

Neighbourhood Planning
Corporate Services
Hart District Council
Harlington Way
Fleet
Hampshire
GU51 4AE

23 July 2019

Our ref: 1513

Your ref:

BY EMAIL ONLY TO: neighbourhoodplanning@hart.gov.uk

Dear Sirs

Crandall Parish Neighbourhood Plan, Submission Version - Representations for Millwood Designer Homes Ltd

Having reviewed the Submission Version of the Crandall Parish Neighbourhood Plan via https://www.hart.gov.uk/sites/default/files/3_Visiting_Hart/Towns_and_parishes/Crandall%20NP%20Submission%20Version%20June%202019.pdf, I have been instructed by my client to make a number of general and site-specific representations, as per the enclosed Representation Form; and as set out in this letter and the other documentation enclosed.

General Representations to the Neighbourhood Plan

Policy 2 - The Overall Quantum of Housing Proposed by the Neighbourhood Plan

Policy 2 of the Neighbourhood Plan proposes four housing allocations, totalling 42 dwellings. Site-specific representations to these allocations are set out in later paragraphs of this letter but my client has significant concerns that at 42 dwellings, the overall quantum of additional housing proposed by the Neighbourhood Plan is too low.

Indeed, paragraph 5.9 of the Neighbourhood Plan's Evidence Document of November 2018 concludes that the Neighbourhood Plan should not exceed the 66 dwellings originally allocated to Crandall by your Authority (the report dated 9 February 2017 to your Authority's Cabinet refers) but the Neighbourhood Plan undershoots this figure by 37%. This undershoot is excessive; and will not provide the amount, choice and opportunity of housing (including affordable housing) to meet the village's needs.

Accordingly, Policy 2 of the Neighbourhood Plan should confirm sufficient housing allocations to yield closer to 60 additional dwellings, in line with identified needs and closer to the upper limit for new housing in the village originally set by your Authority and endorsed by the Neighbourhood Plan's Evidence Document of November 2018.



Site-Specific Representations to Proposed Neighbourhood Plan Housing Allocations

Policy 2a – Land at St Cross Road, Crondall

Policy 2a of the Neighbourhood Plan describes this site as comprising an existing range of garages that currently serve the St Cross Estate; and as having the potential to accommodate "...2 small two to three bedroomed semi-detached properties..." with off-street parking and gardens. The Neighbourhood Plan does not explain how and to where the existing garages on the site would be re-provided, which would be necessary to maintain the overall level of parking provision serving the St Cross Estate, leaving aside the need for four parking spaces to serve the proposed allocation.

The site is tiny, constrained by its current use as domestic garages and has very limited potential to accommodate any new housing. The site's development would certainly not yield any affordable housing – it is at best a 'windfall site' and should be deleted from the Neighbourhood Plan as a housing allocation.

Policy 2b – Land at Mill Lane, North of the A287

This site lies on the northern side of the A287 and 'wraps around' the petrol filling station at the junction of Mill Lane and the A287. Policy 2b of the Neighbourhood Plan proposes the site's allocation for 32 dwellings, including affordable housing to the District Council's policy requirements.

This site is about as far removed from Crondall as it is possible to be, and residents would be cut off from the village by the busy A287. In all probability, residents would not bother to access facilities and services in Crondall – they would instead drive to Odiham or Hook, encouraging unsustainable travel and doing nothing to support or enhance services and facilities in Crondall. In fact, the village would benefit very little from the site's development.

In short, the site is in a particularly unsustainable location and relates poorly to any settlement. Indeed, the site's development would lead to a highly inappropriate, unsustainable and damaging consolidation of an existing scatter of sporadic development in the District's open countryside. The site's allocation should be deleted from the Neighbourhood Plan.

Policy 2c – Land at The Bungalow, Pankridge Street, Crondall

This site lies adjacent to Crondall's Conservation Area and comprises a small bungalow and its rear garden, accessed off a narrow accessway serving a number of other properties. Policy 2c of the Neighbourhood Plan proposes the site's allocation for a pair of 1½ storey semi-detached dwellings with off-street parking and gardens, to replace the existing bungalow on site. As such, Policy 2c in reality allocates the site for just one additional dwelling.

I would seriously question the suitability and appropriateness of the site's proposed allocation. The site is tiny – far too small to accommodate a pair of semi-detached bungalows, with off street parking and gardens, which would in any event have a serious impact upon the existing bungalow on site and neighbouring properties. The site's development would certainly not yield any affordable housing – at best it may have the potential to accommodate a single dwelling as a 'windfall' proposal and on this basis, the site should be deleted from the Neighbourhood Plan as a housing allocation.

Policy 2d – Land at Marsh Farm, Bowling Alley

Land at Marsh Farm is currently in employment uses and operates as the Marsh Farm Business Centre, offering a number of units to small businesses – at least 8 small businesses are currently listed as operating from the site. The Marsh Farm Business Centre lies in a rural location remote from Crondall and is proposed as a housing allocation for seven dwellings.

The Neighbourhood Plan does not put forward any proposals to secure the relocation of the businesses currently operating from the site to facilitate the delivery of its housing allocation. Indeed, it would be wholly inappropriate for the Neighbourhood Plan to facilitate the loss of a rural employment site in the Parish – it is good planning practice to balance provision of new homes with employment opportunities instead, particularly within and adjacent to rural settlements, to reduce out-commuting for work.

Furthermore, the site's allocation and development for just seven dwellings would not yield any affordable housing for the village and would comprise sporadic and unsustainable residential development in the District's countryside, wholly contrary to planning policy and good planning practice. The site should therefore be deleted from the Neighbourhood Plan as a housing allocation and protected as an employment site for small businesses – indeed, there is no reason why the Neighbourhood Plan should not actively encourage or facilitate improvements to the site's employment 'offer'.

Area-Specific Representations

Policy 4 - Local Gap to the North of Crondall

Policy 4 of the Neighbourhood Plan proposes a 'Local Gap' between the existing northern edge of Crondall and the A287. The extent of the 'Local Gap' is set out diagrammatically on an Ordnance Survey Extract at Figure 14 of the Neighbourhood Plan and is justified within Policy 4 to prevent "...visual coalescence, excessive development or...damage [to] the integrity and distinctive identity of the adjacent settlements [of] Crondall and Mill Lane..."

There is no Policy or precedent for the proposed 'Local Gap' in the adopted or emerging District Local Plan and the justification put forward in the Neighbourhood Plan is simply untenable: the southern edge of the sporadic collection of development described as the 'settlement' of Mill Lane lies out of sight over a kilometre to the north west of Crondall, across undulating countryside and tracts of ancient woodland already protected under existing countryside planning policies.

There is no prospect of Crondall merging with Mill Lane, even if the wholly unsuitable and unsustainable housing allocation proposed by Policy 2b of the Neighbourhood Plan were to proceed. This explains why a Local Gap between Crondall and Mill Lane/the A287 has never been a Policy of your Authority. Indeed, it is hypocritical and inconsistent (and not least unsustainable) for the proposed housing allocation off Mill Lane, to the north of the A287, to 'leapfrog' the proposed Local Gap to lie on its northern edge, consolidating an existing scatter of sporadic development in the District's open countryside to the north of Crondall.

A Neighbourhood Plan must be prepared to be in general conformity with the Policies of its 'parent' Local Plan. There is no Local Plan Policy or otherwise sensible local planning precedent or justification for the 'Local Gap' proposed to the north of Crondall by Policy 4 of the Neighbourhood Plan; and the Neighbourhood Plan's Evidence Document of November 2018 similarly fails to put forward any cogent planning, development or landscape-related justification for the proposal. In short, the 'Local Gap' is a contrivance that does not serve any valid or useful planning purpose. The 'Local Gap' should accordingly be struck from the Neighbourhood Plan and Policy 4 deleted.

Site-Specific Representations in respect of Sites SHL73 and SHL74, to the West and North West of Crondall

Sites SHL73 and SHL74 were the only sites shortlisted by your Authority as meriting further consideration in order to meet a need for 66 dwellings in Crondall – please refer to the enclosed extract from the New Homes Sites Booklet published by your Authority in November 2015, as part of public consultation on the 'Refined Options for Delivering New Homes'. My client has a controlling interest in both sites and representations relating to each are set out below.

Site SHL73 - West of Crondall

This site lies adjacent to the western edge of Crondall, to the rear of existing properties on Itchel Lane and Pankridge Street to the south and east respectively. The site is contained by a block of woodland to the north and by land that falls away towards Hyde Lane to the west.

My client regards Site SHL73 as having the potential to yield the following:

- A development comprising exclusively of affordable housing, at the village's edge on the northern side of Itchel Lane. This location would be within easy reach of services and facilities in Crondall; and services and facilities further afield could be reached along Itchel Lane and Hyde Lane towards the A287, without having to travel through the centre of Crondall.

- My client could gift the Parish Council completed affordable homes for those in housing need: there would be no need for the Parish Council to develop the affordable homes itself.
- The remainder of the site would remain open and undeveloped.

The site's development would take place in a sustainable location relative to services and facilities in Crondall; would not harm the village's Conservation Area or wider landscape setting; and would deliver a significant benefit to the village, in the form of affordable housing that could be gifted to the Parish Council. The site should be allocated under Policy 2 of the Neighbourhood Plan on this basis.

Site SHL74 – Land North West of Crondall

This site lies on the northern edge of Crondall, adjacent to housing on Lefroy's Field. The site is well contained by woodland screening on the remainder of its boundaries and it is certainly difficult to glimpse in views from public vantage points. My client has the legal means to introduce a safe and satisfactory access to the site from Lefroy's Field – indeed, there are no legal or technical obstacles that would prevent the site's development. For example, technical studies undertaken for my client have established that the site is not at risk of flooding and that its development would neither lead to nor exacerbate any incidences of flooding elsewhere.

In addition to being shortlisted by your Authority with Site SHL73 as one of only two sites meriting further consideration in order to meet a need for 66 dwellings in Crondall, Site SHL74 is included within the District's current February 2018 Strategic Housing Land Availability Assessment (SHLAA) as an available, suitable and deliverable housing site. The relevant extract from the 2018 SHLAA is enclosed and Site SHL74 is well capable of being able to meet a need for around 60 dwellings in Crondall (including affordable housing) on a single, sustainable allocation under Policy 2 of the Neighbourhood Plan.

My client and I have met with Parish Council representatives in the past, making available a Concept Masterplan Document and Illustrative Site Layout, as enclosed herewith. The Illustrative Site Layout demonstrates that the site could be developed with around 55-60 dwellings, ranging from 1 bedroom apartments, to 2 bedroom starter homes and 3 and 4 bedroom family dwellings (which would include bungalows and other dwelling types and sizes suitable for the elderly and downsizers); affordable housing for local people; a significant area of public open space on the northernmost part of the site, adjacent to properties on Hyde Lane; enhanced public footpath links; and connections between areas of new public open space and the village's Scout Hut and the woodland that lie adjacent to the site's eastern and western boundaries respectively. The public open space shown on the Illustrative Site Layout would remain as such in perpetuity; and could be gifted to the Parish Council.

The site's development along the principles shown on the enclosed Illustrative Site Plan would form a logical and contained extension to Crondall, which would in no way lead to its coalescence with scattered rural development further to the north of the village. The site's development would furthermore have no effect on the village's Conservation Area or wider landscape setting; and traffic generated by the site's development would have a minimal effect on roads through the village – the site is within easy walking distance of services and facilities in the village centre, along a continuous pavement; and services and facilities further afield could be reached conveniently and safely along Pankridge Street to the A287 and beyond, without having to travel through the village.

It is also important to bear in mind that the economies of scale from delivering around 55-60 dwellings in Crondall on Site SHL74 would maximise the delivery of affordable housing, public open space, financial contributions and other benefits for the whole village (such as enhanced broadband connections), which would not accrue from the Neighbourhood Plan's current approach of proposing the allocation of much smaller sites scattered around the village. Delivering around 55-60 dwellings on Site SHL74 as opposed to much smaller sites scattered around the village would also minimise change in the village and the impact of such change on its Conservation Area.

Concluding Comments

My client is ready, willing and able to work with your Authority and the Parish Council to deliver the development of Site SHL74 through the Neighbourhood Plan. The site is suitable, sustainable, available and deliverable; and the economies of scale that would be realised through its development would maximise provision of affordable housing, open space and other public benefits.

My client is furthermore ready, willing and able to work with your Authority and the Parish Council to deliver on part of Site SHL73 a development comprising exclusively of additional affordable housing, with the remainder of the site kept open and free from development, to protect the village's landscape setting and Conservation Area from the west.

As such, I trust you will find this letter and the enclosed helpful and that my client's representations will be taken account of and acted upon at the Neighbourhood Plan's Examination. I will therefore look forward to hearing from you in due course – please contact me in the meantime if you have any queries with this letter, or if you need to discuss any matter in more detail.

Yours faithfully
for MatPlan Limited

Matthew Utting BSc(Hons) DipTP MRTPI
Director

Encs.

Copy: Mr C Pitchford, Associate Land Director, Millwood Designer Homes Ltd