

Yateley Town Council: Response to Hart District Council's Regulation 16 Representations

Please see below the response prepared by the Yateley, Darby Green & Frogmore Neighbourhood Plan Steering Group, on behalf of Yateley Town Council, to Hart District Council's representations.

Hart District Council's Comment	Agreed Response
<p>Page 5 para 3 - update Acknowledge that this para repeats the basic conditions – final bullet referring to Conservation of Habitat and Species Regulations 2017 has been updated post Brexit. https://www.legislation.gov.uk/ukxi/2018/1232/regulation/2/made</p>	<p>Web reference will be added.</p>
<p>Page 8 Map 2 – edit for clarity Suggest the title of the Map is changed from 'Yateley Special Protection Areas' to 'Yateley's Ecological Designations', to avoid confusion with the SPA itself.</p>	<p>Title will be changed for Map 2.</p>
<p>Page 9 para 18 - update Consider referring to the impact of Covid on travel to work patterns.</p>	<p>The impact of COVID-19 has been considered and we see the significant impact as being covered by YDFNP11 – Telecommunications and YDFNP14 – Home Working.</p>
<p>Page 11, para 21 - To reflect the current situation but recognize this could change during the course of the examination/adoption process.</p> <p>The Planning Bill has yet to be published – suggested edit :- Although The Government is in the process of publishing has introduced a Planning Bill which will take forward proposed planning reforms it is unlikely that the majority of changes will be in place in the time frame within which the Neighbourhood Plan will be adopted.</p>	<p>Accept amended text.</p>
<p>Page 17 section on Vision and Objectives - To clarify the intention of the NP through its vision and objectives</p> <p>Welcome the table on page 19 which illustrates the linkages between the objectives and policies, but query whether the detail in para's 37 – 41 is necessary.</p>	<p>No change. The information within paragraphs 37 – 41 provide useful context and so the Council would like to keep it in the Plan.</p>

Page 20 – clarification

Para 44-45 The Council’s Housing team has suggested reference to affordable housing exception sites that could be delivered outside of the defined settlement boundaries and/or insert reference to Hart’s Local Plan Policy H2 and that affordable housing will only be provided on sites of 10 or more/0.5 ha.

Paragraph 45 – update whole para to read:
For Yateley Parish other key elements of sustainable development relate to avoiding flood risk, to the protection of green infrastructure and strengthening of biodiversity; to enhancing opportunities for active travel; to ensuring that infrastructure needed to mitigate the impact of development such as highway improvements, green infrastructure and social infrastructure is provided alongside new development and ensuring that affordable housing is provided on qualifying developments as defined by Policy H2 of the Hart Local Plan 2016-2032. The expansion of existing employment or business uses to provide additional job opportunities will be supported.

**Page 21 section on Climate Change –
To clarify this section and the role of the NP on this matter.**

Para 50 and 51, question how the NP will achieve this.

Paragraphs 50 and 51 - these requirements are essential if the parish is going to reduce its carbon emissions in line with ICCP6 recommendations to reduce carbon emissions by 50% this decade.

Para 52 – perhaps provide a link to the Government’s website to aid the reader to understand the impacts of changes to the Building Regulations on this matter as new regulations will come into force from June 2022- all of which are outside the scope of the NP.

<https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-1>

Agreed to add the reference to paragraph 52.

Para 53 – 59 edit to focus on salient points relevant to Yateley parish and the NP as a land use planning document.

No change. Paragraphs 53 - 59 provide the background for proposing YDFNP2 and so are needed to explain why the various requirements in YDFNP2 are specified.

Para 60 – amend first sentence to read “All new developments should minimize energy use and maximize the proportion of energy used from renewable sources where possible”.

No change. Paragraph 60 - it is not sufficient to minimise energy use where possible because carbon neutral homes can be built today. New builds can simply not add to the parish’s existing carbon burden.

Policy YDFNP2 – to clarify application of policy.

Policy YDFN2 (First sentence) is expressed to mitigate impacts of climate change in accordance with HDC’s Climate Change Action Plan – the purpose of this action plan is to deliver net zero carbon emissions from HDC operations by 2040. Whilst some of the actions could have wider impacts the focus is on HDC activities it is therefore suggested that this reference is deleted as follows:

~~“As appropriate to their scale, nature and location~~
Development will be supported where it contributes to adapting and mitigating against impacts of climate change, ~~in accordance with HDC’s Climate Change Action Plan. As appropriate to their scale, nature and location,~~ developments will be supported which consume less energy than the development they are replacing and which minimise carbon emissions to the atmosphere by incorporating the following measures where possible:

The remainder of the policy lacks clarity as to how each of the requirements specified will be measured and achieved. There is no indication if each bullet is to be complied with or if these are alternatives.

Accept amended text.

No change. This list forms a check list for developers when designing new developments and will help speed up planning permission.

Page 26 section on Natural Environment

Update -

Para 64 – update reference to the Environment Bill which became law on 9 November 2021 and there will be a mandatory requirement for developments to achieve a 10% biodiversity net gain in due course.

Clarification –

Para 68 – this para only refers to the 5km restriction for the SPA, however a significant portion of the built up area along the southern edge of the parish and the settlements of Yateley and Darby Green lie within the 400m buffer. Policy NBE3 of the Hart Local Plan restricts development within the 400m exclusion zone. It is therefore suggested that this para is amended to reflect the 400m exclusion zone.

Clarification –

Para 69 – the Council’s ecologist has suggested that as the Parish has many Habitats of Principal Importance (HPI) such as deciduous woodland, Floodplain Grazing Marsh, Purple Moor Grass and Rush Pasture & Lowland Dry Acid Grassland and hedgerows, that these could be mentioned in this section.

Clarification –

Para 70 final sentence suggest this is edited to refer to species with ‘a known benefit to wildlife’ as planting schemes which include lavender for example are often easier to achieve and have broader benefits; – ‘New trees and landscaping should be of appropriate native species or species with a known benefit to wildlife.

Paragraph 64 - update text with reference.

Paragraph 68 - amend text to reflect exclusion zone.

Paragraph 69 - add reference to these sites.

Paragraph 70 – accept amended text.

<p>Policy YDFNP3 – update</p> <p>Given the Environment Act and a greater emphasis in the future on connectivity and wildlife corridors as part of Nature Recovery Networks – consider including reference to the creation of wildlife corridors in the policy.</p> <p>The Council’s Housing team has commented that they are aware of instances where inappropriate trees have been planted in small gardens and suggest there is reference in the Policy to ‘Tree species to be planted in agreement with Hart District Council’s tree officer’.</p>	<p>YDFNP3 - add this suggestion to end of paragraph 1.</p> <p>YDFNP3, paragraph 4 - add reference as requested.</p>
<p>Page 29 section on Built and Historic Environment</p> <p>See also comments below on SPD character areas – Map 10 – welcome clarity as to which areas are covered by Local Plan Policy ED4 and Yateley Village Centre SPD.</p> <p>To clarify application of the policy - Para 85 add map references for clarity - Yateley Green Conservation Area (Map 13) ; Cricket Hill Conservation Area (Map 11)</p> <p>To clarify application of the policy – Para 86 – add character areas listed to Map 10 as they are specifically referred to in Policy YDFNP5</p> <p>Correction - Para 89 3rd sentence Policy ED4 should read Policy ED6.</p> <p>To clarify application of the policy – Para 90 needs clarifying as to where main town centre uses will be encouraged – only within the area under the SPD or only within the area designated as a District Centre in the Hart Local Plan which post dates the SPD which was prepared in 2009.</p>	<p>No comment made.</p> <p>Paragraph 85 - add references.</p> <p>Paragraph 86 - add character areas.</p> <p>Paragraph 89 - change ED4 to ED6.</p> <p>Paragraph 90 - add reference to Hart Local Plan.</p>
<p>Policy YDFNP4 - To clarify application of the policy</p> <p>Bullet d) suggest reference is also added to refer to affordable housing being interspersed amongst market housing.</p>	<p>YDFNP4 - add suggested text.</p>
<p>Policy YDFNP5 - To clarify application of the policy</p> <p>See comments above on map references – need clarity as to application of the policy in relation to ED4 and ED6 of the Hart local plan and the SPD adopted in 2009.</p> <p>Bullet b) sub bullet c) architectural detailing add ‘and use of materials’ to read ‘architectural detailing <u>and use of materials</u>’.</p> <p>In the Western Entrance Character Area, development of the gateway site identified in the Hart Urban Characterisation Study will be supported which also: suggest ‘which also’ at the end of the sentence to be rephrased as ‘<u>where it also</u>’.</p>	<p>YDFNP5 - add reference.</p> <p>b) / c) – suggested wording agreed.</p> <p>Accept amended text.</p>

<p>and bullet h) Clarify with 'Respects the its role...'</p> <p>rephrase 5th para as 'In the Eastern Entrance proposals will be supported which maintain and where appropriate enhance the <u>visual amenity provided by predominance of trees</u>, hedgerows and boundary walls and maintain the semi-rural character of this area;</p> <p>Final para of policy insert ref to Map 17 which identifies flood zones.</p>	<p>Suggested wording agreed.</p> <p>No change. Original wording is clear.</p> <p>Agreed to add reference.</p>
<p>Page 37 Heritage Policies - Clarification</p> <p>Para 92 The last adopted conservation area appraisal for Darby Green is a 2011 document not a 2001 version. However, the 2001 version is the one that has been in the public domain – HDC are in the process of resolving this matter.</p> <p>Para 97 – map 12 the adopted 2011 appraisal includes a plan of the three character areas.</p>	<p>No change required.</p> <p>No change required.</p>
<p>Policy YDFNP6 - To clarify application of the policy</p> <p>First para - NPPF and Hart Local Plan refer to conserve not preserve, suggest also inserting '<u>character or appearance</u>' before '...the Conservation Areas.'</p> <p>Bullet b ; amend to read 'it protects the key views <u>within and of</u> the Darby Green....'</p>	<p>YDFNP6 – accept amended text.</p> <p>YDFNP6 - accept amended text.</p>
<p>Page 47 Green Infrastructure – clarification</p> <p>Map 15 Green Corridors – Blackwater Valley Path is difficult to distinguish in places on the map due to its proximity with the District/Parish boundary.</p>	<p>No change. The path runs close to the boundary and both are identified by different coloured lines. The map also can't be altered.</p>
<p>Policy YDFNP8 - To clarify application of the policy – reference to, <i>the only section of the whole Blackwater River from its source to its confluence where this has not been achieved. Could be added to the supporting text if deemed necessary.</i></p> <p>Policy 3rd para final sentence consider rewording to clarify the intention of this part of the policy:</p> <p><u>Delivery of additional riverside rights of way between Sandhurst Road and Mill Lane</u>, along the Blackwater River will be actively encouraged, particularly along the stretch between Sandhurst Road and Mill Lane, the only section of the whole Blackwater River from its source to its confluence where this has not been achieved.</p>	<p>No change. The detailed location information aids clarity.</p>

<p>Policy YDFNP9 - To clarify application of the policy</p> <p>Bullet f – query how is a minor new build defined? Suggest this is quantified in number of dwellings and/or site area/floorspace for non residential.</p>	<p>YDFNP9 – will quantify that minor build means fewer than 10 dwellings.</p>
<p>Policy YDFNP9 - to note comments from HDC Flood Risk Management Officer</p> <p>The Plan highlights the known flood risk accurately with good reference to local and recent flood events. The proposed Policy YDFNP9 – Flood Risk provides a reasonable request for developments and is in line with similar policies and information at National, County and District level.</p>	<p>Noted.</p>
<p>Para 146 section on Housing Mix/Affordable housing – update</p> <p>Consider adding reference to HDC Interim Planning Policy Statement on First homes adopted in December 2021</p> <p>Various detailed comments have been received from the Council’s Housing team these are set out in full at the end of this schedule.</p>	<p>Paragraph 146 – update whole para to read: Policy YDFNP12 below supports the delivery of affordable housing, on qualifying new development in line with National and local planning policies. This will apply to any redevelopment proposals and new build proposals in the Parish and if the proposal is for more than 10 dwellings then affordable housing will need to be provided in line with Local Plan Policy H2 and any <u>subsequent local and Government policy and guidance, such as Hart District Council’s Interim Planning Policy Statement on First Homes.</u></p>
<p>Policy YDFNP12 - To clarify application of the policy</p> <p>Clarify policy to ensure that affordable housing provision delivered on a site reflects the identified need rather than just smaller homes.</p> <p>See further detailed comments from the housing team at the end of this schedule.</p>	<p>YDFNP12 - Reword policy to read: New housing developments will be supported which make provision for high quality affordable housing, as well as smaller house types, to meet identified and evidenced local needs with off-site provision or a financial payment in lieu of provision only being made where this can be robustly justified. Development proposals for older persons accommodation will be supported where a need can be demonstrated.</p> <p>Reference to identified needs already included in the policy text.</p>

<p>Policy YDFNP13 - To clarify application of the policy</p> <p>Final sentence – consider land owner expectations/aspirations – is this part of the policy deliverable?</p>	<p>YDFNP13 - not appropriate at present time to consider future aspirations as land will revert to common land once airport activities cease.</p>
<p>Policy YDFNP15 - To clarify application of the policy</p> <p>Bullet a) query how this will be achieved particularly if a development has no control over the land in question. Suggest 'provides' is replaced with 'contribute to'</p> <p>Para 165 and the policy refer to Key Facilities – these are not defined anywhere – suggest this is added to the glossary for clarification.</p> <p>Bullet b) it is unclear as to what is envisaged by 'takes opportunities to connect to public and community transport provision'. Suggest this is rephrased along the lines of: 'opportunities to connect to public and community transport provision through improved pedestrian links will be supported.'</p>	<p>YDFNP15 – accept amended text.</p> <p>Paragraph 165 – agreed to add key facilities definition to glossary.</p> <p>b) Alternative amendment to wording: Encourages active travel through provision of footpaths and cycle lanes where these are not present.</p>
<p>Community Ambitions – Noted.</p> <p>Acknowledge these reflect a number of detailed comments made previously by HDC that fall outside the remit of the NP.</p>	<p>Add acknowledgement.</p>
<p>Detailed comments from housing team:</p> <p>Community Ambitions – Housing Team: involvement of Town Council in affordable housing negotiations and locations.</p>	<p>The Town Council's local knowledge would be beneficial for the successful delivery of affordable housing in the parish, and therefore, the Town Council would naturally expect to be consulted.</p>

15th February 2022