



REH01 – Highways England

REH02 – Environment Agency

REH03 – [REDACTED]

REH04 – National Grid

REH05 – Southern Planning Practise obo [REDACTED]

REH06 – Southern Planning Practise, [REDACTED]

REH07 – Southern Planning Practise obo [REDACTED]

REH08 – Southern Planning Practise obo [REDACTED]

REH09 – Southern Planning Practise, [REDACTED] (2)

REH10 – [REDACTED]

REH11 – East Hampshire District Council

REH12 – [REDACTED]

REH13 – [REDACTED]

REH14 – Next Phase obo [REDACTED]

REH15 – Historic England

REH16 – [REDACTED]

REH17 – [REDACTED]

REH18 – [REDACTED]

REH19 – Pegasus obo [REDACTED]

REH20 – GVA obo [REDACTED]

This document provides the representations submitted as part of the Regulation 16 Consultation of the Neighbourhood Planning (General) Regulations 2012 to the Ropley Neighbourhood Plan.

East Hampshire District Council (EHDC) published the Ropley Neighbourhood Plan and submission documents for consultation between the dates of Friday 14 December 2018 – Friday 25 January 2019, in accordance with Part 5 of the Neighbourhood Plan (General) Regulations 2012.

Representations were submitted during the publicity period by 20 respondents.

Paper copies of the representations can be viewed on request at East Hampshire District Council, Penns Place, Petersfield, Hampshire, GU31 4EX.

A summary document will be available shortly. The neighbourhood plan and submission documents can be found on the council's website here - <http://www.easthants.gov.uk/ropley-neighbourhood-plan>

FORMAL RESPONSE: #6482 Publication of Consultation - Ropley Neighbourhood Plan Regulation 16

GB

Wed 19/12/2018, 13:50

EHDC - Neighbourhood Plans Shared; Planning SE

Reply | v

Ropley reg 16 (EHDC - Neighbourhood Plans Shared)

Our Reference: 6482

FAO: Planning Policy – East Hampshire District Council Publication of Consultation - Ropley Neighbourhood Plan Regulation 16

Thank you for inviting Highways England to comment on the above.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M3 motorway.

We have reviewed Ropley Neighbourhood Plan regulation 16 submission documents and have no comments.

I hope the above information is useful, please do not hesitate to contact me if you have any queries.

Regards

Assistant Spatial Planning Manager (Area 3)

Highways England |

Tel: +44

Mobile:

Web: www.highwaysengland.co.uk

Registered Office:

Highways England Company Limited registered England and Wales number 09346363

Ropley Neighbourhood Plan

RA

Mon 07/01, 13:58

EHDC - Neighbourhood Plans Shared ▾

↩ Reply | ▾

Ropley reg 16 (EHDC - Neighbourhood Plans Shared)

Dear Sir or Madam,

Thank you for consulting the Environment Agency on the above Neighbourhood Plan.

We are a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans.

Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf

We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.

Flood Risk

We are pleased to see that the proposed allocations have been directed to the areas at the lowest probability of flooding and that they are all located within Flood Zone 1.

Groundwater Protection

We note that all the sites shown in the map on page 81 are located on Principal aquifer and/or Source Protection Zones 2 & 3. Developments in this area will need to have regard to the sensitivity of the groundwater in the area.

We recommend that the Neighbourhood Plan references our guidance "The Environment Agency's approach to groundwater protection" which can be found on the gov.uk website -

<https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Should you have any queries regarding the above, please do not hesitate to contact me.

Kind regards,

Sustainable Places Advisor | Solent and South Downs Area

Environment Agency |

Direct dial:

Ropley Neighbourhood Plan

GG

Mon 07/01, 19:43

EHDC - Neighbourhood Plans Shared

Reply | v

Ropley reg 16 (EHDC - Neighbourhood Plans Shared)

With respect to the consultation process on the Ropley Neighbourhood Plan I have the following observations.

A summary of these comments is that Ropley Parish being an amorphous entity appears from the plan to be split, such that that the main focus, as always, will be on what is loosely termed the village centre and the rest being regarded as just "clusters" of housing. This I think creates an "us and them" mentality within the village leaving the centre as separate from the rest leading to "the rest" perhaps feeling not part of the village, and as an issue this is acknowledged but not really addressed. It was raised during the development phase of this plan, querying why there were settlements and then "just clusters", what constituted a settlement and why and what could be done to make the village more cohesive. This was not acknowledged individually but the plan as submitted now has "coalescences", which just seems to confuse things further.

The plan notes that the parish residents wish to keep separate from developments in surrounding villages and not be consumed into Four Marks for example, which it seems to achieve, but then goes on to keep parish residents separate from each other which I don't think they requested. To this end, it notes that there are half a dozen settlements around the village and the rest now being lumped into "coalescences", (what I termed above, "clusters", a term the plan uses) spread out away from the "centre" of the village. Nowhere does the term coalescence get explained, although there are gaps defined to keep them from merging or spreading, or why there is a need for something other than settlements. The aim appears to be to prevent uncontrolled development from "filling in" the village and joining the outer edges to the village centre. This is a laudable aim but why make it so complicated by having different types of housing area around the periphery of Ropley?

Is a coalescence really the same as a settlement and if not what is the difference? Is it defined by size, location, amenities? What legal basis does it have? Do they have boundaries and how are they defined? How are "coalescence gaps" defined, or do the gaps define the coalescence boundaries? If they are not defined, planning will always trip over what policy applies where. A settlement has a boundary and a policy associated, so a settlement gap can be clearly defined and policy inside and out be seen, defined and understood. A coalescence looks just like an exercise in semantics to avoid defining large clusters of houses as settlements and setting policy and boundaries.

How are settlements decided as being settlements? What are the criteria? Do Ropley Parish or EHDC decide this area is a settlement and that is not? If so why are some settlements smaller than so called coalescences? This especially after some planning applications caused the Government Planning Inspectorate to determine at appeal that an area is residential, but is still not regarded as being a settlement by the local councils. Do the councils wish to avoid defining any more settlements and if so why?

Does the above stem from the EHDC adopted local plan that states somewhere that there will be no development south of Petersfield Road. If this is so will this plan change that thinking?

Reply | ▾ Delete Junk | ▾ ...

the north edge of the South Downs NP and Ropley Parish Council is canvassing local opinion as to whether there is a desire to apply to join the park. Will all the effort in producing a Ropley Neighbourhood Plan to be incorporated into the EHDC local plan be wasted if it is decided to pursue integration of Ropley Parish into SDNP? Just the planning aspects inside a NP are different and more onerous to being in a district as one example; will there be a benefit that justifies the cost that may be incurred in redoing this plan if it is decided to pursue entry to SDNP, or should this exercise be delayed until the SDNP issue is agreed?

The plan also covers housing development, roads/lanes and retention of the feel of Ropley but doesn't address the broader development of peoples desires for good communications, utilities and services, including from councils, and the costs involved in their supply. The danger in retaining the status quo is that the village becomes a dormitory and housing costs escalate but services stagnate. Where is the vision of Ropley 20 years hence and what steps are being taken to prod telecoms and utility suppliers by the councils etc., and by the councils themselves to update Ropley's infrastructure and develop the village. Indeed is this what the residents actually want or is the past village survey really correct in suggesting that they want to retain Ropley "in aspic".


Please inform me at my email address above of the outcome of the examination by EHDC of the Ropley Neighbourhood Plan.

Planning Policy
East Hampshire District Council
Penns Place
Petersfield
Hampshire
GU31 4EX

████████████████████
Consultant Town Planner

Tel: ██████████
████████████████████

Sent by email to:
neighbourhoodplans@easthants.gov.uk

17 December 2018

Dear Sir / Madam

**Ropley Neighbourhood Plan Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

About National Grid

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

Specific Comments

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High-Pressure apparatus.

National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.

Key resources / contacts

National Grid has provided information in relation to electricity and transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

██████████
██████████
██████████
United Kingdom
Tel +44 ██████████
woodplc.com

Wood Environment
& Infrastructure Solutions UK Limited
Registered office:
████████████████████
Registered in England.
No. 2190074



Electricity distribution

The electricity distribution operator in East Hampshire Council is SSE. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

[REDACTED]
Consultant Town Planner

[REDACTED]
Development Liaison Officer, National Grid

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

Yours faithfully

[via email]

[REDACTED]
Consultant Town Planner

cc. [REDACTED], National Grid

Ropley Neighbourhood Plan

Fri 11/01, 15:48

EHDC - Neighbourhood Plans Shared; [REDACTED]

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Ropley Neighbourhood ... v
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Hi,

I attach objections and representations to the Ropley Neighbourhood Plan.

Please note that there is an objection on the grounds that the RNP is legally non-compliant and unsound and it may be a good idea to review that asap in case you have to cancel the current consultation.

Best regards

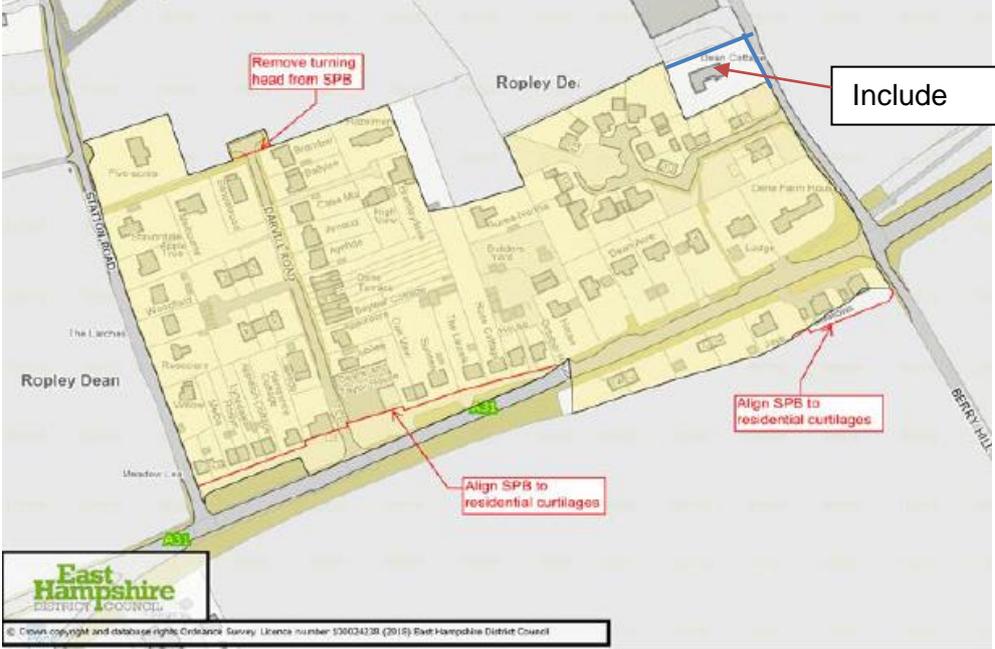
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	<p>the gestation of the RNP and proposals for LGS the RNP is unsound and the RNP is not legally compliant. This is explained further below under policy RNP8</p>
<p>Policy RNP2: Settlement Policy Boundaries</p>	<p>RNP2 Map 1 – Ropley Dean</p> <p>Objection is made to the settlement policy boundary shown on the map.</p> <p>Representations: The settlement boundary shown on map 1 should be re-drawn to include Dean Cottage along with the 15 new houses as it makes no sense to exclude this single dwelling adjacent to the proposed settlement policy boundary now that it is seen and read as being part of the built-up area of Ropley Dean.</p> <p>The RNP group’s reason for not including Dean Cottage is that it is subject to an agricultural tie which prompts the response ‘so what’. The proper planning consideration is whether Dean Cottage is in the countryside or is now part of the built form and community at Ropley Dean. The agricultural tie is an irrelevance.</p> <p>The rationale for including Dean Cottage is that it does not now stand ‘detached’ and within agricultural land as it previously did but is subsumed within the extension of the built form of Ropley Dean and cannot now be regarded as countryside. See plan below.</p>  <p>The spelling of Ropley Dean needs to be corrected in policy RNP2</p>
<p>Policy RNP3: Vistas and visual prominence</p>	<p>RNP3: Map 1 and subsequent maps of village centre (pages 34 and 40)</p> <p>Objection is made to the identification of key vistas</p> <p>Representations: This policy concerns two themes - vistas and visual prominence. The definition of key vistas is understood but the application of that definition is flawed in so far as Map 1 is concerned. The extract from Map 1 below shows the two vistas from position C of a modest arable field that should be omitted for the reasons explained below.</p>



The alleged vistas from a point west of the recreation ground are not of areas of significant visual prominence (the field is not identified as an area of significant visual prominence on RNP3: Map 2). They are simply views of an arable field of no special visual or landscape merit and those views are curtailed by the field boundary tree and hedge lines to the north and west. Although the RNP says that a comprehensive survey of the Parish has identified areas of significant visual prominence and the locations that are key vistas it has not been possible to review this survey as it is not included in the RNP background evidence base.

The vistas identified to the north and west, positions B and D, are more properly of the wider landscape and historic parkland at Ropley House. No objection is raised to them.

If an area is of significant visual prominence (which the field isn't) it must surely be more than just an enclosed modest field and it must be visible in the landscape from important viewpoints. That isn't the case with the 'key vistas' from point C. Moreover, the RNP does not identify this modest field as having significant visual prominence. This individual field is not visible from a number of viewpoints; let alone important ones - where ever they may be. In the latter respect there is nothing in the RNP that identifies where this particular field would be visible from and thus how, if it were to be developed, it would have a negative visual impact on the landscape. The two vistas at point C should be omitted from Map 1 and the maps on pages 34 and 40.

The RNP response to earlier representations wrongly conjoined the vistas at points B, C and D when it is very obvious that the key vistas from points B and D are completely different in scale and outlook from those from point C. The RNP response in the Consultation Statement is unsound and did not properly deal with or meaningfully respond to the earlier representations.

Importantly policy RNP3 should not be proceeded with without the full and proper disclosure of the alleged evidence on which it is based.

<p>Policy RNP8: Local Green Spaces</p>	<p>Objection is made to site LGS2 and the gestation of policy RNP8</p> <p>Representations: Local green space site LGS2 is an arable field with public rights of way on its southern and western boundaries and crossing diagonally. The users of the rights of way do so in the context that they have no other rights to use the arable field as this is not access land. The RNP does not show it to be an area of particular visual significance.</p> <p>The proposed LGS sites have been identified and pursued in flagrant contravention of the requirement for there to have been early consultation with land owners required by paragraph 019: reference ID 37-019-20140306 of the National Planning Practice Guidance. At no time have the RNP team been in discussion with the landowner. The process adopted by the RNP group is thus unsound and flawed and the RNP groups cavalier attitude is unreasonable and unacceptable. Proceeding with the designation of site LGS2, and other LGS sites, flies in the face of National Planning Practice Guidance and should be rejected without any further consideration.</p> <p>If on the other hand policy RNP8 is considered by the Examiner the following representations would fall to be considered.</p> <p>The point of an LGS is that a designation that should only be used to rule out development and serves a long-term role. However, the designation of an LGS must take account of a number of factors including identifying land as LGS should be consistent with the local planning of sustainable development and should complement investment in sufficient homes, jobs and other essential services.</p> <p>The field is a potential development site now and in the future. It is well located to the village centre and could provide valuable homes of a variety of sizes, form and tenures as well as additional recreational facilities to complement those of the adjacent recreation ground. Placing an LGS designation on the field will unreasonably restrict those sustainable development principles from being considered.</p> <p>The Framework provides for communities to <i>“identify for special protection green areas of particular importance to them”.</i></p> <p>There is no evidence to show what the <i>‘particular importance’</i> of walking the margins of or across an arable field are. Importantly the claim in the RNP that <i>“villagers greatly value the ... views out from it (the field) to open countryside”</i></p> <p>is false as there are no such views as recognised by the field not being included as an area of significant visual prominence or there being key view points on RNP3: Map 2</p> <p>Moreover, the Framework at paragraph 100 cautions that LGS designation should only be used where the green space is demonstrably special to the local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.</p>
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	<p>The explanation for proposed designation on page 37 of the RNP is wrong in almost all respects in that it attributes qualities to the field that simply don't exist. For example, the last sentence of paragraph 7.033 relates to views from the vistas at points B and D and is completely irrelevant to the field itself which has no historic significance whatsoever. simply does not provide a case that the land is demonstrably special to the community. It is also extremely doubtful that school children living in Ropley use the footpath and cross the field to reach school buses on the A31 except perhaps in good weather in the summer term.</p> <p>It is submitted that in this case, seeking an LGS designation for site LGS2 has nothing to do with demonstrable special qualities and particular local significance but is simply a device to sterilise the site from being considered for development in the future and this is the driver behind designation. This is not the correct approach. There must first be special qualities and particular significance to warrant an LGS designation - if there isn't then an LGS designation is uncalled for.</p> <p>The problem with LGS2 is that it has been given a vista significance for which there is no published justification and the significance of views of the field have been exaggerated. It is only when leaving the field at its south west and north west corners is there any view of the wider landscape and the historic landscape of Ropley House. The explanation in the RNP that the LGS2 site has views across the adjacent parkland and these are an important part of the historic setting and landscape context for Ropley House misapplies what is actually the case. Yes the views of the parkland are important but those views do not apply within the proposed LGS designation. As a result, the justification for the LGS designation is misplaced and unreasonable There simply is nothing about being able to walk across or on the boundaries of the field that makes it special to the local community especially as that enjoyment would continue without an LGS designation.</p> <p>LGS2 should be omitted from the RNP.</p>
<p>Policy RNP18: Amount of new housing</p>	<p>Objection to amount of new housing</p> <p>Representations: The RNP has been progressed under the aegis of the adopted East Hampshire District Joint Core Strategy, hence why its plan period is to 2028. On the face of it that seems a reasonable approach to take but District Local Plan policy is in the process of being reviewed and changed which casts grave doubt about whether the RNP should be proceeded with at this time.</p> <p>Notwithstanding any other representations that may be submitted on behalf of the Dean Farm Partnership the RNP should not be progressed until the outcome of three key planning policy matters have been settled because they, individually and cumulatively, could have a major impact on the approach being taken in the RNP. The issues are:</p> <ul style="list-style-type: none"> • The review of the East Hampshire District Joint Core Strategy (JCS) has been completed a new Local Plan to 2036 is about to start its Regulation 18 consultation. That includes additional housing at Ropley which the RNP is silent about.

- | | |
|--|--|
| | <ul style="list-style-type: none">• The Government review of the assessment of a district's housing requirement that has still not been settled.• The lack of clarity in the South Downs National Park Local Plan about how its planned shortfall in meeting its housing requirement is to be dealt with and how it adjacent MPs and district Local Plans might or will pick up the shortfall which is in the region of 3,750 homes |
|--|--|

The outcome of all three could have a profound outcome for RNP and could generate a requirement to reconsider the approach in policy RNP18.

For these reasons the RNP should not be progressed until those issues have been settled.

REH06

Ropley Neighbourhood Plan

Tue 15/01, 11:47

EHDC - Neighbourhood Plans Shared

Reply

Inbox (EHDC - Neighbourhood Plans Shared)

This message was sent with high importance.

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It is obvious from the Reg 15 Consultation plan that the Ropley Neighbourhood Plan is not legally compliant in that it has not been prepared on the basis of the National Planning Policy Framework July 2018. This point was raised in my email of 11 January. What is being done about the failure to be legally compliant, is the consultation process being aborted?

Best regards

[REDACTED] BA MRTPI

Associate Director

Southern Planning Practice Ltd

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Ropley Neighbourhood Plan

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Tue 15/01, 11:54

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Hi,

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Please note that there is an objection on the grounds that the RNP is legally non-compliant and unsound and it may be a good idea to review that asap in case you have to cancel the current consultation.

Best regards

[REDACTED] BA MRTPI

Associate Director

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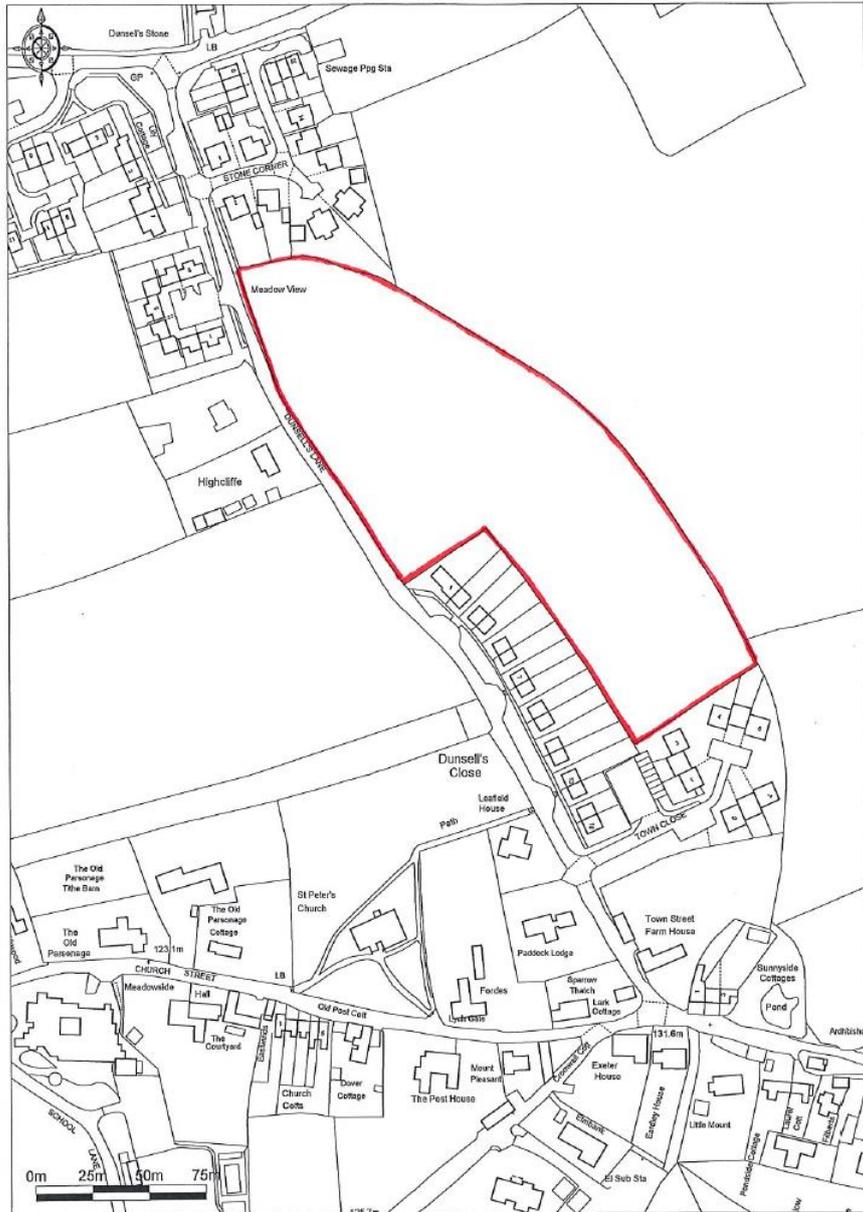
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Ropley Neighbourhood Plan
Regulation 15 Submission consultation representations

Your name	██████████
About you	Planning consultant representing a land owner
Representing	██████████
Company	Southern Planning Practice
Your address	██████████ ██████████ ██████████ ██████████ ██████████ ██████████
Email address	██
Introduction	The following abbreviations have been used in these representations on the Ropley Neighbourhood Plan: EHDC - East Hampshire District Council Framework - National Planning Policy Framework JCS - East Hampshire Joint Core Strategy aka Local Plan 1 LGS - local green space RNP - Ropley Neighbourhood Plan SDNP - South Downs National Park
Legal Compliance and soundness	1. Objection is made that the RNP is legally non-compliant and therefore unsound. Representations: The RNP should have been prepared in accordance with the National Planning Policy Framework July 2018. Unfortunately, it has been prepared on the basis of the superseded Framework dated March 2012. Paragraph 214 of the current Framework makes it clear that the policies of the previous Framework will only apply to Plans submitted before 24 January 2019. The current RNP is at consultation stage and will not be a submitted plan on that date. It is, therefore, not legally compliant and as a result unsound. This failure means that the RNP has not addressed section 5 of the Framework and it cannot be said that it meets the ideals of paragraphs 59 – 69 thereof.

Policy RNP1 settlement & coalescence gaps	<p>Objection is made to the identification of land at Dunsells Lane as part of a coalescence gap</p>
	<p>Representations: The rationale for keeping individual clusters of development at Ropley separate is to prevent the elimination of historic gaps between clusters. The land at Dunsells lane has been identified as a coalescence gap for that reason. But there is nothing ‘historic’ about the land or the gap other than it has not been developed. It is for example not part of an historic landscape or park and garden but is simply undeveloped land. Although not specifically stated to be the case, there is a clear expectation in the RNP that these gaps will have some longevity. In which case only those areas that would serve a long term planning purpose should be identified as gaps.</p> <p>The rationale for a coalescence gap is thus simply to prevent coalescence of built parts of the village. Generally speaking those coalescence gaps shown on RNP1: Map 1 are also areas of significant visual prominence (the one exception being land between the village and Gilbert Street) and the Dunsells Lane land. Keeping the land at Dunsells Lane free of development serves no landscape purpose it is simply a device to keep separate distinct clusters of built form without there being any planning purpose in a settlement where the built form is largely linear along the internal roads.</p> <p>Including the Dunsells Lane land in a coalescence gap makes no planning sense and would deny the opportunity to make provision for local housing on land which by the terms of the RNP is not landscape sensitive. It is thus a policy that just says no to development without considering the potential for development. It is an unsound approach to land use planning and the consideration of housing needs and requirements.</p> <p>It is submitted that there is great potential to develop the land at Dunsells Lane and including it as part of a coalescence gap would frustrate the consideration of allocating that site for development in the future when it might be one of only a few sites at Ropley with development potential. Given the short life of the RNP to 2028 and the need to review any made RNP after five years the land at Dunsells Lane should not be included as part of a proposed coalescence gap but should remain subject to countryside policies unless it is allocated for development.</p> <p>The land should be removed from the proposed coalescence gap.</p>
Policy RNP2: Settlement Policy Boundaries	<p>RNP2 Map 4 – Village Centre</p> <p>Objection is made to the settlement policy boundary shown on the map.</p> <p>Representations: The settlement boundary shown on map 4 should be re-drawn to include land at Dunsells Lane within the settlement boundary and its allocation for residential development. The land in question is edged red on the plan over the page.</p>



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The justification for this is the Government's policy that the supply of land for housing should be significantly boosted and that this is land that has no infrastructure or environmental constraints and is immediately available for development.

Moreover, the site has no key vistas and is not visually prominent (RNP3: Map 1 and maps on pages 34 and 40) and it is not land that is an area of significant visual prominence (RNP3: Map 2). Its development with a modest number of houses can be accommodated in accordance with all other policies of the RNP and would provide a solution to current issues being faced with foul and surface water drainage at adjacent properties.

<p>Policy RNP6: Sunken Lanes</p>	<p>Objection is made in principle to the policy</p> <p>Representations: As worded the policy is unduly restrictive by, in effect, saying a new access to a sunken lane will not be permitted. Vehicular accesses to unclassified roads are capable of being constructed as permitted development and therefore the policy is flawed for uncertainty in that it seeks to prohibit all vehicular accesses to sunken lanes when in practice it will not be able to prevent the exercise of permitted development accesses.</p>
<p>Policy RNP18: Amount of new housing</p>	<p>Objection to amount of new housing</p> <p>Representations: The RNP has been progressed under the aegis of the adopted East Hampshire District Joint Core Strategy, hence why its plan period is to 2028. On the face of it that seems a reasonable approach to take but District Local Plan policy is in the process of being reviewed and changed which casts grave doubt about whether the RNP should be proceeded with at this time.</p> <p>The RNP should not be progressed until the outcome of three key planning policy matters have been settled because they, individually and cumulatively, could have a major impact on the approach being taken in the RNP. The issues are:</p> <ul style="list-style-type: none"> • The review of the East Hampshire District Joint Core Strategy (JCS) has been completed a new Local Plan to 2036 is about to start its Regulation 18 consultation. That includes additional housing at Ropley which the RNP is silent about. • The Government review of the assessment of a district's housing requirement that has still not been settled. • The lack of clarity in the South Downs National Park Local Plan about how its planned shortfall in meeting its housing requirement is to be dealt with and how it adjacent MPs and district Local Plans might or will pick up the shortfall which is in the region of 3,750 homes <p>The outcome of all three could have a profound outcome for RNP and could generate a requirement to reconsider the approach in policy RNP18. For these reasons the RNP should not be progressed until those issues have been settled.</p> <p>In the event that the Examiner takes the view the plan can be examined the following representations are submitted.</p> <p>Every effort should be made to boost the supply of land for housing for all forms and tenures. This is a key plank of Government Strategy. The provision of only 27 additional homes (above the number already committed) is too few for a settlement the size of Ropley. The RNP should make provision for more housing (as indeed is the case in the emerging East Hampshire District Local Plan 2017 – 2036) and embrace paragraph 68 of the Framework. With that imperative in mind land at Dunsells Lane should be allocated as a potential development site for the following reasons:</p>

The site is immediately available but could be phased for development later in the Plan period

The site currently adjoins a settlement policy boundary to the north and south (Ropley Neighbourhood Plan) and lies close to the centre of the village. Development on the north west corner of the junction of Dunsell's Lane with Gascoigne Lane is also within a settlement policy boundary. The site is currently within the countryside but other than the constraint of planning policy there are no on-site environmental obstacles to its development.

Thus there are no known environmental constraints which would prevent the development of the site. There are no infrastructure obstacles either. The site has a substantial treed road frontage to Dunsells Lane within which is a field entrance that could be altered and improved to provide vehicular access. There is a treed boundary with the open fields to the east.

The site has a close affinity with the built form of this part of the village which has a recreation ground, village hall, primary school, village shop and post office and a church very close by and within easy walking and cycling distance.

The site could accommodate a modest housing scheme of 24 -30 dwellings at a density ranging from 12 – 15 dph in order to safeguard trees and hedgerows and avoid crowding development on the boundaries. A range of dwelling types and sizes could be accommodated. The site could accommodate a range of dwelling tenures including affordable, starter, market price and self-build homes and could also include live work units.

The land owner is well aware that the most recent housing developments permitted and constructed in East Hampshire are being undertaken by national housebuilders. Very few opportunities exist for small and medium sized house builders in the locality. As a result, small and medium sized developers are under-represented in this part of the district as they find it increasingly difficult to source development sites. This is exacerbated by the reliance on large sites to deliver the housing requirement of Local Plans. Government is very keen that Local Plans should include provision for small and medium-sized house builders. The opportunity exists with the Dunsells Lane land to allocate the site for development by small and medium house builders.

The aim is for development to sit within a landscaped framework that takes as its frame the treed boundaries and adjacent built form so that the development would sit within a landscaped greenspace around the development area. All boundary trees and hedgerows (except where removed for vehicular access) would be incorporated in the landscape scheme consistent with the overall aim of locating development within a strong landscape framework. All landscaped and greenspace areas would incorporate measures to enhance local biodiversity.

Finally, the landowner is aware that the adjacent housing to the south and east is experiencing problems with surface water and foul drainage. Approaches have been made to him to accommodate drainage and

	<p>sewage proposals arising from the adjacent houses on his land. The scale of those works has yet to be settled but they could be accommodated within this site and a comprehensive approach taken to resolve those issues where economies of scale and thus the cost to the adjacent property owners could be reduced.</p>
--	--

Ropley Neighbourhood Plan

Tue 15/01, 11:55

EHDC - Neighbourhood Plans Shared

Reply

Inbox (EHDC - Neighbourhood Plans Shared)

Ropley Neighbourhood ...

306 KB

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Hi,

I attach objections and representations to the Ropley Neighbourhood Plan.

Please note that there is an objection on the grounds that the RNP is legally non-compliant and unsound and it may be a good idea to review that asap in case you have to cancel the current consultation.

Best regards

[REDACTED] BA MRTPI

Associate Director

Southern Planning Practice Ltd

Registered Office: [REDACTED]

Registered in England and Wales No. 3862030

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Ropley Neighbourhood Plan

Regulation 15 Submission consultation representations

Your name	██████████
About you	Planning consultant representing a land owner
Representing	██████████
Company	Southern Planning Practice
Your address	██████████ ██████████ ██████████ ██████████ ██████████ ██████████
Email address	██
Introduction	The following abbreviations have been used in these representations on the Ropley Neighbourhood Plan: EHDC - East Hampshire District Council Framework - National Planning Policy Framework JCS - East Hampshire Joint Core Strategy aka Local Plan 1 LGS - local green space RNP - Ropley Neighbourhood Plan SDNP - South Downs National Park
Legal Compliance and soundness	<p>1. Objection is made that the RNP is legally non-compliant and therefore unsound.</p> <p>Representations: The RNP should have been prepared in accordance with the National Planning Policy Framework July 2018. Unfortunately, it has been prepared on the basis of the superseded Framework dated March 2012. Paragraph 214 of the current Framework makes it clear that the policies of the previous Framework will only apply to Plans submitted before 24 January 2019. The current RNP is at consultation stage and will not be a submitted plan on that date. It is, therefore, not legally compliant and as a result unsound.</p> <p>2. The RNP is unsound in that it does not consider the employment needs of the village and fails to have regard to the principles of sustainable development in the national Planning Policy Framework</p>

	<p>Representations: No explanation is given in the plan as to why the employment needs and the economy of the village has been ignored. A glaring example of this is that the Vision for Ropley is silent on business.</p>
<p>New employment policy</p>	<p>Petersfield Road, Ropley</p> <p>Objection is made to there being no employment policy in the RNP and the failure to make provision for new business development. The opportunity to address that deficiency exists at Home Far, Petersfield Road.</p> <p>Representations: The RNP fails to embrace the principles of the National Planning Policy Framework for achieving sustainable development and, in particular, it has no regard to paragraphs 6 a) and 6b) of the Framework to embrace:</p> <ul style="list-style-type: none"> a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; b) b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being. <p>The failure to address any economic needs in the parish or to look at how additional employment development could meet the social objective of a strong and vibrant community could be resolved through the allocation of land at Home Farm, Petersfield Road for employment use. The land owner would be very pleased to work with the RNP group to achieve an employment development that would be of benefit to local residents in providing local employment opportunities.</p> <p>A site of approximately 2.1ha lies within the village of Ropley that could be allocated for employment use – see plan over the page. The RNP proposes allocating land across the Petersfield Road frontage, in front of the site, for self-build housing. Adjoining the proposed allocation site are established business development sites at Home Farm and Sylcombe Farm.</p> <p>Outside the main urban centres of East Hampshire district (and the nearby South Downs National Park) the opportunities for new business development at villages are very limited. The conversion of farm buildings to business use can, through the strictures of the existing building form, be an obstacle to business occupiers and their needs. Allocating land at Home Farm would enable the construction of new business units to modern space standards and requirements and provide purpose-built units for occupiers. The addition of new commercial units at Ropley would provide local job opportunities and assist in reducing the need for those local people who could work at the site to travel to other centres of employment by car. Local employment would therefore be a sustainable form of development.</p>



Promap
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The land is currently used for grazing and there is a prominent group of three Oak trees within the field and a treed hedgerow on the western boundary. The land gently rises up from Petersfield to its southern boundary and the trees that sit on the skyline. An overhead line crosses the north eastern corner of the land. The trees and hedgerows contribute to the character of the area. The site is within the countryside but other than the constraint of planning policy there are no on-site environmental or infrastructure obstacles to its development.

The trees within and on the boundaries of the site can all be retained and their root protection zones safeguarded through an appropriate site layout.

The Home Farm site call for sites proposal is for the development of the site for business purposes with a mix of B1 and B8 uses (business use and storage). A development of some 4,000 - 5,250m² floor area is envisaged with appropriate car parking provision for B1 and B8 uses.

Ropley Neighbourhood Plan reg 15 Consultation

Thu 17/01, 12:27

EHDC - Neighbourhood Plans Shared

Reply

Inbox (EHDC - Neighbourhood Plans Shared)

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Section 3 Meeting the Basic Conditions (paragraph 8(2)) of the Basic Conditions Statement says:

The Examiner will consider whether it is appropriate to make the Plan, regarding to national policies and advice. National planning policy is set out in the National Planning Policy Framework (NPPF), published in March 2012 and advice is provided in the online Planning Practice Guidance (PPG) published in March 2014 and updated from time to time. The Government issued a revised NPPF on 24th July 2018. However, under the provisions of Paragraph 214 of the new Framework the plan will be examined against the provisions of the 2012 version so long as the plan is submitted under Regulation 15 by or on 24th January 2019.

Unfortunately this is not correct. The 2012 National Planning Policy Framework continued to apply for those Development Plans (in this case Neighbourhood Plans) that had already been submitted for Examination and were submitted before 24 January 2019. The Ropley Neighbourhood Plan is not a submitted Neighbourhood Plan and the Pre-submission Plan should have been prepared with due regard to the July 2018 Framework. The Plan is therefore proceeding in a legally non-compliant manner.

Best regards

[REDACTED] BA MRTPI

Associate Director

Southern Planning Practice Ltd

Registered Office: [REDACTED]

Registered in England and Wales No. 3862030

tel. [REDACTED]

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[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

By email.

18 January 2019

Dear East Hampshire District Council

Ropley Neighbourhood Plan

Land South of Church Cottages, Site 17 in Site Assessment Report

Thank you for the opportunity to submit a representation relating to the Ropley Neighbourhood Plan. [REDACTED] Ropley (site 17 in the Site Assessment Report), my representation is that the Ropley Neighbourhood Plan has an essential procedural error which requires the process to be repeated.

Site 17 was incorrectly scored in the Assessment Report, and incorrectly 'redlined'. The site actually scores joint highest in the report, does not breach any policies, and should have been considered as a Preferred site. Our representation to the Ropley Neighbourhood Plan on 18 March 2018 received no response, and the procedural error remains uncorrected.

I ask therefore that the Examiner reject the plan and that the exercise is re-opened, to allow consideration of this site based on accurate and fair assessment. We believe the Plan will be open to legal challenge if this error is not corrected.

I attach, below, the detailed response we previously submitted.

Yours sincerely

[REDACTED]

[REDACTED]

[Redacted]

By email.

26 March 2018

Dear Ropley Neighbourhood Plan Consultation

Land South of Church Cottages, Site 17 in Site Assessment Report

Background

Thank you for the opportunity to respond to a very professional and well managed consultation exercise. [Redacted]

We are in favour of most of the policies in the Consultation, but oppose the proposed allocation of sites. We believe that there has been a procedural error, would ask that you include our site, which is an infill site between existing properties, in your final plan submitted to EHDC.

AECOM Assessment Exercise and Policies

We recognise that the prioritisation of the housing sites in the Plan are determined by the independent AECOM assessment exercise, to the criteria and policies set by the Parish Council. We believe that there are several erroneous points in that exercise:

Assessment Criteria

Under criteria viii, Site 17 has been scored 1 rather than 2. This suggests that the site is 800m-1600m from the bus stop at the Village Hall. This is not correct – the distance is around 400m. So, this score should be 2, taking the overall score for the site to 28.

This score is joint highest in the Assessment Report, equal to the preferred Hale Close site and significantly higher than the other preferred sites.

RNP 5 – Distance from Two-lane road

The site has been ‘redlined’ in the Assessment Report, “due to its failure to comply with NP policy 5.1”.

RNP 5 is “A new development of more than five dwellings will not be permitted if the site access would be from a road of single-vehicle width, unless it is within 250 metres of a two-vehicle width road.”

Site 17 should not be ‘redlined’ against this policy. The distance to Church Street from the site’s access gate is 125m. On this basis, it is not procedurally correct to redline Site 17 as a consequence of RNP 5, and development of over 5 units is within policy.

RNP 6 – Sunken Lane policy

It is possible that reference to “NP policy 5.1” in the Assessment Report is a numbering error, and the report intends to reference RNP 6. This policy states: “Development which would involve the creation of a new access onto a sunken lane will not be permitted.”

Again, the site should not be ‘redlined’ against this policy. The site has an existing access on to Church Lane. Development would not therefore involve the creation of a new access. Site 17 does not breach RNP 6.

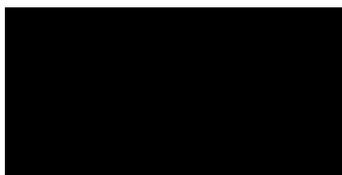
Designation of Site 17 as ‘Preferred’

These procedural errors in the Assessment Report exercise have led to an otherwise highest scored site being excluded from the Neighbourhood Plan. The redlining of Site 17 is incorrect under the methodology of the exercise, and should be corrected.

We respect the professional and transparent nature of the process for determining the Neighbourhood Plan. We can only conclude that the exclusion of Site 17 is a procedural error rather than there being any bias or lack of transparency in the process. We do not wish to delay the Plan, but if this error is not corrected we will raise this at the next stage with EHDC.

We would request that the Neighbourhood Plan therefore includes Site 17 as a preferred site on the basis that it is joint highest scoring of all the sites assessed and is fully compliant with all the Plan’s stated policies.

Yours sincerely

A large black rectangular redaction box covering the signature area.A smaller black rectangular redaction box covering contact information.

Enquiries to: Planning Policy
Direct line: 01730 234102
Email: localplan@easthants.gov.uk
My reference: RNP16
Your reference:
Date: 17th January 2019

For the attention of the Neighbourhood Plan Steering Group

Ropley Neighbourhood Plan: Regulation 16 Submission Version

We commend the Neighbourhood Plan Steering Group for producing a comprehensive Neighbourhood Plan. We acknowledge that the Neighbourhood Plan has been prepared in general conformity with the adopted Joint Core Strategy and submitted under the provisions of the NPPF 2012.

We would like to highlight a couple of factors which could have implications for the Neighbourhood Plan in the near future. These are:

- the Council in its role as Planning Authority for those parts of the district outside of the South Downs National Park is undertaking a Local Plan review and the draft Local Plan will be out for consultation on 5 February for 6 weeks; and
- the Government also issued a revised NPPF on 24 July 2018

To future proof the Neighbourhood Plan in this changing planning policy climate, we reiterate our comments made in response to the Pre-submission Consultation Document dated 27 March 2018, that we consider the use of policy quotes from the current Local Plan documents should be kept to a minimum given that the District Council is currently undertaking a Local Plan Review. A number of Local Plan policies and supporting text are still repeated in this Neighbourhood Plan. This comment now also extends to quotes and references from the NPPF 2012. Direct quotes are not necessary in the Neighbourhood Plan and will only date its contents. We would therefore like the opportunity to streamline the supporting text to ensure that it is fit for purpose moving forward.

Comments on specific chapters are provided below.

1.0 Plan Summary

We acknowledge that the Neighbourhood Plan now refers to 'clusters of development' as recommended in our previous response to the Regulation 14 draft. This was to address that not all pockets of built form are recognised settlements with settlement policy boundaries. However, the reference to clusters in paragraph 1.003 appears to include those parts recognised as settlements with settlement policy boundaries which are therefore not countryside. This needs clarifying.

4.0 A Profile of Ropley

It would be helpful to reference all data sources used.

5.0 Planning Policy Context

Please add the following to paragraph 5.002, third bullet point (see bold):

- East Hampshire District Local Plan: Housing and Employment Allocations (**April 2016**)

We would also recommend that additional text is added to paragraph 5.004 as follows (see bold). This ensures that the role of the Neighbourhood Plan and adopted Development Plan is clearly set out:

*The Ropley Neighbourhood Plan must be in general conformity with the strategic policies of the **adopted Development Plan as required by the 2012 Neighbourhood Plan Regulations**. Once 'made' the*

6.0. Vision

We recommend a couple of typographical amendments to Paragraphs 6.003 and 6.004 as follows (see bold strike-through):

6.003landscape. Clusters of developments will continue to be separated from each other by areas

6.004Importance, will have been maintained and further enhanced². This vision is underpinned by the objectives.

7.0. Objectives and policies

The Objectives

We recommend a typographical amendment: a full stop should be added to the end of paragraph 7.001, sixth bullet point (page 18).

The Policies

We recommend a typographical amendment on Page 19, paragraph 7.002, as follows (see bold strike-through):

7.003 The policies are ~~i~~within boxes: the other text explains the context and the reasons for each policy.

RNP1: Settlement and Coalescence Gaps

While we support an amendment to the original policy title from 'Settlement Gaps', we are concerned that the new policy title 'Settlement and Coalescence Gaps' may cause some confusion. Gaps are perceived to be of importance locally, and their principle function is to separate individual settlements (and/or clusters of development), the identity of which would be lost by their coalescence. We would therefore recommend that the policy is renamed to 'Gaps between Settlements' because it is the principle of the gap to stop coalescence of a settlement. In light of the above, we recommend that the last sentence in paragraph 7.008 is amended as follows:

*7.008Ropley that has evolved consists of discrete clusters of development. Policy RNP1 will be used to separate both recognised settlements that have settlement policy boundaries and the clusters of development that lie in the countryside. **Settlement gaps will be used to separate recognized settlements while coalescence gaps will be used where needed to prevent the elimination of historic gaps between clusters.***

Reference to the defined Gaps in Policy RNP1 should be combined into one list consisting of individual areas and the policy wording amended to reflect the comment above of referring to "Gaps between settlements".

We note the Neighbourhood Plan contains criteria for designating Gaps (page 20), however, we are concerned that some areas do not meet the requirements of the methodology. For example, the

function of the proposed gaps in Areas 2 and 4, their function is unclear as there does not appear to be any settlements that are at risk of coalescence. Also, the land furthest north (Area 5) is bounded by the A31 to the south and the railway to the north. The A31 acts as a barrier preventing encroachment and development is unlikely to cause coalescence with neighbouring Four Marks.

We wish to highlight that any gap boundary should include no more land than is necessary to prevent coalescence, which we do not consider to be the case for several of the proposed areas contained within the Neighbourhood Plan.

RNP2: Settlement Policy Boundaries

We recommend a typographical amendment as follows (see bold):

'Six Settlement Policy Boundary areas are designated within Ropley Parish:

*Ropley ~~Dene~~ **Dean** SPB*'

RNP4: Trees, Hedgerows, Verges and Banks

Policy RNP4, second paragraph, states that *'verges and banks should not be modified to accommodate parked vehicles unless it can be shown that it would not have an adverse effect on the visual appearance of the bank or verge.'* This could be difficult to enforce and may not necessarily require planning permission. We therefore recommend that this paragraph be deleted from policy RNP4.

RNP8: Local Green Spaces

Amendments should be made to paragraph 7.028 following the updated NPPF 2018. We suggest the following (see bold):

*7.028 The National Planning Policy Framework (~~paragraphs 76-77~~) empowers **communities through neighbourhood plans to designate identify and protect green** areas of particular local importance as Local Green Spaces. It states*

There are a couple of typographical errors in policy RNP8: Local Green Spaces:

Page 36, paragraph 7.028, second bullet point (see bold)

- *Is demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; **and***
- *Is local in character*

Page 39, Policy RNP8, third paragraph requires a colon at the end and paragraphs four and five require full stops at the end of their paragraphs.

RNP9: Built Heritage

To future proof the NP we suggest the removal of the first paragraph that starts *'Policy CP30'* where it repeats the Local Plan policy.

RNP10: Nature Conservation

To future proof the NP we suggest the removal of reference to *'Policy CP21'* in paragraph 7.043 where it repeats the Local Plan policy.

As stated in our previous response, whilst we are supportive of your intent for securing local nature conservation networks, we consider the policy should be re-worded to take a more positive stance (to reflect the hierarchy of designations set out by the NPPF).

RNP11: Rights of Way

Pages 47 to 48, the supporting text within this section does not always relate to the heading, for example, the first paragraph relates to public transport provision and the third relates to car ownership levels which does not directly relate to policy RNP11.

Paragraph 7.052 refers to the NPPF 2012 (paragraph 30) and it's supporting text. We recommend this is amended to be more generic to future proof the NP.

Paragraph 7.051 references Policy CP31, we recommend such references are removed to future proof the NP.

RPN13: Design and Height of New Housing

We question why the policy introduces a restrictive policy that does not permit dwellings of more than two storeys or no more than two dwellings are to be identical. There appears to be no evidence provided to justify such a prescriptive approach.

RNP17: Ensuring Appropriate Design and Materials

Page 55 – To future proof the NP we suggest removing the direct quotes of the Joint Core Strategy policies and supporting text.

We consider Policy RNP17 is too restrictive for new housing developments. For example, street lighting should not be restricted if it is deemed necessary for safety. Rather than resisting all forms of street lighting, there are alternatives such as down lights that can minimise light spillage.

RNP18: Amount of New Housing

We continue to welcome the proactive approach towards the provision of housing to meet local needs.

RNP21: Proposed Housing Site on Petersfield Road

We support the allocation of a site for self and custom build dwellings which is in conformity with criteria c) of Joint Core Strategy Policy CP11 (Housing Tenure, Type and Mix). However, we wish to highlight that a rural exception site is for affordable housing, which does not appear to be the intention of this policy. We would therefore suggest that the first sentence of the policy wording is amended to clarify the intent of the policy. Some potential wording is provided below:

*Land between Homeview and Wykeham House on Petersfield Road is allocated ~~as a rural exception site for residential development~~ **for the provision** of four self-build dwellings on 0.25 hectares as shown on the Proposals Map.*

Yours sincerely

The Planning Policy Team

Comments on Ropley Neighbourhood Plan

1. I'm generally supportive of the plan as a whole.
2. I'm unhappy with and object to the final sentence of Policy RPN2 namely, "The development of residential garden land within any SPB will be refused, unless it can be demonstrated that such development would not harm the local character of the area." In particular I'm opposed to redrawing the Settle Policy Boundary (SPB) to remove significant areas of back garden land as indicated in RPN2 MAP2 –Winchester Road reproduced below.



RNP2: MAP 2 - WINCHESTER ROAD

I'm against this as the nature of planning and the housing shortage experienced at a local and national level means that there will always be pressure for more housing development over and above that identified in the plan. I feel it is much better to allow development close to a main road and bus service to prevent additional traffic along narrow and sunken lanes. (I'm assuming here that most people will need to work outside the village and will get to their work by car.) Opening such back garden land to potential development means that fewer sites involving rural/agricultural land would need to be used if extra housing were needed in the future. Please can this SPB not be redrawn to exclude back garden land.

I made this objection plain when invited to comment at the parish level (Policy RNP2, Comment 20). Similar comments were made by 2 other parish residents (Comments 26 & 27) but I believe the concerns raised were not adequately answered.

██████████ (email: ██████████ tel: ██████████)



Neighbourhood Plan - Ropley

MG

Thu 24/01, 16:00

EHDC - Neighbourhood Plans Shared  Reply | 

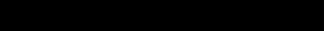
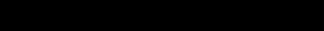
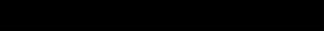
Inbox (EHDC - Neighbourhood Plans Shared)

I object to the sentence in policy RPN2 “the development of residential garden land within any SPB will be refused, unless it can be demonstrated that such development would not harm the local character of the area”.

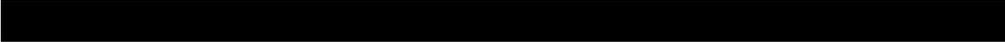
I do not see how redrawing the SPB to include removal of significant areas of back gardens as per RPN2 Map2 (Winchester Road) will help the provision of land for the development of much needed low cost housing for the local area and will increase pressure to build on green field areas. Development of these area (Back Gardens on the A31) have the advantage of being close to the main road and bus routes thus alleviating pressure on local narrow country lanes/roads.

Can the SPB be redrawn to exclude the back garden land and thus give future developments so that the current planning application rules continue to apply and not make it more difficult for additional housing to be provided in the future.

Best Regards


Phone 
Mobile 
Email: 

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Consultation Comments on behalf of Interested Party: [REDACTED]

CW

[REDACTED]
Fri 25/01, 09:55

Reply | v

EHDC - Neighbourhood Plans Shared v

Inbox (EHDC - Neighbourhood Plans Shared)

This message was sent with high importance.

Dear Sirs

Re: EHDC Public Consultation - Consultation Comments on behalf of Interested Party, Miss I Tillen

In line with the Regs 14 Phase of consultation I provide the following comments on behalf of my client, for whom we submitted representations in relation to the site known as "The Ramblers". These comments are consistent with those raised in consultation on 20th March 2018, and, given the lack of consideration of them to date, I would request that proper consideration is given to them at this juncture and for this to be acknowledged.

I have again reviewed the updated draft Neighbourhood Plan in full and predominantly concentrate my comments on the approach that has been taken to calculating housing needs, the consideration of self and/or custom built plots and contribution that the Ramblers site can make to the Plan that has still not been considered by the Steering Group to date.

With the regard to the general approach that has been taken to the development of the draft plan and the overarching principles of the policy brought forward I maintain making no specific comments. With regards to the suitability of the proposed allocation sites for development, I continue to make no comment in particular other than the proposed allocation of such plots is in my opinion an under delivery of the requirement for the area. My comments again continue to focus on the Housing Needs Assessment and the subsequent justifications that continue to be taken forward from them by the NP Steering Group, from which there has been no identified movement for a significant period of time, despite a requirement to respect and reflect on fluctuations in market requirements and planning policy in the meantime. The approach reads as if a position was set, sites were chosen to reflect the position, and justification to avoid a departure from the position has been concentrated on since. This, therefore is not reflective of this point in time, but instead of 2 years ago. As a most basic requirement, sufficient consideration of the updated NPPF of 2018 should be made, and is currently insufficient. With the points identified above in mind I do consider that the proposed site brought forward by my client at The Ramblers continues to offers both a proportionate contribution to housing supply and the opportunity to contribute to the characteristics required for self/custom build development in a manner that offers limited harm in Development Plan policy terms; harm which in our opinion is outweighed by the planning balance associated with the provision of self/custom built homes in a locality that supports it. The sites inclusion, in an NP more reflective of 2019, is considered an appropriate revision at this stage.

Regards

[REDACTED] MRICS BSc (Hons) RICS Accredited Expert Witness

Managing Director / Chartered Planning & Development Surveyor

Resident Grand Designs Expert: [Grand Designs Live](#)The latest edition of my book can be purchased from Amazon here: [Understanding Planning](#)

Reply |  Delete Junk |  ...



HEAD OFFICE: [REDACTED]

LONDON: [REDACTED]

MANCHESTER: [REDACTED]

Email: [REDACTED]

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Planning Policy
East Hampshire District Council
Penns Place
Petersfield
Hampshire, GU31 4EX

Our ref: HD/P5236/01

Your ref:

Telephone

Fax

25th January 2019

Dear Sir or Madam,

Ropley Neighbourhood Plan Submission

Thank you for your e-mail of 14th December 2018 advising Historic England of the Regulation 16 consultation on the Ropley Neighbourhood Plan. We are pleased to make the following comments in line with our remit as the Government's adviser on the historic environment.

We welcome the description of the historical development of Ropley, albeit rather brief, in paragraphs 4.002 – 4.004.

We welcome the reference to character in the Vision and in Objective 4, but has there been a character assessment of the parish? Historic England considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan.

Characterisation studies can also help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change. The appendix to this letter contains links to characterisation toolkits, and we would be pleased to advise further on this subject.

We are disappointed that there is no reference to the historic environment or heritage assets in the Vision e.g. "*The heritage assets of the parish will be conserved, enhanced, understood and valued*".

However, we are somewhat mollified by the sixth objective and are pleased to note that it has been amended as we suggested when commenting on the Draft Plan.

We welcome the designation of the land behind Vicarage Lane and between the Recreation Ground and Ropley House, the land west of School Lane/Church Lane and the village pond as Local Green Spaces in Policy RNP8 given their contributions to the history, setting and character of the village and listed buildings.



Historic England, [REDACTED]

Telephone [REDACTED] HistoricEngland.org.uk

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We welcome paragraphs 7.039 – 7.042. However, the National Heritage List for England (the only official, up to date, register of all nationally protected historic buildings and sites in England) has 41 listed building entries within the parish (two Grade II* and 39 Grade II, as noted in the Strategic Environmental Assessment).

We consider that it would be helpful to say that the conservation areas were designated in 1976, that (we understand) that there has not been any review of the designations, what their special interest (the reason for designation) is and the fact that there is only a Guidance Leaflet for the Areas, not character appraisals and/or management plans.

We note that Section 8.0 of the Plan on implementation and monitoring states “*The Parish Council notes that Historic England had been unhappy that the Conservation Area documentation for Ropley has not been re-assessed since 1976 and therefore strongly recommends that East Hampshire District Council prioritises a re-assessment of Ropley’s Conservation areas. The Parish Council also commits to support preparation of a Conservation Area Appraisal Plan for the Ropley Conservation Area*”.

Whilst we welcome the Parish Council’s support for a reassessment of the Conservation Areas and the preparation of character appraisals and management plans, we would have preferred these to have been prepared as part of the evidence base for the Plan. These initiatives could also be undertaken by the local community (as, for example, is currently happening, with our support, in Winchester and Ramsgate). The appendix to this letter contains a link to the Oxford Toolkit, which is one appraisal methodology that could be used. We would be pleased to advise further.

We note the Parish Council’s call for extending the boundaries of the conservation areas. The District Council of course needs to bear in mind the advice in paragraph 127 of the National Planning Policy Framework (2012), but a character appraisal of the villages or of the conservation areas would help make the case for an extension of the conservation area boundaries.

We welcome Policy RP9 and the identification of locally important heritage assets in as such non-designated assets can make an important contribution to creating a sense of place and local identity. However, whilst we welcome the amendment to the policy that we suggested - that the list of assets be set out in an appendix to the Plan the policy has not been reworded to also apply to any non-designated assets which might be identified in the future. We therefore suggest that Policy RP9 be reworded as;

“A number of assets have been identified as locally important heritage assets and are shown on the Proposals Map, and listed in Appendix 3. However, other assets may be identified as being of local importance during the life of the Plan and this policy will apply to any such assets so identified at the time of determination of a planning application that would affect the significance of a locally important heritage asset.



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Development proposals must retain the significance of any locally important heritage assets, including their contribution to local distinctiveness. Proposals for demolition or alterations to the asset or development within its setting will be assessed as to the extent of the harm to the significance of the asset.”

We are not clear why the features listed at the top of page 33 are considered not to be eligible to be protected under Policy RNP9 – as drafted the Policy does not include them, but we see no reason why they could not be included. The National Planning Policy Framework defines a heritage asset as “*A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest*”, which could include milestones, telephone boxes and signposts – there are certainly listed milestones and telephone boxes. (“Heritage interest” may be archaeological, architectural, artistic or historic).

We note that there is no reference within the Neighbourhood Plan to archaeology or historic landscapes. Have the Hampshire Historic Environment Record and Hampshire Historic Landscape Character Assessment been consulted, the former for non-scheduled archaeological sites, some of which may be of national importance ?

Although there are no scheduled monuments within the parish, the National Planning Practice Guidance states “... *where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions*”.

Although none of the heritage assets in the parish are currently on the Historic England Heritage at Risk Register the Register does not include Grade II listed secular buildings outside London. Has a survey of the condition of Grade II buildings in the Plan area been undertaken ? (If not, we can provide advice on undertaking such a survey). Has there been any or is there any ongoing loss of character through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc ?

We welcome, in principle, Policies RNP12 – RNP16. Paragraph 58 of the National Planning Policy Framework (2012) states “...*neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics.*”

We consider that these policies, taken together, are “*robust and comprehensive*”, and that the Village Design Statement provides the required “*understanding and evaluation of [the area’s] defining characteristics*”.

As noted in the supporting text to Policy RNP19, the proposed housing site off Hale Close is close to the historic churchyard and Church Street Conservation Area. We therefore welcome and support the requirement in Policy RNP19 that development will



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“have a design, layout and landscaping of high quality and character which respects the characteristics of the village, and avoids any harm to the Church Street Conservation Area and its setting”.

We are concerned that the Site Assessment Criteria set out in Appendix 2 do not include any relating to heritage assets, including archaeology, However, as regards Policies RNP20 and RNP21, allocating the land at junction of Winchester Road and Gascoigne Lane on the site of the former Chequers Inn public house and land between Homeview and Wykeham House on Petersfield Road, according to our records, there are no designated heritage assets on or near these sites.

However, the Hampshire Historic Environment Record should be consulted for any archaeological finds records and, if need be, the Hampshire County Archaeologist should be consulted. If that has not been done, and the lack of reference to the Hampshire HER in the Plan (including Appendix 5) or in the SEA Environmental Report, or to archaeology in the Site Assessment Criteria, would suggest that it has not, then we cannot be confident that the development of any of these sites would be acceptable in respect of archaeology (although we do accept that, as previously-developed land, land at junction of Winchester Road and Gascoigne Lane on the site of the former Chequers Inn public house and land between Homeview and Wykeham House on Petersfield Road are less likely to have buried archaeological remains).

In the Glossary of terms, “heritage asset” has become mixed up with “Evidence Base”.

We hope you find these comments helpful. Should you wish to discuss any points within this letter please do not hesitate to contact us.

Thank you again for consulting Historic England.

Yours faithfully,

[Redacted signature]

[Redacted name]
Principal Adviser, Historic Environment Planning
(Bucks, Oxon, Berks, Hampshire, IoW, South Downs National Park and Chichester)

E-mail: [Redacted email address]



Historic England, [Redacted address]

Telephone [Redacted phone number] HistoricEngland.org.uk

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Appendix: Sources of Information

The National Heritage List for England: a full list with descriptions of England's listed buildings: <http://list.historicengland.org.uk>

Heritage Gateway: includes local records of historic buildings and features www.heritagegateway.org.uk

Heritage Counts: facts and figures on the historic environment <http://hc.historicengland.org.uk>

<http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/> has information on neighbourhood planning and the historic environment .

HELM (Historic Environment Local Management) provides accessible information, training and guidance to decision makers whose actions affect the historic environment. www.helm.org.uk or www.helm.org.uk/communityplanning

Heritage at Risk programme provides a picture of the health of England's built heritage alongside advice on how best to save those sites most at risk of being lost forever. <http://risk.historicengland.org.uk/register.aspx>

Placecheck provides a method of taking the first steps in deciding how to improve an area. <http://www.placecheck.info/>

The Building in Context Toolkit grew out of the publication 'Building in Context' published by EH and CABE in 2001. The purpose of the publication is to stimulate a high standard of design when development takes place in historically sensitive contexts. The founding principle is that all successful design solutions depend on allowing time for a thorough site analysis and character appraisal of context. <http://building-in-context.org/toolkit.html>

Knowing Your Place deals with the incorporation of local heritage within plans that rural communities are producing, <http://www.historicengland.org.uk/publications/knowning-your-place/>

Planning for the Environment at the Neighbourhood Level produced jointly by English Heritage, Natural England, the Environment Agency and the Forestry Commission gives ideas on how to improve the local environment and sources of information. <http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf>

Good Practice Guide for Local Heritage Listing produced by Historic England, uses good practice to support the creation and management of local heritage lists. <http://www.historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/>

Understanding Place series describes current approaches to and applications of historic characterisation in planning together with a series of case studies <http://www.helm.org.uk/server/show/nav.19604>

Oxford Character Assessment Toolkit can be used to record the features that give a settlement or part of a settlement its sense of place <http://www.oxford.gov.uk/PageRender/decP/CharacterAppraisalToolkit.htm>



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Ropley Neighbourhood Plan comments

JB

Fri 25/01, 12:35

EHDC - Neighbourhood Plans Shared

Reply | v

Inbox (EHDC - Neighbourhood Plans Shared)

Dear sir or madam,

I am writing to comment on the [Ropley Neighbourhood Plan regulation 16 submission documents](#).

I am a landowner in the village of Ropley and previously submitted comments in March 2018 as part of the consultation process. The majority of those concerns or criticisms, which are echoed by others, have not been adequately addressed.

My main grievances with the revised submission are as follows:

LGS5

Throughout the assessment process this field was never identified as an important local green space site due to the fact that it doesn't fulfil the criteria set out in the NPPF. This is farmland that is virtually hidden except from private land, being flanked along Hammonds Lane by hedgerows. It does not hold a particular local or historical significance, its ecological richness and importance has been hugely overstated, and the fact that sheep are regularly driven through the centre of the village to reach the field is a something that frustrates many residents. The allocation of LGS5 has been contrived due to pressure on the steering group from certain neighbours (as documented in their minutes) rather than due to genuine planning concerns or policy.

The field's proximity to a conservation area is not grounds to allocate it as a LGS - the preferred site at Hale Close for example is adjacent to a conservation area. St Swithuns Way passes through many other fields that are far more visible and visually appealing but are not allocated as local green space. The field is only visible from the road through one small gap in the hedgerow, so it can't be said to leave a lasting impression. The wording of paragraph 7.037 implies it is visible from the Petersfield Road but this is not the case. Please also note that neither image on page 38 of the plan show the land in question.

If allocated LGS5 would occupy Site 34 which is one of the very highest scoring sites in the Neighbourhood Plan. Despite this, the site was never properly considered for development, and in fact was not even mentioned on the original site assessment criteria scoring summary page despite scoring 26 points, and in fact should have been tied for 1st place with 28 as it is absolutely wrong to assert that the land has high visual importance.

Site 14

Site 14 was incorrectly excluded from consideration in the site assessment criteria scoring order. The error has since been corrected, which should have put the site among the very highest scoring in the Neighbourhood Plan, and above other locations allocated for housing. In response to our consultation comments, the steering group appear to have amended the error in the scoring matrix which erroneously identified the land as local green space, and admit that the site should not be considered 'backland'. However, the consultation response incorrectly suggests that the site is visible from the top of Vicarage Lane. This is not the case due to the slope of the hill, and as such is not in a key vista. It is wrong to assert that site 14 is of high visual importance as new buildings here would only be visible from one neighbouring property.

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highest scoring in the assessment, and with excellent access from the Peterstield Road, site 14 has never been properly considered. The revised plan does not address the site or its clear benefits, nor provide any valid grounds for its exclusion.

The favoured land off Hale Close meanwhile has many shortcomings that contradict numerous key policies of the Neighbourhood Plan itself. It creates a large incongruous housing development in an open and visually prominent field, which would be a finger of development out of keeping with the settlement boundary, adjacent to a conservation area, spoiling the views from the church and adding traffic to an already congested junction used by walkers and school children.

Yours faithfully,



FW: Publication of Consultation - Ropley Neighbourhood Plan Regulation 16

G

Fri 25/01, 12:35

EHDC - Neighbourhood Plans Shared

Reply | v

Ropley reg 16 (EHDC - Neighbourhood Plans Shared)

Good afternoon everyone

Thank you for inviting me to give feedback as part of the consultation about the Ropley Neighbourhood Plan (RNP).

I know enormous effort has been put in by volunteers to create the plan, over many years, and start by thanking my neighbours for their commitment and long hours put in to produce a very detailed plan.

My feedback is provided as an individual, without detailed knowledge of planning protocols, the wider planning landscape into which this plan fits, or the priorities that EHDC experts apply when considering conflicting policies, if they arise, for a given development. That said:

1. **Does Ropley demonstrate much appetite for a neighbourhood plan?** Despite commendable efforts to engage, inform and solicit inputs, village engagement with the plan seems weak. Less than 10% of Ropley responded to the village RNP consultation with responses from a narrow cross section of the community (half of responses from 3 streets, just 2 responses from 15 streets).
2. **The proposed developments within the RNP are less supported.** The RNP comprises (Group A) Policies 1-17 and 21-24 as guidelines to shape development that reflect local sensitivities and (Group B) Policies 18-20 that propose various sites to fulfil quotas for new housing. Group A policies were well supported in the village RNP consultation. Group B policies were less well supported, often because they seem expedient, contradicted the actual policies set out in Group A and/or were at odds with some feedback received during writing of the RNP.
3. **The submitted RNP has made almost no adjustments as a result of the village consultation.** Of c58 comments that raised issues with Policies 18, 19 and 20, "No change proposed" was the net response to 56 (97%) of them. Is that a listening process? No village meetings were held to review feedback or explain how the plan was adjusted (or not).
4. **The RNP has the effect of locking in current, expedient sites...while simultaneously blocking future, alternative development sites.** The RNP appears as a scheme to channel local development, designating sites to achieve mid term quotas, and (by hitting local targets) has the negative effect of thwarting potentially better future schemes. Healthy villages need good development...and more of it. RNP Group A Policies can help that process, Group B policies do not.
5. **There are specific concerns about development in the junction area adjacent to Ropley School that are 'screened out' by the RNP.** Creeping development in Hale Close has been enabled by highways approval that this junction can handle the additional traffic flows that result; each prior approval being used as precedence to justify the safety of the next scheme. This approach* is also used by RNP to justify policies within the plan. Perhaps a fresh assessment should be made to inform the RNP (given the safety and risks

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using Hale Close (itself a designated walkway from school/parish hall parking).

For all the local voice and engagement that Neighbourhood Plans are supposed to foster, the RNP feels light on that front. Perhaps we'd all be better off allowing professional planners to shape/develop housing in a strategic way (transport, jobs, infrastructure) rather than a well intentioned but somewhat flawed bottom up approach? That way, good schemes that emerge can be sensibly approved (while bad ones fail) on their merits.

I hope the wider RNP consultation raises points of interest for EHDC.

Kind regards



*This matter became a point of local debate about access roads in the rebuilding of St Peter's Church, Ropley. The proposed scheme generated over 120 comments from the public, both in support and against, many around use of the Hale Close access. Despite the very high number of comments in a small village context, this was not elevated to committee where perhaps the issues at stake could have been usefully reviewed.



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From: Collier, Hannah [mailto:Hannah.Collier@easthants.gov.uk]

Sent: 14 December 2018 15:42

Subject: Publication of Consultation - Ropley Neighbourhood Plan Regulation 16

Dear Sir/Madam,

NOTIFICATION OF PUBLICITY OF THE ROPLEY NEIGHBOURHOOD DEVELOPMENT PLAN UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012

I write to inform you, as a consultation body or consultee identified in Ropley Consultation Statement that we are now in receipt of the final submission version of the Ropley Neighbourhood Plan along with all accompanying documentation required under Regulation 15.

What documents comprise the 'plan proposal'?

The plan proposal comprises the following documents:

- (a) A map identifying the area to which the proposed neighbourhood development plan relates;
- (b) A consultation statement;
- (c) The proposed neighbourhood development plan;
- (d) A statement explaining how the proposed neighbourhood development plan meets the requirements of paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990

Where can the plan proposal be inspected?

Details of the plan proposal and downloadable copies of the relevant documents can be found on our website at: <http://www.easthants.gov.uk/neighbourhood-plans/emerging-neighbourhood-plans>

COMMENTS MADE BY MR & MRS R L WOOD ON THE SUBMITTED ROPLEY NEIGHBOURHOOD PLAN – JANUARY, 2019

POLICY RNP1 – SETTLEMENT AND COALESCENCE GAPS

We object to the policy – it is not needed. The current EHDC Joint Core Strategy (JCS) and Local Plan 2 (LP2) do not set a level of development which would cause any threat of Ropley & Four Marks being joined together, or of different parts of the village being joined together.

The gaps are intended as long-term designations. The extent of the proposed gaps is far too large and, in the future, will cause problems when new plans have to identify suitable sites for development to meet the needs of the village.

Area 5 – Settlement Gap between North Street and Four Marks

It is highly unlikely that the level of development required in Four Marks and Ropley in the forthcoming review of the JCS would create any danger of the 2 settlements being joined together. **Areas 5 (North Street to Four Marks) should be deleted.**

Area 6 – Settlement Gap between Ropley Village and Ropley Dean

We strongly object to the proposed settlement gap between Ropley and Ropley Dean. These two parts of Ropley are about half a mile distant from each other. There is no danger that they will coalesce.

The level of development being proposed in the Neighbourhood Plan and in the emerging review of the JCS will not result in these two parts of Ropley being joined together.

The land to the west of Berry Hill does not create a gap – it is two fields extending from the A31 to Hook Lane and Berry Hill. It does not achieve any separation of Ropley Village from Ropley Dean. Area 6 (Ropley – Ropley Dean) should be deleted from the Plan.

If Area 6 is to be retained in the Plan then **we strongly object** to the inclusion of our small field in the Settlement Gap boundary. The attached map A shows the extent of our field, which lies to the east of Applewood House and to the south of 2, The Dene.

Area 3 – Coalescence Gap between Ropley Village and Gilbert Street / North Street

We object to the extent of this proposed Coalescence Gap. There is no possibility under the Neighbourhood Plan or the emerging JCS that development would result in the coalescence of these different parts of the village.

The proposed Coalescence Area includes some areas of land close to the main part of the village which, in the future, might need to be considered for some limited amounts of development to help meet the needs of the village. Potential available sites have been identified in earlier SHLAAs and in the work carried out for the

Neighbourhood Plan, eg, land at Carpenters, Gilbert Street and land to the east of Dunsells Lane.

If this Coalescence Area is to be retained in the Plan, **the boundary of Area 3 should be reviewed** to allow for some longer-term development, especially at Carpenters and some of the land to the east of Dunsells Lane.

POLICY RNP2 – SETTLEMENT POLICY BOUNDARIES

We object to last paragraph of the Policy, which states that development on garden land will not be allowed unless it can be demonstrated that the development will not harm the character of the local area.

National planning policies expect new development to be located firstly within built up areas and then in areas allocated in Local and Neighbourhood Plans. The EHDLP JCS expects development to take place within settlement policy boundaries (SPBs).

The submitted Neighbourhood Plan appears to expect new housing to only take place on the sites which either already have planning permission or which are allocated for development in the Local Plan and the Neighbourhood Plan. Although mention is made of windfall sites in the text following Policy RNP18, the opportunities for development on such sites has been greatly reduced by the review of the settlement boundaries. The removal of some long back gardens from the existing SPBs reduces the opportunities for single plot and very small housing developments to take place within the existing built up areas of the village.

MAP 1

We support inclusion of the Colebrook Fields development and the rear gardens of the dwellings to the South of The Dene.

We object to the exclusion of Dene Cottage (the first bungalow up Bighton Hill beyond the Colebrook Field Development) from the settlement boundary. The development of Colebrook Field means that Dene Cottage is surrounded on two sides by development. It now clearly forms part of the development at The Dene.

We object to removal of the land to the West of Aurea Norma from the SPB. This provides scope for a small development site within the Ropley Dene SPB

MAP 2

We object to removal of the rear gardens of the houses fronting Winchester Road and Gascoigne Lane. These offer some limited opportunities for small scale residential development which, if designed appropriately, will not harm the character of Ropley.

MAP 3

We support the inclusion of the Stone Corner development on the eastern side of Dunsells Lane in the SPB.

We object to removal of the private land from the corner of Dunsells Lane and Gascoigne Lane. It should be included within the SPB.

We object to the removal of the narrow strip to the south of Meadow View from the SPB.

We object to the revised SPB cutting through the property known as Briarside on Gascoigne Lane. As shown in the Plan, the boundary runs through the house and does not include any of the back garden. The boundary of the SPB should be amended to include all of Briarside and at least 10 metres of the back garden.

MAP 4

We object to the exclusion of some of the houses in the northern part of Hale Close from the SPB. These homes form part of the built-up area of the centre of Ropley and should be included in the SPB.

Similarly, the new houses which have recently being built at the eastern side of Hale Close should also be included in the SPB.

POLICY RNP3 – VISTAS AND VISUAL PROMINENCE

a) Areas of Significant Visual Prominence (ASVP)

We support the overall purpose of the policy but have concerns about the policy wording. It **needs amending** to say:

*'Development will **not normally** be allowed unless it can be shown that it would have no **significant** adverse impact on ...'*

As currently worded, anyone objecting to a proposed development, however small, could argue that the development would have an adverse impact on the visual appearance or character of the landscape.

The second paragraph, dealing with **views to and from the National Park** also needs rewording. The map (RNP3 Map 2) does not indicate where these views are. They **should be shown on the map**.

We object to the extent of the areas of significant visual prominence shown on map RNP3 Map 2. They cover large areas of the parish, including the one site now being proposed for development in Ropley in the emerging East Hampshire Joint Core Strategy.

Taken together with policy RNP1, the settlement gaps, coalescence areas and areas of significant visual prominence will make it very hard to find suitable sites for new development in future plans for the village.

We object to the land on the S side of The Dene and west of Berry Hill being included in the ASVP.

We strongly object to the field at Applewood House on The Dene being included in the ASVP. It can hardly be seen from surrounding roads and is divided from the larger field by a mature hedgerow. It should be removed from the designation. Map A attached to our comments shows the precise area to be removed.

b) Key Vistas

It is not clear why only Key Vistas in the centre of the village are shown on Map 3A. Are these the only Key Vistas in the parish?

At the moment, they appear to be being used as a way of preventing development in the centre of the village. A balance needs to be struck between protecting vistas and allowing some development in the future which would also bring community benefits to the village.

The Plan, through the use of Settlement Gaps and ASVPs, is effectively preventing development along the A31 and many of the roads through the parish. If sites close to the centre of the village are also to be excluded, as Key Vistas, then where will future development in the parish take place?

We object to the field to the west of the Recreation Ground being included in a Key Vista designation. The owner has previously proposed that this land could be used as an extension to the recreation ground together with some housing. Provided the scale and design of the development is appropriate, the long-term option of extending the Recreation Ground should be retained.

POLICY RNP4 – TREES, HEDGEROWS, VERGES AND BANKS

We support the overall intention of the policy. However, it is not clear how the policy will be operated.

In the first paragraph it says that 'any new planting in association with the new development will be of indigenous species'. Is this all the planting within the development or just in the hedgerows, verges and banks? Some non-indigenous species may be appropriate within a development, especially in gardens and formal landscaped areas.

POLICY RNP5 – NARROW LANES

We support the overall objective of the policy to protect the narrow lanes in the village. However, its impact on future development needs to be taken into account when the boundaries of the Settlement Gaps, Coalescence Gaps and Areas of Significant Visual Prominence are drawn up.

The policy states that development along single width roads should be of no more than 5 dwellings. It therefore follows that developments of more than 5 houses should be located alongside double-width roads (ie, the A31 and the C18 Petersfield Road). However, the Settlement and Coalescence Gap and ASVP policies and designations effectively prevent development along much of the A31 and the C18, the two main double-width roads in the parish.

Further thought needs to be given as to where future development will take place in the parish if the most suitable areas, in highway terms, are excluded from development by other land designations.

POLICY RNP6 – SUNKEN LANES

We agree with the overall objective of the policy, to protect sunken lanes. However, **we object** to the blanket ban on new access points along sunken lanes. In some parts of the parish, a small new accessway could be constructed at the beginning / end of a sunken lane without harming the overall integrity of the sunken lane. We propose that the wording of the policy is amended to say 'will not normally be permitted'.

POLICY RNP8 – LOCAL GREEN SPACES

We agree that the Recreation Ground and the area around the pond form important green spaces.

LGS2

We object to the inclusion of the land to the west of the Recreation Ground (LGS2) being included as a Local Green Space. The footpaths across and around the field are statutory footpaths and should be able to be protected through the footpath legislation. There is no public access to the rest of the field.

The owner has previously proposed that an extension to the Recreation Ground could take place on part of this field, along with some housing development. Provided that the amount of development proposed, its design and its location are appropriate and the footpaths are retained, then this is an option which the parish may wish to consider in the future. It makes sense to expand the Recreation Ground in this location, should there be a need for more recreation space in the future.

LGS 3

We are not sure that the land to the west of School Lane / Church Lane is a Local Green Space. There are no rights of way across it and there is no public access to it. The use of the field on a few rare occasions for informal parking for village events is not enough to warrant its designation as a Local Green Space. This has only been able to take place through the kind permission of the owners in the past. There is no certainty that this use will be allowed in the future.

The site is shown as having Key Vistas from Church Street / School Lane (Map RNP Map 1) but it is not included as an area of Significant Visual Prominence. If the key reason for designating this area as a Local Green Space is because of the views out of the village, then the correct policy to use is the Key Vistas Policy (Policy RNP3).

POLICY RNP18 – AMOUNT OF NEW HOUSING

We support this policy. Paragraph 7.091 shows the continuing importance of windfall sites in providing homes in Ropley.

Our comments on RNP2 and the changes to the settlement policy boundaries show the need to continue to have enough land within the SPBs to enable windfall site development to take place.

POLICY RNP19 – LAND OFF HALE CLOSE

We support the amount, location & type of housing proposed for this site and the new road to the rear of the church and the proposed car park.

POLICY RNP20 – THE FORMER CHEQUERS INN SITE

We strongly support the redevelopment of this site, provided that the drainage problems on the corner of the site nearest to the Gascoigne Lane & A31 junction can be resolved and that the drains are cleaned out very regularly so there is no danger of water getting in to any of the homes.

We query why the site should be accessed only from Gascoigne Lane as there is already an existing access to the site from Winchester Road. There is only a very short stretch of road frontage available on Gascoigne Lane.

We support the proposed provision of a footpath from Gascoigne Lane to Winchester Road to give safe access to the bus stops.

POLICY RNP21 – LAND OFF PETERSFIELD ROAD

We strongly support this policy. It is a good site for self-build housing. Such sites may take time to get developed. It is right to review the policy after 5 years – but the site should not automatically be removed from the Plan if it hasn't been built by then as it may take prospective purchasers some time to put together the necessary finance for their project.

POLICY RNP22 – OCCUPANCY RESTRICTION

We support the use of the policy for the first occupiers of the self-build properties built on the allocated site at Petersfield Road.

POLICY RNP23 – PROTECTING COMMUNITY FACILITIES

We support this policy.

POLICY RNP24 – COMMUNITY LAND OFF HALE CLOSE & DUNSELLS LANE

We support this policy.

Comments submitted on 25th January, 2019 by:

[REDACTED],

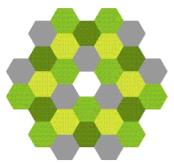
[REDACTED]

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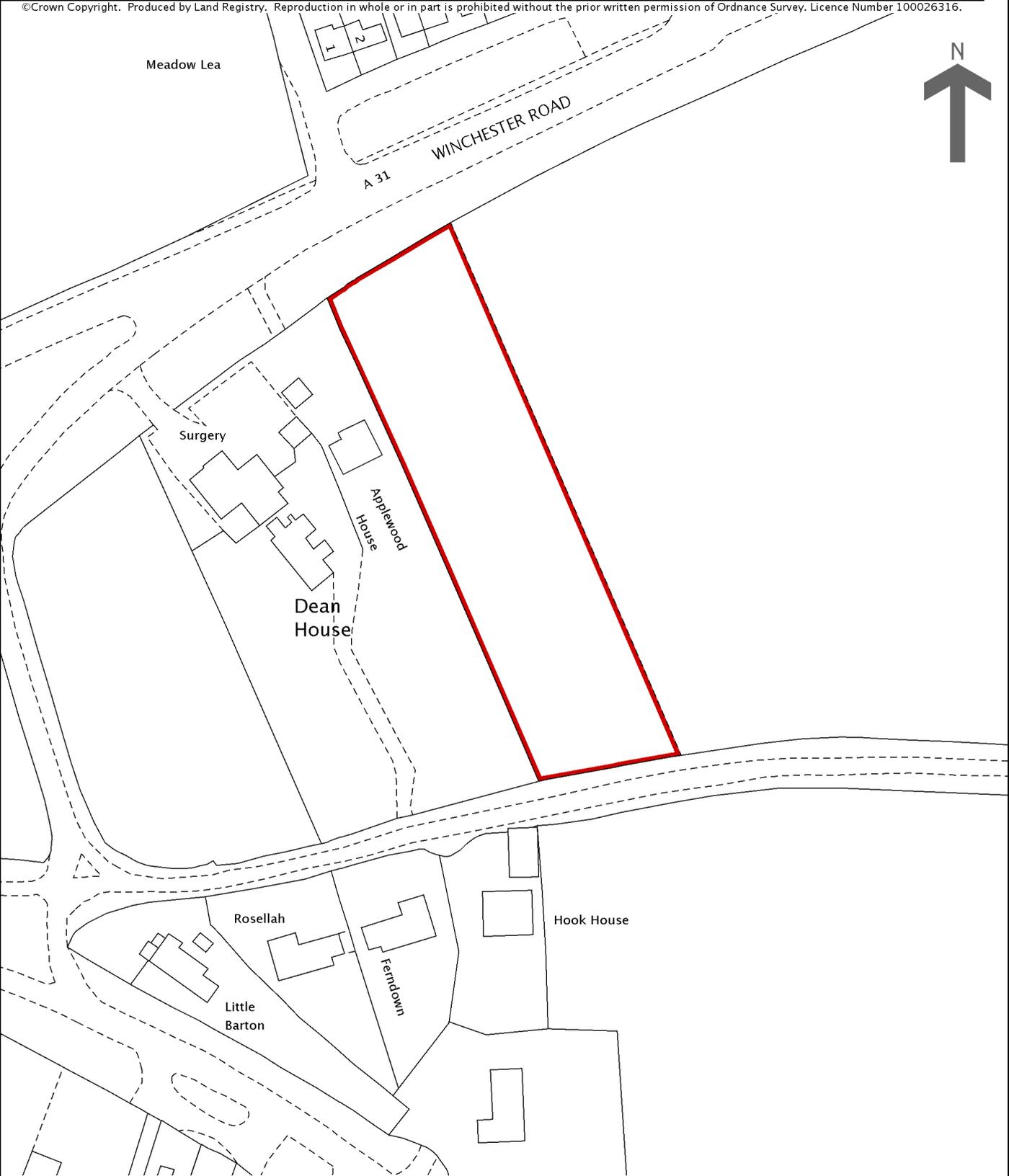
[REDACTED]

Tel: [REDACTED]

e-mail: [REDACTED]



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P17-2144PL

25th January 2019

REH19

Submitted by email only

Planning Policy
East Hampshire District Council
Penns Place
Petersfield
Hampshire
GU31 4EX

Dear Sir/Madam

Re: Ropley Neighbourhood Plan regulation 16 submission documents.

Representations submitted on behalf of [REDACTED]

I am writing to you, on behalf of [REDACTED], who are the joint owners of 2 parcels of land in the village of Ropley, and their development partners, [REDACTED]

These representations follow on from those submitted in March 2018. They are submitted in response to the Regulation 16 Submission version of the Ropley Neighbourhood Plan (NP), which was published in December 2018. The deadline for representations has been set at 5pm on Friday 25th January 2019.

In our March 2018 representations, we commented on the soundness of several policies, and suggested various amendments to the Regulation 15 version of the NP. None of the suggested amendments have been adopted in the Regulation 16 version of the NP. We would like to comment on each of the relevant policies as follows:

1. Proposed Housing Delivery - Policy RNP18

We previously stated that the NP's suggestion, that just 56 new dwellings are needed between 2016 and 2028, was too low. It should be increased to 110 dwellings to meet the Full Objectively Assessed Housing Need (FOAHN) in the parish, as required by the July 2018 version of the NPPF, and set out in the SHMA.

Pegasus Group

[REDACTED]

T [REDACTED] | **W** www.pegasuspg.co.uk

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PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

In the response to our representations, we have been advised that the housing needs assessment by AECOM put forward 5 alternative approaches. The Steering Group chose one of the options with the lowest number and EHDC did not dispute this approach. However, this does not remove the fact that the FOAHN for the Parish will not be met by the proposals in the NP.

The Pre-Submission version of Policy RNP18 made provision for 73 new dwellings in Ropley Parish in the period 2016-2028. This included 46 dwellings with planning permission and allocations for a further 27 dwellings.

Policy RNP18 now states that provision will be made for about 68 new dwellings in Ropley Parish in the period 2016 to 2028. Of these dwellings, 41 (reduced from 46) already have planning permission and the NP allocates 3 sites for a further 27 dwellings. In our opinion, as previously argued, this policy does not allocate enough land for housing. The FOAHN for the Parish clearly requires the allocation of 69 dwellings (110 minus 41) in the plan period, which is 42 more than the policy actually allocates.

For the reasons set out above, and in our representations of March 2018, it is considered that the wording of policy RNP18 should be amended to the following:

"Provision is made for about 110 new dwellings in Ropley Parish in the period 2016 to 2028, which will be delivered by..."

2. Critique of Site Assessment Scoring

We previously stated that when seeking to decide which sites to allocate in the NP, the Steering Group undertook a scoring assessment of each site against a number of criteria. We pointed out several concerns, which are summarised as follows:

- There is inappropriate weighting of the criteria, such that more important criteria are scored in exactly the same way as less important criteria.
- Scoring does not adequately reflect the accessibility and sustainability of the location of each site.
- One criteria regarding Local Green Space (LGS) is scoring sites against something that has not even been formalised yet.
- There are errors in the scoring in relation to sites 12 and 14 (owned by my clients).

In response, we have been advised that the approach to scoring used is considered to be a reasonable approach and no amendments to this approach are suggested at this stage. Furthermore, although it is accepted that the scoring for site 14 was incorrect (criterion

ix – the site is not Local Green Space) and this has been amended, no such amendment will be made for site 12. The amendment to the scoring for site 14 is not sufficient to convince the steering groups that this site should be allocated.

Further errors in the scoring of site 14 are as follows:

- xii) Will only have a limited impact on the visual landscape – scored 1, should be 2. The reason for this assertion is that the site is not visible from the public realm. It is only visible from one private residence.
- xv) Not within a Groundwater Source Zone – scored 0, should be 2. The reason for this assertion is that the designation only affects a few metres of the site entrance adjoining Petersfield Road. The vast majority of the site (99%) will not be in the Groundwater Source Zone.

Currently, site 14 scores 24, when in fact, it should score 27

Given the assertion made above, in relation to increasing the number of dwellings allocated by Policy RNP 18, we consider that the Steering Group should re-consider its advice and re-visit the scoring. It should be noted that sites with the following scores have been allocated:

- Site 9 – Land between Homeview and Wyckham House – 26 out of 32.
- Site 22 – Former Chequers Public House – 24 out of 32.
- Site 28 – Land adjoining Hale Close – 28 out of 32.

In this context, if it had been scored correctly, Site 14 Land behind Hall Place Cottage, Church Street would have scored higher than both sites 9 and 22, which would have put it right in contention for allocation. Sites 12 and 13 have been scored only slightly lower than site 22.

In the context of the above assertion in relation to Policy RNP18, which is that several additional sites should be allocated to make sure that the RNP complies with the NPPF and provides the FOAHN in the Parish, it is considered that a new policy should be added to the NP, as follows:

- *Policy RNP21a*

Land behind Hall Place Cottage, Church Street is allocated for residential development of about 5 dwellings, as shown on the Proposals Map.

- *Policy RNP21b*

Land to the rear of The Forge is allocated for residential development of about 4 dwellings, as shown on the Proposals Map.

3. Critique of Proposed Site Allocations

We previously stated that we had several concerns regarding the 3 sites suggested for allocation in the NP. In summary, we asserted the following:

- Policy RNP19 – Land off Hale Close (Site 28).

We previously suggested that development on this greenfield site, which is not contiguous with the settlement boundary, would effectively be “out on a limb” and would not integrate fully with the existing settlement. The proposed community uses are unspecified and located remotely from the edge of the settlement. Traffic levels may also be a concern.

In response, we have been advised that the offer of affordable and social housing, the landowner gifting some of the land to the community and a limit of 14 units have been given a great deal of weight.

It is considered that the development at Hale Close will result in a large protrusion of built form into the countryside, which will be out of keeping with the character of the village and the historic setting of St Peters Church, a Listed building. It is interesting to note that the offer by the landowner of a modest range of benefits, including unspecified community uses, some affordable housing and a car park for the church, are considered to outweigh the clear and obvious harm that the development will inflict upon the village and its setting.

In this context, it should be noted that my clients have made it very clear that they are prepared to offer 60% of their site to the community, to provide a new car park for the school, nature reserve, footpaths and public open space. The provision of off-site parking will free up space within the school grounds for improved school facilities, which will benefit the education of the children of Ropley. However, it should be noted that the land being offered would not need to be used for car parking and could be used for other purposes, if the local community would prefer. Furthermore, the housing on sites 12 and 14 could include affordable and self-build provision, if that is what the village requires. If this package were given adequate consideration as part of the assessment of sites 12, 13 and 14, it is likely that they would have scored much more highly in the site evaluation exercise than site 28, which is proposed for allocation.

- Policy RNP20 – Former Chequers Public House (site 22).

Previously, we had no objection to the allocation of this previously-developed site for the development of 9 dwellings. However, it should be noted that it is located some considerable distance away from the centre of the village, on the A31 Winchester Road, such that it is not in a sustainable location. Future residents will have to drive their cars to the school, church and local shop, as they will be located too far away to walk and the roads they will have to use do not have footpaths or street lights. Sites 12, 13 and 14 are located within easy walking distance of the school, church and local shop. They are far more accessible and sustainable locations than site 22.

- Policy RNP21 – Land between Homeview and Wykeham House, Petersfield Road (Site 9).

In our previous representations, we stated that EHDC had previously rejected the allocation of this site on the grounds of it not being in a sufficiently sustainable location.

In response, we have been advised that the site adjoins existing housing development and offers potential for self-build housing with the support of the landowner. With respect, this justification could equally apply to my client's sites, which also adjoin existing housing and could accommodate some self-build housing, if that is what the village requires. Furthermore, as is the case with site 22, future residents will have to drive their cars to the school, church and local shop, as they will be located too far away to walk and the roads they will have to use do not have footpaths or street lights. Sites 12, 13 and 14 are all located within easy walking distance of the school, church and local shop. They are much more accessible and sustainable locations than site 9.

4. Critique of Assessment of Sites 12, 13 and 14

My clients site, which lies in the heart of Ropley between Hammonds Lane to the west and School Lane to the east, is divided into 3 smaller sites, namely:

- Site 12 – Land to the rear of The Forge (western part of the site)
- Site 13 – Land opposite Ropley School (centre of the site and the village)
- Site 14 – Land behind Hall Place Cottage (southern part of site)

In the site assessment report, each of these sites is described in exactly the same way, even though they are individually different.

The sites are described as "visible from higher ground", but this only applies to site 13. They are all described as "backland development", when none of them are.

In the response to our previous objection, the Steering Group has agreed to remove the word “backland” from the description. However, the response confirms that the NP now designates all 3 sites as a Local Green Space.

Also in the response, the Steering Group refers to our offer of 4 dwellings on site 12 and 5 dwellings on site 14, including some smaller affordable units. The offer to gift the remaining land to the village is noted and the offer of a car park for the school is welcomed. However, it is considered that it would be likely to increase congestion of traffic at the junction by the school. Therefore, these offers do not weigh sufficiently in favour of the sites to justify allocation.

It is considered that this analysis is flawed. On the one hand the allocation at Hale Close includes the provision of a new car park and community uses. No doubt these will increase traffic congestion in the village, but this is not seen as a problem. It is not clear if the Highway Authority has agreed this allocation or not. The offer of a car park for the school [REDACTED] will not only improve traffic flows and highway safety, by taking parked cars off narrow lanes, such as Church Street, but it will also free up space within the school grounds to accommodate new development, which will improve school facilities. The current arrangement, with parents parking on Church Street, and then walking their children along this narrow lane with no footpaths or street lighting, is clearly dangerous. The offer of a new car park, directly opposite an entrance to the school, which will provide significant improvements to pedestrian safety, must be given due consideration, for the major benefits it will bring to the village. Furthermore, the offer of a substantial new public open space in the heart of the village, close to the school and the church, has been given no weight whatsoever, which is quite astonishing, given the health and wellbeing benefits that would be enjoyed by villagers for decades to come.

Specifically, Site 14 lies outside of the LGS, has direct access onto Petersfield Road, is not in a groundwater source zone, is not visible from key vistas, including Vicarage Lane, and could offer considerable benefits to the village in terms of providing much needed new homes in a sustainable location close to the heart of the village. The owners of the land would be prepared to sit down with the Steering Group, and other key stakeholders, to discuss what types of housing would be best suited to this location, including affordable, key-worker and open-market housing for first-time buyers, up-sizers and down-sizers. Homes could be offered first to local residents and workers, such as school teachers, to ensure that they fully meet the needs of the village and create a legacy for many decades to come. Development on Site 14 would not harm any key views and would enable the creation of a public open space in the centre of the village for many

decades to come, to the considerable benefit of all of the villagers and not just a chosen few.

Site 12 is also suitable for development, because it is a logical “infilling” site along Hammonds Lane. Like site 14, it could be developed for a mix of house-types and tenures, including affordable housing. We would welcome the Steering Groups advice on what type of housing would be most suitable in this location.

None of the sites suggested for allocation can provide the benefits to the village that my clients’ site will provide. The Steering Group needs to completely re-consider its approach to site allocation, both in terms of the number of dwellings to be provided (see above comments) and the sites, which it considers to be suitable. More sites need to be allocated and sites 12, 13 and 14 should be re-considered for allocation for the reasons set out above.

5. Proposed Local Green Space (LGS) – Policy RNP8

Site LGS3 - We previously submitted that the designation of my clients’ land to the west of School Lane and Church Lane as LGS3, was not in compliance with paragraphs 76 and 77 of the NPPF. The July 2018 version of the NPPF has replaced these paragraphs with 99 and 100, which contain broadly the same wording.

In its response to our representations, the Steering Group has said that the designation of LGS3 is supported by residents, who appreciate it for its vistas, tranquillity and role in preserving the historic character of the village centre.

What perhaps was not put to residents, was the suggestion by my clients that only one peripheral part of the site (site 12) could be developed for housing, while the rest of the land (site 13) could be gifted to the village to provide a public open space with equally enjoyable vistas, tranquillity and preservation of the historic character of the village centre, which could be enjoyed far more by residents if open to public access at all times. The benefits to the school and village life would outweigh the modest incursions into the open land. It should be noted that site 14 lies wholly outside of LGS3.

Site LGS5 - land south of Vicarage Lane and west of Hammonds Lane, is also in the ownership of my clients. This land has been designated in the current version of the NP as LGS5, which was not listed in the previous version of the NP.

On behalf of the owners of this land, we strongly object to the unilateral designation of this land as LGS. No discussions have taken place with the land owners. The unilateral designation seems to be in response to comments submitted by residents who live in

large houses adjoining the land, to the north in Vicarage Lane and to the east in Hammonds Lane. The site is largely land-locked and public views across it are extremely limited. The land adjoins part of the western side of Hammonds Lane, but views across the land from the lane are largely obscured by a dense hedgerow and trees along the site boundary. There is an entrance gate to the field, but this is the only place from where the public can view the land. Almost all of the views across the land are from private residences. No doubt these are the people who wrote in and suggested that the land should be re-designated. All the NP is doing is preserving the private views of a few privileged individuals. The public good is not being well served by this designation.

Another consideration is the fact that sheep are regularly driven through the village, much to frustration of many villagers and motorists. In addition, the NP (paragraph 7.037) suggests that the site is visible from Petersfield Road to the south. This is factually incorrect. The interior of the site is only visible from one gate on Hammonds Lane. Neither photograph on page 38 of the NP is of the land now designated as LGS5. This placement of totally irrelevant photographs next to the description of my clients' land is misleading and disingenuous.

Designations LGS3 and LGS5 should be removed from the plan, for the following reasons:

- Neither site has public access.
- Neither site is historically significant.
- Neither site contains rich or unusual wildlife.
- LGS5 is almost entirely enclosed by dense hedgerows and trees, with limited private views, which only benefit a privileged few adjoining residents.

In this context, Policy RNP8 should be amended, and both sites LGS3 and LGS5 should be deleted.

6. Single Width Access and Sunken Lanes – Policies RNP5 and RNP6

In our previous representations, we suggested that Policy RNP6 – Sunken Lanes should be deleted and incorporated into an amended version of Policy RNP5. This policy should be amended to include additional flexibility where development proposals would not harm road safety, ecology or existing trees/hedgerows.

The Steering Groups response to this suggestion has been to refer to amendments made to Policy RNP5 in response to concerns raised by residents (and not the Highway Authority?). The policy now reads as follows:

"A new development of more than 5 dwellings will not be permitted if the site access would be from a narrow lane as defined in the glossary, unless it is within 125 metres from a two-vehicle width road." (amendments to previous version of policy underlined).

The policy has been made much more restrictive, as even fewer sites will now meet the criteria of the policy. As before, we object to this policy for its restrictive and inflexible approach. The new, amended version is even more inflexible and unnecessarily restrictive. At the very least, this policy should revert to the previous version of the policies reference to a distance of 250 metres from a two-vehicle width road, rather than 125 metres, which is unduly restrictive and unnecessary.

7. Vistas and Visual Prominence – Policy RNP3

The previous version of the NP included the designation of a Key Vista, which looked south at the northern end of site 13. At present, local residents and road users can look through a low hedge and 5-bar gate and across the land, which is used for animal grazing. However, they cannot access the land, because it is privately owned and in use as farmland. The designation of this Key Vista is not objected to, because it is simply an acknowledgement of a view that currently exists. However, the wording policy RNP3 is unduly inflexible and obstructive.

The policy seeks to prevent any development, unless it would have "no adverse impact" on the landscape. The restrictive phraseology could prevent development that would otherwise have an extremely positive impact on the life of the village. In this instance, my clients are proposing a new car park for the school, a play area for the children and use of the field as public open space, as well as much needed new housing on peripheral parts of the land. However, it could be subjectively concluded that this would have an "adverse impact" on the view and therefore it must be refused. In this context, we suggest that the wording of Policy RNP3 should be made more flexible, as follows:

Policy RNP3: New development will not be permitted within Key Vistas or Areas of Significant Visual Prominence unless it can be shown that it would have no adverse impact on the visual appearance and character of the landscape or the benefits of the development to the local community, outweigh the dis-benefits".

8. Settlement Boundary – Policy RNP2

We previously submitted that the settlement boundary should be extended in the vicinity of Hammonds Lane to encompass land between The Forge in the north and Little Chesters in the south. This would be a logical infilling of the frontage along Hammonds Lane.

The Steering Groups response is to say that this suggestion is unacceptable, because development of this site would be contrary to policy on the grounds of unacceptable access.

It is considered that this is not how you decide on settlement boundaries. Settlement boundaries should follow logical lines of natural and man-made features on the ground. Although, in this case, there is no tree or hedge line, the fact that the land in question is such a logical “infilling” of a gap in an otherwise built-up frontage, is reason enough for it to be considered appropriate. There may be other ways to access the land in question, such as off Vicarage Lane to the north or through land associated with The Forge. In any event, it is not appropriate to reject a site, when setting a settlement boundary, on the grounds of it having only one option for access, which is considered inappropriate.

It should be noted that the Steering Group is proposing to extend the settlement boundary to encompass the allocated land at Hale Close (Policy RNP19), even though the land is not contiguous with existing developed areas and the boundaries of the land cut across an open field, leading to an incongruous protrusion into open countryside.

On this basis, we consider that the sensible and logical re-drawing of the settlement boundary should be re-considered to include land between The Forge and Little Chesters on the east side of Hammonds Lane (Site 12). This area could be added to the Ropley Village Centre SPD.

9. Summary and Conclusions

As previously submitted, it is considered that the Ropley NP fails to meet 2 of the basic conditions required for a NP to meet housing need, namely:

- That it must have appropriate regard to national policy; and
- That it must contribute to the achievement of sustainable development.

The NPPF clearly states that Full Objectively Assessed Housing Need (FOAHN) must be the starting point for all housing provision. In this context, scenario 1 in the Housing needs Assessment must be the starting point for this plan. This states that 156 dwellings are needed from 2011 to 2028, or 110 in the plan period (2016 to 2028).

The approach to housing allocations was flawed, because a much lower figure has been adopted – just 68 dwellings in the plan period. After 41 dwellings with planning permission have been deducted, this leaves only 27 new dwellings to be allocated. This figure is far too low and will not meet the FOAHN of the parish. Land for at least an additional 42 dwellings needs to be allocated in the NP by Policy RNP18, in order for it to

meet housing need in full and comply with the NPPF. It is not sustainable development if the FOAHN of the parish is not met by the NP and the plan cannot be considered to be sound.

The 3 suggested allocation sites are flawed. Two of the sites have been selected, because they are “previously-developed”, even though they are in remote locations nowhere near the centre of the village. The site at Hale Close has been selected because it will provide community benefits, such as a car park, which could also be provided on other sites, such as my clients land.

The scoring of my clients’ sites was flawed. Sites 12, 13 and 14 are in the heart of the village and offer considerable community benefits. They have different features, but the Steering Group scored them exactly the same. Site 14, for example, does not lie in LGS3, while the others do. None of the sites should have been described as “backland development”. Site 14 is not in a Groundwater Source Zone or a sensitive landscape. Sites 12 and 14 should be allocated in the NP for new housing. This will help to address the significant shortfall in the amount of new housing being proposed, to fully meet local need. The owners of sites 12, 13 and 14 would be willing to sit down with the Steering Group and other key stakeholders to agree a mix of housing types to meet the needs of the village.

The designation of LGS3 and LGS5 is flawed. LGS3 is private land and views across it are not sufficient to justify its designation. LGS5 is a new designation in the revised version of the NP and seems to have been demanded by a few privileged objectors, who own large houses overlooking the land, which is open and in agricultural use at the moment. However, public views of the land are minimal and do not justify the proposed designation. Designations LGS3 and LGS5 should be deleted.

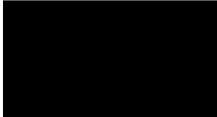
Policy RNP5 regarding sunken lanes has been made more onerous, simply because a few residents have requested this. No mention is made of the amendment being requested by the Highway Authority, because of a particular concern regarding highway safety. This policy should revert back to its original wording.

Policy RNP3 concerning vistas and visual prominence needs to be re-worded to make it more flexible, so that development can come forward when the benefits outweigh the dis-benefits.

Finally, Policy RNP2 regarding the settlement boundary needs to be amended to include a small strip of land on the eastern side of Hammonds Lane (site 12), which is suitable for infill development and cannot be dismissed on the grounds of access alone.

Overall, it is considered that the amendments to the NP, following on from the representations submitted in March 2018, have not gone far enough to adequately address our considerable concerns. It is hoped that the above comments will be given full consideration, and further amendments to the NP will be made to address the flaws and deficiencies highlighted above.

Yours faithfully



Director

Our Ref: 01B816587/rjzg

25 January 2019

Planning Policy
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Dear Sirs

RESPONSE TO ROPLEY NEIGHBOURHOOD PLAN SUBMISSION VERSION CONSULTATION

[REDACTED] OPLEY LIME QUARRY, SOAMES LANE. ROPLEY

GVA's Midlands Planning Development and Regeneration (PDR) department is instructed by the [REDACTED] to provide town planning advice in respect of Ropley Lime Quarry, Soame's Lane, Ropley.

Outline planning permission was granted previously for the erection of six dwellings on the site. GVA subsequently submitted an outline planning application for ten dwellings to East Hampshire District Council (EHDC), under the reference 20209/011. The application was recommended for approval by officers, but was refused by members at EHDC's Planning Committee.

Nevertheless, the site benefits from an extant permission for the extraction of minerals. The LPA Receivers intend to recommence quarrying and are in the process of preparing an application to discharge pre-commencement conditions.

GVA previously responded to the pre-submission draft consultation on the Ropley Neighbourhood Plan ('RNP'). That response raised issues with the premise of the RNP, including concerns about the lack of engagement with GVA or the owners of the Ropley Lime Quarry and failure to include the Ropley Lime Quarry as an allocation for residential development despite an extant planning permission for housing at that time.

We do not intend to repeat those issues in these representations, but still have concerns about the preparation of the plan.

This response focuses on policies within the RNP that are of relevance to Ropley Lime Quarry. We maintain that the following policies require amendment to ensure that the RNP meets the basic conditions (as required by Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended)) and contributes to achieving sustainable development.

Response to Proposed Policies

RNP3: Vistas and Visual Prominence

This policy seeks to restrict development within areas designated as 'Key Vistas or Areas of Significant Visual Prominence'; unless it can be shown that it would have no adverse impact on the visual appearance or character of the landscape.

This designation is now proposed to include the eastern part of Ropley Lime Quarry, shaded red on the attached plan. This area was not included in the Pre-Submission Draft designation. No justification for the inclusion of this part of the site is provided in the policy, supporting text or evidence base.

The proposed amendment is not appropriate. Quarrying will recommence shortly and will have a significant adverse impact on the character of the landscape. This change in character will occur regardless of the designation. As a result, there is no merit in extending the designation across the quarry site.

We request that the designated area for 'Key Vistas or Areas of Significant Visual Prominence' is amended to remove the eastern part of the Ropley Lime Quarry site.

RNP10: Nature Conservation

This policy identifies three Local Nature Conservation Networks (LNCN) within the RNP area. The policy states that development proposals within the boundaries of a LNCN will not be permitted unless the need for, and benefits of, development outweigh the harm.

One of the LNCNs identified is the Ropley Ridgeline, which includes the Ropley Lime Quarry to its southern edge.

The inclusion of the quarry within this network is inappropriate. Quarrying will recommence shortly. The activity will be carefully controlled to ensure that no harm is caused to protected species. However, a general reduction in the ecological value of the site is inevitable. Once activity commences, the quarry will no longer meet the criteria for designation as a LNCN. The designation of the site as an LNCN cannot prevent quarrying, hence the designation would have no effect.

GVA requests that the Ropley Ridgeline Local Nature Conservation Network be amended to exclude the Ropley Lime Quarry.

GVA's Recommendations

We conclude that the RNP should be modified as follows in order to ensure the Neighbourhood Plan meets the basic conditions and contributes to achieving sustainable development.

- The designated area for 'Key Vistas or Areas of Significant Visual Prominence' should be amended to remove the eastern part of the Ropley Lime Quarry site.
- The Ropley Ridgeline Local Nature Conservation Network should be amended to exclude the Ropley Lime Quarry.

We hope that these alterations will be made to the RNP prior to submission for Examination. The LPA Receivers are committed to engage in the examination if not.

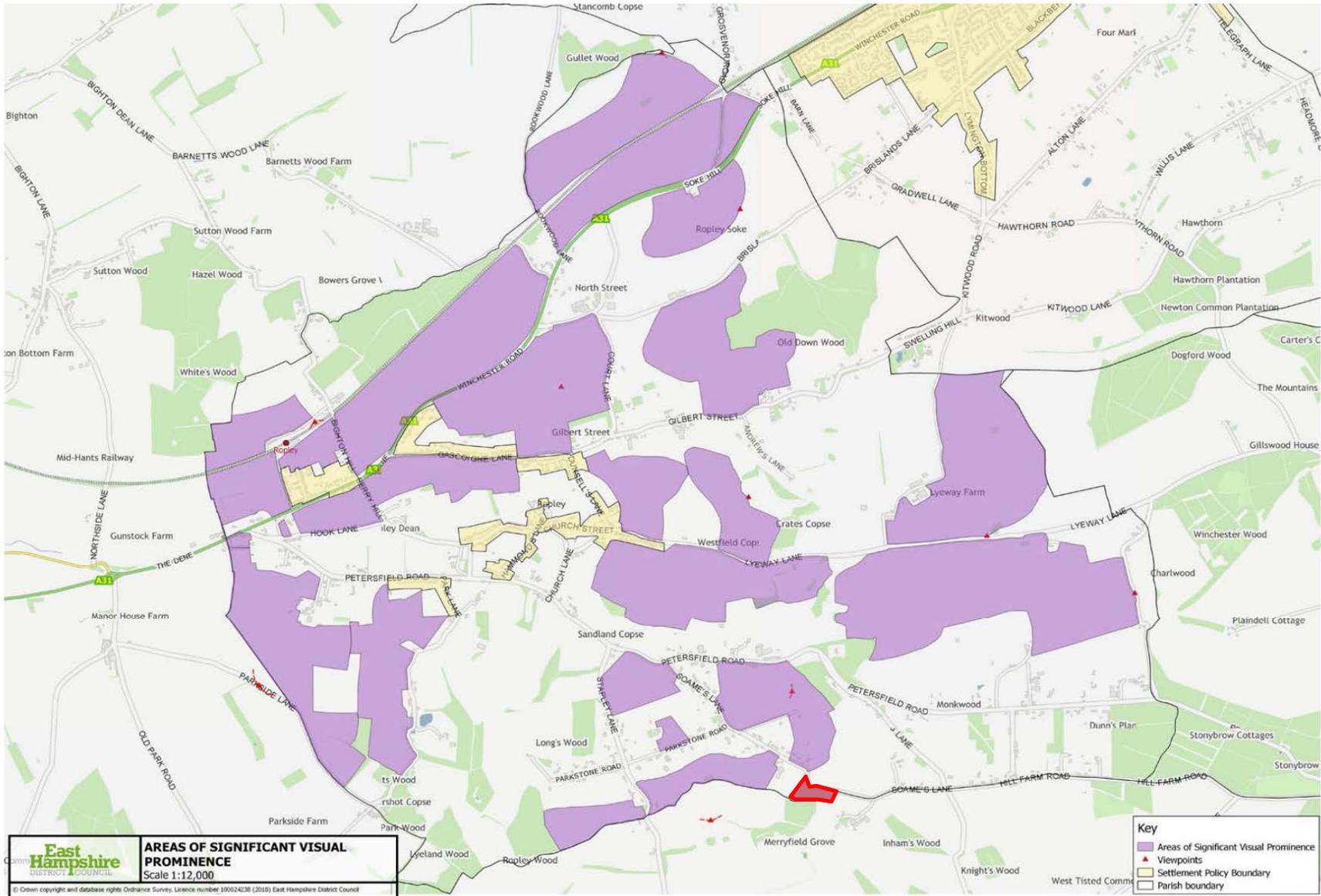
If you require any further information about the details of these representations, please contact [redacted] of this office via telephone on [redacted] or via email [redacted].

[REDACTED]
January 25, 2019
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Yours faithfully

[REDACTED]

For and on behalf of GVA Grimley Limited



RNP3: MAP 2 - AREAS OF SIGNIFICANT VISUAL PROMINENCE