

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

The Council has received a large number of questions from the public. We have sought to group responses where we feel it adds context and the questions overlap.

In view of the timescale allowed for Public Question time it has been decided to draft a written response in advance of the meeting. Copies of the questions and answers will be given to all Councillors, the public who attend the meeting, and will be published on our web site.

We hope that this will make best use of the meeting's time and ask that these responses be taken as read. This is to help Questioners prepare for any supplementary questions that they may have. The Chairman will then ask Questioners, in the order in which they were received, if they have a supplementary question. The Portfolio Holder will then give a response. Any supplementary question must arise directly out of the original question and reply.

#### QUESTIONS AND PREPARED RESPONSES

##### Overall Context

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 will examine the final Local Plan. A local planning authority should submit a plan for examination that it considers is "sound" – 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.

One of the key objectives of the National Planning Policy Framework (NPPF) is to boost significantly the supply of housing. This requires local planning authorities to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF, including identifying key sites which are critical to the delivery of the housing strategy over the plan period. The NPPF recognises that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities.

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

##### *The Strategic Housing Market Assessment (SHMA)*

##### *David Turver (Question – Process a)-e)*

a) **Background:** I would like to understand the process that was adopted to select Wessex Economics to conduct the SHMA. Their website (<http://www.wessex-economics.co.uk/about/>) indicates that they have extensive experience in the property sector, but the principal's background is with DTZ a leading provider of services to investors and developers. I am concerned that such a company will be biased towards "development" and not sympathetic to the needs of local people or the environment.

**Question:** What process was followed to select Wessex Economics and what process was followed to determine that Wessex did not have inappropriate relationships with or financial interests in any housing developers?

Hart, Rushmoor and Surrey Heath jointly commissioned the SHMA via a full tendering process. Officers from all three authorities identified seven companies with SHMA expertise. They were all invited to tender for the project, one of the requirements being that the study needed to be prepared in accordance with Government guidance. Wessex Economics submitted the best tender in terms of addressing the requirements of the brief.

The Council does not believe that the consultant is biased towards development.

Firstly, the consultant has a strong history of working for the public sector as well as the private sector. Two thirds of the consultant's clients – both now at Wessex Economics and previously at DTZ – have always been public sector clients, including local government, central government and development agencies. The fact that the consultant works for the private sector as well as the public sector is an advantage for public sector clients since he knows how the private sector thinks and operates.

In terms of expertise for this particular appointment the consultant has undertaken SHMAs for:

- all six local authorities in Berkshire;
- the six South Hampshire authorities;
- the five central Hampshire authorities and New Forest;
- all the authorities in Kent and Medway;
- all the authorities in Northumberland;
- all the East Sussex authorities;
- the four authorities in the West of England (Greater Bristol); and
- previous studies for Hart, Rushmoor and Surrey Heath.

His pedigree is considered unimpeachable.

Second, regardless of past experience with other clients, the SHMA study had to be prepared to a robust methodology in line with Government guidance. The current SHMA study has been scrutinised not just by Hart, but also by Rushmoor and Surrey Heath. The assessment is that this is a sound and professional SHMA.

Where data needs to be interpreted, then the Council is satisfied that rational, justifiable conclusions have been reached, without any bias towards development. For example, one of the drivers for higher housing need figures is employment forecasts. In line with precedent and

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

experience, the consultant has highlighted that guidance indicates that historic trends and/or employment forecasts should be considered and has come to a considered judgement on the weight that should be attached to each, while ensuring that the Council can demonstrate that it is complying with the NPPF which states that local authorities need to plan positively for economic growth.

**The SHMA has recently been independently validated (See attached letter of confirmation). The Cambridge Centre for Housing and Planning Research (CCHPR) is a research Centre within the Department of Land Economy, University of Cambridge. It was established in 1990 (originally as the Property Research Unit) with the objective of undertaking policy-oriented research on all issues affecting housing and land use and has an international reputation as a leading academic research institution in the fields of housing and planning.**

**It has over twenty years experience with a proven track record of providing the evidence and analysis to influence and support better policy and practice. Its specialisms include:**

- **Social housing and low cost home ownership**
- **Section 106 and affordable housing development**
- **Understanding local housing markets**
- **The role of home ownership and private renting**
- **Policy analysis backed by unrivalled social housing statistics**

**Its findings have been accepted as authoritative verification by Planning Inspectors.**

b) **Background:** In the appendix (A1.2), the process for stakeholder engagement is set out. The only people consulted were from local authorities or from developers and housing associations or their representatives. If the main people consulted are the salivating developers, it cannot be a surprise that their input errs towards the need to build more.

**Question:** How can the SHMA be a truly Objective Assessment of Housing Need if the main consultees have a vested interest in the outcome?

As a piece of evidence, rather than policy, it is not necessary to consult on the SHMA because in itself it will be tested independently for soundness by an Inspector appointed by the Secretary of State at the Local Plan examination. Indeed, it is there that developers who inevitably will seek to demonstrate that it does not deliver enough housing will challenge it.

That said, Hart, Rushmoor, and Surrey Heath did conduct a targeted consultation on the draft SHMA, with those types of stakeholders likely to have expertise on SHMAs and an interest in the findings of the Hart/Rushmoor/Surrey Heath SHMA, potentially with a view to raising challenges to the SHMA. Relevant officers and Councillors have read the reports, had dialogue with the consultants, and are satisfied with the approach taken.

c) **Background:** The SHMA is still in draft form on the Hart website.

**Question:** Why is such a fundamental document as the Strategic Options for Housing Growth is being based on a flawed, unchallenged, draft document?

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

The draft SHMA is being finalised in light of this targeted consultation. It is known from the consultants that the Objectively Assessed Housing Needs (OAHN) figures will not change in the final version, so it forms the correct basis for taking the plan forward in terms of planning for housing. Furthermore, independent verification of the SHMA has been sought and the findings suggest that in itself it is robust.

d) **Background:** Section 1.6 of the SHMA says “For a local plan to be considered sound in terms of overall housing provision, it first needs to have identified the full, objectively assessed need for housing in the housing market area. Local authorities then need to meet these needs in full and demonstrate how they will be met, **or provide robust evidence that they cannot be delivered.**”

**Question:** What evidence is the council producing to demonstrate the objectively assessed housing need is not deliverable?

The existence of SHLAA sites for more than the OAHN is of itself prima facie evidence of deliverability. In order to demonstrate non-deliverability of SHLAA sites it would be necessary to prove to the satisfaction of an Inspector at Examination in Public that the sites would be unsustainable in NPPF terms. Each SHLAA site is judged on its merits in planning terms i.e. Is it suitable (can it be developed / is development viable)? Does it present any constraints (typically include flood risk, landscape and environmental considerations)? Is it sustainable (can key infrastructure be provided, is it located close to services)? The evaluation can be deemed to be ‘fair’ – any sites that could not be delivered will be eliminated, and the Council will demonstrate this where it proves to be the case.

e) **Background:** The starting point for the SHMA is the CLG forward population projections. These essentially project forward past trends.

**Question:** Notwithstanding this is the “preferred approach” in the NPPG, what evidence is there that basing the future need of an area on past population growth is the best or most desirable approach and has the council considered working with other councils to challenge the government mandated approach in the courts?

In terms of anticipating housing needs going forward one has to start somewhere, and the CLG ‘household projections’ data series, whilst not 100% perfect, is generally recognised as the best available starting-point. The CLG Household Projections are derived from population forecasts supplied by the Office for National Statistics. Household Projections are quite sophisticated and seek to measure and calibrate inter alia the effects of immigration and changes in household headship.

A valid OAHN projection will (as at 2013/14) combine the 2008- and 2011-based Household Projections to come up with a credible OAHN for the area in question. Leading academic institutions and planning consultancies that are active in the field use such an approach. It is not known whether any Council, or group of Councils, has sought to challenge the government’s ‘mandated approach’.

#### **David Turver (Question Content a) – m)**

There are a large number of tautologies and flawed assumptions in the SHMA which I would like to draw out and thus challenge the overall conclusion.

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

- a) **Background:** Surrey Heath and Rushmoor are both more highly developed than Hart. **Question:** What is the rationale for grouping largely rural Hart with such heavily built up areas? Would it not be more appropriate to group Hart with more rural districts to the west and south?

Government Guidance indicates that SHMAs should be prepared for functional housing market areas. Wessex Economics undertook studies for Hart, Rushmoor and Surrey Heath to identify the relevant housing market area within which the authority is located. The functional ties in terms of migration and travel to work patterns tie Hart, Rushmoor and Surrey Heath more strongly together than the linkages with any other local authorities. (see Section 2 and Appendix B of the Consultation Draft SHMA)

There is no advantage in seeking to disengage from the current Hart/Rushmoor/Surrey Heath housing market area. Firstly, the links are too strong and there is only a weak link with Basingstoke and almost no link with East Hampshire. East Hampshire has much stronger links with Winchester and this has been accepted through its Local Plan process. Secondly, both East Hampshire/Winchester and Basingstoke have much higher objectively assessed housing needs and housing targets. Therefore, even if a stronger link with either of these two adjoining housing market areas could be established, it would almost inevitably mean that Hart's housing target would increase. Furthermore, it would not preclude Surrey Heath and Rushmoor from still pursuing objections to any Hart Local Plan over the need for the Hart Local Plan to accommodate unmet adjoining housing market needs.

In conclusion, Hart/Rushmoor/Surrey Heath are collectively satisfied that the emerging SHMA is a robust piece of work in line with Government guidance. There is always scope to debate a piece of work like the SHMA, the data used, the assumptions made etc. Some will challenge whether the housing market area has been correctly identified, some will argue that the OAHN is too high, and some will argue it is too low (indeed there are consultation responses to that effect). Ultimately it is for a Planning Inspector to decide if the evidence is robust when the plan is examined.

- b) **Background:** The report uses as its starting point for the OAHN the official government projections for the number of households in the Housing Market Area (HMA) that includes Hart, Rushmoor and Surrey Heath which states that the total number of new homes required per annum is 790. The report then states that the ONS usually understates these requirements so it makes an arbitrary adjustment upwards to 925 homes per annum. However, the government website (<https://www.gov.uk/household-projections-notes-and-definitions-for-data-analysts>) states that "The current methodology in England reflects work to improve the household projections outputs and methods to better meet user needs".

**Question:** What is the justification for a small economics consultancy to challenge the official government figures when the government itself asserts that it has improved its methods and outputs, especially when the assumption leads to an additional 135 dwellings per annum being required across the whole HMA over a 20 year period, a total of 2,700 dwellings?

As explained in the report, (para 7.25) National Planning Policy Guidance requires that those preparing reports assessing OAHN consider whether the ONS projections *require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past*

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

trends. This is endorsed by professional bodies such as LGA and RTPI. Wessex Economics has to adhere to the Guidance issued by Government.

The Consultation Draft SHMA is transparent in what adjustments Wessex Economics have made and why. The adjustments made are not arbitrary. Indeed they have been carefully considered and debated. It is worth noting that 2012-based Household Projections are likely to be issued soon by CLG which will provide household projections through to 2037. If these are issued before an Inspection of the Hart Local Plan the implications of these projections for the assessment of OAHN will need to be considered.

c) **Background:** The summary in section 3 notes that the level of household growth in Hart at 10% over the past 10 years has been higher than the regional and national averages. This growth in households can only have been accommodated by new building (e.g. Elvetham Heath in Fleet and St Mary's Park in Hartley Wintney). **Question:** Why is it that we need to base our future housing need on past rates of development that were above the regional and national average, this can only lead to the conclusion that over time, more building will lead to even more building which is absurd and cannot be "sustainable"?

There are fundamentally three components to household growth; the natural change in the population (births minus deaths); net migration; and the propensity to form households. Clearly an absence of new housebuilding could constrain net in-migration; and a significant volume of new housebuilding will make it more possible to accommodate an increase in net-migration. Both past constraints on housing supply and past provision of new housing supply are factors that play a part in migration patterns. This will have an influence on the population and household projections at local authority level.

It is important to emphasise the OAHN is for the Housing Market Area as a whole and not for individual authorities. Figure 7.5 shows levels of housing completions across the Housing Market Area as a whole. For this element of the analysis it is not particularly relevant to the analysis which authority these dwellings are built in.

d) **Background:** Section 7 of the report deals with migration into and out of the Surrey Heath, Rushmoor and Hart Housing Market Area (HMA). Figure 7.5 draws a correlation between migration and housing completions. In essence, if you build more houses more people will come to the area. This is perhaps an obvious point. For Hart in particular, they use the years of 2005-2010 as the years that are most representative of the trend of migration (years in which significant building in Elvetham Heath and other places was taking place). More recent trends in Figure 7.4 shows a slowdown of migration and indeed a net outward migration from Hart during 2009-2011 and a net outward migration from the whole of the HMA in 2011-12. In essence they are saying in para 7.35 that we must assume levels of house-building during the credit boom (itself hardly sustainable) to support the population growth of that time in order to predict future population growth for which we will then need to build even more houses. This is an absurd tautology which leads to a gross distortion of underlying need. **Question:** Why are we basing future need on the years with the highest inward migration that happened during an unsustainable credit boom, and not the most recent years with lower migration which will lead to a more economically and environmentally sustainable solution?

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

The conclusion on net migration and housebuilding as set out in the box following Figure 7.5 sets out our assessment of whether reduced levels of housing supply has had an effect on migration patterns. As stated previously, National Planning Policy Guidance requires Wessex Economics to assess whether there are factors affecting local demography and household formation rates which are not captured in past trends that we should take account of in assessing OAHN.

The reduced rates of housebuilding 2007-12 is a relevant factor that Wessex Economics is required to consider. The Government has set out in Guidance how 'housing need' is to be determined. Failure to pay attention to Government Guidance will lead to any Local Plan being found unsound. Under such circumstances local authorities are likely to find that they will be subject to speculative applications for residential development that are very likely to be approved on appeal if the local authority refuses planning permission.

Paragraph 7.36 explains the judgement Wessex Economics have come to in the light of the evidence. Successive Governments and professional planning bodies (eg RTPI) have been of the view that at least since 2000 the number of homes being built in England has been less than that required to adequately house the existing and anticipated population of the country.

e) **Background:** Figure 7.7 shows that the trend in household size as measured by the census is slightly upward for the period from 2001 to 2011. However, all of the forward projections reverse this trend and predict a further fall in average household size without any justification. Wessex have taken some mid-point of the CLG projections. **Question:** Why can't we base our projected household size on the most recent Census data rather than data that is 30 years old and thus reduce our OAHN?

The available evidence shows that there has been an element of suppressed household formation in recent years. It would be unsafe to assume that recent patterns of household formation will continue into the future. Government is very likely to take the view that some of this recent change in household formation is not the expression of the personal preferences of single people or couples, but are a reflection of housing shortage and affordability issues.

f) **Background:** Para 7.63 assumes as its base level a higher rate of future job growth (700 p.a.) in the future than was achieved (650 p.a.) during the exceptional, unsustainable boom years of 1998-2008 when our rate of building was already above regional and national averages. Paras 7.68 and 7.69 then further exaggerate the future level of job growth by suggesting it could rise to 1,560 jobs per annum, more than double the Scenario 1 estimate which is based on employment growth that occurred during the largest, unsustainable credit boom in history. The final jobs growth based estimate used is then a mid-point between the already over-estimated base assumption and the wildly exaggerated high end projection. **Question:** Why aren't we using employment projections based on more sustainable economic and environmental assumptions which probably ought to be lower than those achieved between 1998-2008?

The National Planning Policy Framework requires local authorities to plan positively for economic development. Local Plan policies that merely assume that the authority should plan simply for historic rates of job growth are unlikely to be found sound, particularly when

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

forecasts of future job growth produced by Forecasting Houses indicate significant future job growth.

It is important to realise that anticipated job growth is deemed to be largely independent of the number of houses. Job growth reflects the demand of employers for labour; and we have two sources of insight into what those requirements may be in future; historic trends in employment growth and employment forecasts prepared by forecasting houses. Thus there is no presumption that building homes is the source of job growth in the HMA area.

Rather job growth is associated with the anticipated growth in demand for labour of local employers. National Planning Policy Guidance requires an assessment of whether the local labour force is sufficiently large to meet these demands. In answering this question allowance has to be made for the ageing of the workforce which means that the number of people available for work per '000 population is falling over time. The upward adjustment reflects the requirement set out on page 10 of National Planning Policy Guidance that consideration is given to the whether the growth in population is sufficient to meet the anticipated growth in labour demand.

Planning Policy Guidance requires those undertaking SHMAs to 'make an assessment on the basis of past trends and/or economic forecasts as appropriate.'. This is the approach adopted by Wessex Economics. The Consultation Draft SHMA explains in detail the different scenarios for employment growth examined, and Wessex Economics reasons for adopting Scenario 2 as the basis for forward planning.

g) **Background:** Para 7.81 sets out six ways in which jobs can increase without increasing the need for additional housing. Para 7.83 says the modelling has taken account of only one of those factors. This again has the impact of increasing the housing stock required in the OAHN. **Question:** Why can't we take account of all six ways in which jobs can increase without building more housing?

It is possible to make reasonable assumptions for changes in activity rates, and this is easily incorporated into the demographic modelling. Were one to start modelling all sorts of options with assumptions regarding the full range of variables that influence the relationship between jobs and resident workforce, it would produce great complexity and obscure the choices that policy makers have to face.

h) **Background:** Figure 8.9 suggests Hart needs to build around 260 affordable homes per annum if the backlog is to be cleared in five years as part of the overall 370 homes per annum required. **Question:** Please explain how building a Barratts estate new town in Winchfield will address this affordable requirement?

The affordable housing requirement has been subject to review in response to consultation responses and has been revised. The figures for affordable rented housing are now for 72 affordable homes for rent pa in Hart over the 20 year plan period compared to the OAHN figure of 370 homes pa in Hart. As with large development there would be a requirement to provide affordable housing in the region of 40% of the total development.



## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

i) **Background:** The demographics of the district are changing. According to the SHMA, by 2031, there will be an additional 10,000 people over 60 (including more than 6,850 over 75) expected to be living in the district and an extra 3,620 people who will be suffering from dementia or have some sort of mobility problem. Section 9 of the SHMA suggests that future housing stock should be built to broadly reflect the existing stock. Evidence from developers such as Churchill and McCarthy and Stone suggests (<http://www.mccarthyandstone.co.uk/documents/research%20and%20policy/oorh%20full%20report%20may%202011.pdf>) that remote estate locations are not good places to house the elderly and infirm. **Question:** What evidence base is there to suggest that the needs of the future population will be met by past housing stock? What evidence has the council collected to determine the best types of accommodation and the best places to build those types of housing to meet the needs of the elderly and infirm?

The SHMA does not embed a housing mix for all time and will be reviewed as time goes on. The development industry is reflecting the demographic changes identified by developments such as the McCarthy and Stone and Churchill developments going ahead in Fleet.

j) **Background:** Para 7.119 states the following “These market signals point to the need to identify and address the demographic and economic need for housing; they do not themselves provide a quantifiable need for housing (and indeed there is no recognised methodology for this)”. **Question:** If there is no recognised methodology for providing a quantifiable need for housing, why are we following an approach that is artificially inflating the housing need for the area that will inevitably lead to the destruction of the most attractive parts of the district?

Para 7.119 is saying that no further uplift to the objectively assessed housing need figure is needed once market signals are taken into account. The comment about there being no recognised methodology relates solely to the question of how to factor in market signals, not the SHMA methodology as a whole.

k) **Background:** The Localism Act requires local authorities to maintain a list of assets of community value which have been nominated by the local community. **Question:** Where can the Hart register of assets of community value be found, and can I nominate the Winchfield area as an asset of community value?

The Hart register of Assets of community value can be found at:  
<http://www.hart.gov.uk/conservation-listed-buildings>

Nominations for assets of community value can be made by parish councils or groups with a connection with the community. Individuals cannot nominate community assets.

The legislation for assets of community value is aimed at individual assets rather than whole areas, i.e. buildings or amenities that play a vital role in local life such as community centres, libraries, swimming pools, village shops, markets or pubs. The purpose being that should that asset come up for sale, the local community has an opportunity to bid for it. Residential dwellings are exempt from being placed on the register unless they are ancillary to a main use (e.g. landlord accommodation above a pub).

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

The Council will carefully consider any applications to register an asset of community value against the legislation, but it is difficult to see how an entire area could qualify.

l) **Question:** Can the council please commence activity to protect the Winchfield area as Green Belt on the following grounds:

- To check the unrestricted sprawl of built-up areas.
- To safeguard the surrounding countryside from further encroachment.
- To prevent neighbouring towns from merging into one another.
- To preserve the special character of historic towns.

The Council does not want to see settlements coalesce, and it will use the local plan to ensure this does not happen. With regards Green Belt, the NPPF is clear that new Green Belt should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions (para 82). So if we were to consider creating new Green Belt, it would have to be in that context. But justifying a new Green Belt would by no means be straightforward given the additional criteria in the NPPF at para 82:

If proposing a new Green Belt, local planning authorities should:

- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
- show how the Green Belt would meet the other objectives of the Framework.

In the event that a new settlement at Winchfield proceeds, the Council will consider whether a Green Belt around it will be appropriate.

m) **Background:** The information on the environmentally sensitive areas of Hart can be found here:

[http://www.hart.gov.uk/sites/default/files/4\\_The\\_Council/Policies\\_and\\_published\\_documents/Planning\\_policy/SA%20Scoping%20Appendix%203%20Baseline%20Information.pdf](http://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/SA%20Scoping%20Appendix%203%20Baseline%20Information.pdf) (p20).

As can be seen from the map, the proposed development is within the Zone of Influence of the Thames Valley Heath SPA; contains numerous Sites of Interest to Nature Conservation (SINCs) and is so close to the SSSI sites at Odiham Common and Basingstoke Canal that it must be damaging to those sites. **Question:** Why is the council intent on pursuing a preferred strategy that will in all likelihood fall foul of legislation to protect our environment?

The Council is very concerned about impacts on the environment, and is not looking to submit a plan that falls foul of environment legislation. The testing process will explore the deliverability of the strategy, including the new settlement option, looking at a number of factors including environmental impacts and mitigation. The plan will be subject to a Strategic

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

Environmental Assessment, and to a Habitats Regulations Assessment process, both designed to protect the environment as enshrined in European law. Natural England as a statutory consultee will be consulted on the plan, along with a host of other organisations with an interest in ecology and biodiversity.

Indeed, with regard to the Thames Basin Heath Special Protection Area (SPA) we are the only local authority challenging Natural England's assumption that the SANGs and access management mitigation strategy will work regardless of housing growth levels. So we are being far more pro-active than other local authorities affected by the Thames Basin Heaths SPA to ensure that the plan does not fall foul of environmental legislation.

#### Housing Options Paper

#### **Guy Bewsher (Question 1, 2, 3 and 4)**

1. Even after the Council had weighted the responses, the Consultation Process resulted in only 22% of respondents voting in favour of a New Town in Winchfield.
  - a. With such a low vote in favour of the New Town option how does the Council justify ignoring the wishes of the other 78% of the population? And:
  - b. I note from the response from South Warnborough Parish Council that naming Winchfield in the Consultation document materially affected their response. Had Daryl Phillips taken the advice of the Parish Council Chairman on the 6<sup>th</sup> August and not named Winchfield, or also named the 203 hectares available at Lodge Farm, does the Council accept that the vote favouring Option 4 might have been even lower?
2. Given that Hart requires over 360 houses per year to be built, and Harts favoured contractor states it can only deliver 250 a year, how and where will the shortfall be delivered?
3. Can the Council assure residents that all owners of land on the edges of all the larger settlements of Fleet, Yateley, Blackwater and Hook, (including the MOD), have been contacted, and been given a proper opportunity to promote their land for housing development in the future - such that a proper and transparent sequential assessment can be undertaken to properly illustrate and understand the implications of new development of this scale on the infrastructure, services, facilities and natural environment of each option site.
4. Can the Council confirm that the consultation questionnaires used by Hart Council for residents to give their opinions were independently audited to ensure neutrality in the way the information was presented?

#### **Caroline Hoffman (Question 1 and 2)**

1. Why is it that when the housing Options went out for public consultation, the questionnaire was not site-specific in its Option 4 section? No mention was made of Winchfield being considered.
2. Why is the Council now being asked to 'test' the site-specific new settlement of Winchfield, especially when a large site like Lodge Farm has recently been offered for consideration?

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

##### **Tristram Cary (Question 1)**

The Preferred Options Paper J (para 5.9) states that Winchfield is the only area in Hart where a sustainable New Town could be realistically delivered. We assume that a statement of such fundamental importance to the future of the whole district has not been made without a detailed comparative analysis of all the feasible sites where a new settlement could be built. What sites have been evaluated? What objective evaluation criteria (including their weightings) were used to compare these sites? Who developed the evaluation criteria and weightings? How were the evaluation criteria and weightings tested and approved to ensure that they served the best interests of Hart and its inhabitants?

##### **Henry Chandler (Question 1)**

###### Question 1

Given the current status in the Local Planning Process do the committee have any comment as to why Barratts have chosen now to submit such a comprehensive proposal against one option and why they or any other developers/land owners have not been actively encouraged to present equivalents for other Options to allow stakeholders to have a richer understanding of the deliver-ability and suitability of the Options?

##### **Sue Hewlett-Smith**

Can Hart explain how and why they made the decision to nominate the Winchfield New Town option as the only viable option to their planning requirements with such haste and secrecy and how it got to the stage of a full colour brochure being produced before anyone knew anything. Obviously Barrett has one priority which is to make money for its shareholders. Has Hart been in discussions with Barrett and why were the other options discarded with such haste and lack of transparency?

How does Hart think that 5,000 new homes will fit into 500 acres with schools, shops, open spaces etc when a new area in Basingstoke with only 3,900 houses is being built on 2,000 acres?

If this goes ahead what provisions will Hart be making to ensure that life can continue for the people of Winchfield during the 20 years of the build?

##### **Hamish Elvidge**

As local residents we constantly hear the question 'Why is Hart not building houses on more brownfield and empty office sites?'

Could you please answer the following questions:

1. How many identified 'brownfield' and 'empty office' sites are there in Hart and where are they located?
2. How many houses do you consider could be built on these sites?
3. What stage (in planning terms) have these sites reached?

##### **Ian Coster (Question 2)**

2. Lodge Farm, south of Hook, put in a proposal in October to Hart. This apparently was 'too late' to be considered by the Council.

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

Could the Council please tell us:

- the date it received this proposal,
- whether or not the Council had a published closing date for sites to be put forward,
- how many houses this proposal could accommodate,
- and whether or not it is going to be considered?

#### **David Salisbury**

“How can it be justifiable for the Council to select a specific site for development of a new town of 10,000 plus residents after only a cursory and general public consultation on strategy without any specifics, no serious consideration of alternatives and no consultation whatsoever on the choice of site?”

#### **Barrie England (Question 1 and 5)**

- (1) What sites other than Winchfield have been considered for a new settlement and what are the reasons for rejecting them?

The other option that has come forward for a new settlement is at Lodge Farm, near North Warnborough. This site was submitted on 10<sup>th</sup> October 2014. It is not a directly comparable proposal, being less than half the size of the Winchfield proposal and with obvious sustainability weaknesses compared to the Winchfield option, key ones being the lack of a railway station, and a flood plain through the heart of the site. That said, no options have been rejected at this stage and the Lodge Farm proposal will be looked at more closely as part of a process of evaluating alternative strategies and sites.

- (5) Who are the landowners offering land for development in Winchfield, and where do they live?

Submissions to the SHLAA usually include information on land owners, which can be viewed on request at the Council offices.

#### **Sue Beagley (Question 2)**

Will the Council carry out the same testing at SHL110 (Lodge Farm) during the testing period as this is a later addition of land availability suitable for a new settlement option. Or does any arrangement they have with, or preference for Barratts only include Greenfield sites in Winchfield?

#### **Matthew Evans**

1) Can the Council provide evidence of the depth of work carried out to consider other potential solutions to the housing question for Hart. It is clear it is important for a Local Plan to be agreed and submitted to ensure Hart retains control over further development, as we should know what is best for our area. My concern is that this potential new town is an easy option as fits only the requirement to build houses. While what is best for the district as a whole has been ignored. We have numerous towns that are seeing shop closures and are under utilised and yet a new town will quicken their decline and lead to a more inefficient district. Brown field and council land and old office buildings can now be considered and would surely be a better use of existing infrastructure. The potential to encourage this development while pooling contributions

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

for section 106 and allowing a clear vision for the distribution of additional infrastructure to appropriate areas should at least receive a fair examination too. Please can you explain steps taken to consider this approach?

2) Can you clarify that all other options are also being considered and will be worked through in the same detail as the potential new town? It has been stated that all options are still currently open for consideration.

3) Why is it that the Council is being dictated to by a developer's plan when there has been little or no support for this plan in the previous draft plan and after the recent questionnaire in which only 1% of the Hart population ticked the new town box?

#### **Andrew Renshaw (Question 3)**

Can we be given details of the new settlement at Cambourne, Cambridgeshire, which Cllr Radley illustrated at Cabinet as an example of the sort of new settlement that he thought Hart could achieve at Winchfield? For instance, what is the area of land involved there, the timescale of development, and the proximity of the nearest railway station?

The Housing Options Consultation paper made clear at the outset that it is likely that a combination of growth options will need to be considered if the District is to meet its housing needs. The scale of development currently proposed is now far greater than that envisaged in the withdrawn Core Strategy. The evidence is that Council cannot meet its housing needs by focusing new development solely within existing settlements or on brownfield land alone – there is insufficient land identified in the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA is publicized at <http://www.hart.gov.uk/Evidence-base> (the SHLAA is a register of land that site owners or promoters confirm is available for development). The Council will therefore need to follow a distribution approach involving all distribution options – including the identification of a large element of greenfield development.

[http://www.hart.gov.uk/sites/default/files/4\\_The\\_Council/Council\\_meetings/K\\_November/14%2011%20C%20Council%20Local%20Plan%20housing%20Strategy%20and%20maps.pdf](http://www.hart.gov.uk/sites/default/files/4_The_Council/Council_meetings/K_November/14%2011%20C%20Council%20Local%20Plan%20housing%20Strategy%20and%20maps.pdf).

The Options Paper Consultation was non-site specific albeit it specifically highlighted that the start point would be land that had been identified by landowners as being available for development (SHLAA). With respect to Option 4 in the Options Paper reference was made to the past history and combination of sites offered by landowners in Winchfield. The availability of this land is well known to both District Councillors and local parish councils, and has been published for some time on Hart's web site.

The Consultation asked everyone in Hart to consider a range of distribution **options**, to indicate which they would prefer - or suggest any other ideas that they might have. It included a renewed call for all landowners to put forward any new sites for consideration, so that the best options could be identified. This was publicized in the press, on the Council's web site, and also in Hart News - the latter having been delivered to every household in Hart. All organisations and individuals on the Local Plan mailing list were notified.

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

The questionnaire leaflet that was used in association with the Option Paper Consultation was prepared and reviewed by a group of Officers, Councillors, and representatives of the Parish Councils.

The Options Paper was not a call for a vote or referendum. The Council has also not weighted any responses albeit there were some clear preferences expressed across the district, which Councillors may take into account.

The Council is only allowed to mention sites that are available (to be considered available and developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged). There are a number of vacant and underused “brownfield” sites identified in the SHMA. The SHMA identifies their capacity and the assessment is that taking into account “windfalls” these sites could deliver around 750 dwellings through the Local Plan (Option 1). Unfortunately, only land identified in the SHMA can be counted and therefore whilst it may be aspirational for other vacant or underused sites to be brought forward for development, they cannot be relied upon or counted at this stage.

Winchfield is put forward for testing as the landowners/site promoters have indicated it is available. Winchfield is the only currently available candidate. There is simply no alternative site that has been advanced as being available if the new settlement option is to be tested in the form as envisaged by Option 4. Winchfield may fail the test and other major sites may well materialize, in which case they will be tested as well and provide a comparison. But not to test any site will delay the formation of a plan by many months, which leaves the district exposed to uncontrolled development without planned infrastructure - including at Winchfield.

Meanwhile Barrett’s have put together a vision document, to suggest how these sites might make a feasible settlement. They have done so as a response to the Options Paper consultation to ensure that the option of a new settlement is given consideration. There has however, been no decision made and there is no proposal or planning application. It is important to first test to see if this option is feasible and deliverable.

The Council did not receive the Lodge Farm submission until 10 October 2014. It therefore could not have influenced the initial consultation process. Lodge Farm has a suggested yield of 1,700 houses (the site promoter submission paper work suggests only 1,500). This is some way below the threshold for a new settlement. Despite its size in area, it is suspected that this is an optimistic figure considering the constraint of the flood plain but this still needs to be assessed properly against all constraints, as all SHLAA sites are in an ongoing process.

An example of a well laid out development is Cambourne. It is a new settlement in Cambridgeshire. It has been built in distinct stages, the first started as far back as 1998 (having received planning permission in 1996). The most recent development stage at Upper Cambourne is perhaps more relevant, started in 2008 and targeted for completion in 2016. The Cambourne development will deliver a total of 4,250 new homes.

In regards to hectareage, Wikipedia reliably informs us that the entire combined site at Cambourne is 400 ha, though this land is also used for industrial estates and a golf course. The

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

land given over for residential use is some 133ha.

The nearest mainline railway station is located at St Neots and then Cambridge itself, some 11 miles away.

#### **Risks and unmet Housing Need**

##### **Tristram Carey (Question 2)**

In the Hart Local Plan: Housing Development Options Consultation dated July 2014 (Paper C), Appendix I Option 4 (Risks) (page 58), the last Risk states that "proposing a large long-term strategic development may encourage one or more neighbouring local authorities to seek help in meeting their own housing requirements under the 'duty to cooperate' ". However this risk, with its serious consequences for the whole of Hart, was omitted from the paper on which residents were asked to vote. In that paper the only con against Option 4 was that "it could take several years before homes are built, so would need to be combined with another option". Discussing the options with residents over the last two months I think it is clear that many people who voted for Option 4 would not have done so if they had been made aware of the high probability that a New Town would result in a demand for Hart to help meet the housing requirements of other districts in the SHMA area, thus seriously jeopardising Hart's rural nature. In its questionnaire summary why did the council omit the serious risk of attracting extra housing demand in favour of the 'non-risk' that Option 4 would need to be combined with other Options? Who decided to omit the risk and how was the decision reviewed and ratified?

##### **Henry Chandler (Question 2)**

As the representation of the Hart community and its stakeholders, what assessment has the council undertaken and considered necessary to allow a comprehensive Local Plan that meets local originated needs in development as a priority rather than what appears to be an solely externally driven agenda.

##### **Philip Todd**

Will the 'New Settlement' option provide a good match for the local housing needs that have been identified in the Strategic Housing Market Assessment or will it merely boost growth whilst doing little to protect other communities from speculative planning proposals to build the very high proportions of both smaller and affordable homes that the SHMA identifies as being needed?

##### **Andrew Ewbank**

If a large scale new settlement somewhere in Hart (not necessarily in Winchfield) went ahead, the 'duty to co-operate' with neighbouring local authorities would come into play. A new settlement plus another housing option could provide a surplus of housing within the 15 year time constraint. This would mean that excess housing from Surrey Heath and Rushmoor could be transferred to Hart.

Can you say whether or not you see this extra housing coming from 'across Hart's borders' as a likely outcome, and if it is likely what sort or numbers do you envisage Hart having to accept from nearby authorities?



## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

The risk is that by failing to put in place a Local Plan will result in developers continuing to determine where growth takes place within Hart and not the local community – this was the recent message from Bandon Lewis. It is currently resulting in ad hoc planning without any link to the co-ordinated provision of infrastructure. It means that the Council cannot protect what is important to it or deliver improvements to local communities.

It is paramount that the Local Plan is prepared based on a strategy that seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities (an overriding NPPF obligation). Whilst the extent of any shortfall is still to be quantified and will not be known until our neighbours are further advanced in their own planning, both Rushmoor and Surrey Heath have identified a shortfall in meeting housing needs (1,700 and 1,400 homes respectively). This goes to the heart of the Plan and the Duty to Cooperate. It lay behind the reason why Hart's previous Plan was rejected. Developers are already questioning Hart's 5-year land supply position on the grounds that it fails to accommodate the overall shortfall across the housing market area.

Taking SHLAA capacity into account Hart could accommodate a significant amount of the housing market area shortfall. The Government's Senior Inspector has recently advised that the shortfall cannot simply be ignored. To pass the test of soundness at an examination an Inspector would be expecting to see how the Council has complied with the Duty to Cooperate and in particular, what flexibility is built into the Local Plan to accommodate the unmet housing market area need. The Council therefore must first meet its own immediate needs (4,000 homes), but it must also be prepared to plan for what could amount to a further 3,000 dwellings (i.e. 7,000 dwellings in total). Not testing the Winchfield option will not change that position.

Any new settlement will have to be planned so that the SHMA needs are addressed. This means that the housing mix and tenures must track the requirements generated by the housing needs, including demographic changes such as an ageing population.

#### Compulsory Purchase

##### **Mr Andrew Renshaw (Question 1)**

First is the question I asked at Cabinet that did not receive the courtesy of a reply: Daryl Phillips explained to attendees at the briefing for parishes on the housing strategy consultation on August 6 that if Hart had to go down the road of compulsory purchase, this would cause problems with the Inspector, so can he explain that again, and tell us the delays that would be encountered?

We have no plans for compulsory purchase.

#### Testing

##### **Andrew Renshaw (Question 2, and 4)**

Can we be given an estimate of the cost of 'testing' a new settlement at Winchfield and the timescale; and have the risks of this course of action been assessed?

At this stage it is not possible to give a precise estimate of the cost of "testing" the new settlement option. It is likely to be handled outside the Council for which a specification and a

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

form of tendering exercise will first be required. This is a conventional approach and attracts no greater risk than the assessment of other options.

Will Cllr Parker now admit that the information about Winchfield Station that he gave in an interview to BBC Radio Surrey on the morning after the Cabinet meeting was incorrect? It has short platforms: that is, it is not full size, as he stated. Can he further explain how the car parking can be easily extended, as he suggested. Since parking is now at capacity, will he assist in finding a solution in the near future in order to overcome the current problems encountered by rail passengers?

#### **Charles Jamieson**

As you will be fully aware, the pressure on Winchfield station in recent years is such that parking facilities after commuter times are virtually non-existent and the influx of say 3000 new users of trains particularly at peak commuter times would overload the system. This overpressure on services, including roads, trains, health and education would be disastrous and detrimentally affect Winchfield and all the surrounding villages. What plans do Hart Council and the proposed developers have to satisfactorily address these issues?

#### **Barrie England (Question 2 and 3)**

(2) What consultations have been held with South West Trains and Network Rail about the ability of the rail services to cope with the increased passenger numbers which a new settlement at Winchfield would generate?

(3) What consultations have been held with the Highways Agency about the likely impact of such a settlement on increased traffic joining the M3 at junctions 4a and 5?

We can debate what constitutes a full length platform but we can agree that the one at Winchfield is sufficient for 8 car trains. However this is not an impediment to development and neither is car-parking capacity. The key issue is to look forward to what benefits and infrastructure new development would bring. The Council will work with Network Rail and the train operating companies. Given sufficient critical mass there would be no reason why sufficient funds could not be generated through the development to extend the current platforms and, as recently shown at both Fleet and Farnborough, it is clearly possible to integrate increased parking into any new development.

Rail capacity overall is a recognised issue but that would be an issue wherever development takes place in Hart. It is also not an issue that is unique to Hart and is certainly not a reason to reject the testing of a new settlement at Winchfield. Network Rail has published and maintains Route Utilisation Strategies (RUSs), which establish the most efficient ways to use and, where appropriate, increase network capacity to deal with forecast changes in demand. The London and South East RUS 2011 represents the latest such thinking for routes into and around the capital, together with other parts of South East England. A number of options are under consideration to increase capacity and reduce overcrowding on the Basingstoke/Guildford to London termini. These will be developed through further RUS's.

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

Hart will be happy to work with Cllr. Renshaw to improve station parking at Winchfield. The Council will continue working with all infrastructure providers, such as Network Rail, the Highways Agency, Hampshire County Council, Thames Water, NHS (England) etc. as well as other infrastructure providers and relevant agencies as part of the testing process. A full transport assessment will be carried out to establish the impacts on the transport network and what improvements could be made to the network to mitigate those impact at all relevant stages in the preparation of the Local Plan.

#### **Consumer Protection Regulations**

##### **Andrew Renshaw (Question 5)**

Under Consumer Protection Regulations (CPRs) anyone selling a house, whether as an individual or through an estate agent, within a certain radius of the planned 5,000 houses, taking in Odiham, east Hook, Hartley Wintney and west Fleet, will have to disclose the Barratt scheme in the sales particulars. Every estate agent will have to inform any potential purchaser of any property about the scheme, even before they view, in case the material fact about the new town would influence their decision to view. Contravention will lead to action by Trading Standards.

What effect will the Barratt scheme have on house prices?

The Consumer Protection Regulations have no relevance as to the testing of possible growth options. It would also be quite wrong to speculate about house prices and indeed, it is not the purpose of the planning system to protect the interests of one person against the interests of another. In any event, to seek to imply that the testing of a new settlement option at Winchfield gives rise to an issue associated with the Consumer Protection Regulations (CPR) is misplaced. Firstly, for the purpose of the planning assessment it is an irrelevant consideration. Secondly, it is a private matter for the vendors and purchasers of property and finally, it would be quite wrong for anyone unfamiliar with the details of the property market to either speculate or to make assumptions on possible implications on private interests.

#### **Barratt's Vision document**

##### **Andrew Renshaw (Question 6)**

Why, out of 685 responses received to the consultation, was just one, by Barratt Homes, distributed by Hart to all councillors?

Barratt Home's Vision document was published on the web at the same time as all the other representations. It was afforded no special place or privileges. The Chairman of Winchfield Parish Council requested and saw an early copy. Barratt's had however supplied a number of copies that they asked to be made available to Councillors. No other site promoter sought to do the same.

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

##### The Role of Councillors

##### **Rambir Heyre**

With regard to planning decisions, can you tell me how local democracy operates and how the wishes of the community are taken into consideration? What is the evidence that Councillors represent the views of their electorate?

Under constitutional law, councillors represent the interests of their electors according to their judgment, and are in turn judged on their actions at the next election. They are not delegates.

Councillors have a number of roles. Overall, they have a duty to act in the interests of the Council as a whole and all the communities served by it. In terms of planning decisions, as decision makers Councillors are charged with making decisions on individual applications. These decisions are made according to the planning scheme and other relevant local policies. Councillors' individual opinions about a proposed development are only relevant in that they may impact on their interpretation of the legislation. Councillors must base their decisions on the legislative framework.

Members of the community may lobby councillors about individual planning applications. These community members often expect their elected representative to act according to their wishes at all stages of the application process.

Councillors may be in a position to ensure that the decision makers are aware of their constituents' views. However, their statutory obligations as members of the Council sometimes mean that they cannot act on these views.

##### "Saved" Local Plan policies

##### **Christine Strudwick**

Will the Council please explain why the saved policies from Hart District Local Plan are not being adhered to?

When the original Hart District Local Plan was rejected in August 2013 the council saved many policies, we must assume this was because the studies which had produced the work proved the importance of taking these forward to influence future development. Many of the Rural and Conservation policies apply specifically to the need to carefully control development in areas of *Particular Landscape Character*, Winchfield is specified as such.

The countryside is described as *being an asset which the plan intends to conserve and protect for its own sake, where any development in the open countryside should not have a significant detrimental effect on the character and setting of the countryside by virtue of its siting, size and prominence in the landscape, that it should be in keeping with their surrounding buildings and countryside and not adversely affect the amenities of existing residents or activities*

The importance of paths and conservation areas, the benefit – to the entire district – of rural amenities is laid out in great detail, the need to protect rural settings and views and keep villages defined in their own landscape; *Development which would lead to the coalescence or damage the separate identity of neighbouring settlements will not be permitted.*

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

Winchfield is an important 'local gap' and should be listed as such. The proposed development will join Winchfield to the boundaries of Hartley Wintney. The 'green lung' created by the farms, fields, copses and small enclaves of houses which comprise Winchfield, so valued and well-used as a local amenity, will be destroyed. Winchfield will no longer have a 'separate identity', it will no longer exist, it will be yet another rural community annihilated by development.

This is a new Local Plan. The "old" Local Plan dates from 2001 and having regard to Government advice it is now out of date. In particular it is silent of how the District should meet future housing needs. This new Local Plan will replace the "old" Plan. One key issue it must address is one of the key Government objectives which is to boost significantly the supply of housing. The Government suggests that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. In view of the level of growth required in Hart, the Council is seeking to test that potential opportunity.

#### **Environmental Impact**

##### **Ian Coster (Question One)**

I. Anyone who has walked Winchfield's footpaths and canal path know that much of the diverse fauna and flora in its woodlands, fields and wet areas would be likely to be severely adversely affected by a new settlement of the size proposed. Vast areas of habitat would simply disappear.

If this proposal is to be 'tested', can you detail the sort of environmental impact surveys would be undertaken to log the species in the area and assess the impact a large settlement would be likely to have on them? What agencies would undertake this sort of work?

At this stage a strategic approach is required and the testing will take the form of a sustainability appraisal. A sustainability appraisal is a systematic process that must be carried out during the preparation of a Local Plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are the most appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. Sustainability appraisal should be applied as an iterative process informing the development of the Local Plan.

Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a Local Plan during its preparation. More generally, section 39 of the Act requires that the authority preparing a Local Plan must do so "with the objective of contributing to the achievement of sustainable development".

Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations'), which implement the requirements of the European Directive 2001/42/EC (the 'Strategic Environmental Assessment Directive') on the assessment of the effects of certain plans and programmes on the environment. Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues.

In assessing sustainability appraisals the Council works with national bodies, such as Natural England.

#### Letter to RT Hon Brandon Lewis

##### **Sue Beagley**

Question 1 -

With reference to a letter from Councillor Stephen Parker to The RT Hon Brandon Lewis MP dated 3<sup>rd</sup> November 2014 thanking him for arranging a planning inspector advisory visit on 20<sup>th</sup> Oct. The letter was available on the Council website but subsequently removed. Would the Councillor please explain the reference to "skip consultations and thus shortening the program by some months"

The letter to Brandon Lewis remains on our web site and can be found on its original page <http://www.hart.gov.uk/Emerging-planning-policy-guidance>. The Senior Planning Inspector advised the Council that there is no legal requirement to consult on a draft Local Plan prior to publication of a pre-submission draft Plan.

#### Landscape Character Assessment 1997

##### **Sue Beagley (Question 3)**

When was the last Landscape Character Assessment of Winchfield made? This is referred to in 'documents to aid SA Assessment'. You refer to a document link on Hart website Scott Wilson 1997 but the link does not work. However if written in 1997 the document is nearly 20 years old and could be out of date especially with regard to a development of this scale

Landscape character does not readily change and essentially is static over time. Hart has not significantly changed over the past few years. The 1997 Character assessment is essentially just as valid today as it was 20 years ago.

#### Process

##### **David Turver**

f) **Background:** Most of the consultation feedback from developers was against Option 4. The only developer in favour was Barratts and they produced an expensive glossy brochure as part of their submission. **Question:** Please set out all of the contact between the council (meaning council officers and councillors) and Barratts in the period from one month before the SHMA was commissioned and 31 October 2014, and all of the contact between the council (meaning council officers and councillors) and all other significant developers for the same period.

We have no record of any formal meetings with developers during this period. In any event the SHMA was conducted by contractors who were requested to perform their work on housing

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

needs independent of land supply. Officers will have had contact with SHLAA site owners etc. in order to clarify issues on those sites. It is also possible that planning officers may have encountered employees of development companies in the course of their usual professional activities.

#### **Andrew Renshaw (Question 8)**

What are the chances of Hart district maintaining its place next month in the Halifax ratings as the best place to live in Britain?

Chances are good, but the more interesting question in the light of the current issues is what are the chances in several years time. To that I would answer excellent, as we have a district council and community intent on ensuring that any development wherever it is located will play its part in keeping Hart a superb place to live.

#### **Barrie England (Question 4)**

Which councillors, if any, live in Winchfield?

I am not aware of any currently living in Winchfield. The members representing the ward are Councillors Crampton, Kinnell and Southern.

#### **Damian Moran**

At the meeting on 6<sup>th</sup> Nov, Councillor Parker stated that the assessment of use of land at Lodge Farm, North Warnborough had not been completed because “we have not had time”; this was after Councillor Parker had to ask the meeting what the acronym SHLAA stood for. Have the council now had time to complete the assessment to consider the option of using land at Lodge Farm and if not already done what is the timescale for doing so? The council website shows Lodge Farm under SHLAA 100, which if numbered in sequence would indicate that this SHLAA was initially logged some years ago, is this the same SHLAA that Councillor Parker has stated they have not had time to review yet?

The Lodge Farm submission was received on 10<sup>th</sup> October 2014 – the final day of the consultation exercise. The reference numbers are not a guide to the sequence in which sites were submitted. It was one of many new sites submitted, all of which are being written up into a new SHLAA for publication in December 2014.

Over the winter and spring alternative strategies and sites, include the Lodge Farm site, will be appraised in terms of their sustainability against numerous criteria. That exercise is part of the testing exercise and will inform the Council’s final decision on its strategy.

#### **Mike Garwood**

Could the Council please confirm whether the company they have advising them on the new plan are also advising any of the major developers involved and inform us to the size of payment that would be made by the developers to the Council if a new settlement was agreed.

The company advising Hart on the new plan (Adams Hendry Consulting) are not advising any of the major developers involved. The Council will not receive any payments from the developer by agreeing to test the option of a new settlement.

## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

##### **Kirsty Cary**

One of the 'Risks' to Option 4 (new settlement) detailed in the Housing Development Options Consultation, Paper C, Appendix I (July 2014) was:

*Proposing a large long-term strategic development may encourage one or more neighbouring local authorities to seek help in meeting their own housing requirements under the 'duty to co-operate'*

It is well known that the densely populated Districts of Surrey Heath and Rushmoor cannot cope with their housing demands. If Hart went ahead with a large new settlement, these two Districts would without doubt 'seek help from Hart' and unload large numbers of their housing onto our district. Hart would be in no position to refuse these extra houses.

- 1 What is the quantity of housing numbers you envisage would be likely to come from our two neighbouring Districts if a large settlement were to be built in Hart?

Any requirement to take overflow housing from neighbours is unrelated to the size of a potential settlement in Winchfield. Hart has more than enough identified SHLAA sites than are required to accommodate Hart's objectively assessed needs therefore, if Hart's neighbours cannot meet their respective needs, it is expected that Hart should seek to accommodate it.

Hart's position however, is that both Rushmoor and Surrey Heath must make every effort to meet their identified needs, regardless of whether the Council goes for a new settlement or not. Hart will thoroughly test any claims made by those authorities that they cannot meet their own needs. Any discussion of numbers at this stage is premature since work is ongoing to ensure that those areas meet their needs as far as possible.

- 2 Is the CIL money Hart would receive for each extra house that came to Hart via this route enough to compensate for the permanent and cumulative effects this would have on Hart's housing numbers?

The Council does not yet have CIL in place. It is seeking to develop a CIL charge that is as high as possible within the rules of CIL charging, to maximise infrastructure benefits. There will still be a role for Section 106 on larger developments where infrastructure is needed on site. The testing process will explore what infrastructure is needed and how it can be funded.

The most eco-friendly way of building new houses is to build on brownfield sites.

The public perception is that Hart does very little to ensure as many brownfield sites as possible are developed into housing. As an example, there are large numbers of empty office blocks in Fleet and Hook that could be pulled down or converted into housing apartments. Can you please tell me:

- 3 What is the number of brownfield sites in Hart under consideration for development for housing at the present time?



## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

4 Where are these sites and how many houses they are likely to account for?

The Council will endeavour to maximise the contribution from brownfield land. Unfortunately there are not enough such sites and it is not always the case that the owners of empty offices, for example, wish to sell their sites, or convert them to housing.

The SHLAA includes all the available brownfield sites, which can be viewed at:  
<http://www.hart.gov.uk/Evidence-base>

Information on potential supply from brownfield sites was included in the Housing Options Paper (pages 39-41), which estimated that 580-875 homes could be delivered on previously developed sites. This will be updated and refined in light of new information as the plan is prepared.

#### **Tristram Cary**

An unbiased Local Development Plan needs be developed as a result of a proper evaluation of all available development options.

I Can the Council confirm that they have contacted all owners of land (including the MoD) on the edges of the larger settlements of Fleet, Yateley, Blackwater and Hook, and that these landowners have been given a proper opportunity to promote their land for housing development. Have all the resulting potential sites been objectively assessed in terms of their impact on infrastructure, services, facilities and the natural environmental in order to arrive at a prioritised list of available options?

The consultation exercise between August and November included a call for sites for the SHLAA. This resulted in a large number of new sites coming forward. SHLAAs are used across the country for identifying available land. Site promoters are well aware of this process, and are very active in promoting sites that might have a chance of being allocated for development in the plan. The SHLAA has been going for several years and sites are being promoted around all the main settlements and many villages, and in other areas. The Council does liaise with the MOD and is kept aware of any land that is made available for sale or development. Indeed, the Council was actively engaged with the MoD in the sale of Minley Manor and is currently engaged with the Home Office on the sale of Bramshill House.

**HART DISTRICT COUNCIL**  
**COUNCIL MEETING - 27 NOVEMBER 2014**  
**QUESTIONS FROM THE PUBLIC**

**Cambridge Centre  
for Housing &  
Planning Research**

26<sup>th</sup> November 2014

**Independent validation of the objectively assessed housing need identified in the Draft Hart, Rushmoor and Surrey Heath Strategic Housing Market Assessment (May 2014, Wessex Economics)**

Hart, Rushmoor and Surrey Heath Councils jointly commissioned Wessex Economics Ltd (WE) to carry out a Strategic Housing Market Assessment (SHMA). The draft SHMA states that the objectively assessed housing need (OAHN) for the three local authority areas (i.e. the Housing Market Area: HMA) is 1,180 homes p.a., which equates to 23,600 homes over the period 2011-31. In 2031, the housing stock required in the HMA is projected to be 128,738 homes.

Hart Council is fundamentally content with the projection procedure and the results. Nevertheless, Hart Council commissioned Cambridge Centre for Housing and Planning Research (CCHPR) to independently examine whether the OAHN for the HMA over the period to 2031 was a reasonably valid result.

The methodology of the OAHN projection is outlined in the appendices of the SHMA draft. Some of the datasets used in the projection process are in the public domain (notably DCLG Household Projections by local authority area), while the detailed econometric model for the projection is not revealed – which is understandable in that such models are often private intellectual property.

**Review of the OAHN formation**

Wessex Economics measured OAHN as an annual increase in the number of homes ( $H$ ) needed in the HMA area, that is,  $H_t - H_{t-1}$ . The subscript  $t$  indicates the observation period i.e. 2012 to 2031.  $H$  was created through the following three processes:

- Household projections based on demographic information
- Household projections adjusted to meet job increases
- Added markup

CCHPR examined WE's projection method at each process and the corresponding datasets used. On balance, WE's methodology appeared fairly reasonable and in line with the National Planning Practice Guidance.<sup>1</sup>

**Validation**

Taking into account the review and the fact that Sub-National Population Projections (SNPP), one of the vital ingredients for the OAHN formation, were recently updated, CCHPR validated the OAHN by re-projecting housing needs in

<sup>1</sup> DCLG (2014) *Planning Practice Guidance - Housing and Economic Development Needs Assessments*. On-line: [planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/](http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/). Accessed in July 2014.

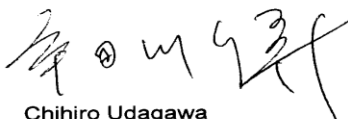
## HART DISTRICT COUNCIL

### COUNCIL MEETING - 27 NOVEMBER 2014

#### QUESTIONS FROM THE PUBLIC

Following the three processes of the OAHN and drawing on the updated datasets, notably 2012-based SNPP, the re-projection of housing needs in the HMA ranges from 1,125 to 1,150 homes p.a. which means in 2031 the housing stock required in the HMA will range from 128,440 to 128,949 homes.

The OAHN in the HMA (128,738 homes) clearly falls in the re-projection range, maintaining that overall the OAHN over the next two decades is valid.



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26.11.2014

