

ROTHERWICK PARISH COUNCIL

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14th March 2018

Hart District Council

Civic Offices
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Dear Hart Planning Policy Team

Hart Local Plan Strategy and Sites 2016-2032 Proposed Submission Version Consultation

Rotherwick Parish Council has reviewed the Hart Local Plan 2016 - 2032 proposed submission version consultation documents and would like to make the following representations. These encompass aspects of the plan which are particularly relevant to Rotherwick Parish, such as the Natural and Built Environment Policies, and also strategic planning policies applicable across the District. We wish to highlight that of the representations made, the point in relation to Local Gaps in policy NBE2 is the one of greatest importance to Rotherwick Parish and its neighbouring communities.

Local Gaps (paragraphs 273-278, Policy NBE2, pages 71-72)

The Parish Council is concerned to discover that the land between Hook and Rotherwick has not been designated as a Local Gap in the Hart Local Plan 2016-2032. We are disappointed that this Local Gap has been omitted when it is strongly supported by residents of both communities and has been identified in the Rotherwick Neighbourhood Plan as an important Local Gap between Hook and Rotherwick. The land between Hook and Rotherwick is within the important historic Landscape Character Area of Tylney, identified in the Hart Landscape Character Assessment which forms part of the evidence base for the Hart Local Plan. The community values this attractive, high quality rural landscape which provides excellent amenity value through a network of public footpaths. The local community has consistently expressed concern about risks of coalescence with neighbouring settlements, and especially with Hook which has encroached significantly towards Rotherwick in recent years.

In the Rotherwick Neighbourhood Plan public consultation residents made it is clear that, the community wishes to maintain the Local Gap between Hook and Rotherwick. In addition, the Hook Neighbourhood Plan Steering Committee singled out the importance of maintaining this gap to avoid coalescence between Hook and Rotherwick and, also asked for this Local Gap to be identified in the Hart Local Plan.

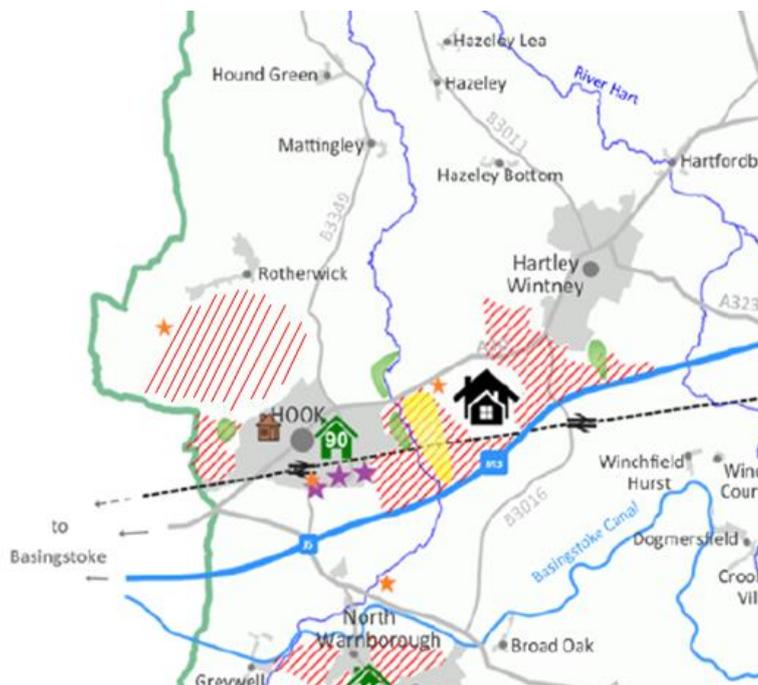
The primary function of a Local Gap is to prevent the coalescence of settlements, whilst they also serve to maintain the unique character of the respective settlements and conserve historic landscapes. The designation of a Hook to Rotherwick Local Gap would fulfil the landscape analysis gaps criteria, namely that (a) The land is predominantly open or undeveloped and provides a sense of separation between

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settlements, and, (b) The land performs an important role in maintaining the separate identity of settlements at risk of coalescence. The Parish Council's position is that the justification for a Local Gap between Hook and Rotherwick is strong, and more compelling in fact than the justification for the Local Gap between Hook and Newnham which has been identified in the Local Plan.

In the April 2017 (Regulation 18) consultation on the draft Hart Local Plan Strategy and Sites 2011-2032, the Parish Council submitted representations highlighting our concerns around development in the countryside and the risk of coalescence between Hook and Rotherwick. The Parish Council requested the inclusion of a gap in the Local Plan between Hook and Rotherwick, which would extend from the Local Gap identified between Hook and Newnham, along the northern settlement boundary of Hook and the southern settlement boundary of Rotherwick village to the B3349. The area proposed for the Local Gap between Hook and Rotherwick is shown in figure 1. below.

Figure 1 – Proposed Local Gap between Hook and Rotherwick settlements.



The Parish Council believes the land between Hook and Rotherwick is an important open green gap and, was regarded so by Hart District Council and designated as an "Important Open Gap" or "Strategic Gap" in previous versions of the Hart District Local Plan. The adopted Hart District Local Plan 1985 Policy ENV 16 identified an "Important open gap" to be retained between "Hook and neighbouring settlements to the west and north".

In the Hart District Local Plan (1st alteration) 1989 Policy ENV 4 on "Important open areas" specifically identified the gap from "Hook to Rotherwick" as an open area to be protected from development due to the threat of coalescence. The proposals map which accompanied the Local Plan 1989 showed the

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open gap area covered all of the land from Hook settlement boundary to Rotherwick settlement boundary and extended to the East along the B3349 and Hook Road and to the West to Ridge Lane.

In 1993 a planning application (Ref. HDC/22954) for a large-scale housing development on this land was submitted by a developer, Charles Church Southern Ltd. The application was refused by Hart District Council and the subsequent appeal (Ref. APP/N1730/A/93/230728) was also dismissed by the Planning Inspector who cited that the “proposal might jeopardise the proper definition of the ‘strategic gap’ between Hook and Rotherwick.” The developer later submitted a notice to the High Court challenging the validity of the Local Plan policy on the important open gap between Hook and Rotherwick, but the challenge was rejected by the High Court and the Government’s Planning Minister. In response to the Planning Inspector’s recommendation that the gap between Hook and Rotherwick should be more defined, an updated Hart Local Plan (2nd alteration) 1993 was adopted. In the adopted Hart Local Plan 1993, Policy ENV 14 on “Important open gaps between settlements” specifically identified the “Strategic Gap” from “Hook to Rotherwick” as an open area to be protected from development. The proposals map which accompanied the Local Plan 1993 showed a more defined open gap area from along the length of the Hook settlement (northern) boundary up to the natural ridge elevation on the land towards Rotherwick and, extending to the B3349 to the East and Ridge Lane to the West.

The Parish Council believes there is a significant body of historical evidence for the open gap between Hook and Rotherwick to be identified and retained, which was the decision upheld by the Planning Inspector and High Court. For these reasons, the Parish Council requests the reinstatement of the Local Gap between Hook and Rotherwick in the Hart Local Plan 2016-2032. This will ensure continuity with previously adopted Hart Local Plans, support the views of the local community and respect the Planning Inspectorate and High Court decisions. To further support the case, we have prepared a detailed landscape analysis against the Gaps criteria to demonstrate that the Local Gap between Hook and Rotherwick is justified, this assessment is enclosed at Appendix 1.

Settlement Hierarchy (paragraph 42, page 14)

All towns and villages have been categorised by tiers, described in the “Settlement Hierarchy for Hart District, 2010.” Rotherwick Parish Council does not agree with the classification of Rotherwick as a Tier 4 village within this document. We previously submitted representation during the consultation on Hart’s “Refined Housing Options and Vision & Strategic Priorities”, requesting that the classification of Rotherwick be changed from a Tier 4 to a Tier 5 settlement, since the 2010 document is no longer current and states the distinction between Tier 4 and 5 settlements was subjective. Rotherwick should not have been classified in Tier 4 as it has no shop or public transport, unlike the other villages classified in this Tier.

The “Settlement Hierarchy for Hart District, 2010” document predates the NPPF, as such it fails to meet the “Consistent with National Policy test”. Furthermore, there is no evidence that the principles and information underpinning the settlement hierarchy have been reviewed in preparing the Local Plan, this conflicts with the requirement to meet the tests of soundness in the NPPF. In January 2016 the Parish Council and the Rotherwick Neighbourhood Plan Steering Committee commissioned an independent planning consultant (Mr Andrew Ashcroft MRTPI) to prepare a report which assessed how the draft Hart Local Plan approach aligns with the Rotherwick Neighbourhood Plan. In this 5 page report approximately 2 pages were dedicated to concerns relating to the Settlement Hierarchy methodology and soundness of the “Settlement Hierarchy for Hart District, 2010” document, and questioned the rationale for classifying Rotherwick as a Tier 4 settlement. A copy of this report dated

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10th January 2016 is enclosed at Appendix 2. Therefore, in light of these concerns, we kindly request an up-to-date review of the settlement hierarchy and reclassification of Rotherwick as a Tier 5 settlement.

Surface Water (paragraph 320, page 84)

Rotherwick Parish has well known sewage infrastructure problems. The foul water system in Rotherwick suffers from ground and surface water ingress and has capacity issues; there have been instances of the Wedmans Lane Sewage Pumping Station (SPS) discharging overflow sewage into a watercourse adjacent to Blackwood SINC when it exceeds capacity during wet weather. The Parish Council does not agree with the wording of paragraph 320 (page 84) in the Hart Local Plan, which states “Applications involving discharging surface water to foul sewers are unlikely to be supported”.

The Parish Council believes that it would not be environmentally sustainable to over-burden the foul sewer by discharging surface water into the system when alternate surface water disposal options are available. We therefore ask that paragraph 320 be changed to state “Applications involving discharging surface water to foul sewers will not be supported.”

New Settlement (paragraphs 139-162, Policy SS3, pages 39-45)

Rotherwick Parish Council has given great consideration to Spatial Strategy Policy SS3 which plans for a sustainable new settlement within the Murrell Green/Winchfield area of search. We acknowledge that the Local Plan strategy for a new sustainable settlement is based on previous public consultations and the need to meet longer-term development needs within this plan period and beyond into future plan periods.

The Parish Council recognises the potential advantages of a new sustainable settlement in delivering large-scale infrastructure investment which would not be provided through small scale development. Whilst the Parish Council does not object to the principle of a new sustainable settlement outlined in Policy SS3, the precise nature of the proposals are unknown at this stage, and for this reason we cannot offer unconditional support to a new sustainable settlement without assessing the detailed New Settlement Development Plan Document (DPD) and Masterplan, to be published in future. Therefore, Rotherwick Parish Council reserves the right to make representations in support or in objection to future plans for the new sustainable settlement once detailed plans are published for consultation. Issues such as infrastructure, traffic, secondary school, environmental sustainability and water management will have to be planned carefully when producing the New Settlement Development Plan Document and Masterplan.

It should be noted that the Parish Council previously objected to a proposal for a new settlement located at Murrell Green during the April 2017 (Regulation 18) consultation on the draft Hart Local Plan Strategy and Sites 2011-2032. In this consultation we outlined the disadvantages of introducing a new settlement at Murrell Green, including the amalgamation of Hook and Hartley Wintney, increase in traffic on the congested A30 and environmental issues for future residents. In terms of coalescence, the Murrell Green location would result in urbanisation of the area around the A30 and effectively becomes one large urban settlement. The road network around the A30 is already very congested and a new settlement located at Murrell Green would exacerbate traffic issues and increase air pollution. In our consultation response we also highlighted potential concerns around sustainability, and that the area immediately adjacent to the site has previously been used for landfill

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purposes and may present a contamination risk, and that a high pressure gas main runs through the middle of the proposed site (registered with HSE as a Major Accident Hazard Pipeline).

Finally, in relation to a new sustainable settlement, the Parish Council understands the reasons for planning for a new sustainable settlement and how difficult development of a Local Plan can be. The District housing need has evolved and there are future unknowns around changes in the methodology used to calculate housing requirements and whether the anticipated delivery of sites will be achieved. There are advantages and disadvantages to planning to include a new settlement in the Local Plan, and we look forward to engaging with you in a collaborative manner in the interests of all Hart District residents.

Rotherwick Parish Council hope you find our representations helpful and constructive.

Yours faithfully

Susan Richardson

Susan Richardson
Clerk & Responsible Finance Office to Rotherwick Parish Council

Attachments:-

Appendix 1 - Assessment of the Hook to Rotherwick Local Gap.

Appendix 2 - Mr Andrew Ashcroft MRTPI Report on Hart Local Plan 2011-2032 consultation, dated 10th January 2016