

KEITH TAYLOR
Green Party
for the South East of England



Head of Planning Management
Winchester City Council
Colebrook Street
Winchester
SO23 9LJ

10th June 2010

Dear Sir or Madam

**Barton Farm Planning Application
09/02412/OUT (original) and 10/01063/OUT (duplicate)**

I am writing to object to this Application, on the following grounds.

1. New emerging policy on housing

Building housing over greenfield sites, such as this one, should only be contemplated as a last resort, when all other options have been exhausted.

The Coalition government has pledged, as a matter of priority, to abolish Regional Spatial Strategies¹ and therefore the South East Plan. The South East Plan requires 654,000 net additional dwellings in the region between 2006 and 2026, giving Winchester District a target of 12,240. Policy WT2 'Strategic Housing Allocation - Barton Farm' of the Core Strategy Preferred Option, May 2009 (page 39), states that:

'Land at Barton Farm, Winchester (to the east of Andover Road and south of Well House Lane as shown on the attached plan) is allocated for the development of 2,000 dwellings together with supporting uses. This allocation will only be released when monitoring shows it is needed to meet the requirements of the South East Plan.'

With the abolition of the South East Plan in prospect, it would be nonsensical to give approval for a major housing development such as this one to fulfill obsolete housing targets.

2. A result of inequality: affordable housing need

It is undisputed that there is a need for more affordable homes in the Winchester District, but permitting large swathes of greenfield agricultural land to be built over is not the answer. There are problems in Winchester of over-crowding in multi-occupancy and substandard properties because people simply cannot afford to rent or buy locally. Exorbitant house prices have also caused one of the highest mismatches between jobs and housing anywhere in the region: jobs in Winchester attract almost 18,000 commuters a day into the town, whilst about 8,600 of the town's residents commute out to work.

The disparity between salaries and house prices occurs throughout the south east region but is at its most extreme in the Winchester District. As the Council's Housing Strategy (2008/9-2012/13)

observes ‘lower quartile house prices [in the District] are 10.5 times lower quartile incomes, making affordability amongst the worst in the South East ... A household income of £50,000 is needed to purchase a lower quartile priced property. With mean household incomes at less than £40,000 this makes such a purchase unaffordable for 74 per cent of households.’

The root of this problem is income inequality and the inflation of house prices. The charity Shelter notes that nationally house prices have tripled between 1997 and 2007, and risen over forty times between 1971 and 2008. The rapid rise in house prices has occurred for a number of reasons, including low interest rates and an increased availability of mortgages because banks relaxed lending criteria, making it easier to borrow higher salary multiples. These economic and fiscal factors are subject to change and can be adjusted; but once built over, a site such as Barton Farm is lost as open space forever.

The previous government’s approach was to require an increase in newbuild housing as a gambit to bring down inflationary prices, and supporters of the Barton Farm development may also take this view. The strategy is doomed to fail, however, because any beneficial effects are relatively short-lived and are outweighed by the destruction of environmental quality, including traffic congestion, pollution, water issues including flooding, overcrowding, and noise. All of these problems are anticipated to a greater or lesser extent if this application is permitted.

3. The need for hard data on housing need

Council data on the extent of need for affordable housing is conflicting. Assessing such need is of course a highly complex expert task, but the assumptions underlying the figures given in the Council’s Strategic Housing department’s consultation response to the Barton Farm application are unclear. The response welcomes the proposed development of Barton Farm as providing ‘a significant contribution towards meeting affordable housing needs’. It then gives a series of hugely differing figures as indications of the District’s affordable housing need:

- 1200 households registered as seeking affordable social rented housing close to the application site
- 2500 households on the City Council’s housing register
- c9000 households on the Choice Based Lettings register [Hampshire Home Choice includes Havant and East Hampshire]
- 440 [rented and intermediate] new dwellings per annum estimated as needed in the Strategic Housing Market Assessment
- Affordable housing development is currently taking place at the rate of 100 units [homes] per year across the District.

These figures do not distinguish between people wanting and needing to live in Winchester, and it is not clear what projections are estimated. In the Council’s Housing Strategy (2008/9-2012/13) no overview is given of population trends in the District over the long term, nor how many homes have been changed from single- to multi-occupancy in that time. No clear analysis is given of the ‘carrying capacity’ of Winchester, ie how many jobs and homes can be sustained by the existing and planned infrastructure.

Provision of new housing at Barton Farm will draw in new populations from elsewhere in the subregion, and therefore local need may not be remediated. Models may assume higher Gross Value Added (an economic measure which can conflict with sustainability) simply with higher populations, and this is not made explicit. Impacts on the existing and proposed new infrastructure are likely to be greater than anticipated.

4. Agricultural land, climate change and food security

It is of particular concern that the development would irreversibly destroy 91 hectares of agricultural land adjacent to Winchester, when local food production will become increasingly necessary in the years ahead. A local food supply chain is important to the District in the light of climate change, and initiatives such as the Farmers' Market and Hampshire Fayre are well supported. Climate change is already causing, and will continue to cause, sudden onset weather shocks including road flooding. The Barton Farm site is a cultivated buffer zone along the northern edge of the City and it is essential to retain it.

5. The alternative: sustainable use of existing resources

It is unsustainable to prioritise building new housing developments such as Barton Farm over bringing empty homes back into use, and maintaining existing housing stock, but unfortunately a number of drivers are ensuring that Winchester City Council is doing just that.

In response to a question from Councillor Sutton on 9th January 2008, the Council stated that it has an Empty Property Strategy, and that long term empty properties are not a significant problem in the District: an estimate of 70 empty for three years or more was given. A recent update (personal communication with a Council Strategic Housing officer on 18th May 2010) indicates that the Council's Empty Property Strategy has since lapsed without renewal, and that most other action on the issue has been discontinued.

It is hard to know exactly how many empty properties there are in the District because they are usually only reported when there is an environmental health concern such as rats. Applications for Council Tax exemptions or discounts give some indication, although this data is likely to be an underestimate. The current number of applications stands at 351 for long term empties (empty for six months or more) and 384 for second homes. There is a complete exemption from Council Tax for empty properties for the first six months and thereafter a 50 per cent discount. There is a 10 per cent discount on Council Tax for some applicants with second homes.

If just half of the empty homes in the District - those currently known to the Council - were to be brought back into use, it would exceed the number of new affordable homes (approximately 100) currently being built, through Housing Associations, by the Council annually. According to the Empty Homes Agency, a considerable portion of the government's house building target for England could be met this way: nationally if half the empty homes were returned to use it would provide 162,000 new homes and obviate the need for building on 4,500 hectares of land. The No Use Empty campaign by Kent County Council and partners has successfully brought back into use over 600 properties so far, of around 6000 identified across Kent.

The WCC Strategic Housing officer described the obstacles to following this example:

- There is a belief in the Council that building new affordable homes is a better use of resources than bringing empty homes back into use;
- Building new affordable homes does not cost the Council anything - because of funding from central government and elsewhere - whereas it does cost substantial amounts, both financially and in staff time, to return the same number of properties to use;
- There is often a state of decay in empty homes which requires expenditure whereas new houses are built to higher housing regulations and energy efficiency standards;
- There can be sensitive issues in attempting to bring an empty property back into use, such as dealing with people who may have been bereaved (if the house belonged to someone now deceased);
- Because the Winchester District is largely rural, empty homes can be in villages a long way from shops and transport systems, and therefore not where people want to live;

- The Council does not have the financial resources to enforce measures such as Empty Property Management Orders.

It is a major concern that the Council is in this position and is therefore under such pressure to permit a 2000-home development at Barton Farm. The inevitable longterm dual results are over-provision and premature obsolescence of existing sound housing stock.

Even more shockingly, despite the Council's pledges to reduce their carbon emissions by 20 per cent by 2012, according to this same Strategic Housing officer, 'retro-fitting' of Council housing to upgrade it to new required standards of insulation and energy efficiency, to combat climate change, has neither begun nor been piloted in Council stock anywhere in the District.

In the European Commission's new Communication on the 'Europe 2020 Strategy'², to be formally adopted this month, there is a commitment to reduce greenhouse gas emissions by 20 per cent by 2020 compared to 1990 levels (30 per cent if other industrialised countries make comparable efforts); to increase the share of renewables in final energy consumption to 20 per cent; and to move towards a 20 per cent increase in energy efficiency. In the Winchester District Strategic Partnership Climate Change Programme there is a target, CCPROG/003/002, for a comprehensive home insulation strategy for the District. Target CCPROG/003/001 also seeks to achieve widespread improvements in home insulation across the District.

I urge the Council to reject this application and to give urgent consideration to the points raised above.

Yours sincerely,

A handwritten signature in black ink that reads "Keith Taylor". The signature is written in a cursive style with a long horizontal stroke underneath the name.

Keith Taylor - Green Party MEP, South East England.

¹ Coalition Government Programme, May 2010

<http://programmeforgovernment.hmg.gov.uk/communities-and-local-government/>

² European Commission

http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/ec/113591.pdf