**Comments on the draft paper “Refining our options for delivering new homes” to be presented to Cabinet on 18th November 2015.**

**From Winchfield Action Group and We Heart Hart**

The Options Paper you plan to present to the public for consultation contains the following fundamental flaws:

**General**

You have not given clear instructions to the consultees. The consultation in 2014 resulted in 684 responses 19.5% of which were discounted as the paper had not been correctly completed. 550 were correctly completed and used for analysis. This options paper is even more complicated and you must give clear guidelines e.g.:

1. If all questions are not answered will the entire paper be discounted? ( if not why not? )
2. Preferences must be shown using 1, 2 and 3 to rank preferences where 1 = most preferred, if this is not done the response will be discounted.
3. If a question does not have clearly defined options but just asks for views or comments will it be discounted if not completed?

Although it has been pointed out on several occasions by Councillors and by us the maps do not show the extent of development at St Marys Hartley Wintney, Edenbrook or the other developments noted on page 14, item #26 and #27, either completed or with planning approval granted.

To correspond with the tables of data you provide, all maps must show visual representation of any of the site applications approved at the time the Options paper is printed. The maps and tables must use the same criteria; they are otherwise misleading to the public.

All maps should show the Parish Boundaries to help readers understand the context of where development is planned and how it will affect them wherever they live in Hart.

Why have you only assumed 30dph when calculating the development capacity for Fleet which is defined as an urban area and where density can be significantly higher, particularly where commercial use is changed to residential? Have you given serious consideration to Fleet Future’s suggestion that you could redevelop HDC offices, Harlington centre, Flagship House and Admiral House?

Brownfield sites – we continue to believe that your assessments of developable brownfield sites and/or the dph which can be achieved on such sites is too low and this therefore impacts all your numbers.

The SHMA is currently being revised and likely to reduce the housing need. An independent expert, Alan Wenban-Smith, has reviewed the housing needs assessment and concluded that Hart District is being asked to build too many houses.  He says that the overall house-building rate for Hart should fall from 370 to 268 dwellings per annum.  Given that Wessex Economics are reviewing the SHMA and that the Joint CEO only last week agreed that this report required further analysis must call into question the validity of carrying out a new Housing Options consultation now when there is serious doubt about the accuracy of the housing numbers that need to be delivered.

**Specific**

Page 7

Regarding the October 2014 consultation your statement is misleading.

 "We received 684 responses to our consultation, which have helped us refine our new home distribution options. This statement is misleading as you clearly state in the summary of responses that the results were derived from 550 correctly completed response forms.

In summary the key points were:

• When asked for everyone’s preference for the options for growth, Option 1 (within settlements) and Option 4 (new settlement) emerged as the two most preferred options. They were followed by Option 3 (strategic urban extensions), Option 2 (Dispersal) and Option 5 (SPA avoidance) in that order."

This gives the impression that there was strong support for the new town.  In fact, the results of the consultation given by Hart were as follows (each score with a weighting given by Hart):

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | Opt 1 | Opt 2 | Opt 3 | Opt 4 | Opt 5 |  |
|  | Score | Score | Score | Score | Score |  |
| Rank | Count | Count | Count | Count | Count |  |
| 1st | 640 | 320 | 515 | 1010 | 265 |  |
| 2nd | 564 | 344 | 592 | 352 | 348 |  |
| 3rd | 381 | 495 | 399 | 138 | 237 |  |
| 4th | 180 | 336 | 180 | 198 | 206 |  |
| 5th | 64 | 67 | 76 | 115 | 228 |  |
| Total | 1829 | 1562 | 1762 | 1813 | 1284 | 8250 |
|  | 22% | 19% | 21% | 22% | 16% | 100% |

The table shows there were no clear preferences, with the top four scoring between 19% and 22%.  The new town scored 22% out of 100% which is hardly a "preferred option", compared to 42% favouring collectively Options 1 to 3, ie not a new settlement.

Unlike the previous consultation this paper does not mention urban development at all? There are submitted sites, in addition to brownfield sites, which would contribute to the overall numbers so why have most of these been discounted as ‘no further assessment’

Page 7#9.

The consultation of 2014 specifically asked if even the smallest villages and hamlets should provide some housing and there was strong support that they should do so, 60% of respondents said yes. . Why has this been ignored in this options paper?

Pages 8 & 9

Infrastructure testing: transport/education/health/utilities – initial findings should be included here. By now HDC must have been able to determine the high level costs of infrastructure for each option and have a good idea of the contributions they can reasonably expect from developers. We have consistently said that HDC already has a deficit of £78m and that development costs of a new settlement will be in the region of £300m of which developer contributions might be £50m. On page 26 #46 you refer to the need for ‘robust infrastructure delivery’ so you should demonstrate that this is an obligatory requirement for any major development whether new settlement or greenfield extension; this is a major concern for Hart residents.

What evidence do you have to justify that ‘a significant increase in primary and secondary school places’ will require the building of new schools? Hampshire school place planning does not go beyond 2018 and there is currently forecast to be a surplus of school places against that plan.  Latest Government population projections show a much lower population in 2031 than before, so how do we know that our school place requirement will be so large we need to build these extra schools?

Page 10.

Why is ‘rural housing for local people’ information not included here? (HARAH) Add this to Q2

Page 13.

The duty to cooperate – this is mentioned throughout the document and you make reference to having challenged Rushmoor and Surrey Heath numbers. It is not clear to the public that the impact of having to meet their need – if that is the outcome – will not be until 2025 and that Hart will be building a new settlement to accommodate their unmet needs NOT because Hart needs it. You have a duty of care to help residents of Hart understand that if HDC builds a significant number of houses for Rushmoor and Surrey Heath in this plan period there will be no defence against taking all their ‘unmet need’ in future plans.

Residents of Hart should also understand that a new settlement of around 1500 - 2000 homes, which **might** be the Hart need by the end of the plan period, is ‘not sustainable ‘as it will not generate the new schools, health centres and other infrastructure that would be required.

It is vital that Hart residents are given sufficient facts before you can ask them if they do or do not want a new settlement in their District.

Page 17

To provide a complete picture you should show all SHLAA sites as submitted on this map (as in the SHLAA Site Shortlisting Outcomes paper’) regardless of their current status after assessment.

Page 20

The SPA map should also show the 5km zone of influence, this is shown on a later map but should be included in the constraints section of the document to inform reader conclusions.

Page 22 #42 and page 23, Q3

You ask the question whether the public agrees that the hierarchy is correct; we can find no reference to the acceptance of the hierarchy changes proposed in the 2010 document. If the changes were accepted then you must tell the public quite clearly that tier 5 villages – and you must list them by name - were excluded from any calculations for forward development planning on account of being too small and too rural to meet infrastructure needs or provide access without the use of a car.

Page 29

You show a table of dispersal sites which implies that Winchfield has not offered any sites. Once you have resolved the hierarchy question above you must either state that all tier 5 villages are not required to offer any as they are ‘not sustainable’ (as you have done for Heckfield) OR you must show the total number of new homes which could be realised from the Winchfield ‘candidate sites’

Also, Winchfield has put forward planning applications which were supported by WPC but were refused by HDC.

Page 31

‘Dispersal Opportunities’ the legend is incorrect, it is not just the main settlements and to provide an accurate picture to inform readers it should include the two Winchfield settlement boundaries, the village name ‘Winchfield’ and it should also show the Winchfield ‘opportunities’

Page 39.

The statement ‘the only location that is being brought forward as a deliverable option by developers for a new settlement is the area centred around Winchfield’ should state that the developer is Barratts. Given the issues at Barratts most recent development in the area, St Marys, the public has a right to know who the proposal has come from so that residents can judge if they think the developer is capable of providing the sort of development the district needs and could be proud of. Additionally the use of a single developer should be shown as a risk as this could well lead to substantially inflated cost implications and delivery delays.

"The presence of a railway station on the main line to Waterloo is an advantage for this location" is misleading since no detailed transport analysis (road or rail) has been done to assess the implications, positive or negative, of a new settlement at Winchfield. SWT have stated the line is operating at capacity.

"They may also have the advantage of taking development pressure off otherwise constrained existing settlements" implies that the additional road and rail traffic which will result from up to 5000 new houses will not impact the remainder of Hart. Residents, particularly in Hartley Wintney, Dogmersfield, Crookham Village, Fleet, Elvetham Heath, Odiham and North Warnborough, need to be fully informed.

Page 40.

The map ‘new settlement opportunity’ is misleading and should show

1. Parish boundaries
2. Dogmersfield and Crookham Village settlement boundaries and village names
3. Winchfield settlement boundaries
4. The size – to scale – of the proposed new settlement. it is impossible for anyone to understand from the current map the impact the new settlement would have on the surrounding area
5. Remove from the legend the descriptor ‘main settlements’

Page 41.

The new settlement disadvantages are deceptively understated.

Page 42.

The map shows SHLAA sites in Hook which are beyond the Winchfield Parish boundary, this is misleading

Pages 43 and 44

The use of ‘approaches ‘and ‘options’ is confusing and misleading. After reading all the detailed information provided each option should provide residents with a succinct overview of how many houses could be expected as a result.

A clearly defined objective of the overall need would be very helpful before they answer this important question which WILL affect everyone in Hart.

Since you have again stated (as you did in 2014) that only a combination of options will achieve a workable plan for the next 17 years then why ask Q4 and offer the three ‘approaches’ as individual choices?

Focus growth on a new settlement at Winchfield is not an ‘approach’ that can be offered on its own as it cannot provide any of the housing need for at least 10 years. It does not meet the criteria described on page 17 to be considered developable or deliverable.

The whole issue of Rushmoor and Surrey Heath overspills has such an important impact on the local plan (essentially whether or not a new town should be built) that the council should

delay the consultation until both Rushmoor's and Surrey Heath's requirements are known and validated and the SHMA updated.  These numbers are expected to be available early in 2016 so this might result in a delay of perhaps two months.

Q5 asks for ranked choices on four ‘options’ but the questions are blatantly biased so that however the scoring is done the ‘new settlement opportunity at Winchfield’ will have more than 50% of the awarded marks.

If you combine new settlement at Winchfield with expansion on the edge of settlements then the new settlement will not need to be 4000+ houses and therefore will not generate the necessary infrastructure contributions.

**Our suggestions for clearly defined questions which might result in usable responses on the options paper would be:**

After we have accounted for development on ‘brownfield land’ and on land not affected by the Special Protection Area exclusion zone, which of the options outlined in this document do you support to deliver Harts need for a further (insert correct final number) new homes by 2032? Please rank in order, 1,2,3,4 where 1 is the most preferred.

Option 1. Urban and greenfield development distributed throughout the district’s towns and villages, including the smallest villages and hamlets if suitable sites are submitted.

Option 2. Strategic greenfield expansion on the edge of one or more of the main settlements (options are Pale Lane, Elvetham Heath….. houses, land at Grove Farm, Hitches Lane, Crookham Village ……houses, Land to the west of Hook…..houses (insert achievable numbers)

Option 3. A combination of options 1&2

Option 4. In the event that Hart must meet some of the unmet needs from Rushmoor and Surrey Heath in the later part of the plan (2025 – 2032) a combination of options 1&2 and a new settlement.

**The SHLAA Site Shortlisting Outcomes Paper**

This document has little meaning without showing how many houses might be realised at each site; please show the ‘indicative housing capacity’ as in the options paper tables. You cannot ask residents to allocate sites when you have not provided sufficient detail for them to make an informed decision.

Also, you have not made clear whether completion of this section is obligatory or optional, if they fail to complete this will their answers to the ‘options’ paper be discounted?

**An additional issue**

We have requested that HDC support the assessment process to identify and adopt some new SINCs in Winchfield. Hart has refused to do this until the Local Plan is in place. There are some areas within SHLAA sites which would be wantonly destroyed if extensive development is approved without consultation with HCC and HBIC. We ask HDC to reconsider their answer, particularly with reference to areas within SHLAA 136, 184 and 186.