

Throughout the document when comments have been made by many parties that raise objections to site selection the comments back from Crondall Parish Council are words to the effect that Crondall Parish are unwilling to review any further aspects of any other sites.

One of the PRIME requirements of such a planning process is that at this early stage ALL sites should be evaluated fairly and scored objectively against all the criteria - THAT has not been the case. Once a site was discounted it was NOT then re-evaluated against the scoring criteria which in themselves were in a development stage. So any early offered sites that were discounted via Crondall resident's votes as being not viable were never then subjected to any professional review by subject matter experts – so therefore Crondall Parish Council did NOT carry out any further review process to ensure they were still able to be discounted at a later stage after being professionally reviewed.

Statements have been made on flooding have been mentioned by 'locals' which have NOT been substantiated by any professional experts and Crondall Parish have used 'local knowledge' that selected areas in the village or surrounding areas flood without understanding or reviewing any possible mitigation factors that might be used to alleviate such flooding.

Not being willing to re-evaluate sites have therefore forced Crondall Parish to discount local sites both within the village boundaries and close to the boundary in favour of sites by the Mill Lane clutch of houses that are at least ½ mile away from any such village facilities. Mill Lane site has also been classed as 'green field', while other sites which are registered by Hart District Council as brown field have strangely been discounted.

This does NOT make sense. Brown field, part brown field sites should be scored much higher than green field sites and this itself highlights a considerable failing of the scoring system used by Crondall Parish Council NPWP.

www.crandall-pc.gov.uk/file/2019/06/Crandall-NP-Local-Survey-Process-and-results_v0.4_06092017.pdf

In question 29 of the above document – **Are there any sites in the parish that you think could reasonably be used for development?**

Highest score was Mill Lane – SHLAA 179 - a green field location and 'a distance' outside Crondall Village itself – a location that is highly debatable as being sustainable and both alongside a very busy A road and a junction that has suffered many accidents. Any persons wishing to use any facilities within the village, church, playing fields, shops, pubs school would have to use a car.

Next Highest Score – Old Parsonage Meadow - SHLAA 76. Small green field are within the centre of the village not used for anything

Next Highest score - Land North of Crondall – SHLAA 74 - now allocated within the NP as a green gap – Woods and green fields. Alongside existing housing and Scout hut. Green Field development

Next Highest score – Broden Stables – SHLAA 178 joint fourth but put above Well Road south as Broden Stables score 3rd highest on the 1st choice for any placed development. It is also registered with Hart District Council as a Brown Field development site.

The omission of Broden stables for further consideration is a clear indication that the site selection process is flawed. A total of 23 people voted Broden stables to be considered as a site for development **and a further 27 people voted for any type of Brown Field development** – as a total that 50 potential votes in favour of Broden Stables.

Broden Stables is a potential brown field Hart District Council recognised development site that was identified to both Hart District Council and Crondall Parish in 2015 and subsequent scoring by Crondal Parish on items such as flooding, access and outside the village boundary therefore gave reason to discount the site. Subsequently Hart District Council themselves evaluated the site and found it suitable for the following common ground reasons.

Common ground On the basis of the contents of the Committee Report, the reasons for refusal, and discussions with officers during the course of the application, we understand that the following points are not in contention:

- The relevant policies are those in the Hart Local Plan 1996 and saved policy NRM6 from the South East Plan 2006 – work has started on the development of a new local plan for Hart and a neighbourhood plan for Crondall, but these are at an early stage and were not given any weight in the refusal of the application;
- Crondall is considered a sustainable enough location for new housing growth (ref p.32 of com report);
- Part of the site is previously developed land by virtue of its use as a stables (ref p.17 of com report);
- The application was not refused because it was outside of the settlement boundary, but because of the concerns relating to impact on the setting of the countryside (ref p.31 of the com report and Reason 2);
- There is no objection to the principle of residential development on the site (ref p.43 of the com report and Reason 2);
- There is no objection to the density of the development in terms of numbers, but the concerns relate to the scale and layout of the development and the effect these have on the countryside and conservation area (ref Reason 1);
- There are no specific landscape designations or identified important views that apply to the site (ref p.33 of the com report);
- The proposed housing mix is acceptable (ref p.33 of com report);
- The proportion, tenure split and location of the affordable housing is acceptable (ref p.33 of com report);
- The agreed off-site highway works would make the scheme satisfactory in highway terms (ref p.19 and p.37 of com report);

- The development would not have an unacceptable impact on residential amenities (ref p.37 of com report);
- The development would not have an unacceptable impact on the Public Rights of Way that border the site (ref p.23 and p.38 of the com report);
- The development would not have an unacceptable impact on flood risk and drainage (ref p.39 of com report);
- The application was not refused on the basis of impact on trees within the application site, but because of the uncertainties surrounding the impact on trees outside the site boundary (ref p.40 of com report and Reason 3);
- Subject to securing the proposed mitigation measures, the development would not have an unacceptable impact on biodiversity/ecology (ref po.40 of com report);
- The applicant has secured SANG mitigation and made a SAMM payment and would therefore not be unacceptable in terms of impact on the Thames Basin Heaths Special Protection Area (ref p.41 of the com report).

NONE of these points agreed between the developers and Hart District Council were thereafter reviewed and accepted by Crondall Parish as to allow a change in status of the Broden site. Rather letters were raised to the local MP requesting delays to the planning to process to allow the Crondall Parish NP to come into effect to halt this development were sent by local parish members.

Following this an appeal was raised and planning was approved by the planning inspectorate. Subsequently quashed on a high court appeal for the single reason of the lack of an appropriate assessment. All other points were dismissed by the high court.

This decision itself should therefore lead Crondall Parish Council to once again review Broden Stables as a site for development – however they have NOT considered doing so.

The following question – same document - Q30 Are there any sites in the parish that you think should NOT be used for development?

This graph now throws up multiple questions – Old **Parsonage Medows SHLAA 76** - which scored second highest as a site to be developed now scored highest for a site that **should NOT be used for development.**

The **Mill Lane SHLAA 179** site now scores one of the lowest – and probably the only people voting against the Mill Lane site are the handfuls of people that actually live there – while the residents of Crondall Village en-mass all now seem say we want the development out by Mill Lane.

The process used in these questions and graphs is totally flawed and subjective to very local and personal views and the personal feelings of the people taking the assessment. NO professional planning people have been involved in the process for site selection.

As mentioned in the questionnaire raised and published by Crondall Parish Council replies to previous questionnaires – turkeys do not vote for Christmas. Mill Lane residents can and have voted

against the proposed development at Mill Lane but their 'small' number does not count against the larger Crondall Village residents number. Who DO NOT want to see a development of any size adjoining or near to the boundary of Crondall village. It is plainly not possible to achieve the Hart District Council housing targets within any of the permitted village boundaries (Mill Lane or Crondall) so therefore put the houses as far as possible away from Crondall itself.

ALL major sites on offer and consideration would therefore fail BOTH Hart District Councils and Crondall Parish Councils own stipulation of being within a village boundary.

ALL sites should be assessed against planning merits and policies and not personal, financial and local gain/loss. Within the original score set inconsistencies arise against Broden Stables as shown below against CPC original scores and NOT subsequently reviewed since -as listed below.

	Original Score	Suggested score	Comments
Access -	-1	1	This is not challenged.
Infrastructure -	-1	1	This is not challenged.
Sustainability	0	1	It is on the village boundary with footpath access to main community services etc. It is closer than the Mill lane site which is scored at 1.
Brownfield	-1	0	The site is partially previously developed land Rural Impact -1 1 See inspector's comments
Flood Risk	-1	1	SUDS proposed will reduce run off from existing levels.
Settlement Area	-1	0	ery close to village boundary
Conservation	-1	1	See inspector's comments
Local Gaps	1	1	Agreed - No change
Green spaces	1	1	Agreed - No change
Social Contribution value	1	1	Agreed - No change
Total	-4	9	Ranked equal top (1=) from 21

The subjects mentioned above raise considerable doubt that the Crondall Neighbourhood Plan is one that has true planning substance behind it. Policies that they themselves have aligned to show that sites that have been already de-selected actually match most policies and partly align with the remainder. **BUT Crondall Parish are NOT willing to then revisit these sites to carry out any further reassessment.**

Policy Number	Comment
2.4	We disagree with the proposal to treat the allocation of 66 homes to the parish of Crondall as 'very much an upper limit'. This is inconsistent with national policy. Paragraph 59 of the National Planning Policy Framework maintains that it is the Government's stated objective to significantly boost the supply of housing.

	<p>We note the target of providing 38.5% of the housing as social housing and that the acknowledgement that larger sites are needed to provide social housing, as smaller sites will not be subject to the policy requirement.</p>
<p>Policy 1</p>	<p>We agree with the focus for growth on the settlement of Crondall. This is consistent with its designation as a Main Village in the settlement hierarchy in the Hart Local Plan. The village is a sustainable location for growth as it</p> <p>However, we disagree with the reference to focusing growth on Mill Lane. This is inconsistent with the settlement hierarchy in the Hart Local Plan (both adopted and emerging). Mill Lane is not identified within this hierarchy. It does not provide the same degree of access to services and facilities and is an unsustainable location to focus growth. This approach is inconsistent with the Local Plan, inconsistent with national policy, and unsupported by evidence.</p> <p>For these reasons we disagree with the proposal to extend the settlement boundary of Mill Lane. The extension of Mill Lane should not be prioritised over the extension of the much larger settlement, and more sustainable location, of Crondall.</p> <p>We note that development within the settlement boundary is supported, but that the draft policy gives priority to protecting the Conservation Area and the views in and out of the Conservation Area. Given the extent to which the conservation boundary covers much of the existing settlement of Crondall, this means that the Neighbourhood Plan must actively search for sites within and adjacent to the settlement boundary where growth could be accommodated in a way that would not have an adverse effect on the character of the conservation area.</p> <p>We agree with the support for development of brownfield sites where consistent with national policy.</p> <p>We agree with the limited support for development outside settlement boundaries where there is no harm to the character of the countryside and where consistent with local policy.</p> <p>We disagree with the supporting text which states that “Proposals for development that result in “creeping” expansion of the settlement boundaries will be strongly resisted.” This fails to recognise that sites adjacent to the settlement would be inherently more sustainable locations than isolated sites that are removed from the settlement.</p> <p>Instead, the supporting text should refer to the tests that would be applied that would be consistent with local and national policy. These would relate to assessing any proposals against the impact on the character of the countryside.</p>
<p>Policy 2</p>	<p>We strongly disagree with the selection of sites to deliver additional homes. Policy 2 identifies five sites for the delivery of new homes. Of these, two are located outside of the settlement of Crondall, and the three within the village are small infill sites that would provide a cumulative total of eight new homes. This means that only eight new homes are planned in a sustainable location within the village, and the majority of those planned are located in unsustainable locations away from the village. As a result of the proposed homes within Crondall being delivered on small isolated sites, they will also not trigger a requirement for affordable homes. This means that no affordable housing would be delivered within Crondall over the life of the plan through these allocations.</p> <p>The proposed approach to deliver 83% of the allocated homes in locations outside</p>

of Main Village of Crondall is inconsistent with the settlement hierarchy in the Hart Local Plan, and inconsistent with national policy.

We propose that SHL178 Broden Stables is allocated for 30 homes. This would be consistent with the planning permission granted for the site. The decision to exclude Broden Stables is unjustified, as it is based on a site assessment that is fundamentally flawed. The supporting documents provided with the planning application for this site, the comments of experts at Hampshire and Hart Councils, and the conclusions of the Inspector in granting the planning permission, provide evidence to contradict the site assessment for Broden Stables.

This is summarised below:

- **Access** – given a score of -1. This is not supported by evidence. The Transport Assessment demonstrates that the site could be accessed safely and would not have an adverse effect on highway capacity or highway safety. This was endorsed by highways officers at Hampshire County Council and Hart District Council. The Inspector concluded “*It is noted that the Council’s highways consultee raised no objection to the proposed development subject to planning conditions. The appellant’s trip generation data was considered accurate and its assessment conclusions in respect of likely traffic impact and the ability of local roads to accommodate flows without adverse impact is convincing. It was also considered that the issue of car parking accorded with Council guidelines. The proposals indicate that the footpath running along the northern boundary would be improved to provide minimum 900mm width. Accordingly, I find no reason to oppose the Appeal Scheme on highway or transport grounds.*” (paragraph 31). On the basis of the evidence this score should be 1.
- **Infrastructure** – given a score of -1. This is not supported by evidence. The planning application was supported by a Utilities Report that demonstrated that the necessary utilities could be connected to the site. There was no objection from Hart District Council, Hampshire County, Thames Water, or the appeal Inspector on this basis. On the basis of the evidence this score should be 1.
- **Sustainable location** – given a score of 0. This is not supported by evidence. The Inspector stated “*The Council, by its own admission, confirms that the appeal site is relatively sustainable. Whilst the proposed development is partly in conflict with LP Policy RUR2, it would supply 30 no. of dwellings at a site which is visually and functionally well located to the village and include 40% of much needed affordable housing in an area of high housing demand. Along with the provision of on-site open space and provision of a financial contribution towards off-site public open space facilities, I find that these comprise a substantial social benefit.*” (paragraph 44). On the basis of the evidence, this score should be 1.
- **Previously development land** – given a score of -1. This is not supported by evidence. Hart District Council stated that the site was partially previously developed land in the committee report, and this was also included in the appeal statement of common ground. The Inspector stated “*The appeal site comprises in part previously developed land consisting of a stabling block and associated hardstanding/parking together with a riding arena, which has floodlighting amounting to some 1.41 hectares*” (paragraph 14). On the basis of the evidence, this score should be 0.
- **Rural impact** – given a score of -1. This is not supported by evidence. The Landscape Assessment demonstrates that the impact on the character of

the landscape and countryside would be minimal. The Inspector concluded that *“the development as proposed would not have a significant detrimental effect on the character and setting in the manner set out in LP Policy RUR 2 and its design in terms of scale, form, character, layout and landscaping would comply with LP Policies GEN 1, GEN 3 and GEN 4 which in combination seeks to ensure that development respects and responds to local landscape character and urban design qualities”* (paragraph 23). The Inspector also concluded *“I have found that the proposals would not have a significant detrimental effect on the character and setting of the countryside at this location”* (paragraph 44). On the basis of the evidence this score should be 1.

- **Flood Risk** – given a score of – 1. This is not supported by evidence. The Flood Risk Assessment demonstrates that the development would be safe from the risk of flooding and would not increase the risk of flooding elsewhere. This was endorsed by officers at Hampshire County Council and Hart District Council. The Inspector concluded *“It is acknowledged that localised flooding problems have occurred and the various agencies have been closely involved during the application process as described in the officer report. No robust technical evidence has been provided that would suggest that the drainage proposals together with the mitigation that is proposed following negotiations with statutory undertakers would not provide an acceptable drainage solution. I am therefore satisfied that the measures proposed, including betterment would not lead to an unacceptable risk of flooding within or indeed in the immediate local area of the site and therefore the development would satisfy the requirements of LP Policy GEN11 (paragraph 33).”* On the basis of the evidence this score should be 1.
- **Settlement area** – given a score of -1. Although outside the settlement boundary, the site is adjacent to the settlement boundary. In the committee report, Hart District Council described the location as *“a relatively sustainable location on the edge of the rural village”*. On the basis of the evidence, this score should be 0.
- **Conservation** – given a score of -1. The Planning and Heritage Statement concludes that there would be no adverse effect on the character of the conservation area or listed buildings. The Inspector concluded *that the overall minor change to the setting of the Crondall Conservation Area would not be harmful to the significance that I have identified. It would therefore comply with the LP Policy CON 13. The Council has not provided any substantive or convincing evidence that the proposed development would affect the setting of nearby listed buildings most notably Willow Cottage on Redlands Lane. From my own assessment, it is quite inconceivable that there would be any harmful effects arising from the appeal scheme on the setting of Willow Cottage or indeed any other listed building identified in the appellant’s heritage assessment and therefore the proposed development would comply with LP Policy CON 13 in this regard also. Consequently, I am also satisfied that my duties under section 66 of the 1990 Act have been discharged”* (paragraph 26). On the basis of the evidence, this score should be 1.
- **Local Gaps** – given a score of 1. Agree.
- **Green spaces** – given a score of 1. Agree.
- **Social contribution value** – given a score of 1. Agree.

	<p>We enclose the following documents as supporting evidence:</p> <ul style="list-style-type: none"> • Appeal decision APP/N1730/W/17/3185513 • Planning and Heritage Statement prepared by Indigo Planning, incorporating Affordable Housing Statement; • Heritage Statement; Infrastructure Provision Statement; Statement of Community Involvement; and Sustainability Appraisal • Planning Statement Update prepared by Indigo Planning; • application drawings prepared by Mountford Piggott Architects • Design and Access Statement prepared by Mountford Piggott Architects • Edge of Village Design Analysis prepared by Mountford Piggott Architects; • CGI of proposed development; • Photos of Redlands Lane; • Transport Assessment prepared by TTP; • The following flood risk documents prepared by RSK: Flood Risk Assessment August 2016; RSK Response to Hart District Council Comments December 2016; RSK Response to Hampshire County Council Comments December 2016; Flood Risk Addendum July 2017 prepared by RSK; Flood Risk Update November 2018 • Contamination Preliminary Risk Assessment prepared by RSK; • Utilities Report prepared by RSK; • Update Ecological Report prepared by Aspect Ecology, incorporating Habitats Regulation Assessment • Energy Statement prepared by GDM; • Landscape Statement prepared by Terra Firma; • Landscape drawings prepared by Terra Firma: • Arboricultural information prepared by Bernie Haverson: <p>The site scoring assessment has clearly been undertaken on a very high level using judgement rather than evidence. Now that clear objective and independent evidence is available, it would be perverse and irrational to ignore this. The site assessment must be re-run to provide an accurate assessment. It is clear from the above summary and the conclusions of the Inspector that Broden Stables would be one of the highest ranking sites available.</p> <p>The Strategic Environmental Assessment only assessed sites that had a positive score in the Parish Council's initial site scoring assessment. The evidence in the planning application documents and appeal decision demonstrates that the initial site scoring assessment of Broden Stables is fundamentally flawed, and that a proper assessment that is based on this evidence would give the site a high ranking. Therefore it is imperative that the Strategic Environmental Assessment is updated to include an assessment of Broden Stables, having regard to the evidence now available.</p> <p>Broden Stables would provide 30 new homes in what is recognised as a sustainable location and an area of high housing need. Of these, 12 homes would be affordable, in an area with a low proportion of affordable (only 12% of the housing stock is affordable, and only 1% of the total housing stock is shared ownership). In the context of the comparative failure of the proposed allocations to deliver any affordable housing within the village of Crondall, there is a clear and compelling case for Broden Stables to be allocated.</p> <p>The Inspector concluded: <i>"I find that the adverse impacts of granting planning permission would not significantly and demonstrably outweigh the benefits of the proposed development when assessed against the policies in the Framework as a whole and that the proposal represents sustainable development."</i> (paragraph 48).</p>
Policy 2a	This is a small infill site which would appropriately come forward as a windfall site, rather than an allocation.

	As a small site, it would not deliver any affordable housing.
Policy 2b	<p>There is no objective assessment on which the site at Mill Lane is favourable when compared with the site at Broden Stables:</p> <p>The Mill Lane site:</p> <ul style="list-style-type: none"> • Is outside the settlement boundary (but has been given a score of 1 for settlement boundary, compared with -1 at Broden Stables); • Is adjacent to a lower order settlement within the settlement hierarchy in the Hart Local Plan (but has been given a score of 1 for sustainable location, compared with 0 at Broden Stables); • Has a poorer accessibility to local services and facilities by virtue of being a small settlement (but has been given a score of 1 for sustainable location, compared with 0 at Broden Stables); • Like Broden Stables it is only partially previously developed land, with Hart District Council's site assessment noting that 'the majority of the site is on grade 4 agricultural land' (but has been given a score of 1 for previously development land, compared with -1 for Broden Stables). <p>With the introduction of substantial evidence demonstrating the suitability of Broden Stables as a housing site, it would be perverse and irrational to allocate Mill Lane and not Broden Stables.</p>
Policy 2c	<p>This is a small infill site which would appropriately come forward as a windfall site, rather than an allocation.</p> <p>As a small site, it would not deliver any affordable housing.</p>
Policy 2d	<p>This is a small infill site which would appropriately come forward as a windfall site, rather than an allocation.</p> <p>As a small site, it would not deliver any affordable housing.</p>
Policy 2e	<p>This is</p> <p>As a small site, it would not deliver any affordable housing.</p>
Policy 7	<p>This policy states "<i>Protect and enhance the rural views, vistas and street scenes within, into and out of the Parish. These views include (but are not limited to) the "Important Views" shown in Figure 24 below</i>". By definition, the identified 'important views' are of a higher degree of importance, and the policy should make it clear that more weight will be given to the protection of identified 'important views'.</p>