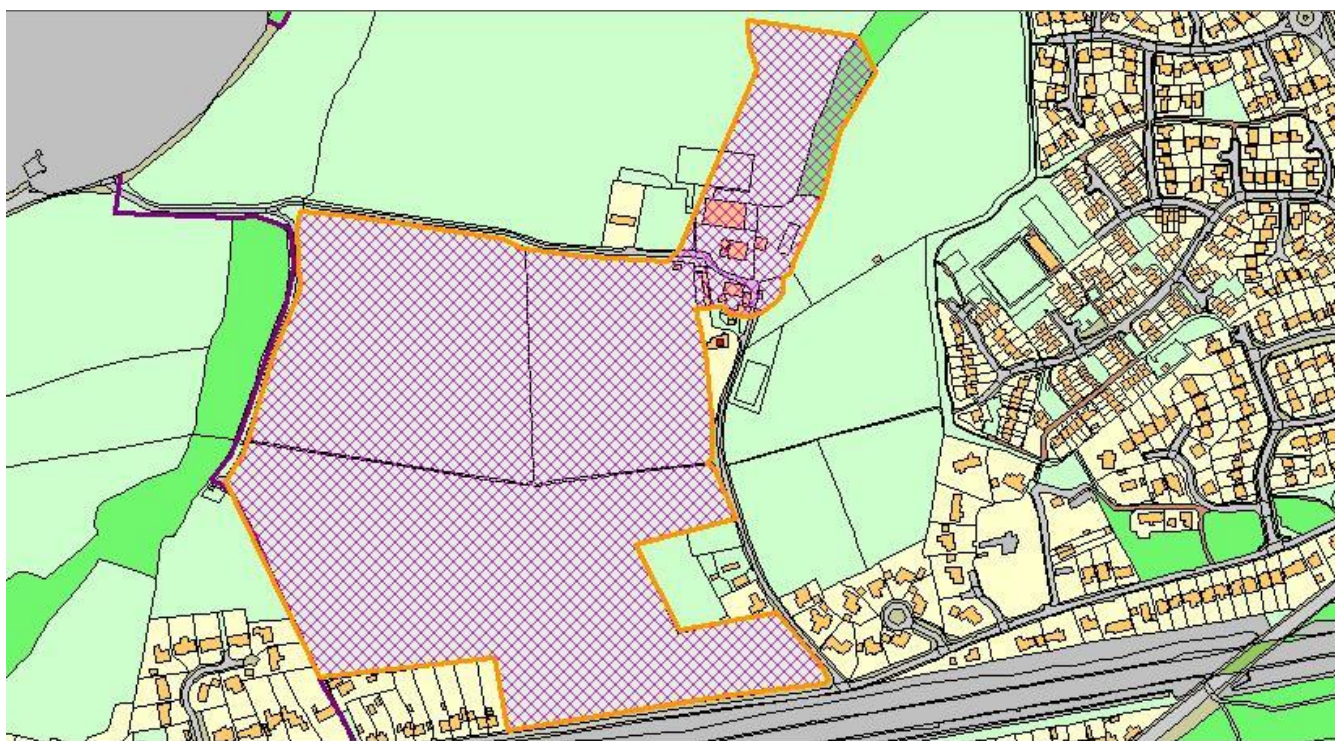


COMMITTEE REPORT

APPLICATION NO.	21/01048/OUT
LOCATION	Owens Farm Newnham Road Hook Hampshire RG27 9NG
PROPOSAL	Hybrid application for a) Outline development (with matters except access reserved) for a retirement care living development comprising up to 160 units (C2 use) and local community facilities, pedestrian and vehicular access, parking areas and landscaping and b) change of use of agricultural land to Suitable Alternative Green Space (SANG) with sustainable drainage pond
APPLICANT	Apsley House Capital Plc
CONSULTATIONS EXPIRY	4 June 2021
APPLICATION EXPIRY	29 July 2021
WARD	Hook
RECOMMENDATION	Refuse



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BACKGROUND

This application is brought before the Planning Committee at the discretion of the Head of Place. This is in line with Appendix A (1b) of the Council's Constitution relating to the Scheme of Delegation as The Head of Place considers that the application should be considered by Planning Committee.

THE SITE

The application site is located to the west of Hook and comprises an area of 15.62ha. The site is bound to the south by Newnham Road from which access is gained to Owens Farm via a narrow track, which provides access for other residential properties. The site currently contains farm buildings which are located in the north-eastern corner of the site, and they are surrounded by grazing and arable land. The dwelling known as High Ridge House and the farmhouse and granary at Owen's Farm adjoin the site to the north and east respectively.

The site is located outside of the settlement of Hook in the open countryside and forms part of the Hook to Newnham Local Gap as defined by the Hook Neighbourhood Plan.

It lies within a Flood Zone 1 location which has the lowest risk of flooding.

To the south of the site, on the opposite side of Newnham Road, a railway line (London - Southampton Line) runs parallel to the road. The western boundary of the site runs along the western boundary of the District which is shared with Basingstoke and Deane Borough Council (BDBC). To the southwest there is residential development along Newnham Road towards the village of Newnham (designated as a Conservation Area). To the east and southeast there is residential development forming part of the Hook settlement located around Newnham Road, Church Path and Hop Garden Road.

RELEVANT PLANNING HISTORY

The development site has been the subject of numerous applications for development of small scale as part of the farms within the land, however the most relevant planning history is shown below:

17/02317/OUT - Outline permission for the development of up to 700 dwellings, a 2ha site for a primary school, a 0.5ha site for a nursery, a 245m² retail facility, a 284m² community facility, together with associated vehicular, pedestrian and cycle access, open space and landscape works. All matters, other than access, are reserved for consideration at a later date. Full planning permission for the provision of 9.68ha Suitable Alternative Natural Greenspace and means of access. Refused 20.06.2018

17/00857/EIA - Scoping Opinion under Regulation 13 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (as amended 2015). Issued on 12.05.2017

PROPOSAL

This hybrid application seeks outline and full planning permission for the following elements:

a) Outline permission (with all matters reserved except access) for a retirement care living development comprising up to 160 units (C2 use) and local community facilities, pedestrian and vehicular access, parking areas and landscaping; The housing provision would comprise:

24 no. care bedrooms - En-suite bedrooms
7 no. close care units (2 bed /2-person flats)
29 no. linked care units (10 x 2 bed 2-person flats and 19 x 2 bed 3-person flats)
100 no. extra care units (10 x 1 bed 1-person flats, 80 x 2 bed 3-person flats, 10 x 2 bed 3-person bungalow)

The parking provision for the residential element of the proposal would be 148 spaces. The break down provided is as follows:

100 spaces to serve the 100 extra care units (Parking standard applied - Active elderly residents with resident warden).

15 spaces to serve the 60 units in core building (Parking standard applied - Nursing/rest homes).

23 spaces to serve as staff parking for the 30 care staff (Parking standard applied - Nursing/rest homes).

10 spaces to serve the SANG proposed.

b) Full Planning Permission for change of use of agricultural land to Suitable Alternative Green Space (SANG) with sustainable drainage pond.

CONSULTEE RESPONSES (Summarised)

Hook Parish Council

Objection.

- Hook Parish Council strongly objects to the proposals presented in this planning application.
- Detrimental impacts to the Gap
- Detrimental countryside and landscape impacts cannot be justified with questionable public benefits.
- Significant environmental, social, economic and residents' well-being impacts from high car use.
- SANG is out of character, it does not blend with locality with formal footpaths and car parking.
- There is a need of Specialised accommodation in the District but not all evident in Hook. There are already new facilities for this type of accommodation under construction in the centre of the village.
- Definitions of care in the mix of units are unclear and how relate to the Local Plan categories is not transparent.
- Claims of future sustainable travel solutions for the site are totally unfounded.
- This site is relatively isolated from Hook village and any public transport, there are not contiguous footpaths to Hook, cycle infrastructure is lacking, and it cannot be relied on community groups for transport needs of this community.
- Upgrade of footpaths (surface/lighting) would have environmental impacts.
- Highway safety concerns.
- Proposal fails to meet requirements of the Local Plan, The Hook Neighbourhood Plan and the NPPF and should be refused.

Newnham Parish Council

Objection.

- Detrimental to Gap designation.
- Detrimental to rural/agricultural setting of the area.
- SANG proposal would change the nature of the landscape to a suburban parkland.
- The historic Church Path route, the environment and wildlife, amenity of residents of both settlements and their physical/mental wellbeing would be affected by the intrusion/modifications by a housing development and a SANG.
- Sense of separation and rural isolation will be lost.

Chief Planning Officer (Basingstoke & Deane Borough Council)

Objection, the development would:

- Have a negative impact on the area between Newnham and Hook, infilling a strategic gap.
- Be detrimental to the local character having an undesirable urbanising effect on the rural setting of the Newnham Conservation Area (NCA).
- Have a possible impact on Hook Common SSSI 100m to the south of the site and on The Strings Site of Importance to Nature Conservation (SINC) both which lie within BDBC.
- Be detrimental to the landscape character by introducing large scale-built form in open countryside.
- Be detrimental to the visual amenity from public rights of way across the site and views towards College Copse SINC- Ancient Woodland, Owens Farm Meadow SINC and Owens Farm Southeast SINC.
- More information is needed to understand the impact of the proposal on heritage assets.
- Heritage Statement concludes the harm to the setting of the NCA would be negligible based on the current proposal. BDBC cannot agree with this conclusion.
- Taking this NE objection into account it is concluded that further information is necessary in order to: "Assess the effects of the proposed development, whether beneficial or harmful, on the significance [of the heritage asset] or on the ability to appreciate it" and "Explore ways to maximise enhancement and avoid or minimise harm".
- Views out of the NCA on its eastern edges relate particularly to two open areas. Although these are not within the Conservation Area, they make an important contribution to the character of the area.
- These two open areas are marked on the NCA Appraisal Map (see below) as Open Areas of Village Scape Significance (OAVSS).
- The submitted LVIA has not referenced or assessed the NCA Appraisal Map vistas, described as: "important general view[s] especially of the wider landscape setting".
- The proposal does not demonstrate that conflict with the heritage asset's conservation will be avoided/minimised. There is no clear and convincing justification for this harm

Natural England

Objection.

As submitted, the application could have potential significant effects on the Hazeley Heath Site of Special Scientific Interest (SSSI), which forms part of the Thames Basin Heaths SPA.

Natural England advise that this proposal is not currently in accordance with Policy NRM6 or the Hart Thames Basin Heaths Local Plan Policy.

Thames Water Property Services

No objection, subject to conditions to ensure:

Capacity exists off site to serve the development or a development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water.

Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or all wastewater network upgrades required to accommodate the additional flows from the development have been completed.

Highways England

No objection.

Historic England

Historic England does not wish to offer any comments, seek the views of your specialist conservation and archaeological advisers, as relevant.

Network Rail - South East Territory

No objection subject to informative conditions to protect Network Rail assets.

Grounds Management

Objection on lack of information to determine this application.

Full management plan is required covering (but is not limited to) the following areas:

- Fully costed details of the maintenance and delivery of the SANGs.
- Financial detail on how this will be achieved over the 80 years
- Details of monitoring for its success
- Visitor Strategy (how are you engaging with your users /how is this dog friendly?)
- Details of the appropriate authority who will be managing the SANGs
- Equalities and Diversity assessment
- Climate Change / sustainability assessment (ideally a carbon neutral/negative provision)
- Detail on access for emergency vehicles
- Details and specifications for all the built features/paths/signage/etc

There are two current access routes across the site and there is no supporting information of the current level of use in line with the capacity of the SANGs. This will need to be detailed and discounted from the site.

There is sufficient SANGs in Hart to deliver the current Local Plan. Any surplus would raise questions on the viability of delivering the current avoidance strategy. This could cause previously agreed SANGs to fail and pose a threat to the SPA.

The proposed circular path does not meet the "Must Have" requirements in the SANGs guidelines. Paths should also have a minimum of 100m between them in open ground.

No car park is provided so the developer must confirm that the SANGs will only be for the sole use of the development.

There should be a perimeter boundary that is secure for dogs getting out.

Conservation/Listed Buildings Officer (Internal)

No objection.

Lead Local Flood Authority (HCC)

Objection.

The ground investigation report submitted concluded that soakaway drainage would not be suitable at the site, however, an infiltration pond has been proposed at the north of the application site.

Infiltration testing in full accordance with the BRE365 at a depth and location commensurate with the infiltration features is required.

Applicant to demonstrate that there will be at least 1m unsaturated zone between the base of any infiltration feature and the highest groundwater level recorded including winter months.

Calculations and values used for the greenfield runoff rates and proposed discharge rates are required.

The ditch where surface water drainage is proposed to be discharged to appears as an offline drainage feature. Discharging surface water into an offline system will increase surface water flood risk downstream. Additional information on the watercourse location, flow, direction route, evidence of gravity connection to another watercourses and evidence which demonstrate adequate capacity and condition for the proposed discharge rate is required.

Streetcare Officer (Internal)

No objection in principle. Proposed layout required showing appropriate access for a 26-ton Refuse Collection Vehicle. The plans required should also contain bin collection points, swept paths for vehicle movements and turning head/points.

Tree Officer (Internal)

Objection. The arboricultural impact assessment for the site does not comply with BS5837:2012 in that it does not provide standard information on individual trees, rather has lumped many into groups of trees even when species are mixed and provided average information, yet then shows some information within plan appendixes.

Within the northeast of the site a number of buildings are pushed up against the site boundary which is a woodland strip. Due to the proposed occupancy this is likely to lead to future conflict between trees and residents, as trees block out light and view and will lead to pressure to remove or reduce trees significantly.

Ecology Consult (Internal)

Objection.

Further bat emergence surveys on two buildings to be demolish is required prior to determination so the impacts on bats can be fully assessed.

The pond closest to the development was surveyed and found to be negative for GCN, two additional ponds were not surveyed however, attempts should be made to survey these ponds going forward to further inform the plans.

Full updated dormouse and reptile surveys will be required to be submitted, along with further details of the proposed mitigation for these species, at reserved matters stage.

The Biodiversity Metric has been applied and this appears to demonstrate a significant Biodiversity Net Gain (BNG) (51.88% habitat and 12.61% hedgerow units). However, this calculation includes the habitat enhancements on the proposed SANG and is therefore an overestimation of the BNG of the development. The current guidance is that habitat enhancements necessitated to meet SANGs requirements, or other legal compliance, cannot be used within the BNG calculation to avoid double counting. The BNG calculation should therefore be re-run to provide BNG values for the development only, excluding the required enhancements for SANG provision.

Local Highway Authority (HCC)

Objection.

The visibility splays should be 2.4m x 108m eastbound and 2.4m by 98m westbound. The applicant has attached an access drawing that displays visibility of 2.4m x 107.1m and 2.4m x 59.64m for eastbound and westbound traffic respectively. This does not correspond with the TG3 requirements.

Evidence of spare capacity is required to determine impacts of the proposal in the operation of the following junctions: Station Road / London Road / Elms Road, Old School Road / London Road and Newnham Road / London Road.

A footway would need to be constructed from the proposed sites access to the existing foot way at Seton Drive. Tactile paved dropped kerbs would need to be installed at Seton Drive. Improvements to footpaths 25b and 26 would be required and would need to be secured via S278.

Environmental Health (Internal)

No objection subject to planning conditions to secure:

- Hours of construction
- A Construction Management Plan
- An Acoustic Design Statement and Noise Impact Assessment

County Archaeologist

No objection, subject to planning conditions to secure a preliminary archaeological survey and archaeological mitigation strategy for any archaeological remains to be identified by the archaeological evaluation and appropriately recorded.

Landscape Architect (Internal)

Objection.

The conclusion of the Gap Analysis (GA) is not agreed. It is incorrect to use overhead (OH) powerlines as a justification for including additional built form into the countryside. OH powerlines can be a feature, albeit a detracting one, marching across an AONB, just as motorway or a railway line might, so in this regard they are not an influence on how a gap functions.

The characteristic of buildings being visible from many locations within the Gap around the edges recognises that the Gap is small but sufficient to inform that Hook is separate from Newnham, and vice versa. 5ha (12.5% incl. access road) in a broadly central location within the 49ha Gap, is developed with a central core at 3 storeys, descending through 2.5 to 1.5 storeys, including the site access road, also a form of development, that bisects the experience of the Gap on Newnham Road.

Currently, the forward view is devoid of large developments, buildings of Owens Farm, some of which are traditionally built is entirely in context with the countryside setting of the Gap and has no impact on its function.

During the summer when the hedgerow is in full leaf the development may be screened from immediate view, not so in winter, but will nonetheless be in the walker's awareness given the visibility a matter of a few minutes back from where they left Hook.

The supporting GA information for the application says that the development of the Gap with built form up to 3 storeys in height, maintains a physical gap between the two settlements, which is true. However, it is not true to say that the ability of the land to function effectively as a Gap is not compromised by the development. The extent of the Gap has been suitably tested. It cannot be argued that the area it covers is not necessary for its function; nor is it excessive. The function of the Gap will be significantly compromised by the proposals, contrary to Hook NP policy HK5 and HK6 and Hart LP 2032 policy NBE2 e).

Housing (Internal)

Objection.

It is unclear from the information provided what level of care is expected to be provided for each of these types of accommodation. Many older people are active into their later years and may not want or need the higher level of care provision. Some of the properties being proposed appear to allow for independent living.

Understanding what affordable housing provision is being proposed is required as there is little detail on this at present.

Planning Policy (Internal)

Objection.

Using new work on the need for specialist accommodation for the elderly, and factoring in new planning permissions, the updated need for residential/nursing care in Hart to 2035 is 160 bedspaces.

The new work also confirms that in meeting these needs, delivery should aim to match needs over the plan period rather than frontloading supply. Using this latest evidence, the need to 2025 is just 19 bedspaces, and to 2030 is 85 bedspaces.

The policy preference is for the district's needs to be met within settlements without encroaching into countryside unless it is necessary to do so to meet needs. Sites within settlements have been coming forward in recent months/years as illustrated by the planning permissions set out in the position statement.

Therefore, in light of the updated information on the need for care homes and supply, it is considered that there is insufficient need within the district to justify the release of a greenfield site in the countryside at this time. Under Policy H4 the applicant must also show that there are no alternative sites within settlements. It is apparent that the Geffery's House site within Hook is on the market and would appear to be of a size that would accommodate a care home.

PUBLIC COMMENTS

The statutory requirements for publicity in this instance, as set out in The Development Management Procedure Order 2015 (as amended) are neighbour letters together with the display of a site notice and a press advert. The Council's Statement of Community Involvement has been amended to align with the statutory publicity requirements.

The public consultation exercise expired on 04.06.2021. At the time of writing, 420 public representations have been received. 418 of these were submitted in objection to the proposal and 2 representations have been submitted in support or as neutral representations.

The grounds of objections can be summarised as follows:

- Encroachment on Strategic Gap
- Increased traffic
- No need for this type of accommodation
- Increased risk of flooding
- Impact on wildlife/ ecology
- Use of Greenfield site
- Unsustainable location
- Impact on infrastructure
- Impact on Historic PROW
- Contrary to Local Plan/ Neighbourhood Plan
- Impact on Countryside
- Impact on amenity
- Road safety/ access

CONSIDERATIONS

1. Planning Policy
2. Principle of Development
3. Landscape and Design
4. Sustainability and Climate change
5. Residential Amenity
6. Highways/Servicing and Parking
7. Flood Risk and Drainage

8. Ecology
9. Trees
10. Other Planning Considerations
11. Planning Balance

1. PLANNING POLICY

Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise.

The relevant adopted Development Plan for the District includes the Hart Local Plan: Strategy and Sites 2016-2032 (HLP32), the saved policies of the Hart District Local Plan (Replacement) 1996-2006 (HLP06), the Hook Neighbourhood Plan 2018-2032 (HNP) and saved policy NRM6 of the South East Plan. Adopted and saved policies are up-to-date and consistent with the NPPF (2021).

Hart Local Plan (Strategy and Sites) 2016-2032 (HLP32)

SD1 Sustainable Development
SS1 Spatial Strategy and Distribution of Growth
H1 Market Housing
H4 Specialist and Supported Accommodation
NBE1 Development in the Countryside
NBE2 Landscape
NBE3 Thames Basin Heaths Special Protection Area
NBE4 Biodiversity
NBE5 Managing Flood Risk
NBE7 Sustainable Water Use
NBE8 Historic Environment
NBE9 Design
NBE11 Pollution
INF1 Infrastructure
INF3 Transport

Saved policies of the Hart District Local Plan (Replacement) 1996-2006 (HLP06)

GEN 1 - General policy for development
CON 8 - Trees, woodland & hedgerows: Amenity Value

Saved policy of the South East Plan 2009 (SEP)

NRM6 - Thames Basin Heaths Special Protection Area

Hook Neighbourhood Plan 2018-2032 (HNP)

HK1 – Spatial Policy
HK4 Protecting and Enhancing the Biodiversity of Hook
HK5 – Landscape
HK6 – Hook to Newnham Gap
HK7 – Views
HK8 – Control of Light and Noise Pollution
HK9 – Pedestrian and Cycle Paths
HK10 – Parking

HK11 – Residential and Mixed-use Windfall Development

HK12 – Design

HK13 – Locally Significant Heritage Assets

Other relevant material considerations

National Planning Policy Framework (NPPF, July 2021)

Planning Practice Guidance (PPG)

National Design Guide (NDG, Jan 2021)

Building for a Healthy Life (BfHL, June 2020)

Hart's Landscape Assessment (1997)

Hart's Landscape Capacity Study (2016)

Hart, Rushmoor and Surrey Heath Strategic Housing Market Assessment 2014-2032 (SHMA, 2016)

Advice on the need for specialised accommodation for older people within Hart District as set out in the 2016 SHMA (NSAOP, June 2021)

Conservation of Habitats and Species Regulations 2017

Thames Basin Heaths Delivery Framework 2009 (TBHDF)

Hart District Council Parking Provision Interim Guidance (PPIG, 2008)

2. PRINCIPLE OF DEVELOPMENT

The outline element of this application proposes 160 units of accommodation falling within Use Class C2. It would contain:

24 no. care bedrooms - En-suite bedrooms

7 no. close care units (2 beds /2 person flats)

29 no. linked care units (10 x 2 beds 2pperson flats and 19 x 2 beds 3 person flats)

100 no. extra care units (10 x 1bed 1-person flats, 80 x 2bed 3-person flats, 10 x 2 beds 3-person bungalow).

The indicative masterplan submitted shows a cluster of buildings located towards the northeast end of the site where the flatted buildings and bungalows would be located. However, no details are provided at this stage of the GIA of the accommodation proposed due to the type of application submitted.

The HLP32 defines Specialist Supported Accommodation (Land Use Class C2) as Housing specifically designated to meet the identified needs of older people and people with support needs. The spectrum of housing within this definition is wide but focusing on this subject development, the proposed accommodation provision would be:

- Extra Care Housing (Also known as Housing with Care, Close Care, Sheltered Housing and Assisted Living) - Popular with people whose disabilities, frailty or health needs make ordinary housing unsuitable but who do not need or want to move to long-term care (residential or nursing homes). It is used to describe a range of developments that comprise self-contained homes which have been designed, built or adapted to facilitate the care and support needs that its owner/ tenants may have now or in the future, with access to care and support 24 hours a day either on site or by call.
- Care Homes - Residential setting usually in single rooms, where a number of people live and have access to on-site personal care services only - help with washing, dressing and giving medication.)

The Advice on the need for specialised accommodation for older people within Hart District as set out in the 2016 SHMA commissioned by the Council (NSAOP - para. 1.04) provides guidance on categories of specialised housing and accommodation for older people, including:

“Housing for older people. This includes what was referred to in the SHMA as ‘sheltered’ and ‘enhanced sheltered’. These terms included but did not distinguish between for rent and for sale tenure distinctions. In addition, the term ‘enhanced sheltered’ is now used by very few social landlords. Housing for older people includes:

- *Older people’s housing for social/affordable rent, e.g., contemporary ‘sheltered’ housing.*
- *Older people’s housing for sale, (typically referred to as retirement housing.*

Housing with care. This mirrors the term ‘extra care housing’ used in the SHMA, but it does not distinguish between for rent and for sale tenure distinctions. In the private market, the term ‘extra care housing’ is almost never used, this term being used primarily by social landlords. Housing with care includes:

- *Extra care housing for rent.*
- *Housing with care for sale/shared ownership. These are sometimes referred to as retirement villages (where it may or may not have an onsite care home).”*

“Residential care. Provides live-in accommodation, typically in en-suite rooms, with 24 hour-a-day supervised staffing for residents, who may need extra help and support with their personal care. For example, help with things such as washing, dressing, personal hygiene, medication, toileting, communication, feeding and mobility.’

The applicant was requested to provide clarification about the type of accommodation proposed in relation to the housing categories of specialised housing and accommodation for older people set out in the NSAOP, however it was not provided.

Therefore, with due regard to the accommodation breakdown submitted with the application and the above definitions, there would be 136 self-contained units of accommodation with different levels of care, which would be considered to fall within the ‘Sheltered/Extra Care housing’. Also, there would be 24 en-suite care bedrooms which would be considered to fall within the ‘Residential Care’ category. Both as identified in the NSAOP.

- Key Policies to the Principle of the Development

Policy SD1 of the HLP32 states that the Council will take a positive approach to decision making that reflects the presumption in favour of sustainable development. Policy SS1 of the HLP32 states that development will be focused with defined settlements, on previously developed land in sustainable locations and on allocated sites. Policy HK1 of the HNP states that the focus for growth will be within the existing settlement boundary of Hook Village. The application site does not fall within any of these categories.

Policy NBE1 of the HLP32 relates to development in the countryside and includes for development that provides specialist housing (category f), cross referencing Policy H4. Supporting text to Policy NBE1 confirms (para. 223) that to meet identified specialist accommodation needs, it may be appropriate to permit such development within the countryside in line with Policy H4.

Policy H4 is therefore a key policy to the determination of this application and relates to specialist and supported accommodation, including Class C2 uses that meet the needs of older persons or others requiring specialist care, such as that proposed in the application. Supporting text (para. 156) to Policy H4 is clear that sites within settlements are the preferred choice for meeting needs particularly at locations close to services and facilities. However, H4(b) allows for such development in the countryside subject to meeting all identified criteria at i-iii.

The Council's Planning Policy Team have provided a consultation response (the 'Planning Policy Response') which includes a 'Position Statement' on the need for specialist and supported accommodation for older persons in Hart District. The below assessment is informed by this position statement.

- Need

Supporting text (para. 156) to Policy H4 of the HLP32 states that where there is proven unmet need, particularly for C2 accommodation, specialist accommodation may, where justified, be permitted on suitable sites outside settlement boundaries.

The need for older persons housing in Hart District is derived from the SHMA, this document forms part of the evidence based for the HLP32. The SHMA analyses the estimated requirement for older persons housing. The SHMA uses data from the Housing LIN Strategic Housing for Older People toolkit (SHOP) to estimate the requirement for specialist housing for older people in the period 2014-35 (Figure 14.10). A number of these figures are referenced in the HLP32 (para. 152). The estimates shown for Sheltered/ Extra Care in Hart District are 1254 and for residential/nursing care 1157 bedspaces.

The Council has sought updated advice from Housing LIN on the HLP32 older persons housing need figures and this is provided in the NSAOP. The base date for this is March 2020. This document identifies the residual net need of 648 Sheltered /Housing with Care units and 290 residential/nursing care bedspaces in the period 2020-2035 (Local Plan covers up to the year 2032). However, there has been planning permissions issued after March 2020 which bring down the residual need to 493 Sheltered /Housing with Care units and 160 residential/nursing care bedspaces in the period 2020-2035.

The Planning Policy Response identifies new supply between March 2020 and 8 September 2021. Due to challenges distinguishing between residential care and nursing care for new developments, these figures have been combined. This identifies a new supply of 130 total residential/nursing care bedspaces. Of this supply, 70 are committed residential/nursing care bedspaces with planning permission and 60 are from an allocated site where a resolution to grant planning permission has been reached.

The resultant District-wide net residual need for residential/nursing care bedspaces to 2035 is therefore 160 bedspaces.

The Planning Policy Response concludes that *"..in light of the updated information on the need for care homes and supply, it is considered that there is insufficient need within the district to justify the release of a greenfield site in the countryside at this time."*

The following should also be noted in respect of the need for other older persons housing:

- There is no requirement to 'frontload' the provision of older persons housing within the plan period.

- There are other applications coming forward for older persons housing, including on sites within settlement boundaries.
- Policy H1 of the HLP32 (a 'general' housing policy) supports a mix of dwelling types and sizes, accessible and adaptable homes and specialist/supported accommodation. Part of the reasoned justification to H1 specifically identifies how the Policy has considered accommodation for older people (paras. 128-131). Such an approach is recognised in the PPG which states (para. 012, ref ID. 63-012-20190626): *"Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs."*

A Housing Needs Assessment (HNA) has been submitted by the applicant. The HNA sets out the estimated need for specialised housing and accommodation for older people for Hart District in two stages. The HNA identifies HDC's housing requirements for older people "based on the calculation submitted to the Hart District Local Plan examination in 2018." These estimates are drawn from the Council's SHMA (2016, 2017). The estimates of need for specialised housing for older people were produced by Wessex Economics based on 'prevalence rates' published by the Housing LIN/CSIP in 2008.

The HNA then applies 'prevalence rates' that were published in a document (Strategic Housing Resource Pack) from the Housing LIN in 2013 to the most recent ONS 2018-based population projections.

The applicants' HNA identifies a total need of 4698 units/bedspaces for 2032:

- 2,603 sheltered housing units (rent and sale).
- 585 extra care housing units (rent and sale).
- 78 housing-based provision for dementia (units).
- 1,432 residential and nursing care bedspaces.

The HNA uses this estimated need to 2032 (4,698 units/bedspaces) and deducts current provision and provision that has a planning consent that is under construction or not yet started. This identifies at 2032, a 'residual' need in Hart district for:

- 2,487 sheltered housing units (rent and sale). - very substantially above the estimate of need calculated in the NSAOP.
- 200 extra care housing units (rent and sale). - closely aligned to the estimate of need calculated in the NSAOP.
- 78 housing-based provision for dementia (units).
- 1,164 residential and nursing care bedspaces. - very substantially above the estimate of need calculated in the NSAOP.

The applicants' HNA (Sections 4) highlights contextual evidence that modifications to the Hart Local Plan would have the effect of reducing the provision of specialised housing for older people, i.e., supporting the argument for further development of such housing. However, this section provides descriptive contextual information; this is not evidence that is *directly* used as part of the quantitative assessment of need for specialised housing and accommodation for older people.

The applicants' HNA conclusion notes that the current provision of specialised housing and accommodation for older people is not evenly distributed across the district with a greater concentration in the central/eastern areas, i.e., the implication being that the proposed site at Hook is a location which is currently 'under supplied'.

However, the HNA quantitative assessment of need is based on using 'prevalence rates' that were published in a document (Strategic Housing Resource Pack) from the Housing LIN in 2011 and applying these to the most recent ONS 2018-based population projections. It should be noted that the Housing LIN no longer publishes any suggested 'prevalence rates' for specialised housing and accommodation for older people on its website nor endorses the use of earlier 'generic' prevalence rates for estimating need for specialised housing and accommodation for older people.

The reason being that the previous prevalence rates were based on an earlier assessment of the market for this type of housing and accommodation, earlier evidence of the provision of this type of housing and accommodation, they do not take account of localised factors affecting need and they do not take account of qualitative evidence in relation to the preferences of older people for different types of specialised housing and accommodation.

The Housing LIN now uses its SHOP model to undertake bespoke assessments of need for specialised housing and accommodation modifying the 'prevalence rates' as appropriate to take account of local factors, research the Housing LIN has conducted with older people and prevailing market conditions for specialised housing and accommodation for older people.

Therefore, on this basis the estimates of need for specialised housing and accommodation for older people in the applicants HNA are not based on locally sensitive 'prevalence rates' and should not be considered robust evidence of need and as seen above they are overestimated. Importantly, there is no clear justification for departing from the plan-led approach. In this respect, the Hart Local Plan Inspectors' Report (para. 137) was clear in stating:

"I appreciate that the use of other data sources may result in differing or higher levels of need. However, the SHMA has followed the approach suggested by national policy. Whilst the Plan is being examined under transitional arrangements, it is also worth noting that the new PPG guidance (Paragraph: 004 Reference ID: 63-004-20190626), now specifically refers to the SHOP analysis tool kit as being an appropriate toolkit. Given all of the above, I consider the assessment of need for housing for older people to be in accordance with national policy and is therefore sound."

And (para. 145): *"I accept that need is best established on a district level, as identified in the SHMA ..."*

Overall, in relation to the need for the proposed development, there is an identified need for older persons accommodation in the plan period, including Sheltered/Extra Care Housing and residential care proposed in the application.

The HLP32 provides an up to date and robust strategy for delivering accommodation of this type and the NSAOP and Planning Policy Position Statement confirm the type of accommodation required is being delivered within the plan period. There is no demonstrated local need for a development of the scale proposed in the application at this time or justification for a departure from the plan-led approach and more importantly there is no requirement to 'frontload' the provision of older persons housing for the plan period. As such, Policy H4(b)(i) of the HLP32 is not satisfied.

- Alternative Sites

The Planning Statement submitted contains a section considering 'Alternative Locations' (AL). Supporting text (para. 156) to HLP32 Policy H4 advises:

“A proportionate level of evidence should demonstrate that there are no suitable sites within defined settlements, that are in the vicinity of the application site (it will not be necessary to investigate all settlements in the district).”

The AL considers sites from the Hart District Brownfield Land Registry, the Strategic Land Availability Assessment (SLAA 2017) and internet search. The applicant states that the development is within close proximity to Hook and that it would be accommodating the needs of Hook, hence the search area proposed was mainly limited to Hook Village. The search carried out largely focuses on sites listed as part of the Strategic Land Availability Assessment 2017 (SHLAA) which was produced as part of the process to adopt the HLP32.

However, the call for development sites was undertaken much earlier than the published date of the document and things have moved on since then in terms of their availability. It is noted that the applicant includes four sites which are beyond Hook settlement boundary, however this is due to the fact they are sites from the SHLAA. Therefore, considering sites from this dated document is not a proper or robust approach to finding alternative sites, as this requires using up-to-date information and resources.

It is worth pointing out that the needs assessment submitted with the application seeks to demonstrate a District wide need for specialised accommodation for the elderly, it does not focus on Hook only as it analyses population projections for the District as a whole.

Nevertheless, when it comes to searching alternative sites, it mainly focuses on Hook Village. This approach is inconsistent and unacceptable when considering that the scale of the proposal would not only accommodate the needs of Hook but also the need from other towns and villages within the District. The assessment of alternative sites is not robust if it does not undertake a District-wide search to meet a District-wide need.

Notwithstanding the above, Policy H4(b)(ii) of the HLP32 and the supporting paragraph 156 are not prescriptive in this regard; it only follows that the search for alternative sites is commensurate with the magnitude/scale of the development and the need it seeks to satisfy or contribute towards.

The Council's Planning Policy Team has advised that it is apparent that the Geffery's House site within Hook is on the market and would appear to be of a size that would accommodate a care home. Geffery's House is a 1.86ha site currently on the market. It is located on London Road, within the Hook Settlement Boundary just over 1 mile east of the application site. It is approximately 350m from Hook District Centre.

Consequently, therefore the area of search has been, in the Officer's view, far too restricted and would not satisfy the above advice in the HLP32. On this basis there is objection to the geographic scope of the applicant's assessment of alternative sites. As set out in the previous section this is not the case and the requirements of Policy H4(b)(ii) of the HLP32 have not been met.

No concerns are raised in relation to criterion Policy H4(b)(iii) of the HLP32 as the site adjoins the settlement.

3. LANDSCAPE AND DESIGN

- Landscape

Policy NBE2 of the HLP32 seeks to achieve development proposals that respect and

wherever possible enhance the special characteristics, value, or visual amenity of the District's landscapes. This policy contains five criteria to assess development proposals in relation to landscape impacts. It also states that, where appropriate, proposals will be required to include a comprehensive landscaping scheme to ensure that the development would successfully integrate with the landscape and surroundings.

Policy HK5 of the HNP states that Development proposals should respect and where possible enhance the small-scale lowland mosaic landscape of the Neighbourhood Area and the key characteristics of the Loddon Valley and Forest of Eversley West Character Area.

Policy HK7 of the HNP states that development should respect views from the Hook settlement boundary towards the north-east and east across the valley of the River Whitewater and its setting; from the Hook settlement boundary to the west, towards Newnham; and from the east side of Newnham (within the Neighbourhood Area) towards the west side of the Hook settlement.

Each of the criteria from Policy NBE2 of the HLP32 are dealt with in turn below.

a) Impacts to landscape qualities identified in landscape character assessments.

According to Hart Landscape Capacity Study (2016), the site lies within area HO-01. The study area is broader than the site and its immediate but nonetheless exhibits typical landscape characteristics evident across the whole of HO-01. This study area was determined to have a high visual sensitivity, medium/high landscape sensitivity and a medium landscape value. These resulted on an area (including the application site) to have a Low overall landscape capacity, which essentially means that this landscape area cannot accommodate areas of new development without a significant adverse impact on the landscape character.

Therefore, it is inevitable that residential development of the intensity and scale proposed together with the associated infrastructure to support it would have a significant impact on the rural character of the locality. As such it would significantly intrude into the open countryside to the west of Hook.

b) the visual amenity and scenic quality of the landscape.

Hart's Landscape Assessment (1997) locates the site within the character area 2 – Tylney. It acknowledges the main positive features of the area to be dispersed patterns of rural settlements, scattered farms linked by network of rural lanes and a rural character due to sparse road and settlement pattern (amongst other things).

The site and surroundings feature in the above qualities where the enhancement priorities are mainly the conservation of the above characteristics with only localised intervention required in weakened landscape areas. However, the proposal would erode the above qualities as a result of the strong urbanisation of this section of countryside and would erode the quality of designated and views achieved between Hook and Newnham.

c) Impacts to historic landscapes, parks, gardens, and features.

Neither the site nor the adjoining parcels of land have any historic significance or are designated as such. The southern end of the Grade II* Tylney Hall Registered Park and Garden (RPG) is located west, approximately 200m away from the western end of the residential accommodation shown in the indicative masterplan.

Nevertheless, there are a tree belts between them and a section of the proposed SANG would also be located between the residential accommodation and the RPG. The intervisibility between them would be very limited and therefore no material impacts are anticipated. It is also noted the Conservation Officer raised no concerns in connection with this heritage asset or any other in the locality.

d) important local, natural and historic features such as trees, woodlands, hedgerows, water features e.g., rivers and other landscape features and their function as ecological networks.

The proposed residential accommodation would affect natural features such as mature trees and hedgerows. However, the landscaping of the development is proposed to be a reserved matter where suitable mitigation would be addressed at a later stage. It is also noted that the Council's Ecology Officer has raised no concerns to the mitigation or compensation for habitats and flora detailed in the Ecological Assessment.

e) it does not lead to the physical or visual coalescence of settlements, or damage their separate identity, either individually or cumulatively with other existing or proposed development.

The development site fully falls within the Hook to Newnham Gap (HNG), Policy HK6 requires that development should not lead to the physical or visual coalescence of these villages or damage their separate identity. The HNG covers approx. 39 Ha of countryside. The details contained in the submitted Gap Analysis (GA) set out in full the various policies that apply to the countryside between Hook and Newnham. The analysis applies Landscape Institute guidance for landscape visual impact assessment (LVIA) states: At para. 4.8 it states:

"The physical gap between Hook and Newnham remains as 10.5% (approximate) of the gap will consist of the proposed built form of the new retirement care living development. 89.5% (approximate) of the HK6 Gap will be retained as well as the open countryside towards the west of the site, maintaining a physical gap between the two settlements."

Para. 4.33, states that the proposed built form of the retirement care living development, surrounded by the proposed SANG, and with the retained open countryside, partially within the Newnham Conservation Area, would not lead to the physical or visual coalescence of the settlements of Hook and Newnham.

The above statements in the GA are not agreed by Officers of the Council. The principles which support gap policies are based on long understood and fundamentally enduring concepts. These principles among other things require that gaps include no more land than which is necessary to prevent the coalescence of settlements having regard to maintaining their physical and visual separation.

Para. 3.12 of the GA discusses the experience and character of crossing the HNG stating:

"Throughout this journey elements of built form such as the overhead power lines, residential dwellings, Owens Farm and traffic along Ridge Lane and Newnham Road provides an urban influence to this journey."

It is incorrect to use overhead (OH) powerlines as a justification for including additional built form into the countryside. OH powerlines can be a feature, albeit a detracting one, recurring across an AONB landscape for example, just as motorway or a railway line might, so in this regard they are not an influence on how a gap functions.

The existence of features which already detract from, or cause harm to, landscapes is not justification or reasoning to include further visually harmful development.

Secondly, part of the gap's character is the residential buildings that are seen or glimpsed on its outskirts. This must be true for any gap as their boundaries will inevitably be contiguous with settlements. The characteristic of buildings being visible from many locations within the HNG around the edges recognises that the gap is small yet sufficient to inform that Hook is separate from Newnham, and vice versa. This is further emphasised in the GA that notes a walking journey time of just 12 minutes for a person to leave one settlement and reach the other.

The GA states at para. 4.7 that:

"The proposed built form of the retirement care living development forms a small portion of this physical gap, with a physical gap between Hook and Newnham retained."

However, 5ha out of the 49ha HNG (approx. 12.5%) in a broadly central location would be developed with a central core at 3 storeys (proposed up to 18m in height), descending through 2.5 (proposed up to 15m in height) to 1.5 storeys (proposed up to 7m in height), including the site access road, which is also a form of development, that bisects the experience of the Gap on Newnham Road, would have a detrimental impact to the character/appearance and more importantly the function of the HNG.

It should be noted that if walkers leave Hook settlement via Footpath no. 25b, development at three storeys (up to 18m in height) would be immediately visible in the forward view approx. 235m away over the hedgerows and new tree planting (that would take 15-20 years to reach a semi-mature/max height). Currently, the forward view is devoid of any development, although the angled view to the northwest reveals the minor scale buildings of Owens Farm, some of which are traditionally built. These buildings are entirely in context with the countryside setting of the HNG and have no impact on its function.

Furthermore, in over two additional minutes, walkers would reach the southwest corner of the development passing on the south side of the existing hedgerow with formal tree planting and built form of 1.5 storeys (proposed up to 7m in height) rising to 3 storeys (proposed up to 18m in height), between 20m-50m away. During the summer when the hedgerow is in full leaf the development may be partly screened from immediate view, not so in winter but would nonetheless be in the walker's awareness given the visibility a matter of a few minutes back from where they left Hook.

From the southeast corner of site, the main access road is approx. 140m or just over 1 minute further on. Crossing the access road would likely allow full sight of the development and, due to the built form and landscape planting mitigation, deny the walkers any sense of the land beyond, currently formed by a ridge in the topography and hedge line with the tops of trees of College Copse beyond, characteristics that are entirely rural.

Overall, any pedestrian along Newnham Road would likely achieve intermittent views of the buildings and formal circulation walk of the SANG through gaps in the hedgerow flanking Newnham Road.

Finally, the supporting GA states that the development of 10.5% (more in the remit of 12.5%) of the Gap with built form of 3 storeys (up to 18m in height), maintains a physical gap between the two settlements, which would be true. However, stating that the ability of the land to function effectively as a Gap is not compromised by the development proposals is strongly disagreed.

Paragraph 235 of the HLP32 (which supports Policy NBE2) states that development in the countryside between settlements that would result in a perception of settlements coalescing, or which would otherwise damage their separate identity, will be refused. In this instance, the proposal would result in the settlements of Hook and Newnham losing their separate identities and generate an effect of coalescence.

The current extent of the HNG has been robustly tested. It cannot be argued that the area it covers is not necessary for its function; nor is it excessive. Therefore, the function of the HNG would be significantly and detrimentally compromised by the residential component of the proposal. The residential accommodation proposed is therefore contrary to Policy NBE2 e) of the HLP32 and Policies HK5, HK6 and HK7 of the HNP.

With regards to Landscape matters about the SANG proposed, the applicant is applying for full planning permission for this element of the scheme; yet there is no detail information submitted to allow full assessment. The only plan showing the SANG and related matters is the indicative masterplan. Whilst landscape details can be secured via a condition, it is expected that a proposal seeking full planning permission provides sufficient information to agree landscaping principles at the outset.

In terms of visual landscape impacts, it is difficult to establish them without detailed information. This section of the site would change from agricultural field parcels to a more formal open recreational space as a result of the inclusion of road/lane, parking, children's play, kick about area and a green gym, the circular walk and any associated furniture (signs, bins, benches, potentially height barriers at vehicular accesses amongst others). All of these features would be of a minor scale and however they would result in a degree of intrusion to the open character and nature of the landscape. This weighs against the proposal considering the designation of the HNG and the positive rural feel that it currently provides.

- Design

Policy NBE9 of the HLP32 and saved policy GEN1 of the HLP06 seek to ensure that development achieves a high-quality design and that it would positively contribute to the overall character of the area.

Policy HK12 of the HNP states that development should make a positive contribution to Hook's character and where appropriate, incorporate local vernacular and take account of the content of the Hart Urban Characterisation and Density Study.

The NPPF 2021 (para. 130) also reinforces the need to promote good design in developments and states that decisions should ensure that developments will function well and add to the overall quality of the area over the lifetime of the development; are visually attractive as a result of good architecture, layout and landscaping and would be sympathetic to local character including the surrounding built environment and landscape setting

The detailed design of the residential component, including layout, scale and appearance, is a reserved matter for subsequent consideration. Hence, the reason that only limited details are currently provided as part of the indicative masterplan and building height parameter plan is to only agree principles of the likely location of built form within the site and maximum building heights. However as discussed previously, the level of indicative information is sparse and raised concerns in terms of impacts together with assessment of landscape and countryside policies.

The other component of the proposal is the provision of SANG, as stated above this requires full details for assessment, which are currently insufficient. SANGs must meet a number of criteria so that it attracts people effectively such to draw them away from the SPA and reduce the pressure of recreation in the SPA itself. In this instance the relevant consultees looking at the design qualities/features of the SANG have raised strong objections to the proposed solutions on several counts. These have been summarised in the consultee response section above.

The submission is deficient in terms of details and meeting required criteria for a SANG proposal and the concerns raised by Natural England have been echoed by the Council's Countryside Manager. Concerns have been raised in respect of the deficient physical design of the SANG, with the current level of use of access routes (footpaths), management and monitoring detailed information, visitor strategies and budget matters.

At present the Council is unable to establish whether or not the SANG would meet design objectives of Policy NBE9 of the HLP32.

4. SUSTAINABILITY AND CLIMATE CHANGE

On 29th April 2021 Hart District Council agreed a motion which declared a Climate Emergency in the Hart District. Policy NBE9 of the HLP32 requires proposals to demonstrate that they would:

- i) reduce energy consumption through sustainable approaches to building design and layout, such as through the use of low-impact materials and high energy efficiency; and
- j) they incorporate renewable or low carbon energy technologies, where appropriate.

The submitted application is largely silent on these matters and the statements made are very general. A development of the nature and scale proposed should make a significant contribution to reduce CO2 emissions and reduce energy consumption through the use of renewable technology.

Notwithstanding that the residential component of the scheme is in outline form, an outline strategy should have been considered to establish in principle what type of technologies would be introduced to the scheme. In this manner, there would have been a clear way forward to address these objections of Policy NBE9 of the HLP32. In the absence of this, the proposal fails to meet the requirements of Policy NBE9 in terms of reducing energy consumption and incorporating renewable or low-carbon energy technologies.

5. RESIDENTIAL AMENITY

Policy NBE11 of the HLP32 supports development that does not give rise to, or would be subject to, unacceptable levels of pollution. Saved policy GEN1 of the HLP06 supports development that, amongst other requirements, causes no material loss of amenity to adjacent properties.

Paragraph 130 of the NPPF 2021 advises that planning decisions should ensure that developments achieve a high standard of amenity for existing and future users and also do not undermine quality of life for communities.

The closest residential neighbour to the residential component of the proposed development would be Owens Farm (the farmhouse itself) which adjoins the site to the east.

It is noted that the denser area of the development (3 and 2.5 storey buildings) is indicated to the west of this property at distances of approximately 18m and 45m.

The siting of the buildings would not result in detrimental impacts to the residential amenity of this adjoining property as there would be a reasonable separation distance between them. However, the proposal would result in a stark change to the surrounding environment and outlook from internal areas of the property. Whilst they would represent negative effects when compared to the current situation, it is not anticipated that they would amount to be detrimental to the amenities of the occupiers and reasonable enjoyment would continue.

In respect of overlooking and privacy, the indicative layout suggests a building facing towards this adjoining property, however with distances of approximately 18m away the impacts on privacy would not be significant. In any case the relationship with this adjoining property would be a consideration in the detailed design of the buildings at the reserved matters stage once the footprint of the building is determined. As such no concerns are raised in terms of neighbouring amenity at this outline stage.

6. HIGHWAYS/ AND PARKING AND SERVICING

Policy INF3 of the HLP32 states that development should promote the use of sustainable transport modes, prioritise walking and cycling, improve accessibility to services and support the transition to a low carbon future. Saved policy GEN1 of the HLP06 supports developments that do not give rise to traffic flows on the surrounding road network which would cause material detriment to the amenities of nearby properties and settlements or to highway safety.

Paragraph 111 of the NPPF 2021 advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Access is a matter to be fully considered at this outline stage.

Access to the development would be through a new road and priority junction off Newnham Road, which would travel north towards the north-east section of the site where the residential element is proposed. The applicant has undertaken surveys along Newnham Road to record vehicle speeds along the road and provide visibility splay assessments from the proposed new access to suit those recorded speeds.

The Local Highway Authority (LHA) has raised concerns about the visibility splays that are proposed, as they are not considered to be appropriate.

With regards to traffic generation arising from the proposal, the application has provided an analysis of network peak hours of 8:00 – 9:00 and 17:00 – 18:00 and would result in a two-way vehicle generation of 31 movements in the AM and 26 movements in the PM. The LHA has accepted these results and no objection is raised in this regard.

The LHA requested the applicant to undertake assessments for six junctions nearby the development – including the site access (through their pre-application process). The transport information submitted has not provided assessment for 3 of 6 junctions requested by the LHA on the basis that the vehicle generation of the development passing through those 3 junctions would be below 1.5 % of total peak hour flows. The LHA has raised concerns in this regard and stated that evidence of spare capacity at these junctions should be demonstrated to ensure the safely operation of the junction and safety of highway users.

Furthermore, the LHA also analysed accident data provided from the most recently available 5-year period and there are no concerns that the development would exacerbate any existing highway safety matter in this respect.

With regards to parking, the site is located within 'Zone 3' as set out in the interim Hart parking standards. The relevant section of the parking standards applicable to specialised accommodation for older people states the following maximum level of parking is expected:

Active elderly with resident warden	Active elderly without resident warden	Nursing and rest homes
1 space/unit plus appropriate general residential for warden units (e.g., 1.75 spaces/1-bed unit).	as general residential for warden units (e.g., 1.75 spaces/ 1-bed unit, 2.75 spaces/ 2-bed unit and 3.5 spaces/ 3-bed units).	1 space/ 4 residents plus 0.75 space for FTE staff.

The applicant proposes car parking in accordance with column 1 above in relation to the 100 units however they have not addressed the warden numbers. Column 3 above was applied for the remaining 60 units. The total occupancy of these self- contained residential units would be 91 persons. This would amount to 23 spaces plus those for wardens.

The parking information from the applicant states that there would be 30 FTE staff that would correspond to the staff required for the 60 units above. It appears that these staff would be separate from the wardens required by column 1 and would require 22 spaces. Accordingly, there would only be a shortage of 7 spaces for the residents of the 60 units using column 3 from the parking standards.

There would also appear to be a parking shortage for residents' wardens looking after the residents that would occupy the 100 units referred to above. Since there are no numbers of wardens provided in the information, it is not possible to establish whether or not the total shortage of spaces is crucial or not.

In terms of servicing (deliveries, refuse and recycling), the proposal would not raise concerns at this stage, the relevant information required would have been part of the reserved matters left for subsequent approval if this application had been recommended for approval.

However as discussed above, the proposal fails to provide adequate highway information to demonstrate suitable visibility splays at proposed access and that the highway network junctions in the vicinity of the development would operate safely. This is fundamental to the acceptability of the proposal. In addition, there has been inconclusive information submitted to establish whether or not the parking provision is satisfactory.

It is also noted that the LHA requested the provision of a footway along Newnham Lane between the proposed Access and Seton Drive, which would include tactile paving and dropped kerbs installation) to the east of the site. The reason being that there currently no safe route along Newnham Road and the introduction of the proposed development would likely change pedestrian flows. Also, the LHA requested necessary improvements to footpath 25b and/or links of pedestrian routes to the settlement through Hop Garden Road, however the submitted transport information does not consider any.

A Draft Travel Plan (DTP) has been provided that proposes a number of measures to encourage more sustainable transport patterns. These proposes pedestrian, cycle and public transport initiatives as well as car sharing. The LHA has requested incorporation of additional measures within these initiatives and details about the enforcement of the travel plan along monitoring/approval fees.

As such, as it stands, the proposal would be contrary to Policy INF3 of the HLP32, Saved Policy GEN1 of the HLP06 and Paragraph 111 of the NPPF 2021.

7. FLOOD RISK AND DRAINAGE

Policy NBE5 of the HLP32 sets out five criteria when development would be permitted, in this case the applicable criteria are that over its lifetime the development would not increase the risk of flooding elsewhere and will be safe from flooding; if located within an area at risk from any source of flooding it must be supported by a site-specific flood risk assessment complying with national policy and within causal flood areas (as defined in the SFRA) it takes opportunities to reduce the causes and impacts of flooding.

Flood mapping indicates that the application site the falls within Flood Zone 1, which means there is low probability of river flooding. The Flood Risk Assessment submitted with the application has been analysed by the Lead Local Flood Authority (LLFA) and they have raised an objection due to inconsistencies and a lack of detailed calculations.

The applicant's drainage strategy proposes infiltration and balancing ponds located to the north-western corner of the site (within the SANG), however the ground investigation undertaken states that soakaway drainage would not be suitable at this location. Therefore, infiltration testing is required to demonstrate that the ponds would be feasible and that there would be at least 1m in height of unsaturated ground between the base of any infiltration pond/feature and the highest groundwater level recorded, including seasonal variations (winter months).

The strategy also includes discharging surface water into a ditch in the western part of the site at a rate of 14 litres/second. However, the applicant has not included the values and calculations and it is unclear whether it is the discharge corresponds to the entire site or just the developable areas.

As such the proposal fails to meet objectives of policy NBE5 of the HLP32 and the NPPF 2021, in this regard.

8. ECOLOGY

Policy NBE4 of the HLP32 states that 'In order to conserve and enhance biodiversity, new development will be permitted provided:

- b) It does not result in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;
- c) opportunities to protect and enhance biodiversity and contribute to wildlife and habitat connectivity are taken where possible, including the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations. All development proposals will be expected to avoid negative impacts on existing biodiversity and provide a net gain where possible'.

The Council's Ecologist assessed the Ecological Assessment submitted which contains a preliminary roost assessment. The survey found two buildings which would be demolished to have a low potential to support roosting bats. However, a single bat emergence survey on these two buildings is required to ensure there are no implications with bats. This matter cannot be conditioned.

European Protected Species surveys (including bats) are required to be undertaken and submitted prior to determination so the impacts on bats can be fully assessed.

Also, in terms of biodiversity gains as required by the NPPF, the Biodiversity Metric submitted has been applied and this appears to demonstrate a significant Biodiversity Net Gain (BNG) (51.88% habitat and 12.61% hedgerow units). However, this calculation includes the habitat enhancements on the proposed SANG and is therefore an overestimation of the actual BNG of the development.

The current guidance is that habitat enhancements necessitated to meet SANGs requirements, or other legal compliance, cannot be used within the BNG calculation to avoid double counting. The BNG calculation should therefore be re-run to provide BNG values for the development only, excluding the required enhancements for SANG provision.

As such as it stands the proposal would not meet the objectives of NBE4 of the HLP32 and the NPPF 2021 in this regard.

9. TREES

Saved policy CON8 states that where development is proposed which would affect trees, woodlands or hedgerows of significant landscape or amenity value planning permission will only be granted if these features are shown to be capable of being retained in the longer term or if removal is necessary new planting is undertaken to maintain the value of these features. planning conditions may be imposed to require the planting of new trees or hedgerows to replace those lost.

The Council's Tree Officer assessed the information submitted and has stated that the information submitted does not comply with the required British Standard in that it does not provide standard information on individual trees, rather has lumped many into groups of trees even when species are mixed and provided average information yet then shows some information within plan appendixes.

Whilst the indicative masterplan does show buildings sited away from boundary trees in many cases which is positive, in a number of cases this is not so. Within the northeast of the site a number of buildings are pushed up against the site boundary which is a woodland strip. Due to the proposed occupancy this is likely to lead to future conflict between trees and residents, as trees block out light and view and will lead to pressure to remove or reduce trees significantly.

It should be noted that there are no TPO trees on site, however, there needs to be a clear understanding of existing trees to establish trees worthy of retention/removal as a result of the development proposed. This is particularly important as it would have implications with the visual landscape impacts of the proposal, which have been raised as a concern. Overall, due to the lack of accurate information in this respect, these aspects would weigh against the proposal and conflict is found with Policies NBE2 and NBE9 of the HLP32 and Saved Policy CON8 of the HLP06.

10. OTHER PLANNING CONSIDERATIONS

- Affordable Housing

Policy H2 of the HLP32 requires that major developments (i.e., developments where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more) the Council will require 40% of the new homes to be affordable housing.

Among other requirements there should be a tenure mix of 65% affordable housing for rent and 35% affordable home ownership, unless superseded by the most up to date evidence concerning local housing need.

The proposal would comprise 136 self-contained units of accommodation (with different levels of care). The corresponding 40% of affordable units would amount to 54.4 unit. Thus, the provision required would be 54 units onsite plus a financial contribution to cover 0.4 of a unit.

The planning statement, in this respect, at paragraphs 9.9 and 9.10 state:

“The applicant is committed to providing affordable housing on-site, in order to meet the policy requirement, set out in Policy H2” and in para 9.10 “Provision of affordable housing will be subject to negotiations of the Section 106 Contribution.”

The applicant was aware from the outset (from pre-application discussions) that the planning submission was required to demonstrate a 40% affordable provision unless a viability report demonstrated that the application could not meet the policy requirement.

The submission is not policy compliant nor has suitable justification been made on viability grounds. As such the proposal is contrary to Policy H2 of the HLP32 and the aims of the NPPF 2021 in this regard.

- Heritage Assets (other than the RPG)

Policy NBE8 of the HLP32 states that development proposals should conserve or enhance heritage assets and their settings, taking account of their significance.

Paragraphs 195, 199, 200, 202, 203 are of relevance for determining the significance of a Heritage Asset (HA), assessing the impact on significance and the need to weigh harm, including for non-designated HAs.

The Rotherwick Conservation Area (RCA) is located 500m northwest from the north most boundary of the site and the Newnham Conservation Area (NCA) is 60m west from the western boundary of the site at the closest. No impacts are anticipated to the RCA or its setting due to the separation distances, topography and tree belts which exist between the site and the boundary of this HA generating a lack of intervisibility between them.

With regards to the impacts on the Newnham Conservation Area (NCA), the potential element affected by the proposal would be eastern views from NCA (along its eastern border) towards the application site. Although intervisibility between the development and the NCA are very limited as a result of mature tree belts between them, the development would be regarded to form part of the setting of this heritage asset.

It is noted that intervisibility would slightly increase at wintertime when there is less leaf in the vegetation along the perimeter of the parcels of land.

Whilst the proposal would not be directly visible from the NCA, the development would increase awareness of built form due to associated infrastructure such as roads and streetlighting that may be required to serve the development. Currently the application site is largely development free, hence it is anticipated that a less than substantial harm to the setting of the development would arise.

It is also noted that there has been an objection from Basingstoke and Dene Borough Council (BDBC) in this respect however they note that there is a need to submit additional information to enable them to fully assess and establish impacts on the NCA and its significance.

The HNP also identifies the farmhouse and granary at Owens Farm together with St John Cottages along Newnham Road as non-designated HAs.

The proposed development would be within the setting of numerous assets listed above, particularly the farmhouse and granary as the residential component of the proposal would be immediately adjacent to them eroding the positive agricultural character of the immediate surroundings which contributes to their significance of their local history.

Therefore, there would be conflict with Policies NBE8 and NBE9 of the HLP32. Given the identification of less than substantial harm from the scheme, it is necessary for the submission to demonstrate that the proposal is able to secure the delivery of public benefit(s) at a level such to outweigh the level of harm caused to the heritage assets. This is dealt with below in the planning balance.

- Thames Basin Heaths Special Protection Area (SPA).

The application indicates that an area of roughly 8.3 hectares of Suitable Accessible Natural Greenspace (SANG) would be provided in order to mitigate the potential impact of the development on the nature conservation value of the SPA.

Natural England (NE) has been consulted on the proposal and as previously discussed has raised a strong objection to the SANG proposed as part of the proposal. The submission lacked detailed information not only about the detailed design of the SANG but also financial and management matters.

Therefore, this element of the proposal would result in adverse effects on the TBHSPA, contrary to Policies NBE3 and NBE4 of the HLP32, Saved Policy NRM6 of the South East Plan, the Thames Basin Heaths Delivery Framework 2009 and the NPPF 2021 in this regard.

- Equality

The Council has a responsibility to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act and those who do not. The Public Sector Equality Duty under the Equality Act 2010 identifies 'age' as a 'protected characteristic'. The proposed development would provide accommodation for older persons and the application raises no concerns about equality matters.

11. PLANNING BALANCE

Section 70(2) of the Town and Country Planning Act 1990 ("TCPA 1990") provides that the decision-maker shall have regard to the provisions of the development plan, so far as material to the application. Section 38(6) of the Planning and Compulsory Purchase Act 2004

(as amended) requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

It is important to note the public benefits which would arise from this proposal, and these are as follows:

- Social benefits would arise as a result of the provision of a specialised accommodation for older residents in the District;
- Economic benefits attracted by the proposal would be employment during the construction of the development, the additional employment generated by the completed proposal and the additional expenditure in the local economy at both construction and following occupation.
- Environmental benefits arising would be limited to ecology and biodiversity over and above the current level on the site.

The dis-benefits and harm identified above are:

- This submission overestimates the needs for specialised housing and there is neither a demonstrated local need for a development of the scale proposed at this time nor justification for a departure from the plan-led approach and more importantly there is no need to 'frontload' the provision of older persons housing for the plan period in countryside locations.
- There would be a significant adverse harm to the intrinsic open and natural character of the countryside, the material erosion of the designated strategic gap between Hook and Newnham and the significant detriment to the visual landscape of the area as a result of the proposed residential element of the proposal, and additional negative influence from the introduction of a formal recreational open space (SANG) in the strategic gap.
- The proposal would result in a less than substantial harm to the heritage assets (designated and non-designated) as a result of the radical change the development would cause to their setting.
- The demolition of buildings on the site and lack of information in this respect would potentially result in impacts to bats, which are protected species.
- Unsuitable information has been provided to establish a clear understanding of onsite trees that are worth retaining and whether they would be affected or not.
- The proposed SANG in the scheme would not meet Natural England's requirements, which would result in a SANG that would not mitigate negative effects on the SPA.
- Unsuitable information has been provided to demonstrate that surface water run off with the site would be dealt appropriately without affecting adjoining land.
- The scheme has not demonstrated that the safety operation of the highway network would be achieved and there is inconclusive information to establish car parking requirements.

- The proposal submitted does not offer any level of affordable provision or provide a viability/financial report to establish maximum level that can be provided.
- The proposal does not provide any meaningful information to establish likely technologies that would be introduced to achieve a meaningful reduction of CO2 emissions or energy consumption through renewable technologies.

Considering the benefits stated above against the different categories of harm identified, the proposed development is in clear conflict with the development plan as a whole and the benefits of the proposal are not significant as to outweigh the material harm caused.

The proposal conflicts with the HLP32 and HNP in relation to the principle of the development, landscape and strategic gap impacts, heritage harm, inadequate TBHSPA mitigation, highway safety, flood risk/ drainage and sustainability. The application is also contrary to the aims of the NPPF in these respects.

The above material considerations (planning benefits) are not of sufficient weight to indicate a departure from the development plan should be taken in this instance.

CONCLUSION

The application has been assessed against the development plan and relevant material considerations and it is recognised that it would bring some planning benefits, most notable in respect of the delivery of specialist housing for older persons and job creation. However, material conflicts with the development plan have been identified as set out in this report.

RECOMMENDATION - Refuse

REASONS FOR REFUSAL

1. The proposed development does not comply with the spatial strategy of the development plan. The application has failed to satisfy the relevant criteria for specialist and supported accommodation to meet the needs of older persons within the countryside in respect of; demonstrated need, alternative sites and relationship to an existing settlement. As such, the proposal is contrary Policies SD1, SS1, NBE1(f) and H4(b) of the Hart Local Plan (Strategy and Sites) 2016-2032 and Policy HK1 of the Hook Neighbourhood Plan 2018-2032.
2. The proposed development, in a countryside location outside of the defined settlement boundary of Hook, within an area designated as a Local Gap to maintain the separate identities of Newham and Hook and which benefits from designated views; would represent a detrimental development which would have a negative effect on the character, setting and visual landscape of the countryside and the settlement of Hook by virtue of its siting, quantum, visual coalescence effect between villages and prominence in the landscape. As such the proposal would be contrary to the objectives of Policy NBE2 of the Hart Local Plan (Strategy and Sites) 2016-2032, Saved Policy GEN1 of the Hart District Local Plan (Replacement) 1996-2006, Policies HK5, HK6 and HK7 of the Hook Neighbourhood Plan 2018-2032 and the aims of paragraph 174b of the NPPF 2021.

3. The proposed development; by reason of its siting, quantum and relationship with the Newnham Conservation Area and non-designated heritage assets adjacent to the development site would cause less than substantial harm to their significance as a result of the radical change to their setting and the contribution it provides to their history. The harm would not be demonstrably outweighed by any public benefits arising from the proposal. As such the development is contrary to the objectives of Policies NBE8 and NBE9 of the Hart Local Plan (Strategy and Sites) 2016-2032, Saved Policy GEN1 of the Hart District Local Plan (Replacement) 1996-2006, Policy HK13 of the Hook Neighbourhood Plan 2018-2032 and Paragraphs 200, 202 and 203 of the NPPF 2021.
4. In the absence of a bat emergence survey, it cannot be confirmed that the proposed development would not be harmful to the local bat population and as such the proposal conflicts with Policy NBE4 of the Hart Local Plan (Strategy and Sites) 2016-2032, Paragraph 174d of the NPPF 2021 and the requirements of the Conservation of Habitats and Species Regulations (2017) (as amended) and the Wildlife and Countryside Act (1981) (as amended).
5. The proposed Suitable Alternative Natural Greenspace (SANG), by virtue of insufficient details on design, landscaping and furniture, incorporation of children's play equipment, road, long term management and monitoring, in-perpetuity costs/capital charges and budget details; would represent an inadequate SANG which would not mitigate adverse effects on Hazeley Heath Site of Special Scientific Interest (SSSI) which forms part of the Thames Basin Heaths Special Protection Area (SPA). As such the development is contrary to Policy NBE3 of the Hart Local Plan (Strategy and Sites) 2016-2032, Saved Policy NRM6 of the South East Plan 2006, Thames Basin Heaths Delivery Framework 2009 and Paragraphs 180 and 181 of the NPPF 2021.
6. In the absence of an adequate Flood Risk Assessment containing infiltration tests and calculations for surface water discharge rates, the Local Planning Authority is unable to conclude that the proposed development would not increase flood risk off-site on adjoining land and also downstream to the west of the site. As such the proposal conflicts with Policy NBE5 of the Hart Local Plan (Strategy and Sites) 2016-2032 and Paragraph 167 of the NPPF 2021.
7. In the absence of adequate highway information to demonstrate spare capacity of junctions at Station Road to London Road, Elms Road to Old School Road, London Road to Newnham Road, the Local Planning Authority is unable to conclude that the proposed development would not detrimentally impact on highway safety on the nearby highway network. As such, the proposal conflicts with Policies NBE9 and INF3 of the Hart Local Plan (Strategy and Sites) 2016-2032, Saved Policy GEN1 of the Hart District Local Plan (Replacement) 1996-2006 and Paragraph 111 of the NPPF 2021.
8. The proposed development fails to make provision for affordable housing and has not been accompanied by suitable viability information to demonstrate that such provision would be unviable. As such the proposal conflicts with Policy H2 of the Hart Local Plan (Strategy and Sites) 2016-2032.

9. In the absence of an energy strategy outlining the incorporation of any renewable or low carbon technologies to achieve reductions of CO2 emissions or reduction of energy consumption by the development, it cannot be concluded that the proposed development would contribute to addressing the impacts of climate change. As such the proposal conflicts with Policy NBE9 of the Hart Local Plan (Strategy and Sites) 2016-2032 and Paragraph 157 the NPPF 2021.

INFORMATIVES

1. The Council works positively and proactively on development proposals to deliver sustainable development in accordance with the NPPF. In this instance, the proposed development was deemed to be unacceptable for a number of reasons as listed above. The development was therefore determined on the basis of the information provided.