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Dear xxxx

I would like to complain to you about how the new National Planning Policy Framework is working in practice and implore you to change the guidance associated with it before our green and pleasant land is concreted over with housing estates.

I would also like you to explain what your policies are in relation to local and national planning in the run up to the forthcoming General Election and local elections.

First, let me remind you of some of the Prime Minister’s words in 2012, taken from this Telegraph article:

<http://www.telegraph.co.uk/earth/hands-off-our-land/9002655/Hands-Off-Our-Land-Housing-estates-will-not-be-plonked-next-to-villages-pledges-David-Cameron.html>

*He said: “I care deeply about our countryside and environment. Our vision is one where we give communities much more say, much more control. The fear people have in villages is the great big housing estate being plonked down from above.*

*“Our reforms will make it easier for communities to say ‘we are not going to have big plonking housing estate landing next to the village, but we would like 10, 20, 30 extra houses and we would like them built in this way, to be built for local people’.”*

*Mr Cameron, who was being interviewed in his Oxfordshire constituency, denied that the reforms would lead to large swathes of the countryside being built on.*

*He told BBC1’s Countryfile programme: “Here we are in west Oxfordshire one of the most beautiful parts of our country, set in some of England’s finest countryside. I would no more put that at risk than I would put at risk my own family.*

*“I care deeply about our countryside and environment. Our vision is one where we give communities much more say, much more control.”*

Now let me inform you of what is happening in Hart District where I live. Hart is a largely rural district that has been named the best place to live in the country four years running.

Hart does not have a local plan, apparently because its last submission to the inspector was rejected on the grounds that they had not adequately fulfilled the “duty to cooperate”. I guess the first point to note is that if planning had really changed to be a bottom up process with local people in control, then it would not have to submit its plan to central Government for approval.

However, the council is now working more closely with its neighbours to create its local plan from a Strategic Housing Market Assessment (SHMA) and Objective Assessment of Housing Need (OAHN). There are a number of significant issues with this Government mandated approach.

1. The starting point for this is mandated to be the CLG household/population projections. These figures essentially take past levels of household growth and project them forwards. In our housing market area, past development was above the regional and national averages. So, in essence, because we have built more houses in the past, we have to build even more in the future, which is an absurd policy which will inevitably lead to all of our valuable green spaces being concreted over.
2. The SHMA manipulates those figures in a number of ways to arrive at the future housing needs and all of the manipulations act to push up housing “need” for the Housing Market Area (HMA):

* Arbitrarily adjusts CLG numbers upwards because apparently the government has always under-estimated future growth
* Cherry picks inward migration data to cover only the years in which large scale building was going on and ignore the most recent trends that shows that there was net outward migration from the area even though a significant number of extra houses were delivered
* Assumes average household size will fall in the future when most recent census shows average household size has risen over the period 2001-2011

The impact of these arbitrary changes are to push up the annual housing requirement for the whole HMA from 790 to 925

1. The SHMA then makes further unreasonable assumptions about jobs growth:

* In the period 1998-2008, the HMA generated 7,100 jobs or 645 per annum. This period was part of the longest uninterrupted period of economic growth that ended in a spectacular bust and was thus unsustainable.
* The SHMA totally ignores the period 2009-2012 when only 200 jobs were created or 50 per annum
* The SHMA then takes a dubious survey and suggests that future job growth from 2011 to 2031 could be 1,560 per annum, more than double the rate achieved during boom times
* The SHMA then arbitrarily picks a rate of jobs growth of 1,130 per annum as its central forecast, that is nearly double what was achieved between 1998-2008.

The impact of this assumption is that the housing requirement for the HMA jumps again to 1,180 houses per annum.

Taken together, these assumptions increase the annual housing requirement from 790 per annum to 1,180 per annum or a ~50% increase over and above the CLG starting point. This is clearly ridiculous and is putting intolerable pressure on local authorities.

All of this is leading Hart to a position where it is putting forward as its main option for the Local Plan a 5,000 dwelling scheme to concrete over much of Winchfield against the wishes of the local residents. This is despite the area being adjacent to two SSSI’s, containing many Sites of Interest to Nature Conservation and within the zone of influence of the Thames Valley Heath SPA. This scheme will not adequately cater for the needs of the growing elderly population, nor will it meet the backlog of affordable housing in the area.  There are dozens of vacant office blocks dotted throughout the district, but these are not considered worthy of brownfield development. Moreover, our roads are congested, our schools are full, the rail line is at capacity, the doctor’s surgeries are full, many other pieces of infrastructure are creaking and the whole area is prone to flooding.

Moreover, the district currently has a funding shortfall of £78m on its infrastructure requirements, before the new town is taken into account. The funding from the CIL/S106 for these houses will not cover even the existing shortfall, let alone cover the additional infrastructure requirements of new roads, schools, railway facilities, bridges, hospitals and so on that will be required.

It is time to call a halt to this system and follow a different set of policies. I would like to see you adopt the following policies:

1. Allow councils to create local plans based on the future needs of the current population, not have to assume lots of net inward migration
2. Allow councils to reject SHMA’s and OAHN’s if to meet them would mean that much of the countryside in an area is concreted over by mandating a much stronger focus on higher density development on brownfield sites
3. Impose a moratorium on further development unless and until the funding for infrastructure matches the requirement
4. Do more to promote economic development in the North as opposed to London and the South East to relieve the pressure on areas like this – building more homes there and regenerating brownfield sites in run down areas is far preferable to concreting over the remaining green parts of the South East

It is likely that planning will become an election issue. Can you please explain to me what your policies are, and those of your party so that it can inform my vote in May.

I look forward to your response.

Yours sincerely,

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