

www.lsh.co.uk

Hart Shopping Centre, Fleet Road Fleet, Hampshire

Feasibility Report by Lambert Smith Hampton into redevelopment options for the Hart Shopping Centre

On behalf of **The Rural Hart Association**

Prepared by
Lambert Smith Hampton
United Kingdom House
180 Oxford Street
London W1D 1NN

Tel: 020 7198 2000 Fax: 020 7198 2001 Date: September 2018





CONTENTS

1.0	INTRODUCTION AND BACKGROUND TO THE REPORT	2
2.0	SITE CONTEXT	4
3.0	HART SHOPPING CENTRE, A FEASIBILITY STUDY FOR REGENERATION	9
4.0	ECONOMIC VIABILTY	. 13
5.0	CONCLUSION	.16
App	endix 1 - B3R Hart Centre Feasibility	
App	endix 2 - Development Appraisal	
Ann	endix 3 - Hart Centre Floorplan	

Appendix 4 - Regulation 19 Submission to the Hart Local Plan



1.0 INTRODUCTION AND BACKGROUND TO THE REPORT

- 1.1 The Rural Hart Association (RHA) is an organisation formed to protect the rural areas of Hart District from unnecessary development and in particular to resist the Development Plan allocation of a major new settlement in the rural areas of Hart District. Part of the strategy to protect these areas is to identify alternative opportunities where the need for more housing in Hart can be met on brownfield or urban sites in preference to rural or green field locations. Such an approach is in line with the intentions of the NPPF and more widely national planning policy which seeks to deliver the housing needed to meet future predictions of demand in a sustainable manner whilst protecting the environment and specifically green-field land from unnecessary development.
- 1.2 The RHA is not anti-development in outlook and recognises the need to deliver new homes to meet the needs and demands of a growing population. Having studied the issues facing Hart District and the proposals put forward by the District Council in the emerging Hart District Local Plan the RHA determined to investigate alternatives to the creation of a new settlement in the countryside. The RHA are convinced that the need for new housing in Hart District both for the current plan period and beyond can be met through the sustainable development of urban brownfield land. They are also of the view that in this way the declining health, vitality and viability of Fleet town centre, acknowledged in the emerging Local Plan can be reversed and, with new investment, the town centre can be regenerated.
- 1.3 The RHA have made representations to the Hart District Local Plan process and these representations detail the development opportunities that are apparent in Fleet town centre to meet some or all of the projected need that the District Council have used to justify a new settlement in the countryside. The submissions to the Local Plan inspector outline the potential for Fleet town centre to accommodate up to a thousand new homes in the plan period.



- 1.4 The largest site identified covers the hart shopping centre, a purpose built shopping mall in the middle of Fleet town centre. LSH have assisted the RHA in preparing a feasibility study for redevelopment of the Hart shopping centre. This is not by any means the only opportunity in the town centre but should stand as an example of what could be achieved should the Council be minded to approach the housing need issue (and indeed the need for the regeneration of the town centre) in this more sustainable manner.
- 1.5 Lambert Smith Hampton have worked with B3R architects to carry out a feasibility study into the redevelopment of the shopping centre based around clearly defined planning principles and policies, an understanding of the site, massing, day-lighting and sun-lighting and a viability assessment to understand whether such a development would be feasible and economically viable. The architectural feasibility study is included at appendix 1 to this report and the viability assessment is included as appendix 2.



2.0 SITE CONTEXT

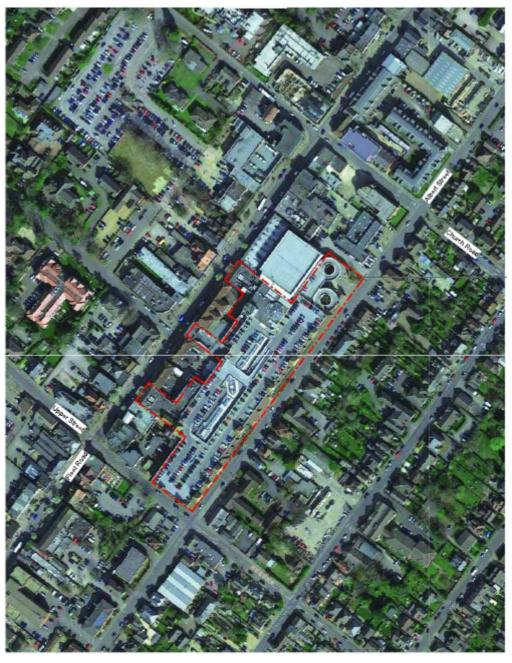
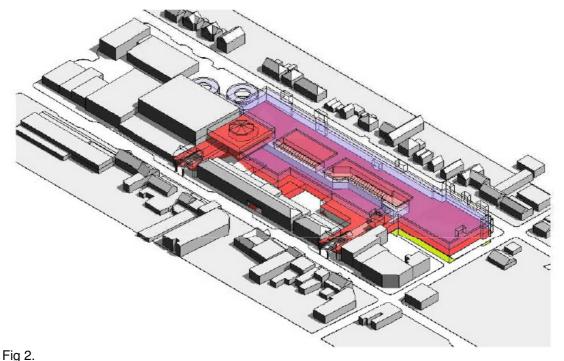


Fig1

2.1 The Hart Shopping Centre is one of four potential housing sites that the RHA highlighted in the Regulation 19 Submission to the emerging Hart Local Plan (attached as appendix 4). The report's intention is to demonstrate that additional housing capacity to meet the identified need for new house-building in Hart District could be met through developing sites within Fleet town centre in preference to the creation of a new settlement in open countryside.

- 2.2 The Hart Shopping Centre is an enclosed shopping mall and car park located on the southern side of Fleet Town Centre, a linear town centre spread out for around 1.5km along Fleet Road which runs south westward from Fleet Station. The town centre is separated from the station by around 500m. The shopping centre was built in the 1990's and is anchored by a Waitrose store on the ground floor at its south-western corner. The centre comprises an arc of shops at ground level running in a loop between two entrances onto Fleet Road (the "high street" for Fleet).
- 2.3 A plan of the centre and its occupiers is included at appendix 3. It can be seen from this plan that, but for Waitrose and a few other notable brands, the centre appears to be struggling and there are significant retail vacancies in the centre at ground floor.



2.4 Beyond the ground floor the northern end of the centre includes a gym and leisure club at first and second floors whilst the remainder of the building comprises two floors of car parking in a fairly haphazard arrangement. The building externally has the appearance or equivalence of a four storey



property. Between the two entrances onto Fleet Road there remains a parade of independent shops outside the freehold of the main shopping centre. Underneath the centre is an under-croft or basement running the length of the building and providing parking and servicing to the shop units.

- 2.5 The centre includes a total of 45 retail outlets of which 11 or 25% are currently vacant. This high vacancy rate compares unfavourably with a vacancy rate of 8.4% outside the Hart Centre in Fleet. Historically the covered shopping centre would have been considered the prime frontage but clearly this position has changed and the declining occupancy will feed declining footfall in the centre and consequently declining income from the car parks. This will result in a cycle of declining returns in the centre as the burden for service charges rises because of falling revenues and that burden will be shared by fewer and fewer occupiers as vacancies increase.
- 2.6 It is important to note that Waitrose, the anchor for the centre have only 4 years to run on their lease and, given the decline in the centre and changes in the convenience retail market, it is by no means certain that they will renew their lease or extend their stay. All of this makes it more likely that the centre will come forward for redevelopment in the short to medium term. This paints a view of the centre as an asset with a declining value and one likely to come forward for redevelopment.
- 2.7 The Hart Centre occupies a site of 1.34 ha sandwiched between Fleet Road to the north-west and Albert Street to the south-east. Beyond Albert Street the land uses are of mixed character with residential uses mixed with community facilities, surgeries, retail uses, clubs and a variety of other properties all of which are low rise and low density.



- 2.8 To the north-west of the site, facing the centre across Fleet Road are a range of two, three and four storey properties comprising shops and offices engaged in a variety of town centre uses.
- 2.9 The feasibility study takes the main bulk of the shopping centre as its site (Fig 1) and excludes the properties between the shopping centre and Fleet Road excepting those either side of the access points. The large M and Co unit adjoining one entrance to the centre and the parade of shops in front of it on Fleet Road are also excluded in the feasibility work. A larger scheme taking in these properties could easily be developed depending upon land ownership issues.
- 2.10 The site all falls within the area defined as Fleet town centre in the extant local plan and in the emerging Hart District Local Plan. As such it is identified as suitable for appropriate town centre uses to include retail, office, commercial, leisure and residential uses. The emerging local plan identifies that Fleet town centre has undergone something of a decline in recent years and yet the plan has no strategy identified to either maintain, sustain or enhance it's vitality and viability. Indeed the plan suggests that such a strategy is unviable.
- 2.11 An important secondary benefit to this piece of work and the Regulation 19 submission is to demonstrate that the Council should develop a strategy for the regeneration of Fleet town centre based around mixed use development supported by the strong values of residential investment. This strategy, rather than driving both commercial and residential development and investment elsewhere should seize the opportunity presented by the need for more housing development and promote a strategy for the centre of regeneration through mixed use redevelopment taking advantage of the one strong advantage Fleet has in terms of residential land prices and demand. Such a strategy would also strongly accord with the policies of the NPPF and a drive



toward sustainable urban development and the Governments stated objective of making the best use of urban brownfield land.



3.0 HART SHOPPING CENTRE, A FEASIBILITY STUDY FOR REGENERATION

3.1 The architectural feasibility study has been produced by 3BR architects who are experienced in town centre, mixed use retail and residential projects. The study takes a pragmatic view in that the level of detail applied reflects the function of the study merely to demonstrate the feasibility of creating a major residential scheme on the site. Structural analysis, ground conditions and other detailed constraints have not been evaluated but assumptions about normal ground conditions and structural details of the existing centre have been made.

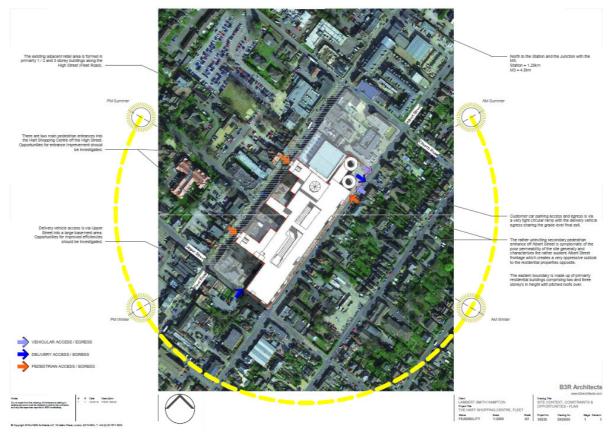


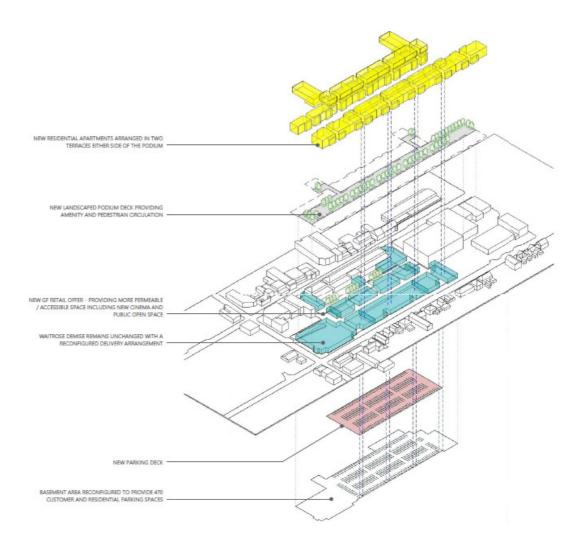
Fig 3.

3.2 The principles of the new design involve stripping back the upper levels of the centre above Waitrose and above ground for the remainder of the centre to create a podium upon which the new shops, cinema and homes can be



constructed. Car parking is removed from the upper floors and relocated at ground and into a basement using the existing servicing and storage undercroft of the building and inserting a mezzanine parking level running below the shops through the centre of the site. The podium level is then formed of a central shopping street with shops and a proposed boutique cinema at ground floor. The shopping area opens up better links to the high street and courtyards to the rear of existing retail premises that front Fleet Road. This will give the centre overall far greater permeability.

- 3.3 The residential properties are sited on the upper floors in a series of street blocks running the length of the site to either side of an open recreational deck containing pedestrian access, garden areas and public spaces.
- 3.4 The new scheme has been designed to take account of daylight and sunlighting (drawing SK0005, the existing plan form (SK0010) and a massing study (SK0006).



- 3.5 The new scheme provides some 3306sq m of retail space, 1815 sq m of supermarket net sales, a cinema of 1661 sq m, 952 sq m community space and 470 car parking spaces matching existing levels of provision. In addition the scheme provides for two terraces of residential accommodation to either side of a raised central garden or garden street. This will include a total of 371 residential units of between 1 and 4 bedrooms ranged as duplexes and apartments (Schedule SK0023). Currently the balance of the development between retail, leisure and residential reflects retaining the majority of the ground floor in active uses. Clearly there may be less demand for this space going forward into the future and a more residential oriented scheme may be possible or even likely.
- 3.6 The scheme will read as four storey from street level both to Albert Road and Fleet Road but rises to six residential storeys at the centre of the site. This will not have any significant visual impact beyond the site to either main frontage.

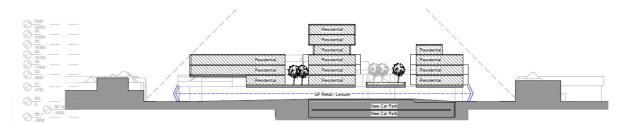


Fig 5.

3.7 The scheme produced whilst of high quality is nothing more than a vanilla attempt to demonstrate what is possible and is designed to sit comfortably within current planning policy and land use considerations. A more ambitions and more commercial scheme could significantly increase the number of units achievable and push the heights and massing envelopes. Additional land at ground floor may also be available to expand the development further. For our purposes however such an exercise is unnecessary.

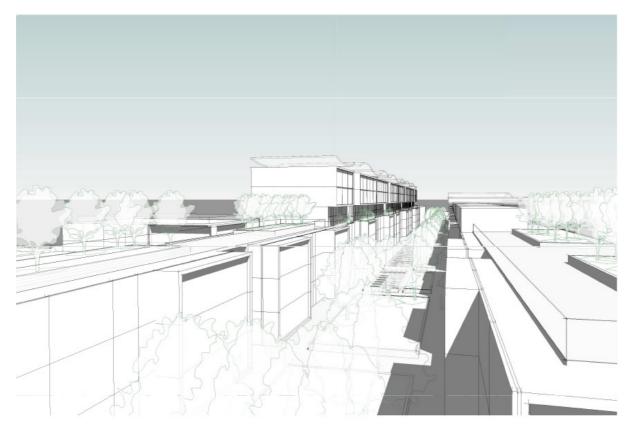


Fig 6.

3.8 The final stage in our feasibility study is to demonstrate that the scheme is economically viable. To do this the Development Team from Lambert Smith Hampton have run the proposed scheme through a viability exercise to understand whether such a proposition, if brought to the development market, would be attractive to developers.



4.0 ECONOMIC VIABILTY

- 4.1 We have assessed the economic viability of the B3R redevelopment scheme and undertaken several development appraisals based on a variety of different scenarios. For clarity, we have split our appraisals between the commercial and residential elements of the proposed scheme.
- 4.2 The commercial element of our appraisal assumes a full refurbishment of the existing shopping centre to create better quality retail units to attract occupiers with a stronger yield profile. We have assumed refurbishment and remodelling costs of £50psf over a 12 month build period, with a total void rate of 18 months following refurbishment. We have discussed values with our Retail Agency team, who have guided our rental and yield assumptions based on current market knowledge. Once completed, the proposed refurbished shopping centre will have an estimated Gross Development Value (GDV) of c. £24.5m.
- 4.3 The residential element of the proposed scheme assumes that the current building structure is suitable to allow for substantial development of the air-space above the existing shopping centre. The scheme provided illustrates a 371 unit flatted development built above Hart Shopping Centre. Assumptions include allowing for 6 months to gain planning consent and a 21 month build programme.
- 4.4 We have considered two scenarios around different assumptions on the levels of affordable housing to be provided:
 - 4.4.1 Full policy compliant affordable housing. This provides a GDV of c. £93.5m.
 - 4.4.2 Reduced affordable housing @ 20% of the overall scheme. This provides an enhanced GDV of £103.25m.

- 4.5 We note that without a detailed building survey and construction plan, this scheme is difficult to price in terms of constructions cost. Therefore, we highlight that a potential increase in construction costs of both £15 and £30 per sq ft would result in reduced land values of £15,834,730 and £11,071,024 respectively. Please note that these values are indicative only and are not to be relied upon.
- 4.6 At this stage we have not undertaken a viability exercise on the basis of Private Rented residential provision although a scheme in such a location and of this scale may be an attractive proposition to the Private Rental Sector (PRS).
- 4.7 The key element of this appraisal for developers is the profit on cost margin. Residential developers tends to require a profit margin range between 20% 30% on development cost, depending on the perceived risks attached to the scheme (such as planning, construction and sales-related risks). We have set our appraisal to generate a profit margin of 20%, which provides a healthy developer profit of c. £15.559m. On this basis, our opinion is that the low planning risk associated with this scheme combined with the potential healthy profit margin will attract developers.
 - 4.8 Furthermore, we envisage that any redevelopment of this Site will likely occur via a Development Agreement (Joint Venture) between the current owners of the Hart Shopping Centre and a major regeneration specialist. The role of the development partner would be to oversee the land assembly, planning phase and then undertake the development process. The Development Partner would also be responsible for funding all planning and development costs from the submission of a full planning application through to the construction and sale of the units. This further removal of risk, as the developer can minimise their capital outlay at the beginning of the project (i.e. they do not need to purchase the Site) has a positive impact on their cash flow and therefore could encourage robust interest from major regeneration specialists.

- 4.9 Notwithstanding these reservations the scheme as developed so far generates a significant surplus, will give a developer a better than 20% return on cost and can be considered economically viable. Having shown our plans to a number of developers in this arena (large scale urban renewal), the interest shown by a number of household names is a positive endorsement of the opportunity that a scheme to redevelop the Hart Centre in this way would attract.
- 4.10 The owners of the Hart Centre are aware of this feasibility exercise and support its conclusions. Discussions between the owners, their agents and interested developer are programmed for Autumn 2018.



5.0 CONCLUSION

- 5.1 The scheme as produced is a technical exercise designed to demonstrate that the site is a realistic development opportunity to deliver housing in Fleet town centre as part of a strategy to encourage greater urban rather than rural development and as a key plank in a strategy for the regeneration of Fleet town centre.
- 5.2 A flatted development of this nature with a range of 1,2 3 and 4 bed apartments would have a population of up to 1000 people generating an on the spot consumer spend for retailing of around £3m a year to support the regeneration of the town centre.
- 5.3 The site chosen is capable of significant enlargement taking in adjoining spaces and sites to increase the residential contribution to housing need. The scheme developed represents a "planning friendly" approach and a more commercial scheme could be developed by an ambitious developer to significantly increase housing numbers.
- 5.4 The development proposition for this site is clearly viable and the response from developers to whom it has been introduced has been both strong and favourable.
- 5.5 This feasibility exercise demonstrates that there remains strong potential for further housing development in Fleet Town Centre and that such development is commercially viable. This is one of four sites identified in the centre and others can also be brought forward. A combination of these sites could provide over 1000 homes in Fleet over the next ten to fifteen years. With proper Council support such a strategy would see the strong regeneration of the town centre and would negate the need for the designation of a site for a new settlement elsewhere. Such a solution to the housing problem that is



faced by Hart is in line with Government Policy, is sustainable and is instantly achievable. Development in Fleet Town Centre should comprise an important part of the Council's housing land supply going forward and form the foundation of a plan for the regeneration of Fleet town centre.



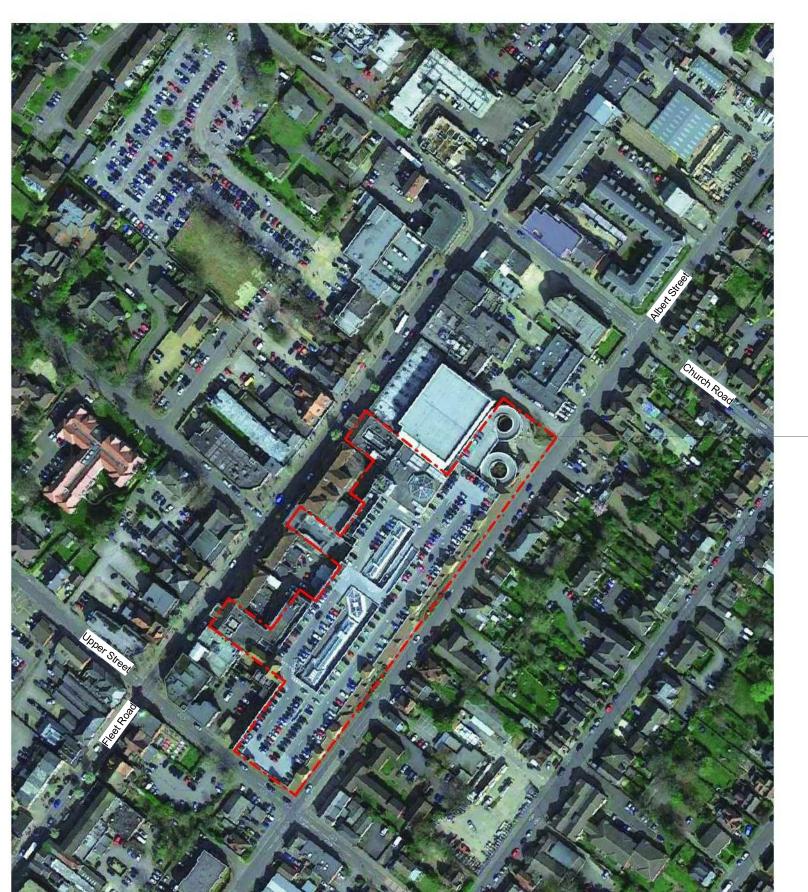
APPENDIX 1:

B3R Hart Centre Feasibility





HART SHOPPING CENTRE, FLEET
A Feasibility Study for Regeneration
10th August 2018



SITE AREA

13420 m²

SITE OUTLINED IN RED

B3R Architects

www.b3rarchitects.com



 The existing adjacent retail area is formed in primarily 1 / 2 and 3 storey buildings along the High Street (Fleet Road).

PM Summer

There are two main pedestrian entrances into the Hart Shopping Centre off the High Street. Opportunities for entrance imprevement should be investigated.

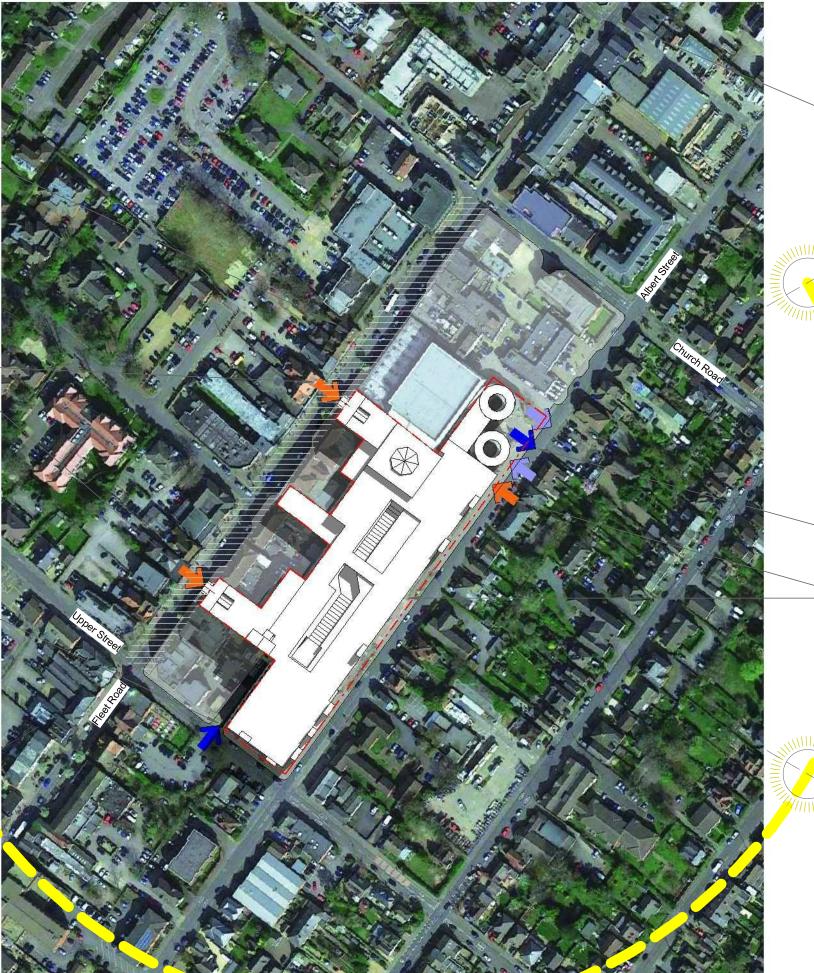
Delivery vehicle access is via Upper Street into a large basement area. Opportunities for improved efficiencies should be investigated.

PM Winter ////////

VEHICULAR ACCESS / EGRESS

DELIVERY ACCESS / EGRESS

PEDESTRIAN ACCESS / EGRESS



North to the Station and the Junction with the

Station = 1.25km M3 = 4.5 km

AM Summer

The rather uninviting secondary pedestrian entrance off Albert Street is symptomatic of the poor permeability of the site generally and characterises the rather austere Albert Street frontage which creates a very oppressive outlook to the residential properties opposite.

Customer car parking access and egress is via a very tight circular ramp with the delivery vehicle egress sharing the grade level final exit.

The eastern boundary is made up of primarily residential buildings comprising two and three storey's in height with pitched roofs over.

B3R Architects

Client: LAMBERT SMITH HAMPTON Project Title: THE HART SHOPPING CENTRE, FLEET

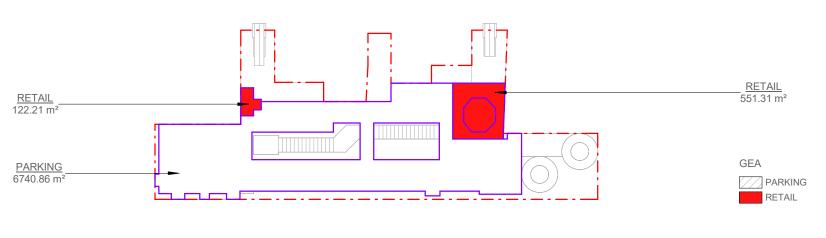
Status: FEASIBILITY

AM Winter

Drawing Title: SITE CONTEXT, CONSTRAINTS & OPPORTUNITIES - PLAN

Scale: 1:2000 18030 SK0005

© Copyright 2018 of B3R Architects LLP, 18 Hatton Place, London, EC1N 8RU, T: +44 (0) 20 7611 5223

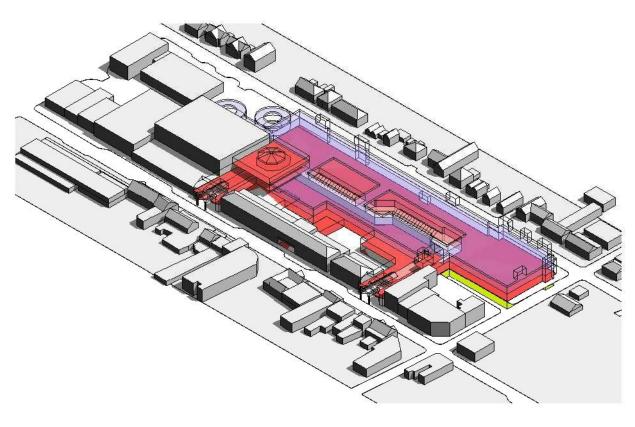




13420 m²

GEA				
LEVEL	USE	AREA		
0B.1	0B.1 DELIVERY	8831 m²		
0G.1	0G. RETAIL	9513 m²		
0G.1	0G. CIRCULATION	1743 m²		
01.	01. RETAIL	2154 m²		
01.	01. PARKING	8325 m²		
02.	02. RETAIL	922 m²		
02.	02. PARKING	6741 m²		
		38228 m²		





Status: FEASIBILITY Scale: 1:2000 **B3R Architects**

SK0010

Client:

LAMBERT SMITH HAMPTON
Project Title:
THE HART SHOPPING CENTRE, FLEET

Sheet: Project No: A3 18030

Building arrangement and areas have been derived from lease diagrams which are open to interpretation.

DELIVERY

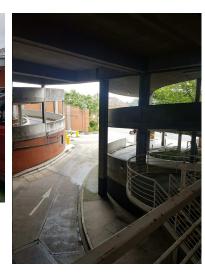
Do not scale from this drawing. All dimensions relating to existing structure must be checked on site by the contractor and any discrepancies reported to B3R immediately.



Investigate opportunities to make the vehicular circulation within the site more efficient.



Investigate opportunities to build above the Level 2 Car Park.



Investigate opportunities to improve primary vehicular circulation into and out of the site.



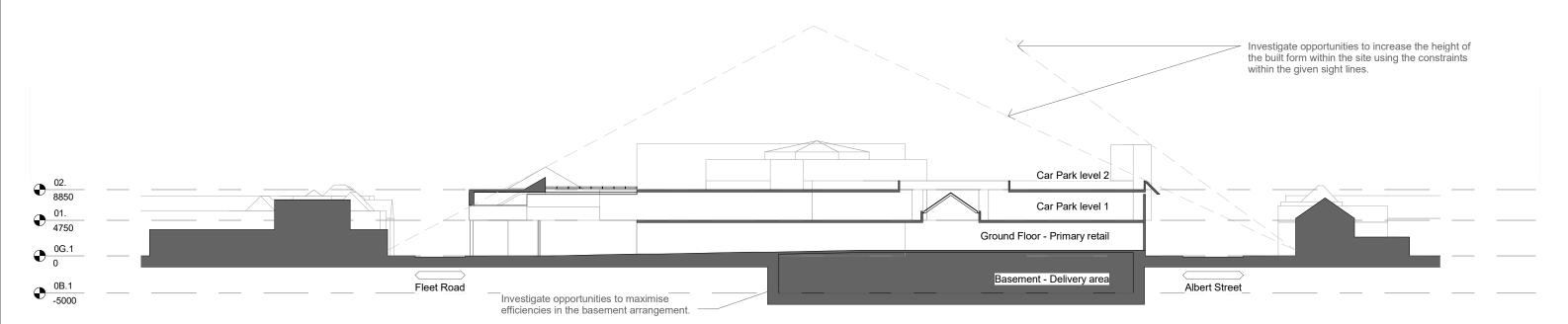
Investigate opportunities to improve the retail offer:



The Level 2 Car Park



Investigate opportunities to enliven the Albert Street elevation:



The existing scale of built form along the High Street would allow a taller built form to be established within our site with little visual impact.







Delivery vehicles access a large basement area



Investigate opportunities to enliven the Albert Street frontage and improve permeability.





B3R Architects

www.b3rarchitects.com

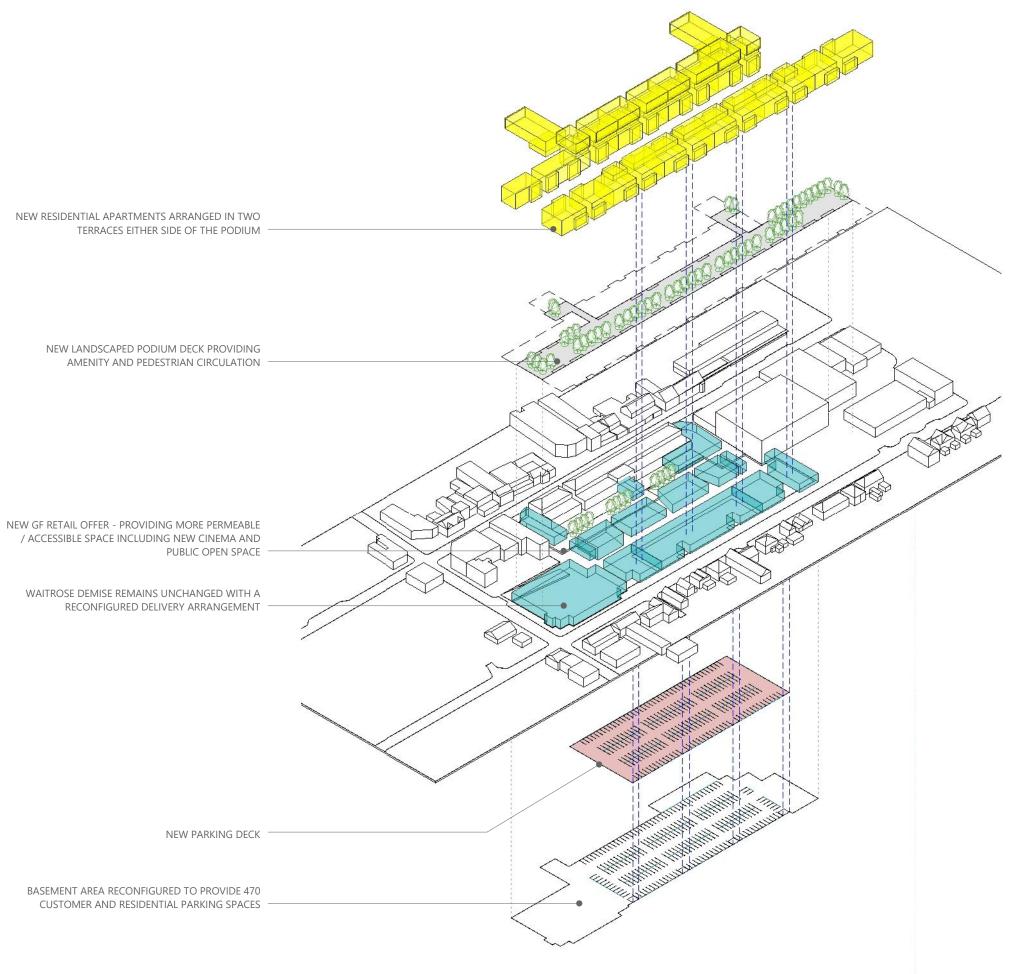
Client: LAMBERT SMITH HAMPTON Project Title: THE HART SHOPPING CENTRE, FLEET

Status: FEASIBILITY Scale: 1:500

Sheet:

Drawing Title: SITE CONTEXT, CONSTRAINTS & OPPORTUNITIES - SECTION

18030



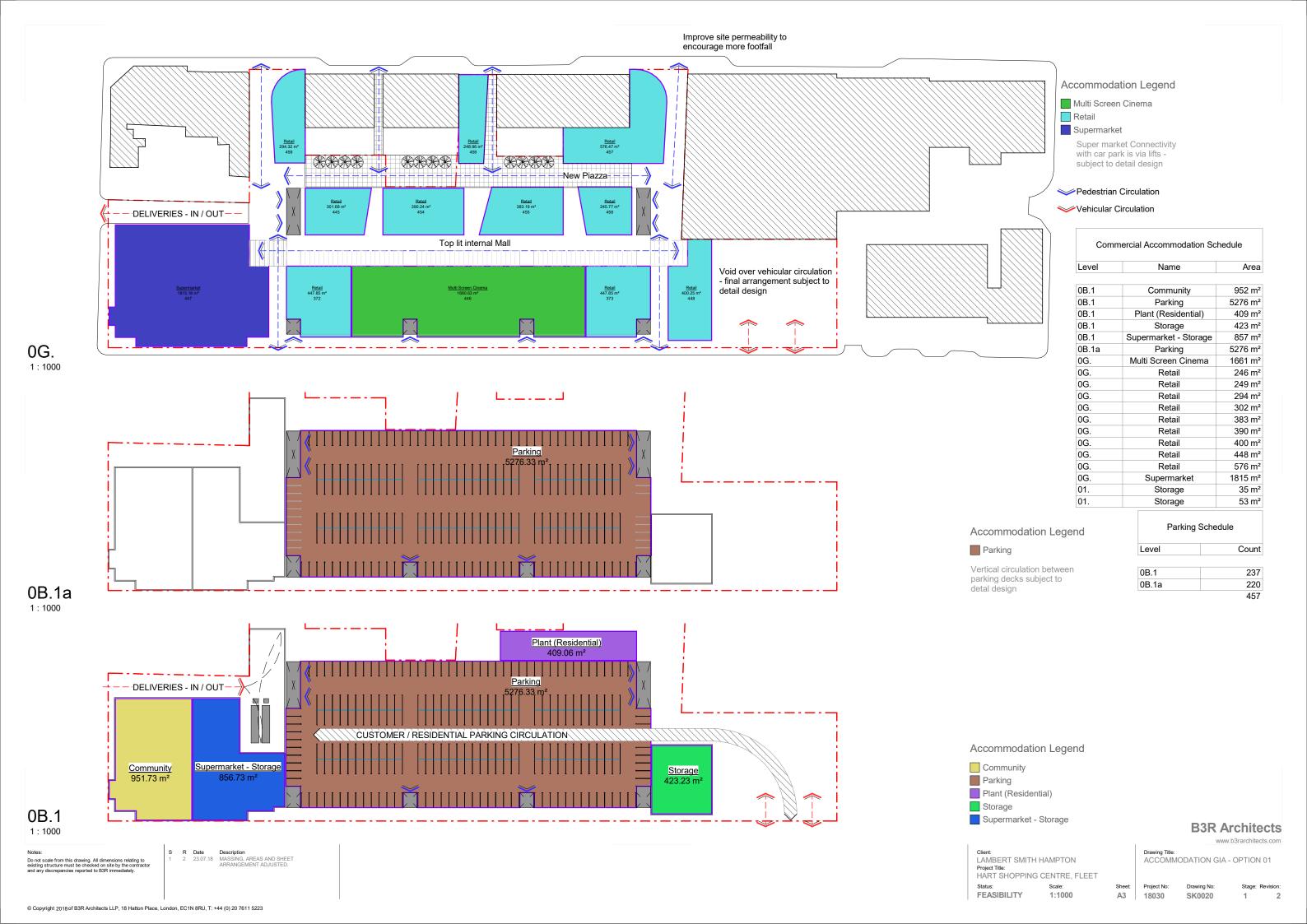
DESIGN PROPOSALS

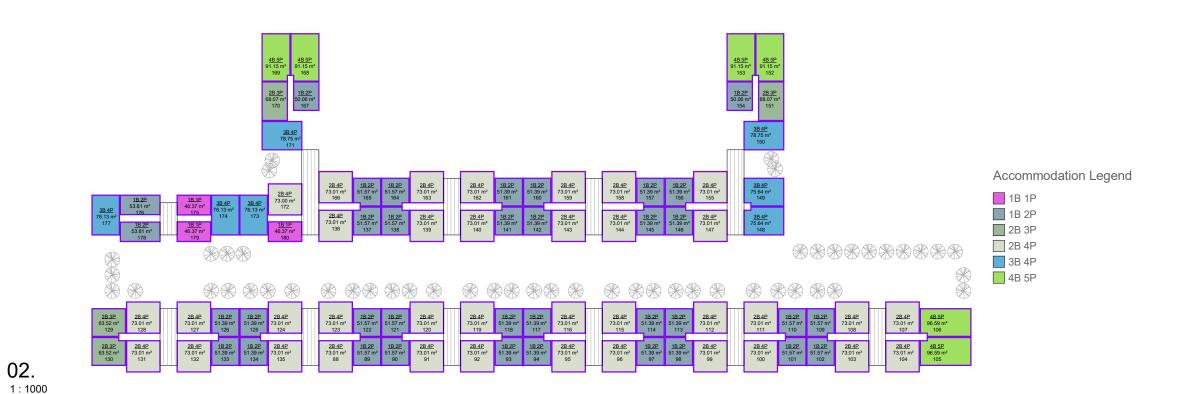
- THE BRIEF IS TO EXPLORE OPPORTUNITIES THAT WOULD ENCOURAGE REGENERATION IN THE TOWN CENTRE OF FLEET.
- THE HART SHOPPING CENTRE SITE HAS BEEN CHOSEN AS A
 TEST BED FOR AN ACADEMIC EXERCISE WHICH LOOKS AT A
 HIGH-DENSITY RESIDENTIAL LED, MIXED USE SCHEME.
- THE SITE ANALYSIS SUGGESTS THAT THE BASEMENT IS
 INEFFICIENT IN ITS USE OF SPACE AND THAT CONSIDERABLE
 AREA IS TAKEN UP BY BOTH COMMERCIAL AND CUSTOMER
 VEHICULAR CIRCULATION ROUTES.
- THE BASEMENT AREA PROVIDES AN OPPORTUNITY FOR RECONFIGURATION WHICH COULD HOUSE THE REQUIRED CUSTOMER AND NEW RESIDENTIAL PARKING. THIS CAN BE ACHIEVED BY RESTRICTING THE TALL, COMMERCIAL VEHICULAR ACCESS TO ONE END WHILE THE REMAINDER OF THE SPACE WILL BE FOR LOWER HEAD HEIGHT, DOMESTIC VEHICLES.
- THE INSERTION OF A PARKING DECK WITHIN THIS DOUBLE
 HEIGHT SPACE WILL ALLOW FOR AN EFFICIENT PARKING
 ARRANGEMENT THAT CAN BE EFFECTIVELY CONNECTED TO
 BOTH GROUND FLOOR RETAIL AND HIGHER LEVEL,
 RESIDENTIAL ACCOMMODATION VIA VERTICAL CIRCULATION
 CORES.
- THE GROUND FLOOR RETAIL OFFER IS PROPOSED AS BEING MORE PERMEABLE AND WILL INTRODUCE NEW OPEN PUBLIC SPACE, JUST OFF THE MAIN HIGH STREET, AS WELL AS A MODIFIED INTERNAL RETAIL ENVIRONMENT. IN ADDITION, THE RETAIL OFFER WILL NOW INCLUDE LEISURE ACTIVITY IN THE FORM OF A BOUTIQUE CINEMA. THE WAITROSE STORE WILL REMAIN, AND A PHASED UPGRADE SOLUTION WILL BE POSSIBLE WHICH WILL ALLOW CONTINUITY OF TRADE.
- NEW RESIDENTIAL ACCOMMODATION IS PROPOSED FROM LEVEL 1 ABOVE, THE NEW LANDSCAPED PODIUM, AND WILL EXTEND UP ACROSS 6 FLOORS AS ILLUSTRATED ON THE PLANS. THE PROPOSED MASSING PRESENTS ON THE SITE BOUNDARY AT FOUR STOREYS WHICH STEPS UP TO 6 STOREYS ON THE INTERNAL ELEMENTS.
- APARTMENTS ARE ARRANGED AS TWO TERRACES,
 ORIENTATED IN A NORTH-SOUTH DIRECTION, EITHER SIDE OF
 THE NEW PODIUM. THIS ARRANGEMENT ALLOWS FOR ALL
 APARTMENTS TO HAVE GOOD EAST / WEST ASPECT.
- APARTMENTS ARE ACCESSED FROM THE PODIUM DECK AND VIA CIRCULATION CORES. APARTMENTS ARE ARRANGED AS CLUSTERS AROUND THE CORES AND ACCESS CAN BE PROVIDED TO ROOF TOP TERRACES, OFFERING FURTHER AMENITY SPACE.
- A MIX OF APARTMENT SIZES CAN BE OFFERED ALONG WITH A
 QUANTUM OF AFFORDABLE HOUSING, SUBJECT TO VIABILITY
 ANALYSIS. THIS STUDY PROVIDES AN INDICATIVE NUMBER OF
 1, 2, 3 & 4 BED UNITS AT 371, WHICH PROVIDES A
 RESIDENTIAL DENSITY OF 276 UNITS / HECTARE.

B3R Architects

www.b3rarchitects.com

Do not scale from this drawing. All dimensions relating to existing structure must be checked on site by the contractor





Accommodation Legend 1B 1P 1B 2P 2B 3P 2B 4P *** 3B 4P 4B 5P Storage Podium deck level -Residential amenity space 2B 4P 73.01 m² 44 Pedestrian Circulation

01. 1: 1000

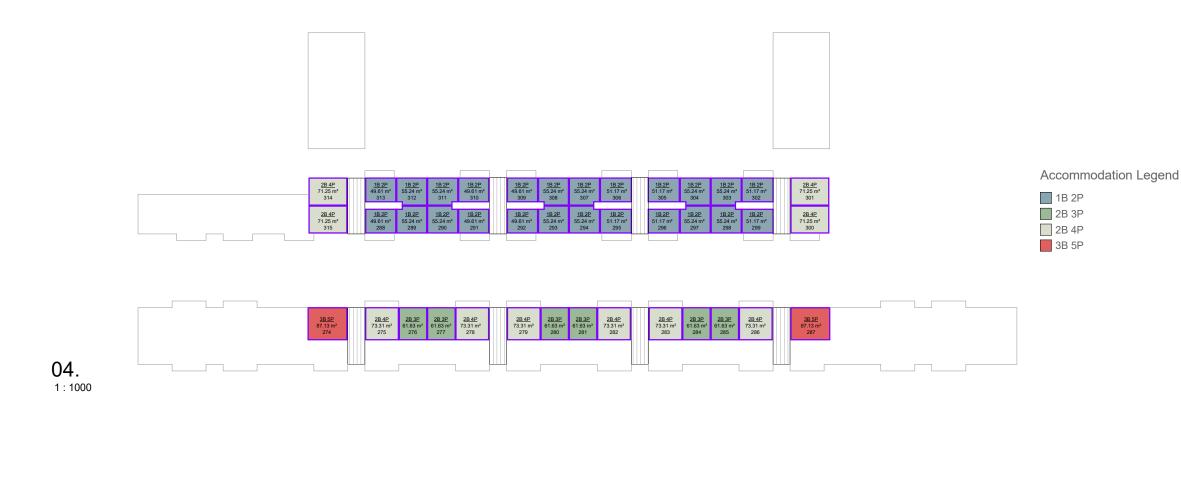
B3R Architects

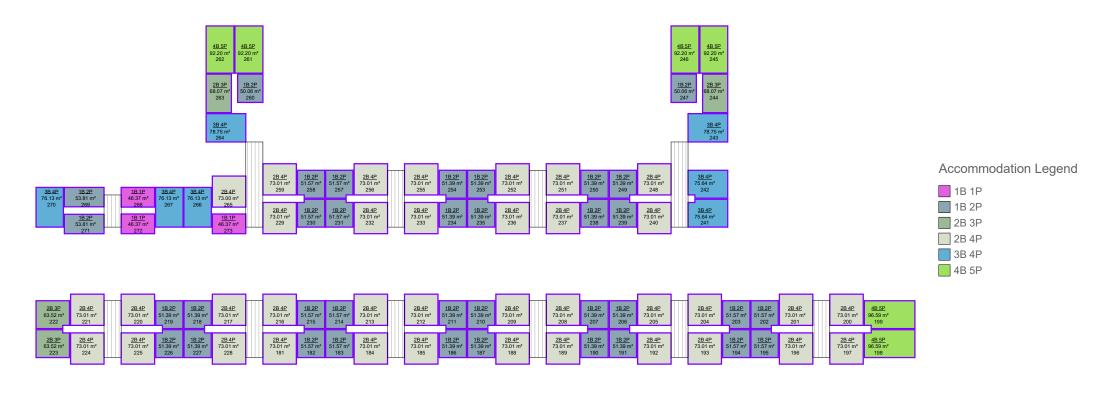
www.b3rarchitects.

Notes:

Do not scale from this drawing. All dimensions relating to existing structure must be checked on site by the contractor and any discrepancies reported to B3R immediately.

S R Date Description
1 2 23.07.18 MASSING, AREAS AND SHEET ARRANGEMENT ADJUSTED.





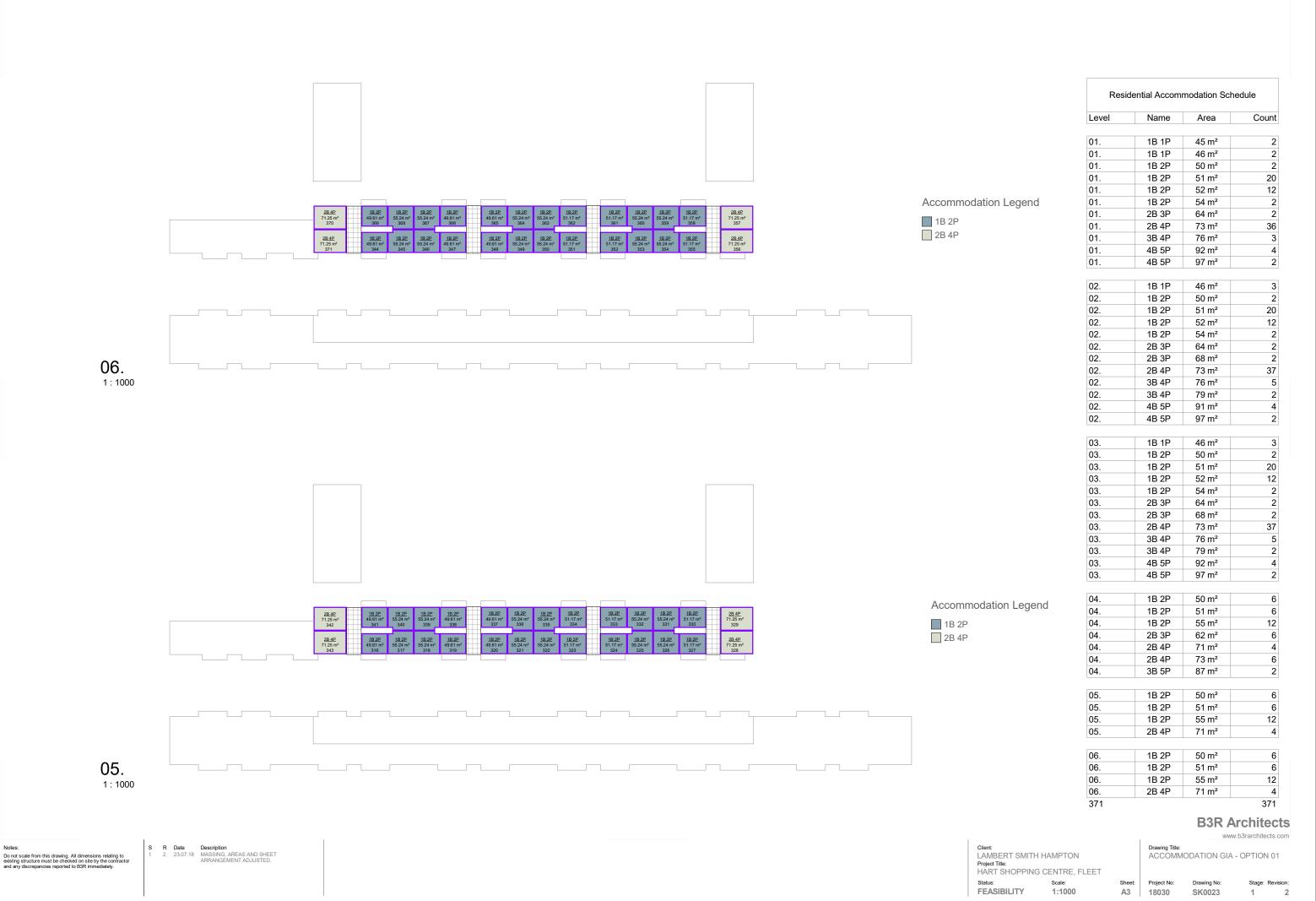
Notes:
Do not scale from this drawing. All dimensions relating to existing structure must be checked on site by the contractor and any discrepancies reported to BSR immediately.

S R Date Description
1 1 23.07.18 MASSING, AREAS AND SHEET ARRANGEMENT ADJUSTED.

B3R Architects

Client:
LAMBERT SMITH HAMPTON
Project Title:
HART SHOPPING CENTRE, FLEET
Status:
Scale:
Sheet:
Project No: Drawing No: Stage: Revision:
A3 18030 SK0022 1 1

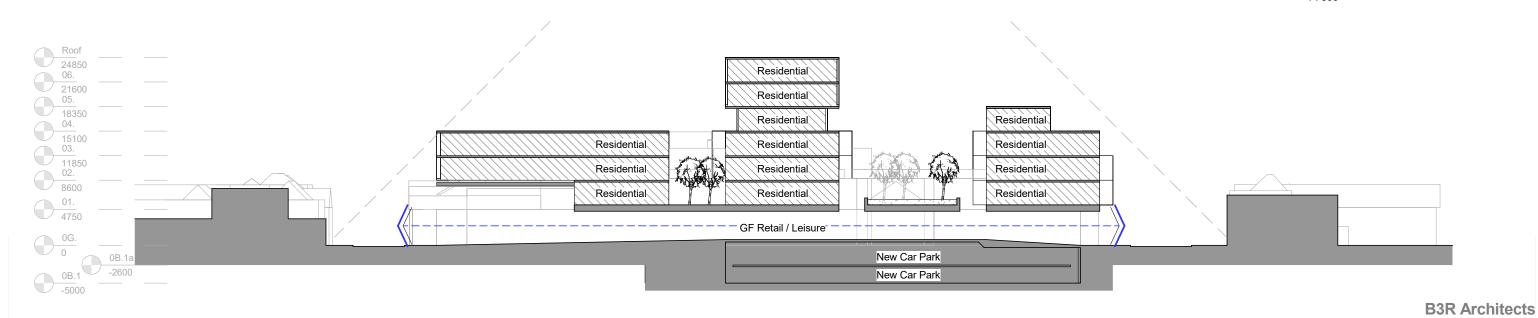
03. 1:1000





Massing Overlay

Massing Section



Client: LAMBERT SMITH HAMPTON Project Title: HART SHOPPING CENTRE, FLEET Drawing Title: MASSING OVERLAY DIAGRAM

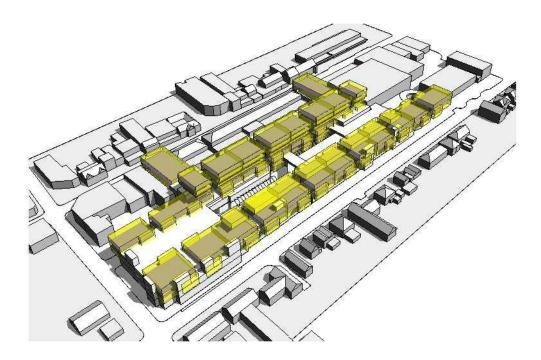
Status: FEASIBILITY Scale: Varries

Sheet: Project No: A3 18030 SK0025

© Copyright 2018 of B3R Architects LLP, 18 Hatton Place, London, EC1N 8RU, T: +44 (0) 20 7611 5223

Do not scale from this drawing. All dimensions relating to existing structure must be checked on site by the contractor and any discrepancies reported to B3R immediately.

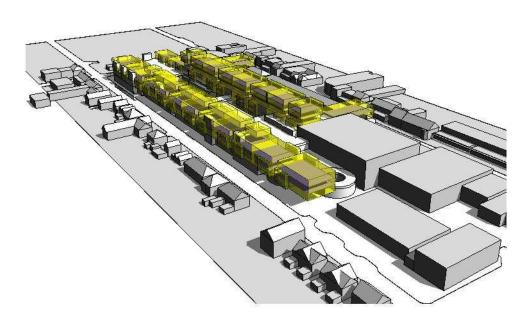
S R Date Description
1 2 23.07.18 MASSING, AREAS AND SHEET ARRANGEMENT ADJUSTED.



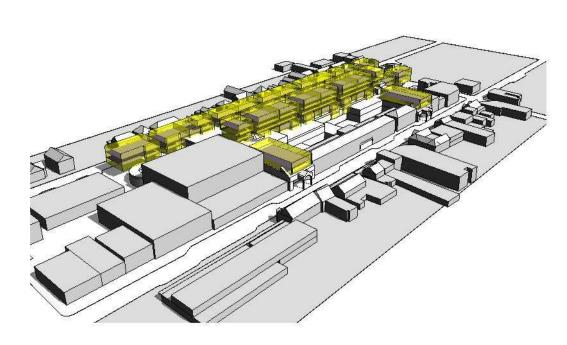
SE View



SW View



NE View



NW View

B3R Architects

www.b3rarchitects

Client:
LAMBERT SMITH HAMPTON
Project Title:
HART SHOPPING CENTRE FLE

HART SHOPPING CENTRE, F
Status: Scale:
FEASIBILITY NTS

Drawing Title: MASSING OVERLAY VIEWS

t: Project No: Drawing No: Stage: F

Notes:

Do not scale from this drawing. All dimensions relating to existing structure must be checked on site by the contractor

S R Date Description
1 2 23.07.18 MASSING, AREAS AND SHEET
ADDANGEMENT AD U.STED









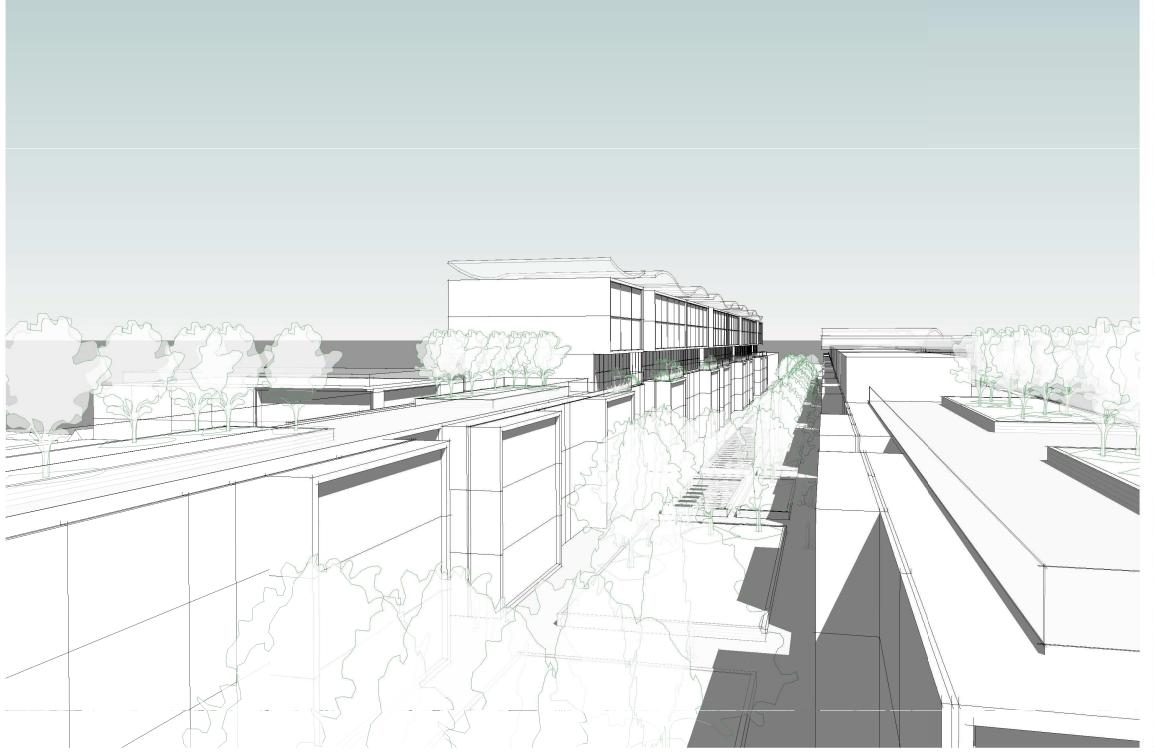
EXAMPLES OF HIGH DENSITY RESIDENTIAL LEAD MIXED USE PROPOSALS

B3R Architects

Client: LAMBERT SMITH HAMPTON Project Title: HART SHOPPING CENTRE, FLEET Status: FEASIBILITY

Drawing Title: IMAGE SHEET 01

Sheet: Project No: A3 18030 SK0030





EXAMPLES OF LANDSCAPED PODIUM AREAS PROVIDING BOTH PHYSICAL AND VISUAL AMENITY



NEW PODIUM BETWEEN RESIDENTIAL TERRACES

B3R Architects

Client: LAMBERT SMITH HAMPTON Project Title: HART SHOPPING CENTRE, FLEET

Drawing Title: IMAGE SHEET 02

Sheet: Project No: 18030 SK0031







LOOKING SOUTH ALONG FLEET ROAD





LOOKING NORTH ALONG FLEET ROAD







EXAMPLES OF EXCITING ENTRANCES AND INTERIORS OF MODERN ARCHITECTURE

IMPROVED PEDESTRIAN
PERMEABILITY AND VISUAL
LINKAGE OF THE NEW EXTERNAL
AND INTERNAL SPACES WILL
IMPROVE FOOTFALL AND MAKE
THE SHOPPING CENTRE MORE
ACTIVE

INTERNAL STREET

Client: LAMBERT SMITH HAMPTON Project Title: HART SHOPPING CENTRE, FLEET Status: FEASIBILITY

B3R Architects Drawing Title: IMAGE SHEET 03 Sheet: Project No: 18030

SK0032



APPENDIX 2:

Development Appraisal

LAMBERT SMITH HAMPTON

Harts Shopping Centre - 20% Affordable Indicative Appraisal Only for Marketing Purposes Not to be Relied Upon

Summary Appraisal for Phase 1

Currency in £

REVENUE					
Sales Valuation	Units	ft²	Rate ft ²	Unit Price	Gross Sales
Level 1 - 1B1P	2	968	450.00	217,800	435,600
Level 1 - 1B1P	2	990	450.00	222,840	445,680
Level 1 - 1B2P	2	1,077	450.00	242,280	484,560
Level 1 - 1B2P	14	7,683	450.00	246,960	3,457,440
Level 1 - 1B2P	6	3,360	450.00	252,000	1,512,000
Level 1 - 1B2P	2	1,163	450.00	261,720	523,440
Level 1 - 2B3P	1	689	450.00	309,960	309,960
Level 1 - 2B4P	26	20,426	450.00	353,520	9,191,520
Level 1 - 3B4P	2 2	1,637	450.00	368,280	736,560 891,360
Level 1 - 4B5P Level 1 - 4B5P	2	1,981	450.00	445,680	,
Level 2 - 1B1P	3	2,088 1,486	450.00 450.00	469,800 222,840	939,600 668,520
Level 2 - 1B11 Level 2 - 1B2P	5	2,800	450.00	252,000	1,260,000
Level 2 - 1B2P	2	1,077	450.00	242,280	484,560
Level 2 - 1B2P	14	7,683	450.00	246,960	3,457,440
Level 2 - 1B2P	2	1,163	450.00	261,720	523,440
Level 2 - 2B3P	1	689	450.00	309,960	309,960
Level 2 - 2B3P	2	1,464	450.00	329,400	658,800
Level 2 - 2B4P	29	22,782	450.00	353,520	10,252,080
Level 2 - 3B4P	4	3,274	450.00	368,280	1,473,120
Level 2 - 3B4P	2	1,701	450.00	382,680	765,360
Level 2 - 4B5P	2	1,958	450.00	440,640	881,280
Level 2 - 4B5P	2	2,088	450.00	469,800	939,600
Level 3 -1B1P	3	1,486	450.00	222,840	668,520
Level 3 - 1B2P	2	1,077	450.00	242,280	484,560
Level 3 - 1B2P	14	7,683	450.00	246,960	3,457,440
Level 3 - 1B2P	5	2,800	450.00	252,000	1,260,000
Level 3 - 1B2P	2	1,163	450.00	261,720	523,440
Level 3 - 2B3P	1	689	450.00	309,960	309,960
Level 3 - 2B3P	2	1,464	450.00	329,400	658,800
Level 3 - 2B4P	29	22,782	450.00	353,520	10,252,080
Level 3 - 3B4P	4	3,274	450.00	368,280	1,473,120
Level 3 - 3B4P	2	1,701	450.00	382,680	765,360
Level 3 - 4B5P	4	3,962	450.00	445,680	1,782,720
Level 3 - 4B5P	2	2,088	450.00	469,800	939,600
Level 4 - 1B2P	6	3,230	450.00	242,280	1,453,680
Level 4 - 1B2P	6	3,293	450.00	246,960	1,481,760
Level 4 - 1B2P	12	7,104	450.00	266,400	3,196,800
Level 4 - 2B3P	6	4,003	450.00	300,240	1,801,440
Level 4 - 2B4P	4	3,056	450.00	343,800	1,375,200
Level 4 - 2B4P	6	4,714	450.00	353,520	2,121,120
Level 4 - 3B5P Level 5 - 1B2P	2 6	1,874 3,230	450.00 450.00	421,560 242,280	843,120 1,453,680
Level 5 - 1B2P	6		450.00	246,960	
Level 5 - 1B2P	12	3,293 7,104	450.00	266,400	1,481,760 3,196,800
Level 5 - 1B21 Level 5 - 2B4P	4	3,056	450.00	343,800	1,375,200
Level 6 - 1B2P	6	3,230	450.00	242,280	1,453,680
Level 6 - 1B2P	6	3,293	450.00	246,960	1,481,760
Level 6 - 1B2P	12	7,104	450.00	266,400	3,196,800
Level 6 - 2B4P	4	3,056	450.00	343,800	1,375,200
Social - 1B2P	19	10,640	210.00	117,600	2,234,400
Intermediate - 1B2P	19	10,427	300.00	164,640	3,128,160
Social - 2B3P	2	1,378	210.00	144,648	289,296
Intermediate - 2B3P	1	689	300.00	206,640	206,640
Social - 2B4P	13	10,213	210.00	164,976	2,144,688
Intermediate - 2B4P	13	10,213	300.00	235,680	3,063,840
Social - 3B4P	1	818	210.00	171,864	171,864
Intermediate - 3B4P	2	1,637	300.00	245,520	491,040
Social - 4B5P	2	1,981	210.00	207,984	415,968

LAMBERT SMITH HAMPTON

Harts Shopping Centre - 20% Affordable Indicative Appraisal Only for Marketing Purposes Not to be Relied Upon

Intermediate - 4B5P	<u>2</u>	<u>1,981</u>	300.00	297,120	594,240
Totals	371	251,010			103,205,616

NET REALISATION 103,205,616

OUTLAY

ACQUISITION COSTS

 Residualised Price
 20,276,187

 Stamp Duty
 1,003,309

 Agent Fee
 1.00%
 202,762

 Legal Fee
 0.80%
 162,209

 Town Planning
 100,000

 Survey
 50,000

1,518,281

CONSTRUCTION COSTS

CINSTRUCTION COSTS			
Construction	ft²	Rate ft ²	Cost
Level 1 - 1B1P	1,210 ft ²	150.00 pf ²	181,500
Level 1 - 1B1P	1,238 ft ²	150.00 pf ²	185,700
Level 1 - 1B2P	1,346 ft ²	150.00 pf ²	201,900
Level 1 - 1B2P	9,604 ft ²	150.00 pf ²	1,440,600
Level 1 - 1B2P	4,200 ft ²	150.00 pf ²	630,000
Level 1 - 1B2P	1,454 ft ²	150.00 pf ²	218,100
Level 1 - 2B3P	861 ft ²	150.00 pf ²	129,150
Level 1 - 2B4P	25,532 ft ²	150.00 pf ²	3,829,800
Level 1 - 3B4P	2,046 ft ²	150.00 pf ²	306,900
Level 1 - 4B5P	2,476 ft ²	150.00 pf ²	371,400
Level 1 - 4B5P	2,610 ft ²	150.00 pf ²	391,500
Level 2 - 1B1P	1,857 ft ²	150.00 pf ²	278,550
Level 2 - 1B2P	3,500 ft ²	150.00 pf ²	525,000
Level 2 - 1B2P	1,346 ft ²	150.00 pf ²	201,900
Level 2 - 1B2P	9,604 ft ²	150.00 pf ²	1,440,600
Level 2 - 1B2P	1,454 ft ²	150.00 pf ²	218,100
Level 2 - 2B3P	861 ft ²	150.00 pf ²	129,150
Level 2 - 2B3P	1,830 ft ²	150.00 pf ²	274,500
Level 2 - 2B4P	28,478 ft ²	150.00 pf ²	4,271,700
Level 2 - 3B4P	4,092 ft ²	150.00 pf ²	613,800
Level 2 - 3B4P	2,126 ft ²	150.00 pf ²	318,900
Level 2 - 4B5P	2,448 ft ²	150.00 pf ²	367,200
Level 2 - 4B5P	2,610 ft ²	150.00 pf ²	391,500
Level 3 -1B1P	1,857 ft ²	150.00 pf ²	278,550
Level 3 - 1B2P	1,346 ft ²	150.00 pf ²	201,900
Level 3 - 1B2P	9,604 ft ²	150.00 pf ²	1,440,600
Level 3 - 1B2P	3,500 ft ²	150.00 pf ²	525,000
Level 3 - 1B2P	1,454 ft ²	150.00 pf ²	218,100
Level 3 - 2B3P	861 ft ²	150.00 pf ²	129,150
Level 3 - 2B3P	1,830 ft ²	150.00 pf ²	274,500
Level 3 - 2B4P	28,478 ft ²	150.00 pf ²	4,271,700
Level 3 - 3B4P	4,092 ft ²	150.00 pf ²	613,800
Level 3 - 3B4P	2,126 ft ²	150.00 pf ²	318,900
Level 3 - 4B5P	4,952 ft ²	150.00 pf ²	742,800
Level 3 - 4B5P	2,610 ft ²	150.00 pf ²	391,500
Level 4 - 1B2P	4,038 ft ²	150.00 pf ²	605,700
Level 4 - 1B2P	4,116 ft ²	150.00 pf ²	617,400
Level 4 - 1B2P	8,880 ft ²	150.00 pf ²	1,332,000
Level 4 - 2B3P	5,004 ft ²	150.00 pf ²	750,600
Level 4 - 2B4P	3,820 ft ²	150.00 pf ²	573,000
Level 4 - 2B4P	5,892 ft ²	150.00 pf ²	883,800
Level 4 - 3B5P	2,342 ft ²	150.00 pf ²	351,300
Level 5 - 1B2P	4,038 ft ²	150.00 pf ²	605,700
Level 5 - 1B2P	4,116 ft ²	150.00 pf ²	617,400
Level 5 - 1B2P	8,880 ft ²	150.00 pf ²	1,332,000
Level 5 - 2B4P	3,820 ft ²	150.00 pf ²	573,000
Level 6 - 1B2P	4,038 ft ²	150.00 pf ²	605,700
Level 6 - 1B2P	4,116 ft ²	150.00 pf ²	617,400
	.,		,

LAMBERT SMITH HAMPTON

Harts Shopping Centre - 20% Affordable **Indicative Appraisal Only for Marketing Purposes** Not to be Relied Upon

Not to be itelied opon				
Level 6 - 1B2P	8,880 ft ²	150.00 pf ²	1,332,000	
Level 6 - 2B4P	3,820 ft ²	150.00 pf ²	573,000	
Social - 1B2P	13,300 ft ²	150.00 pf ²	1,995,000	
Intermediate - 1B2P	13,034 ft ²	150.00 pf ²	1,955,100	
Social - 2B3P	1,722 ft ²	150.00 pf ²	258,300	
Intermediate - 2B3P	861 ft ²	150.00 pf ²	129,150	
Social - 2B4P	12,766 ft ²	150.00 pf ²	1,914,900	
Intermediate - 2B4P	12,766 ft ²	150.00 pf ²	1,914,900	
Social - 3B4P	1,023 ft ²	150.00 pf ²	153,450	
Intermediate - 3B4P	2,046 ft ²	150.00 pf ²	306,900	
Social - 4B5P	2,476 ft ²	150.00 pf ²	371,400	
Intermediate - 4B5P	2,476 ft ²	150.00 pf ²	371,400	
Totals	313,763 ft ²		47,064,450	47,064,450
Contingency		5.00%	2,353,222	
S106		2.00%	753,879	
				3,107,101
PROFESSIONAL FEES				
Professional Fees		10.00%	4,941,767	
Project Manager		2.00%	988,353	
				5,930,121
MARKETING & LETTING				
Marketing			150,000	
				150,000
DISPOSAL FEES				
Sales Agent Fee		1.00%	1,032,056	
Sales Legal Fee		0.50%	516,028	
				1,548,084
VAT				
Total Paid			200,662	
Balance				200,662
FINANCE				
Timescale	Duration	Commences		
Pre-Construction	6	Jul 2018		

Timescale	Duration	Commences
Pre-Construction	6	Jul 2018
Construction	21	Jan 2019
Sale	15	Oct 2020
Total Duration	42	

Debit Rate 6.000%, Credit Rate 0.000% (Nominal)

Land 3,009,331 Construction 2,741,114 Other 459,332

Total Finance Cost 6,209,777

TOTAL COSTS 86,004,664

PROFIT

17,200,952

Date: 06/08/2018

Performance Measures

20.00% Profit on Cost% Profit on GDV% 16.67% Profit on NDV% 16.67% IRR 19.08% Profit Erosion (finance rate 6.000%) 3 yrs 1 mth

LAMBERT SMITH HAMPTON

Harts Shopping Centre - 40% Affordable Indicative Appraisal Only for Marketing Purposes Not to be Relied Upon

Summary Appraisal for Phase 1

Currency in £

REVENUE					
Sales Valuation	Units	ft²	Rate ft ²	Unit Price	Gross Sales
Level 1 - 1B1P	2	968	450.00	217,800	435,600
Level 1 - 1B1P	2	990	450.00	222,840	445,680
Level 1 - 1B2P	2	1,077	450.00	242,280	484,560
Level 1 - 1B2P	4	2,195	450.00	246,960	987,840
Level 1 - 1B2P	6	3,360	450.00	252,000	1,512,000
Level 1 - 1B2P	2 1	1,163 689	450.00	261,720	523,440
Level 1 - 2B3P Level 1 - 2B4P	13	10,213	450.00 450.00	309,960	309,960
Level 1 - 3B4P	2	1,637	450.00	353,520 368,280	4,595,760 736,560
Level 1 - 4B5P	2	1,981	450.00	445,680	891,360
Level 1 - 4B5P	2	2,088	450.00	469,800	939,600
Level 2 - 1B1P	3	1,486	450.00	222,840	668,520
Level 2 - 1B2P	5	2,800	450.00	252,000	1,260,000
Level 2 - 1B2P	2	1,077	450.00	242,280	484,560
Level 2 - 1B2P	5	2,744	450.00	246,960	1,234,800
Level 2 - 1B2P	2	1,163	450.00	261,720	523,440
Level 2 - 2B3P	1	689	450.00	309,960	309,960
Level 2 - 2B3P	2	1,464	450.00	329,400	658,800
Level 2 - 2B4P	16	12,570	450.00	353,520	5,656,320
Level 2 - 3B4P	2	1,637	450.00	368,280	736,560
Level 2 - 3B4P	2	1,701	450.00	382,680	765,360
Level 2 - 4B5P	1	979	450.00	440,640	440,640
Level 2 - 4B5P	1	1,044	450.00	469,800	469,800
Level 3 -1B1P	3	1,486	450.00	222,840	668,520
Level 3 - 1B2P	2	1,077	450.00	242,280	484,560
Level 3 - 1B2P	4	2,195	450.00	246,960	987,840
Level 3 - 1B2P	5	2,800	450.00	252,000	1,260,000
Level 3 - 1B2P	2	1,163	450.00	261,720	523,440
Level 3 - 2B3P	1 1	689 732	450.00	309,960	309,960
Level 3 - 2B3P Level 3 - 2B4P	29	22,782	450.00 450.00	329,400 353,520	329,400 10,252,080
Level 3 - 3B4P	3	2,455	450.00	368,280	1,104,840
Level 3 - 3B4P	2	1,701	450.00	382,680	765,360
Level 3 - 4B5P	2	1,981	450.00	445,680	891,360
Level 3 - 4B5P	2	2,088	450.00	469,800	939,600
Level 4 - 1B2P	6	3,230	450.00	242,280	1,453,680
Level 4 - 1B2P	6	3,293	450.00	246,960	1,481,760
Level 4 - 1B2P	3	1,776	450.00	266,400	799,200
Level 4 - 2B3P	4	2,669	450.00	300,240	1,200,960
Level 4 - 2B4P	4	3,056	450.00	343,800	1,375,200
Level 4 - 2B4P	6	4,714	450.00	353,520	2,121,120
Level 4 - 3B5P	2	1,874	450.00	421,560	843,120
Level 5 - 1B2P	6	3,230	450.00	242,280	1,453,680
Level 5 - 1B2P	6	3,293	450.00	246,960	1,481,760
Level 5 - 1B2P	12	7,104	450.00	266,400	3,196,800
Level 5 - 2B4P	4	3,056	450.00	343,800	1,375,200
Level 6 - 1B2P	6	3,230	450.00	242,280	1,453,680
Level 6 - 1B2P Level 6 - 1B2P	6 12	3,293	450.00	246,960 266,400	1,481,760
Level 6 - 162P Level 6 - 2B4P	4	7,104 3,056	450.00 450.00	343,800	3,196,800 1,375,200
Social - 1B2P	38	21,280	210.00	117,600	4,468,800
Intermediate - 1B2P	38	20,854	300.00	164,640	6,256,320
Social - 2B3P	4	2,755	210.00	144,648	578,592
Intermediate - 2B3P	2	1,378	300.00	206,640	413,280
Social - 2B4P	26	20,426	210.00	164,976	4,289,376
Intermediate - 2B4P	26	20,426	300.00	235,680	6,127,680
Social - 3B4P	2	1,637	210.00	171,864	343,728
Intermediate - 3B4P	4	3,274	300.00	245,520	982,080
Social - 4B5P	4	3,962	210.00	207,984	831,936

LAMBERT SMITH HAMPTON

Harts Shopping Centre - 40% Affordable **Indicative Appraisal Only for Marketing Purposes** Not to be Relied Upon

Intermediate - 4B5P Totals	371	3,962 250,792	300.00	297,120	1,188,480 93,358,272
NET REALISATION				93,358,272	
OUTLAY					
ACQUISITION COSTS					
Residualised Price			14,222,427		
				14,222,427	
Stamp Duty			700,621		
Agent Fee		1.00%	142,224		
Legal Fee		0.80%	113,779		
Town Planning			100,000		
Survey			50,000		
				1,106,625	
CONSTRUCTION COSTS					
Construction	ft²	Rate ft ²	Cost		
Level 1 - 1B1P	1,210 ft ²	150.00 pf ²	181,500		
Level 1 - 1B1P	1,238 ft ²	150.00 pf ²	185,700		
Level 1 - 1B2P	1,346 ft ²	150.00 pf ²	201,900		
Level 1 - 1B2P	2,744 ft ²	150.00 pf ²	411,600		
Level 1 - 1B2P	4,200 ft ²	150.00 pf ²	630,000		
Level 1 - 1B2P	1 454 ft ²	150 00 nf ²	218 100		

Level 1 - 1B1P	1,210 ft ²	150.00 pf ²	181,500
Level 1 - 1B1P	1,238 ft ²	150.00 pf ²	185,700
Level 1 - 1B2P	1,346 ft ²	150.00 pf ²	201,900
Level 1 - 1B2P	2,744 ft ²	150.00 pf ²	411,600
Level 1 - 1B2P	4,200 ft ²	150.00 pf ²	630,000
Level 1 - 1B2P	1,454 ft ²	150.00 pf ²	218,100
Level 1 - 2B3P	861 ft ²	150.00 pf ²	129,150
Level 1 - 2B4P	12,766 ft ²	150.00 pf ²	1,914,900
Level 1 - 3B4P	2,046 ft ²	150.00 pf ²	306,900
Level 1 - 4B5P	2,476 ft ²	150.00 pf ²	371,400
Level 1 - 4B5P	2,610 ft ²	150.00 pf ²	391,500
Level 2 - 1B1P	1,857 ft ²	150.00 pf ²	278,550
Level 2 - 1B2P	3,500 ft ²	150.00 pf ²	525,000
Level 2 - 1B2P	1,346 ft ²	150.00 pf ²	201,900
Level 2 - 1B2P	3,430 ft ²	150.00 pf ²	514,500
Level 2 - 1B2P	1,454 ft ²	150.00 pf ²	218,100
Level 2 - 2B3P	861 ft ²	150.00 pf ²	129,150
Level 2 - 2B3P	1,830 ft ²	150.00 pf ²	274,500
Level 2 - 2B4P	15,712 ft ²	150.00 pf ²	2,356,800
Level 2 - 3B4P	2,046 ft ²	150.00 pf ²	306,900
Level 2 - 3B4P	2,126 ft ²	150.00 pf ²	318,900
Level 2 - 4B5P	1,224 ft ²	150.00 pf ²	183,600
Level 2 - 4B5P	1,305 ft ²	150.00 pf ²	195,750
Level 3 -1B1P	1,857 ft ²	150.00 pf ²	278,550
Level 3 - 1B2P	1,346 ft ²	150.00 pf ²	201,900
Level 3 - 1B2P	2,744 ft ²	150.00 pf ²	411,600
Level 3 - 1B2P	3,500 ft ²	150.00 pf ²	525,000
Level 3 - 1B2P	1,454 ft ²	150.00 pf ²	218,100
Level 3 - 2B3P	861 ft ²	150.00 pf ²	129,150
Level 3 - 2B3P	915 ft ²	150.00 pf ²	137,250
Level 3 - 2B4P	28,478 ft ²	150.00 pf ²	4,271,700
Level 3 - 3B4P	3,069 ft ²	150.00 pf ²	460,350
Level 3 - 3B4P	2,126 ft ²	150.00 pf ²	318,900
Level 3 - 4B5P	2,476 ft ²	150.00 pf ²	371,400
Level 3 - 4B5P	2,610 ft ²	150.00 pf ²	391,500
Level 4 - 1B2P	4,038 ft ²	150.00 pf ²	605,700
Level 4 - 1B2P	4,116 ft ²	150.00 pf ²	617,400
Level 4 - 1B2P	2,220 ft ²	150.00 pf ²	333,000
Level 4 - 2B3P	3,336 ft ²	150.00 pf ²	500,400
Level 4 - 2B4P	3,820 ft ²	150.00 pf ²	573,000
Level 4 - 2B4P	5,892 ft ²	150.00 pf ²	883,800
Level 4 - 3B5P	2,342 ft ²	150.00 pf ²	351,300
Level 5 - 1B2P	4,038 ft ²	150.00 pf ²	605,700
Level 5 - 1B2P	4,116 ft ²	150.00 pf ²	617,400
Level 5 - 1B2P	8,880 ft ²	150.00 pf ²	1,332,000
Level 5 - 2B4P	3,820 ft ²	150.00 pf ²	573,000
Level 6 - 1B2P	4,038 ft ²	150.00 pf ²	605,700
Level 6 - 1B2P	4,116 ft ²	150.00 pf ²	617,400

LAMBERT SMITH HAMPTON

Harts Shopping Centre - 40% Affordable Indicative Appraisal Only for Marketing Purposes Not to be Relied Upon

met to be mened open				
Level 6 - 1B2P	8,880 ft ²	150.00 pf ²	1,332,000	
Level 6 - 2B4P	3,820 ft ²	150.00 pf ²	573,000	
Social - 1B2P	26,600 ft ²	150.00 pf ²	3,990,000	
Intermediate - 1B2P	26,068 ft ²	150.00 pf ²	3,910,200	
Social - 2B3P	3,444 ft ²	150.00 pf ²	516,600	
Intermediate - 2B3P	1,722 ft ²	150.00 pf ²	258,300	
Social - 2B4P	25,532 ft ²	150.00 pf ²	3,829,800	
Intermediate - 2B4P	25,532 ft ²	150.00 pf ²	3,829,800	
Social - 3B4P	2,046 ft ²	150.00 pf ²	306,900	
Intermediate - 3B4P	4,092 ft ²	150.00 pf ²	613,800	
Social - 4B5P	4,952 ft ²	150.00 pf ²	742,800	
Intermediate - 4B5P	4,952 ft ²	150.00 pf ²	742,800	
Totals	313,490 ft ²		47,023,500	47,023,500
Contingency		5.00%	2,351,175	
S106		1.00%	282,825	
				2,634,000
PROFESSIONAL FEES				
Professional Fees		10.00%	4,937,468	
Project Manager		2.00%	987,493	
, 0			,	5,924,961
MARKETING & LETTING				
Marketing			150,000	
				150,000
DISPOSAL FEES				
Sales Agent Fee		1.00%	933,583	
Sales Legal Fee		0.50%	466,791	4 400 074
VAT				1,400,374
Total Paid			140,124	
Balance				140,124

FINANCE

Timescale	Duration	Commences
Pre-Construction	6	Jul 2018
Construction	21	Jan 2019
Sale	12	Oct 2020
Total Duration	39	

Debit Rate 6.000%, Credit Rate 0.000% (Nominal)

 Land
 2,110,332

 Construction
 2,715,937

 Other
 370,278

Total Finance Cost 5,196,547

TOTAL COSTS 77,798,558

PROFIT

15,559,714

Performance Measures

 Profit on Cost%
 20.00%

 Profit on GDV%
 16.67%

 Profit on NDV%
 16.67%

 IRR
 15.45%

 Profit Erosion (finance rate 6.000%)
 3 yrs 1 mth

LICENSED COPY

Harts Shopping Centre - Commercial Indicative Appraisal Only for Marketing Purposes Not to be Relied Upon

Summary Appraisal for Phase 1

Currency in £

REVENUE

Rental Area Summary	Units	ft²	Rate ft ²	Initial MRV/Unit	Net Rent at Sale	Initial MRV
Community	1	10,247	12.50	128,088	128,088	128,088
Supermarket & Storage	1	28,761	15.00	431,415	431,415	431,415
Multi Screen Cinema	1	17,879	12.00	214,548	214,548	214,548
Retail 1	1	2,648	17.50	46,340	46,340	46,340
Retail 2	1	2,680	20.00	53,600	53,600	53,600
Retail 3	1	3,165	20.00	63,300	63,300	63,300
Retail 4	1	3,251	17.50	56,893	56,893	56,893
Retail 5	1	4,123	17.50	72,153	72,153	72,153
Retail 6	1	4,198	17.50	73,465	73,465	73,465
Retail 7	1	4,306	15.00	64,590	64,590	64,590
Retail 8	1	4,822	15.00	72,330	72,330	72,330
Retail 9	1	4,822	15.00	72,330	72,330	72,330
Retail 10	<u>1</u>	<u>6,200</u>	20.00	124,000	124,000	124,000
Totals	13	97,102			1,473,051	1,473,051
Investment Valuation Community						
Current Rent	128,088	YP @	6.5000%	15.3846	1,970,577	
Supermarket & Storage	120,000	0	0.000070	10.0010	1,010,011	
Market Rent	431,415	YP @	5.2500%	19.0476	8,217,429	
Multi Screen Cinema	,				-,,	
Market Rent	214,548	YP @	6.0000%	16.6667	3,575,800	
Retail 1						
Market Rent Retail 2	46,340	YP @	6.5000%	15.3846	712,923	
Market Rent	53,600	YP @	6.5000%	15.3846	824,615	
Retail 3 Market Rent Retail 4	63,300	YP @	6.5000%	15.3846	973,846	
Market Rent Retail 5	56,893	YP @	6.5000%	15.3846	875,269	
Market Rent Retail 6	72,153	YP @	6.5000%	15.3846	1,110,038	
Market Rent Retail 7	73,465	YP @	6.5000%	15.3846	1,130,231	
Market Rent Retail 8	64,590	YP @	6.5000%	15.3846	993,692	
Market Rent Retail 9	72,330	YP @	6.5000%	15.3846	1,112,769	
Market Rent Retail 10	72,330	YP @	6.5000%	15.3846	1,112,769	
Market Rent	124,000	YP @	6.5000%	15.3846	1,907,692 24,517,652	
GROSS DEVELOPMENT VALUE				24,517,652		
Purchaser's Costs		6.80%	(1,561,049)	(1,561,049)		
NET DEVELOPMENT VALUE				22,956,603		
NET REALISATION				22,956,603		
OUTLAY						

8,715,447

ACQUISITION COSTS

Residualised Price

LICENSED COPY

Harts Shopping Centre - Commercial Indicative Appraisal Only for Marketing Purposes Not to be Relied Upon

Agent Fee Legal Fee		1.00% 0.80%	87,154 69,724	8,715,447
Legairee		0.0076	09,724	156,878
CONSTRUCTION COSTS	4.0			
Construction	ft ²	Rate ft ²	Cost	
Community	10,247 ft ²	50.00 pf ²	512,350	
Supermarket & Storage	28,761 ft ²	50.00 pf ²	1,438,050	
Multi Screen Cinema	17,879 ft²	85.00 pf ²	1,519,715	
Retail 1	2,648 ft ²	50.00 pf ²	132,400	
Retail 2	2,680 ft ²	50.00 pf ²	134,000	
Retail 3	3,165 ft ²	50.00 pf ²	158,250	
Retail 4	3,251 ft ²	50.00 pf ²	162,550	
Retail 5 Retail 6	4,123 ft ²	50.00 pf ²	206,150	
Retail 7	4,198 ft ² 4,306 ft ²	50.00 pf ² 50.00 pf ²	209,900 215,300	
Retail 8	4,822 ft ²	50.00 pf ²	241,100	
Retail 9	4,822 ft ²	50.00 pf ²	241,100	
Retail 10	6,200 ft ²	50.00 pf ²	310,000	
Totals	97,102 ft ²	σσ.σσ μ.	5,480,865	5,480,865
	,		2, 100,000	-,,
Contingency		5.00%	274,043	274,043
PROFESSIONAL FEES				
Professional Fees		10.00%	575,491	
Project Manager		2.00%	115,098	
				690,589
MARKETING & LETTING			450.000	
Marketing		45.000/	150,000	
Letting Agent Fee		15.00%	220,958	
Letting Legal Fee		5.00%	73,653	444,610
DISPOSAL FEES				,
Sales Agent Fee		1.00%	229,566	
Sales Legal Fee		0.50%	114,783	344,349
RENT FREE COSTS				344,343
Supermarket & Storage	6 mths		215,708	
Multi Screen Cinema	6 mths		107,274	
Retail 1	18 mths		69,510	
Retail 2	18 mths		80,400	
Retail 3	18 mths		94,950	
Retail 4	18 mths		85,339	
Retail 5	18 mths		108,229	
Retail 6	18 mths		110,198	
Retail 7 Retail 8	18 mths 18 mths		96,885 108,495	
Retail 9	18 mths		108,495	
Retail 10	18 mths		186,000	
retain 10	10 111110		100,000	1,371,482
FINANCE	_			
Timescale	Duration	Commences		
Pre-Construction	6	Jul 2018		
Construction	12	Jan 2019		
Letting Sale	18	Jan 2020 Jul 2021		
Total Duration	3 39	Jul 202 I		
Debit Rate 6.000%, Credit Rate 0.000% Land	(INOITIIIIAI)		781,269	
Construction			169,345	
Letting Void			1,533,384	
Total Finance Cost			.,500,504	2,483,999
TOTAL COSTS				19,962,261
				. ,

LICENSED COPY

Harts Shopping Centre - Commercial Indicative Appraisal Only for Marketing Purposes Not to be Relied Upon

PROFIT

2,994,341

Performance Measures

Profit on Cost%	15.00%
Profit on GDV%	12.21%
Profit on NDV%	13.04%
Development Yield% (on Rent)	7.38%
Equivalent Yield% (Nominal)	6.01%
Equivalent Yield% (True)	6.24%
IRR	12.41%
Rent Cover Profit Erosion (finance rate 6.000%)	2 yrs 2 yrs 4 mths



APPENDIX 3:

Hart Centre Floorplan







50 metres

Experian Goad Plan Created: 23/08/2018 Created By: Lambert Smith Hampton







		North
		Contribution of the second of
		REGRETARY REGRET
Key	Vacant Not Vacant	



50 metres

Experian Goad Plan Created: 23/08/2018 Created By: Lambert Smith Hampton



APPENDIX 4:

Regulation 19 Submission to the Hart Local Plan





www.lsh.co.uk

Regulation 19 Objection to the Hart Local Plan Strategy and Sites 2016 to 2032 Proposed Submission Version

On behalf of

The Rural Hart Association

Prepared by
Lambert Smith Hampton
United Kingdom House
180 Oxford Street
London W1D 1NN

Tel: 020 7198 2000 Fax: 020 7198 2001 Date: March 2018



Contents

- 1 Introduction- Who are the RHA
- 2 Context for the Objections
- 3 Planning Policy Framework
- 4 Planning Policy Analysis
- 5 Conclusions

Appendices

- 1 Map of Development sites for Fleet
- 2 Density Evidence relating to Fleet
- 3 Article on CCH and their approach to Development in Fleet
- 4 We Heart Hart article on New School Places



1.0 INTRODUCTION –Who are RHA?

1.1 The Rural Hart Association (RHA) is an association of associations whose aim is to protect the rural assets of Hart and coordinate efforts to resist unnecessary building outside of settlement boundaries. For details of Membership see Part B of the Regulation 19 Response Form



2.0 CONTEXT OF REPRESENTATION

- 1.2 The RHA is concerned that Hart District Council are pursuing a policy in their emerging plan that will unnecessarily jeopardise open land in and around Murrell Green/Winchfield and commit to the creation of a new settlement in this area. RHA recognises the need for the Council to identify and maintain a supply of land for housing to meet the needs for growth in the District, and that the Council need to be robust in identifying that supply of land in order to prevent opportunist development across the district. RHA considers however that a strategy based on focussing development within existing urban areas in the district rather than focussing on a new settlement would be more sustainable, more effective in meeting housing need and importantly more effective in regenerating Fleet as a town where the absence of investment and development has led to the town's stagnation and a decline in the fortunes of this important town centre.
- 1.3 This representation will address these issues through a review of national planning policy as set out in the National Planning Policy Framework (NPPF) and the recent draft NPPF currently published for consultation.
- 1.4 This representation will also demonstrate that a mixed use retail and residential regeneration of Fleet town centre is both desirable and achievable.
- 1.5 This document will demonstrate how the Council have over-stated the need for housing in the district to the extent that the designation for a new settlement in the Winchfield/Murrell Green area is unnecessary. It will also show how significant capacity remains in Fleet to meet much of the housing need and in so doing will lead to the regeneration of the declining town centre. It will highlight flaws in the Council's approach to development and focus on the Council's strategy to divert development away from existing centres for political reasons rather than sound planning judgements, in conflict with national planning policy. We will highlight a policy approach where negative barriers to development are inappropriately used to prevent housing development based on dogma rather than planning need.



2.0 POLICY CONTEXT

National Planning Policy Framework (NPPF):

- 2.1 The National Planning Policy Framework (NPPF) was published and adopted on 27 March 2012 and National Planning Practice Guidance (NPPG) is a material consideration. The overarching theme running through the NPPF is securing sustainable development.
- 2.2 Paragraph 17 of the NPPF sets out 12 Core Planning Principles which are to underpin planmaking and decision-taking in planning. These are as follows; to be plan led; seeking ways to enhance and improve places, to support economic development; secure high quality design and good standard of amenity; to take account of the different roles and characters of different areas; to support the transition to a low carbon future; taking account of flood risk; encouraging re- use of existing resources and renewable resources; conserving and enhancing the natural environment and reducing pollution; to encourage the re-use of brownfield land; promoting mixed-use developments; conserving heritage assets; to manage patterns of growth, making the fullest use of public transport, walking and cycling; to support local strategies to improve health, social and cultural wellbeing, and deliver sufficient community and cultural facilities to meet local needs.
- 2.3 Paragraph 14 of the NPPF requires that there should be a presumption in favour of sustainable development. Paragraph 17 of the NPPF encourages the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. This is in preference to the development of greenfield or previously undeveloped sites.
- 2.4 Paragraphs 18 22 of the NPPF relate to the promotion of economic development. In terms of delivering sustainable development, Paragraph 19 states that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the planning system.
- 2.5 Paragraph 24 states that Local Planning Authorities (LPA) should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.
- 2.6 Paragraphs 150 157 of the NPPF refer to plan making whereby Local Plans must be prepared with the objective of contributing to the achievement of sustainable development, and should be consistent with the principles and policies of the Framework, including the presumption in favour of sustainable development (para 151).



- 2.7 Paragraph 154 states that Local Plans should be aspirational but realistic and should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development.
- 2.8 Paragraphs 158 177 of the NPPF refer to using a proportionate evidence base. Paragraph 158 states that each LPA should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area, and should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and take full account of relevant market and economic signals.
- 2.9 Paragraph 159 states that LPAs should have a clear understanding of housing needs in their area and should prepare a SHMA to assess their full housing needs, identifying the scale and mix of housing and range of tenures that the local population is likely to need over the plan period which:- meet household and population projections, taking account of migration and demographic change; address the need for all types of housing; and cater for housing demand and the scale of housing supply necessary to meet this demand. LPAs should prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. The Government have also produced a standard method for assessing housing need trailed in the "Planning for the Right Homes in the Right Places" document from September 2017 and reinforced in the draft NPPF from March 2018.
- 2.10 In terms of business, paragraph 160 states that LPAs should have a clear understanding of business needs within the economic markets operating in and across their area. To do this LPAs should work with county and neighbouring authorities to prepare and maintain a robust evidence base to understand existing needs and likely changes in the market, and work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability. It goes on to state at paragraph 161 that LPAs should use this evidence base to assess the role and function of town centres and the relationship between them, including any trends in the performance of centres; and the capacity of existing centres to accommodate new town centre development.

Draft Revised National Planning Policy Framework (DRNPPF):

- 2.11 The Government has now published a new draft of the NPPF, the national framework for planning. This is a key document signalling the direction of planning policy across the UK. Consultation on the DRNPPF runs up to 10 May 2018 and the intention is to adopt the policy document as amended in June 2018.
- 2.12 Chapter 7 of the DRNPPF seeks to ensure the vitality of town centres and states that planning policies should: a) define a network and hierarchy of town centres and promote their long-term vitality and viability by allowing them to grow and change in a way that supports a diverse retail offer, provides customer choice, allows a suitable mix of uses (including housing) and reflects their distinctive characters; c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones; d) allocate a range of suitable sites in town centres to meet the scale and type of development needed, looking at



least ten years ahead; e) allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre, where suitable and viable town centre sites are not available; f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites; and g) support diversification and changes of use where town centres are in decline, as part of a clear strategy for their future, while avoiding the unnecessary loss of facilities that are important for meeting the community's day-to-day needs (paragraph 86). Paragraph 87 of the DRNPPF states that Local Planning Authorities should apply a sequential test to planning applications for main town centres uses.

- 2.13 Chapter 3 of the DRNPPF refers to plan-making and states at paragraph 26 that Strategic Plans should have a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. They should, as a minimum, plan for and allocate sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be met more appropriately through other mechanisms, such as brownfield registers or local policies).
- 2.14 Paragraph 25 states that the preparation and review of strategic policies should be underpinned by relevant and up-to-date evidence which should be adequate but proportionate, taking account of relevant market signals.
- 2.15 Paragraph 33 states that the preparation and review of local policies should be underpinned by proportionate, relevant and up-to-date evidence, focused tightly on supporting and justifying the policies concerned.
- 2.16 Chapter 5 of the DRNPPF refers to delivering a sufficient supply of homes and sets out at paragraph 61 that: "In determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment, conducted using the standard method in national planning guidance and that this standard methodology should not be deviated from unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals. In establishing this figure, any needs that cannot be met within neighbouring areas should also be taken into account."
- 2.17 Paragraph 68 sets out that strategic planning authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- 2.18 Paragraph 182 of the NPPF refers to examining Local Plans whereby "the Local Plan will be examined by 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. A Local Planning Authority should submit a plan for examination which it considers is "sound" namely 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".

Policies of the Hart District Local Plan Strategy and Sites 2016 to 2032

- 2.19 The themes above drawn from the NPPF are included in the Draft Hart Local Plan at paragraph 11 and I will return to them later in my conclusions. Policy SS3 of the HLPSS 2016-2032 Proposed Submission Version allocates a new settlement at the Murrell Green/Winchfield Area of Search and reads as follows:
 - "Policy SS3 New Settlement at the Murrell Green/Winchfield Area of Search

Permission will be granted for the development of a new settlement to be identified from the area of search identified on the Policies Map following the adoption of a New Settlement Development Plan Document and agreed comprehensive masterplan.

Development proposals will not be permitted which would prejudice the delivery of a new settlement in advance of a robust master planning process.

The development of the new settlement proposals will be based upon the following high-level principles:

- a) Of a scale to support long term development needs beyond 2032 and the provision of key infrastructure and community facilities including a secondary school;
- b) The potential to deliver new homes from the middle of the plan period;
- c) Comprehensively planned in consultation with existing communities and key stakeholders;
- d) Delivery of a sustainable, inclusive and cohesive community promoting self-sufficiency and with high levels of connectivity, minimising separation of communities by existing barriers;
- e) Deliver innovative and forward-thinking solutions and technology to design, transport issues, telecommunications and measures to mitigate and adapt to climate change;



- f) Provision of a mix of housing in accordance with relevant policies in the local plan and most up to date evidence at the time for affordable housing, specialist provision for the elderly and self-build:
- g) Inclusion of measures to avoid and mitigate any adverse impact of the development upon the Thames Basin Heaths Special Protection Area;
- h) Promote health and wellbeing and self-containment by providing the necessary supporting infrastructure including green infrastructure, community facilities, employment, education, retail and health care services;
- i) Providing the most appropriate location within the area of search for key infrastructure, particularly the new secondary school, having regard to maximising ease of accessibility and to catchments;
- *j)* A layout and form of development that avoids coalescence with existing settlements and does not undermine their separate identity; respects the landscape character and conserves and where possible enhances the character, significance and setting of heritage assets;
- k) Provide measures to avoid, mitigate or offset direct and indirect biodiversity impacts across the site, including opportunities for net gains in biodiversity where possible;
- I) Supported by a transport assessment and strategy, together with an infrastructure delivery plan that ensures the necessary supporting infrastructure is delivered in a timely fashion and promotes sustainable transport modes;
- m) Measures to fully address flood risk and drainage issues.

The detailed framework setting the nature, form and boundary of the new community will be set out in a future Development Plan Document and Supplementary Planning Documents where required.

Mechanisms will also be required which ensure that comprehensive master-planning is properly coordinated across site ownership boundaries to ensure that key items of infrastructure are delivered in a consistent and cohesive way regardless of landownership or phasing".

3.20 We consider that the Plan is largely sound with the exception of Policy SS3 and related points and that the Hart Local Plan can stand without this allocation. We believe the underlying strategy should be refocussed to provide housing in the urban areas and on brownfield sites in line with the NPPF and that the benefits of this in respect of the regeneration of Fleet town centre should be identified in the plan. We therefore



request that Policy SS3 and all references to the proposed new settlement at Murrell Green/Winchfield be removed and Policy SS1 updated to reflect this.



3.0 PLANNING ANALYSIS

Why it is wrong to allocate the new settlement site now.

- 4.1 The NPPF and the new draft NPPF both ask authorities to plan positively for new development and that is now a given in plan development. The Hart draft plan identifies sufficient housing to meet its five-year housing land supply requirement and indeed sufficient additional capacity to provide for housing need throughout the plan period, acknowledging that this can be achieved without the draft allocation of a new settlement. The new settlement at Murrell Green/Winchfield is identified in the plan itself as unnecessary to satisfy housing demand to the end of the plan period but is included to allow flexibility going forward. Such a policy does the exact reverse.
- 4.2 Allocation of the site now pre-empts the identification of the need for housing growth in the district in the future. The assumption made considers that housing need will continue at current and historic levels but this ignores the fact that housing/population need is a volatile factor and changes swiftly. Planning for a continuation of current trends and needs beyond a fifteen-year horizon is fraught with pitfalls and dangers. Simply assuming any need at all could be a mistake. The UK leaving the European Union will have completely unforeseen effects upon population growth in the long term and will significantly affect migration in ways we do not yet understand. This is just one of many factors that will impact on population and housing need, will affect the location of growth in the UK and will alter our economic forecasts and future to an extent that will inevitably affect housing need. Predicting beyond very short time horizons now without understanding these sign-posted changes cannot be done with any degree of accuracy.
- 4.3 What this designation will encourage is the optioning up of the land subject to the designation and in its vicinity by housing developers to an extent more than any other area of land in this or neighbouring districts. This piece of land will then be the subject of significant speculation throughout the plan period as developers seek to realise the forward planned numbers early or seek to bring forward this green field site ahead of brownfield land that will be more difficult and less profitable to develop. The Council will have given tacit approval for a new settlement without the need having been properly established and will have created a housing market expectation of housing numbers in this area that will set the tone for any negotiations in the future. This situation gets worse however. The Council advocate beginning development of the new settlement site in the mid plan period, this would be, in advance of any review of planning policy, population and housing numbers (programmed for 2023). Indeed the planning policy for a new settlement, that even in the view of the Council is not yet needed, does not contain any suggestion that a need should be established before the development commences. This can be contrasted with the policy NBE1 on Developments in the Countryside which states that:

"Development proposals within the Countryside (defined as the area outside settlement boundaries) will only be supported where they are:



- a) Meeting the proven essential need for a rural worker to live permanently at or near their place of work; or..."
- 4.4 It seems that the test for small scale development outside existing settlements is dependent upon proof of need whereas the wholesale allocation of a new settlement can be made without any real effort to demonstrate a need for it.
- 4.5 The Council themselves identify that development of the new settlement should begin in the mid-plan period (2022-2024). This gives the lie to the Council's identified requirement for a new settlement based on housing demand beyond 2032. At this stage the Council have a current housing land supply to satisfy projected need without the new settlement. The settlement therefore should certainly not be started in advance of the identified need or indeed other brownfield sites in the development plan intended to meet the need prior to the end of the current plan. Otherwise any housing built will be in addition to the identified supply and interestingly housing built before the end of this plan period and in excess of housing targets will not go toward meeting a need beyond the plan period. Perhaps a third new settlement would be the Council's response?
- As worded no new forecasts based on a post Brexit population and economic projections will therefore be required prior to the start on site for the new settlement. No account will be taken of falling fertility /childbirth rates and household formation rates, no heed given to a potential declining population. Indeed, housing here will be brought forward not only before a need for it has been established but before other sites across the district, presumably including many Brownfield sites, have been brought forward. The Government's advice in the NPPF and a long-established policy convention is that brownfield development land should be used up before greenfield sites are brought forward. The phasing of the new settlement imagined in SS3 (b) during the mid-plan period will substantially undermine this convention.
- 4.7 Setting aside the inappropriate phasing of the new settlement and whilst the Council's intention is laudable in creating a solid housing land supply that is not subject to challenge by developers at appeal going forward, simply having an up to date and adopted Local Plan with a sufficiency of land identified for housing is enough to prevent and protect other green field sites from inappropriate development. The unnecessary allocation of this site means that it becomes a hostage to fortune as a de facto part of the future housing land supply whether needed or not.
- 4.8 At some point, potentially after several changes in Government, but importantly before the expiry of this development plan, the development industry may place even greater emphasis on brown field ahead of green field or on changing the spatial allocation of land on a more regional basis. As a result, housing numbers could be revised further downward, or pushed harder to areas closer to conurbations or with better existing infrastructure and facilities such as work-places, schools, leisure facilities, highways infrastructure, health care facilities or other community resources all lacking in the Winchfield area. If the Council pre-judge both the level of demand and the nature of land required now for the land supply 15 years hence then they will be planning for a future that has not yet come about and a need that has not been



tested. Predictions in demographics, energy planning, transportation planning over such time periods are wholly unrealistic and yet this council is seeking to jump the gun and predict requirements now that cannot be foreseen and doing it in a way that will ensure that development in this location, on green-field land starts before a need for it can be shown and becomes the focus of very significant pressure from the housebuilding industry.

Why there is no need for this allocation.

- 4.9 The NPPF and Government policy guidance requires that Councils in preparing their development plans promote sufficient land to meet a five-year housing land supply and that local plans identify how the need for housing will be met for the duration of the plan period, in the case of Hart to 2032. The Government has also published a methodology that identifies how the supply numbers are to be calculated using a standard methodology. The housing land supply for Hart using the standard methodology is a total of 292 properties per year from 2016 to 2032 or a total of 4672 homes. This includes a 40% cap on the growth in total numbers above projected household growth for the period in line with the Government's advice on methodology. Hart therefore could set a housing target of 4672 homes or 292 units per year.
- 4.10 This would be a defensible number and sufficient to give the Council comfort at any planning inquiry into residential developments on unallocated sites. The Government methodology takes into account projected population increases, trends in household formation, demand for housing locally and house prices. In many Districts where the standard method was introduced, housing numbers were projected to increase. In Hart the application of the standard approach led to a decrease in the number of homes required. Appendix 2 to the draft plan sets out the Council's approach to housing numbers.
- 4.11 The document argues that the 40% cap on projected household growth may not be upheld and have set it aside. Removing the cap leads to an annual supply requirement of 310 units per year or a total of 4960 housing units. This would give a robust figure, above the supply required using the Governments recent, up to date and unchallenged methodology. Such a move could have been justified up until the publication of the revised NPPF. But the revised NPPF retains the 40% cap and it is unlikely now to be challenged or removed. The 310 units per year number therefore exceeds the supply required under the standard methodology. Hart have gone further however. In another adjustment to the standard methodology the Council have added a 25% uplift taking the requirement to 388 homes per year or a total of 6208 homes for the plan period. The Council claim that this 25% uplift is to allow a contingency should the methodology change. The methodology was only set out by Government in 2017. Is up to date and well supported. It will not change before the Inquiry into the Local Plan is heard later in 2018. The footnotes allude to a vague potential increase in housing numbers nationally of 13% that was not followed up in the publication of the NPPF draft and supporting documents. In any case a notional 13% uplift cannot justify the 25% applied by the Council.



- 4.12 A second contingency allowing for changes to the inputs in terms of housing costs and projections is also included. The Council cannot anticipate these ahead of time and over the short time frame to the examination in public the caution is transparently unnecessary.
- 4.13 The Council in a third bullet point to appendix 2 claim the need for some degree of flexibility for non-delivery or delayed delivery dates. Such an approach is mooted in the NPPF which suggests an allowance of 5% of the total in normal circumstances or up to 20% where persistent under-delivery is recorded. Hart have not under-delivered to date and have an identifiable supply to 2032 well beyond the 5-year requirement. Such a contingency again cannot justify the 25% uplift.
- 4.14 In the fourth bullet point the Council claim the benefits of boosting housing delivery including the supply of affordable housing. On the face of it this is a legitimate concern but, where it is conflated with development of greenfield land the loss of such land needs to be weighed in the balance. If the sites identified as a result of the over-cautious approach of the Council were brownfield, then I think we could agree that the benefits of boosting housing supply would be positive but in this case and in this District, where the identified need is already met, those benefits need to be considered against the clear harm caused by the incursion of development into the countryside and the loss of green field sites.
- 4.15 Finally the Council identify that the housing numbers have been increased because they already have a significant supply of housing identified through the Hartland Village allocation and existing consents. This position does not justify building additional housing, beyond identified need, especially on green field sites.
- 4.16 In summary the housing numbers simply do not add up. The Council have been tasked with providing 292 units per year through the standard methodology. Setting aside common safeguards and the policies of the NPPF they have identified a supply of 388 units per year or a total of 6208 homes to 2032, an increase above what is required of 32% or 1362 units, close to the total for another new settlement.
- 4.17 It doesn't end here however. If one continues interrogating appendix 2 one can see other elements of gerrymandering with the figures. Within Hart some 327 residential units have been planned through the application of permitted development rights to change the use of offices. The Council is using the SANG restriction to prevent these units from coming forward, by refusing to release SANG land to match that required to support these new units. The Council is effectively thwarting the application of Government Policy in terms of freeing up under-utilised employment land and reusing brownfield land and at the same time reducing the housing land supply. These units if properly accounted for would bring the oversupply against the standard methodology to 1689 units. More than the allocation of land at Hartland Park or indeed the notional capacity of the new settlement at Murrell Green/Winchfield.
- 4.18 One final addition to the supply side can also be made. The Council's numbers according to their assessment of sites available and allocated up to 2032 will permit the construction of 6346 houses, an additional 138 ahead of the notional requirement



identified in appendix 2 giving a grand total oversupply of 1827 or 39% ahead of the required number from the standard methodology.

- 4.19 The Government is clear that Councils can "put forward proposals that lead to a local housing need above that given by our (DCLG) proposed approach". The need for the additional housing however, rather than coming as a result of hedging the numbers game should be promoted as a part of coherent strategy linked to the delivery of an infrastructure project or increased employment ambition. No clear case for overdelivering on housing numbers is given in the draft Hart Plan and at no time have the Council consulted their residents on over-delivering. Quite the contrary, all consultations with the public have been based on the need to deliver particular numbers, beyond the requirement, and the consultation has been about how these numbers can be met- not whether they should be in the plan at all.
- 4.20 We must then relate the above to the allocation for a new settlement at Murrell Green / Winchfield. There is none. There is no connection. The Council concede at footnote 7 below policy SS1 that the new settlement at Winchfield/Murrell Green is not required to meet the housing needs identified in this plan. Clearly not. If the Council stuck to the standard methodology they have sufficient housing identified for this plan period and indeed the first 6 years (to 2038) of the next one (assuming that need, demand, and population growth hold up at current levels which is a moot point in any event).

Why An Allocation at Winchfield/Murrell Green is the Wrong Solution

- 4.21 Hart is a small district in Hampshire with few large conurbations or urban areas. The main centre and town in the district is Fleet, a settlement of 38,000 population sitting to the north-east of the district and close to the similar-sized towns of Aldershot, Farnborough, Farnham and Camberley. Fleet as a town is developed to a remarkably low density. Very few buildings are more than two storeys and the town centre is long and linear with many sites divided between commercial development and surface car parking. Residential properties tend to be fairly large and no more than two storeys comprising many detached and semi-detached houses. New housing tends to be of a similar form. The draft plan acknowledges the low density nature of Hart's settlements and the historic propensity for green field development at paragraph 41.
- 4.22 The Council actively discourage higher density development, and this has limited the scope for housing development particularly on windfall sites. Policies designed to prevent increasing densities are couched in terms of resisting back-land development, preventing garden development or maintaining the existing spatial character of an area.
- 4.23 Further policies prevent the change of use of brownfield sites to housing on a pretext of needs for employment uses, retail and town centre uses and offices. All such polices deliberately constrain the redevelopment of existing residential sites, limit the scope for development within the urban area and stifle land values maintaining the



lowest density of development for a town of this size anywhere in the UK (Fleet* See appendix 2).

- 4.24 These policies are formulated not simply for planning ends but are politically-motivated. They reduce the pressure on sites in the existing urban areas protecting existing residents to a degree that goes beyond normal planning considerations and creates a necessity for green field development. This green field development is then promoted in parts of the District where there are fewer residents and indeed fewer elected Councillors and fewer voters. An article by the leader of the CCH group on the Council neatly identifies their ethos and approach (appendix 3). In this way Hart takes the pressure for new housing away from the existing residents and seeks to meet it in unsustainable green field locations.
- 4.25 The NPPF is clear however, brownfield should come before green field, urban development should come before development in the countryside and developments should be located in sustainable locations that benefit from existing infrastructure. The principal argument of the RHA is that the Council is seeking to satisfy the identified housing need in the district (and indeed for more) in a way that is incompatible with the NPPF and good town planning; that ignores the opportunity for more and greater levels of development within existing urban areas; and development that will simply create demand for duplicate public, social, health, transportation, employment and education facilities in a location currently bereft of them. This is done in order to sidestep the need to increase urban densities in Fleet itself. Planning is not supposed to be a political activity but one done objectively and in line with a set of rules laid out in Government policy. That is not the case in respect of this allocation.
- 4.26 The emerging local plan is almost silent on Fleet town centre. The most important centre in the district warrants only six paragraphs (242-247) reflecting the political view that the town is full, unable to compete and offers no development opportunities. It is identified in the retail hierarchy as the main centre in the district, the most important for employment, retailing, service provision and entertainment provision. There is a short review of its function, no assessment of its health and no promotion of a strategy or plan for its development, regeneration or enhancement. Paragraph 243 suggests that the policy to regenerate the centre encompassed in the plan amounts to no more than:

"Support to improve the range and quality of shopping and leisure facilities within Fleet town centre will enable it to compete more effectively with surrounding towns"

4.27 A vague reference at paragraph 247 suggests a DPD on the primary shopping area. Worse still the paragraph on the retail hierarchy at 236 surrenders Fleet to a bleak future as "a centre that cannot compete with surrounding towns" (albeit that all are of similar size). The lack of ambition for Fleet is telling and shocking in equal measure. Our own assessment of its health suggests a centre in some degree of decline, moving from a second tier centre into the third tier and possibly beyond. Whilst vacancies are light they still fall ahead of the national average and whilst occupancy levels have been maintained over time, the quality of representation has declined significantly. Fleet needs regeneration and the plan, despite including site allocations, finds none in the town centre and does nothing to address the centre's decline. In this regard the plan is incomplete. This reflects in part the political will



identified in paragraph 4.25 above. It appears easier to do nothing or resignedly accept the centre's growing irrelevance to the wider hierarchy. This approach ignores Fleet's great potential and provides the second plank to our concerns over the allocation of a new settlement at Murrell Green/Winchfield.

- 4.28 It is our contention that the Council have not looked at Fleet as a potential resource. They have not reviewed the availability of brownfield land in the town or thought through a strategy of how the centre can be enhanced and how investment can be brought back to Fleet. The Council have not considered how regeneration could address not only the viability of the centre but also the perceived shortfall in brownfield land to the extent that Hart feel it appropriate to make large green field allocations to meet their housing need.
- 4.29 The principal driver of investment in Hart District is residential development. This supports some of the highest property prices in the UK and makes Hart a desirable location for residential developers of every stripe. This inevitably has led to pressure for redevelopment in the urban area and in the surrounding green fields. The Council's response has been to shut down the avenues for development within the urban area and to resist the residential use of other land uses. Mixed use development is not mentioned in the plan in relation to Fleet town centre (or indeed anywhere else) and yet we have two issues; a supposed shortfall of brownfield land for housing such that the Council consider it necessary to allocate a new settlement in the countryside to accommodate 1500 houses and a declining town centre that cannot compete (in the view of the Council) with neighbouring towns. And yet this is a centre that has plentiful opportunities for redevelopment.
- 4.30 The pragmatic solution to both of these problems is to support mixed use redevelopment in and around Fleet town centre, to support the change of use of moribund office space into residential units, and to use the demand for housing as a lever to secure investment in the town bringing with it growth and regeneration to revitalise the existing retail core and revive flagging businesses and the evening economy.
- 4.31 Lambert Smith Hampton have reviewed Fleet town centre carefully and identified a range of sites that could come forward for mixed use redevelopment. We have identified a range of opportunities (see plan at appendix 1) and applied a density range for development (based on existing schemes in the centre) to test how many residential units could be delivered through the redevelopment of these sites. This exercise is embryonic in scope but has identified the potential for nearly 1000 units in the town centre area alone. This is more than half of the requirement intended to be met at Murrell Green/Winchfield. The table below identifies the sites, the density for development and the units that can be created. The majority of these sites include retail uses or car parking at ground floor with flats, maisonettes or town-houses above.

Ref Number	Site	Potential Units	Comments	Running Total
1	140-150 Fleet	150	3-4 storeys.	150
	Road, Fleet		Currently car	
			parking will need	
			re-provision.	
2	Hart Shopping	600	6/7 Storeys,	750
	Centre		retail at ground,	
			parking	
			basement,	
			residential over.	
3	Victoria Road	58	3-4 Storeys, Car	808
	Car Park		parking	
			underneath	
4		55	3 Storeys	863
5	Travis Perkins	55	3 storeys	918
6	Corner Albert	12	3 storey.	930
	Street and Fleet		Identified in	
	Road		SCHLAA	
7	Admiral House	20	3 storey, site	950
			identified in	
			SCHLAA	
8	Lismoyne Hotel	40	3 storey, site	990
			identified in	
			SCHLAA	

4.32 The sites identified include the existing Hart Centre, existing office spaces and some alternative uses. In each case existing uses could be replaced on site alongside new housing simply through increasing residential/development densities or reworking layouts and existing development. The largest site is the Hart Centre and the Council need to consider the future of this asset properly. It currently anchors the town centre and the Waitrose represents the town's main food outlet. But it sits in a centre that is visibly declining. Multiple retailers are retreating and being replaced with poorly covenanted alternatives if not lying empty. Much of the space is difficult to let and the centre is losing its attraction. With fewer retailers the centre attracts fewer visitors and this is the start of a spiral of decline. With fewer traders and less revenue from the car park the service charges for units



will continue to rise, again dissuading new occupiers and leading to more vacancies. Ultimately Waitrose will withdraw and the centre will fail without a serious intervention.

- 4.33 Waitrose would seek to remain in the centre and the re-provision of a new store of an appropriate size to meet their current needs would be welcomed by the retailer who would wish to retain a significant presence in the town. Similarly Sainsbury would sensibly participate in reworking their presence in Fleet to realise more from their existing land asset. All of the major food retailers in the UK are currently working on getting more from their existing estate rather than developing new stores. Their estates strategies recognise that many of their sites are underutilised and can generate returns from development whilst also delivering more modern stores. Fleet is a prime example of where the existing retail spaces and car parks can be reworked to deliver more.
- 4.34 The LSH national retail agency team have been asked to consider Fleet as a shopping centre and to comment on future retail investment here. I set out their comments below:

"From a retail perspective Fleet town centre offers localised retail facilities. The primary area of Fleet Road is reasonably robust but the Hart Shopping Centre which was opened in 1989 is looking dated. It has large basement areas no longer required by modern retailers and has reportedly a high service charge level. There are currently ten retail units as listed as being available on the Co Star database (which is high) and the former Woolworths store in the scheme was vacant for a number of years before being leased in 2017 to M&Co.

Basingstoke to the west and Guildford to the east are strong regional shopping centres which attract comparison consumers from the immediate Fleet catchment via the quick linkages to the M3. To the north east The Lexicon Shopping Centre, Bracknell has now opened offering modern retail facilities with anchor stores including Fenwicks, M&S, Primark, Next and H&M along with a 1,300 space multi storey car park. The Bracknell Regeneration Partnership has reportedly invested circa £240m into the town centre creating an extremely attractive retail environment.

Another major retail and leisure scheme within the region is the recently announced £200m redevelopment of Basingstoke Leisure Park by the Council and New River Retail which is to include state of the art leisure facilities and a designer shopping village.

As has been widely reported the growth of online retail sales is having a major impact on the retail landscape – online sales are currently circa 16% of all UK sales and growing annually. There is a fundamental structural change in our shopping habits which in turn is having a major impact on retailers and town centres. The retail centres that are thriving tend to be those regional locations offering a high quality experiential mix of retail and leisure or the smaller centres that are able to provide easily accessed, convenience retail facilities in an aesthetically pleasing environment.

Interestingly, we have started to witness retail assets (shopping centres and retail parks) particularly in the South East being acquired or redeveloped for their



residential potential. In some instances, we are seeing retail being proposed above shopping centres and in other instances the complete redevelopment for residential – examples include Forbury Park in Reading which has consent for 765 homes and Whitley's Shopping Centre in Bayswater which is to be redeveloped for a mixed retail and residential scheme. This trend is likely to continue especially in areas where residential values are high and the retail assets are stagnating.

The Hart Shopping Centre could offer such potential in the future – retaining strong convenience retail facilities at ground floor level with retailers such as Waitrose but with residential accommodation on the upper parts.

What is clear, is that on a national basis we have too many shops and alternative uses, in particular residential, is a desirable way of regenerating our town centres".

Sean Prigmore, Retail Director, Lambert Smith Hampton

- 4.35 This advice should be contrasted with the advice in paragraph 66 of the plan which identifies that comparison retailing will "be the driver of growth" in Fleet.
- 4.36 In discussion with our retail experts we have identified a potential redevelopment of the centre as the only realistic option to avoid further decline. Driven by the buoyant house prices in Hart a redevelopment of the centre to provide a mixed use scheme with houses and flats above retail and car parking at ground and first floor can provide a viable alternative. Introduction of a small boutique cinema (3 screens) and some additional restaurant/ food and beverage units to support the cinema could complete the scheme and lead to a major re-ordering and restructuring of the town centre. The additional residents, their spending, and the impact of an investment on this scale in Fleet will encourage other sites around the town centre to come forward. Developments such as this however cannot come forward in a policy vacuum. The Council need to create the positive framework for investment and development that will encourage and re-energise land-owners in Fleet to step up and invest to halt the decline the centre has seen. This is the reverse of the Council's defeatist approach currently set out in the local plan which fails to recognise the potential and misses the opportunity to harness the value of the residential market in the area to regenerate the town centre.
- 4.37 In addition to the redevelopment of retail facilities in the town, the approach also considers the reuse or redevelopment of employment and office sites within the town centre. Our review of the local office markets led from our local office in Guildford suggests that the local office market is moribund. I set out below the advice from our Guildford head of office regarding offices in Fleet:

"I have been actively involved in the Fleet office market for more than 30 years. My activity has included; the 60,000 sq ft, three building Fleetwood Park, Ancells Business Park (ABP) for MEPC and subsequent owners/occupiers; the sale of the



25,000 sq ft Automation House (ABP) for Festo; the lettings of 16,000 sq ft Beech House and the 16,000 sq ft Cedar House (both ABP) on a number of occasions; and the 24,000 sq ft Linea (ABP) for Kingsbridge Estates. LSH is currently marketing office space in Beech house and Linea.

The office market in Fleet has been in decline for a number of years as larger corporates have vacated to consolidate occupation in larger centers and locations benefitting from more amenity – such as Farnborough Business Park. Key business centres such as Reading and Basingstoke have prospered whilst the smaller satellite office location such as Fleet are finding it harder to prove their relevance as office locations. Sun Park, 285,000 sq ft of offices on a campus site has now been vacant for many years and what is now called M3 HQ. 70,000 sq ft on ABP is suffering the same fate – neither are likely to be occupied as offices again. There is the potential to enable redevelopment of larger unwanted office stock for residential and to focus B1 provision in locations better served by public transport and amenity and in buildings which will allow business space for the SME sector where what demand there is lies."

Paul Dowson, director of LSH.

- 4.38 This advice should also be considered when reviewing the Council's decision to discount the permissions granted under prior notifications for change of use from office to residential. Some 327 units across Hart are being thwarted by the Council's refusal to release SANG land to support these developments. These developments have come forward as a result of a Government initiative to ensure the re-use of redundant and empty office stock in line with the underlying principal of making the best use of urban brownfield land. It is clear that the office market in Fleet has declined and that the units created in this way can contribute toward the provision of housing. The Council's approach however would rather see these buildings remain empty and the potential for houses delivered on green field sites.
- 4.39 In summary, the potential exists in Fleet town centre to deliver nearly 1000 new homes from redeveloping brownfield sites. Promoting such a strategy negates the need for a new settlement in the future and will also deliver the investment needed and the positive development environment necessary to achieve the regeneration of the town centre. Regeneration does not work where it tries to recreate opportunities in an area that the market has rejected. The office and retail markets for Fleet are not going to come back. The strongest development market in the town is for residential and this can be used as the engine for change and regeneration. The Council recognize at paragraph 40 of the draft plan that property values are very high. The pent-up demand and exceptional residential values can be harnessed to deliver the required regeneration. The Hart District Plan should recognize this and create a positive environment for investment in the centre to deliver the housing and satisfy the need for regeneration. Hart's draft Local Plan, by being defeatist about Fleet, by blocking SANG provision for office to residential conversions and by the advocacy of an unnecessary new settlement is doing everything possible to prevent Fleet from becoming a commercially successful and vibrant town.



Is School/Education infrastructure driving the new settlement?

- 4.40 Hart District Council appear fixated on delivering a new school through the development of the proposed new settlement. At paragraph 21 of the document Hart acknowledge that the plan as proposed should be in accord with Hampshire County Council's plans and strategies. At paragraph 77 it is suggested that Hart work closely with HCC in relation to planning for and providing new schools. Paragraphs 74 to 77 of the plan discuss schools provision in the district. It is not stated here that a new school is required. HCC are responsible for schools provision and planning. Hampshire County Council have consistently commented that a new secondary school is not required. (See appendix 4).
- 4.41 A new secondary school for Hart is mentioned in the draft planning policy document both as part of the vision (paragraphs 93 points 3 and 7) and in the objectives (paragraph 94 objectives 3 and 8) always in connection with the new settlement. The size of the new settlement has been framed to ensure that it can deliver the numbers of pupils and the funding support to provide a new school (paras 104 and 147). The phasing of the new settlement, with development allowed to start in the mid-plan period (despite the housing not being required) is also set up to deliver the new school early (paragraph 147). It appears that the new secondary school desired by Hart but not by HCC is driving both the size of the new settlement and the phasing of its development. One may also infer that the need for a new school is fundamental to the selection of the location.



5.0 CONCLUSIONS

- 5.1 In the context set out above, we conclude that the plan could be made sound with the removal of Policy SS3 which allocates a new settlement at the Murrell Green/Winchfield Area of Search. The creation of a new settlement at Murrell Green/Winchfield, is considered premature in terms of housing numbers, inappropriate in terms of need and the sequential approach that must favour brownfield ahead of green field development and unnecessary in terms of the availability of sites elsewhere on which additional housing need can be met. The Plan should better focus on the regeneration of Fleet Town Centre within which there are significant opportunities for redevelopment to provide the housing numbers that render the need for a new settlement elsewhere obsolete.
- The plan itself sets out the tests for the soundness of a policy document at paragraph 11 and asks a number of questions of the plan and its preparation. In answer to the first bullet point, has the Council followed the correct procedure, our answer would be no. The Council have failed to properly consult on the draft plan by posing the wrong questions. The Council have consistently sought to satisfy a housing demand far greater than the actual need identified by application of the standard methodology and whilst this methodology changed only late last year (2017) it has crystallised what new housing is required. The Council have aimed far higher than this (39% beyond the appropriate numbers) but the Council's consultation has only been upon the basis that the higher number of houses is the actual requirement. The consultation then focused on where to locate the exaggerated housing need either through provision of a new settlement or on urban extensions onto greenfield land. By the Council's own assessment the new settlement is not required in the current plan period. If appropriate numbers of housing are used as generated by the standard model, then the new settlement would not be needed until 2038 if at all.
- 5.3 The next questions deal with the test of soundness and here four questions are asked:
 - i) Has the plan been positively prepared?
 - to which we would answer yes.
 - ii) Is the plan justified?

The answer here has to be no. The new settlement cannot be justified and is not required in the current plan period. The plan has failed to properly consider the opportunity presented by brownfield mixed use development to meet housing need in Fleet; the infrastructure required in the plan (a new secondary school) is not supported by HCC, the relevant authority on school provision; the phasing of development of a new settlement to begin in the mid plan period cannot be supported.

iii) Is the plan Effective?



To which our answer would be that it is practical and can deliver on joint working with neighbouring authorities.

iv) Is the plan consistent with national policies?

Again the answer here has to be no. The Council have failed in their duty to identify and prioritise the development of brownfield land and have directed development to green field sites without any proper audit of brownfield opportunities. LSH have identified the potential for up to 1000 units in Fleet town centre and have yet to review capacity in other urban centres.

The Council have also failed to pursue or identify a strategy for the regeneration of Fleet town centre contrary to the advice of the NPPF at delivering plans that aim to support the vitality and viability of existing urban centres.

- 5.4 We consider that the Hart Local Plan can stand without the new settlement allocation and therefore request that Policy SS3 be removed and Policy SS1 updated to reflect this.
- 5.5 We would be grateful if you could acknowledge receipt of this representation and we reserve the right to supplement these comments at a later date.
- This evidence has been completed by Mark Dodds BA (hons) BTP National Head of Division, Planning and Development Consultancy at Lambert Smith Hampton.