



14/00867/MAJOR Hop Garden Road Appeal Submission

Opposition to the development at Hop Garden Road by the We ♥ Hart Campaign



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1 SUMMARY

This purpose of this submission by the We ♥ Hart Campaign is to oppose the specific unnecessary development proposed at Hop Garden Road in Hook and demonstrate to other developers who may wish to put forward speculative proposals for the over-development of the district that they will face formidable opposition to their plans. Hart District is facing a scale of development that is against the wishes of its residents and in contradiction to stated Government policy to place planning decisions in the hands of local people.

Let me remind you 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."

We ♥ Hart object to this proposed development and any future speculative proposals on the grounds summarised below:

- The SHMA and OAN are not objective and represent a "need" that is far too high.
- Understated brownfield capacity means green field development is not necessary
- This proposed development will not contribute towards meeting the needs of the changing demographics of the district
- The proposed development will make the current infrastructure funding gap worse
- Lack of consideration of the environment

As shown in section 8, the combined effects of reducing the OAN as assessed in the SHMA to a more realistic level and taking account of brownfield development in the pipeline that is not included in the Land Supply calculation would increase the land supply to 11.7 years.



The only reasonable conclusion from this analysis is that the Hop Garden Road application should be refused as it is not required; would build the wrong type of housing in the wrong place to meet the changing demographics of the district; would make the already difficult infrastructure funding position worse and needlessly concrete over our valuable green fields and damage the environment.

We ♥ Hart respectfully requests that this application is turned down.



2 INTRODUCTION

I am David Turver, a resident of Hartley Wintney in Hart District. I have become increasingly concerned about the process of creating the Local Plan and the unrealistic demands being placed on the District to build more and more houses that are not needed that will destroy this corner of our green and pleasant land.

I have set up the We ♥ Hart Campaign (aka We Heart Hart) with the following objectives:

- To call for the overall housing allocation to be reduced by challenging the SHMA
- To demand that the Council develops a vision and strategy for Hart that retains its role as a rural, green hinterland for NE Hampshire that respects the separate character and identity of Hart's settlements and landscapes and preserves the green spaces as amenity space for the urban settlements.
- To require that the housing need is met by building on brownfield sites and increasing density in our existing urban areas to help rejuvenate our existing shopping centres.
- To request that future housing stock reflects the needs of the changing demographics of the district.
- To petition the council and government against any new settlement in Hart that will act as a sink for the unmet housing need in neighbouring areas.
- To hold Hart Council to account to ensure the process is legal and transparent and properly consults all of the residents of Hart.

I believe it is time to take a stand to bring local planning back into the hands of local people, bring a "common-sense on" approach and oppose those with vested interests that seek to destroy our environment and the very things that make Hart such a great place to live.

In support of this point of view I have set up the the We ♥ Hart petition¹ that over 1,900 people have signed which demonstrates the strength of opposition to the level of development proposed by the Local Plan.

¹ <https://you.38degrees.org.uk/petitions/we-hart>



3 SHMA AND OAN REPRESENT A “NEED” THAT IS TOO HIGH

There are a number of points that need to be made here. The first is the definition of need. According to the Oxford Dictionary a need is “something that is required because it is essential or very important rather than just desirable”. This section will argue that the OAN is based on the “wants” of developers, not on the “needs” of the local people.

3.1 PROCESS FOR CREATING THE SHMA WAS NOT OBJECTIVE AND DID NOT CONSULT RESIDENTS

Appendix A of the SHMA outlines the process for stakeholder engagement. It reveals that the only people consulted were from local authorities or from developers and housing associations or their representatives. If the main people consulted are the developers, it cannot be a surprise that their input errs towards the need to build more. Furthermore, this demonstrates that local people have not been consulted on what they perceive to be the needs of the district which is contrary to NPPG para 7²:

Local communities, partner organisations, Local Enterprise Partnerships, businesses and business representative organisations, universities and higher education establishments, house builders (including those specialising in older people’s housing), parish and town councils, designated neighbourhood forums preparing neighbourhood plans and housing associations should be involved from the earliest stages of plan preparation, which includes the preparation of the evidence base in relation to development needs.

The SHMA and associated OAN should thus be viewed as biased towards the point of view expressed by developers and is thus a “high” estimate of future need that should be moderated by the views of the groups outlined above. Over 1,900 people have signed the We ♥ Hart petition which has as its first objective “to reduce the overall housing allocation for Hart District”, which is evidence to show that if local people were consulted they would seek to make the assessment of need more objective by challenging the bias of the developers. The likely impact of this will be to increase the number of years of housing land supply calculated by Hart DC.

² <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/the-approach-to-assessing-need/>



3.2 DCLG STARTING POINT TOO HIGH

The evidence supplied by Hart DC³ at para 5.15 shows that “between 1996 and 2013, 5,133 homes were built, which is 403 more than those required”. The DCLG figures are merely forward projections of what has happened historically in the district. Therefore, by definition, these figures project forwards a rate of development that is greater than the “need” of the district and are thus a flawed starting point.

In addition, according to table 5.11 (reproduced as Figure 1 of this report) of the SHMA, over the period 2001-2011 Hart delivered housing at a far higher rate than the average for the South East and for England as a whole. It is surely incorrect to argue that because Hart has delivered above regional and national averages in the past it must continue to do so for the next 20 years. Government policy is to encourage a “Northern Powerhouse” so focusing too much development in the South East will divert funds and other resources away from this objective.

Figure 5.11: Increase in Different Dwelling Types over Last 10 Years (2001-2011)

	Detached	Semi detached	Terraced	Flats - purpose built	Flats - conversions	Other
Hart	7%	10%	8%	34%	-4%	9%
Rushmoor	-10%	0%	-1%	43%	-8%	-5%
Surrey Heath	2%	3%	4%	39%	-5%	-10%
HMA	2%	4%	3%	40%	-6%	-3%
South East	4%	6%	6%	35%	6%	5%
England	7%	5%	3%	29%	3%	7%

Source: Census 2011

Figure 1: Table 5.11 from the SHMA

Moreover, a starting point that merely assumes that past rates of development are projected forwards cannot by definition be “sustainable” since the logical conclusion of such an approach will lead to the whole district being concreted over to the detriment of residents and the environment.

Finally, the SHMA states that the ONS usually understates forward requirements and goes on to make a number of arbitrary upward adjustments to the figures. However, the Government website⁴ states that “The current methodology in England reflects work to improve the household projections outputs and methods to better meet user needs”. It is therefore unreasonable to adjust the starting point upwards when the DCLG themselves have worked to fix past errors as these adjustments will further compound the already unsustainable assumptions.

³ http://publicaccess.hart.gov.uk/online-applications/files/803A9695D5077F4A03BD3AF059E6FAC0/pdf/14_00867_MAJOR-COUNCIL_S_PROOFS_-_PROOF_OF_EVIDENCE_-_PLANNING_POLICY_MANAGER-1000071.pdf

⁴ <https://www.gov.uk/household-projections-notes-and-definitions-for-data-analysts>



3.3 INWARD MIGRATION ASSUMPTIONS UNREALISTICALLY HIGH AND DO NOT REPRESENT NEED

Inward migration to this or any other district represents a “want” of people living elsewhere to live in Hart and not a “need”. Many people may desire to live in Hart because it is one of the best places to live in the country, but no-one “needs” to move to live here in the strict sense of the word. Indeed inward migration to Hart represents the unmet needs of other districts. If Government policy is followed, then the housing, employment, education and other “needs” of the people “wanting” to move to Hart should be met by the local authorities where they currently live and thus the apparent need for housing in Hart arising from inward migration should substantially reduce. There is no evidence presented in the SHMA to evaluate the impact of reduced inward migration to Hart from other districts as a result of those districts now being forced to meet their own needs, nor the impact of the implementation of the Northern Powerhouse.

Notwithstanding the above, the SHMA makes a subjective judgement to cherry pick inward migration data from 2005-2010 as being the “most realistic” approach to take to future demographic modelling. Moreover, it uses spurious statistical analysis to try to infer causation from a weak correlation ($R^2 \sim 0.65$) between housing completions and inward migration. This is inherently flawed for a number of reasons outlined below.

First, of course it is self-evident that the period during which the HMA delivered most housing was when inward migration was highest. However, as was argued above, this scale of inward migration represents unmet needs of other districts rather than the unmet needs of Hart.

Second, the period when we were building most and attracting most inward migration was during one of the longest uninterrupted periods of economic growth in history, supported by a large structural deficit in the national accounts and the biggest credit binge of all time. Of course it ended in a spectacular bust and can in no way be described as a “normal” or “sustainable” set of economic conditions. The economic conditions we are seeing now with more moderate growth linked to the need for the Government, companies and people to live within their means and reduce debt will be the situation for the foreseeable future and thus represent a more “normal” situation.

The period 2007-2012 includes the final year of the boom, the recession and the now more moderate pace of economic growth that surely more closely represents future conditions. Indeed, as Figure 2 shows, taking the period 2007-2012, the HMA delivered 2,942 new dwellings which at an average of 2.5 people per dwelling created capacity for an extra 7,355 people to live in the area. Despite that, the HMA experienced an overall outward migration of 1,824 people. It surely cannot be considered sound to base the future housing “need” on increasing inward migration projections when recent data shows that in fact the HMA is undergoing net outward migration despite creating significant capacity for more people to live here.

Accordingly, the additional 1,210 houses postulated in the SHMA arising from inward migration should be removed from the housing “need”. The impact of this will be to increase the number of years of

housing land supply (see Section 8) calculated by Hart DC and remove the need for a development such as that proposed at Hop Garden Road.

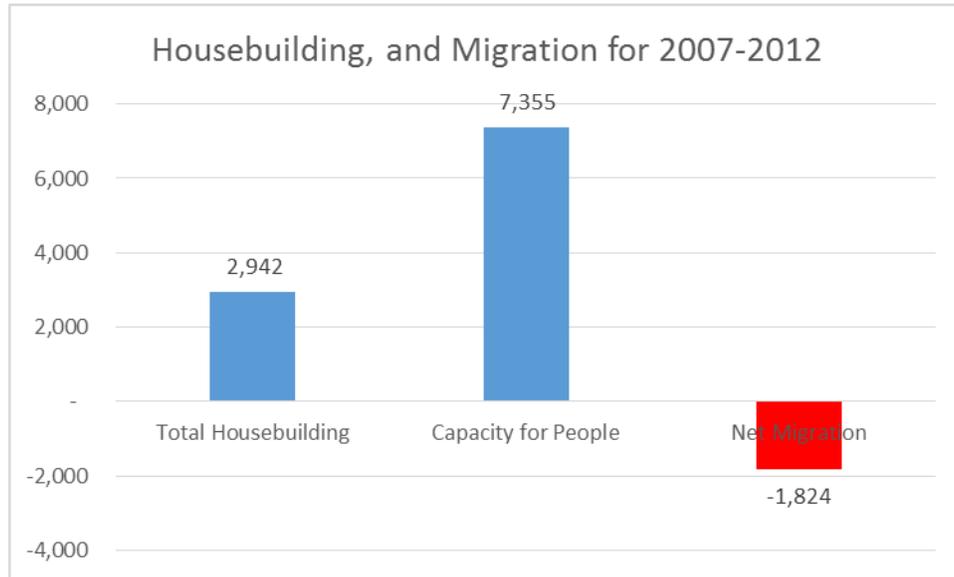


Figure 2: Housebuilding versus migration data taken from Figure 7.5 of the SHMA, with people capacity calculated as 2.5 people per dwelling

3.4 AVERAGE HOUSEHOLD SIZE ASSUMPTIONS INAPPROPRIATE

Figure 7.7 of the SHMA (reproduced as Figure 3 in this report) shows that the trend in household size as measured by the census is slightly upward for the period from 2001 to 2011. This is in direct contradiction to both the 2008-based and 2011-based CLG projections. Yet the forward projections used in the SHMA reverse the trend shown in actual data in the census and persist with the inaccurate forecasts of a continuing fall in the average household size.

Part of the justification for this is given as “at the time of the 2011 Census, the British economy was still in recession”. This is factually incorrect as a cursory examination of the GDP numbers on the BBC website⁵ shows that the economy came out of recession in mid-2009. It seems the forecasting “experts” are at a loss to properly explain this reversal of trend.

Moreover, given that the starting point for the SHMA projections is DCLG sourced figures, it would be somewhat odd for the DCLG forward projections not to include its own forecasts for household size.

⁵ <http://www.bbc.co.uk/news/10613201>

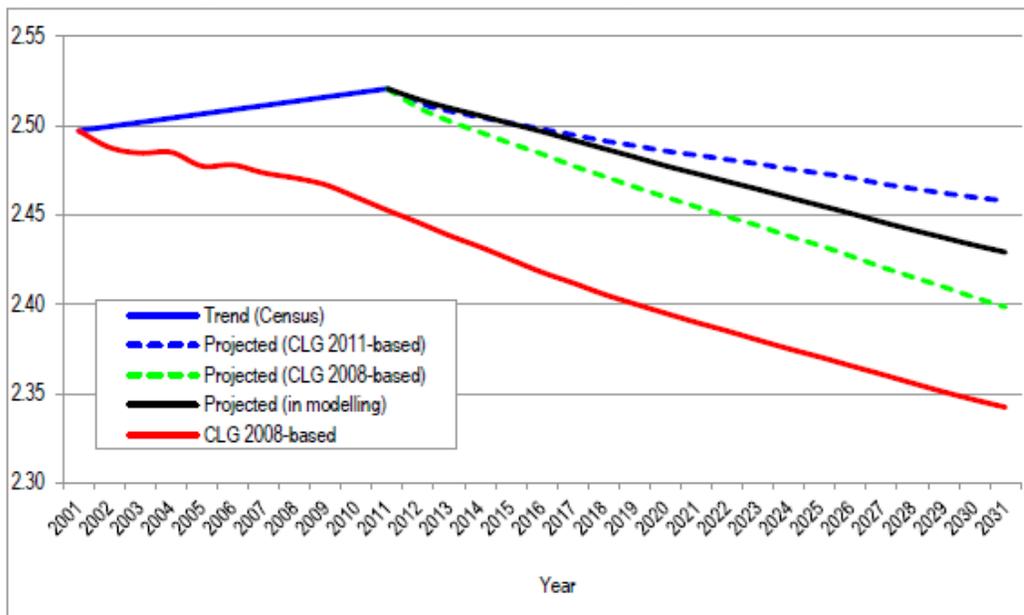


There is therefore a significant risk, that this part of the SHMA has double counted erroneous household size projections.

It is therefore inappropriate continue to assume a continuing downward trend in household size. Surely a more prudent assumption would be to assume that the current household size is maintained and update that assumption and the SHMA as more real data comes to light.

Accordingly, the 1,500 additional houses in the SHMA related to the flawed household size assumption should be removed. The impact of this will be to increase the number of years of housing land supply (see Section 8) calculated by Hart DC and remove the need for a development such as that proposed at Hop Garden Road.

Figure 7.7: Average Household Size with Different Projections



Source: Wessex Economics Analysis of ONS and CLG

Figure 3 Reproduction of Figure 7.7 of the SHMA

3.5 JOBS GROWTH ASSUMPTIONS UNREALISTIC

The SHMA uses a set of jobs growth assumptions that are based on forecasts that are vastly in excess of what has been achieved in the most recent economic cycle.

The SHMA contains data on the historic rates of job growth for the HMA. This shows two sets of data that are derived from different sources and cover different time periods (Figures 4.3 & 4.4 of the SHMA).

First, there is the period 1998-2008, covered by ABI data. This shows overall job growth in the period of 7,200, or 720 per annum for the 10 year period with a compound annual growth rate (CAGR) of 0.6%.



Second there are different BRES sourced data for the periods of 2009-2012. The BRES data from 2009-2012 shows total jobs growth of 200, or 67 per annum for the 3 years in question or a CAGR of 0.05%.

Figure 4 shows a comparison of the BRES data and the ABI data that demonstrates the discontinuity between 2008 and 2009, with a jobs increase of nearly 10,000 when we know the economy was in the teeth of a deep recession. Note that the report states that the ABI and BRES data cannot be directly compared because they are compiled using different methods. It is therefore clear that each period (and dataset) should be treated separately and independently rather than splicing them together.

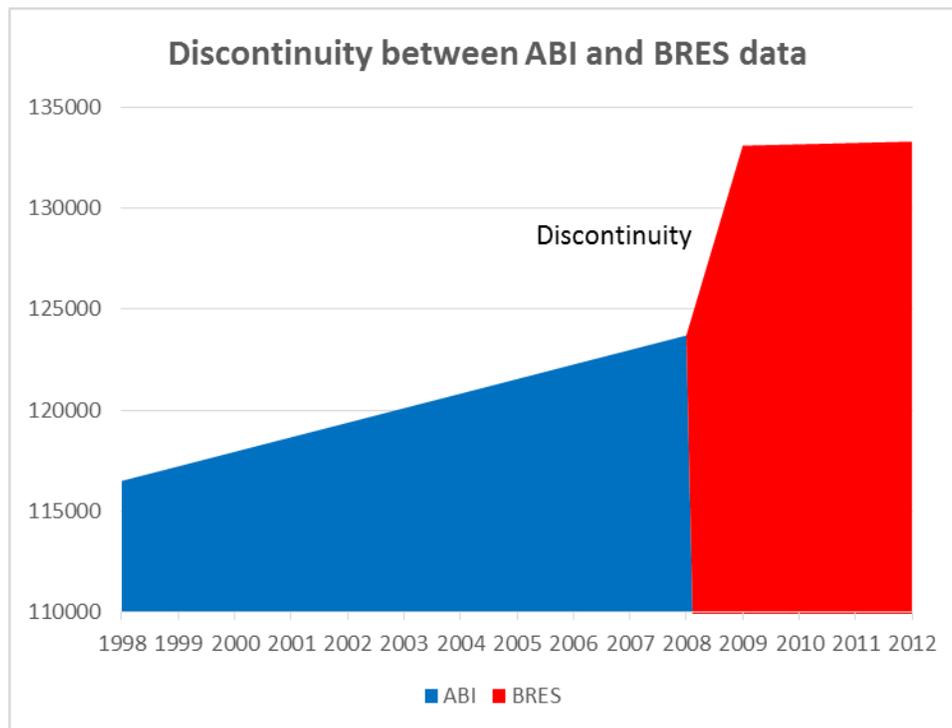


Figure 4: Discontinuity between ABI and BRES data

Treating the datasets separately would indicate total jobs growth over the economic cycle of 7,400, or 529 per annum or a CAGR of 0.41%, based on backward extrapolation of the BRES data.

Taking this 0.41% rate of growth as a future projection would mean we would add 11,332 overall jobs over the period of 2012-2032 at an average rate of 567 total jobs per annum.

However, the SHMA uses as its central assumption that future jobs growth of 1,130 per annum will be achieved, equating to a CAGR of ~0.79%, nearly double what was achieved over the most recent economic cycle and far higher than that achieved during the unsustainable boom of 1998-2008. Given the constraints on Government spending and tighter credit conditions that are likely to persist for some time due to tighter bank regulation, it is inconceivable that we will achieve an economic growth rate



nearly twice that achieved during the last economic cycle. Figure 5 shows the comparison of these growth rates.

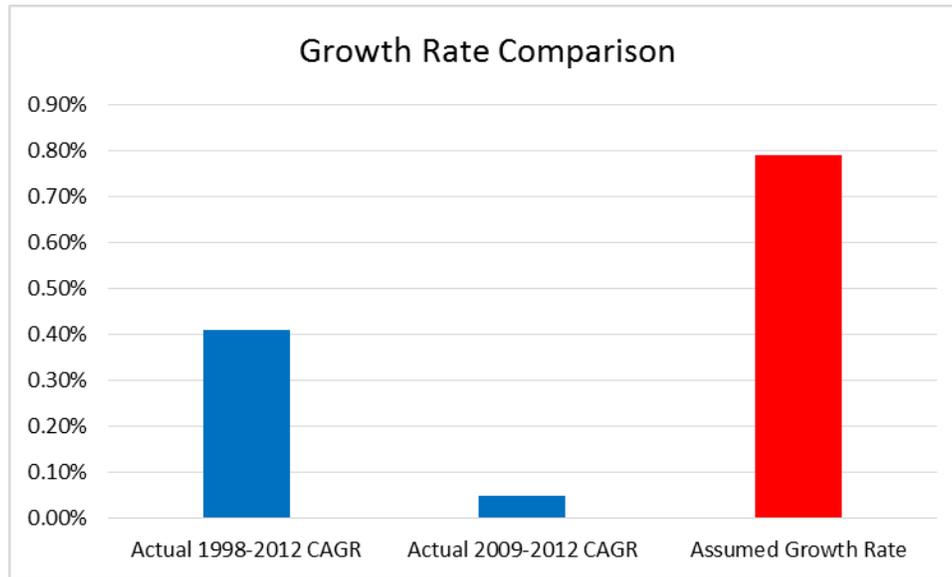


Figure 5: Comparison of Actual and Projected Growth Rates

Little justification for this is given other than it is based on Experian forecasts. The recent job creation history (2009-2012) showed jobs growth of 67 per annum as we came out of the recession. 67 jobs per annum equates to less than 6% of the jobs that the SHMA assumes we will create. This demonstrates that the Experian forecasts are pie in the sky and it beggars belief that such unproven Experian forecasts should take precedence over the actual real world achievement.

Figure 4.1 of the SHMA (reproduced as Figure 6 of this report) demonstrates that Hart in particular and the whole HMA enjoy high levels of employment and unemployment levels that are below the regional and national averages.

Figure 4.1: Economic Activity and Employment in 2013

	Hart	Rushmoor	Surrey Heath	HMA	South East	England
Population aged 16-64	57,000	62,900	52,400	172,300	5,434,300	33,789,200
of which, economically active	83%	76%	84%	80%	80%	78%
in employment	80%	71%	77%	75%	64%	71%
unemployed	4%	6%	9%	5%	6%	8%

Figure 6: Reproduction of part of Figure 4.1 from the SHMA

Therefore, the number of jobs to be created in the future should at least partially be a matter of “want” rather than “need”. The future employment targets should be based on a realistic assessment of the

capacity of the economy to create jobs in the private sector as it is these jobs that will support the largely state sector jobs in education and health that will be required to support the increased population.

As noted above para 7 of the NPPG states that local communities should be involved *“from the earliest stages of plan preparation, which includes the preparation of the evidence base in relation to development needs”*. Moreover, a recent legal opinion⁶ from Peter Village QC has said:

“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.”

It therefore follows that the local community should be consulted upon the employment targets it wishes to set and the related scale of development required to meet that target. No such consultation has taken place, nor is it planned which represents a significant flaw in the Local Plan process. The evidence from the petition indicates that local people are more likely to express a preference for a lower level of development.

Finally, despite enjoying high levels of employment, it is clear that we need to change the way we forecast jobs growth in the area as past methods have resulted in vast amounts of unused employment land and vacant retail outlets with examples illustrated in Figures 7 and 8.

Empty Shops

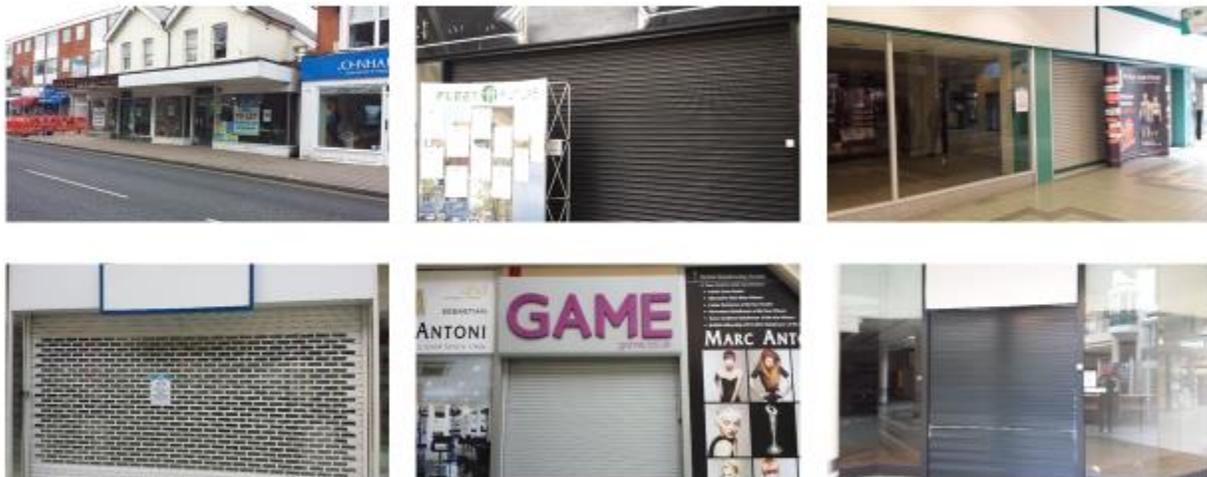


Figure 7: Vacant retail premises

⁶ http://wehearhart.co.uk/sdm_downloads/peter-village-qc-legal-opinion/



It is clear that past employment forecasts have been erroneous; that the future employment forecasts in the SHMA are spurious and do not represent a realistic assessment of future economic or employment growth rates; and the local communities have not been consulted upon this key issue. Nevertheless, the HMA can achieve enviable growth and employment rates in line with the requirement to “plan positively” without having to resort to such over-development.

Accordingly, the 5,100 additional houses in the SHMA related to the flawed employment forecasts should be removed. The impact of this will be to increase the number of years of housing land supply (see section 8) calculated by Hart DC and allow more brownfield sites currently assigned for employment use to be re-allocated for housing development. Overall this will remove the need for a development such as that proposed at Hop Garden Road.

4 UNDERSTATED BROWNFIELD CAPACITY MEANS GREEN FIELD DEVELOPMENT NOT NECESSARY

The amount of housing that can be developed on the land supply in the SHLAA (and 5 year housing supply calculation) significantly under-states what can be achieved. This is illustrated in the sections below.

4.1 BROWNFIELD SITES NOT IN THE SHLAA

There are a large number of brownfield sites that could be available for housing development (see Figure 7) that do not even appear in the SHLAA. These include vacant offices Ancell's Farm in Fleet and Bartley Wood in Hook.

Vacant employment land



Figure 8: Examples of vacant and derelict brownfield sites

A number of these sites are being evaluated by the owners for conversion into housing. Whilst it would be better if these areas were comprehensively re-planned and properly re-developed for housing, nevertheless these sites represent a supply of housing that is not in the SHLAA and not in Hart DC's 5-year land supply figures because they do not require planning permission to proceed. The impact of this is that Hart's 5-year land supply considerably under-states what might reasonably be expected to be delivered.



This is further illustrated by recent planning decisions, recent applications and by a recent report⁷ compiled by Stonegate Homes Limited on the potential capacity for converting offices to residential under permitted development rights.

This potential additional capacity is illustrated in the table below:

Location	Number of Dwellings
Guillemont Park Phase 1 ⁸	48
Guillemont Park Phase 2 ⁹	320
Ancell's Farm, Fleet (per Stonegate Homes)	370
Bartley Wood, Hook (per Stonegate Homes)	200
Fleet Road, Fleet (per Stonegate Homes)	220
Total	1,158

Under current regulations, the office conversions need to be completed by end of May 2016. The figures above also include some allowance for additional blocks on some of the sites that are not subject to these restrictions. It appears likely that all of these dwellings will be completed within the planning timescale of early 2020.

The impact of this is that the land supply position is under-stated as discussed further in section 8.

4.2 ERRORS IN THE SHLAA

There are a large number of errors in the database of land that Hart used to estimate brownfield capacity. Examples of these are:

- No systematic way of identifying brownfield sites: there is no tag on any of the data to separate brownfield sites from other sites.
- Significant inconsistencies in their data such as sites being in their analysis spreadsheet that are not on the SHLAA map (e.g. Sites SHL319 and 321).
- Sites recorded on the SHLAA map (e.g. SHL100) in one place (Sun Park) and recorded in their analysis as completely different places (Hartfordbridge).

⁷ <http://wehearhart.co.uk/wp-content/uploads/2015/05/Viability-of-converting-offices-on-brownfield-sites-to-residential-in-Fleet-and-Hook.pdf>

⁸ Note shown as 102 units in 5 year land supply, but permission granted for 150 units in 13/02633/MAJOR (<http://publicaccess.hart.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=MXN1AAHZ0F100>) so balance of 48 units included here

⁹ Pre-application made for 320 units (<http://www.gethampshire.co.uk/news/local-news/controversial-plans-revealed-guillemont-park-9260323>)



- Significant discrepancies between the detailed sheets and the summary of those detailed sheets. For instance, Part 1 shows a total housing availability of between 612 and 701 houses, but on the summary sheet this shows as between 463 and 648. Similar discrepancies exist throughout the spreadsheet

Moreover, some sites (e.g. the former Bramshill Police College) did not factor in the council's analysis and it could have a capacity for around 350 dwellings. Taken together, these represent a very significant under-statement of brownfield capacity at least some of which might be expected to deliver in the next five years.

4.3 VACANT LAND GOING UNDEVELOPED

There are some sites such as Hartland Park (119 acres or 48 hectares) that have been given permission for other uses, but the developer is not proceeding with development. It should surely be possible for these sites to be re-designated for housing and maybe even a school thus relieving pressure on green field development. A site such as this could deliver close to 5,000 dwellings at 100dph.

4.4 INAPPROPRIATE DENSITY ASSUMPTIONS

The density assumption used by Hart DC is around 30 dwellings per hectare (dph). However, in answers¹⁰ to questions put to Hart DC by We Heart Hart they have conceded that densities up to 80-160dph could be achievable in urban areas. Changing this assumption alone and using the mid-point of the 80-160dph estimate would increase Hart Council's (under)stated brownfield capacity of around 700 by a factor of four to 2,800.

Taken together, the lack of focus on the potential of brownfield sites significantly understates the potential available capacity for meeting the housing need of the district and wider HMA in the next five years and the wider planning period. A stronger focus on brownfield would mean that green field developments in general and the specific proposed development at Hop Garden Road are simply unnecessary. Therefore the proposed development should be refused on the grounds that it is unnecessary.

¹⁰ <http://wehearhart.co.uk/2015/02/hart-district-council-has-no-brownfield-strategy/>



5 WRONG TYPE OF DEVELOPMENT IN WRONG PLACE FOR CHANGING DEMOGRAPHICS

Para 50 of the NPPF states:

“local planning authorities should...plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)”

Figure 10.15 of the SHMA (reproduced as Figure 9 of this report) sets out the number of specialist housing units that will be required to meet the needs of the ageing population.

Figure 10.15: Estimated Requirement for Specialist Housing (2012-30)

	Hart	Rushmoor	Surrey Heath	HMA
Sheltered – affordable	570	340	480	1,380
Sheltered – market	570	160	530	1,270
Extra care – affordable	250	210	270	730
Extra care – market	0	0	20	20
Total	1,390	710	1,310	3,400
Per annum	80	40	70	190
Registered care (total)	940	600	420	1,960

Source: Housing LIN

Figure 9: Reproduction of Figure 10.15 of the SHMA

This shows that that between 2012 and 2030, Hart District Council needs to provide 1,390 specialist units for the elderly and infirm. Extending this back to 2011, and out to 2032 at the 80 dwellings per annum rate identified in the report would give 1,630 units. To this must be added the further 940 registered care places in the graphic above. This gives a total of 2,590 additional units for the ageing population.

In addition, the SHMA says:

“There is the potential opportunity therefore to reduce under-occupation and free up family sized dwellings for overcrowded households; although to achieve this it would very likely be necessary to provide attractive options in areas where households currently live and where they have social and community ties”

This clearly states that we should build the required specialist accommodation where people currently have ties and can be close to amenities, which is in line with the land buying policies of specialist



companies like McCarthy & Stone and Churchill. This seems to rule out building specialist accommodation for the elderly in a new estate type developments that are more than a few hundred metres from existing facilities.

3,500 units of the assessed overall “need” of 7,534 dwellings have already been granted planning permission. Relatively few of these are specialist units for the elderly – I know of a Churchill and a McCarthy and Stone development in Fleet which will total around 120 units. There must be some more, so being generous let us assume that is a total of around 390 units. This leaves around 2,200 units to find for the elderly and infirm.

As can be seen, more than half of the residual 4,000 units left to be granted permission need to be specialist units for the elderly and they need to be in the right place to meet the needs of these people.

The proposed development at Hop Garden Road is for the wrong type of housing in the wrong place to meet these needs and should be refused on these grounds alone unless and until a proper plan for meeting the needs of the elderly, preferably on brownfield sites in urban areas close to amenities is put in place.

6 THE PROPOSED DEVELOPMENT WILL MAKE THE CURRENT INFRASTRUCTURE FUNDING DEFICIT WORSE

The most recent Infrastructure Delivery Schedule¹¹ published by Hart Council shows a funding gap of ~£78m, reproduced in Figure 10.

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 ¹⁴⁷	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

Figure 10: Reproduction of Table A3 from Hart DC IDS

Crucially, this does not include any infrastructure for the proposed significant increase in the housing for the district: no new schools, no improvements to the railway and no costs attributed to healthcare improvements like doctor’s surgeries or expansion of hospitals. This demonstrates that there is little prospect of delivering the required infrastructure within the plan period.

Our infrastructure is already creaking, for example:

- Currently, the expected waiting time for an appointment at the Hook and Hartley Wintney doctors is two weeks compared to recent waiting times of ~48 hours. This demonstrates that the recent additional development in the area has put such a strain on GP capacity that it has reached breaking point.
- The mainline railway to London is running over-capacity with peak time trains to London Waterloo being standing room only beyond Farnborough and even off-peak trains are standing room only beyond Weybridge.

¹¹ <http://wehearhart.co.uk/wp-content/uploads/2015/02/Hart-DC-Infrastructure-Delivery-Schedule-October-2014-Part-A-v2.pdf>



- Our roads are crowded with frequent traffic jams in the district at peak times.
- There is increasing pressure on school places and real concerns that schools are becoming too big to maintain their excellent reputation.

The proposed development at Hop Garden Road will contribute little towards closing this funding gap, but the increased population will add further incremental demand on our increasingly over-loaded infrastructure. This will have a significantly deleterious impact on the health, well-being and quality of life of the existing residents of Hart and surrounding areas.

Moreover, there are a number of paragraphs of the NPPF that call for a focus on infrastructure alongside housing:

7. There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:
 - **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

Figure 11: NPPF Para 7



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

Figure 12: NPPF Para 17

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.

Figure 13: NPPF Para 177



181. Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.

Figure 14: NPPF Para 181

It would be economic madness and in direct contravention of the NPPF (in particular para 177) to grant planning permission to this development, or indeed any other large scale development unless and until a proper infrastructure plan including funding is put in place. The proposed development at Hop Garden Road should be refused on these grounds alone.



7 LACK OF CONSIDERATION OF THE ENVIRONMENT

7.1 GOVERNMENT SAYS WE SHOULD VALUE THE COUNTRYSIDE

In a letter¹² to Simon Ridley of the Planning Inspectorate, planning Minister Brandon Lewis has drawn attention to the intrinsic character and beauty of the countryside. A quote from the letter is shown below:

“Landscape character and prematurity in planning decisions

I have become aware of several recent appeal cases in which harm to landscape character has been an important consideration in the appeal being dismissed.

These cases are a reminder of one of the twelve core principles at paragraph 17 of the National Planning Policy Framework – that plans and decisions should take into account the different roles and character of different areas, and recognise the intrinsic character and beauty of the countryside – to ensure that development is suitable for the local context.”

This proposed development will undoubtedly damage the local landscape character and thus be at odds with the Minister’s wishes that we must respect the intrinsic character and beauty of the countryside.

7.2 VALUE OF GREEN SPACES

There is a growing body of evidence that our green spaces have intrinsic value and that policy makers should pause for thought before giving the go ahead to concrete over our greenspaces. A recent paper¹³ by Professor Dieter Helm states:

“Before policy makers surrender to the direct interests of the developers, they should pause for thought. There is a viable third alternative that at least deserves proper analysis, and it is potentially rich in benefits. Instead of yet more urban sprawl, imagine a Green belt with lots of natural capital, a much more environmentally benign agriculture, much greater public access, woodlands located next to people so it could fulfil not only the original purpose of limiting the sprawl but also provide the lungs of the cities, the fresh air for children to play in, and the recreational benefits which are crucial to health and well-being. That is worth exploring before the irreversible destruction of this major asset located exactly where it is needed – next to people. There is after all no shortage of land to build houses on if that is what is required. It does not have to be at the expense of a key asset that the previous generation left to us, and which we have a responsibility to pass onto the next generation.”

¹²

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418657/150327_Brandon_Lewis_MP_to_Simon_Ridley.pdf

¹³ <http://www.dieterhelm.co.uk/sites/default/files/Green%20Belt%20Paper%20.pdf>



In addition, Dr Simon Mortimer of Reading University is conducting a survey¹⁴ of the Loddon catchment area (which includes much of Hart District) that is demonstrating the intrinsic value of our greenspaces on our health and well-being from views of greenspace, places for physical activity in the outdoors, opportunities for interaction with nature and the positive effects greenspaces give from providing places for angling, walking, canoeing, picnicking, cycling, dog walking and running.

We have demonstrated above that there is plenty of brownfield land available. We believe that this brownfield land should be exhausted first before considering incremental urban sprawl and concreting over our remaining valuable green spaces.

7.3 LACK OF CONSIDERATION OF A “POLICY ON” REQUIREMENT

The evidence put forward by the developer makes the claim that the OAN described in the SHMA is a “policy on” requirement. It is accepted that the SHMA makes an erroneous claim at para 7.97 that annual employment growth scenario adopted is a “policy on” scenario.

However, a recent legal opinion¹⁵ from top planning QC, Peter Village contradicts this view by stating:

“...there is no evidence to date that the Council has considered the “reasonable alternative” of not providing the full OAN within its area, and setting a lower “policy on” requirement, because the environmental cost is simply too high. When this reasonable alternative has been properly considered and tested by the Council, it too should form the basis of the further regulation 18 consultation.”

It is clear that a “policy on” alternative has not been considered; that the claim of the developer is tendentious and that the process for the Local Plan needs to be amended to include consideration of a “reasonable alternative” of not providing the full OAN by properly evaluating the environmental cost of the proposed scale of development. This “reasonable alternative” should then be the subject of further consultation.

Given the environmental constraints in the district represented by the TVB SPA, the numerous SSSI’s and SINCs, it is inconceivable that such an exercise would yield a housing target that is greater than that presented in the SHMA. Furthermore, given the strength of opposition to the current Local Plan process represented by the We ♥ Hart petition it is extremely unlikely that any consultation about the “policy on” housing target would result in the local community expressing a preference for the higher level of development presented in the current SHMA.

In the light of all of the above environmental evidence, the proposed development at Hop Garden Road should be refused because it is likely that it will cause needless environmental damage and be in any case unnecessary on any reasonable assessment of the likely future housing target.

¹⁴ http://wehearhart.co.uk/wp-content/uploads/2015/05/EcosystemServicesLoddon_CulturalServices_3March2015.pdf

¹⁵ http://wehearhart.co.uk/sdm_downloads/peter-village-qc-legal-opinion/

8 CONCLUSIONS

The impact that the over-stated demand and understated supply has on the 5 year land supply calculation is shown in Figure 15 below.

Calculation Parameters		Hart DC 31/1/15	With Increased Supply (per Section 4.1)	With Reduced Demand (per Section 3)	With Increased Supply and Reduced Demand
Housing requirement 1st February 2015 to 31st January 2020					
a	Total SHMA requirement from 1st February 2015 to 31st January 2020	1,795	1,795	1,468	1,468
b	SHMA requirement 1st February 2015 to 31st January 2020 with buffer	1,885	1,885	1,541	1,541
Shortfall in housing provision between 1st April 2011 and 31st January 2015					
c	Dwellings required between 1st April 2011 and 31st January 2015 (46 months)	1,376	1,376	1,127	1,127
d	Net new dwellings completed between 1st April 2011 and 31st January 2015	936	936	936	936
e	Shortfall during period 1st April 2011 and 31st January 2015	440	440	191	191
f	Total housing requirement for period from 1st February 2015 to 31st January 2020 (b+e)	2,325	2,325	1,732	1,732
g	Annual requirement over the period 1st February 2015 to 31st January 2020 (f/5)	465	465	346	346
Housing supply 1st February 2015 to 31st January 2020					
Net outstanding planning permissions at 1st February 2015 expected to be built by 31st January 2020 (see Appendix 4)					
h	January 2020 (see Appendix 4)	2,303	2,303	2,303	2,303
i	Deliverable sites without planning permission at 1st February 2015	500	500	500	500
j	Windfall allowance (21 dwellings * 4 years)	84	84	84	84
j1	Increased brownfield supply per Section 4.1	-	1,158	-	1,158
k	Expected supply for the period 1st February 2015 to 31st January 2020 (h+i+j+j1)	2,887	4,045	2,887	4,045
l	Surplus over the period 1st February 2015 to 31st January 2015 (k-f) 562	562	1,720	1,155	2,313
m	Supply in years (k/g)	6.2	8.7	8.3	11.7

Figure 15: Impact of Increased Supply and Reduced Demand on the Land Supply Calculation

The first data column re-produces the 5-year land supply per Hart District Council document as of 31 January 2015.

The Increased supply column assumes that the additional 1,158 dwellings from brownfield sites discussed in section 4.1 are delivered between now and 31 January 2020, assuming demand remains as per the SHMA. The impact of this is that the land supply position would increase to 8.7 years.

The reduced demand column assumes that all of the arguments presented in section 3 are upheld and the demand in the SHMA is reduced to the PROJ 1 figures presented in the SHMA appendices. This reduces the annual housing requirement to 294 dwellings per annum, or 1,468 dwellings over the period 2015 to 2020. The number of dwellings required for the period 1 April 2011 to 31 January 2015 also reduces pro rata to 1,127. The impact of this is that the land supply position would increase to 8.3 years.

The combined increased supply and reduced demand column combines both the changes above and results in a land supply position of 11.7 years.



There are two further impacts of the reduced demand scenario that have not been quantified:

- 1) The unmet demand of Rushmoor and Surrey Heath would fall away, leaving those districts with excess capacity. This opens up the possibility of Hart being able to persuade Rushmoor and Surrey Heath to take some of Hart's demand to preserve the environment in Hart.
- 2) The level of employment land required across the HMA will reduce, thus opening up the possibility of providing even more brownfield land for development.

Taken together it is difficult to see how the development at Hop Garden Road can be justified given that:

- 1) Hart has a comfortable land supply position of somewhere between 6.2 and 11.7 years.
- 2) There are plenty of brownfield sites available that are ripe for development in preference to green field development

The only reasonable conclusion from this analysis is that the Hop Garden Road application should be refused as it is not required; would build the wrong type of housing in the wrong place to meet the changing demographics of the district; would make the already difficult infrastructure funding position worse and needlessly concrete over our valuable green fields and damage the environment.

We ♥ Hart respectfully requests that this application is turned down.