

## Hart District Local Plan 2011 to 2032

### Comments from Rotherwick Parish Council and the Rotherwick Neighbourhood Development Plan Steering Group

#### 1 Introduction

- 1.1 This report sets out the observations of the Rotherwick Parish Council and the Rotherwick Neighbourhood Development Plan Steering Group on the current three related consultations on the emerging Local Plan as follows:
- Refined Options for Delivering New Homes
  - New Homes Site Booklet
  - Local Plan Vision and Strategic Priorities
- 1.2 This report addresses each of the three documents in turn. Where necessary it makes comments on the important overlaps between the documents
- 1.3 The report reflects the considered views of the bodies concerned. It making the various comments the two organisations have taken account of both national planning policy and the contents and approach of the emerging Rotherwick neighbourhood plan.
- 1.4 In progressing the neighbourhood plan to draft stage the local community has embraced the principles stemming from the Localism Act 2011. It has a clear and strong desire to introduce local and effective planning policies in the parish and which underpin and support the emerging local plan. To this end the two organisations welcome the opportunity to continue to be involved in this wider debate. This approach will ensure that both the district council and the parish council adopt a proactive and positive approach to the development of planning policy by working in a collaborative way in accordance with planning practice guidance (009 20140306)

#### 2 Refined Options for Delivering New Homes

- 2.1 The two organisations recognise the particular housing delivery issues that are been addressed in the emerging local plan. It is encouraging that the local plan is now being delivered to a refreshed timetable. As a community Rotherwick recognises the strategic importance of the adoption of a local plan and its obvious implications for providing a NPPF-based strategic templates for the District.
- 2.2 The community also recognises the importance of delivering the objectively-assessed housing needs of the district and are committed to taking an appropriate and agreed amount of new growth in the parish which both reflects in very distinct character and appearance and which reflects historic growth rates.

##### *Settlement hierarchy*

- 2.3 Comments are invited on a settlement hierarchy for the District. Paragraph 44 of the document sets out the existing settlement hierarchy and which dates back to 2010. Views are then sought of the appropriateness of using this hierarchy to inform the level of growth in the differing settlements. Rotherwick is identified as a Tier 4 Main Village.

2.4 The two organisations fundamentally disagree with any applicability of the 2010 settlement hierarchy to the emerging local plan strategy. This view is based around the following considerations:

- There is no evidence that the principles and information underpinning that settlement hierarchy have been reviewed. This is an area that conflicts with the requirement of this or any other local plan to meet the tests of soundness in paragraph 182 of the NPPF (in this case the *Justification* test).
- The settlement hierarchy is effectively an assessment of settlements in the district from a 2006 baseline (as set out in its paragraph 1.5). This is an area that conflicts with the *Positively prepared* test of soundness – by definition it is not addressing objectively-assessed development and infrastructure requirements
- The hierarchy predates the introduction of the NPPF. As such it fails to meet the *Consistent with national policy* test. This will be a key and a fundamental issue at the forthcoming examination of the emerging local plan. This point is reinforced in Section 4 with historic references to former national planning policies and to the former South East Plan.
- The hierarchy is not directly deliverable – its paragraph 1.3 is very clear that the hierarchy does not in itself amount to a spatial strategy and does not dictate the levels of growth that will go to different settlements. To this extent it fails to meet the *Effective* test of soundness as it does not set out to be deliverable over any period including that of the emerging local plan up to 2032.

2.5 There are also other internal inconsistencies in the design and the applicability of the 2010 Settlement hierarchy. These are summarised below:

- Paragraphs 7.9 and 7.10 make it clear that it is a matter for debate in relation to the distinction between Tier 4 and 5 settlements. To this extent its classifications are at times subjective
- The internal ranking system is unclear and inconsistent – South Warnborough is identified as the smallest settlement in Tier 4 as it has a shop but Rotherwick sits immediate above that village in the list of Tier 4 settlements but did not and does not have such a facility
- In any event Rotherwick’s place in the settlement hierarchy had changed between 2006 and 2010 without any explanation or evidence (paragraph 7.12)
- The community facilities identified in Rotherwick in Appendix 1 do not include any of the critical services now identified in the NPPF (see paragraph 2.7 below)

- 2.6 The Rotherwick community do not agree that the 2010 Settlement hierarchy provides a sound and reasonable basis for informing the acceptability of the dispersal of growth within the district. In the event that the District Council continues to wish to use a settlement hierarchy approach the Rotherwick community recommends that the hierarchy is supported by up to date information and is aligned with the key principles as now set out in the NPPF.
- 2.7 In this context the NPPF (paragraph 17) is very clear that a set of core land use planning principles should underpin plan-making. We submit that the following are critically important both to the future of Hart District in general, and to the future of Rotherwick in particular:
- Planning should be genuinely plan-led, empowering local people to shape their surroundings (including neighbourhood plans); and
  - Planning should take account of the different roles and character of different areas.... recognising the intrinsic character and beauty of the countryside; and
  - Planning should conserve heritage assets in a manner appropriate to their significance; and
  - Planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.
- 2.8 In summary the two organisations do not feel that the 2010 settlement hierarchy is directly relevant to the current debate on the location of housing in Hart district. In any event it is both out of date and inconsistent with the core principles underpinning the NPPF. The community also believes that any objectively-assessed and refreshed version of a settlement hierarchy would place Rotherwick in the lowest category (Tier 5).
- The different options to deliver new growth*
- 2.9 The two organisations have carefully reviewed the three strategic options for delivering the required housing in the District to meet the objectively-assessed need for housing.
- 2.10 They have concluded that Option 2 – Strategic greenfield extension represents the most appropriate, practical and deliverable option. This view is underpinned by the following considerations:
- The recognition in paragraph 52 of the NPPF that the supply of new homes can sometimes be best achieved through planning for larger scale development such as new settlements or extensions to existing towns
  - The ability of such sites to contribute effectively to the delivery of strategic infrastructure
  - The comments of Hampshire County Council and Thames Water as set out on page 8 of the document
- 2.11 The two organisation can also see similar strategic merits in the delivery of Option 3 – a new settlement. However, it is not favoured over Option 2 for two reasons. The first is its inherent uncertainty and which is reflected in its later planned delivery in the housing trajectory. This will have serious implication on the ongoing ability to demonstrate a five-year housing land supply. The second reason is that the preferred location has very limited existing services on which such a settlement could be based.

- 2.11 In terms of the potential combinations the two organisations support Option 5. This has the advantages of housing delivery both within and beyond the Plan period in a sensitive and sustainable fashion.

### **3 New Homes Site Options/Booklet**

#### *General comments*

- 3.1 The two organisations only make comment on the identified sites in Rotherwick.
- 3.2 The comments are significantly underpinned by the recent work undertaken to prepare the draft Rotherwick Neighbourhood Plan.
- 3.3 In principle the organisations consider that an overall figure of 70 new dwellings for Rotherwick in the Plan period is unjustified, disproportionate in scale and fundamentally in conflict with its distinctive character and appearance. This assertion reflects the very limited services within the village in general, and its lack of effective retail and public transport facilities in particular.
- 3.4 The community is also concerned that development of this scale will fundamentally impact on the tranquillity and character of the village. These factors are reflected in the Conservation Area character appraisal.

#### *SHLAA 86*

- 3.5 The community support the rejection of SHLAA site 86. It is poorly located in open countryside. It has no functional or sustainability relationship to the village

#### *SHLAA 87*

- 3.6 This site was extensively assessed as part of the preparation of the neighbourhood plan. It was comprehensively dismissed. The site is considered to be poorly related to the built format of the existing settlement and it would sit uncomfortably with its character and appearance. The regularity of the main part of the site would jar with the natural and organic growth of the village and would be likely to generate a suburban form of development. The site is also adjacent to the conservation area. There are also unresolved access issues, and the potential for additional traffic from the site to affect detrimentally the character of Wedhams Lane.

#### *SHLAA 115*

- 3.7 This site was also extensively assessed as part of the preparation of the neighbourhood plan. It performed well against other sites. Nonetheless it was not included in the Plan at draft stage given the steering group's confidence that historic build rates could be maintained through the application of general policies in the plan.
- 3.8 The site is of a sufficient size and location to be seen as a natural extension of the village. However, its proposed yield of 24 dwellings would conflict with the character and appearance of this part of the village in particular and with the general density of dwellings in the immediate area in particular. This site would only achieve local support and be included in the neighbourhood plan if its yield was substantially reduced.

*SHLAA 290*

- 3.9 This site was also assessed in the same fashion as sites 87/115.
- 3.10 It was dismissed given its impact on the character and appearance of the conservation area and given the uncertainty over access arrangements. In addition, its limited yield was not seen to offset the importance that this parcel of land provided to the open aspect of the village.

**4. Draft Vision and Strategic Priorities**

- 4.1 The Rotherwick community supports the general approach set out in the Vision. It reflects advice in the NPPF and seeks to deliver growth whilst protecting the character of the district
- 4.2 Particular support is directed towards the following elements:

*Key Issues*

4/5/6/7/11/12/14

*Vision*

Paragraphs 1/3/5

*Strategic Priorities*

6/7/9/10

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