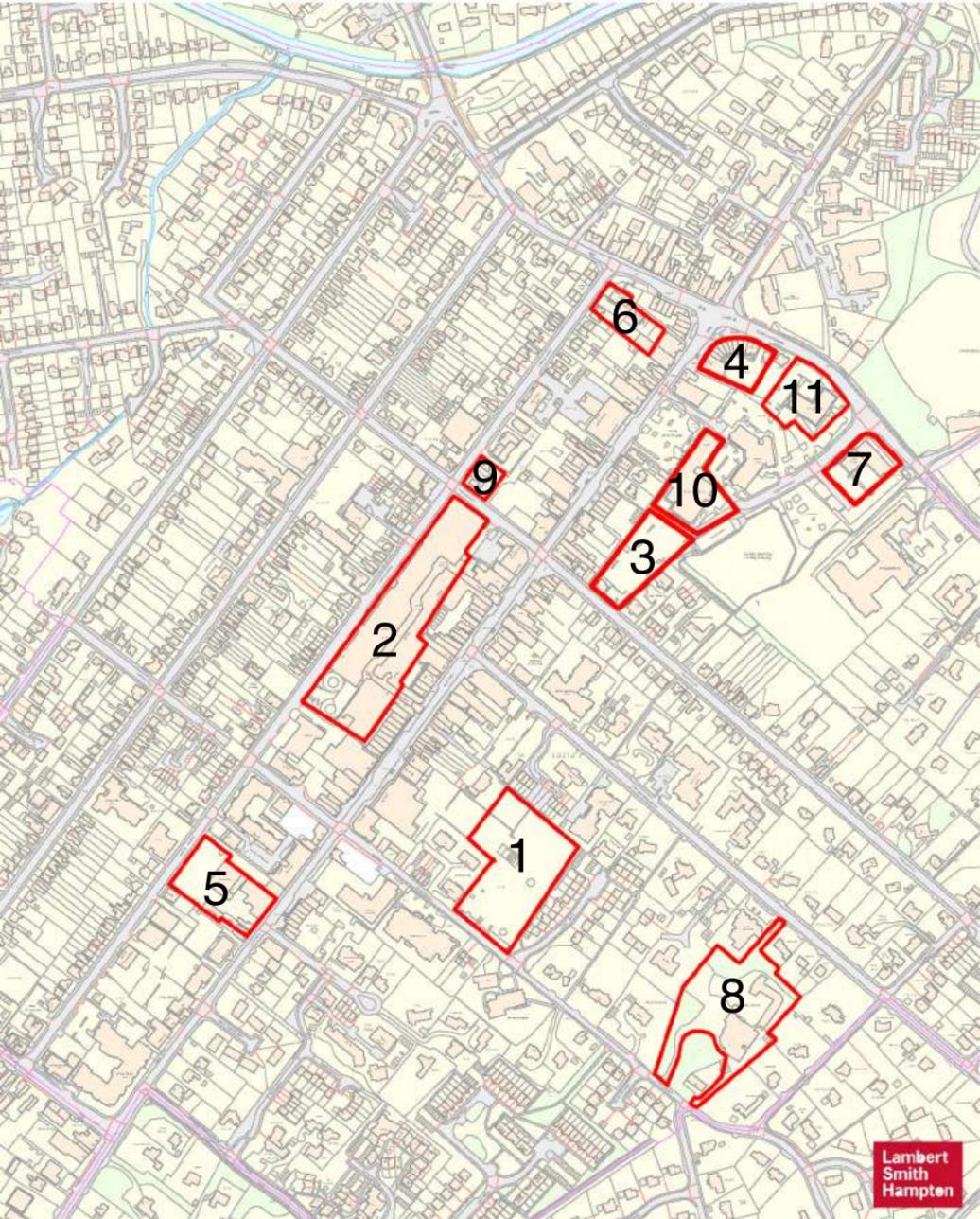
iv) Is the plan consistent with national policies?

Again the answer here has to be no. The Council have failed in their duty to identify and prioritise the development of brownfield land and have directed development to green field sites without any proper audit of brownfield opportunities. LSH have identified the potential for up to 1000 units in Fleet town centre and have yet to review capacity in other urban centres.

The Council have also failed to pursue or identify a strategy for the regeneration of Fleet town centre contrary to the advice of the NPPF at delivering plans that aim to support the vitality and viability of existing urban centres.

- 5.4 We consider that the Hart Local Plan can stand without the new settlement allocation and therefore request that Policy SS3 be removed and Policy SS1 updated to reflect this.
- 5.5 We would be grateful if you could acknowledge receipt of this representation and we reserve the right to supplement these comments at a later date.
- 5.6 This evidence has been completed by Mark Dodds BA (hons) BTP National Head of Division, Planning and Development Consultancy at Lambert Smith Hampton.

Appendix 1 - Development sites in Fleet



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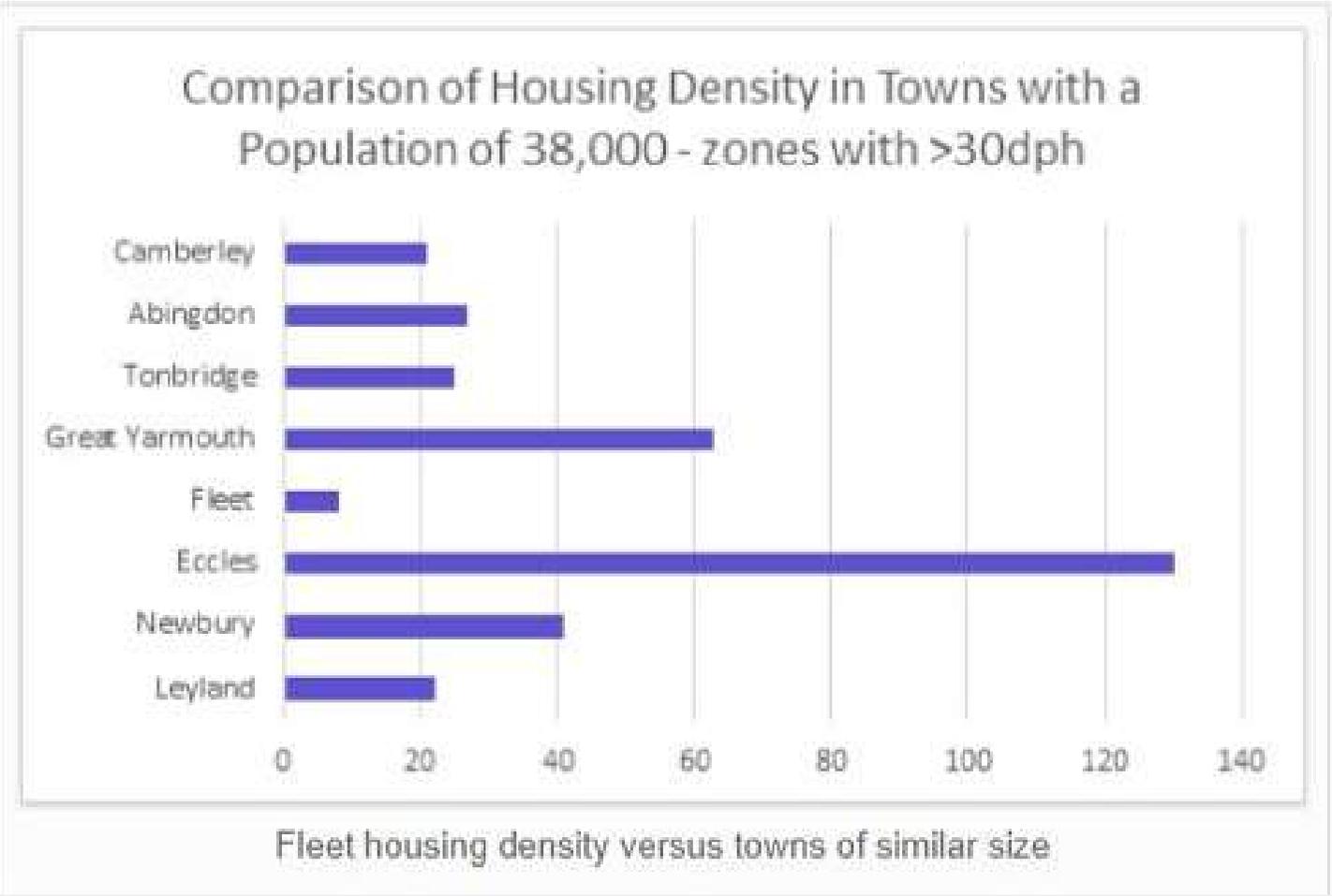
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Appendix 2 - Fleet development density

Fleet is the lowest density town of its size in the country. The chart below that there is significant scope for increasing development density in Fleet.



Appendix 3 - Commentary on development in Fleet by CCH

A new settlement is an attractive proposition

THERE has been much written about Hart's Local Plan and in particular its inclusion of a new settlement.

It is widely accepted that the UK is suffering from a housing crisis and the government is looking for local councils to plan effectively to address this need.

While brownfield developments are naturally the preferred approach, Hart does not have the same level of available land ripe for regeneration that you might expect to find in a large inner city.

Where we do have large brownfield sites, such as Hartland Park, the site clearance and decontamination costs badly impact the level of infrastructure which can be provided. In the case of Hartland Park, the developer cannot come close to providing the 40% affordable housing the district badly needs.

If we are to build houses that local people can afford to live in, we do need to build the full quota of 40% affordable housing. Otherwise, what is the point of building yet more houses if they don't address the local need?

A new settlement is therefore attractive. It can be properly planned and integrated into the road network and it can deliver 40% affordable housing.

Equally importantly, it has the scale to supply the site for the much-needed new secondary school.

Calthorpe Park is already being cited to expand to 1,670 pupils and even then, we will not have enough places for the pupils who will need to be educated in Hart.

A new settlement brings the critical mass of pupils that enables Hampshire County Council to justify the building of a new secondary school.

The alternative, which is to disperse the new housing around the edge of the existing urban area, just doesn't do that.

Those with vested interests in opposing the new settlement would rather us intensify the housing density in Fleet. We Heart Hart are predominantly a Winchfield-based protest group which is very vocal in calling for the 'rejuvenating' of Fleet. But they really mean bulldoze the quintessential character out of the town and replace it with high-density urban flats.

What is needed to enliven Fleet as a retail town is to increase footfall.

Although it is proving controversial, Fleet Town Council's plans to build a new arts venue is worthy of careful consideration in this regard.

There are some legitimate concerns being raised - for instance, the Community Campaign group (the residents' association with 10 representatives on Hart District Council) would adamantly oppose using The Views for additional parking places.

If the people of Fleet decide to go ahead with the new build (and it is ultimately their decision), then I am sure the district council can find additional car parking spaces if proven to be required elsewhere - so no parking would be needed on The Views.

While some criticise Fleet Town Council for proposing change, it is at least being bold enough to come up with a way of addressing the need to keep Fleet relevant as a preferred destination in the 21st century.

The council therefore at least deserves to be listened to with an open mind.



James Radley
Community Campaign (Hart) leader



If we are to build houses that local people can afford to live in, we do need to build the full quota of 40% affordable housing

Expansion is already planned for Calthorpe Park School but even then, we will not



COUNCILLOR Alan Oliver now claims that the plan to build on the Gurkha Square car park is evidence of regeneration in Fleet.

That is an extremely rose-tinted view.

The Fleet Town Council plan for a new building is entirely dependent on loans from public bodies, on favourable valuations by Hart District Council, and on Fleet council tax payers repaying those loans and the on-going losses for more than 40 years.

There is no housing and no commercial space in the plan, and not only would we lose the use of Gurkha Square car park, we may well see The Views being threatened.

Do Fleet council tax payers realise that 750 people chose the 'Redevelop' option in the consultation, with the consequence that we'll be paying for a very long time?

Also, given the tax increases that would arise from any further cost over-runs, is it not time for Fleet Town Council to put the facts to the electorate?

TIMOTHY SMART
Fleet, via email

Keeping pace with number of pupils

HAMPSHIRE County Council (HCC) has once again been able to offer nearly every parent a place for their child at their preferred choice secondary school.

Of the parents applying for a September 2018, Year 7 place at a Hampshire secondary school, 98% have been offered a school of their choice - with more children (over 92%) being allocated a place at their preferred first choice school.

We have been able to offer a very high number of pupils a place at their preferred secondary school.

Considering the size of Hampshire and number of students to accommodate, this is a sizeable achievement.

Thanks to our strong track record in planning for the future and our sustained investment in school expansions and new schools, we are ensuring that we can provide a school place for every child in Hampshire.

I am pleased to say, we are keeping pace with the

on-time applications this year, up by 428 from last year. Pupils who did not secure a place at one of their chosen schools have been allocated a place at a school near to where they live, with available spaces.

Parents have the right to appeal in these situations and their child's name will be added to the waiting list for their preferred schools.

Places do become available if parents change their mind, or families move home.

I understand there will be some disappointment for those parents who did not secure a place at one of their chosen schools, but every child whose parents applied for a place at a Hampshire secondary school, has been offered one.

There are always individual schools with exceptionally high demand, which is a credit to the high standard of teaching at these schools.

The admissions team is now busy processing primary school applications with offers due to go out to parents on April 16.

CLLR KEITH MANS
HCC's executive lead

Appendix 4 - Commentary on a new school requirement for Fleet

Secondary school unnecessary and not in a suitable location

A number of councillors have made a fuss about a new settlement bringing a new secondary school. The trouble with this is that they have yet to provide a shred of evidence that a new secondary school is in fact required.

Back in [2015](#), Hampshire's forecast went as far as 2018 and they were predicting a surplus of places up to 2018. They also forecast a falling birth rate and a significant number of existing pupils attending Hart schools from outside the district.

In [2017](#), [HCC published](#) a new school place plan that showed an overall surplus of places in both secondary and primary schools up to 2021.

A recent letter from a Hampshire Councillor shows that 98% of Hampshire secondary pupils have been allocated a place at a school of their choice for the next academic year.

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So, having established that a new school is probably not required, we must now address the proposals that have been put forward