

Hart District Council Comments on the Odiham and North Warnborough Pre-Submission Neighbourhood Plan

Page	Para/Policy	Comments
6	1.3	It might be worth cross referring to the 'Aims and Proposals' Section of the Plan here to explain the Plan includes a section of other local priorities but which are not part of the 'development plan'?
7	1.11	This is currently inaccurate. In November 2014 the Council agreed a housing distribution strategy purely for testing . Further consultation is currently on-going. The strategy agreed for testing may change following further consultation and evidence gathering.
8	1.12	The Local Plan is likely to be examined and adopted during 2017
9	Plan	Re-title this plan as the 2011 – 2032 Local Plan doesn't exist – perhaps 'Map of Hart's Settlement Hierarchy'? Also could put this earlier on to set out the location of Odiham and North Warnborough within Hart?
16	Reference to schools	Agree with this part of the Vision – however see comments under Policy 10.
17	3 rd bullet point	Is there a more positive way to express this – perhaps reconsider the use of 'as far as possible' – could say 'conserves and enhances'?
	5 th bullet point	Would 'suitable' be better placed before 're-development'?
20	Policy 1 and paragraphs 3.8 and 3.9	<p>Land at Hatchwood Place is currently being developed and consideration should be given to whether it is appropriate to include this within the settlement boundary in order to accurately reflect the extent of the built up area.</p> <p>The Proposals Map indicates that Archery Fields, proposed as a Local Green Space is to be excluded from the settlement boundary. However, you will be aware that this site has outline planning permission for residential development and its exclusion would therefore seem inconsistent with other boundary changes which have been made.</p>
21	3.11	We are pleased to see that the draft Plan has considered that expansion in Flood Zone 2 and 3 should be avoided. However, other sources of flooding has not been considered. There are a few locations at high risk of surface water and ground water flooding. Internal flooding can be devastating regardless of source. We would therefore encourage all sources of flooding should be considered when allocating site for development. This is in line with requirements of the sequential test set out in the NPPG.
21	3.14	See comments for para 1.11. The Council is still undergoing consultation and testing on the final approach to new homes. This paragraph should reflect that the Council has agreed a strategy for testing rather than adopted a strategy as suggested.
22	3.14	Is the windfall allowance evidenced anywhere?

22	3.15	The Plan should not seek to artificially limit the number of new homes if suitable sites are available although we would support the recognition in the next version of the Plan of the most up to date position on sites with planning permission.
23	Policy 2(i) - g and 2(ii) g and 2(v)k.	Reference to SAMM could read ‘..towards monitoring measures across the Thames Basin Heaths SPA’ It would then be helpful to include a paragraph explaining that because the three sites exceed 50 dwellings mitigation measures will be required which includes the provision of open space and the need for SAMM contributions (although only the Monitoring requirement is needed).
	Policy 2 – all sites	Some sites have issues relating to surface and groundwater flooding which need to be explored further and may result in a need to reconsider the indicative layouts. Sites 2.ii-2.vi all have some areas of flood risk with particular concerns at site 2iii. A number of the design principles have located proposed properties in the areas of highest risk on site. We would strongly encourage the design principle layouts to be reconsidered to try and avoid the areas of highest flood risk on site. Ideally the high risk locations within the site should be left as open space in line with the sequential approach. If properties have to be located here, mitigation measures such as raised finished floor levels and underfloor voids will be needed to minimise the risk of internal flooding and prevent flood risk elsewhere from increasing. We are happy to provide you with detailed mapping and advice etc in order to achieve this. Further advice can be obtained from Susanna Hope, Flood Risk Infrastructure Engineer at susanna.hope@hart.gov.uk .
25	Criterion b	Should reference to Green Space be to ‘Local Green Space’?
35	Policy 3	In preparing the withdrawn Core Strategy Hampshire County Council (HCC) required land to be safeguarded for the future expansion of Robert Mays School. Subject to comments from HCC the proposed designations on these sites may be of concern in terms of helping deliver future infrastructure required to support new development. The area delimited for education purposes has a number of small surface water overland flow routes. This may not precluded development but flood risk mitigation measures should be included in any development. Ideally the small areas of surface water overland flow routes should be left open.
35	3.22	Penultimate sentence – ‘ this Plan ’?
36	Policy 4 (ii)	The District Council has a responsibility to meet the housing needs of the Hart district in the widest sense. We are, regrettably, not able to support this aspect of the plan as it includes provision for a specified percentage of affordable housing on new general needs development sites to be allocated to people with a specific Parish connection to Odiham. Such an approach would conflict with the Council’s approved Allocations Policy. The Allocations Policy sets

		<p>out the process and approach through which social housing is allocated and this is on the basis of a priority system reflecting levels of need. If a Parish Council wishes to secure affordable housing for local people in perpetuity, Rural Exception Site development is the approved mechanism that facilitates this. Parish Councils can allocate sites in their Neighbourhood Plans as Rural Exception Sites should they wish to pursue local homes for people who can demonstrate strong Parish connections.</p> <p>To provide local Parish connection preference beyond the scope of Rural Exception housing, would not only sit outside the scope of the current Allocations Policy, but could also give rise to future legal challenges from applicants in housing need who live in other parts of the district. This is particularly relevant when considering that new housing development is unlikely to be evenly spread across all areas in Hart.</p>
36	Policy 4 (iii)	This repeats current saved Local Plan Policy so would question its inclusion. It is more stringent than the saved Local Plan Policy which includes 40% as a target and has other considerations and is therefore inconsistent with the Strategic policies in the Local Plan.
36	Policy 4 and para 3.27	It is not clear whether this Policy in terms of affordable housing provision and housing mix applies to the allocated sites. As these are likely to provide the most significant areas of new housing presumably they offer the best opportunity to meet the mix of homes that is needed.
		The Neighbourhood Plan could consider the identification of a Rural Exception Site. This would be the best way to secure affordable housing in perpetuity.
37	3.31	Second sentence – SHMAA For clarity make clear the SHMA was for Hart, Rushmoor and Surrey Heath?
	3.32	<p>This ought to say “Hart District Council housing department” not “Hart Housing” as that was the LSVT housing association. May be confusing.</p> <p>Should also say with reference to the housing need on the District Council’s housing register.</p> <p>Sentence doesn’t make sense “The Local letting criteria.....”</p> <p>Is it appropriate to specify Odiham Consolidated Charities at this stage?</p> <p>Should say “informed by the housing register “ too.</p>
	3.34	Whilst this is just referencing feedback from consultation, comments against Policy 4(ii) apply.
39	Policy 5 viii	Perhaps add ‘and any subsequent updates’ at the end, or re-word to refer to ‘Hart’s adopted parking standards’?
42/45	Policy 7 - 1st paragraph	Clarity of last part of the sentence – delete after ‘following’?

	Policy 8 – 1 st paragraph	
47	Policy 9	Delete 'below'? Perhaps replace 'the design guidance' with 'other policies' – or refer specifically to Policy 5?
	Policy 9	You may be aware that the Government recently amended permitted development rights so that A1 premises can be converted to A2 without the need for planning permission. Whilst this policy will obviously only apply to proposals which need planning permission, this may affect the proportion of ground floor uses in non A1 use.
	Policy 9	The Retail, Leisure and Town Centres Study (listed as part of your evidence base) produced to support the preparation of the Hart Local Plan includes an assessment of Odiham centre and makes recommendations on the proportion of A1 to be retained. Whilst the areas surveyed may be different (and the Councils study is from 2014 data), this identified that 62 % of units were in A1 use (compared to 37% in the NP) and that consideration should be given to a policy protecting 50% of units for retail (A1) (compared to 33% in the NP). In view of the difference between the evidence base and the information in the pre submission Plan it may be worth including some short explanation in the text. I think that your survey also includes other ground floor uses in the overall calculations such as hotels and offices which may not have been included within the Council's Study. Ray Bryant (ray.bryant@hart.gov.uk) in the Planning Policy team can provide further information on the Retail, Leisure and Town Centres Study.
48	Policy 10	Subject to comments from HCC regarding the need to safeguard land for future expansion, this Policy and associated designations may prohibit further school expansion. Subject to HCC comments we would be happy to explore options for wording etc if that would be helpful.
	Policy 11	Hockley's Farm – this site may be needed for safeguarding for future school expansion. Land adjacent to Archery Fields – as discussed, this site has outline planning permission for residential development. This should be acknowledged in the text, and you may want to consider whether this alters your decision to include it, or to make any other changes to the wording, particularly bearing in mind the justification for including this site against the NPPF criteria and set out in your background evidence paper.
49	Para 3.46 3 rd bullet point	'S' missing in SSSI
51	Para 3.51	Comments on expansion of Robert Mays School as above
51	3.53	Comment on planning permission as above.
52	Policy 12	i – SINC's – in full? iv – would it be helpful to split this into two points? We are pleased to see that the use of Sustainable Drainage Systems (SuDS) are being encouraged as is adapting to climate change. However, SuDS are just a sustainable way of managing

		<p>surface water runoff from a site. They do not protect a site from flooding nor by themselves do they reduce runoff rates from a site unless they are design to discharge at a specific runoff rate. For this reason it might be good to expand policy 12 to cover:</p> <ul style="list-style-type: none"> • Where flooding from any source could occur onsite mitigation measures should be employed to ensure that development is safe and won't increase flood risk elsewhere. Including: <ul style="list-style-type: none"> ○ Sites should be developed so as not to increase surface water runoff rates and discharge volumes leaving the site. Development should employ a wide range of SuDS measures in a SuDS treatment train. ○ high risk areas of sites should be avoid in accordance with the sequential approach <p>Measures should be employed to prevent internal flooding and the diversion of flood waters elsewhere.</p>
52	Para 3.58	Elements of this paragraph are not included in Policy 12 and are perhaps Policy not text?
53	Para 3.63	We are pleased to see that SuDS are encouraged as is riparian maintenance. However, no measures have been mentioned to ensure that new development in areas of flood risk will be safe. These included laying out the development to avoid areas of risk (sequential approach), raising finished floor levels, and using underfloor voids where necessary to prevent the obstruction and displacement of flood waters. These measures are needed as a number of the sites selected for housing development have a high risk of surface water and groundwater flooding.
56	Para 4.8	Needs 'of' residents
56	Para 4.12	Might be helpful to add '(once in place)' after Community Infrastructure Levy?
General		Reference is made throughout the document to Proposals Map. Current legislation and guidance refers to a Policies Map and this is the terminology used in the withdrawn Core Strategy and will be used in the new Local Plan. Could consider whether it would be helpful for terminology in the NP to be consistent?