

Crookham Village Parish Council Response to consultation on Hart District Council draft Local Plan 5 June 2017



1. Crookham Village Parish Council is very pleased that the Hart Local Plan is finally nearing completion and wishes to emphasise that nothing in this response is intended to delay the process of finalising the plan. However, there are a number of issues which the parish council believes need to be reviewed before the next stage.

2. SC3 Cross Farm

2.1. Our major concern is with the proposal to include an unapproved, and therefore untested, planning application for Cross Farm almost verbatim into the draft plan. We believe that this is not only a sign of inappropriate pre-determination, but also that the proposal runs counter to policies in the draft plan.

2.2. The parish council challenges the unsupported assumption that Cross Farm is the best available site for such a development.

2.3. Policy SC 10 states:

Proposals for housing that is designed to meet the needs of older persons or others requiring specialist care will be supported, where the new housing would:

*c) be located elsewhere, if it has been proven that there are no viable and available alternatives within all settlement policy boundaries. **This must be demonstrated through an open book viability assessment which considers alternative sites within existing settlements that are developable at the time of submitting a planning application.***

No evidence of viability of alternate sites has been presented to demonstrate that Cross Farm is the most suitable, including due consideration of public transport modes and availability of local facilities. Winchfield remains a contender for a new settlement according to the developer, but would be a much more suitable site than Cross Farm should Winchfield New Town not proceed. Alternatively, should Winchfield supersede Murrell Green, then the Murrell Green site would be a more suitable location for a care village than Cross Farm.

2.4. **Policy MG6** identifies a gap between Crookham Village and Fleet/Church Crookham. The Cross Farm proposal would place a dominating modern development of uniform housing plus multi-storey blocks hard up against the linear historic old village and its heritage assets - hence effectively eliminating the gap altogether and dominating the original settlement.

2.5. The Vision states:

*The character, quality and diversity of our natural, built and heritage assets will have been protected, and where possible enhanced. These assets include the Thames Basin Heaths Special Protection Area (TBHSPA), Sites of Special Scientific Interest (SSSI) and other protected habitats, such as the Basingstoke Canal, the chalk downland in the south west of the District, riverine environments, the Forest of Eversley, Historic Parks and Gardens, **Conservation Areas, Listed Buildings and Scheduled Ancient Monuments.***

However, there are no proposed policies to underpin this aspiration to protect conservation areas. Nevertheless, the parish council contends that the imposition of this new development immediately adjacent to much of the Village Conservation Area would have a serious detrimental

effect on the setting and character of this conservation area and its heritage assets and hence run counter to the overall Vision expressed above and any related policies that might be added.

2.6. Policy NE2 states:

Development proposals must respect and wherever possible enhance the special characteristics, value or visual amenity of the District's landscape.

*Development proposals will be supported where there will be **no detriment** to: the particular qualities identified within the Council's landscape character assessment and subsequent updates or relevant guidance;*

It is very clear that the Cross Farm proposal fails this test.

2.7. Policy NE3 states:

*1. Development proposals will be supported where significant harm to biodiversity and/or geodiversity resulting from a development can be avoided or, if that is not possible, adequately mitigated and where it can be **clearly demonstrated that there will be no:***

- a) adverse impact on the conservation status of key species;*
- b) adverse impact on the integrity of designated and proposed European designated sites;*
- c) harm to nationally designated sites;*
- d) harm to locally designated sites including Sites of Importance for Nature Conservation (SINCs) and Local Nature Reserves (LNRs);*
- e) loss or deterioration of a key habitat type, including irreplaceable habitats; and*
- f) harm to the integrity of linkages between designated sites and key habitats.*

The weight given to the protection of nature conservation interests will depend on the national or local significance and any designation or protection applying to the site, habitat or species concerned.

*2. Where development proposals do not comply with the above they will only be supported if it has been **clearly demonstrated that there is an overriding public need for the proposal which outweighs the need to safeguard biodiversity and/or geodiversity** and there is no satisfactory alternative with less or no harmful impacts. In such cases, as a last resort, compensatory measures will be secured to ensure no net loss of biodiversity and, where possible, provide a net gain.*

3. Proposals for development must include adequate and proportionate information to enable a proper assessment of the implications for biodiversity and geodiversity.

CVPC contends that the Cross Farm proposals fail these tests.

2.8. Policy BE1 states:

*The Council will seek to preserve or enhance heritage assets. Proposals will be assessed by reference to the significance of the asset. Substantial loss of, or **harm to, nationally important sites, should only be considered in wholly exceptional circumstances.***

Many Grade II and locally listed buildings immediately adjacent to the proposed care village would suffer significant harm to their historic linear-village setting adjacent to open fields.

2.9. Lack of Evidence of Unfilled Need For Specialist Housing

2.9.1. Table 5 sets out the estimated need for specialist accommodation over the plan period as 1157 bed spaces. The underpinning SHMA states that there is uncertainty in the figures due to a growing tendency for the elderly to opt for care to be administered in their own homes rather than in specialist accommodation. There is therefore some doubt as to the accuracy of the detailed number quoted.

2.9.2. More importantly, no evidence is presented to establish the unfilled requirement for specialist accommodation over the plan period. Given that there has been a surge in provision of such accommodation in Hart in recent years, it is arguable that much of the requirement may already have been met. It is therefore far from clear that a development of the scale proposed at Cross Farm is justified at all. Until or unless such justification is presented, there is no convincing case for a large village at Cross Farm or anywhere else.

2.9.3. Furthermore, the Cross Farm proposal makes no provision for an affordable element which, although missing from the 2016 SHMA, was included in the 2012 version. It is clear that many local elderly would struggle to raise the necessary funds for owner-occupied specialist housing as proposed, so the result of building such a facility would likely be to import richer elderly from elsewhere instead.

2.10. Cross Farm SANG

2.10.1. Given that all development close the SPA requires SANG sites, the parish council suggests that the less-boggy higher area of the Cross Farm site should be considered for designation as a Strategic SANG to provide offsets for a variety of other sites where there is a lack of immediately-adjacent SANG space. This would have the added benefit of preserving the setting and maintain the integrity of the southern gap for the linear Village.

2.11. Other Objections

Please also note and take into account the attached parish council response to the undetermined planning application 16/03400/OUT for Cross Farm, which contains detailed objections to the majority of the detailed proposals which have been transposed into the draft plan.

3. Affordable Housing Uplift

3.1. CVPC challenges the logic behind the proposed Affordable Housing Uplift detailed in Table 1 of the draft. The assumption that the only way to fund affordable housing is via developers as part of larger development has not been argued or justified. Alternative ways of boosting the proportion of affordable housing need to be considered before this uplift can be justified – for example, involving Housing Associations in the building phase using their separate funding streams topped up with council loans on land made available by developers on their major sites.

3.2. A major disadvantage of using an artificial Affordable Housing Uplift is that this would feed into calculations of the 5-year land supply. Given the lack of sanctions currently available to encourage timely completions, this leaves the council very vulnerable to opportunistic developers should completions lag expectations.

4. Objective 3 states:

*“To provide new homes of a mix of sizes and tenures to meet the current and future **needs of Hart’s residents**, including a viable mix of affordable housing; new homes and care accommodation to meet the needs of an ageing population, and homes for other specialist groups.”. The SHMA casts its net much wider than simply satisfying the need solely of Hart’s residents.*

5. **Objective 9** fails to address the many current shortfalls in current infrastructure.

6. **Delivery of Murrell Green v Winchfield**

6.1. It is far from clear that enough of Murrell Green will be deliverable during the plan period to satisfy housing targets. In contrast, the potential developer of the Winchfield (Curtin and Co) wrote to Hart council on 30 May 2017 stating that they already had control of the necessary land with the implication that they would be better placed to meet plan timescales. Winchfield should be re-examined and compared to the Murrell Green alternative to determine that the correct choice has been made (or not).

7. **Winchfield Station**

7.1. Facilities at Winchfield Station are likely to require enhancement as populations served by that station increase due to new developments locally. Consideration should be given to safeguarding land for extension of platforms and increased parking space.

8. **Hartland Park**

8.1. Kennels Lane is far from ideal as a major route towards J4A of the M3. It is strongly suggested that major improvement to this route should form part of the proposals for the Hartland Park site.

9. **Parking**

9.1. No specific reference is made to existing parking standards within Hart. Neither are there any new proposals for parking standards.

9.2. Current parking standards have proved woefully inadequate on existing estates, where on-street parking causes major obstructions to both traffic and pedestrians. Limited sightlines round parked vehicles on non-linear estate roads cause major road safety concerns. A review of parking standards is required with the aim of reflecting reality rather than aspirations for reduced use of the car in areas of limited or non-existent public transport.

10. **Conservation Areas**

10.1. There is a lack of policies to protect the Conservation Areas etc mentioned under the overall Vision.

11. **Detailed Comments on the Draft**

11.1. Please see the attached Word version of the draft Strategy and Sites document where detailed comments are made about the content.

CVPC

5 June 2017

Supplemental comment submitted 9 June 2017:

Current questions raised by minimalist developer offers for sport and community provision on site for both Grove Farm and Hartland Park point to deficiencies in the draft Local Plan in this area.

Crookham Village Parish Council suggests that policies setting targets (both financial and physical) for on-site sports and community facilities related to the size of a development should be added to the draft Plan with reference to scales set by Sport England and others as appropriate. Both general policies and specifics for major sites should be considered.