

**Draft Hart Local Plan, Strategy and Sites 2011-2032 consultation**

Response: Jenny Radley. District Councillor Church Crookham West and Ewshot

8<sup>th</sup> June 2017

Policy issues:

Policy Item	Page	Heading Title	My Comments
SS1	40	Spatial Strategy	<p><b>Typo error page 41, New Homes, part b) Replace word ‘completions’ with word ‘commitments’.</b></p> <p>Where are the lists for both Housing Completions and Housing Commitments on the Evidence base? It would also be useful to have a district map to show where all these completion and committed sites are, so that people can see precisely where agreed development is, so as to see where the proposal site will fit in.</p> <p>This section should clearly explain the need for a New Settlement in order to provide for essential infrastructure, such as a new secondary school, in order to provide for the 10,185 new dwellings proposed during the Local Plan period 2011-2032 for this district.</p> <p><b>I would suggest that it is crucial that essential infrastructure is highlighted as the priority factor to enable sustainable new development.</b></p> <p><b>I would expect that this matter should be properly explained at the start of this document, and that it would reflect the wishes of most local residents who responded to the past public consultations and are very aware of the current local shortfalls, particularly in education and health needs.</b></p> <p>Specialist accommodation: C2 Use Class, of 1200 beds appears to be additional to the overall housing proposal, and would mean the equivalent of a further 20 x 60 bedded residential homes for older people in the district. I estimate this is almost as many beds again as there are in the district already. Where is the evidence of such need? Will this include the equivalent to 40% affordable or social care beds and most importantly how will this be supported by extra health and social services and facilities? What have the 2 CCGs had to say? Why are there no sub-headings for Schools or for Health care provision and transport? These must be recognised needs for any sustainable residential development.</p>
MG1	42	Sustainable Development	<p><b>Please define ‘Sustainable Development’.</b> We need to be quite clear what this really means.</p> <p><b>There is serious need for a Local Policy to provide a level of priority status to Key Workers for access to affordable housing.</b> Hart are in real need for affordable housing to enable essential key workers to live in the area. There is a serious problem as key workers are deciding to live and work in neighbouring areas, such as Surrey, where there is London Weighting provided to key workers. Currently there is no incentive to encourage new Key Workers to move to Hart and the cost of affordable housing is still too much for most new key worker professionals and</p>

			workers. There is a real problem with being able to recruit enough Key Workers, such as teachers, doctors, nurses and care workers, public sector staff, etc, in Hart District, and this problem must be resolved.
MG2	43	Previously Developed Land	<p>Please make it clear in this policy that office conversion sites provide <u>no developer contributions for necessary infrastructure</u>. It is important to factor in the fact that any significant number of new homes through such office conversion planning permissions will add to the problem of inadequate infrastructure in this district. There should be a plan to show how this added shortfall will be addressed.</p> <p>It is important that all major development sites, including those on brownfield sites, must provide the necessary infrastructure to provide for a sustainable development and residential community. There seems to be a problem on some sites, particularly the heralded strategic site at Hartland Village, where the current planning application does not provide the 40% affordable housing, instead the developer is only proposing to provide 20% affordable housing; they are not providing a suitable size of primary school, HCC have asked for a school of 3 forms of entry, and the developer is intending to provide a 2 form entry school; it is not clear where the secondary school children will be allocated and this must be factored into the transport assessment and school travel plans and should not direct these children to 5 different secondary schools, these children should be allocated to the same school to help community cohesion; the developer should provide formal sports grounds suitable for a development of 1500 dwellings in accordance with Sports England specifications; and a suitable SANG land site must be fully agreed before any residential development can be permitted.</p>
MG3	44	Strategic Sites Housing Led	<p>Any proposals must provide for <u>all necessary</u> infrastructure.</p> <p>All strategic sites must provide adequate developer provision and/or contribution for all essential infrastructure and affordable housing. Hart already have a shortfall in essential infrastructure to provide for the housing that is already built, so it is critical that the situation is not allowed to get worse and every opportunity is taken to resolve the shortfall problem. The important example of this problem is the shortage of school places, secondary school places in Fleet and Church Crookham will be inadequate by the year 2022, this is based simply on the current school admission figures of children coming through the feeder primary schools, without even factoring the many new families who are moving into the new homes that are being built in the meantime. This is a fundamental need and the evidence is clear from HCC school figures. The critical date is Sept. 2022 when secondary school places are full in Fleet schools is based on the understanding that Calthorpe Park School will expand to 1650 capacity by the year 2020/21. We know that Courtmoor School is not being proposed for further expansion during this period, as they have no space for further expansion. So a new secondary school is essential.</p>

			<p>Similarly, health care and social care support must also be provided especially to cater for the significant increase in elderly housing and nursing and residential care beds.</p> <p>Provision of public open space must also include the appropriate standard and supply of formal sports pitches and courts, according to Sports England standards. It appears that recent planning applications for major sites do not seem to provide any such facilities, notably for Hartland Village.</p>
MG4	46	Employment-land	If the sites identified at Murrell Green and Eversley Storage are not able to progress then employment land should be planned for suitable alternative sites.
MG5	47	Development in the Countryside	Bullet point f): Specialist housing in rural areas must provide sustainable passenger transport services to enable able bodied residents to access retail, social and healthcare facilities, etc. There is strong evidence to suggest that a new settlement is necessary in order to deliver essential infrastructure for sustainable development. It is likely that the main new settlement site will be on greenfield sites, effectively in the countryside, so it is worth highlighting the criteria that will justify such an important proposal.
MG6	48	Gaps between Settlements	The principle of a gap between settlements should also be applied for the gap between Church Crookham and Aldershot and included on the recognised list. This site is still important to note even though this area is currently mainly Special Protection Area, part of the Thames Basin Heath SPA, on the military training estates. Some people seem to suggest that there is a question about the retention of SPA status after Britain leaves the European Union. It should be made clear that this change should not have any impact on the need to protect such special ecologically and environmentally important local sites.
SC1	51	Sustainable Communities Strategic Housing-led development Hartland Village	<p><b>I have serious concerns with this proposal for the Hartland Village site:</b></p> <p>The site capacity of 1500 dwellings for this site, as indicated in this proposal is far from being consistent with the SHLA high level site assessment for 756 or 660 dwellings that was carried out in 2016. There is no explanation why this much higher number of dwellings for the site is being justified? Surely a sustainable major site of this size requires a much more detailed list for sustainable community provision?</p> <p>Such high density and mass of housing is likely to seriously intrude on the outlook and impact on the nearby SSSI at Fleet Pond.</p> <p>I have serious concerns with the current planning application for the Hartland Village site: There is inadequate provision of affordable housing. The current planning application is 20% affordable housing, not 40% affordable housing, which is required from HDC Housing policy. Inadequate size of primary school, when HCC require 3 forms of entry not just 2 forms of entry. There is no indication at all about where secondary school children will go to school. It is unacceptable to expect these children to attend 5 different secondary schools which would not help to integrate the new community and would cause great difficulty in addressing school</p>

			<p>transport and local highway needs.</p> <p>Transport and highways improvements need to be clarified, as this development is quite separate from the neighbouring towns of Fleet and Farnborough.</p> <p>Complete lack of formal sports areas which must be required for such a large new development, in accordance with Sport England specifications.</p>
SC2	56	Murrell Green	<p><b>There is a need to ensure that primary education provision for 3 forms of entry and a secondary school of 7 form entry is a formal obligation.</b> In fact both school sites must include space to expand, according to district need, which HCC and/r another school provider must be able to provide.</p> <p>This policy states that there should be a site for a 7 form-entry secondary school, because this facility is recognised as being essential for the district need, and if the school is not provided on this site there must be alternative provision made elsewhere in the district.</p> <p>Please note that the secondary school site must allow for further expansion up to 9 forms of entry, because this site will also be important to deliver for further district need.</p> <p>I would also suggest that education provision should also include a suitable sized pre-school site.</p> <p>This site policy must also provide formal recreational space suitable for the proposed site of 1800 dwellings, according to Sport England specifications.</p>
SC3	62	Land at Cross Farm	<p><b>Is this site really suitable and sustainable for such a large specialist housing site?</b></p> <p><b>The policy for 40% affordable housing must be upheld.</b></p> <p>Alarming, the current planning application does not provide for any affordable housing at all and far exceeds the number of dwellings that have been assessed for this site.</p> <p>Please note that new 'specialist housing for older people' may often start as provision for a broad mix of older people's abilities and needs but residents often quickly become highly dependent for health and social care needs. Please see the change at the BUPA home at Freelands Croft and the Extra-Care Home at Campbell Place.</p> <p>It is important to make sure that adequate support services and passenger transport services are also provided to enable this site as a sustainable development.</p> <p>Please note the footpaths in Crookham Village are substandard and not suitable for people in mobility buggies or for those who are unsteady on foot so major improvements are necessary to make the area accessible to residents.</p> <p>The SANG site will require considerable work to make it accessible to elderly residents.</p>
SC4	66	Sun Park	<p>Is this detached site for 320 dwellings really sustainable without <u>any</u> community facilities?</p> <p>Access for this site appears to be separate from any other community, so surely it should have a community hall, sports grounds, playgrounds, local shop, etc.</p> <p>Apparently, according to the Sustainability Appraisal report, 70% of the site is at risk of surface</p>

			<p>water flooding, which must be addressed.</p> <p>It will be important to provide easy safe pedestrian access to the local schools and convenience shops.</p> <p>How will passenger transport services be provided?</p> <p>This site will also require formal and informal sports and play facilities to provide for local residents.</p>
SC5	69	Land allocations for New Homes	<p>The critical issue is to deliver a new settlement site that will provide essential infrastructure, including a new secondary school, that will be large enough to expand enough to take at least 9 forms of entry. There needs to be a clear plan that will deliver the necessary number of new homes in good time.</p> <p>Item c) typo, should read Policy SS1.</p>
SC6	71	Mix for Market Housing	<p>Para 229 on page 72 highlights the need for smaller homes to enable people to downsize. What can be done to prevent small developers taking over these sites and expanding the building to sell at a large profit? If this is not possible then there needs to be ongoing incentive for developers to build new small homes for downsizing purposes, these should not entirely be for elderly residents but also for younger single people and couples who may have disability needs.</p>
SC8	74	Affordable housing	<p>All areas with specialist or significant numbers of affordable housing should be provided with some form of sustainable public or passenger transport service.</p> <p>It is important to uphold the at least 40% affordable housing requirement. This must not be allowed to be dismissed or reduced without full council's permission.</p>
SC10	78	Specialist Housing	<p>This policy should include the need for 40% affordable housing as required by established HDC Housing Policy.</p> <p>This policy should include the need for regular and reliable sustainable passenger transport provision, as many older people reach the stage where they are no longer able to drive anymore.</p> <p>Please note that the recent Extra Care developments and Residential Homes that cater for elderly people with a range of mixed abilities and needs, often quickly become centres of high dependency residents, who will require high level of health and social care needs. Access to the local GP surgeries and Health Centres and local hospitals need to be factored into the requirements for transport and the CCGs and Hospital Trusts must be consulted to ensure they are aware of their own service needs to provide for the health needs of such residents.</p> <p>The area around the Specialist housing sites must be suitable for pedestrians who are unsteady or disabled and pavements need to be improved where necessary to allow for mobility aids and scooters and disabled parking must be provided for residents and visitors.</p> <p>Please also note that new Care Homes often poach nurses and care staff from other local established care and residential homes, they do not generally supply new staff. This leads to</p>

			staff shortages in the local area. So, it is really important to attract more key workers to Hart District to fill the vacant positions. A key worker incentive by providing a priority level policy for key workers for affordable housing would be welcomed by many.
SC11	78	Gypsies, Travellers and Travelling Showpeople	This is a remarkably detailed policy for a need that is apparently not currently required in this district. I am surprised as we had been led to believe that more local transit pitches had been required. If only there was a detailed policy for matters that are of great need in the district associated with development, such as the need for education sites, as so many residents have asked for in the past consultation responses.
ED1	82	New employment	Employment proposals on strategic sites need to be adhered to. Please note the experience that both allocated employment sites on the Crookham Park development were overturned in favour of further residential development, despite employment sites having been a feature of the original planning application in order to avoid unnecessary travel requirements. Local employment sites are important to help reduce the need for more than necessary travel journeys.
ED2	85	Strategic Employment Areas	Redfields Business Park area identified in Church Crookham should also include the Redfields Garden Centre site. See point xvii) on the Locally Important Employment Area list.
ED4	89	Town District and Local Centres	Where do Church Crookham, Zebon Copse, Elvetham Heath, Crookham Park and Ancells Farm fit into this policy? Can they really be simply considered as being extensions of Fleet? They all have their own businesses, community facilities, shops, recreation spaces and play areas that is distant from Fleet Town centre. Surely some or all could be considered as Local Centres in their own right?
ED6	92	Town, District and Local Centres Secondary Frontages	There is no mention of the important shopping parades and convenience shops in the wider Fleet/Church Crookham area, such as those at the Linkway Parade, Ridgeway Parade, Northfield Parade, Crookham Park Local Centre, Pondtail, etc. In fact there are also some important and well used convenience stores at some of the local petrol stations which may need to be recognised too.
ED8	95	Local Centres	Or, should these shopping parades be included as recognised local centres.
NE	96-106		Please note that the table of contents on page 7 of 148 does not show the policies NE1, NE3, NE4 and NE5, or policies BE1, BE2 and BE5. This addition may add an extra page to the contents and alter the pagination throughout the rest of the document.
NE1	96	Thames Basin Heath Special Protection Area	This policy should include an obligation and enforcement powers such that the developer must provide the SANG mitigation ahead of first occupation and that every new resident will be provided with a full explanation and information about the appointed SANG, as well as other local SANG sites. It is simply not good enough to assume this will simply happen, as we have found at Crookham

			Park where the SANG was incomplete and had many months of ongoing site works long after first occupation and many residents at Crookham Park still have no idea what the appointed Naishes Wood SANG is all about. There are regular complaints from residents and users about problems so regular stakeholder group meeting should be set up. Finally I must point out that SANGS have a clear purpose to attract people away from the TBHSPA, so they have to be attractive to local dog-walkers and visitors. There should be no grazing or livestock permission if there is any chance that this use will deter users off from using the SANG, as they are likely to go to the TBHSPA instead.
NE3	102	Biodiversity and Geodiversity	This policy should include the need for linking green spaces in order to avoid isolation of sites and enable integration of green sites and provision of wildlife corridors and channels. There should be a living policy to protect and enhance along with a map to clearly show all designated and relevant sites and links, including the TBHSPA, SSSI, SINCs, BOAs, BPAs, SANGs, nature reserves, wildlife corridors, etc. with ongoing additions as they occur. Is this contained in HDC's Green Infrastructure Strategy and can this be included in the evidence base?
NE5	106	Water Quality	This policy should include a clear map to show the relevant waterbodies, watercourses and other local water features and flood zones that should be available for public information, so that residents and others can understand the areas that may be impacted or affected.
BE4	111	Renewable and Low Carbon Energy	Should we not have a stronger policy to encourage many more developers to install effective energy saving measures? What effective incentives are there that the council can use and would help to promote and encourage developers to deliver such installations?
BE5	113	Pollution	<b>The policy number on this page needs to be corrected to BE5.</b> Hart has a problem with areas of contaminated land, much of which was in military ownership in the past, so records of contaminants and locations are often hard or impossible to find. This is an ongoing problem with so many former military sites coming forward for residential development. There should be due recognition of this problem.
	116	<b>Infrastructure</b>	<b>Section 395 points out that the council is preparing the Infrastructure Delivery Plan (IDP), which will identify key infrastructure projects that will be required to deliver this Local Plan. Why is this IDP not available as part of this consultation? This is a crucial matter for many residents, as was demonstrated in the public Local Plan consultation responses in 2014 and 2016.</b>
Policy I 1	117	Infrastructure	There should be clear recognition that the need for adequate infrastructure is of vital importance to most residents in the district, many of whom have responded to the various recent Local Plan consultations. Please include the additional underlined words to the policy: "All developments that require planning permission must make appropriate provision for <u>all necessary</u> infrastructure, on and off site, or through financial contributions to off-site provision".

			Hart have a shortfall of important infrastructure needs, especially education provision and simply cannot afford to slip back any further. The current shortfall of school places and the needs for permitted development must be addressed as well as for those yet to be agreed. The council should be duty bound to ensure truly sustainable development.
Policy I 2	118	Green Infrastructure	There needs to be an overall policy to ensure that green sites are linked by green corridors, to help enhance and improve biodiversity and avoid isolation of green sites. It is again interesting to see that the Green Infrastructure Strategy for the district is still being prepared. Ideally this document should have been available in time for this consultation. Given that there are at least 2 current major planning applications: Hartland Village; and Grove Farm (Land north of Netherhouse Copse), where no formal recreation space is being proposed, can we be quite clear that formal recreation space and pitches are necessary facilities that must be provided by the developers of major sites?
Policy I 3	120	Transport	This policy should include a commitment for all sites that provide affordable housing or specialist housing to provide sustainable public or passenger transport links to essential services such as shops, health centres, leisure facilities and transport hubs. <b>Where is the Transport Assessment report for this draft Local Plan proposal?</b> This should be available to provide important information for this consultation process.
Policy I 4	122	Open space, sport, and recreation	The table on page 123 about Open Space Standards, should include the formal recreation requirement for any development. It is important that the district does not lose out on formal recreational space especially on large developments where the need is necessary for local sports pitches and activities. This policy should include the need to provide for Sport England requirements.
Policy I 5	124	Community Facilities	Item c must not be open to interpretation and deny the need for new community facilities on new development sites. There are several long established community facilities within the district that may be reaching the stage where they are no longer viable and new facilities will be required to provide replacement or up to standard new facilities. There is understood to be a shortage of community facilities in the district, so it would be useful to formally assess this need in order to justify this policy.
Policy I 7	126	Phoenix Green Flood Alleviation	May I ask if there are other high risk sites in Hart district that would require specific flood alleviation schemes too? Should this policy be altered to allow flood risk schemes to be brought forward for any new flood risk sites as well?
Policy I 8	127	Strategic SANG	It is important that this policy ensures that any alternative strategic sites that may come forward will also ensure for SANG provision, as required, as soon as the sites are identified. Can we make it quite clear that SANG sites must be delivered as complete before first occupation and every new resident provided with clear written information about the site and its use. The SANGs measures need to be effective and enforceable at local level especially on

			site managed by the developer or other agency.
Policy I 9	127	Safeguarded Land for Education	<p>It is remarkable that this policy does not include a defining clause that will ensure that a new secondary school site will be included to accommodate the essential secondary school need in the district. A new secondary school should be delivered by Sept 2022 to provide for secondary school place shortfall.</p> <p>The secondary school capacity for the Fleet and Church Crookham area will be fully taken up by the year 2022, and that is with the expectation that Calthorpe Park School will be extended to 1650 capacity and Courtmoor School will remain at full capacity at 1100 pupils. There is a well recognised need that a new secondary school will be required in Hart District during this Local Plan period. This fact was recognised and agreed by Full Council at their meeting on 27<sup>th</sup> October 2016 when the majority decision was to agree to a motion:</p> <p><b>“That the Council resolves that through its Local Plan it will seek to meet Hart’s full, objectively assessed need for new homes, subject to the inclusion of an appropriate contingency to allow for any delays or the non-delivery of sites, and that it will also seek to accommodate any demonstrated unmet need for new homes from its Housing Market Area partners”.</b></p> <p><b>“And additionally provide for essential infrastructure for including a site for a secondary school.”</b></p> <p>It is essential that a site or sites for at least 9 forms of entry secondary school/s is included in this Local Plan document, so that this important facility will indeed be provided in good time, that is from September 2022.</p> <p>It must be understood that in due course the full 15.5 forms of entry additional secondary school places will be required, although I accept that a small part of this demand will be required beyond the plan period, as new families who move to the area may not start having children for a few years and so most of those children will have to progress year by year through the pre-school and primary school system first.</p> <p>Please note that HCC are using an updated calculation model to predict school places need for children in Hart district. This calculation effectively requires one form entry (a form is a class of 30 pupils) for every 550 dwellings of 2 bedrooms or more. So, for the overall Local Plan period 2011-2032 which will provide 10,185 dwellings there will be a need to about 15.5 forms of entry school places, that is 15 ½ extra classes (about 465 children) in each year group throughout the school education range, from Reception year to Year 11. This number of extra school places simply cannot be provided by expanding the established school sites in Hart District. In fact, most schools that can be expanded have already been done and will reach full capacity in the near future, so a new secondary school and a number of new primary schools</p>

			<p>will be essential in Hart district. This matter cannot be denied nor overlooked. Of course it is also important to identify new sites for the necessary pre-school and nursery school sites too. Please also note the need to consult HCC Education/ School Organisation team but also new Academy or Free School providers, who may also be able to negotiate and build the necessary new school sites.</p> <p>I must add that I find it quite alarming that this important policy item, which still requires much more detail, has been included at the very end of this Local Plan document and is not featured in the introductory pages.</p>
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