

Hart District Council Local Plan Strategy and Sites 2016 - 2032
Publication Stage Representation Form

Part B: Please use a separate sheet for each representation.

For example, if you wish to comment on more than one policy, please submit a separate Part B form for each policy.

Please refer to the guidance notes before completing Part B.

Name/ Organisation:

Postcode:

1. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

My representations relate to policies SD1, SSI, SS3, ED2, 4, 5 and 6, NBE2, II, and Para 297 related to SANGs

2. Do you consider the Local Plan is:

Please check as appropriate.

(1) Legally Compliant	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Compliant with the Duty to Cooperate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to cooperate, please use this box to set out your comments.

See below at Appendix A.

Continue on a separate sheet/scroll down box if necessary

4. Please set out what modification (s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you identified at question 3. above. (NB. Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

See below at Appendix A

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support or justify the representation and suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/ she identifies for examination.

5. If your representation is seeking a modification, do you consider it

necessary to participate at the oral part of the examination?

NO, I do not wish to participate at the oral examination

YES, I wish to participate at the oral examination

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

It is important that local people are heard at the examination and I don't believe my evidence has been repated elsewhere.

Continue on a separate sheet/scroll down box if necessary

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Appendix A

1. Introduction

My name is David Turver and I run a campaign group called We Heart Hart. There are currently 576 members of the Facebook group and 504 followers on Twitter. I support some development in Hart, but only that which is required to meet our housing needs, and strongly believe that our remaining housing needs can be met from brownfield sites alone. I strongly object to more unnecessary green field development.

My objective in this submission is to request for the Local Plan to be amended such that it is properly sound before submission, or failing that, for the Inspector to pass the plan with amendments. The main amendments I am seeking are:

- Removal of policy SS3 – New Settlement at Winchfield/Murrell Green
- Amendment of policy SS1 – Spatial Strategy
- Amendment of Policy ED4, ED5 and ED6 – related to Fleet town centre and other urban centres
- Amendment of NBE2 – Gaps between settlements
- Amendment of I1 – Infrastructure
- Amendment of policy ED2 and policies related to Para 297 – SANGS

I will make submissions on each of those points, however first it is important to deal with Legal Compliance issues.

2. Legal Compliance

This section splits into two parts. The first relates to the potential pre-determination of Winchfield/Murrell Green as a location for development and the second relates to the limited scope of the consultations that have been conducted compared to what local people should have been consulted about.

This analysis informs the reasoning behind challenging the policies above.

2.1. Pre-Determination of Winchfield/Murrell Green as a development location

2.1.1. November 2014

Back in 2014, HDC conducted a consultation on housing distribution. This was a non-site specific consultation, with no reference to Winchfield in the Housing Development Options Consultation paper. The council then moved with undue haste to put a paper to Cabinet on 6 November and Council on 27 November where Winchfield was identified as the only option to be tested for a new settlement.

This process was challenged at the time, by amongst others by Hartley Wintney Parish Council. See embedded attachment:



HWPC challenge to process

At the subsequent Cabinet and Council meetings, attempts were made to remove the words “at Winchfield” from the proposed Housing Distribution Strategy.

Recommended Preferred Housing Distribution Strategy, <u>subject to testing</u>:	
Development (including windfalls) <u>beyond</u> the SPA 5km zone of influence (this comprises the settlements of Odiham, North Warnborough, South Warnborough, Greywell, and Long Sutton)	150 – 200 dwellings
Development <u>within</u> existing settlement boundaries (including windfalls) from those settlements that lie <u>within</u> the SPA 5km zone of influence.	Approx 750 dwellings
Development <u>adjoining</u> settlements <u>within</u> the SPA 5km boundary zone of influence	100 – 650 dwellings
Strategic urban extensions (no individual site identified)	0 - 600 dwellings
New settlement at Winchfield	1,800 - 2,400 dwellings
	4,000 dwellings

It is important to note that the removal of these words would not have precluded the testing of Winchfield. They would merely have opened up the possibility of testing other sites. Failure to remove those words amounted to a strong signal that the council were not open to considering suitable alternatives. Indeed, there was no attempt to even identify suitable brownfield sites that might meet some or all of our housing requirement.

The minutes of both [Cabinet](#) and [Council](#) show that amendments intended to open up other sites for testing failed.

Much debate happened at council. One councillor remarked that the “only option is Winchfield” and removing the words “in Winchfield” would give residents “false hope”. See [YouTube video](#).

This is backed up by contemporaneous email exchanges with councillors such as:

On 23 Nov 2014, at 21:28, "Wendy Makepeace-Browne" <wendy@wlmconsulting.com> wrote:

Hi Clare,

The council HAS to be site specific in the plan at this point in time to stave off unwanted developer attention. If we do not specify a site (and currently Winchfield is the only viable option due to the fact that you need a large land area on offer and a developer interested at a high enough level), we will have no defence against people who say we can't produce our numbers. If we can't prove land supply (even if it is on test) we will get bombarded by developers who are ready to go and I can guarantee that all areas with land options (and there are a lot of them currently waiting patiently in the wings) will be able to appeal successfully if HDC deny an application – this will not help our area and will cost HDC hundreds of thousands to fight.

The only way we can get our numbers, with decent infrastructure work that is so desperately needed, is to look at a new town option. Be advised that we do not have other viable new town sites at the moment despite what the public thinks, which is why the words 'in Winchfield' are in the document but if something comes up through the process, there is currently no reason why it wouldn't be tested too. Nobody wants this development but we are very sadly at a point where we cannot afford not to put it forward for testing.

Regards
Wendy

Note that although they say they will look at other sites if they come up, they actually vote to exclude that possibility. Moreover, despite saying Winchfield is the only viable option (prior to testing); they also acknowledge that other developers are waiting in the wings to swoop in with other applications on other land. Indeed some councillors seemed concerned that options to purchase the land may have been due to expire. Maybe this explains their haste to identify Winchfield as the sole option for testing.

On Wed, Nov 26, 2014 at 10:10 PM, Wendy Makepeace-Browne <wendy@wlmconsulting.com> wrote:

Thanks for your note Rob.

I'm new to the council so am learning at the moment but I'm a bit amazed (dismayed and disappointed) that you think it's OK for Hart to not have a LP? Even I know how dangerous that is with all the developers in the wings waiting for us to be laid open, which will no doubt cause Winchfield to be built on ASAP as HDC will have little defence against its numbers ... I understand that the option is running out imminently on some Winchfield sites so the developer is VERY keen to get moving?

Tomorrow will be an interesting meeting – will you be coming to speak on your note as it will be interesting to see what the more experienced HDC Councillors have to say about it?

Best regards

Wendy Makepeace-Browne

For Fleet Central Ward

[2.1.2.2016: Draft Local Plan with no new settlement disappears and housing target increases](#)

I understand that in [December 2016](#), a draft Local Plan was produced that did not include a new town at Winchfield or anywhere else. The main reason for this is that despite earlier assertions that there just wasn't enough brownfield capacity in the district, a planning application for 1,500 new homes on the former Pyestock site had been made. Moreover, a number of office conversions had appeared using Permitted Development Rights. This draft document was rejected by the Community Campaign Hart group and never saw the light of day. The Inspector may wish to request a copy of this document.

This draft was intended to meet the then current SHMA target of 8,022 new dwellings.

Shortly afterwards, it became apparent that the housing target would be increased by more than 2,000 houses. Many people including me, thought the rationale for increasing the housing target by a further 2,000 units was spurious to say the least. However, this meant that it was no longer possible to meet our remaining needs through brownfield development alone.

Lo and behold, later in 2017, a new Regulation 18 consultation was published which included a new settlement at Murrell Green (much of which is in Winchfield Parish boundaries). The [Sustainability Assessment test results for Winchfield](#) had to be dragged out of the council using a Freedom of Information request. The SA results for Murrell Green conveniently overlooked the fact that a [Major Accident Hazard Pipeline](#) in the form of a high pressure gas main runs through the site. The site schematics included a school built right on top of the gas pipe.



2.1.3. Recent Developments

Since the 2017 Regulation 18 consultation, the Government have come up with new proposals to calculate housing need. These reflect much of the criticism I have made of the previous attempts at the SHMA. These can be found [here](#), [here](#), [here](#) and [here](#). These new targets result in a build rate required of 292dpa over the plan period from 2016-2032 and include an 'affordability uplift'. Adopting this target would mean that Hart had already granted permission for more houses than is required over the plan period.

Yet, inexplicably, the council has decided to remove the 40% cap on the affordability uplift and introduce a further 25% uplift to give a resultant 388 dpa. Even this inflated target could be easily met without a new settlement. However, policy SS3 has included a new town area of search, even though even the Council admit it is not required (See [here](#), slide 9).

Why a new settlement? (I)

- We don't need a new settlement to meet housing target

BUT...

Already included
96dpa or 1,536
more than needed

No evidence a new school
required and no school
being promoted in the Local
Plan

- Need to review the Plan every 5 years
- More homes likely to be needed
- Preferred option for that extra growth:
 - A new community with secondary school
 - Murrell Green/Winchfield - most sustainable and deliverable option

No evidence to support
this assertion. In fact,
plenty of evidence to
the contrary

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Given all of the history outlined here, it is difficult to come to any other conclusion than certain members of the council had predetermined that they wanted a new settlement and they wanted it at Winchfield. In summary, certain members of the council have frustrated all attempts to test other locations; they have even derailed versions of the Local Plan without a new settlement at Winchfield and ignored all opportunities to avoid concreting over many of the best parts of the district even though even they admit a new town is not required. It is difficult to avoid the conclusion that certain members of the council had predetermined the outcome from the outset.

2.2. Inappropriate Scope of Consultation

In 2015, a number of concerned residents approached Peter Village QC and his colleague Andrew Tabachnik to seek an opinion on the lawfulness of the process that had been carried out to date.

See the advice in the embedded attachment:



Peter Village QC
Opinion

The key paragraph is (my emphasis):

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, to which the "duty to co-operate" is likely to apply as well. Indeed,

there is a clear link between these topics and housing provision / distribution. We note also that the current evidence base on these matters is, in many instances, significantly out of date. Regulation 18 of the 2012 Regulations plainly requires consultation on the “subject” of a proposed local plan. 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 (thereby exposing itself on the “soundness” issue), or it will incorporate matters which have indisputably not been the topic of any regulation 18 consultation.

Nearly three years after that advice, no consultation has been carried out on employment, retail, transport or infrastructure. The Council is therefore exposed on soundness. In particular, we believe that to press on with a new DPD about a new town would be inappropriate as there are undoubtedly better ways to address retail, transport and infrastructure issues facing the district without building a new town. Indeed many would argue that building a new town may well exacerbate many of the issues we currently face.

Remedy: We believe a suitable remedy to these issues would be to amend the Local Plan to remove policy SS3 and make an appropriate adjustment to Policy SS1 to reflect that removal.

Policy SS1:

New Settlement Area of Search

~~To help address longer term growth requirements⁷, an area of search is identified in this Plan for a new settlement (see the key diagram and Policies Map). The new settlement will be brought forward through a separate development plan document (DPD) in accordance with Policy SS3.~~

The entirety of Policy SS3 should be deleted.

3. Soundness

Now we turn to the subject of soundness.

3.1. Policy SS1 – Spatial Strategy

Policy SS1 deals with the spatial strategy. We disagree with the quantum of new housing proposed in the draft Local Plan.

First, the numbers proposed are far too high and they are unsustainable. Second, the long term effect of planning for too many houses is that the initial effects are compounded, leading to permanent unsustainability.

3.1.1 Proposed number are far too high and unsustainable

They propose 6,208 new homes over the plan period at a rate of 388dpa. This is both unnecessary and undesirable on a number of grounds:

The 2016 SHMA called for 8,022 new dwellings over the period 2011-2032. This was already too many. For reasons explained in more detail [here](#):

- The starting point was inappropriate, using 2012 DCLG forecasts instead of the 2014-based figures.
- The affordable housing uplift was inappropriate because it was proposing to help those already renting but not able to buy. By definition, these people are already housed and therefore do not

need an additional house to be built. Any arguments about building more houses increasing supply and thus reducing prices are spurious because any reasonable expectation of building will have only a negligible impact on prices. This is explained by Ian Mulhiern of Oxford Economics [here](#).

- The jobs growth adjustment was inappropriate, anticipating higher rates of jobs growth than seen in periods of much higher economic growth. The SHMA then acknowledged that most of the extra people brought in by these extra houses will work outside the district. This is borne out by the [M3 LEP Strategic Plan](#), which does not identify any part of Hart as either a 'Growth Town' or a 'Step-Up Town', so will be starved of investment. Moreover, the Employment Land Review (ELR) describes Hart's office space as:

There appears to be an over-supply of lower grade stock with concentrations of dated, larger footprint, stock to the north of the town centre, specifically at Ancells Business Park, which is currently experiencing relatively high levels of vacancy.

Hook office space similarly experiences high vacancy rates and there is strong interest in office to residential conversion.

Commercial agents note that the costs of refurbishing such stock to a good standard attractive to the market typically costs between £50-£60 per sq ft; and that the current over-supply of office accommodation limits investment in refurbishing such stock as low rent levels made such investment unviable.

Clearly, this uplift was not an expression of the 'need' for the district. More importantly, building extra, unnecessary houses will then cause more people to move into the district. Because the employment space is sub-standard and not in a strategic location, these people will commute elsewhere each day to work. This is the very antithesis of sustainable development.

I think these arguments make clear that the target of 8,022 houses over the old plan period of 2011-2032 was unsound and unsustainable. This is further borne out by [the analysis of Alan Wenban-Smith](#).

The current draft Local Plan calls for 6,208 houses to be built over the period 2016-2032. Hart built 1,830 houses over the period 2011-2016. This makes the total target over the comparable period 8,038 houses. This is more than the prior target in the SHMA despite the new Government method for calculating housing need showing a much slower rate of building being required. This is also unsustainable for the same reasons as above.

Year	Housing Requirement	Source	Completions	Difference
1996/97	317	Structure Plan ²	308	-9
1997/98	317	Structure Plan	364	47
1998/99	317	Structure Plan	163	-154
1999/00	317	Structure Plan	211	-106
2000/01	317	Structure Plan	294	-23
2001/02	317	Structure Plan	341	24
2002/03	317	Structure Plan	443	126
2003/04	317	Structure Plan	567	250
2004/05	317	Structure Plan	642	325
2005/06	317	Structure Plan	527	210
2006/07	317	Structure Plan	396	79
2007/08	317	Structure Plan	229	-88
2008/09	317	Structure Plan	52	-265
2009/10	220	South East Plan ³	-17	-237
2010/11	220	South East Plan	70	-150
2011/12	220	South East Plan	326	106
2012/13	220	South East Plan	197	-23
2013/14	382	SHMA ⁴	264	-118
2014/15	382	SHMA	338	-44
2015/16	382	SHMA	705	323
2016/17	382	SHMA	623	241
TOTAL	6,529		7,043	+ 514

Table 3: Historic performance on housing delivery

Basically, the council have found a way of arbitrarily adding back unnecessary houses without even the fig leaf of the flawed justifications used in the prior SHMA.

Their current proposal is for 6,208 houses or 388 dpa over the period 2016-2032. This is made up of the Government target of 292dpa. This figure itself is made up of the raw DCLG household projections plus an agreed 'affordability uplift' because Hart's house prices are very high. They then remove the 40% cap on the affordability uplift and add and further 25% uplift to the result.

Housing numbers 2016-2032

Proposed standard methodology (capped)	292 dpa
Remove the cap	310 dpa
25% uplift - Contingency against increase - Affordable housing delivery - Previously developed land - Buffer against non-delivery	388 dpa
Total	6,208

Their justifications for the 25% uplift are:

- **Contingency against increase.** I would suggest that adding to the housing target is an inappropriate way of dealing with this issue. It would be more appropriate demonstrate there is flexibility in housing supply to meet potential additional demand, rather than add extra demand without knowing it is there.
- **Affordable housing delivery.** This has already been accounted for in the 292dpa Government figure. In any event, as discussed above, building more won't make a significant difference to house prices, and so won't make houses any more affordable for people already living here, so it's a spurious argument.
- **Previously developed land.** We have no idea what this means.
- **Buffer against non-delivery.** Again this is a spurious argument. The way to deal with this issue is to demonstrate flexibility in supply, not add additional demand.

Taken together their reasons are spurious and do not stand up to any sort of scrutiny.

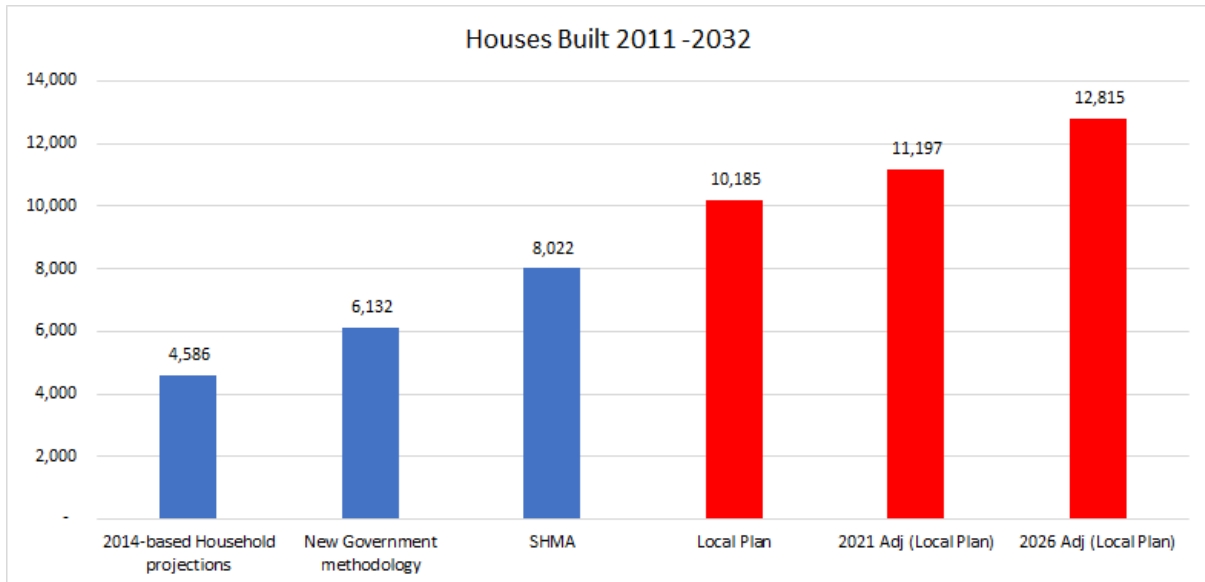
3.1.2 Compounding effect results in permanent unsustainability

When the prior draft Local Plan was calling for 10,185 houses to be built, we carried out [some modelling](#) to work out how the unsustainable rate of growth would be affected by reapplying the Government methodology at five year intervals from 2016.

Essentially, the Government figures work by projecting forwards the trends of the previous five years, to arrive at a household projection estimate. An affordability uplift is then applied to this result to generate the building rate required for the subsequent period. In areas with high house prices, like Hart, because building more will have no impact on prices, the affordability uplift would be essentially compounded at each five year review point.

This could end up leading to massive increases in unnecessary housing requirements towards the end of the plan period. This will apply regardless of the starting point. However, if the starting build rate is artificially inflated, then this too will continue to be compounded into the future. We will be faced with still more housing, more people migrating into Hart and then working elsewhere. This is again the very definition of unsustainability.

An example of how this worked with the prior Local Plan housing target of 10,185 is shown in the chart below.



Essentially, it resulted in a rate of house-building that was more than double that set at the outset by the Government household projections. The effect will be less severe with the housing numbers proposed in the new Local Plan, but will nevertheless lead to significant, unsustainable over-building.

Therefore we believe that the starting point for the Local Plan should be no more than the Government’s target of 292dpa or 4,672 dwellings in total. Because it isn’t yet clear whether Surrey Heath can meet its requirement, we would be prudent and add a few hundred to this to give a round number total target of 5,100 houses.

Remedy: We would therefore suggest that policy SS1 be adjusted accordingly:

New Homes

Subject to the availability of deliverable avoidance and mitigation measures in respect of the Thames Basin Heaths Special Protection Area, provision is made for the delivery of at least 6,208 5,100 new homes (388-319 new homes per annum) between 2016 and 2032.

3.2. Amendment of policy SS3 – New settlement

The most egregious part of the draft Local Plan is the proposal to include an unnecessary new town. This should be removed for the following reasons:

- The new town is not required, even with the inflated housing numbers in Policy SS1

- The proposal is unsustainable and undeliverable
- The supposed sweetener of a secondary school is unnecessary and won't be placed in a viable location
- Will lead to coalescence with surrounding settlements
- Breaks a number of the council's own objectives elsewhere in the plan
- It will hinder the much needed regeneration of our urban centres, in particular Fleet

The new town is not required

As described above, the housing numbers in the draft Local Plan are too high. Even if one assumes the housing numbers are correct, the council itself admits that the new town is not required.

Why a new settlement? (I)

• **We don't need a new settlement to meet housing target**

BUT...

Already included
96dpa or 1,536
more than needed

No evidence a new school
required and no school
being promoted in the Local
Plan

- **Need to review the Plan every 5 years**
- **More homes likely to be needed**
- **Preferred option for that extra growth:**
 - A new community with secondary school
 - Murrell Green/Winchfield - most sustainable and deliverable option

No evidence to support
this assertion. In fact,
plenty of evidence to
the contrary

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Not only that, the council themselves admit that the housing supply is under-estimated.

Table I Sources of Housing Supply

Source	Homes
a Homes completed between 1 st April 2016 to 6 th October 2017	798
b Sites with outstanding planning permission at 6 th October 2017	3,046
c Other deliverable sites ¹⁰	504
d Sites within settlement boundaries ¹¹	184
e Hartland Village (site allocation – see Policy SS1)	1,428 ¹²
f Sites in the Odiham and North Warnborough Neighbourhood Plan without planning permission at 6 th October 2017	111 ¹³
g Small site windfall allowance ¹⁴	275
Total	6,346

⁸ [Planning for the right homes in the right places, CLG, 2017](#). This provides a figure of 292 dwellings per annum for Hart from 2016.

⁹ i.e. sites that have planning permission, or have a resolution to grant planning permission subject to the completion of a legal agreement

¹⁰ This includes sites where there is a Committee resolution to grant permission subject to completion of a S106 Agreement as at 6th October 2017 and are listed in Appendix 2.

¹¹ This is likely to be an underestimate as it is based only on known developable SHLAA sites within settlement boundaries (see Appendix 2). There is no double counting with other sources of supply.

¹² The site is allocated for 1,500 dwellings (see Policy SS2) with 1,428 expected to be constructed within the Plan period (source: planning application Ref. 17/00471/OUT).

¹³ This is an adjusted figure to ensure no double counting with sites with planning permission.

¹⁴ See Appendix 2 for how the small sites windfall allowance is calculated.

And even this under-estimate does not include housing supply identified in the Winchfield and Hartley Wintney Neighbourhood plans.

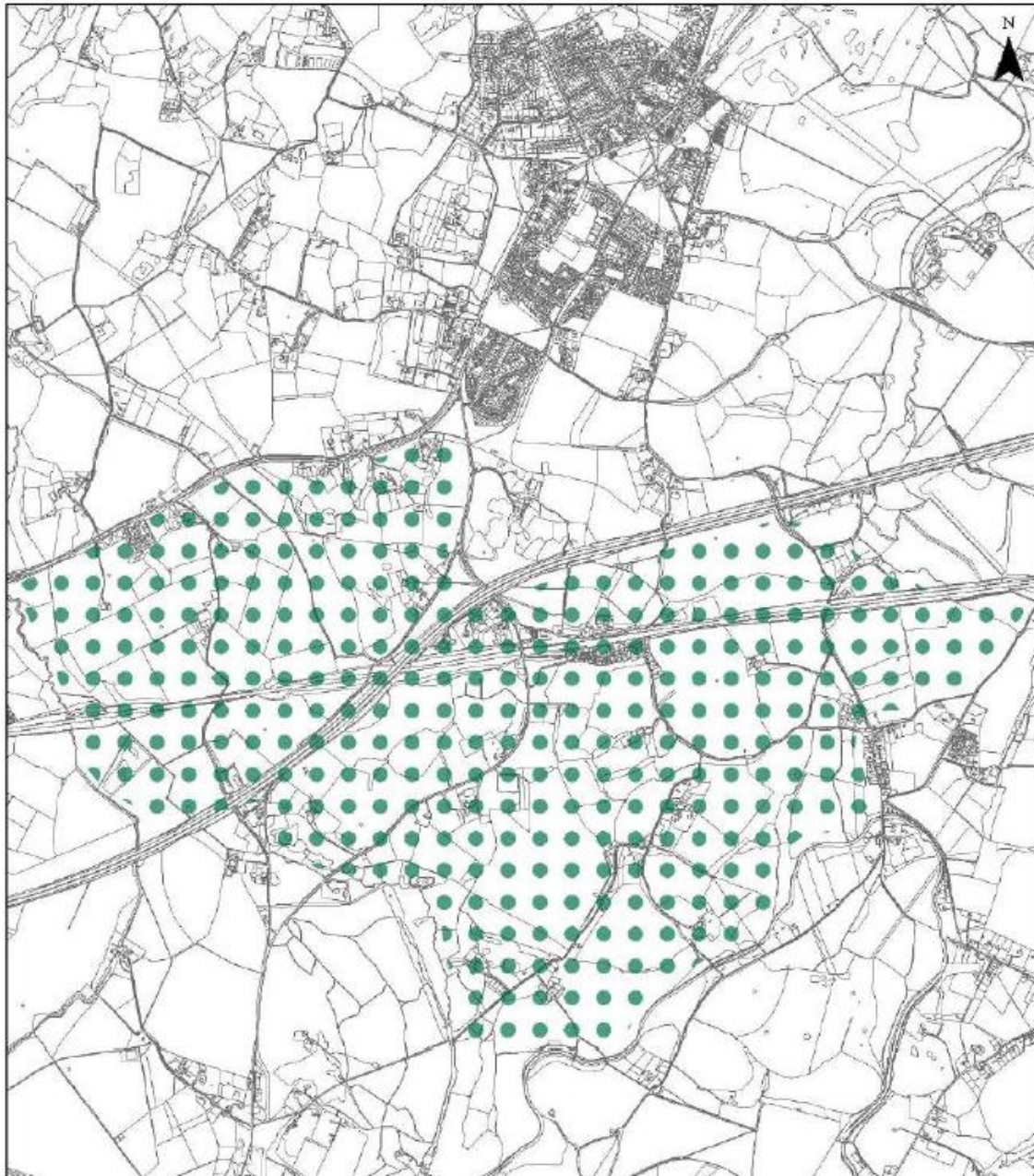
The combination of the over-inflated housing demand numbers and the under-stated housing supply numbers mean that the new town simply is not required.

[The proposal is unsustainable](#)

The area of search identified in the Local Plan contains a very wide area, consisting of the areas known as Murrell Green and Winchfield.

Policy SS3 Murrell Green / Winchfield Area of Search

New Area of Search



The attempts at sustainability appraisals of the Murrell Green and Winchfield sites have been poor, but nevertheless have demonstrated some very significant weaknesses that cannot be overcome.

Let's deal with Murrell Green first. Part of the site, known as Beggars Corner was the subject of a planning application for a Solar Farm. This was [refused on the grounds](#) that it would spoil the views from Odiham. It is difficult to see how a 1,800 unit development would be any less intrusive than a solar farm. Moreover, that planning application identified that part of the Beggars Corner location is former landfill and some of it has unknown contents. This does not appear to be a suitable location on which to build new houses, or indeed form part of a SANG.

Table 4.1 Preliminary on-Site landfill area identification

Landfill area No	Landfill area name	Summary	Information Source
1	Scotland Farm, Potbridge	The details of the waste type and operation dates are not available however, the mapped extent of the landfill (seen in Appendix A) covers 75% of the extent of the Site and also a large area to the west of Totters Lane, either side of River Whitewater.	Envirocheck Data (Appendix A); Environment Agency (2013)
2	Beggars Corner Field	Deposited Waste included Inert, Industrial, Commercial and Household Waste" between 8th April 1986 and 31st December 1986. The licence was initially issued to D Brant Estates Ltd on the 15th March 1984 (Ref: 2/ 22c). The mapped extent of the landfill is located directly adjacent to the Site in the far eastern corner of the land between the railway line and the M3 motorway.	

The sustainability appraisal conveniently did not cover this part of the proposed Murrell Green development.

Moreover, the SA did not manage to discover that there is a Major Accident Hazard Pipeline crossing the site. Not only that, the developer's proposal included a secondary school sited right on top of the pipeline. After examination of the HSE rules regarding such installations, I conclude that neither houses nor schools will be able to be built within up to 100m of that pipeline. I also understand that roads should not cross such pipelines either. See analysis [here](#).



When one adds in other constraints such as SINC's, proximity of a high voltage power line, the railway and the M3, it appears as though the Murrell Green part of the area of search is not suitable for large scale development.

Turning to the Winchfield part of the area of search, it should be noted that the Winchfield sustainability assessment had to be extracted from HDC by FOI request. It can be found [here](#).

The first point to note is that much of land in the Winchfield area of search is not in fact for sale. This comprises the central swathe known as Talbothay's Farm plus other areas. Immediately, this leads to the conclusion that it won't be possible to plan for a coherent settlement if the central part is not available.

In addition, the main areas considered to be constraints in the SA report were:

- Historic Environment
- Bio-diversity
- Landscape
- Water Quality
- Flood risk

More detail on this can be found [here](#). Other spurious claims were made in the SA, such as the claim that building a "renewable and low-carbon energy generation and transfer" plant will diversify energy supply. What they mean is building a wood-burning power station utilising locally sourced timber (p74). Such a plant would be extremely undesirable since burning wood produces more CO2 than burning coal, and none of the proposed master plans include such space for such a plant. Plus, of course, I don't think many people would support chopping down Bramshill forest to fuel such a plant. This claim was used to indicate that Winchfield was somehow more sustainable than other potential locations.

They also claim that building 3,000 new houses, with associated traffic will somehow "reduce the emissions of greenhouse gases and manage the impacts of climate change". Again, complete and utter nonsense.

They also say there was some evidence of wet ground at the far east of SHL183, but "no other obvious evidence of current or past flooding".

	<p>SHL183: There is an extensive network of drainage ditches across this site, concentrated to the northeast and south of Vale Farm cluster, traversing the eastern part of the site and within the centre of the southern parcel, south of Station Road. Some of these drains were substantial and, at the time of our visit, most contained water. Some, such as that to the southeast of Vale Farm cluster were rather overgrown. There is a small pond just to the west of Hurst Farm. At the far east of the site, the River Hart forms a short boundary with SHL183 on the north site of Pale Lane Marsh. South of Station Road, the drainage ditches form a minor watercourse within the shallow valley that drains northwards towards the railway line and eventually joins the River Hart to the east of SHL124. Within the valley feature is a small pond (approx. 0.06 ha) that appeared to have been used by cattle and was cloudy with banks having been trampled.</p>
<p>Evidence of current or past flooding?</p>	<p>At the time of our visit, some areas of very wet ground were observed, with small amounts of standing water, for example, at the south of SHL185, at the north of SHL183 (just west of Taplin's Farm Lane) and towards the centre of the southern parcel of SHL183, between Station Road and Round Copse. The far east of SHL183 (Pale Lane Marsh) appeared to show signs of wet grassland vegetation, but was not entered. <u>There was no other obvious evidence of current or past flooding.</u></p>

This is of course complete nonsense. The detailed assessment also says there's only a one in 30 year chance of surface water flooding. The area of Taplins Farm Lane near the railway bridge flooded three times in 2016 alone. Evidence documenting the flood events can be found [here \(4 Jan\)](#), [here \(7 Jan\)](#), [here \(9 March on Station Road\)](#) and [here \(28 March due to #StormKatie\)](#). I also understand that a similar area has flooded again in 2018. These are obviously more than one in 30 year events.

The area east of Winchfield fared less well than Murrell Green in the sustainability assessment even with the grossly understated the [flood risk](#). And of course there were other issues with Historic

Environment, Bio-diversity, Landscape and Water Quality. It is difficult to see how this could deliver a significant number of houses.

The area west of Winchfield was ruled out of the [sustainability assessment](#), because it is a more peripheral location relative to the train station, does not offer a central focus and is in close proximity to Odiham SSSI. It therefore offers little prospect of significant housing development.

It is clear that there are very considerable constraints even before considering the infrastructure problems.

Hart has not put together proper estimates of the costs of infrastructure; despite [saying it would do so](#).

4.2 Part 1 – Site Assessment (Suitability, Availability and Achievability)

An exercise using constraint data, and site promoter's submissions. The work would:

- provide a Site Assessment of deliverability (ie availability, suitability and achievability), specifically:
 - Í Confirming site availability with owner/promoters
 - Í Reviewing policy and development constraints to confirm suitability in principle (key issues being flood risk, statutory environmental designations, non-statutory environmental designations, heritage designations, agricultural land classification etc.)
 - Í Mini market review to illustrate market appetite for delivery through more than one developer
- produce a broad land use budget including an estimate of the capacity of the location. This includes a review of infrastructure provision, such as SPA mitigation, open space and education, and the consideration of development mix and density in light of the market for delivery for example.

4.3 The intention behind Part 1 is that it would establish baseline information, to inform the Council's choice of a final Preferred Approach.

4.4 Part 2 – Infrastructure Requirements and Service Providers Consultation

Part 2 would build on the baseline assessment by considering the infrastructure requirements and the viability. Part 2 will specifically undertake the following:

- Consultation with infrastructure stakeholders such as utilities, transport, education, health, SPA mitigation, open space, health, and emergency services to establish the infrastructure requirements including costs
- Recommendations on which infrastructure items might be best delivered through planning obligations either on site or S106 and could potentially be funded through Community Infrastructure Levy (CIL)
- Verification that the affordable housing and policy targets are compatible with any identified S106 obligations.

We have made several estimates that can be found [here](#), [here](#) and [here](#). Essentially, if a new motorway junction is required, the costs will be in excess of £300m. If the new junction is not required, the costs will be at least [£200m](#). A rough schedule of requirements includes:

- Secondary school and three primary schools
- New sewage works
- Power station (as per SA)
- Improved drainage
- Re-routing or burying of electricity power lines
- Railway station upgrade to extend platforms and car park (or relocate)
- The bridges that carry the railway over Station Road, Taplins Farm Lane and Pale Lane will all need to be upgraded in some way
- New big roundabouts at either end of the B3016
- New smaller roundabouts from B3016 and A30 to the new town, new roundabout to join Pale Lane and the A323, new roundabout on A287/Crondall Road and at Pilcot Road/Hitches Lane
- New or widened roads at Bagwell Lane, Taplins Farm Lane/Church Lane, Station Road, Pale Lane and Chatter Alley/Pilcot Road. Plus many ancient hedgerows will have to be relocated.
- Potentially widening the A30 around Phoenix Green on the approach to Hartley Wintney
- New healthcare facilities
- New sports and community facilities

If this is a 5,000 dwelling new town, with 40% 'affordable', the remaining market houses might be expected to generate £15-20K per unit of S106/CIL. This would amount to around £45-60m. This is well short of the funding requirement and therefore might be expected to make the existing infrastructure funding gap worse.

Taken together, it is difficult to see how such a new town could be either sustainable or viable. Indeed, it is notable that in the three years of this saga, with many Hart Council members being supportive and apparently developers becoming anxious, no planning application has been made. Perhaps that's because the developers also realise this is a pipedream.

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.

Hart District	October 2013	Forecast 2018
Number of Secondary Schools:	5	5
Total Planning Area School Capacity:	5716	6016
Total Planning Area Number on Roll:	5267	5564
% Surplus Capacity	8%	9%
Total Planning Area Year 7 PAN	1085	1141
Total Planning Area Year 7 Intake	1022	1130
% Intake Year Surplus	6%	1%

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.

Hart Primary Schools							
Primary Planning Area	Number of Infant/ Primary Schools	Year R: Total PANs Oct 2016	Year R: Number on Roll Oct 2016	Year R: % surplus places Oct 2016	Year R: Proposed PANs Oct 2021	Year R: Forecast No. on Roll Oct 2021	Year R: Forecast % surplus Oct 2021
Fleet / Crookham	12	570	630	-11%	600	554	8%
Yateley / Frogmore	8	285	259	9%	285	229	20%
Hook / Odiham	8	325	300	9%	325	296	9%
Hart Secondary Schools							
Secondary Planning Area	Number of Secondary Schools	Year 7: Total PANs Oct 2016	Year 7: Number on roll Oct 2016	Year 7: % surplus places Oct 2016	Year 7: Proposed PANs Oct 2021	Year 7: Forecast No. on Roll Oct 2021	Year 7: Forecast % surplus Oct 2021
Fleet	2	474	467	1%	564	572	-1%
Odiham	1	240	272	-13%	270	281	-4%
Yateley	2	401	383	4%	401	362	10%

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.

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.

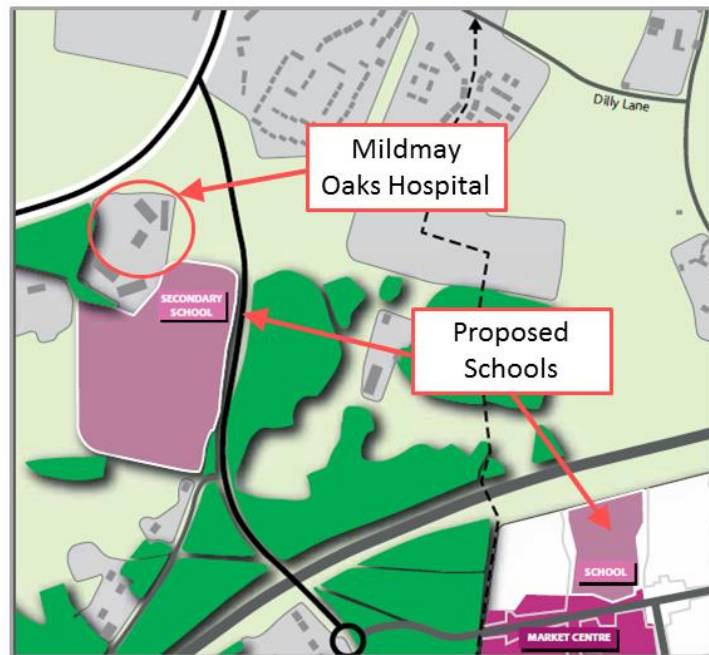
There are always individual schools with exceptionally high demand, which is a credit to the high standard of teaching at these schools.

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

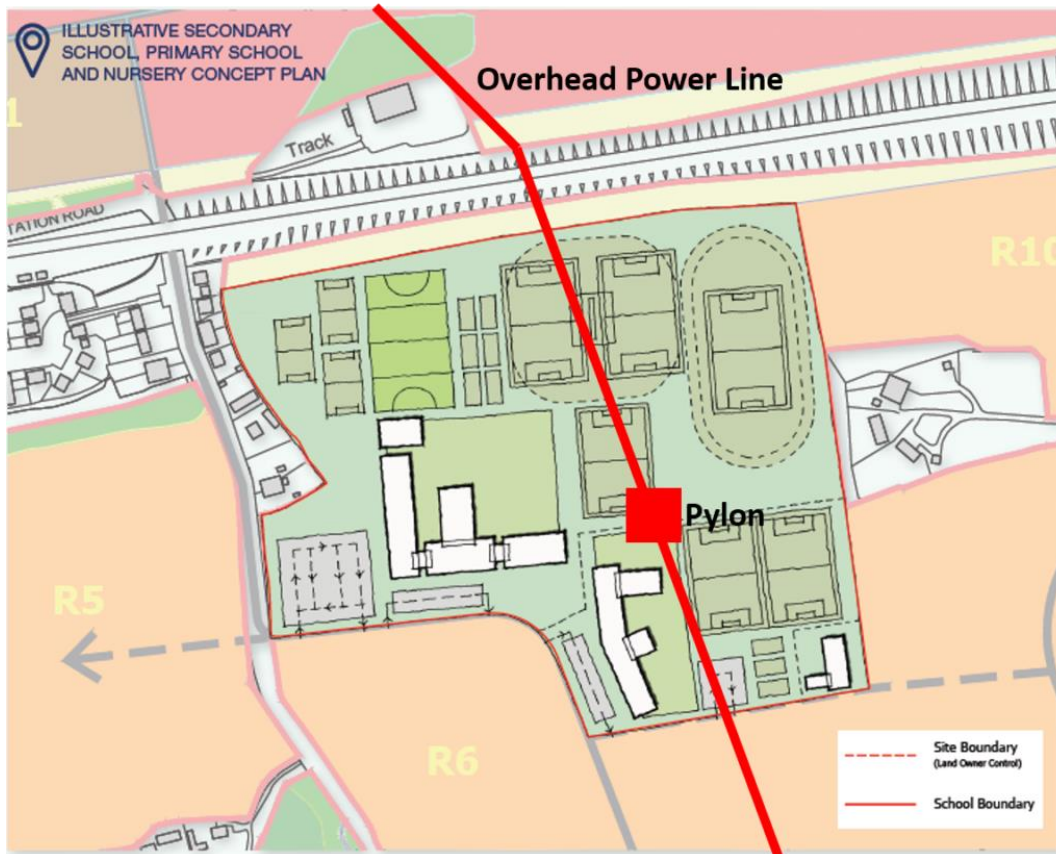
So, having established that a new school is probably not required, we must now address the proposals that have been put forward over the past three years for the sites of new secondary schools.

First, we had Barratts in 2014 putting up a proposal to place a [new school right next door to an institution housing sex offenders](#).



Then we had the proposal, described above to build a secondary school right on top of the high-pressure gas main running through the Murrell Green site.

More recently we have had another proposal from promoters of Winchfield which placed the secondary school directly [under the high-voltage power lines](#).



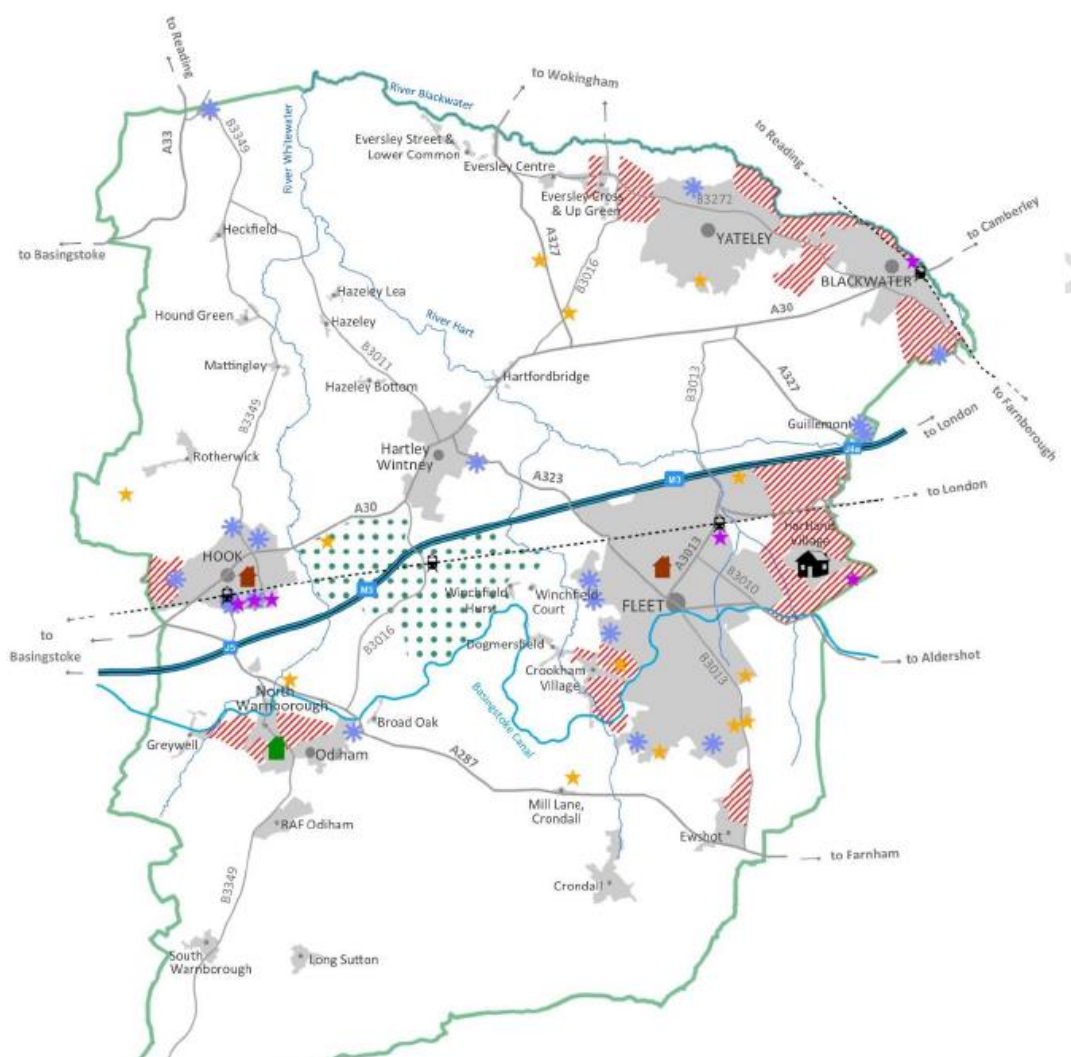
If after three years of trying, they cannot find a suitable location for a secondary school, one does have to come to the conclusion that they never will.

In conclusion, it is apparent that we don't need a secondary school, and none of the developers involved have managed to find a suitable location.

Coalescence

The area of search is very wide. It borders Hook to the west, Hartley Wintney/Phoenix Green to the north east and comes very close to the Edenbrook development and the proposed Pale Lane development to the east. The bulk of the proposal also comes very close to Dogmersfield.

In other areas of the Local Plan, the council have been quite assiduous in defining strategic gaps. They have produced no such gaps around the new area of search, nor to the east of Hook or anywhere around Hartley Wintney. Nor are any gaps proposed to the north west of Fleet.



If they are allowed to go ahead with this area of search, unconstrained by strategic gaps, there is a strong risk that they will come up with proposals that lead to coalescence of our proud villages.

Breaks Objectives

Elsewhere in the Local Plan, Hart have come up with a number of objectives. These are reproduced below with my comments **in bold** on how these proposals break those objectives.

5. To support the vitality and viability of the District's town and village centres to serve the needs of residents. **Adding a new settlement will draw retail traffic away from our existing urban centres, most notably Fleet, and lead to even faster degeneration of Fleet as a retail destination. This can hardly be described as supporting vitality and viability.**

9. To conserve and enhance the distinctive built and historic environment in the District including the protection of heritage assets and their settings. **The proposed area of search includes a Norman church dating back to the Domesday Book and several SSSI's including at Odiham and Basingstoke Canal. There are numerous other distinctive and historic**

buildings. Building a new settlement right next door to these valuable assets with neither conserve nor enhance the environment.

11. To protect and enhance the District's natural environment, landscape character, water environment and biodiversity, including ensuring appropriate mitigation is in place for new development to avoid adverse impacts on the Thames Basin Heaths Special Protection Area (TBHSPA). Building a new settlement in one of the most attractive parts of the district, containing many woodlands and hedgerows supporting much wildlife such as deer and kingfishers, used by many for leisure and recreation will actively damage the landscape and biodiversity.

*12. To provide measures for adapting to the impacts of climate change and minimising the contribution of new development to the causes of climate change, including **reducing the risk of flooding by directing development away from areas at risk of flooding**, and using opportunities offered by new development to reduce the causes and impacts of flooding from all sources. **We have already established that the SA grossly under-stated the flood risk in the area known as Winchfield East, yet they are proposing to build on this area, directly against their stated objective.***

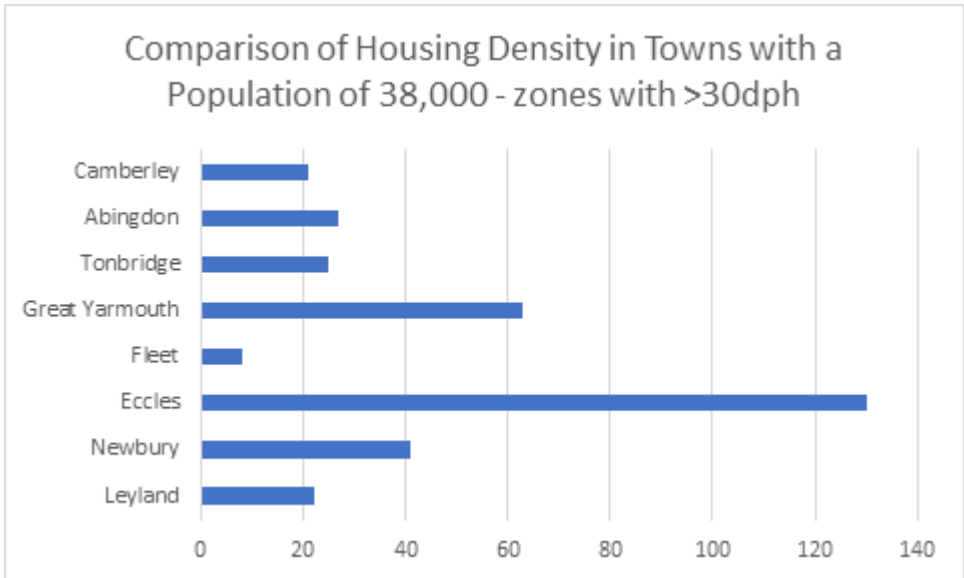
*13. To promote healthy and sustainable local communities through protecting and enhancing community, sport, health, cultural, **recreation and leisure facilities**, and through the delivery of a **multi-functional green infrastructure network across the District**. **We already have a multi-functional green infrastructure network in Winchfield used for recreation and leisure. Building on it will destroy it, again directly contravening their own objective.***

*14. To maintain the separate character and identity of settlements by avoiding development that would result in their physical or visual coalescence. **Again, we established the risk of coalescence earlier. This proposal, if implemented would effectively create a single urban conurbation from Hartland Park in the east, across Fleet and Hartley Wintney to Hook in the west. This is an appalling prospect, again directly breaking their own objective.***

Remedy: I would propose that Policy SS3 is removed entirely, and consequent amendments are made to SS1 as described above.

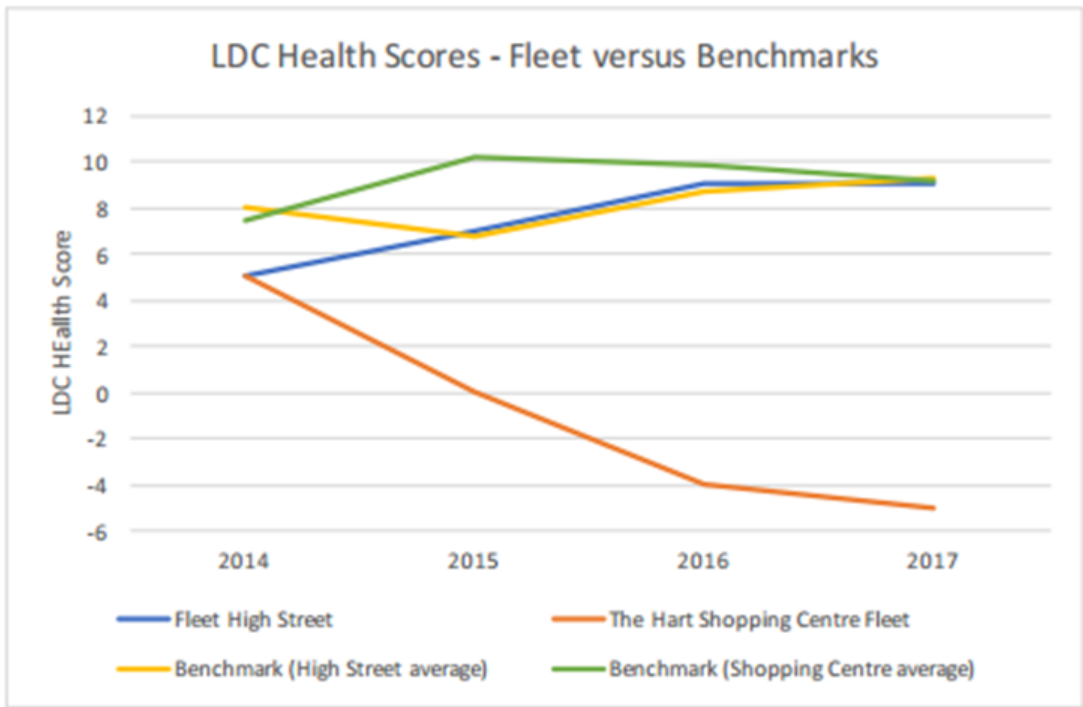
3.4 Amendment of Policies ED4, ED5 and ED6 – related to Fleet town centre and other urban centres

[Fleet is the lowest density town of its size in the country](#). The chart below shows that there is significant scope for increasing development density in Fleet.



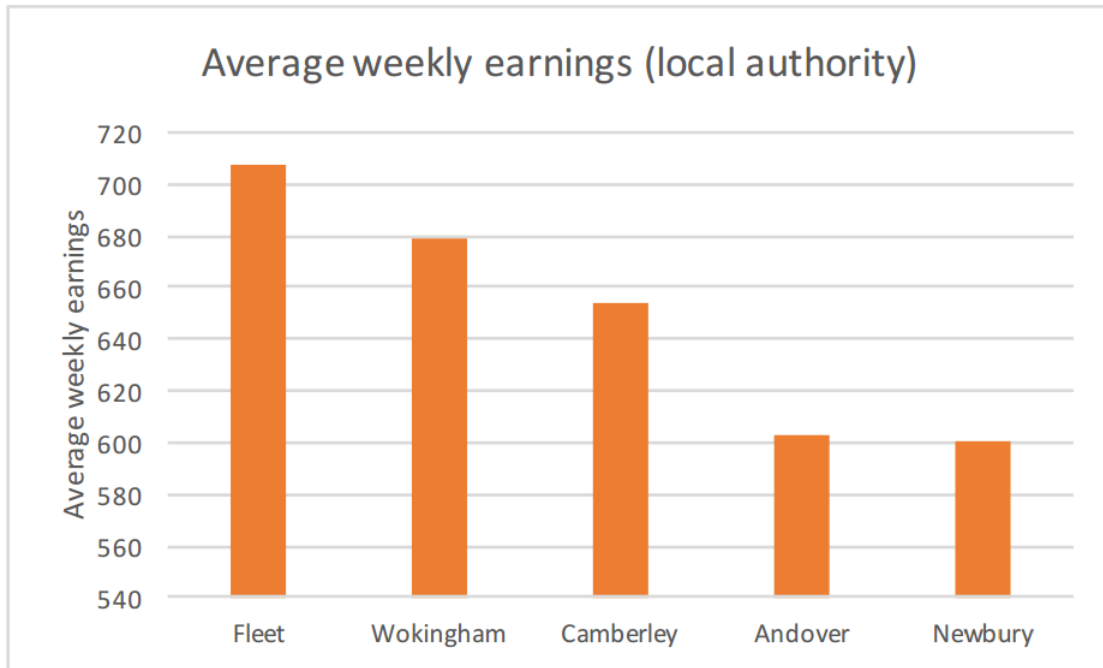
Fleet housing density versus towns of similar size

The retail offer in Fleet is poor, the cultural facilities (e.g. Harlington Centre) are outdated and there is no proper cinema.



Fleet Health score versus benchmarks

However, Fleet has the highest average earnings per person of comparative towns by quite a large margin (e.g.: 9% more than Camberley). High earnings should give Fleet a significant advantage over the comparison towns.



The Local Plan fails to take advantage of the opportunity to modernise Hart’s urban centres while at the same time protecting Hart’s countryside.

We believe that the Local Plan should be centred on the proposition that Fleet and other urban centres will be re-generated. With Hart District Council’s full and active support, a plan based on urban regeneration would achieve the following benefits:

1. An ambitious Hart Urban Re-generation Project (HURP) would attract private investment and thus be affordable
2. Private investment would allow for Hart’s infrastructure to be upgraded in line with the urban re-generation
3. Good urban design principles would achieve a higher population density in the urban centres while at the same time providing an improved ‘sense of place’ and making the urban centres more desirable places to live.

A similar approach could be adopted in Yateley to provide a proper retail-led centre and improvements could be made to Blackwater. The requirement for additional retail facilities in Hook, identified in the Local Plan could also be met.

Apparently, Hart did have a plan to conduct a [brownfield study](#) to evaluate the ‘art of the possible’ in our urban centres. This project has not delivered.

In addition, Yateley lacks a defined centre, Blackwater is indistinct and Hook lacks good quality restaurants and shopping facilities.

The council should be setting out a bold plan to improve the retail, cultural and recreational amenities in the district. We should also develop plans for a theatre and cinema in Fleet as part of an attractive mixed-use redevelopment. There will be significant cash available from developers to fund such an ambitious plan.

Our local MP, Ranil Jaywardena, has launched a [campaign to regenerate our urban centres](#). He said:

Looking to some of our local, district and town centres, however, it is clear to see that Fleet, Yateley and Hook are all in real need of revitalisation and regeneration. I've been spending time speaking to your local Councillors about this and taking a look at the work that needs to be done.

I am more convinced than ever that all three places have great potential – be that simply as shopping destinations or, with the right infrastructure improvements, as great places for our young people to get their foot on the housing ladder.

The trouble is that there is no 'masterplan' for any of these places. I will be raising this with Hart District Council personally – but I need your help. If you want smart new shops, some new flats for local young people to buy above them and better car parking, then act now.

The [BBC has recently interviewed](#) a number of people in Fleet about what it is like to live there. Everybody loves it, but they think there's been too much housing and not enough infrastructure. The draft Local Plan won't fix either of those issues, because they're insisting on building too many houses and aren't addressing infrastructure.

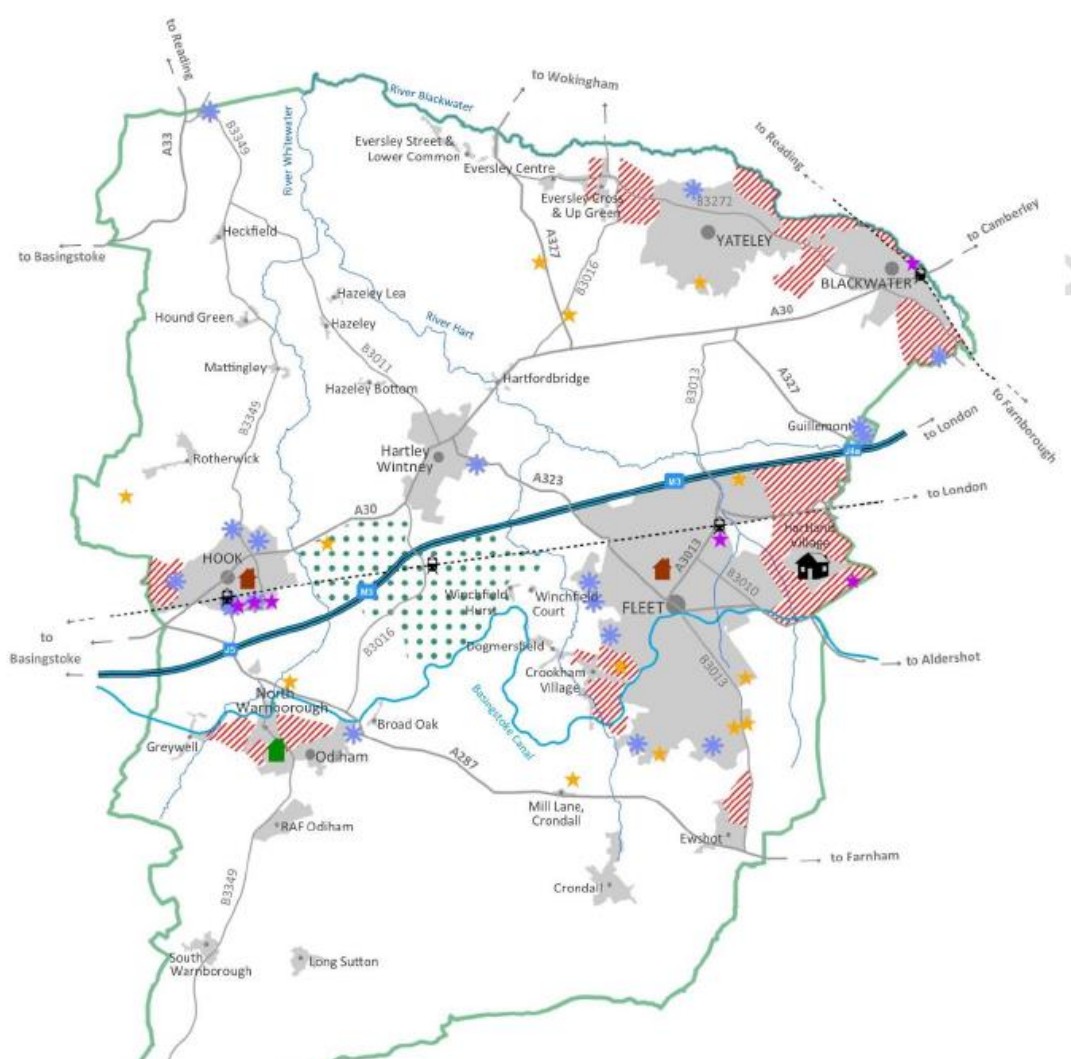
However, policies ED4, 5 and 6 effectively cast the existing centres in aspic and preclude significant redevelopment. I do not have the resources available to me to completely re-write these policies.

Remedy: Policies ED4, 5 and 6 should be removed for the time being and a proper community team put together to work with our local councillors and MP to come up with a master plan to regenerate our town centres.

3.5 Amendment of NBE2 – Gaps between settlements

As already identified above, the Local Plan identifies strategic gaps between settlements.

Hart Local Plan Proposed Submission Version – v1.0



However, no gaps are proposed to the east of Hook, to the north west of Fleet or anywhere around Hartley Wintney.

This policy needs to be amended to include (the first two restore the position of strategic gaps in the prior Regulation 18 consultation, that we don't recall many, if any people objected to, so it is difficult to see what evidence was used to remove them):

1. A gap to the west of Hook from the east bank of the River Whitewater to at least the power line between Hook and Hartley Wintney
2. A gap to the south and west of Hartley Wintney/Phoenix Green. This should be at both sides of the A30, from the existing end of development to the Murrell Green light-industrial estate and from St Mary's Park to the motorway
3. A gap from Elvetham Heath/A323 to the River Hart and from Edenbrook/Hitches Lane to the River Hart
4. A gap from the east of Taplins Farm Lane/The Hurst to the River Hart

3.6 Amendment of I1 – Infrastructure

One leading councillor has gone on the record, calling for an [‘infrastructure led’ Local Plan](#). Yet, they have [not allowed questions to be put to them about infrastructure](#), let alone answer them.

Back in [October 2014](#), Hart Council produced an [infrastructure delivery schedule](#) that set out the current deficit, split by type and area. This shows a deficit of £78m not including healthcare facilities. The breakdown is shown by type and area in the images below:

Table A3: Total Estimated Infrastructure Costs - by Type (March 2013)

Infrastructure Type	Estimated (£)		
	Costs	Existing Funding	Funding Gap
Built Leisure	21,250,000	7,000,000	14,250,000
Community & Cultural Facilities	1,715,000	900,000	815,000
Education	46,000,000	18,350,000	27,650,000
Flood Defences	290,000	290,000	0
Green Infrastructure ^{14/}	3,478,351	0	3,478,351
Transport	36,023,000	5,370,000	30,653,000
Utilities	1,000,000	0	1,000,000
TOTAL	109,756,351	31,910,000	77,846,351

The breakdown of the costs by area showed the Fleet/Church Crookham and Hook areas had by far the largest deficits.

Table A4: Total Estimated Infrastructure Costs - by Area (March 2013)

Location	Estimated (£)		
	Costs	Existing Funding	Funding Gap
Hart District: Strategic Projects	58,672,000	21,200,000	37,472,000
Fleet & Church Crookham	30,268,500	9,520,000	20,748,500
Hook	13,068,000	900,000	12,168,000
Hartley Wintney	1,007,000	240,000	767,000
Yateley & Blackwater	5,724,000	0	5,724,000
Odiham & North Warnborough	463,000	50,000	413,000
Rural Hart	553,851	0	553,851
TOTAL	109,756,351	31,910,000	77,846,351

Key quotes from the document include:

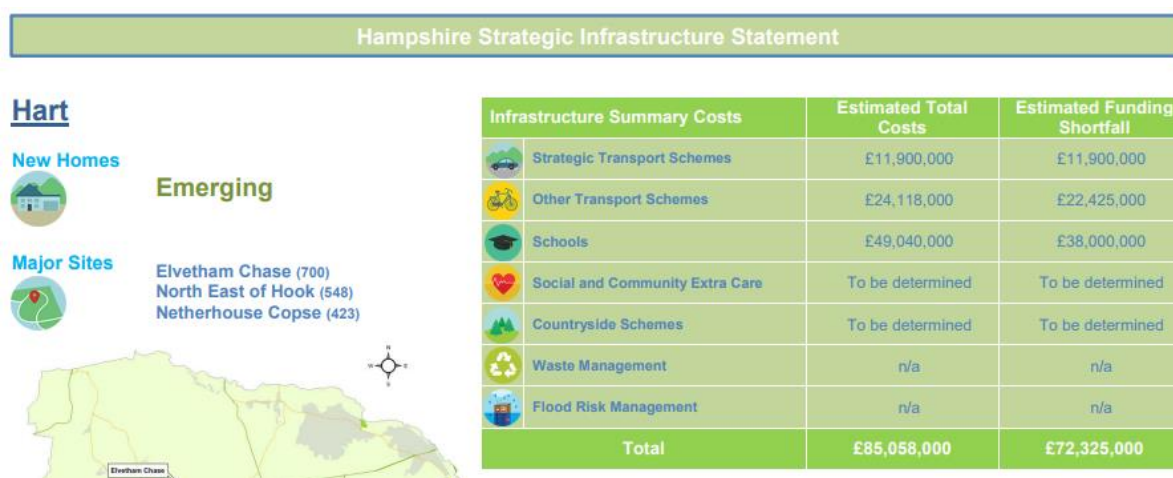
“It is therefore reasonable to conclude that it is unlikely that there will be sufficient future funds, from both capital programmes and developer contributions, within the plan period, to deliver all of the projects listed in the HCC Transport Statement”

“Although developer contributions will continue to play an important role in helping to bridge the funding gap, it is also clear that the funds raised through developer contributions will only contribute a modest proportion of the total identified funding gap”

“The South West Main Line (SWML) outer trains, which serve Hart, has significant forecasted future peak crowding, with a capacity shortfall of over 6,100 passengers in the high-peak hour, even if every main line train is at maximum length”

It should be noted also that [SWR has recently put forward proposals](#) to reduce services at Winchfield and Hook, exacerbating the rail capacity problem. The Local Plan doesn't even mention improvements to the rail network in infrastructure policies.

A more [recent estimate from Hampshire County Council](#) has estimated the infrastructure funding gap for Hart as £72m.



Hart's share of the gap is made up of:

- Transport, £34m
- Education: £38m.
- Countryside: To be Determined.
- Extra Care places: To be Determined.

No estimate has been made of the requirements or costs of additional healthcare provision.

The infrastructure policies in the [Local Plan are insipid and fail to address the funding gap](#):

- Policy I1: Infrastructure – **weak policy** simply requiring developers to deliver adequate infrastructure as part of their developments, when the studies above show that developer contributions won't be adequate to bridge the gap
- Policy I2: Green Infrastructure – **feeble policy** to supposedly protect green infrastructure. Yet they are proposing to build a new town that will destroy the best of our green infrastructure
- Policy I3: Transport – inadequate policy simply to provide 'maximum flexibility in the choice of travel modes', **nothing specific to improve road network or put pressure on SWR to improve rail**
- Policy I4: Open space, sport and recreation – policy to support development that improves sporting facilities, but **no tangible plans** for anything new

- Policy I5: Community Facilities – a very vague policy to improve childcare facilities, healthcare, police stations, youth provision, libraries, community halls, local shops, meeting places, cultural buildings, public houses, places of worship, and public toilets. But crucially, **no specific projects or proposals**.

Yet, the National Planning Policy Framework (NPPF) is clear that infrastructure must be planned alongside new housing. Failure to adequately plan for infrastructure requirements and costs could lead to the Local Plan being found unsound. See references to paras [17 and 177 of the NPPF](#) below.

177. It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan. Any affordable housing or local standards requirements that may be applied to development should be assessed at the plan-making stage, where possible, and kept under review.

Core planning principles

17. Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should:

- be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency
- not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives
- proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities
- take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs

It is clear from the above, that the proposals to build a new town will probably exacerbate the existing funding gap and not deliver any infrastructure in Fleet and Church Crookham, the very places where funding is most required.

Remedy: We therefore think the remedy to this issue should be that policy SS3 is removed in its entirety (with consequent changes to policy SS1 already outlined elsewhere). The infrastructure policies should be reworked to include as a minimum:

- Acknowledgement of the existing £72m infrastructure funding gap
- Quantification of the items missing from the Hampshire County Council assessment such as healthcare, extra-care housing for the elderly and green infrastructure
- A set of prioritised, costed projects that are required to alleviate the worst of our infrastructure problems in Fleet/Church Crookham and Hook. This should include road improvements, particularly near Fleet station and the bridge over the railway near the end of Elvetham Heath Road. It should also include significant improvements to the cultural facilities, particularly in Fleet.

- Plans to tackle Network Rail/SWR over rail capacity and services
- Proposals for raising the necessary funds for delivering the required projects
- Some external validation that the infrastructure plans in the draft Local Plan are 'sound' and will pass inspection

We believe that in preparation for the next review of the plan, a new policy should be created to regenerate our urban centres including attracting private capital so that we create a better place to live and address the existing infrastructure problems before even considering a new town that will only make matters worse.

3.7 Amendment to Policy ED2 and policies related to Para 297 – SANGS

Policy ED2 relates to safeguarding employment land and Para 297 refers to SANG owned by the council.

Policy ED2 [protects essentially every major employment site](#) in the district from redevelopment.

The reason this is a bad policy is that the prior version of the Local Plan itself, as well as the Employment Land Review (ELR), acknowledges that there is an over-supply of low grade office space (para 125). The ELR states that investment in this stock is unviable (para 6.17):

Commercial agents note that the costs of refurbishing such stock to a good standard attractive to the market typically costs between £50-£60 per sq ft; and that the current over-supply of office accommodation limits investment in refurbishing such stock as low rent levels made such investment unviable.

Owners of these sites have three choices. First they can keep the wasting asset and collect no rent, which is not an attractive commercial proposition. Second, they can convert the offices into flats. By and large, they need no planning permission for this. However, these types of development carry no obligation for S106 or CIL payments to councils. Nor do they deliver a good 'sense of place'. Finally, they could apply for planning permission to properly redevelop these sites into attractive homes, with a particular focus on affordable homes for the young. These types of development will be high-density, but with a good sense of place, and will attract some funding for infrastructure.

The consequences of this policy will be to discourage redevelopment of sites and either lead to more sites being simply converted or worse, sitting idle as eyesores.

We believe this is contrary to Government policy.

Remedy: Consequently policy ED2 should be removed.

Moreover, the Inspector should be aware that the council has implemented a new policy regarding SANG that effectively further [obstructs brownfield development](#). This is already [blocking schemes](#) that would provide homes that ordinary people can afford (as distinct from Affordable Homes that ordinary people can't afford). The schemes affected are a conversion on Ancells Farm and proposals to redevelop the old police station in Fleet town centre. It has been suggested that this SANG policy may be unlawful.

In addition, Hart has commenced work to implement an [Article 4 direction to block development](#) on brownfield sites.

In effect they have set some nice sounding objectives about protecting our historic assets and building green infrastructure, but their policies act against their objectives and actively create a worse place to live by leaving decrepit buildings to rot and scar the landscape.

We think the Inspector should also take a view on these policies since they are closely related to the Local Plan, even though they are not contained within it.

Remedy: We believe that the SANG policy and the Article 4 direction should be removed.