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Planning Policy
Hart DC
Civic Offices
Harlington Way
Fleet
GU51 4AE

10 October 2014

Odiham Parish Councils response to Hart DC's Local Plan Consultation

Dear Daryl

Odiham Parish Council would like to formally respond to Hart with regards to the proposed Local Plan options that you are currently consulting on.

Specifically we would like to raise our concerns and strong objection to Option 5. This is based both on our analysis of the Option 5 against the National Planning Policy Framework (NPPF) and our own wider analysis of the options from the perspective of our Parish and its residents.

National Planning Policy Framework

Section 17 of the National Planning Policy Framework (NPPF) sets out 12 core land-use planning principles that should underpin both plan-making and decision-taking. Odiham Parish Council believes that 7 of these have particular relevance to the five Options put forward by Hart and that these 7 collectively make Option 5, the Special Protection Area Avoidance Strategy, incompatible with the NPPF. We state below these 7 principles and the reasons why Option 5 is incompatible with them.

According to the NPPF section 17 planning should:

1) proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.

Option 5 incompatibility - There is very limited existing business or industrial unit or infrastructure in the south-west area of Hart and so unless this is provided the provision of further housing in the area must be judged unsustainable. The economic viability of additional business or industrial units in the parish must however be considered improbable in view of the number of such units in the parish and Hart being either vacant or subject to pressure to convert to domestic use;

2) take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.

Option 5 incompatibility – the intrinsic character and beauty of the countryside around Odiham is well-known, encompassing as it does Sites of Special Scientific Interest at Odiham Common and the Basingstoke Canal, the Deer Park conservation area, a significant stretch of the Whitewater Valley, and the landscape of the North Hampshire Downs both in and beyond the south of the parish;

3) Contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework.

Option 5 incompatibility – as stated in (2) much of the land in and around the parish of Odiham is of acknowledged high environmental quality.

4) promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production)

Option 5 incompatibility – much of the land in and around the parish of Odiham performs wildlife, recreation, flood risk mitigation or food production functions

5) conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

Option 5 incompatibility – Odiham Parish contains 25% of the listed buildings in Hart and has three conservation areas all of which, collectively, make a significant contribution to the quality of life to residents in the parish and residents of Hart as well as the many people who visit the parish from outside the Hart District.

6) 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.

Option 5 incompatibility – there is a paucity of existing public transport and cycling provision which means that further development would very likely only exacerbate the existing inability of the parish to be considered a sustainable location for significant development.

7) take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

Option 5 incompatibility – There is a paucity of existing community, cultural facilities and services which means that further development would very likely only exacerbate the existing inability of the parish to be considered a sustainable location for significant development.

Local Plan summary

In addition to the conflict that Option 5 poses against the details laid out in the NPPF, Odiham Parish Council would also like to express our own summary of the Local Plan options and our associated concerns on behalf of our residents.

- It is noted that the Local Plan document recognises that neither our landscape nor heritage assets have been fully considered (3.43 and 3.47) though elsewhere within the documentation these assets are recognised as strong features of the area covered by Option 5. We believe that this should be more fully assessed and outlined by Hart before Option 5 can adequately be considered.
- Furthermore, in presenting Option 5, we feel that there has been a lack of consideration that our Parish is home to 25% of all listed buildings in Hart (see English Heritage web site) and 20% of the Grade 1 listed buildings. Odiham alone is described as containing one of the most outstanding collections of historic buildings in the county, a view also taken by the last Local Plan Planning Inspector who describes it as one of the least unspoilt small towns in the county. The Odiham Conservation Area Assessment of Setting document shows how hard it would be to choose more than a very few of the SHLAA sites.
- We would also note that the places most likely to take housing in Option 5 are west Hook, Odiham & North Warnborough, which are still within the 7km band of the SPA so not assured sites. Therefore, we would suggest that it is high risk to plan on these settlements without having done the necessary and appropriate assessments.
- Should Option 5 progress, then a significant detrimental effect on both landscape and heritage assets will occur. However, in addition to this, contrary to the statement within the 'Other benefits' section on page 61 of your Local Plan document, Option 5 would still substantially fail to deliver enough housing to meet Hart's needs and pose significant infrastructure issues even combined with Option 1. So should Option 5 progress, it would in our opinion achieve the worst of all worlds, through the damage to landscape and heritage assets without providing any protection of other areas in Hart.

In addition to our objection to Option 5, we would also object to Option 2 as note that the detail in the Local Plan document shows that in practice it skews development to rural settlements where there is land on offer which isn't available in the larger centers. In such a situation, in addition to the points outlined above, our Parish would still experience significant infrastructure issues – traffic, parking, doctors and health centers, education, water and sewage. We acknowledge that these issues are experienced in common already by residents across Hart, whether in or out of the SPA area, in large towns or small villages. However, provision of infrastructure will most effectively come from larger developments which can only reasonably be considered in already larger settlements. Whereas some of the other issues such as landscape and heritage assets, which are supposed to be considered and protected in the planning system, are not common to all parts of the district.

Odiham Parish Council understands the need for more housing. This is, in part, why we are undertaking our own Neighbourhood Plan. However, we strongly object to the level of houses that Options 5 and 2 would bring to our area, based on the issues outlined above. If a new settlement as outlined in Option 4 is not practical, then we would humbly request that a mix of Options 1 and 3 are given strong consideration based on their ability to leverage existing

essential infrastructure and in doing so limiting the impact to Harts landscape and heritage assets.

Yours sincerely

A handwritten signature in black ink that reads "Sarah Weir". The signature is written in a cursive, flowing style.

Mrs Sarah Weir
Clerk to Odiham Parish Council

Cc: Cllr Ken Crookes
Cllr Stephen Gorys
Cllr John Kennett
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