



Crookham Care Village Ltd

Representation on

CROOKHAM VILLAGE PARISH NEIGHBOURHOOD PLAN

APPENDIX 3 – ADDITIONAL EVIDENCE IN RELATION TO ‘GAPS’

November 2019 | AM-P Ref: 18019





1.0 Introduction

- 1.1 AM-P are instructed by Crookham Care Village Ltd to submit this representation on the Crookham Village Parish Neighbourhood Plan 2018 – 2032 – Appendix 3 – Crookham Village Parish Council Clarification Response. The comments provided in this representation follow on from those provided during the consultations undertaken in January and August 2019.
- 1.2 The Neighbourhood Plan includes Policy NE01 which relates to preserving the Gap Between Settlements. As set out in this representation (and our previous representations) we raised concerns regarding the evidence (or lack of it) used to justify the designation and extent of the proposed Local Gap in the emerging Neighbourhood Plan. The appointed Neighbourhood Plan Examiner has sought clarification on the evidence used to justify the proposed Local Gap. In response Crookham Parish Council have produced Appendix 3. We have reviewed this document and provide the following comments.

2.0 Reliance on adopted Local Plan policy CON21

- 2.1 As set out in Appendix 3, justification for the proposed Local Gap relies heavily on the historic designation as set out in the currently adopted Local Plan Policy CON21. It is a fact that Inspectors in recent planning appeals (e.g. APP/N1730/W17/3167135) have found and concluded that policy CON21 to be “out of date” as Local Gaps have not been reviewed for a number of years and should only be protected up to 2006. Local Gaps have not sufficiently been reviewed to date (note paragraphs 3.1 and 3.2 below) and therefore it is our view that little consideration can be given to Policy CON21 in justifying the proposed Local Gap. It is our view that until Local Gaps have been comprehensively reviewed and justified, CON21 should still be considered ‘out of date’.

3.0 Emerging Hart District Local Plan

- 3.1 The emerging Local Plan offered an opportunity to comprehensively review Local Gaps in Hart District. It is clear that Hart District Council declined to undertake this review as part of the emerging Local Plan process. The Council confirmed in their Hearing Statement on Matter 12, paragraph 12.7.2, that no detailed review of Local



Gap boundaries had been undertaken, stating, “undertaking the boundary reviews across the district is time consuming and would have added to the time taken to prepare the Submitted Local Plan and finalising the housing land supply.” The Council made clear in paragraph 12.6.1 “the Council intends to prepare a Development Management Policies Plan following the adoption of the Submitted Local Plan. The boundaries of both settlement boundaries and gaps will be reviewed and defined through this process”. It should be reiterated that the emerging Local Plan did contain policy NBE2 relating to ‘gaps’. Only ‘indicative’ Local Gaps were included on the proposed Policies Map. The proposed Local Gaps were only ‘indicative’ as a comprehensive review had not been undertaken. However, modification MM82 is proposed that will delete Policy NBE2 and all ‘indicative’ Local Gaps from the emerging Local Plan and Policies Map, including the Fleet/Church Crookham to Crookham Village Local Gap, which the proposed Local Gap in the Policy NE01 is based on.

- 3.2 As Appendix 3 points out, we note that deleted policy criteria included in NBE2 relating to coalescence and separate identity have been incorporated into emerging policy NBE3, via modification MM83. Therefore, the emerging Local Plan is proposed to contain policy that seeks to support development, “where it does not lead to physical or visual coalescence of settlements or damage their separate identity...”. Furthermore, the emerging Local Plan Policy NB1 Development in the Countryside is intended to maintain the existing open nature of the countryside, protect and enhance rural landscape character, prevent coalescence of settlements and resist the encroachment of inappropriate development into rural areas (see paragraph 261 of the Proposed Submission Hart Local Plan – Feb 2018). It states that “the countryside is therefore subject to a more restrictive policy approach, recognising its intrinsic character and beauty. There should be good reason to site new development in the countryside and development will not be permitted that would be better situated in an urban location or which contributes little to the benefit of the countryside, or where the benefits to the countryside are greatly outweighed by the harm.” It is our view that these policies would be sufficient to manage any planning applications that may result in the coalescence of, or harm to, the separate identity of neighbouring settlements. However, Appendix 3 provides no evidence as to why Policies NBE1 and NBE3 are insufficient to control development outside identified settlement boundaries. It is our view that proposed Policy NE01 is therefore unnecessary and that emerging policies NBE1 and NBE3 provides sufficient policy control to address the concerns and aims of the emerging Neighbourhood Plan.



3.3 In addition, Policy NBE3 is proposed to supersede the adopted Policy CON21, meaning that at adoption of the emerging Local Plan, all existing Local Gaps (except those contained in adopted Neighbourhood Plans) will cease to exist (including the Fleet/Church Crookham to Crookham Village Local Gap). It is our view therefore that ‘rolling forward’ the adopted Policy CON21 provides little justification for the proposed Neighbourhood Plan Local Gap given that it is clearly ‘out of date’ (due to lack of review) and will be superseded soon by emerging Policy NBE3. The Council failed to take the opportunity to review Local Gaps in its emerging Local Plan (leaving it to a future date) which has been recognised by the Local Plan Inspector as a key concern resulting in the ‘indicative’ Local Gaps being deleted from the emerging Local Plan.

4.0 General Comments on Appendix 3

4.1 While we recognise, as set out in MM83, that Neighbourhood Plans can be a planning tool to designate a Local Gap, it is our view, having reviewed appendix 3 that there is insufficient evidence to justify the proposed Local Gap in the emerging Neighbourhood Plan. The evidence provided can be generally described as descriptive and reliant on ‘out of date’ historic policies. Appendix 3 provides no new evidence/assessment, indeed we can find no robust methodology used to review and justify the Local Gap and its extent.

4.2 In order to justify a Local Gap designation and its precise boundaries it is our view that a vigorous detailed review needs to have been undertaken. It is our view that the following three criteria should be met in order to justify a Local Gap designation:

a) The land is predominantly open or undeveloped and provides a sense of separation between settlements;

b) The land performs an important role in maintaining the separate identity of settlements at risk of coalescence; and

c) In defining the precise extent of a Gap, no more land than is necessary to prevent the coalescence of settlements will be included, having regard to maintaining their physical and visual separation.



4.3 It is our view that appendix 3 fails to do this. No detailed assessment, following a robust and tested methodology, has been undertaken and therefore there is insufficient evidence to justify the Local Gap designation. Importantly, there is no evidence that any assessment of conditions ‘on the ground’ has been made or that any active assessment of Local Gap boundaries has been undertaken. For example, there has been little consideration of the following which are all important considerations in designating a Local Gap and its extent:

- landscape character;
- the sense of arriving/leaving the Crookham Village/Fleet;
- landscape features;
- topography;
- distances/views;
- existing vegetation and land uses; and
- the nature of settlement edges and how they integrate with the adjacent countryside.

4.4 As the Local Plan Inspector found, it is insufficient to just ‘roll forward’ outdated gaps boundaries (as set out in CON21) without undertaking a detailed review or new assessment. The proposed boundaries of the Local Gap follow those in the now deleted emerging Local Plan Policy NBE2 (which was based on the ‘out of date’ adopted Local Plan Policy CON21). In looking at the proposed boundaries of the Local Gap it is clear that they follow artificial lines (e.g. north of Pilcot Road) which suggests little consideration has been given to proposed boundaries. It is our view that proposed Local Gap boundaries should relate to definable physical features (e.g. roads or rivers etc) that are likely to endure over the period of the Neighbourhood Plan.

4.5 We wish to make the Examiner aware of other Neighbourhood Plans at Winchfield and Odiham and North Warnborough (also in Hart District) where the Examiner deleted proposed Local Gaps due to insufficient supporting evidence.

5.0 Conclusion

5.1 Taking account of all the information provided in appendix 3 we are of the view that there is insufficient evidence (or other information presented) to justify the Local Gap designation.



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- 5.2 Justification for the proposed Local Gaps relate to ‘out of date’ Local Plan policies. It is insufficient to just ‘roll forward’ outdated Local Gap boundaries (soon to be superseded) without undertaking a detailed review or new assessment based on a robust methodology. There is no evidence that any assessment of conditions ‘on the ground’ has been made or that any active assessment of Local Gap boundaries has been undertaken. The deletion of Local Gaps from the emerging Local Plan and from a number of other Neighbourhood Plans in Hart has resulted due to insufficient evidence and justification.
- 5.3 It is our view that emerging Local Plan policies NBE1 and NBE3 will be sufficient to manage any planning applications that may result in the coalescence of, or harm to the separate identities of neighbouring settlements outside of settlement boundaries. No evidence as to why policies NBE1 and NBE3 are insufficient to control development outside the identified settlement boundaries has been provided.
- 5.4 It is therefore our view that the proposed Local Gap policy should be deleted and supporting designations removed.