

# WINCHFIELD PARISH COUNCIL

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Chairman	• Andrew Renshaw	• Talbothays Farm, Station Road, Winchfield, Hook, Hampshire RG27 8BZ • e-mail: <a href="mailto:renshaw.aj@gmail.com">renshaw.aj@gmail.com</a>	• Tel: 01252 843566
Vice-Chairman	• Meyrick Williams	• Pepper Box, Sprats Hatch Lane, Winchfield, Hook, Hampshire RG27 8DD • e-mail: <a href="mailto:meyrick.williams@btconnect.com">meyrick.williams@btconnect.com</a>	• Tel: 07980 660001
Clerk	• Alison Ball	• 54 Lapin Lane, Basingstoke, Hampshire RG22 4XH • e-mail: <a href="mailto:winchfieldparishclerk@outlook.com">winchfieldparishclerk@outlook.com</a>	• Tel: 01256 810649

8 August 2019

The Rt Hon Robert Jenrick MP  
Secretary of State for Housing, Communities &  
Local Government  
Ministry of Housing Communities & Local  
Government  
4<sup>th</sup> Floor, Fry Building  
2 Marsham Street  
London SW1P 4DF

Dear Secretary of State,

## **Shapley Heath Garden Village**

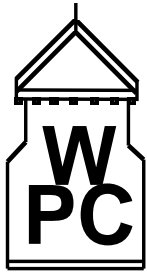
I write to you on behalf of Winchfield Parish Council (WPC) in response to your department's announcement on 27 June 2019 that Hart District Council's (HDC) proposed Garden Village has been selected to join the Garden Communities Programme.

This announcement has generated significant concern across the whole of Hart but also confusion and scepticism in the planning system given the conflicting position reached with the Hart Local Plan. We therefore write to seek clarity and request that your department will reconsider its decision to give financial support to the advancement of Shapley Heath Garden Village (SHGV) by HDC.

This letter has the support of Hartley Wintney, Dogmersfield, Crondall, Greywell and Long Sutton & Well Parish Councils. The Parish Councils of Eversley, Odiham and South Warnborough have made known to WPC their concerns about the proposed development and will consider adding their full support to the letter when they next meet.

In summary, the principal concerns expressed in this letter are as follows:

1. The Inspector's findings following the independent examination of the Local Plan rejected the SHGV proposal, which followed HDC's Garden Village Application in November 2018.
2. HDC's ongoing promotion of SHGV is not supported by the Inspector's findings on the submitted Local Plan and he is quite clear that other options need to be considered in an impartial manner.



# WINCHFIELD PARISH COUNCIL

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3. The absence of sound justification for bringing forward SHGV (as it is not needed to meet identified housing needs) and the lack of evidence to demonstrate that the proposal is deliverable and sustainable was confirmed by the Inspector's findings on the submitted Plan.
4. The numerous shortcomings with HDC's bid when considered against the Garden Communities prospectus lead us to question how it has been successful.
5. HDC pre-determined the plan-making process, and failed to provide the evidence to the Inspector to demonstrate that it had impartially assessed reasonable alternatives. If HDC proceed with a Local Plan review as indicated based on SHGV as its chosen long term growth strategy, it will irresponsibly overlook the Inspector's criticisms of the current Plan's failure to impartially assess reasonable alternatives, and continue to ignore local opinion. HDC's bid to be included in the Gardens Community Programme is a further demonstration of their continuation of pre-determine the planning process.
6. HDC's ongoing promotion of SHGV is not supported by the local communities directly impacted by this large scale proposal.

These matters are expanded upon below.

## **Background**

As set out in its bid, HDC's ambition is to deliver, with support from its chosen developer partners, Lightwood Land and Gallagher Estates/Barratt Homes, a garden village of approximately 5,000 to 10,000 homes within a boundary identified in its 'Submission Local Plan: Strategy and Sites' as a New Settlement Area of Search (AoS). As illustrated by the plan enclosed with this letter, the AoS covers the majority of the Parish of Winchfield, with a smaller area extending into the Parish of Hook to the north west of the railway line.

WPC has taken a substantial interest in the emerging Hart Local Plan and has, with the support of its planning advisors, fully engaged with and made comprehensive representations in response to every consultation that has taken place during its preparation, dating back over 4 years. Its representatives also attended all 18 hearing sessions that have been conducted by the appointed Planning Inspector, Mr Jonathan Manning, following the submission of the Local Plan for Examination in June 2018, and took a full and active part in 15 of these sessions.

Of particular concern to WPC (and others) throughout the plan-making process has been:

- The absence of sound justification for bringing forward a new settlement within the AoS; it is not needed to meet identified housing needs; and
- The lack of evidence to demonstrate that a new settlement is deliverable within the defined AoS.

WPC has repeatedly expressed these concerns, and is in no doubt that they have been overlooked by HDC as its members made a highly controversial and political decision to plan for a new settlement from the outset. This is substantiated by a detailed analysis into the



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evolution of the Local Plan which was presented in WPC's Regulation 19 representations<sup>1</sup>. Our analysis concludes that HDC pre-determined the plan-making process, and has persisted with the idea of a new settlement in complete disregard to changes in circumstance and alternative options that have come forward whilst the plan has been in preparation. This is a position which was reaffirmed by Inspector Manning, as discussed further in the following section.

By way of further context, WPC feels it is important to highlight that it has embraced your Government's Localism agenda, and the community has come together to prepare the Winchfield Neighbourhood Development Plan (W NDP). This was 'made' in 2017 following an independent examination and represents the most comprehensive and informed assessment of the Parish to date. It achieved a 61% turnout at the referendum with an exceptionally high 96.4% 'yes' vote in support. The Plan's vision is **"to plan a future for Winchfield of sympathetic and sustainable development, achieving managed growth with incremental supporting infrastructure that maintains the essential characteristics of this Domesday listed village"**<sup>2</sup>.

WPC has demonstrated through its representations how a new settlement would inevitably conflict with W NDP policies, would erode the distinct settlement pattern of the Parish, and lead to irreversible change of significant scale and impact that would be completely at odds with the community's vision as established through its W NDP.

## Update on the Hart Local Plan Examination

As noted in HDC's bid, the delivery of SHGV was expected to be facilitated through the adoption of the Local Plan followed by the adoption of a New Settlement Development Plan Document (DPD). After the HDC bid for funding was submitted to MHCLG on 8 November 2018, Inspector Manning examined the submitted Local Plan in late November / early December. On 26<sup>th</sup> February 2019 Inspector Manning wrote to HDC to set out the main modifications that he considers necessary for the Plan to be made sound. **His key finding was that the New Settlement proposed in the Shapley Heath area was unsound and should be removed from the Local Plan, and this therefore fundamentally changed the circumstances on which the bid was made.**

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<sup>1</sup> These can be found via the following link (see pages 178 to 190 of the PDF):  
[https://www.hart.gov.uk/sites/default/files/4\\_The\\_Council/Policies\\_and\\_published\\_documents/Plannin\\_g\\_policy/Local\\_Plan/248%20-%201-25%20-%20Winchfield%20Parish%20Council\\_Redacted.pdf](https://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Plannin_g_policy/Local_Plan/248%20-%201-25%20-%20Winchfield%20Parish%20Council_Redacted.pdf)

<sup>2</sup> The 'made' Winchfield NDP can be accessed via the following link:  
[https://www.hart.gov.uk/sites/default/files/4\\_The\\_Council/Policies\\_and\\_published\\_documents/Plannin\\_g\\_policy/Local\\_Plan/Neighbourhood\\_planning/Winchfield%20NP%20Adopted%20Version.pdf](https://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Plannin_g_policy/Local_Plan/Neighbourhood_planning/Winchfield%20NP%20Adopted%20Version.pdf)



# WINCHFIELD PARISH COUNCIL

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There are several further key points in the Inspector's letter<sup>3</sup> that we wish to draw to your attention:

- **Paragraph 10:** advises against an uplift in the housing requirement beyond 423 dwellings per annum (dpa), to deliver additional affordable housing, as this would result in **“open market dwellings being provided where there is no evidence of any need, which could lead to an imbalance between homes and jobs and unsustainable commuting patterns”**;
- **Paragraphs 11 to 15:** note that a housing requirement of 423 dpa would result in a shortfall in supply of 230 dwellings, which would occur in the very last year of the plan period (2031/32). This shortfall is not considered to be significant noting the low lapse rate in the district; very healthy level of permitted supply; and requirement for a review of the Plan in 5 years' time. The Inspector considered this a completely reasonable state of affairs;
- **Paragraph 18:** notes that the submitted Plan is seeking to establish the principle of a new settlement as the most appropriate growth strategy for meeting the Council's long-term needs, and it defines a relatively confined AoS for a new settlement. **Paragraphs 20 to 32** then go on to set out examples which illustrate that the evidence to support the new settlement (as presented in the sustainability appraisal) is not robust and **“it cannot be determined that it represents the most appropriate long-term growth strategy”**. We draw particular attention to **paragraph 26** which describes the confidence in the developers being able to avoid significant flood risk areas (amongst all the other constraints within the AoS) as **“a leap of faith, that is not supported by any robust evidence”**;
- **Paragraphs 33 and 34:** point out that **“there is little evidence to demonstrate that a new settlement can actually be delivered in terms of infrastructure, viability and landownership”**, noting the uncontested evidence that WPC presented at the hearing sessions that shows a significant parcel of land cutting across the middle of the AoS that is unavailable<sup>4</sup>;

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<sup>3</sup> This can be accessed via the following link:

[https://www.hart.gov.uk/sites/default/files/4\\_The\\_Council/Policies\\_and\\_published\\_documents/Planning\\_policy/EXAM%2060%20-%20Inspector%27s%20Post%20Hearing%20Letter%20to%20Hart%20District%20Council.pdf](https://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/EXAM%2060%20-%20Inspector%27s%20Post%20Hearing%20Letter%20to%20Hart%20District%20Council.pdf)

<sup>4</sup> This evidence can be accessed via the following link:

[https://www.hart.gov.uk/sites/default/files/4\\_The\\_Council/Policies\\_and\\_published\\_documents/Planning\\_policy/Local\\_Plan/Matter%204%20Written%20Statement%20%E2%80%93%20JB%20Planning%20for%20Winchfield%20Parish%20Council.pdf](https://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/Local_Plan/Matter%204%20Written%20Statement%20%E2%80%93%20JB%20Planning%20for%20Winchfield%20Parish%20Council.pdf)

The Landscape Briefing Note (pages 17 to 24 of the PDF), prepared by Michelle Bolger Expert Landscape Consultancy, includes a plan at Figure 05 which maps all of the constraints within the AoS and demonstrates the struggles that will be presented when it comes to attempting to masterplan a comprehensive, cohesive and inclusive new settlement. This includes in yellow shading the land that is not in the promoters' control.



# WINCHFIELD PARISH COUNCIL

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- **Paragraph 35:** advises that a significant level of further supporting work would be required for the New Settlement AoS to be found sound, **“which would need to include appropriate and proportionate area/site assessments, infrastructure considerations, viability testing, evidence in support of deliverability and further SA work, which would need to be done in an impartial manner with sufficient evidence to support its findings and comparisons with alternative options”**;
- **Paragraphs 36 to 39:** advise that the New Settlement AoS be removed from the Plan through Main Modifications. Also highlight that it is not possible for work undertaken as part of the preparation of the New Settlement DPD to address the shortcomings in the evidence base supporting the submitted Plan. As the submitted Plan is seeking to establish the principle of a new settlement as being the most appropriate strategy in the long term, over other growth options, then there needs to be sufficient evidence now to support this position and this is not the case.

Therefore to summarise, HDC's ongoing promotion of SHGV is not supported by the Inspector's findings on the submitted Local Plan and he is quite clear that other options need to be considered in an impartial manner. This echoes the concern expressed by WPC that HDC pre-determined the plan-making process, and persisted with the idea of a new settlement in complete disregard to changes in circumstance and alternative options.

## **HDC's response to the Inspector's Findings**

In response to the Inspector's letter, HDC responded on 15 March 2019 to confirm that the Council's Cabinet had formally resolved to accept his recommended modifications. HDC subsequently published its Proposed Main Modifications to the submitted Local Plan on 5 July 2019 for a 6 week public consultation. The Main Modifications follow the Inspector's advice that the New Settlement AoS (which was to be established by Policy SS3) should be deleted from the Plan.

WPC, together with the other councils which support this letter, are clearly very pleased to note that the Inspector's advice has been followed and we will be making representations to support the proposed modification.

HDC intends to be in a position to adopt the Local Plan by the end of the year, and we are pleased that the District will then be covered by an up-to-date plan for sustainable development.

## **Flaws in HDC's bid**

Given the position reached with the Local Plan, WPC is alarmed to note that HDC's contrary intention to proceed with its proposals to create a Garden Village in the same AoS.

WPC has carefully reviewed the bid documentation, which was only made public after your department notified HDC that its application had been successful. Having done so, and having regard to the assessment criteria in the Garden Communities Prospectus (August



# WINCHFIELD PARISH COUNCIL

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2018), there are several concerns that WPC wish to highlight, drawing your attention to areas of the bid that are fundamentally incompatible with the key aspects of the Garden Village assessment criteria:

- a) **Transformational development to an existing settlement** – HDC’s bid presents the proposal as a discrete new settlement. This is not the case, as it would inevitably result in physical coalescence of the existing settlement pattern within the Parish and very clearly links between the main towns of Hart resulting in an extended conurbation. The Prospectus makes clear at paragraph 7 that **“where the garden community is proposed to take the form of a transformational development of an existing settlement, it needs to meet the criteria set out in the prospectus. In addition, these proposals must highlight the transformational outcomes expected for settlement as a whole (economic, environmental and social).”** There is no mention in the bid of the outcomes that can be expected for the existing community and, for the reasons set out below, the bid fails to meet the criteria set out in the prospectus.
- b) **Housing need for the housing market area** – HDC’s bid accepts that the delivery of the new settlement is not required to meet the identified Local Plan housing target, but justifies the proposal on the basis that Hart is a highly desirable place to live and delivery of a new settlement from midway through the plan period (i.e. 2024) provides an opportunity to significantly boost housing supply. Noting the Inspector’s findings discussed above, particularly paragraph 10, there is significant concern that housing delivery beyond identified needs is being promoted at the expense of achieving sustainable development.
- c) **Development on predominantly brownfield sites** – this criterion will not be met, and the bid makes no attempt to address it. Of greater concern to WPC, is that a successful bid will shackle the hands of those that will be tasked to undertake the next Local Plan Review (within 5 years), and prevents them from identifying and testing alternative and more sustainable options, including urban regeneration and brownfield delivery.
- d) **Locally-led** – as noted above, representatives of WPC have taken a full and active part in the Local Plan preparation and examination and have kept the local community informed at all stages. WPC was very impressed with Inspector Manning’s handling of the Local Plan Examination, and its representatives were fully engaged and involved during the hearing sessions. The local community has, through the Examination, had a meaningful say in the growth strategy for the District, yet now there is significant confusion and suspicion that the plan-led system will be circumvented by this questionable bid. The broad support of our fellow Parishes clearly demonstrates that this bid is **not** locally led.
- e) **Ability to expand** – the bid is misleading in indicating that the proposed settlement is capable of expanding to the south when the land is not available for development (as noted by the Inspector). Ground water flooding, a historic landfill, gas main, overhead powerlines and the Odiham Common SSSI are further significant constraints which will compromise delivery over the identified southern expansion area. The ability to expand in other directions is restricted by the proximity of nearby settlements and further constraints as identified fully in WPC’s hearing statement (see footnote 4). We



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note that the bid's (page 7) indication of expansion of up to 10,000 homes prefaced by "not validated by the Council".

- f) **Deliverability** – HDC's bid assumed that the Local Plan, containing a new settlement AoS, would be found sound and adopted in 2019. Its delivery plan then proposed to bring forward the proposal through a New Settlement DPD. Both of these prerequisites are now not happening, bringing into question the validity of the original bid. WPC question how the bid can remain valid in light of the Inspector's findings on the Local Plan and removal of the underpinning policy. The deletion of the AoS from the higher level strategy means that there is no vehicle for a New Settlement DPD to come forward. Of further significance with respect to deliverability, is the Inspector's conclusion at paragraph 33, that despite four to five years of plan-making, there is little evidence to demonstrate that a new settlement can actually be delivered in terms of infrastructure, local employment, viability and landownership.

There are therefore, in our view, numerous shortcomings with HDC's bid misrepresenting the prospects of a new settlement being delivered and misleading your department into believing that a new settlement was a commitment that had local support.

## Conclusion

We note with interest your predecessor's letter to the Chief Executive of the Planning Inspectorate, dated 18 June 2019, in which he highlighted **"If local people and their representatives are to see the plan as an important platform for shaping their surroundings then they must have confidence that examination of the plan is fair and open and that decisions are made impartially."**

As explained in this letter, there is significant mistrust locally of HDC and its handling of the plan-making process. It predetermined the plan-making process and has been misleading the public over a number of years over the need and justification for a new settlement. The Inspector's thorough examination of the submitted Plan has correctly highlighted the faults in HDC's approach.

We are concerned that HDC, encouraged by your Department's support, will now proceed with a local plan review that (once again) predetermines SHGV as the most appropriate strategy in the long term, over other growth options. This was alluded to in a recent letter which Community Campaign Hart, the largest party of the controlling administration of HDC, wrote to Ranil Jayawardena MP advising him that, in the light of its successful bid submission, **"5000 homes have been secured for the next plan period through Shapley Heath"**.

If HDC proceed as indicated, it will irresponsibly overlook your appointed Inspector's independent assessment and fundamental lack of soundness of the current Plan's failure to impartially assess reasonable alternatives, and continue to ignore local opinion and localism principles.



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A further concern is that we could find ourselves in a similar situation in a few years' time where the shortcomings of the plan-making process are exposed during the Examination, although this time HDC will have reached that position having carelessly spent a significant amount of public money.

We therefore respectfully request that you intervene in your Department's decision to give financial support to HDC to bring forward SHGV.

Thank you in advance for giving this matter your attention. We appreciate that you will no doubt be very busy in your new post, and have been keen to keep this letter as brief as possible. To assist further in your understanding of this matter, we would be happy to, and would welcome the opportunity to, meet with you so that we may clarify or expand on our concerns.

We look forward to hearing from you.

Yours sincerely

Meyrick Williams

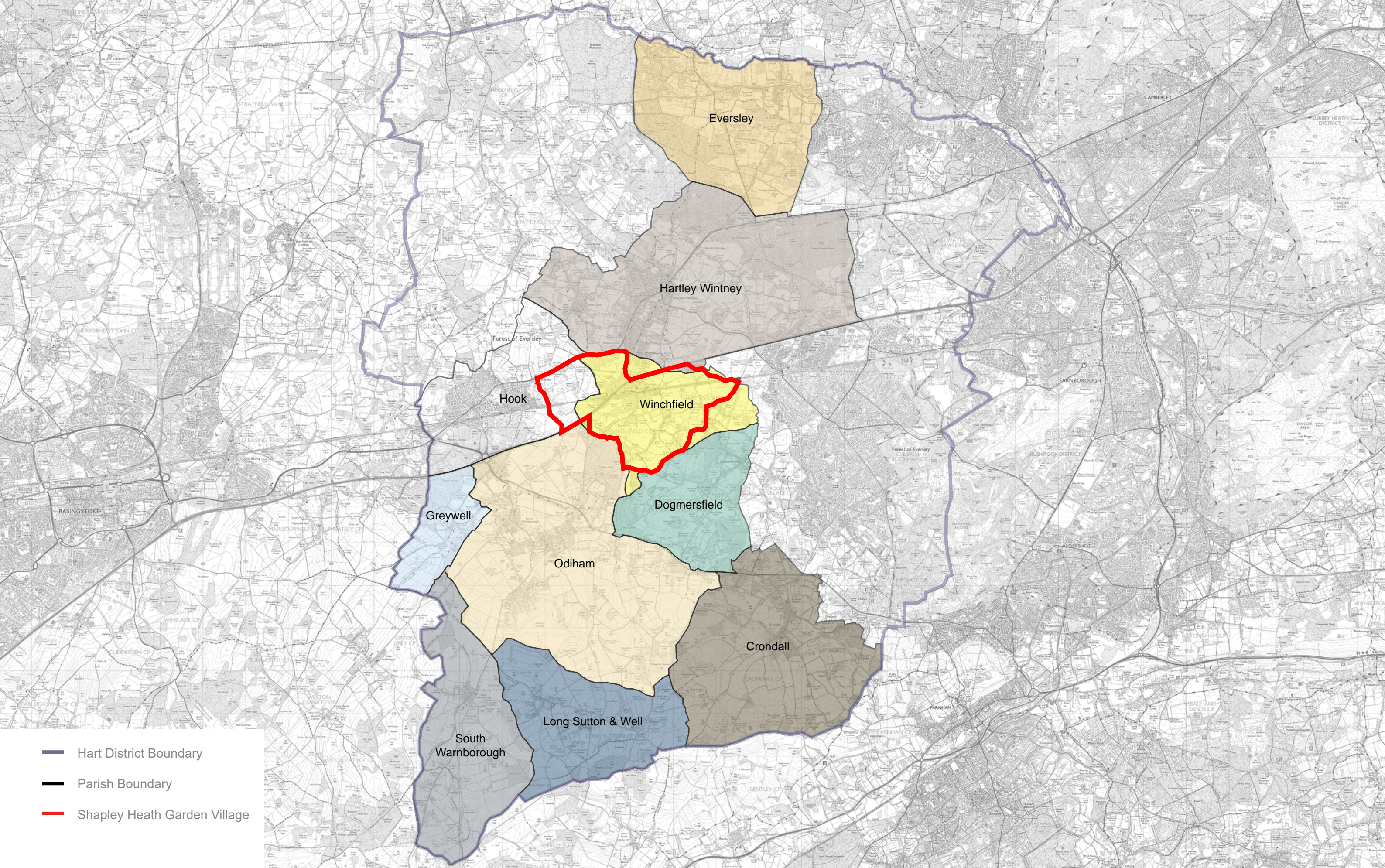
Vice-Chairman, Winchfield Parish Council

cc. Ranil Jayawardena MP

Cllr Dr A. Crampton

Enc. Hart Parish Plan with Shapley Heath Garden Village boundary





Winchfield Parish Council  
HART PARISH PLAN WITH SHAPLEY HEATH GARDEN VILLAGE BOUNDARY



metres

1399.05  
Version 03  
Scale: NTS

08/08/2019

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**jb** planning associates  
town planning  
and development  
consultants

Chells Manor, Chells Lane  
STEVENAGE, SG2 7AA

T 01438 312130

info@jbplanning.com  
www.jbplanning.com