

FLEET NEIGHBOURHOOD PLAN

REGULATION 14 REPORT: JULY 2018

Purpose

1. The purpose of this report is to summarise part of the outcome of the consultation period on the Pre-Submission Fleet Neighbourhood Plan held from 14 May 2018 to 15 June 2018. The report reviews the representations made by statutory consultees, including the local planning authority – Hart District Council (HDC) – and by developers/landowners. It then makes recommendations for minor modifications to the Plan for its submission.

2. The report will be published by the 'qualifying body', Fleet Town Council, and it will be appended to the Consultation Statement that will accompany the submitted Plan in due course, in line with the Neighbourhood Planning (General) Regulations 2012.

Consultation Analysis & Recommendations

3. During the consultation period, representations were made by Hart District Council (HDC) and Hampshire County Council (HCC) officers and responses received from the statutory consultees; Historic England, the Environment Agency, Natural England. Representations were also received from Indigo Planning on behalf of McKay Securities PLC and Savills on behalf of Thakeham Homes. The following bodies also responded: Thames Water, The Police and Crime Commissioner for Hampshire, Church Crookham Parish Council and the North East Hampshire and Farnham Clinical Commissioning Group.

4. The summary analysis of these representations is provided in respect of each policy below, together with recommendations on making modifications for the final version of the Plan:

Policy 1 – Fleet Civic Quarter (Zone 1)

HDC make a number of comments regarding this policy and highlighted the potential for conflict between proposed boundary to 'The Views' Local Greenspace in the policy with that defined in Policy 13. They also highlighted the need to ensure the replacement or upgrading of essential infrastructure is a focus of the policy. They advise that an outline application for part of the land had been submitted which might compromise the comprehensive redevelopment of the whole site.

HDC also confirm that Fleet has a large number of properties at risk of surface water and sewer flooding in the town centre area and that Sustainable Drainage techniques (SuDS) should be encouraged in all new development (see also response to Policy 10). Addressing flood risk is a core planning principle, so while the matter will be addressed through the Submission Local plan (see paragraph 88 and 89 and Policy NBE6) the proposed policy largely applies only to major development.

HCC support the general principle of the regeneration of the Civic Quarter but would not wish to see the library facility compromised given recent investment. They also wish to see the retention of the current play facilities in the Civic Quarter.

Recommendations

The Steering Group should arrange to meet with the applicants and HDC Policy and Development Management teams as soon as possible to discuss the current planning application to determine the extent to which it may be considered premature given the impending submission of the neighbourhood plan. Agreement should be reached on whether the application has the potential to undermine the neighbourhood plans 'flagship' policy or whether as suggested by HDC there may be a need to modify the policy to acknowledge the application. The SG should note that the neighbourhood plan gains weight at the end of the Regulation 16 publicity period (NPPF para 216 and draft NPPF para 49 – 51).

The SG should also maintain contact with HCC's Library Service and to maintain this liaison as the policy is taken forward.

Modify Clause 2 of the policy to ensure there is no overall loss of play provision and amend the boundary of 'The Views' Local Green Space in line with Policy 13.

Incorporate an additional explanatory statement on local surface water flood risk in Policy 10 (General Design Management Policy) reflecting paragraph 89 of the Submission Local plan.

Policy 2 – Land between Victoria Road & Gurkha Square (Zone 1b)

HDC indicate a number of suggested modifications to the Town Centre Policies (policies 2 – 9) and the need to review and amend policy boundaries on the maps. These are generally minor and their submission clearly explains the reasoning behind the modifications; for brevity this note avoids repeating HDC's comments.

HDC reference policy ED5 of the Submission Local Plan, and it is assumed they are treating ED5 as a strategic policy and hence alerting the NP group to a potential minor conformity issue should ED5 remain unchanged upon adoption.

Recommendation

Given the advanced stage of the emerging Local Plan, modify all town centre policies to address HDC's comments regarding conflict with ED5. Move final paragraph of Policy 2 to the first sentence of the supporting text in paragraph 2.34.

Policy 3 – Land on the corner of Reading Road North & Fleet Road (Zone 1c)

Modify policy to address HDC's comments regarding conflict with ED5 and update policy maps to reflect location of Gurkha Square

Policy 4 – Land off Harlington Way (Zone 1d)

No comments

Policy 5 – Leisure and Night Time Economy – Fleet Road between Upper Street & the Oatsheaf crossroads (Zone 2)

Recommendations

Modify policy to address HDC's comments regarding conflict with ED5

Policy 6 – Fleet Primary Shopping Area (Zone 3)

HDC confirm potential conflict with emerging Local Plan policy ED5 – Fleet Town Centre. In addition, HCC comment on the public health impacts resulting from a proliferation of A5 outlets (takeaways) and suggest a balance should be struck between use classes A1 - A5.

HCC state that this zone lies in the setting of the Grade II* listed Church of All Saints.

Recommendations

Modify policy to address HDC's comments regarding conflict with ED5 by amending policy title and introduce A3-A5 use restrictions into the policy text as suggested. Address additional points of clarity and conflicts with parking policy.

Review the findings of the Food Environment Assessment tool and consider whether as a result some restriction on A5 use, by way of a limit, should be introduced into the policy or as a trigger in the supporting text.

The policy or supporting text should reference the potential impact on the heritage asset.

Policy 7 – Fleet Road between No. 151 Fleet Road and Kings Road Junction (Zone 4)

HDC suggest greater clarity is needed on how small family apartments should be defined.

HCC confirms Zones 4 and 6 are within the setting of the North Fleet Conservation

Recommendations

The SG should review policy H6 and Appendix 3 of the Submission Local Plan which defines the internal space standards for new homes based on the Nationally described space standards and adopt the gross internal floor area threshold to deliver its policy objective and define this in the policy; and reference Policy H5 in the supporting text.

The supporting text to the policy should acknowledge this zone is within the setting of the North Fleet Conservation Area and development should therefore sustain or enhance the special interest, character and appearance of the area.

Policy 8 – Land at Albert Street (Zone 5)

Recommendations

Correct mapping errors as recommended by HDC.

Policy 9 – Fleet Road Public Realm (Zone 6)

HCC welcomes clause (iii) and suggest an additional criterion that development should respect the setting of the Church of All Saints.

Recommendations:

Incorporate amendments to policy as suggested in HDC's response to provide additional clarity on SuDS requirements.

Policy 6 acknowledges the location of the Church of All Saints and the need to respect its setting.

Policy 10 – General Design Management policy

HDC recommend a number of helpful amendments to the policy clauses to reduce ambiguity. They also confirm that Fleet has a large number of properties at risk of surface water flooding and that Sustainable Drainage techniques (SuDS) should be encouraged in all new development, especially permeable and bio-retention techniques. They also suggest amendments to the wording of the policy to ensure any removal of amenity trees is adequately justified at planning stage.

Thames Water make similar recommendations regarding SuDS.

HCC welcome this policy and its reference to the Urban Characterisation Study.

The Environment Agency make no specific comments on individual policies; however, they confirm that a number of rivers in the neighbourhood plan area, including the Fleet Brook, the Pine Grove Stream, the Gelvert Stream, the Sandy Lane Ditch and the Hart are failing to reach good ecological status/potential under the Water Framework Directive. The Fleet Brook is currently classified as having moderate status, whilst the Hart is currently classified as poor and the Basingstoke Canal, moderate.

Recommendation

Incorporate all amendments to policy as suggested in HDC's response to provide additional clarity to design management requirements.

An additional clause could be added to Policy 10 which highlights flood risk issues Reference to the Strategic Flood Risk Assessment should be added to the supporting text of the policy.

Policy 11 – Safeguarding bungalow stock for an ageing population

HDC suggest a minor modification to the policy if the intention is to support new build bungalow replacements.

Recommendation

The SG should clarify its intentions in this respect.

Policy 12 – Buildings of Local Heritage and Townscape Value

HDC suggest an adjustment to policy to improve clarity

The policy is welcomed by Historic England, stating that non-designated heritage assets, such as locally important buildings, can make an important contribution to creating a sense of place and local identity.

Recommendation

Redraft the policy to improve clarity and include the criteria in the supporting text or in Appendix. OH can provide an alternative policy wording if required.

The SG may also wish to reflect HE's comments in the supporting text.

Policy 13 – Local Green Space

HDC comment on the need to include the boundary of each Local Green Space on the Policies Map and to update the policy wording.

Recommendation

OH can provide a revised policy wording which reflects HDC's comments. All Proposals Maps should be updated in line with normal conventions. Clarification on the status and boundary of the views is required and should also be included in revision to Policy 1.

Policy 14 – Basingstoke Canal Conservation Area

Natural England reference this policy in their submission and indicate that any works or development completed near the canal should incorporate safeguards to ensure that the SSSI features are protected and contamination or pollution is prevented.

HDC recommend the policy wording is revised to reflect the requirements of the NPPF and recommend deletion of the clause that requires tree and hedgerow management which cannot be required through planning policy.

Recommendation

Amend the policy to ensure the area is protected and preferably enhanced in line with its management objectives. An additional clause could be added to the policy to give this effect and the policy and supporting text could also acknowledge the joint designation of the canal (as a SSSI) in addition to its heritage status.

Policy 15 – Residential Gardens

HDC have made extensive comments on this policy and on Policy 16 in their submission and for brevity they are not repeated here.

Recommendation

The SG should note the detailed modifications suggested by HDC.

Policy 16 – North Fleet Conservation Area

The Police and Crime Commissioner suggest the policy be modified to encourage a greater proportion of off-street parking to reduce the level of on-street parking. However, a planning judgement needs to be made between the impact of the design of development and loss of green landscaping compared to the impact on the street scene and levels of on-street parking which the submission indicates could be a problem but is not specific as to what problem would ensue.

Recommendation

No amendment to policy is recommended nor would a policy that restricts on-street parking be enforceable unless accompanied by other on street parking restrictions which fall outside the role of land use planning.

The SG should note the detailed modifications suggested by HDC and incorporate accordingly.

Policy 17 – Thames Basin Heath SPA Mitigation

HDC recommend the acronym SANG is defined in the policy.

Policy 18 – Cycling Network

HCC indicate the importance of land use planning in supporting improved public health outcomes. As the Highways Authority, they also note that the identified Cycle Routes and their implementation will be subject to feasibility assessments. HDC make similar comments related to funding routes. The Town Council may choose to fund such routes themselves through any CIL contributions it may receive (see final bullet point paragraph 4.5 of Pre-Submission Plan). See other comments on paragraph 4.5 from HDC

Recommendation:

Incorporate minor change to policy to incorporate the term “where appropriate”

Policy 19 – Parking

HDC make some helpful observations on how the policy should be refined and justified.

Other Comments & Analysis

In addition to the analysis above, Hart District Council make a number of suggested textual changes to the Pre-Submission Plan to update the plan and to improve its readability and these minor changes should be incorporated into the Submission version.

Hampshire County Council wish to see a greater acknowledgement of the role of land use planning in promoting public health. A statement to this effect could be incorporated into section 1 (Profile of the Town) and Policy 18 amended to support 'active travel'.

Historic England welcome the description of the historical development of Fleet. They suggest reference to the North Fleet Conservation Area Appraisal should be included in paragraphs 1.40 – 1.43 and the plan should also reference the Basingstoke Canal Conservation Area and include some descriptive text and they recommend the heading Conservation Areas (a heritage term) is rather confusing when the text below refers to nature conservation. They also recommend corrections to a number of listed buildings and factual errors to the citation of listed buildings.

Thames Water cite NPPF paragraphs 156 and 162, the former requiring local planning authorities to include strategic policies to ensure the delivery of water supply and waste water infrastructure. As a strategic policy, this is matter for the Local Plan to address. They also comment on the importance of SuDS and the policy recommendations above recommend this modification.

Church Crookham Parish Council confirmed their support for all 19 policies and suggested an additional policy should be introduced to cover Transport and Highway considerations on new development. The neighbourhood plan includes policies to enhance Fleet Road, create new cycle networks and encourages adequate car parking in new development. Other transport matters are considered a strategic matter and Policy 13 of the Submission Hart Local Plan responds to the matters raised by encouraging modal shift and requiring robust travel plans on major development.

The North East Hampshire and Farnham Clinical Commissioning Group provided comments for information on a recent study of GP practice capacity in Fleet which favoured making best use of existing healthcare infrastructure wherever practicable, including all four existing GP premises, and retaining and improving Fleet Community Hospital as the locality-centric campus for continuing the co-location & delivery of community services. The CCG also confirmed they were working closely with Hart DC and HCC to ensure healthcare proposals were included in the Hart DC Infrastructure Delivery Plan.

Savills on behalf of Thakeham Homes comment on their client's proposal for Land at Brook House north of the M3. The submission confirms the proposal lies outside the designated neighbourhood plan area, is generally supportive of a number of policy

areas including policy 13, 17 and 18. Thakeham Homes indicate their wish to communicate their proposals, and the Town Council, rather than the neighbourhood plan group, may be better placed to attend such a meeting.

Summary

In conclusion, it is considered that with a combination of minor modifications to the final submission document and Policy Maps and some clarifications made in the other documentation, the Plan can proceed to Submission, rather than require another pre-submission consultation.