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Ref: Crandall Neighbourhood Plan –
Independent Examination
Date: 27th September 2019

By E-mail to Christine Tetlow – HART DC

Mr Nigel McGurk
Independent Examiner
Crandall Neighbourhood Plan Examiner
Erimax – Land, Planning & Communities

Dear Mr McGurk

RE: Crandall Neighbourhood Plan Examination, Request for Clarification from the Examiner

Crandall Parish Council is pleased to provide responses to your questions. We believe the attached paper answers each question that you raised. In some cases, we have referenced external, publicly available material and associated evidence. These are provided as web-links. Should you have any issues with this and require copies of these documents, we would be pleased to provide them.

We note the extensive comments under Regulation 16 consultation and have attempted to respond to the more general issues in section 2.2. However, if you require a more detailed response, a separate response to the individual comments is also submitted at Annex A.

Should you have further questions or wish to discuss any issues with the Parish Council's representatives, I would be happy to arrange this.

Yours sincerely,



Mary Harris
Assistant Clerk, Crandall Parish Council

CC. District Cllrs Dorn, Kennett, Crookes
Hart District Council: E. Whittaker, K. Bailey

Requested Responses

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Note on Referenced Documents

Key Appeal decisions have been provided as appendices. Additional referenced documents are assumed to be in the possession of the Inspector (e.g. original application and key Hart Policies). If the Inspector has any trouble locating any references, the Clerk to Crandall Parish Council would be pleased to provide them by return email.

1 European Obligations

Matter for clarification by Hart District Council, 2 Subject to the removal of the word "either" from Neighbourhood Plan Policy 2e.

Taking the above into account, please can Hart District Council confirm that it is satisfied (or is not satisfied) that the Neighbourhood Plan is compatible with European obligations.

Although no response is sought, CPC has no issues with the removal of "either" from policy 2e.

2 Comments on Regulation 16 Representations

Optional Response from Crondall Parish Council

Consequently, whilst not a requirement, I confirm that, in responding to this letter, there is an opportunity for Crondall Parish Council (CPC) to comment on any of the representations made during Regulation 16 consultation, should it wish to do so.

CPC welcomes to the opportunity to comment on the Regulation 16 representations.

2.1 General

Many of the responses received are very similar to those received at Reg 14. These were thoroughly reviewed with expert consultancy support¹. Although some responses did lead to changes, many were felt to be inappropriate and did not justify changes to the NP as drafted. Despite the responses being published², some commercially driven objectors have continued to repeat similar lines of objection. The majority of the Reg 16 consultation comments fall into the category of re-submissions.

In particular we note a significant and coordinated set of inputs from: Mr Edgerly, Indigo Planning Ltd, Pelican Developments, Crondall Developments Ltd and Dennis Jones who have been promoting a highly controversial site (CRON 02) Broden Stables Redlands Lane since 2015. It will be noted that their objections to the NP are largely verbatim of each other. To set them in context, the Examiner should be aware that their successful Appeal was quashed by the High Court³ in August 2019 and their 2016 application is due to be re-determined by Inquiry in Nov 2019.

The examiner may also note that almost all of the Reg 16 submissions are from developers seeking to promote their particular piece of land. If there are any very specific points that cause the Examiner any concerns, that have not been addressed below, CPC would be pleased to respond to them.

We are conscious that the Examiner wishes to see a succinct list of points and have therefore summarised the main or key issues in the following section, where they have not been addressed in response to the Examiners own questions. However, these responses are drawn from a more detailed point-wise assessment of the Reg 16 comments that is also submitted at Annex A.

¹ See: https://www.crondall-pc.gov.uk/file/2019/06/Crondall-NPWG-Reg14-Consultation-Results_v0.4_05052019.pdf

² [Crondall NPWG Reg14 Consultation Results](#)

³ *Crondall Parish Council vs Secretary of State and Crondall Developments Ltd*[2019] EWHC 1211 (Admin) CO/3900/2018

2.2 Key Representation Points

No.	Issue	Response
1	Claims concerning sites outside the village	The NP is a parish-wide undertaking and the NPWG has been very clear that it should consider the wider parish and not just the village of Crondall
2	Expected resident walking distances	Local experience is that residents drive even quite short distances within Crondall village and hence distance is not an impediment to engagement with the social activities in Crondall village. This is supported by: "Local Cycling and Walking Infrastructure Plans, Technical Guidance for Local Authorities" (Gov 2017) which states on page 25 (section 6.15) that ~400m is a realistic guide to Core Walking Zones.
3	Local Plan policy on Local gaps	The Hart Local Plan policy justification for the Local Gap was taken from Policy NBE2 and para 277: " <i>Through Neighbourhood Plans it is open to local communities to define existing and/or designate new Gaps</i> ". However, it is noted that policy NBE2 was removed by the Local Plan Examination ⁴ Major Modification MM82, with MM84 explicitly adding: - " <i>Development in the countryside between settlements can reduce the physical and/or visual separation of settlements. Development that would result in a perception of settlements coalescing, or which would otherwise damage their separate identity, will be refused. Both the individual effects of any proposals and the cumulative effects of existing and proposed development will be taken into account. Policies to designate specific areas or 'gaps' between settlements can be prepared through subsequent Development Plan Documents and Neighbourhood Plans.</i> "
4	Local Gap Representations	The proposed Local Gap has been reduced in size and re-drawn on natural boundaries between the two settlement areas, subsequent to Regulation 14 feedback. The principle of the preferred location of the Gap, to the north of the village, was established as part of the questionnaire feedback data from residents and reaffirmed after the sites consultation in October 2017 where 79% directly supported the proposal. The numerous applications for development within the Gap over recent years (Evidence Document 3.6 Page 24 https://www.crondall-pc.gov.uk/file/2019/06/Crondall-NP-Evidence-Document-June-2019.pdf) underwrite the Parish Council's concern regarding coalescence of these two settlements. Representations and counter proposals (to re-draw the Gap around a development site, or in an isolated space between the settlements) have been made to remove or alter policy 4. In all cases, these appear as attempts to gain favour for development on sites already refused by HDC.
5	Site Scoring	Many of the comments raised relate to the detailed site scores. The Parish Council and NPWG have maintained a very clear and well-evidenced Site Selection process. The simple 3-level scores do not try to differentiate between issues that are mildly negative or extremely negative (or positive). This is based on other successful local NP processes and reports of other NPs using excessive complexity leading to extended debates about the degree of a specific score. Eleven criteria were defined from public input received, aligned to the NPPF and unanimously agreed at the NPWG and approved by CPC. A sub-group performed the site scoring, made up from 3 members who did <u>not</u> include members who had engaged directly with developers when identifying the sites. Guidelines were used by the scorers for each criterion to ensure consistency was applied. No site was adjacent to the home of more than one member of the sub-group. Thereafter the results were again approved by committee. This

⁴ Proposed Main Modifications (published July 2019) to the 'Hart Local Plan Strategy and Sites 2016-2032 Proposed Submission Version, February 2018'

No.	Issue	Response
		process was made public via an FAQ document published on the CPC website https://www.crondall-pc.gov.uk/file/2018/02/FAQ-Document.pdf .
6	NPWG Membership	The NPWG was governed by terms of reference from its inception. The group was made up from volunteers capable, suitably experienced and connected to enable sites to be identified and subsequently to execute the NP production process. Processes were established to ensure that no bias could take place. The make-up of the group was demographically diverse. 7 of the 10 households represented within the NPWG did not live adjacent to any particular site. Regular updates were presented to the Parish Council by the Working Group and minutes of meetings published. Key processes such as site scoring and selection were proposed by the NPWG and approved at CPC.
7	CRON21 (Broden Stables Appeal)	While some aspects of the site were noted as suitable, both Hart and the Appeal Inspector noted that the development would be contrary to Hart Policy RUR2. Appeal Decision ⁵ Para 44 is a weighing by the decision taker and remains one that CPC disagrees with. Since that time, several other local Appeals ^{6 7} have taken a more positive view of RUR2 and refused development in the countryside. Additionally, the Hart emerging Local Plan (subject to adoption in late 2019) includes a policy NBE1 that provides for similar levels of control for development in the countryside. The quashed appeal will be re-heard in Nov 2019, with the emerging Local Plan very close to being "Made" (expected Jan 2020). Hart will defend their previous planning refusal and CPC will join under Rule 6 status.
8	Statutory Review impingement on NP	The High Court judgement was issued within the same time frame as the Reg 15 version of the NP passed through the various levels of authorisation (NPWG, CPC) for submission to Hart. CPC has maintained that the Broden Stables site was less attractive than other options and received no material evidence to change the site's score. This point has been argued in some detail at each stage.
9	Q29 (suggested sites) questionnaire results	The points relating to Q29 of the original questionnaire survey results, need to be set into their context, namely the start of the whole NP process. The "scores" simply represent the number of respondents that had suggested them. This was used to create a list for objective assessment using the NPPF criteria, followed by the Site Selection Consultation and Reg 14 process. The NP process has to balance public opinion with planning judgement and in the view of the NPWG (guided by Mr Ashcroft) the scores showed Broden to be an unsuitable site for development.
10	Development Flexibility	The Inspector's changes to the Godmanchester Neighbourhood Plan ⁸ relate to an NP area of 6,800 residents (x4 bigger than Crondall Parish) expected to grow by 126% over their plan period, hence the scale of development is considerably larger and the Inspector in that case was recognising the need for flexibility. The issues and scale of development are much smaller in Crondall
11	Finn and Rio Homes	Crondall Parish council are pleased that Finn and Rio Homes are supportive of the Plan and provide further justification for the inclusion of Mill Lane as the primary site for development through the Neighbourhood Plan. The site will enable the development of Mill Lane to be a more balanced community and is able to provide a good mix of housing and provide a number of affordable homes. There is policy support for the allocation of Site 2b in accordance with the emerging District-wide Local Plan spatial strategy
12	Historic England	HE is particularly supportive of the designation of Old Parsonage Meadow as a Local Green Space, in order to conserve its historic significance, including its contribution to the Conservation Area's special interest and the setting of the

⁵ APP/N1730/W/17/3185513 - Broden Stables, Redlands Lane, Crondall

⁶ APP/N1730/W/18/3218746 – Chatter Alley, Dogmersfield

⁷ APP/N1730/W/18/3214505 – Clifton Barns, Crondall

⁸ <https://www.huntingdonshire.gov.uk/media/2780/godmanchester-neighbourhood-plan-examiner-final-report.pdf>

No.	Issue	Response
		Grade I listed Church. Also for the Local Green Space designation of the churchyard and school field.

3 Paras 2.2 to 2.4 Hart Policy, Numbers and Process

The introductory text in these paragraphs appears to have been overtaken by events. Does CPC agree with the representation made by Hart District Council in this regard?

In general CPC agrees with these changes: -

- 2.2: Accepted. Although by the time the Crondall NP is examined, the Hart Local Plan may have been adopted (planned around Nov 2019) and the Examiner may wish that to be reflected in the text.
- 2.3:
 - Local Plan modifications: Accepted
 - Housing Numbers: The text refers to Hart agreeing the approach taken by the NPWG to identify and calculate the OAHN and related material (as agreed at Hart-CPC meeting 8th Feb 2018).
 - Rural Exception Scheme: This was not in the original text or a local aspiration. It remains an extant possibility under Hart's Local Plan policies, hence no change is required to the NP.

4 Policy 1 Spatial Plan

4.1 Exclusive Parts

Much of the Policy appears to refer to matters covered by other Policies in the Neighbourhood Plan? As the development plan should be considered as a whole there is no need to repeat/cross reference policies. Please can you point out any parts of the Policy that are exclusive to Policy 1 (i.e., not referred to or covered in other Policies)?

Our ambition for this initial Spatial Policy was to set a context of the remainder of the Policies. CPC agree that points 3 and 5 are covered by policies 7 and 4 respectively and could be removed, However, Points 1, 2, 4, 6 and 7 are not specifically included in other policies and CPC would prefer that they are retained in the Plan. In particular it provides a sustainable context to guide and shape new development spatially within the Plan period.

4.2 Analysis of Important Views

Please can you point me to the detailed analysis of each important view that must be preserved, protected and enhanced; and please can you point me to evidence that this part of Policy 1 is deliverable and that it has regard to Paragraph 56 of the National Planning Policy Framework (the Framework)?

Important views are documented in the Crondall Conservation Area document⁹. They are noted on the Townscape Appraisal Map therein, which is also included in the NP under Policy 7, Page 53 *figure 26*, as designated by blue arrows.

The deliverability links to the comments on Policy 3 and hence we suggest an adjustment to the wording to "should", allowing an applicant to demonstrate the meritorious impact of their design.

Para 56 of NPPF is concerned with obligations imposed by the Local Planning Authority (Hart) which are usually associated with the granting of planning permission. The type and scope of such obligations would depend entirely on the application and its details. This policy addresses spatial planning and as such considered the general distribution and type of development. The statement of "not be supported" implies a more neutral response than "strongly resisted" used elsewhere.

⁹ <https://www.crondall-pc.gov.uk/village/conservation-area>

4.3 Creeping Expansion

Please can you point me to information in respect of how a decision maker should interpret the phrase "creeping expansion"?

The plan period covers a period of 15 years (with the acknowledgement of more regular updates). During this time, the NPWG wish to avoid the possibility of small additional developments through the repeated use of the "adjacent to the existing settlement boundary justifications" resulting in ribbon development. It is noted that Hart are adopting a policy (NBE1) in the Local Plan¹⁰ to regulate development in the countryside. Some may see its application in a strict sense as overly constraining, but the NPWG and CPC feel that it is important to stress that a less rigorous approach will result in poorly managed development. Any suggestion for alternative wording to help provide a more robust definition would be welcomed.

5 Policy 2 Housing Site Selection

5.1 Small Site Allocation

The allocations of 2a and 2c comprise very small sites providing for a net total of just 3 dwellings. They would not deliver any affordable housing. Given that the sites are within the settlement boundary, why does the Parish Council consider them to be worthy of allocation and in what way do the allocations contribute to the achievement of sustainable development?

The approach adopted within the policy was based on identifying deliverable sites within the Neighbourhood Area. Some of the sites identified were within the defined settlement boundary and some are adjacent to a boundary.

The Parish Council was anxious that the housing sites delivered a range and type of houses. It believes that the package in the Plan is a good response to this ambition. The Parish Council recognises that it could have effectively incorporated the yield from the small sites into a more general windfall delivery total, however it wanted it to be clear to local people and developers where growth would take place. As part of this process it has actively reviewed all proposed sites (including those within the settlement boundary). The Evidence Document¹¹ Section 2 pages 7-16 shows all the sites considered, assessment and down-selection. This has resulted in refinements to the wider package.

The small sites (both individually and collectively) will contribute towards sustainable development by developing appropriate new housing within the built-up part of the neighbourhood area. By definition the proposed houses will have easy access to the range of commercial and community facilities available within the village.

5.2 Windfall Allowance

Why does the Neighbourhood Plan refer to a "windfall allowance"? Is this intended to restrict the amount of housing coming forward by way of windfall development

When determining a credible plan to deliver the expected 66 dwellings over the plan period, it was agreed with Hart District Council (Meeting 8th Feb 2018) that an allowance for possible windfall sites could be included based on very conservative estimates of historic windfall sites. This does not restrict the sites

¹⁰ Hart's Local Plan is just completing Examination, with major modifications consulted upon and is due for adoption in late 2019. <https://www.hart.gov.uk/local-plan-examination-library-2018>

¹¹ <https://www.crandall-pc.gov.uk/file/2019/06/Crandall-NP-Evidence-Document-June-2019.pdf>

coming forward as windfall, but simply tries to estimate it. This is explained in more detail in the Evidence Document, section 1.

6 Policy 2b SHLA 179 Mill Lane

(Clarification by Hart District Council and Crondall Parish Council)

6.1 Hart Objection

Hart District Council objects to this allocation.

It is the understanding of CPC that a NP is free to allocate sites within reasonable bounds as part of its creation. Following the site selection and scoring process Mill Lane was found to be one of the most suitable sites and is strongly backed by a local developer. The local residents in Mill Lane were also supportive of this development. The affordable housing provision is clearly explained in both the pre-application and recent Reg 16 submission from the developer (see sections 6.6 and 6.8 below). The NBE12 (noise) objection would be mitigated through the design and planting scheme which is shown in the pre-application submission (17/02142/PREAPP) layout plan¹².

6.2 General Conformity

Is the allocation of the site in general conformity with the adopted strategic policies of the development?

The site is understood to be in general conformity with the emerging Hart Local Plan. The only area of contention would be the extension of the Mill Lane Settlement Boundary but it is accepted practice that NPs can imply modifications to such boundaries that they are usually consolidated into the next revision of the Local Plan. This was tested at the Court of Appeal¹³, with a key outcome: that Neighbourhood Plans may allocate land and do not need to be prepared as a local development document in order to do so. Section 17 of the Planning and Compulsory Purchase Act 2004 does not apply to Neighbourhood Plans, as they are not prepared by the local planning authority

The Head of Planning at HDC confirmed to the NPWG in a meeting on the 14th January 2019 that by allocating an adjacent site, the settlement boundary is extended by default.

See Fig 7 of the NP, the revised settlement boundary would follow the site boundary as it is contiguous to the existing settlement.

6.3 Sustainable Development

Does the allocation of the site contribute to the achievement of sustainable development?

The Parish Council is confident that the development of the site will contribute towards the achievement of sustainable development. It is located adjacent to an identified settlement in the adopted Local Plan. Its development will assist in the delivery of the economic dimension of sustainable development through the construction of the proposed houses and the investment in the local building trade. The additional properties would bring in more wealth and long-term financial activity.

¹² https://publicaccess.hart.gov.uk/online-applications/files/AD106B66F7DFB2E398541C91E1BE1E57/pdf/17_02142_PREAPP-PROPOSED_SITE_PLAN-1252621.pdf

¹³ [R \(Larkfleet Homes Ltd\) v. Rutland County Council \[2015\] EWCA Civ 597 Court of Appeal](#)

The Parish Council can demonstrate that development in this location will be of a sustainable nature. It will critically assist in the social dimension of sustainable development by consolidating the existing community and providing a greater degree of social cohesion. The existing residents of Mill Lane would welcome more families moving into Mill Lane to improve social interchange and to give the local community more weight to tackle the current issues with the noisy waste site to their rear and the damage to their access road. The M & S shop in the garage is better and more likely to continue than the Crondall stores. The site is within in walking distance of Finns Business Park which is a protected employment site. Its development will help to consolidate the environmental attractiveness of the existing buildings along this stretch of the A287. It will not affect any environmental designations.

Including this site is aligned to Hart's Policy SS1 as it is a sustainable location in the countryside as suggested. Some buildings already exist on the site and there is an approved application on the site for a "Change of use from paddock to mini-golf course with associated ground works, drainage and landscaping, conversion of stables to reception, stores and toilets, conversion of manage to parking and formation of new access. (Renewal of permission 15/02164/FUL. Current application 18/02644/FUL)

6.4 Protection of the Open Countryside

Page 22 of the Neighbourhood Plan states that protection of the open countryside "was a clear priority identified by respondents to the initial questionnaire." Given that the Neighbourhood Plan does not need to allocate any housing land, how does the allocation of Site 2b meet this "clear priority" identified by the community?

When the Neighbourhood Plan process started, Hart initially allocated a total of 66 dwellings under the Local Plan¹⁴. Subsequent work by CPC confirmed a local derivation of OHAN very close to that figure (see Evidence Document, section 1). Later iterations of the Hart Local Plan removed the development requirement from Crondall, but the NPWG and Parish Council felt that a modest expansion of the parish was required and agreed to continue with the NP process. At no time has Hart disputed the requirement for 66 dwellings in the Parish and the approach was agreed at a meeting on 8th Feb 2018. The general approach by CPC has to positively address the government's agenda of boosting the supply of housing land through this Plan.

Thus the NP is presented as a complete plan, which includes a desire to protect the open countryside by making a modest development allocation on a brownfield site. The constrained nature of the existing settlements prevents any significant site allocation within the settlements and no large sites within the settlements were offered. Previously Developed Land appears the next best option.

6.5 Appropriate Scale and Density

Page 23 of the Neighbourhood Plan states that any development "should be appropriate in scale and density." The site appears to support development at a higher density to that of the rest of Mill Lane. It also appears to support the development of a large number of houses relative to the size of Mill Lane. Why is the site appropriate in scale and density to Mill Lane?

The site proposes 33 dwellings in addition to those already in Mill Lane (46), including the 14 flats at the adjacent Natta 'Itchel Court' development. However, Mill Lane also includes several major additional development features: 27 industrial units, 24/7 petrol station, major crane storage facility, restaurant and golf course. The new site is slightly more dense than existing but this is in-line with government advice to ensure efficiency in housing density and make good use of precious land resources. The layout (see Site Plan within their application referenced at section 6.1) includes open areas to ensure that it is not too "closed in".

¹⁴ Hart Cabinet Meeting 9 Feb 2017, Paper B, Appendix 1 (page 17) [Link](#)

CPC has made further recommendations to the developer that can be discussed in the refinement of a finalised plan. The developer has made it clear that he would work closely with CPC in submitting a formal Planning Application to ensure that the most appropriate use of the site is made, and to incorporate the objectives of the Neighbourhood Plan.

6.6 Affordable Housing

The site scored positively in respect of social contribution as it would provide affordable housing. Can Crondall Parish Council point me to evidence of the consideration of options for the provision of affordable housing sites and/or rural exception sites around Crondall? Would Hart District Council like to comment in this regard?

Achieving an Affordable housing quota is an aspiration of the plan, as set out in the objectives, therein it is more of a local requirement than a bonus. Owing to the density of housing within Crondall Village and the limitations of suitably large sites, it is difficult to achieve an Affordable Housing yield on sites which also qualify as Sustainable. Reference can be made to the OAHN, Evidence Document Section 5, p37-42. This identifies that Crondall already has a higher ratio of affordable housing than Hart District as a whole. Crondall Parish currently has the 3rd highest proportion of social housing in Hart district (16%¹⁵).

Crondall also has an existing Rural Exception Scheme at Lefroys Field, at the north of the village.

6.7 Previously Developed Land

The site was scored positively as a brownfield site, yet the majority of the site comprises green field land with a rural character set within the open countryside. The landowner/developer considers that the whole site comprises previously developed land. Does Hart District Council agree that land within Hart associated with equestrian use necessarily comprises previously developed land and does it consider that in this case, the whole of the site comprises brownfield land? The assessment of the site at Broden Stables scored that site negatively in respect of comprising brownfield land – please can CPC point me to information that supports this apparently conflicting approach?

As explained by the developer in their comments to Reg 16¹⁶ (see section 7) there is an existing equestrian development and existing permission for conversion to mini-golf, applying to one contiguous piece of land.

The Broden Stables site consists of 4 separate fields, with the developed portion (stables & ménage) forming only around 16% (2045 / 13,133m²) of the total area. The review team felt this was pushing the definition of PDL past reasonable bounds. Additionally, Hart Council noted this in para 3.5 of their case¹⁷ to the Appeal Inspector concerning the 2016 Broden Stables application on this site:- ‘Association’ does not mean ‘part of’ otherwise in that case, by logical extension it could include land all the way from Crondall to Farnham.

Case law (e.g. Saltburn Riding School¹⁸) has continued to show that visually separate portions within common ownership do not always form a complete “package” of PDL. That Planning Inspector, concluded that as a **matter of fact and degree** the paddocks were **not** part of the curtilage of the riding school buildings due to their distinct separation within the layout of the site. He noted robust fencing and the blank gable end of a riding school building clearly separated the paddocks from the complex of buildings [para 9], parking and circulation areas and enclosures associated with the active operation of the riding school and livery yard.

¹⁵ <https://www.hart.gov.uk/parish-profiles>

¹⁶ 005 - Finn and Rio Homes

¹⁷ Hart Case: APP/N1730/W/17/3185513, LPA Reference: 16/02377/FUL, February 2018

¹⁸ APP/V0728/W/18/3207383 Saltburn Riding School, Marske Road, Saltburn by the Sea, Nov 2018

The Saltburn Inspector [para 12] was mindful that the paddocks were used ‘in association’ with the riding school, and that the whole site may be within the same ownership.

“However, whilst the use and ownership of land can be appropriate tests of curtilage, in this case they do not outweigh the distinctly separate nature of the paddocks resulting from the physical layout of the site.”

6.8 Delivering Affordable Homes

Please can you point me to evidence that the site is capable of delivering around 13 affordable homes (as referred to on page 24 of the Neighbourhood Plan) as well as providing for safe access and egress and any related/appropriate highway infrastructure?

The process of reviewing the sites including an assessment of Affordable Housing and at Mill Lane the developer had already declared his intention to provide the required amount of Affordable Housing under his pre-application enquiry ([17/02142/PREAPP](#)) and specific exchange with Hart [link](#). This was further clarified through the developer’s response to the Reg 16 consultation (005 - Finn and Rio Homes, para 11¹⁹).

The 2017 Pre-app included a Transport Assessment [link](#) and this received comments from Hampshire Highways [link](#). These comments proposed a range of additional measures to be undertaken including a revision of traffic flows in the light of recent works near the suggested site. The developer has been awaiting the conclusion of the Neighbourhood Plan to undertake further work and explained their position in para 16 of their Regulation 16 consultation response to Hart (005 - Finn and Rio Homes). The works as proposed allow safe egress onto the access road currently used by an existing: 32 houses, 14 adjacent flats, 27 industrial units, 24/7 petrol station, major crane storage facility²⁰, restaurant and golf course. As such the extra movements generated by the development are relatively small (~16 at peak times – see Transport Assessment Table 6) compared to the existing flows (~148 at peak times, see Transport Assessment Table 4). The Parish Council retains a strong desire to further improve the junction onto the A287 at this location.

6.9 Conservation Area

Hart District Council refers to the “adjacent Conservation Area.” The site is not adjacent to Crondall Conservation Area. Is there another Conservation Area that the site is adjacent to?

No. This appears to have been an error by Hart and in separate correspondence with the Parish Council they have withdrawn this and stated that they would update the Examiner.

6.10 Sustainable Location

The site was scored positively as a sustainable location, although Mill Lane lacks a range of services and facilities and relies on Crondall and other settlements for these. A number of sites in/on the edge of Crondall were scored neutrally or negatively in respect of being within a sustainable location.

Mill Lane residents already access many services (school, church, pubs etc) in Crondall. Mill Lane actually has **better** public transport links than Crondall (Bus Route 10). Most parents who live over ~ 500m from the school tend to drive, despite campaigns to walk. Residents still need to access jobs, shops and entertainment many kilometres from Crondall or Mill Lane.

¹⁹ “005 - Finn and Rio Homes” Reg. 16 response on Hart website <https://www.hart.gov.uk/crondall>

²⁰ The size of cranes using the access road has been the subject of many previous complaints and a feature of the developers proposal was to improve the access road to ameliorate some of those issues.

It should also be noted that as of Dec 2019, notice has been served that the village shop in Crondall will close, making the shop at the Mill Lane petrol station the only option within the parish, with the next nearest some 3.8km²¹ distant.

The implied reference to other sites is noted, however, each site was assessed against a range of criteria and the individual scores are held to be accurate.

6.11 Settlement Area

The site scored neutrally in respect of being in the settlement area. The site is outside the settlement boundary of Mill Lane and requires a change to the settlement boundary. Sites outside of Crondall were scored negatively, but like this site, could have been incorporated into an altered settlement boundary.

Neighbourhood Plans are assumed to modify settlement boundaries. The scoring methodology was consistently applied to ALL sites, relative to the settlement boundary criteria:

Specifically: Inside +1, Adjacent 0, Outside/beyond -1

Using these criteria CRON02 (Broden Stables) scores -1, SHL179 (Mill Lane) 0 and SHL159A (Old Parsonage Meadow) scores +1.

It should be noted that the Broden site (CRON02) is not “adjacent” to the Settlement Boundary, it is beyond it by ~30 metres due to a Rural Exception Scheme – which cannot be used as a stepping-stone to settlement boundary creep.

6.12 Rural Impact

The site would comprise a large (relative to Mill Lane and Crondall) housing site in the countryside on the edge of a hamlet and it would appear inevitable that building 32 homes would have a rural impact. However, the site scored neutrally in this regard.

The scoring guidance was: +1=Not in a rural setting, 0=Not a ‘valued’ rural setting, -1=Negative impact to rural setting. The site is an unremarkable field next to a petrol station and road, with no overlooking houses or particular amenity value. The industrial units currently established in the settlement of Mill Lane do not enhance its rural aspect, whereas local residents believe that suitably designed housing would be a positive improvement to the settlement.

7 Policy 2c CRON 21 The Bungalow

7.1 Development in Flood Zone

Please can you point me to substantive evidence that this site can be developed safely, taking into account its location within the Flood Zone?

The EA flood mapping shows that only the top north-east corner is within Flood Zone 3. The SEA²² (Table 4.3 on page 5 and section 5.13 on page 28) noted that there was only minor flood risk in this small corner. SE Section 5.16 (page 28) noted “Given the site is only partially at risk, it is considered that the requirements of Policy 2c (CRON 21 The Bungalow), and Policy 6 (The Natural Environment) will sufficiently mitigate against adverse effects.”

²¹ Crondall centre to “Sainsburys local” in Church Crookham via road.

²² Strategic Environmental Assessment of the Crondall Neighbourhood Plan

7.2 Sequential Test

Please can you clarify why no Sequential Test has been carried out in respect of this site, taking into account its location within the Flood Zone?

It is our understanding that the sequential test applies at a strategic level to consider utilisation of lower flood risk areas. It is not applicable to a single site case where a replacement dwelling is being considered. Policy 2c (and the SEA) explains that only a tiny proportion is within FZ3 and any practical design will avoid that. In that regard it meets NPPF#160b (exception test).

8 Policy 2d CRON 22 Marsh Farm

(CPC and Hart District Council)

8.1 Employment Land

The site comprises employment land and is not located within any settlement. The Mill Lane example above is indicative of concerns raised in representations that the site assessment process was subjective and inconsistent. Please can you point me to substantive evidence to demonstrate why an existing employment site outside any settlement boundary is more sustainable than other potential sites within or adjacent to Crondall village?

The Site Scoring Table (Evidence document Appendix 1, p43) shows that the scoring criteria were consistently applied to ALL sites. For the Sustainability criteria the guidance used by the scorers to ensure consistency was:

<i>+1=Easy access to community facilities w/o traffic flow increase</i>
<i>0=Reasonable access, minor traffic flow increase</i>
<i>-1=distant from facilities increase in traffic flows</i>

The process was rigorously applied to all sites considering all criteria by a panel of NP working Group members. The scores were further subject to public consultation during the Site Assessment Process and some adjustments made (see: “Crondall NP Site Exhibition Consultation Summary”, section 5).

The comments raised by some Reg. 16 respondents have been previously considered and the changes proposed by them do not reflect the objective process used. The tables in “Crondall NP Site Exhibition Consultation Summary” collated similar comments about scoring on each site and provide the justification for not changing the scores – unless appropriate.

8.2 Commercial Building Conversion

Please can you point me to evidence that it is viable for the commercial buildings to be converted to residential use and that this can be delivered in a manner that would be in keeping with neighbouring properties?

The Evidence document section 2.7 p16 provides an explanation as to why Marsh Farm was suitable and included, after the Reg. 14 consultation and feedback. The owner has advised that “the site buildings are converted Farm Buildings nearing the end of their useful life, stricter EPC requirements will mean that future redevelopment is inevitable”. The capital outlay required to meet these conditions mean that the site, in its current use, will not be commercially viable.

The owner has since applied for Permitted Development Rights²³ (“Notification of Prior Approval for the Change of Use from office (class B1(c)) to residential (class C3)”) to provide a range of dwellings (19/00706/PRIOR granted on 03/06/2019). The NPWG felt that as the site scored highly in other respects, it was a positive choice to draw the site into the NP and enable a more coordinated development to occur.

8.3 House and Household Size

Please can you point me to information in respect of what kind of housing is suitable to a “small household” and why the size of a household, as opposed to say, the size of a house, is relevant to this policy?

The “Crandall Neighbourhood Plan Local Survey Process and Results” details in section 4.22 (page 29) concerning the response to Q25 “If new homes are needed, what type of houses are needed?”, that the overwhelming view was that 1-2-bedroom houses were desired. The intent was to avoid being specific about the size of “house” and allow for some flexibility in design options. CPC would accept some adjustment of the wording to refer to 1-2-bedroom dwellings, but retention of the reference to a mixture of sizes.

9 Policy 2e Thames Basin Heaths Special Protection Area

Do CDC agree with the representation submitted by Natural England in respect of a proposed change to the wording of the Policy?

The Parish Council agrees with the suggested change.

10 Policy 3 Housing Design

10.1 Retain or Enhance Views

Please can you point me to evidence that all development can retain or enhance all views, as required by the Policy; and to the justification for this requirement, with reference to relevant and supportive national or local planning policy?

The policy sub-point is presented as “where possible” as CPC understands and accepts that this may not always be possible. However, the nature of views into, out of and within the ancient village and wider parish are key parts of its makeup and should be retained where possible. The policy wording also allows for the case where some unattractive historic visual features could be removed and more attractive options developed.

The general landscape is protected under policy “NBE3 Landscape” (para 279) within the emerging Hart Local Plan²⁴. The Conservation Area document also requires protection of important views, Policy 3 seeks to recognise that development may occur but in doing so there should be positive benefit.

²³ 18/02864/PRIOR, 18/02863/PRIOR, 18/02862/PRIOR, 19/00706/PRIOR

²⁴ Hart’s Local Plan is just completing Examination, with major modifications consulted upon and is due for adoption in late 2019. <https://www.hart.gov.uk/local-plan-examination-library-2018>

10.2 Development Requirements

Please can you point me to evidence to demonstrate that the fifteen requirements of the Policy are deliverable in respect of all development; and to evidence that the requirements of the Policy have regard to Paragraph 56 of the Framework?

The purpose of this policy is to identify a series of design principles which should be addressed and considered by emerging development proposals. The Council acknowledges that the schedule of requirements is extensive. Nevertheless, they address a series of important local considerations that will be applicable to development proposals coming forward within the Plan period. In most cases the requirements are traditional planning, land use matters which would naturally be considered by the District Council and would either be incorporated within the planning application details or would be controlled by way of planning conditions.

The Parish Council recognises that the policy may be simpler to apply if its opening element indicated that the principles would be applied 'as appropriate to the development concerned'. This would allow both a developer and the District Council to apply its provisions in a proportionate matter appropriate to the particular proposal.

10.3 Technical Construction Standards

A Written Ministerial Statement in 2015 established that technical standards relating to the construction, internal layout or performance of new dwellings should not be progressed within a neighbourhood plan. Please can you point me to any justification for the criteria in the Policy that appear to conflict with Government advice in this regard?

Hart suggested that the "exceed" word be removed and Parish Council would be content with this.

11 Policy 4 Crondall/Mill Lane Local Gap

11.1 Excessive Development

Please can you point me to information in respect of how a decision maker is meant to interpret the phrase "excessive development"?

Excessive development is used to define a level of development that encompasses any mixture of: proximity, density, size/scale above those existing across the Local Gap area (taken as a whole). The Parish Council would accept Hart's recommendation to remove this phrase.

11.2 Local Gap Justification

Crondall is a significant distance away from Mill Lane and is separated by a major, busy road. Please can you point me to evidence that demonstrates that there is a significant threat in respect of the coalescence of Mill Lane and Crondall; and also, that the inclusion of land not located directly in between the two settlements within the large proposed Local Gap is fully justified?

The Evidence document Section 3.6, p24 – Development Pressure, shows in figure 11 the location and volume of applications being made within the proposed Local Gap area. Figure 12, p25 shows sites which have been proposed within the NP call for sites process.

The Local Gap is the Parish Council's proposed response to maintaining the separation of two settlements as identified in the current, adopted Local Plan (Crondall and Mill Lane). Whilst they are physically separated by the A287 the accessibility offered by this road intensifies development pressures in this very sensitive part of the neighbourhood area.

The definition of the Local Gap has been carefully considered. It has been refined during the Plan making process. The initial proposals were: -

- Wider: reaching the parish boundary in the west and the Bowling Alley/A287 junction in the east, with a broader coverage of the fields around East Bridge Farm.
- Higher: reaching the parish boundary to the north

Following advice from our consultant and feedback from the Site Exhibition Consultation Summary (see page 23) and following Reg14 Consultation ("Crondall NPWG Reg14 Consultation Results", section 5.2 on page 13), reductions were made

The refinement process has focused on three related issues:

- To ensure that the defined area is the smallest possible to achieve the Parish Council's objectives.
- To limit the Gap to land located between the two settlements
- The use of recognisable, physical and natural features as its boundaries.

Any land not directly located in between lines drawn between the western and eastern edges of both settlements, falls within these natural boundaries. The latter issue has been designed to ensure that the area can be clearly and consistently identified and that it can be practically implemented by the District Council through the development management process.

12 Policy 5 Local Green Spaces

12.1 School Playing Fields as LGS

Please can you point me to evidence to demonstrate that the designation of the School Playing Fields as Local Green Space contributes to the achievement of sustainable development, taking into account the education authority's concerns that such a designation would present a significant risk to the appropriate expansion of the primary school, were such expansion to become necessary in the future ?

The Parish Council considers that the school playing fields are part of the social and environmental capital of the village. They are located within the historic core of the village.

The Parish Council is unaware of any proposals for the expansion of the primary school. In any event if any such proposals were to come forward it would be impractical to suggest that they would occupy the whole of the playing fields site. Any such proposals could be determined on the extent to which they would represent 'very special circumstances' as identified in Policy 6 and national policy.

The Parish Council acknowledges that a potential need for a school expansion would have the ability to contribute to the achievement of the social dimension of sustainable development by providing an improved/extended local school facility. Nevertheless, as there are three related dimensions of sustainable development, the Parish Council considers that the designation of the site as a LGS will contribute significantly towards the achievement of the environmental dimension of sustainable development.

12.2 Old Parsonage Meadow as Local Green Space

Please can you respond to the concerns raised in respect of the proposed designation of Old Parsonage Meadow as Local Green Space, whereby representations have been set out to demonstrate that the designation does not meet the appropriate tests in the Framework?

The Parish Council has sought at all times to assess potential Local Green Spaces on an entirely factual and objective basis. Parish councillors and members of NPWG are bound to work to the Code of Conduct. Naming individuals on the Council and Working Group who may live adjacent to the field (claiming “nimbyism”) is entirely unfounded and not evidenced. The method by which the sites were assessed was performed independently. The entire NPWG and Parish Council agreed the set of criteria used and the process assured that not more than **one** of the 3 members executing the scoring lived adjacent to any one site. The results were then agreed and voted on by the Working Group and thereafter the CPC. This is publicly evidenced at <https://www.crondall-pc.gov.uk/file/2018/02/FAQ-Document.pdf>

The submitted Plan includes an appraisal of each of the sites against the criteria in the NPPF on this important matter. In coming to the judgements about which sites to include within the Plan the Parish Council has taken independent advice from its retained consultant and from the District Council. This resulted in some potential sites not being pursued.

The Parish Council contends that the Old Parsonage Meadow comfortably meets the NPPF criteria on LGS designation. It is clearly in close proximity to the community it serves. The analysis comments on the historic relationship between the parcel of land and the Grade 1 listed All Saint's Saxon Church. It also highlights its role as a remnant of secure ancient farmland. The Meadow also acts as a setting for the surrounding listed buildings. On this basis the Parish Council considers that it is demonstrably special and holds a particular local significance. The site is also local in character. It should be noted that Historic England have welcomed the designation of OPM as a Local Green Space.

The Parish Council has considered the representation from Foray Homes very carefully. In addition to its general comments above it has the following specific comments on the representation.

1. The Landowner questionnaire mentioned has no part in the preparation of a Neighbourhood Plan. The Parish Council has relied on community feedback to several consultations undertaken within the context of the Neighbourhood Plan Regulations.
2. The representation does not present a compelling argument on technical grounds that the parcel of land does not meet the criteria in the NPPF and therefore does not warrant LGS designation.
3. The issue of public access to the land should not be directly relevant to the decision about the designation or otherwise of the parcel of land as a LGS. The guidance in Planning Practice Guidance (ID: 37-017-20140306) is clear that LGS designation can be appropriate for areas without public access.

13 Policy 6 Natural Environment

13.1 Principles vs Requirements

The opening sentence of the Policy refers to “respecting principles” whereas the subsequent criteria appear as requirements. Are the criteria meant to comprise requirements or guidance? If they are meant to comprise requirements, please can you point me to evidence to demonstrate that they are deliverable and have regard to Paragraph 56 of the Framework?

The policy has been designed to set out principles / guidance for new development. They are intended to be applied as applicable to the site concerned and the proposed development.

13.2 SuDS Requirements

Please can you point me to evidence to demonstrate that the list of requirements in respect of SuDS are deliverable for all forms of development?

CPC accept that SUDS will not be deliverable or appropriate for all forms of development. It is suggested that the wording be softened to “should consider” (in place of “must”).

13.3 Determining Flood Issues

Please can you point me to information in respect of, for example, when it will be appropriate, and who will determine, that development must incorporate raised finished floor levels and under floor voids ?

This would usually be defined by the Local Planning Authority within planning conditions. The list presented includes design principles that should be considered, with justification presented at the time of application to exclude them. Local knowledge shows that properties that have been recently flooded do not always correlate with Environment Agency Flood Zone definitions.

14 Policy 7 Conservation

14.1 Conservation of Heritage Assets Approach

Policy 7 is different to, more onerous than and conflicts with national planning policy set out in Chapter 16 of the Framework. For example, it includes vague and onerous requirements to enhance views; to “preserve fabric”; to accord with a long list of requirements set out in another Policy; includes a requirement in respect of curtilage, without evidencing why this is a planning matter; requires the use of traditional and vernacular building materials only; and introduces an entirely new form of protection for non-designated heritage assets.

Please can you point me to the justification for this very different approach to the appropriate conservation of heritage assets and to evidence to demonstrate that the approach has regard to national policy?

The adopted Conservation Area Appraisal document²⁵ is the basis of this approach. Within that document: Planning Policy Context (Section 1.3) refers to Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990, whereby it is desirable to preserve or enhance the historic architectural appearance of the Conservation Area. The management proposals conform to guidance from Historic England (Conservation Area Designation, Appraisal and Management) and adopts similar language.

Section 71 refers to “*the duty for the LPA to publish proposals for the preservation and enhancement of conservation areas in their district*” Therein the Neighbourhood Plan becomes part of this requirement and addresses the guidance within the NPPF (2019) 127.c. for ‘Policies should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting’ The NPPF Section 130 also refers to “*Permission should be refused ... should design fail to enhance or improve the quality of an area or take or take into account any local design standards.*”

Neighbourhood Plan Policy 7 is limited to ‘proposals within or adjacent to the Conservation Area’, thereby its applicability is to heritage assets and their curtilage. It is not designed to apply onerous requirements to non-designated heritage assets.

²⁵ <https://www.crondall-pc.gov.uk/file/2016/08/Crondall-Conservation-Area-Proposal-adopted-December-2016.pdf>

By erring towards a strict interpretation, underlining the status of such policy and being explicit, CPC believes that it will be helpful for policy administrators and developers alike, thereby enhancing the level of protection and appropriateness of development in the Conservation Area.

15 Policy 8 Community Facilities

As worded, the Policy would serve to prevent the expansion or development of community facilities. Is this a drafting error or does it reflect the intent of the Policy?

The policy was designed to safeguard the identified community facilities from proposed changes of use to other purposes (with the exception of the two circumstances included in the policy). The Parish Council is not aware of any active proposals for the extension of existing facilities.

In the event that the examiner was minded to recommend a modification that would introduce an additional part of the policy to support proposals for the expansion and/or modification of existing community facilities this approach would be welcomed by the Parish Council.

16 Policy 9 Recreation Areas

16.1 LGS Designation

The Policy includes land designated as Local Green Space. The Policy appears to conflict with that designation – for example, there is no apparent evidence to demonstrate that car parking, lighting and new buildings are suitable for Local Green Space? Should the sites be designated as Local Green Space or Public Open Space? Or can you point me to justification for designation as both and evidence of no conflict?

The Parish Council acknowledges that there is an overlap between policies 6 and 9. However, the Parish Council believes that there is a robust case for the designation of the proposed Local Green Spaces. On this basis it would be content for Policy 9 to be modified so that it referred solely to the network of public footpaths. Any potential improvements to the proposed designated LGS which are in recreational use could be determined on the extent to which they would represent 'very special circumstances' as identified in Policy 6 and national policy.

16.2 Lighting on Rural Footpaths

Please can you point me to the justification for supporting the development of lighting or car parking on rural footpaths?

The intent of the policy wording is not to convolve all options with all possibilities, but to allow for and encourage proposals that would "maintain and enhance" the sites for recreational purposes. The caveat "subject to their locations and design" is intended to provide an objective assessment of proposals whose composition and detail cannot be known at this time. The list is a series of examples and is neither exhaustive nor constraining.

Lighting on rural footpaths is an example of a normally undesirable arrangement, but within some **very** limited locations it may be desirable to ensure safer routes for residents regularly using such a route (e.g. access to school) and would balance benefit against harm.

Additional modest car parking on the edge of a recreation area to encourage use and mitigate the difficult parking issues with the village centre would be seen as a similar balanced approach.

16.3 School Playing Field as Public Open Space

Please can you point me to evidence that the school playing field comprises a public open space?

The school playing field is not a public open space, but is a highly valued recreational area used by the school for education, sports and fund-raising activities. Further to the reduction of school playing fields over recent years CPC believe that this should be protected from any incremental development activities that reduce its efficacy. It is noted that the 3rd paragraph of the policy might be adjusted to refer to “recreational areas” in lieu of “public open space”.

16.4 Public Rights of Way

Public rights of way are, by their very nature as public rights of way, already protected. Please can you point me to information that clarifies how and why all footpaths comprise “public open spaces” and why their inclusion in Policy 9 is relevant and appropriate?

The footpaths are seen as spaces that are accessible to the public for recreational activities. The extensive network could be enhanced within or closer to the settlement boundary according the principles outlined in the policy. Policy 9 refers to ‘Crandall’s Network of Footpaths’ not public rights of way. It should be noted that not all footpaths in Crondall Parish are public rights of way, as some are footpaths with permissive rights granted by the landowners. Parish Council is happy to work with the Examiner to adjust the wording to meet these intents.

Annex A - Responses to the Individual Reg 16 Representations

Please note: the numbers refer to those on the Hart website, some responses have been grouped together in non-numeric order due to their close associations with each other.

1. Peter Page

Request to be notified of decision to make the Plan

2. Highways England

No comments

3. Brian Palmer

Request to be notified of decision to make the Plan

4. Odiham Parish Council

No comment

5. Finn and Rio Homes

Crondall Parish council are pleased that Finn and Rio Homes are supportive of the Plan and provide further justification for the inclusion of Mill Lane as the primary site for development through the Neighbourhood Plan.

The site will enable the development of Mill Lane to be a more balanced community and is able to provide a good mix of housing and provide a number of affordable homes. There is policy support for the allocation of Site 2b in accordance with the emerging District-wide Local Plan spatial strategy.

6. Hampshire County Council

Further to the reduction of the school's playing fields over recent years CPC believe that It is reasonable that the school (through the LEA) would need to robustly justify development on the playing fields, hence the designation should be retained.

7. Thames Water

The points made are well understood, although it is noted that Thames Water didn't respond at the Reg. 14 stage with such detail. The detailed comments by Thames Water do not raise any specific issues with the proposed sites, as most are small-scale. It is noted that Mill Lane (Policy 2b) being the largest site proposed does not cause any specific issue. The Developer considered these issues in their 17/02142/PREAPP {see Annex A} and the feedback noted that more detail was required, but there were no fundamental issues. The proposed Infrastructure text (in section 2 of the Thames Water letter) appears more suitable for a Local Planning Authority (LPA) document than a Neighbourhood Plan as it places expectations on the LPA. However, the NPWG would be agreeable to including similar text at section 7.2 of the Crondall NP, if the "will" statements were changed to "should".

The intent of the proposed text is already managed by the Draft Local Plan, policy NBE6 and para 320: - *"Applications involving discharging surface water to foul sewers are unlikely to be supported"*

In relation to Flood Risk and SUDS, since the NP should not repeat higher level policy (to avoid risk of contradiction), this change should not be added.

In relation to the housing site selection, the enclosed desk-top assessment does not raise any issues. The need to engage with Thames Water in sufficient time for new infrastructure is understood. However, it is also noted that a new water supply pipe was installed along the A287 in 2018 and that connectivity for Mill Lane as a whole should not be an issue.

8. Michael Barnard

Old Parsonage Meadow is not included as a housing site based on the scoring. The site is an important and historic site in the centre of the Crondall Conservation Area and it should be noted that all previous planning applications have been refused, two at appeal.

9. Roy Jones

It is not clear what the respondent is referring to as he states that he supports the proposal. However, it is likely that he has been asked to make the same observation as above and the same argument will apply.

10. Millwood Designer Homes LtdPolicy 2 - The Overall Quantum of Housing Proposed by the Neighbourhood Plan

The difference between the allocated 42 and targeted 66 dwelling over the plan period is clearly explained in Crondall NP Evidence Document, section 1. This clarifies how the OAHN showed a slightly lower value, but the NPWG was content to work with the slightly higher number proposed by Hart based on a single (but unsuitable) site. Although the “66” was allocated at Hart’s Cabinet on 9 Feb 2017 based on the Hart Local Plan, the later revision of the Hart local Plan removed any requirement on Crondall Parish, but the NPWG decided to progress on the basis of the original numbers. The Plan period also included several dwellings built to date and made a reasonable allowance for windfall. This principle was accepted by Hart following a meeting with Katie Bailey on 8th Jan 2018 where the draft of the principles published in CRON-PL-NHP-0018 were shared.

Policy 2a – Land at St Cross Road, Crondall

The issue of parking provision is dealt with under the current planning application for this site (19/01461/FUL). Hampshire Highways commented on the application, raising no objection: - The site was proposed in response to the “call for sites” in the NP process and found to be both suitable and scored highly against other options. While its contribution is modest, Crondall has one of the highest proportions of social housing in the District and more provision is being made through the Mill Lane site (policy 2b).

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

The NP is a Parish-wide undertaking and the NPWG have been very clear that it should consider the wider Parish and not just the village of Crondall. The site was found to be one of the most suitable proposed and is a natural extension of the Mill Lane settlement, which includes its own shop. Local experience is that residents drive even quite short distances within Crondall village and hence distance is not an impediment to engagement with the social activities in Crondall village. This is supported by: “Local Cycling and Walking Infrastructure Plans, Technical Guidance for Local Authorities” (Gov 2017) It states on page 25 (section 6.15) that ~400m is a realistic guide to Core Walking Zones (with 2km as maximum).

The site was broadly supported during the various consultations, including 74% at Site Consultation (see Site Exhibition Consultation Summary) and 89% at Reg 14.

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

These are similar comments to Policy 2a and the response is similar. The Parish Council has recently commented on 2 different pre-applications on this site.

Policy 2d – Land at Marsh Farm, Bowling Alley

These are similar comments to Policy 2a and the response is similar. The site has recently applied for “Prior Approval for the Change of Use from office (class B1(c)) to residential (class C3)”, the inclusion in the NP allows those to be dealt with as a coherent development to get ensure a good fit with local expectations. The loss of rural business opportunities is regrettable, but the owners have been quite clear that they wish to pursue redevelopment under permitted rights and there is little that can be done to prevent this.

Policy 4 - Local Gap to the North of Crondall

The Hart Local Plan policy justification for the Local Gap was taken from Policy NBE2 and para 277: “Through Neighbourhood Plans it is open to local communities to define existing and/or designate new Gaps”. However, it is noted that policy NBE2 was removed by the Local Plan Examination Major Modification MM82, with MM84 explicitly stating that:

*“Development in the countryside between settlements can reduce the physical and/or visual separation of settlements. Development that would result in a perception of settlements coalescing, or which would otherwise damage their separate identity, will be refused. Both the individual effects of any proposals and the cumulative effects of existing and proposed development will be taken into account. **Policies to designate specific areas or ‘gaps’ between settlements can be prepared through subsequent Development Plan Documents and Neighbourhood Plans.**”*

The compliance of the Crondall NP with the strategic policies identified by Hart is documented in NP Document (section 2.2).

The basis of the Local Gap is explained in the Evidence Document (section 3), which also notes the development pressure in that area. The Millwood Designer Home has maintained a constant pressure to develop a site that falls within the Local Gap area, however the clear view of the NPWG was that such a development would start to link Crondall to Mill Lane as part of a ribbon development which was out of keeping with the style of development in the area and would remove the distinct “grouping” of the various hamlets and small clusters of houses.

Site-Specific Representations in respect of Sites SHL73 and SHL74, to the West and North West of Crondall
SHL74 & 74 were not taken into the Hart Local Plan following the 2015 consultation. The Parish Council, supported by a vast majority of residents made a very strong and clear case that such sites represented an over-development of the area, lacked transport connectivity and would have a hugely detrimental effect on infrastructure. The SHLAA assessments for the 2 sites were comprehensively discredited and the proximity of the sewage treatment works not noted in the marketing material. However (as noted elsewhere) the Parish agreed to “do its bit” for development in the District and undertook to deliver 66 houses through a NP (as noted in the Hart Cabinet 9 Feb 2017). The objective assessment of sites conducted by the NPWG against NPPF related criteria (see Evidence Document section 2) found these sites generally unattractive for development and certainly **not** required to achieve the agreed development numbers.

11. Tobias and Maddy Wilkes

The developer/owner of this site has built a case to oppose the proposed Local Gap, as evidenced in their Regulation 16 response. The purpose of their case is to remove protection afforded by a Local Gap, such that development of their own plot might occur. Section 2.2.4 of this report addresses the salient issues. CPC and its professional consultant believe that the Neighbourhood Plan Policy 4 meets the NPPF basic conditions;

Local Plan Policy NBE2 clearly justifies support for the Local Gap in this location, as has been demonstrated by the **refusal** of 19/01248/OUT Point 1, 6th August 2019. (Contrary to GEN1 & RUR2)

The proposed gap in the Neighbourhood Plan is proportionate in size with other Gaps within the district as shown in the Evidence Document 3.2.

Public support for the Local Gap in this location is clear and evidenced.

The questionnaire allowed the public to suggest areas they believed to be appropriate for the location of a Local Gap. 57% of recommendations were to the north of the village. The NPWG sought guidance from both HDC and our professional consultant as to the suitability of compliant locations, namely being within Crondall Parish Neighbourhood Plan Area and in-between settlements. The defined settlements are Mill Lane and Crondall Village. Contrary to the contention from this landowner that ‘Bowling Alley is a settlement’, it is not. Subsequently in October 2017 the NPWG held a sites consultation (ref. CRON-PL-NHP-0014 <https://www.crondall-pc.gov.uk/file/2019/06/Crondall-NP-Site-Exhibition-Consultation-Summary.pdf>) where residents were asked if they agreed with the proposed Gap. Q11 Page 13. 79% of respondents supported the proposed Local Gap (rising to 86% of those who expressed a preference).

CPC accepts that the word ‘settlement’ was used erroneously in the Evidence document in 3.2 P19.

12. Natural England

The request for the wording of Policy 2e to be amended is taken on board and the word ‘either’ should be removed.

13. Barry Morgan

Request to be notified of decision to make the Plan

Mr Morgan suggests that the Plan does not address housing needs within the village and should only build within the village settlement but the Neighbourhood Plan is a Plan for the whole Parish which includes Mill Lane. There was a strong desire to rebalance the housing numbers against the commercial and industrial developments that are creeping in to Mill Lane. There were no sites put forward within the village boundary that were large enough to generate affordable housing.

14. Anne Murray

Request to be notified of decision to make the Plan

15 Historic England

The comments made by Historic England did not reach the NPWG mailbox and were therefore unfortunately omitted from the Regulation14 Consultation Report. The Consultation Report will be amended to include the comments made by Historic England which are generally supportive of the Plan.

In particular they are supportive of the designation of Parsonage Meadow as a Local Green Space to conserve its historic significance, including its contribution to the conservation area’s special interest and the setting of the Grade I listed Church and for the Local Green Space designation of the churchyard and school field.

16. Bell Cornwell On behalf of Forays Homes

All points raised in the above Regulation 16 response are addressed within this report ref';
Key Representation Points 2.2/4,5,6,12
Policy 5 Local Green Spaces 12.2

17. William Edgerley,**18. Dennis Jones,****21. Pelican Developments and****22. Crondall Developments**

All grouped together for convenience

Background

Mr Edgerly, Indigo Planning Ltd, Pelican Developments, Crondall Developments Ltd and Dennis Jones have been promoting the site (CRON 02) Broden Stables Redlands Lane since 2015. It will be noted that their objections to the NP are largely verbatim of each other. The site came forward under the NP "call for sites", but was found to score poorly compared to other sites. The consortium continued to promote the site and have provided comments at every stage of the NP process. Their 2016 development application was subject to 173 local objections and was refused by Hart for a range of reasons, but most emphatically under Local Plan Policy RUR2 (development in the countryside). This was overturned on Appeal, but such was the strength of local objection that the Parish Council (supported by matched funding from local residents) pursued a Statutory Review at the High Court and the Appeal was quashed. The case is now with PINS for hearing on 19th November 2019.

In parallel to the High Court case, the developer submitted a 2nd almost identical application (18/02554/FUL) attempting to overcome the SPA and HRA issues. Parish Council was not persuaded that these submissions overcame the policy issues and submitted a further objection to Hart along with 105 objections from others.

Many of the comments raised by the consortium relate the suitability of the site. The Parish Council and NPWG have maintained a very clear and well-evidenced view of the site's unsuitability for development (especially at the scale suggested). More detailed evidence in the form of the summaries to the High Court and detailed objections to Hart are available.

The Site Selection process used is well defined. The simple 3 level scores do not try to differentiate between issues that are mildly negative or extremely negative (or positive). This is based on other successful local NP processes and reports of other NPs using excessive complexity leading to extended debates about the degree of a specific score.

Our approach has been to pursue to the NP process based on local views expressed through the various consultation activities irrespective of the progress of the Broden Stables case. The NPWG and CPC were very clear that it was unacceptable to have a developer "push" their site into the list when the local opinion and evidence was so contrary. It was further noted that the site (and others that asked for late inclusion) could be re-considered when the NP was updated at a future date.

Much of the material presented relates to the on-going planning applications for the Broden Stables Site. The NPWG feel that much of this is outside the scope of the NP process, but have provided informed replies for the benefit of the Inspector to set this into context and objectively justify the scores given. It is well-understood that the NP process (run by enthusiastic volunteers) has attempted to extract and justify the consensus view of the residents to form a cohesive NP. This is separate from detailed legal arguments surrounding the status of one site. The limits of a "soft touch" approach to NP development are noted, but the level of justification being demanded by this consortium exceeds the limits of Wednesbury unreasonableness.

17 William Edgerly

Mr Edgerly is referring to the Reg. 14 consultation comments.

2- Mr Edgerly and Crondall Developments Ltd are operated as a coherent group, this was a legitimate note for the record.

5 – While some aspects of the site were noted as suitable, both Hart and the Appeal Inspector noted that the development would be contrary to Hart Policy RUR2. Para 44 is a weighing by the decision taker and remains one that Crondall disagrees with. Since that time, several other local Appeals have taken a more positive view of RUR2 and refused development in the countryside. Additionally, the Hart emerging local

plan (subject to final post-Examination modifications) includes a policy NBE1 that provides for similar levels of control for development in the countryside.

6 – Phantom Motors was withdrawn for flood zone issues, thus there was no change to the NP generated by the supplied comment.

7 – Sympathetic Design was quite clearly the questionnaire response. This underpinned the wording in the policy that was drafted with expert support to be effectively and accurately worded.

8 – Given the status of the site at that time (and as it continues) the term “windfall” appears appropriate. The site is not being treated as windfall for the purposes of the definition of the development numbers. Thus, if it were granted it would be unexpected.

4 & 9 – Our understanding is that NP’s are prepared with the expectation that some site selections may adjust the settlement boundaries, but that process does not create revised settlement boundaries until the NP process has completed and the NP is “made”. The existing settlement boundaries with the Hart local Plan have been reviewed and confirmed by the process of the emerging Hart Local Plan. The Appeal Inspector’s comments at para 10 relate to the overall definition of housing land supply in the District, which is now very different from Aug 2018, with the Hart Local Plan so close to adoption. The Surgery was built as a Rural Exception Scheme.

10 – CPC and NPWG continue to dispute the status of the site as PDL. Considerable evidence was presented to Hart for the later application (18/02554/FUL – see Annex D, section 6) citing many other examples where small pockets of development on green fields was not taken to imply PDL status to the whole site.

11 – The NPWG position on these scores is quite clear and unequivocal.

- Access is challenged in detail in Annex D – section 10.4
- Sewerage issues in Annex D – section 12.8. This is underlined by the Thames Water response to the Hart Local Plan Annex E, page 7, which states: -

Crondall – The sewerage system is at its capacity and wouldn’t accommodate significant development without major upgrades to the network. Catchment is very storm responsive suffering from surface water inundation during prolonged wet weather. Depending on the scale of development proposed the capacity at the treatment works would also have to be upgraded.

- Sustainability. The distances quoted are based on the edge of the development site and appear to relate to the “markers” shown on Google Maps. Several of these are incorrectly placed (e.g. post office is 680m). Daily access to the school is a key determinant at 1100m.
- Brownfield. The statement does not recognise recent Appeal cases as listed in CPC objection to 18/02554/FUL (see Annex D, section 6).
- Rural Impact. The High Court did not consider the rural impact as this is a matter of planning judgement. The Appeal inspector (para 23) concluded that the effect would be detrimental, but not significantly. The NPWG continues to feel otherwise, as since the original decision is quashed, this point may be re-examined at a new appeal.
- Flood Risk. The local experience is well documented and shown in 18/02554/FUL (see Annex D, sections 11.3 and 12.8). Section 12.8 also notes the “creative” use of flow rates without proper FSSR growth rates and many other short-comings of the flood assessments.
- Village Boundary. The site is outside the Settlement Boundary, and beyond the existing Doctor’s Surgery (which is a Rural Exception Scheme) and does not form a natural or contiguous extension.
- Conservation Area. The High Court did not consider impact on the Conservation Area as this is a matter of planning judgement. However, the Appeal inspector (para 25) noted the Hart Landscape Officer’s concerns about negative impact, but formed a different planning balance. With the Appeal quashed, this point maybe re-argued at the revised hearing.

SANG mitigation. There is no discrepancy in the position of CPC with the High Court witness statement and preparation of the NP. The Witness Statement highlights specific issues with the efficacy of the SANGs and the consequential impact on the SPA. These are managed by the LPA (Hart) who may wish to update and improve them in the future. The NPWG is required to comply with Hart’s extant policies, which require consideration of SPA, SAMM and SANG. Any future developments will require the completion of an Appropriate Assessment as part of their determination. HRA, “Sweetman” and related issues are discussed in section 2.8 of the NP.

18. Dennis Jones

The NPWG considered all comments from all responders with great care. The original process to assess the sites had been conducted with great care to ensure probity, both through the breadth of the NPWG members and professional advice from Mr Andrew Ashcroft as a consultant. While some continue to disagree with the conclusions, little specific evidence has been provided to justify changing the scores. It should be noted that after the site assessment process resulted in 24 separate changes to site scores and descriptions (see Annex F - Site Assessment Consultation: Process & Results, section 7.3), including one associated with CRON2 (Broden Stables). Reg 14 also resulted in 3 major changes to sites selected due to the material submitted.

At each subsequent public consultation, material evidence to justify changes was reviewed and where appropriate changes were made. Each stage of that having been overseen and reviewed in detail by Mr Ashcroft. It will be noted that the Aecom SEA report considers more than just the selected sites and includes the top 10 sites.

The NP process is driven by local knowledge, underpinned with evidence. Much of this related to flooding is presented in the objection document to the Broden Stables Site applications (Annex C – section B1 and Annex D – section 11.3).

The site selection process considered a wide range of criteria including previous developed land. The Mill Lane site was noted as PDL within the pre-application (17/02142) see Annex G – section 7.

The points relating to Q29 of the original questionnaire survey results, need to be set into their context, namely the start of the whole NP process. The “scores” simply represent the number of respondents that had suggested them. This was used to create a list for objective assessment using the NPPF criteria, followed by the Site Selection Consultation and Reg 14 process. The NP process has to balance public opinion with planning judgement and in the view of the NPWG (guided by Mr Ashcroft) the scores showed Broden to be an unsuitable site.

The reasons for refusal voted by the Hart Planning Committee (12 April 2017) included: -

2. The proposed development would have a significantly urbanising effect on the character and setting of the countryside by virtue of its siting, scale and prominence in the landscape. As such, the proposal is considered to conflict with the requirements of policies GEN1 and RUR2 of the Hart District Local Plan.

CPC has not written to the local MP in relation to the matter of Broden Stables. The issue of the High Court in avoiding matters of planning judgement is discussed above.

Q30 is part of the Questionnaire discussed above. It simply reflects the views of residents at that time (Jan-Feb 2017).

Mill Lane had been represented on the NPWG and the NPWG has agreed unanimously to present the site selected and the later plan. We have been careful to ensure Mill Lane residents have been given a clear voice in the process.

The discussion of Settlement Boundaries and revised scoring is discussed above (Mr Edgerly).

The long table appears to relate to the Reg 14 version of the NP (e.g. section 2.4 referring to development targets). It is also equivalent to the other submissions from this group and underlines the coordinated nature of the consortium approach to pushing the parish into accepting their site. The context for the development target is explained in the Evidence Document (section 1).

The remaining text is identical to that submitted by Crondall Developments Ltd, please refer to those responses. Although some referenced material does not appear to be within Mr Jones' submission.

21. Pelican Developments

Noting the close similarity with other comments from the consortium, some answers below maybe brief and refer to the previous responses. However, the comments refer to the Reg 14 consultation responses, not the Reg 15 NP and hence their applicability is questioned.

1. The High Court judgement was issued in the same time frame that the Reg 15 version of the NP passed through the various levels of authorisation (NPWG, CPC) for submission to Hart. CPC has maintained that the Broden Stables site was less attractive than other options and received no material evidence to change the score. This point has been argued in some detail at each stage.
2. The arguments at Appeal were much wider than this suggests and the strength of RUR2 (now being superseded by NBE1) underline that this development is contrary to Hart's Local Plan policies. The NP process did not find the site an attractive alternative. The point about SANG process and the NP process has been previously answered above.
3. Treating the site as windfall if granted remains the CPC position. See above.

4. As per the original response, the sites were selected and moved through the NP process. To continually revisit the scoring would render the process never-ending, but the NPWG were of the view that the scores remained valid.
5. The practical issues with access have been explained in detail in the two CPC objections and one Appeal submission. The need for junction improvements at Mill Lane is fully understood and explained, but such actions at a different site do NOT improve the pitiful access into Broden Stables.
6. The problems with the access to Broden Stables are well explained in the various submission to the planning process. In particular the use of unfeasibly small cars in the Swept Path Analysis was noted.
7. With the Appeal Quashed, the CPC position remains unchanged.
8. As the response makes clear, the justification is in the Site Selection documentation that was published for the Sites Consultation. This adopted a very simple Red/Amber/Green scoring (coded as -1,0,+1) – with the clear implication that the Broden Site was generally negative. Appendix 1 of the Evidence document shows a detailed breakdown of the scoring of each site by individual criteria.
9. The sewerage problems are discussed above.
10. The views expressed are different to the conclusion of the NPWG on this matter for the reasons given.
11. The main issues have been discussed above and the NP process is not about a competition between these 2 sites. But the table presented here rather distorts the local situation and many values are questions (see above). There is an extremely viable large shop at the petrol station adjoining the Mill Lane development. When considering the school options, St Nicholas School is only 1,700m from Mill Lane and for any journey over 800m, most residents take their cars.
12. The score represents local views about the site suitability.
13. & 14 The proportion is small and more recent case law supports that contention (Annex D, Section 6).
15. 16, & 17. The Site Assessment Exhibition documents (Annex H) explain this very clearly and the development will have a negative effect.
18. & 19. Flood issues have been explained above and the view of the NPWG is that the effect is negative.
 - a. The claim of “no flooding” is materially wrong: the last flooding event was: Jun 2016:-



- b. The Hart Flood Map²⁶ shows several flood events (Fig 4a-3) and the whole area as an indicative ground water flooding area. SUDS are shown to be unsuitable (Fig 9-3).
- c. The Environment Agency Flood map show Redlands Lane as FZ3 near the bottom and high risk for surface flows along the length of the lane past the Broden Stables site.

²⁶

https://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_published_documents/Planning_policy/SFRA%20Maps%20July%202016%20compressed.pdf

20. & 21. The justification is very clear: the site is NOT contiguous to the settlement boundary. This is defined in the Site Assessment Exhibition (Annex H).
22. The Planning Inspector (para 25) noted the Hart Landscape Officer's concerns about negative impact, but formed a different planning balance. With the Appeal quashed, this point maybe re-argued at the revised hearing
It should be noted that NPWG accepted some comments, hence the non-contiguous numbering of these points.
27. The NPWG response explains that there is a difference of opinion and that the sources cited have not made a comparative assessment according to the selected criteria (as defined in Annex H).
28. See #3 above.
29. The purpose of the NP process is to select the most acceptable sites (based on a mixture of opinion and policy), it is not about picking the most convenient simply because that has been strongly promoted by a developer.
30. The respondent draws different conclusion from the information presented. The excess of vehicles outside many houses in the village (affordable and privately owned) is a separate problem, but demonstrates how those living in villages need vehicles to access any major shops and employment. The practical reality is that they will then use those vehicles for many local journeys. Indeed, one of the major problems outside the school is so many locals parking haphazardly, despite many living close to the school.
33. The response clarifies the problems. It should be noted that there is a bus service that stops at Mill Lane ([route 10](#)).
34. The deliverability of Mill Lane has been confirmed with the agent and owner as part of a rigorous process for inclusion of sites in the NP. The NPWG were very keen to avoid undeliverable sites. The claim of 2 planning applications is disingenuous, Hart refused the 1st and the 2nd will be decided shortly. Since applications are determined in accordance with the Local Plan, it is unlikely that Broden Stables will succeed.
35. Crondall Parish contains the 3rd highest proportion of social housing in Hart district (16%). The selected sites in the NP will deliver additional affordable housing. We also note the recent trend for developers to try and avoid delivering their defined housing quota once work has started.
39. This number is published on the Hart website under Parish Profiles. Site deliverability has previously been answered.
40. As noted, the screening process ensured that sites were sufficiently deliverable to be considered. The Broden Stables site has been refused and is like to be found in conflict with the revised Local Plan – thus there are huge questions over its deliverability.
44. See previous discussion on site selection.
45. The original Appeal result has been quashed and it will now be re-heard within the evolving environment of the Local Plan (both extant and emerging). Given the re-interpretation of RUR2 (noted above) outright refusal seems most likely.
46. The 12 homes referred to are predicated on a Broden Stables that has been comprehensively rejected at LPA and High Court levels. The NP proposes an inclusive future for Crondall as the wider parish and avoids the supposition presented.
47. The comment refers to the struggling sewerage system in Crondall.
48. As stated, the proposed plan includes a range of sites that meet the OAHN as agreed with Hart.
51. Despite some access to local amenities, residents still need to: go to work, enable children to access secondary schools, conduct major weekly shopping (not everyone can afford "Ocado") and visit entertainment centres beyond the parish.

The concluding remarks need to appreciate the parish-wide nature of the NP and the clear evidential basis that it has been developed from.

22 Crondall Developments

Policy 1: The opinions expressed are clearly contrary to the policy as written. Generally, the NP process is free to select the most suitable sites within the whole parish and promote them through the NP process. That process has considered the points raised and resulted in the sites selected.

Policy 2: The proposed sites meet the needs of the development targets, with affordable housing being delivered at Mill Lane. It should also be noted that Crondall has one of the highest proportions of social housing in the District.

Policy 2a: Affordable housing is delivered by other sites.

Policy 2b: The objective scoring method adopted by the NPWG assessed Mill Lane very highly. Other key points are dealt with above.

Policy 2c, d, e: Affordable housing is delivered by other sites.

Policy 7: The “Important views” are defined by the Conservation Area documentation, the NP adds additional views that make up the unique character of the parish.

19. Peter Hall

Request to be notified of decision to make the Plan

Generally supportive of the Plan with a request to increase the size of the Local Gap to the east to improve views. As defined in Key Representation Points 2.2/4 above the Local Gap has been designated to be compliant with requirements. There it has been re-sized, re-drawn and located appropriately. The Local Gap policy is not designed to ‘improve views’.

20. Gladman

While a series of statements about the National Planning Policy, the submission makes no comments about the compliance of the Crondall NP with the points highlighted.

With regard to the relationship to the Local Plan, the Crondall NP delivers more housing than required by the emerging Hart local Plan. Provision to meet the 230-dwelling shortfall at the end of the Hart Local Plan period is a matter for Hart. The NP has been reviewed to ensure its compliance with the identified strategic policies in the emerging Local Plan.

Policy 1: Spatial Plan:

Settlement boundaries are an integral part of the Hart Local Plan policies and the NP simply builds on that concept. The revised wording is far too open ended and makes no reference to the proposed sites. The wording was considered acceptable by the NP Consultant.

The Inspector’s changes to the Godmanchester Neighbourhood Plan relate to an NP area of 6,800 residents (x4 bigger than Crondall Parish) expected to grow by 126% over their plan period, hence the scale of development is considerably larger and the Inspector was recognising the need for flexibility. The issues and scale of development is much smaller in Crondall.

The “Important views” are defined in Policy 7 and relate to those listed in the Conservation area document. The policy wording could be updated to make this clearer.

Resisting creeping development is laudable aim and matched by the desire to preserve the setting of the settlements.

Policy 2: Housing Site Selection

Only 2 sites are within the existing settlement boundaries.

The Mill Lane site will deliver the required affordable housing.

Policy 3: Housing Design

It is proposed to remove from the sub-policy the word “exceed” from the “Nationally Described Space Standards”, to align with policy H6 of the emerging Hart Local Plan which had this point removed at examination (MM57).

Policy 4: Crondall/Mill Lane Local Gap

The definition of local gaps is delegated to NPs from the emerging Hart Local Plan. Policy NBE2 (Gaps between Settlements) was removed by MM82, while MM84 added a new para 9282) stating: -

Development in the countryside between settlements can reduce the physical and/or visual separation of settlements. Development that would result in a perception of settlements coalescing, or which would otherwise damage their separate identity, will be refused. Both the individual effects of any proposals and the cumulative effects of existing and proposed development will be taken into account. Policies to designate specific areas or ‘gaps’ between settlements can be prepared through subsequent Development Plan Documents and Neighbourhood Plans.

The Local Gap boundaries have been carefully defined to follow natural features and extant boundary markers. The need and associated evidence is in the Evidence Document (section 3).

24. Phantom Motors

Despite NPWG support for the re-development of the site and for the business, as indicated by local representations, 17/02338/PREAPP advice for this site show that that any proposed development would require flood mitigation and a sequential test owing to its location within Flood Zone 3. During the development of the Plan the NPWG offered to commission a test but were advised by Bell Cornwell that they

had already undertaken such and advised the NPWG on 9th September 2018 'we are well advanced in carrying out the sequential test for Phantom's Pankridge Road site'. Unfortunately, in January 2019, when the finalisation of the proposed sites had to be made for the formulation of the Plan, it transpired that no such work had been undertaken or was mature enough to allow the site to have been included in the Plan. It is particularly disingenuous of Bell Cornwell to criticise the NPWG regarding a sequential test, having committed to achieve one in the required timeframe but only to provide it after the event in their Regulation 16 response. In so doing they have let down their client and the people of Crandall. Should the site owner wish to pursue development of the site CPC has already offered their assistance

The owners' requirement that the site could only be developed conditional upon relocation to a specified plot to the north of the village, limited the likelihood of development being able to occur, particularly owing to the limitations of the target site in question. With such a low probability of conversion, the NPWG believed that it was not appropriate to promote development of the site.

Reference to the Bungalow and Flood Zone is addressed in 7.1 & 7.2 above

Housing Numbers – It is a clear contradiction to maintain that the NP (which includes a housing target and qualification of sites) takes a negative approach to development whilst at the same time acknowledging that there is no specific target set by the district!

Local Gap – see Key Representations 2.2/3, 2.2/4, 11 – Policy 4, Annex A, 11, 20/4

25. Farnham Town Council

The request to give consideration to incorporate improvements to the A287 to allow for increased traffic from new developments in Farnham is covered under Policy 2b, but traffic improvements are outside the remit of the Neighbourhood Plan.

23. Sheila Lambert

Refers specifically to Old Parsonage Meadow site:-

Affordable housing is only achievable if a developer proposes to build sufficient quantity of homes No such proposition was received during the NP process. Typically on such a site the developer looks to maximize profits by building a smaller number of higher quality homes, as has been demonstrated by recent proposals for this site.

The unkempt nature of the site relates to the lack of appropriate maintenance of the site. It does not have bearing upon its suitability for development CPC is also frustrated by the owners' attitude over the past thirty years to bespoil what should be a key feature of the views across the village.

See Annex A point 26 below

26 Norman Lambert

Refers specifically to Old Parsonage Meadow site:-

The scruffy appearance of the site is owing to the owner's lack of maintenance. This is not a reason for development. Private ownership is not a reason why LGS designation should not be applied.

The facts used by the NPWG in drafting the site selection for the NP was based on quantified input from the Questionnaire from the entire community, not conversations with selected, unquantified, unidentified residents. At the time of the call for sites and subsequently the site down-selection to create the Plan, no formal proposals had been made to part-develop the Meadow. This had been informally suggested by a previous developer (Friday Street), however the terms specified at the time that the residual undeveloped land would remain in private ownership. The Parish Council recognised that if development protection were removed the remainder of the site could be exploited.

The NP has followed its objectives to try and achieve 2-3-bedroom housing, enabling downsizing, thereby freeing up larger housing stock, as well as providing stock in the demand segment for new house owners.

The NPWG was governed by terms of reference from its inception. The group was made up of volunteers who were capable, suitably experienced and connected individuals. The make-up of the group was demographically diverse. 7 of the 10 households represented did not live adjacent to OPM. In order to mitigate any such perceived bias, the Group ensured that the site evaluation criteria were agreed by the whole NPWG majority and signed off by CPC. The sub-group tasked with performing the site scoring was made up from 3 members and did not include members who had engaged directly with developers when identifying the sites. No site was adjacent to the home of more one member of this sub-group. This was

designed to ensure that no bias could be exercised. An explanation of this approach was provided to the Parish Council by the NWG chairman and was included in an FAQ document published on the CPC website <https://www.crondall-pc.gov.uk/file/2018/02/FAQ-Document.pdf>. Indeed Mr Lambert, as a CPC member is aware of these facts.

27. Hart District Council

Para/ Page	Changes Requested	Reason	CPC Response
2.2	<p>Recommend the following updates:</p> <p>The New Hart Local Plan (Strategy & Sites) document was produced on 26th April 2017 with a 6-week period of consultation thereafter... A list of Amendments will be subject to a further 6-week consultation in mid-2019 and it is likely that the Hart Local Plan will be formally adopted around September 2019.</p> <p><u>A list of Proposed Modifications were published for consultation on 5th July 2019 for 6 weeks. Subject to the outcome of that consultation the Plan could be adopted by the end of 2019.</u></p>	Update to reflect the progress of the Local Plan.	Accepted Although by the time the Crondall NP is examined, the Hart Local Plan may have been adopted and the Examiner may wish that to be reflected in the text.
2.3	<p>Recommend deleting the first para and replacing with:</p> <p>Hart District Council has generated a target housing number based on the Government's revised approach to housing need as this is the methodology that is in place now the Hart Local Plan has been submitted for examination. This approach results in an indicative figure for Hart District Council of 6,208 houses over the Plan period, equating to 388 houses per annum which allows for an uplift on the government calculated figure of 292 per annum. Following the Inspector's initial report, the numbers have been updated to incorporate the unmet needs of Surrey Heath District Council of 731 which gives a revised target of 433 per annum.</p> <p>Allowing for completions and expected completions and 'windfalls' from unidentified small sites, this means Hart is planning for 1,539 plus the additional 731 houses to be built over the Plan period.</p> <p><u>Hart's housing requirement is 423 homes per annum in the District, which equates to 7,614 homes over the plan period 2014 –2032. This requirement comprises:</u></p> <p>a) <u>Hart's objectively assessed housing need (OAHN) of 382 homes per annum identified in the Joint Strategic Housing Market Area Assessment for Hart, Rushmoor and Surrey Heath, November 2016 (SHMA); plus</u></p>	Update to reflect the Proposed Modifications to the Local Plan.	Accepted

Para/ Page	Changes Requested	Reason	CPC Response
	<p>b) <u>An additional 41 homes per annum (731 homes) to address an unmet housing need in Surrey Heath under the duty to cooperate (Surrey Heath is part of the Hart, Rushmoor/ Surrey Heath Housing Market Area).</u></p>		
	<p>The number of houses allocated to Crondall Parish by Hart in their draft (<u>Regulation 18</u>) Local Plan published in 2017, was 66. This number was derived from a notional allocation to one registered SHLAA site. However, the emerging Hart Local Plan does not give a target for Crondall and leaves the yield decision to the Neighbourhood Plan. At their meeting on 29th January 2018 the Parish Council agreed to continue with the Neighbourhood Plan close to the original number (i.e. 66). Our Objectively Assessed Housing Needs report concludes that, whilst an allocation of 66 houses might be justifiable for Crondall Parish, it should be seen very much as an upper limit. The methodology and supporting assumptions have been agreed with Hart District Council.</p> <p>In calculating Crondall's need for housing to be met by the Neighbourhood Plan, we have allowed for permissions granted but not yet built and an allowance for expected future windfalls. The number of permissions granted since the start of the Plan period is 15 and a conservative expectation of windfall sites is 12. Details confirming the approved applications and how the windfall number was arrived are included in the Evidence Document.</p>	<p>Whilst the Council does not object to the Parish planning for 66 additional homes, the struck through text, if retained, could be confusing when considered alongside the latest iteration of the emerging local plan which does not identify a specific housing need or allocation for Crondall. It is not necessary to make this statement in the Plan and so we suggest it be removed.</p>	<p>Support for the defined number and approach is understood. The text refers to Hart agreeing the approach taken by the NPWG to identify and calculate the OAHN and related material (as agreed at meeting 8th Feb 2018)</p>
	<p>6th/7th Para: Recommend rewording 'Social Housing' to 'Affordable Housing'</p> <p>A Proposed Modification to the emerging Local Plan amends the reference to 11 or more dwellings in emerging Local Plan Policy H2 to developments of 10 or more dwellings.</p> <p>Reference could be made in the plan to consideration of a Rural Exception Site if a suitable site and housing need could be identified.</p>	<p>To use the same terminology as the NPPF.</p> <p>To provide consistency with the emerging Local Plan.</p>	<p>Accepted</p> <p>Update with Local Plan definition.</p> <p>This was not in the original text. It remains an extant possibility under Hart's Local Plan policies.</p>
Page 21 – Evidence and Justification and Policy 2	<p>The Local Plan does not require Crondall to provide additional housing, but it is open to Neighbourhood Plans to allocate sites for additional housing. The Council supports the intention to provide additional homes within the Parish of Crondall, and in particular to provide additional affordable housing but it does continue to express concern about the suitability and the sustainability of the Mill Lane allocation.</p>		<p>This has been a core tenant of the NP since the initial Site Selection work. NPs are empowered to merge local opinion</p>

Para/ Page	Changes Requested	Reason	CPC Response
	<p>One of the benefits of providing additional housing is to help maintain the viability of facilities in the village of Crondall (e.g. village shop and school). This is reflected in paragraph 78 of the NPPF: “78. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”</p> <p>In the Council’s view that there is no clear/persuasive evidence to support the sustainability of Mill Lane over other sites at the village of Crondall. The contribution to the achievement of sustainable development is one of the Basic Conditions that must be met by neighbourhood plans. Mill Lane is classified as a Tier 5 settlement in the Council’s settlement hierarchy, with very limited public transport or community facilities/services. Tier 5 settlements are hamlets or small clusters of dwellings which due to their small size and lack of facilities fail to fall within Tiers 1-4. In contrast, Crondall village is a Tier 4 settlement with a range of community facilities/services in a pleasant village environment. Indeed it is the largest of the Tier 4 settlements – the next largest village being Hartley Wintney</p>		<p>with policy to select sites.</p> <p>The para also notes that development in related settlements can help others. Mill Lane residents already access many services (school, church, pubs etc) in Crondall.</p> <p>Mill Lane actually has better public transport links than Crondall (Bus Route 10). HW is 8km away (straight line), while Odiham is 5km.</p>
	<p>The most sustainable way of supporting facilities in Crondall village is to locate the additional houses at the village itself, not at Mill Lane, where people are less likely to use the village facilities, and if they do, they are more likely to use their car in getting to them. For example, parents are less likely to walk their children to Crondall school from Mill Lane than from the village itself. Equally Mill Lane residents are less likely to use the village shop in Crondall than those living in the village.</p>		<p>This was VERY clearly not the community’s wish and no suitable sites were presented. Most parents over ~ 500m from the school tend to drive, despite campaigns to walk. Residents still need to access jobs, shops and entertainment many kilometres from Crondall or Mill Lane.</p>
	<p>Amenity: The site is located immediately adjacent to a petrol filling station and the busy main road (A287) which raises questions as to whether this site performs well in terms of achieving a high standard of residential amenity.</p>		<p>The pre-app design acknowledged the required safety distances from the petrol station and presented a well-thought out design with generous gardens and smart planting for screening.</p>
	<p>Finally, the text does not make clear how the proposed new settlement boundary at Mill Lane has been identified, the factors taken into account to define it and how it will be identified on the ground.</p>		<p>See Fig 7 of the NP, the revised settlement boundary would follow the site boundary as it is contiguous to the existing settlement.</p>

Para/ Page	Changes Requested	Reason	CPC Response
Policy 2a CRON 27 St Cross Road	Second paragraph delete 'small'	This is not quantified and is therefore unclear to the decision maker.	Accepted
	3rd bullet – ‘..Hart District Council’s adopted published standards..’	The Councils current standards have not been formally adopted. Also relevant to other references in the Plan.	Noted, suggest replace with “Hart’s Parking Guidance 2008”
	<p>We are pleased to see that this policy mentions the potential need for groundwater flooding mitigation. However, the policy seems to be confused as to source of this information. The potential risk for groundwater flooding to occur at the surface at this site is shown within the Hart’s Strategic Flood Risk Assessment (SFRA) 2016 and the British Geological Survey’s susceptibility to groundwater flooding maps contained within this document. The Environment Agency’s online maps only cover Main River, surface water and reservoir flooding and as a result cannot be used as an indication of groundwater flooding risks.</p> <p>The groundwater maps (Figure 10-3 page 41) within the can be viewed here: https://www.hart.gov.uk/sites/default/files/4_The_Council/Policies_and_publiched_documents/Planning_policy/SFRA%20Maps%20July%202016%20compressed.pdf</p>		Noted. The EA on-line service noted this site as FZ1 . Reviewing the groundwater link, it is noted that the site has no flood history and ground water risk is common across the whole village (Fig 4a-3), Hence, we suggest the paragraph is removed.
Policy 2b SHLA 179 Mill Lane	Notwithstanding the comments on Policy 2 above, the scale/cost of highways mitigation works have not been made available and therefore it is unclear whether this site would be viable to develop or whether the cost of the highways infrastructure would impact on the scheme, in particular the affordable housing provision.		This appears to be more detail than is required in a NP and can be readily addressed at the application stage.
	<ul style="list-style-type: none"> <u>Ensure that residents are not subject to unacceptable air and noise pollution</u> 	The site is located on the A287 and close to an employment area attracting a significant flow of HGV vehicles. Noise impact would therefore need to be considered through draft Local Plan Policy NBE12.	Noted, but the pre-app plan included design features and screening to mitigate these issues.
	<p>If this allocation is retained recommend modifying the following bullet point:</p> <ul style="list-style-type: none"> <u>Its layout shall allow for the retention of existing on-site and boundary trees where they contribute to the character of the area, and the provision of new on-site trees and additional planting with green open communal spaces to minimise any impact of the development on the adjacent open countryside; and</u> 	To clarify the need to mitigate any harm to the surrounding landscape/open countryside in accordance with the recommendations of the SEA.	Accepted

Para/ Page	Changes Requested	Reason	CPC Response
	<p>Recommend the following change:</p> <p>Site Background (7th para)</p> <p>Some buildings already exist on the site and there is an approved application on half the site for a mini-golf course with associated ground works, drainage and landscaping, conversion of stables to reception, stores and toilets conversion of manage to parking and formation of new access (15/02164/FUL). There is also a planning application affecting the site (18/02644/FUL), which was granted in February 2019. <u>This application was renewed in 2019 (18/02644/FUL).</u></p>	To improve clarity.	Accepted
	<ul style="list-style-type: none"> <u>Its layout and design should respect the historical assets of the adjacent Conservation Area</u> 	To provide guidance regarding the need to mitigate any impact on the adjacent Conservation Area.	We can find no evidence of an adjacent Conservation Area, but would agree that the design should respect existing styles.
Policy 2c CRON 21 The Bungalow	<p>While the vast majority of this site is in Flood Zone 1, a small area at the front of the site is in Flood Zone 3. Under the NPPF, sites within Flood Zone 3 are required to be supported by a Flood Risk Assessment (NPPF footnote 50). Ideally policy 2c should state that a Flood Risk Assessment will be needed at the planning application stage. As long as the site layout is undertaken with flood risk in mind, it should be possible to develop this site safely.</p>		This relates to NPPF para 163, which notes “ <i>When determining any planning applications...</i> ” hence this information should be presented at the application stage.
	<p>Since part of the site falls within Flood Zone 3, strictly speaking a Sequential Test is require by the NPPF (NPPF Paragraph 158). As set out by the NPPF Paragraph 157 and the Planning Policy Guidance paragraph 064, Sequential Tests should be undertaken at the Neighbourhood Plan stage with the aim to steer development towards the lowest areas of flood risk from all sources. We are disappointed that the Sequential Test has not been done at this stage and has instead been left for the developer. Once the Neighbourhood Plan has been approved, the principle of a development happening on this site would have been agreed, at which point it is too late to apply the outcomes of the Sequential Test.</p>		The sequential test applies at a strategic level to utilise lower flood risk areas. It is not applicable to a single site case. The policy explains that only a tiny proportion is within FZ3 and any practical design will avoid that, in that regard it meeting NPPF#160b (exception test).
Policy 2d CRON 22	<p>The policy concerns the conversion of existing building for residential use, however some of the criteria appears to be leaning towards demolition and rebuild. It is therefore unclear whether rebuild could be considered.</p>		The preferred outcome would be to rebuild to create a modern, attractive development.

Para/ Page	Changes Requested	Reason	CPC Response
Marsh Farm	<p>We understand that Windamoore Farm (a site with a low risk of flooding from all sources) has also been removed for non-flood risk related reasons and replaced by Marsh Farm. While Marsh Farm is in Flood Zone 1 with a low risk of flooding from Main Rivers, the site is at risk of flooding from other sources. The western side of the site is shown by the Environment Agency's Flood Map for Surface Water to be at risk of surface water flooding. The British Geological Survey Susceptibility to Groundwater Flooding maps (See Hart's SFRA) also shows the western side of the site to be at risk of groundwater flooding at the surface. Hart District Council has a record of highway flooding in the road in front of the site from 2006 and 2007.</p> <p>While we are disappointed that a site with a low risk of flooding from all sources has been replaced by a site with surface water and groundwater flooding risks, we understand that Marsh Farm already has permission under a change of use. As a minimum we would seek the need to provide mitigation for surface water and groundwater flooding to be set out in Policy 2d.</p>		<p>Windamoore Farm was removed at Hart's request due to sustainability issues. The flood affected area is tiny and development can avoid that. Additional text can be added as suggested.</p>
Policy 2e Thames Basin Heaths Special Protection Area	<p>Recommend the following amendment: Delete 'either' at the end of the first line of second paragraph.</p>	<p>Both bullet points need to be met not 'either' of them.</p>	Accepted
Policy 3: Housing Design	<p>Recommend the following amendments: Housing Design</p>	<p>The policy is presumably aimed at all development not just housing.</p>	Accepted
	<p>Recommend the following amendments: <i>Development proposals for new homes must meet or exceed the Nationally Described Space Standards;</i></p>	<p>To reflect the proposed modifications to the draft Local Plan.</p>	Accepted
	<p>Recommend the following amendments: <i>Development shall address and where possible retain or enhance views both within settlements, between buildings and beyond, towards the countryside in accordance with Policy 7 and proposals shall explain how this is achieved;</i></p>	<p>To define the important views as opposed to all views.</p>	Accepted
Policy 4 Local Gaps	<p>The Council recognises that subject to appropriate evidence it is open for local communities to designate local gaps through neighbourhood plans.</p>		Noted
	<p>Recommend the following amendments: The Neighbourhood Plan designates a Local Gap, to the North of Crandall <i>Development proposals within the Local Gap that would lead to physical or visual coalescence, excessive development or will damage the</i></p>	<p>Query the term 'excessive development'. The Gap designation between settlements is about avoiding real or perceived coalescence and</p>	Accepted

Para/ Page	Changes Requested	Reason	CPC Response
	<p><i>integrity and distinctive identity of the adjacent settlements of Crondall and Mill Lane, will not be supported.</i></p>	<p>harm to the separate identity of settlements. The phrase 'excessive development' is not necessary, and is undefined in terms of scale. The policy is therefore clearer without that phrase.</p>	
	<p>Recommend the following amendments:</p> <p>Evidence and Justification</p> <p>The emerging Hart District Council Local Plan has not defined a Local Gap for Crondall Parish owing to the Hart Local Plan not allocating any developments adjacent to the Parish. But the emerging Hart Local Plan does allow for locally proposed Gaps within Policy NBE2 and para 277 <u>(as proposed to be modified following the examination hearings in December 2018) does not include a Gaps policy, but it does state under the landscape policy that Gaps can be designated through Neighbourhood Plans.</u> The proposed Crondall/Mill Lane Local Gap supplements the approach to Local Gaps taken in the adopted Local Plan and that in the emerging Local Plan. It intends to provide an appropriate degree of protection to this part of the neighbourhood area given its importance in safeguarding the separate identities of the two distinct settlements.</p>	<p>It is incorrect to say that the submitted local plan had no Gaps in Crondall because there were no allocations for development. In preparing the local plan the Council was not convinced that there was sufficient justification for a Gap policy, preferring instead to target Gaps at areas with a more obvious threat of settlement coalescence.</p> <p>Also it would be wise to avoid reference to the 'adopted' local plan as we expect the saved Gaps in that plan to be deleted when the new plan is adopted.</p>	<p>It may be incorrect but the NPWG acted on clear advice received from Hart. Direction for the NP to include a Local Gap was provided by; HDC NP Manager (K. Bailey) at a meeting with the CPC NPWG on 5th September 2017 the advice was that the 'NP could propose a Local Gap provided it was contained within the Parish and that the evidence was robust', also the Hart DC CEO (Mr D Phillips) advised the Chair of the NPWG directly, at a Local Plan briefing on Monday 5th February 2018, when questioned as to why HDC (Mr D Hawes) had not responded to CPC request to include a Local Gap in the Local Plan, that 'it was down to and expected within the NP. The reason why it had not been included was because HDC was not proposing any development sites adjacent to the Parish and that it would be down to the NP to propose any Gaps'.</p>

Para/ Page	Changes Requested	Reason	CPC Response
			Agreed. See other notes on best method to refer to Hart plan which is approaching adoption.
	<p>Recommend the following amendments:</p> <p>Development Pressures Overall the Neighbourhood Plan defines a selection of suitable sites which exceed the yield aspirations of the Objectively Assessed Housing Need for Crondall Parish and the District, however no sites within the Local Gap area are required to achieve the Plan.</p>	To reflect the fact that the emerging Local Plan does not allocate any housing to Crondall.	Accepted
Policy 5: Local Green Spaces	<p>Recommend deleting no. 5:</p> <p><i>The Neighbourhood Plan designates the following sites as shown on the policies map:</i> <i>1 Hook Meadow – 3.08 hectares to the North of Croft Lane and to the south of Well Road</i> <i>2 Farnham Road Recreation Ground – 1.56 hectares of land on Dippenhall Street</i> <i>3 Old Parsonage Meadow – 1.25 hectares of land adjoining Croft Lane</i> <i>4 Church Graveyard and Burial Ground – 1.26 hectares of land within the curtilage of All Saints’ Church, south of Croft Lane</i> <i>5 School Playing Fields – 0.511 hectares to the west of Glebe Road</i></p> <p><i>New development will not be supported on land designated as local green space except in very special circumstances.</i></p>	The wording of the policy needs to allow sufficient flexibility in terms of the use of the site to ensure the school is able to function throughout the plan period.	It is reasonable that the school (though the LEA) would need to robustly justify development on the playing fields, hence the designation should be retained.
Policy 9: Recreati on Areas	<p>This Policy has some overlap and conflict with designation as a Local Green Space which limits any development to only being acceptable in very special circumstances.</p> <p>Recommend deleting the following:</p> <p><i>The following sites are designated public open spaces.</i></p> <ul style="list-style-type: none"> • <i>Hook Meadow</i> • <i>Farnham Road Recreational Ground</i> • <i>School Playgrounds</i> • <i>Crandall’s Network of Footpaths</i> 	The wording of the policy needs to allow sufficient flexibility to ensure the school is able to function in terms of the use of the site throughout the plan period.	See comment on Policy 5.

Annex B: List of Abbreviations

CA	Conservation Area
CPC	Crondall Parish Council
CRON	Crondall site identifier
E-W	East – West
FZ	Flood Zone
GEN	General policy designation (Hart)
HRA	Habitat Regulations Assessment
LGS	Local Green Space
NBE	Rural policy designation (Hart Local Plan)
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
NPWG	Neighbourhood Plan Working Group
OAHN	Objectively Assessed Housing Numbers
OPM	Old Parsonage Meadow
PSP	Pre-Submission Plan
RUR	Rural policy designation (Hart)
SEA	Strategic Environmental Assessment
SHLAA	Strategic Housing Land Availability Assessment
SuDS	Sustainable Drainage Solutions
WG	Working Group

<ends>