

Hart District Council comments on the Regulation 16 Submission Hartley Wintney Neighbourhood Plan

March 2019

Hart District Council welcomes the opportunity to comment on the Hartley Wintney Neighbourhood Plan: Submission version and our comments are set out in the table below. We recognise that the Plan has been prepared within the context of an evolving Local Plan and also national policy and would therefore commend the Parish Council on their progress.

Policy or para	Planning Policy Comments
General - NPPF	This Plan is submitted and considered under the NPPF 2012. However as there has also been a revised NPPF published in 2018 it would be helpful for clarity to set this out somewhere near the start of the Plan and to make clear that references to the NPPF are to the 2012 version unless otherwise stated.
General Policy wording	In order to be consistent with the NPPF and provide clear policies, some Policies would benefit from tighter wording making clear what will and won't be supported. Examples include the site specific elements of Policies 1 – 3 and Policy 11.
Para 2.1.1	Helpful to clarify that the Examiners Report will be considered by both the District and Parish Council and also to add that the majority must be 'of those who vote'.
Table 1	As set out in previous comments on the Pre-Submission Plan, the latest SCI was adopted in July 2014 with amendment in April 2017.
Section 3 Planning Policy	Section 3.3 is confusing and would benefit from clarification as set out in previous comments. We would question the value of inclusion of para 3.3.1 and consider that much of the text could be updated. Reference to an Interim Housing Delivery Strategy should be deleted – it has long since been withdrawn. There are references to evidence base studies and SPA issues which need to be clarified and their relevance made clear.
Para 4.4 Objectives	Objective 1 should refer to a 'minimum' of 23 new dwellings Objective 5 should 'settlements' be 'developments'?
Para 5.1.7	Mentions a need for local homes. This might be clearer if it says "homes for local people" if that is what is meant.
Para 5.1.18	It is good to include the reference to encouraging the provision of a rural exception site.
Para 5.1.20	The reference to affordable housing in perpetuity and exception sites has been clearly explained.
Paras 5.2.1 - 5.2.4	This section could have been redrafted to reflect the greater certainty of numbers provided by the submitted Local Plan in June 2018.
HW Policy 1,2 and 3 (site allocations)	We support the Parish Councils ambition to proactively identify sites for development. However, it is not clear from the Plan or supporting evidence how the final three sites were derived. Clearly two are brownfield sites within the settlement boundary but James Farm lies outside the settlement

	<p>boundary. Whilst the process for site selection is set out in Appendix 4 of the Plan the detailed outcomes of this process are not evident.</p> <p>It is also not clear that the allocations are compliant with national flood risk policy including the flooding sequential and exception tests despite these concerns having being raised previously and advice on the Sequential Test provided.</p> <p>It is not clear that this requirement has been met on all sites. Apart from Pools Yard no sequential test information has been submitted. Nero Brewery (HWS1) and Pools Yard (HWS3) are both in Flood Zone 2 and James Farm (HWS2) are at high risk of surface water flooding.</p> <ul style="list-style-type: none"> * No mention of FRAs have been made in any of the site policies * No recognition has been made of the surface water flooding issues at James Farm. We are concerned that this development cannot be made safe and may increase flood risk off site. <p>All policies include a bullet point in relation to SANGs. As none will be large enough to provide a bespoke SANG it is not clear why this is referenced in the Policy – or reference to the planning obligation required. It might be more consistent with the South East Plan and emerging Local Plan to reword this bullet to say ‘Development proposals will be expected to provide appropriate mitigation in line with other development plan policies. This will include contributions to, or provision of Suitable Alternative Natural Greenspace (SANG) and contributions to Strategic Access and Management and Monitoring Measures (SAMM). Any mitigation proposals should be agreed with the District Council and Natural England’.</p>
HW Policy 1 – Nero Brewery	For clarity is ‘associated open space’ meant to relate to garden space shared or otherwise or the provision of on-site open space?
HW Policy 4 Design Guide	Delete ‘ HDC statutory’
HW Policy 5 (and Objective 2)	Object to the maximum of 50 dwellings on any single development (H5 first bullet). The rationale for this policy appears to be that there is a preference locally for small sites over large sites, and a concern that if the District Council has to allocate more sites in Hartley Wintney that it may choose to allocate one or more large sites. The preference for smaller sites is understood, and this has been translated into the site allocations in the Neighbourhood Plan. However, if additional site allocations are needed in Hartley Wintney, whether allocated through a District Council plan or a Neighbourhood Plan, sites should be selected on their own sustainability merits, in the context that prevails at that time, including the number of homes required in the area and the choice of sites available. All choices should be considered in a fair and reasonable manner, including testing through the sustainability appraisal process. This process would be subject to community consultation in any event. The community would express its views in

	<p>light of the realities and choices available at that time. This policy is therefore not necessary or justified. It even has the potential to be counter-productive bearing in mind opinions can change over time particularly if circumstances change.</p> <p>As the policy as reads, it would apply to any site that comes forward for 50 or more homes. This arbitrary limit would apply even if a good scheme for 50+ units came forward on a brownfield site in the village. This is clearly unjustified. The policy is therefore inappropriate having regard to national policy and guidance.</p>
HW Policy 8 – Conservation Areas	<p>There is more than one Conservation Area in the Neighbourhood Area so this should refer to Conservation Areas in the plural unless it is only meant to deal with one of the CA's (Hartley Wintney). As suggested at the Pre-submission stage this Policy could have been expanded to cover all heritage assets particularly as there is reference in the supporting text to listed buildings. Reference could also be made within the Policy to development being consistent with the Conservation Area Appraisals. Some additional information regarding the Conservation Areas within the Parish would be helpful to add clarity. Suggest the following amended wording to the Policy:</p> <p>Development within the Conservation Area or <u>within the setting of a Conservation Area</u> should demonstrate that it will conserve or enhance the heritage asset <u>or its setting</u> in accordance with its significance.</p>
Policy 9 – Control of Artificial Light	<p>It is not clear what would comprise the appropriate assessment in the context of this Policy. In order to be more clearly understood for development management purposes this Policy would benefit from being worded along the lines of 'Development will be supported which...'</p>
Paragraph 7.1.5	<p>This paragraph seems to suggest that the Plan has set specific parking standards. Reference to parking standards in the site allocation policies is to the District Councils Interim standards rather than any local standard.</p>
Paragraph 7.1.9	<p>The Council has not made a formal decision to progress CIL.</p>
Policy 11 – Cycleways and Footways	<p>This does not currently read as a Policy. See General comment above.</p>
Policy 12 – Protection of Retail premises	<p>The second bullet could be deleted as only applications requiring permission would be considered against this Policy. It is not clear to the decision maker what would comprise 'appropriate or 'well – located' retail/food and drink development – does this mean within the Primary Shopping Area or within a wider and undefined area?</p>
Policy 13 – Re-use of Agricultural Buildings	<p>The second sentence of this Policy is supporting text and not Policy. Delete 'strong'.</p>
Building Design Guidelines	<p>We have the following suggested additions:</p> <p>*Resisting the provision of illumination or illuminated signage on business or commercial premises that only have a day time occupancy or opening.</p>

	<p>*Desire to incorporate in a traditional manner the address number of a building in the design of the premises. Consider the addition or retention of traditional numbering brass door numbers, decals or lettering/numbers added to borrowed lights and within indoor thresholds for example.</p> <p>*Reference to appropriate scale of hanging signs with reference to position and façade where it is to be attached.</p> <p>(Lettering proportion on signage and rationalisation of number of signs highlighted but not scale/size of hanging sign)</p>
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